

# Appendix 1 – Corporate Governance Action Plan January 2006

## 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	Achievements and Current Position (December 2004)	Action Plan for 2005	Position at January 2006	Action Plan for 2006 and Responsible Officer
a	<p>Publish on a timely basis an annual report presenting an objective, understandable account of the authority's:</p> <ul style="list-style-type: none"> <li>• Activities and achievements</li> <li>• Financial position and performance</li> <li>• Improvement targets</li> </ul>	<p>Annual Financial Statements Annual Business Plan Formal Annual Report</p>	<p>The Corporate Strategy and Management Agenda set out long term objectives, plans and some targets. The Annual Action Plan summarises achievements against those targets The Council does not produce an annual report encompassing all of the required elements. Separate documents are produced which detail the financial position and 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.</p>	<p>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</p> <p>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.</p>	<p>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.</p>	<p>None Required</p>	<p>Performance summary again produced in the March 2005 Brent Magazine. An annual review of progress against the corporate strategy 04/05 was produced in June 2005 and distributed in the August Edition of The Brent Magazine</p> <p>For the first time, a summary of the Councils annual accounts were produced and distributed with The Brent Magazine in September 2005.</p> <p><b>UOR Financial Reporting Level 4 - 2.8</b></p>	<p>Next year the two publications i.e. annual review of performance and the summary of the accounts will be merged.</p> <p>Director of Finance and Corporate Resources Director of Communications and Consultation</p>

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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.	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	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.  There are a number of concerns regarding the effectiveness of user forums, including the linkages back to the relevant service areas. This issue has been reported to the Overview Committee on 22 <sup>nd</sup> March 2005.	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  A review of support to user consultative forums has been proposed.	Baseline data is now being collected from ACF meetings for four cycles, (one year's meetings). Some improvements have been made to Service User Consultative Forums – a revamped Brent Disabilities Forum is being re-launched in December. Improvements have been made to link outcomes of service user forums to Overview Committee. Quarterly ward meetings provide a forum for Members to discuss matters of concern with officers and shape how services are provided at the neighbourhood level. Depending on the issues being addressed, these meetings are attended by the Police and other partner agencies. Progress is communicated to residents through quarterly ward newsletters. The 2005 Residents' Attitude Survey was completed in November 2005. A full textual analysis is due from Ipsos MORI during December 2005.	Proposals to amalgamate the Children and Youth Forums are being looked at by Legal and Democratic Services.  Borough Solicitor Director of Communications and Consultation

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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	<p>The access to information rules are set out in the Council's constitution</p> <p>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.</p> <p>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</p> <p>The Council has an access to information protocol</p>	None required		Address the implications of the Freedom of Information Act	<p>A review of the Council's adherence to the Freedom of Information Act was reported to CMT in September and the Executive in October 2005. It showed that the Council is meeting its obligations under the act and that performance is generally high with regard to responding to requests within the statutory time limit.</p> <p>A report on the impact of the Environmental Information Regulations was presented to CMT in October 2005 and CMT agreed to increased co-ordination of FOI and EIR requests.</p>	Further report to CMT on integration of FOI and EIR issues

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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 iiP 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 Gujarati 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.	A new Corporate Consultation Strategy 2006 – 09 is in draft and due to be launched in January 2006. An Overview Task Group met on three occasions and provided member input into the draft strategy. The strategy will be launched together with an up-dated version of the Brent Consultation Toolkit Consultation Tracker is up and running and is being populated by service areas.	Launch of new Consultation Strategy  Director of Communications and Consultation

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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.	The 2005 Residents' Attitude Survey was completed in November 2005. A full textual analysis is due from Ipsos MORI during December 2005. The Consultation Team have used the last three surveys, (BVPI General 2004 / BVPI Interim 2005 / Residents' Attitude Survey 2005), to recruit new panel members.  During the past year the Local Strategic Partnership arrangements have been reviewed with the aim of creating a more appropriate structure to deliver priority outcomes and the future Local Area Agreement (LAA). This review has resulted in the creation of an LSP Executive 'Partners for Brent', a new Local Public Services Board and The Brent Community Empowerment Network. A Brent Employer Partnership has also been established, with membership of over 60 local businesses. With a sound approach to performance management and a robust improvement plan, the LSP self-assessment submitted in May 2005 received the endorsement of a 'green' rating from the Government Office for London. This is one of only two new 'green' rated LSP's in London.	The new panel will be evaluated for adequacy of representation and further targeted recruitment will take place within the 2005/06 financial year.  Director of Communications and Consultation

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### 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	Achievements and Current Position (December 2004)	Action Plan for 2005	Position at January 2006	Action Plan for 2006
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	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.	The council published a two year RES and Race Equality Action Plan in May 2004. Progress of year 1 of the action plan was reviewed and reported to the council's Leadership Group in April 2005.  The council formally signed off Level 2 of the Equality Standard at CMT in December 2005, and is committed to reaching Level 3 by September 06.  The council has continued to publish its annual workforce monitoring report with an action plan, and an annual report on equalities/diversity.	The council will publish a new RES and REAP by May 2006.  To reach Level 3 of the ESLG by September 06.  To publish the annual workforce monitoring report by September 06 and the annual report on equalities/diversity by July 06.  Director of HR and Diversity
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 is reported at Departmental Management Teams	PRU have verified that performance management is on the agenda at all departmental management teams.	None required	Key targets continue to be monitored through the Improving Brent Action Plan 2004-2006. The Improving Brent Action Plan 2004-2006 sets out the key actions and priorities derived from the Corporate Strategy and is supported by a detailed monitoring report which is assessed every six months by the Corporate Management Team and the Executive against the agreed targets.  The Corporate Strategy Monitoring report went to the full Council in November 2005.	None Required

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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 Commissioning Joint Funding Joint Accountability	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	The Leader of the Council and Chief Executive take an active role within the West London Alliance (WLA). This grouping has been influential in its work on community cohesion. The WLA Community Cohesion pathfinder project (funded by the Home Office) has led the work on developing best practice in promoting community cohesion and disseminating examples within local government. Brent holds the chair of the WLA for 2005-2007. Sub-regional joint working at officer level exists across a range of services including regeneration, health and social care, housing, ICT, procurement and policy development.	None Required

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### 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	Achievements and Current Position (December 2004)	Action Plan for 2005	Position at January 2006	Action Plan for 2006
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	Discussed with Members.  All non-confidential reports and Minutes are now on the Internet.	To be agreed and published on website –Timescale: May 2005	Members have completed annual reports for 2003/4 which have been published on the website.	None Required

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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.	To make Member training mandatory in some areas. (subject to HR and Legal advice)  Continue to develop and deliver training plan.	Legal position researched. Members training cannot be made mandatory. However, attendance lists are maintained for courses on the Member Development Programme	None required  One to ones to be held with Members.- Timescale Early 2005.	On-line training on risk management for members has been publicised and the CIPFA guide to Local Government finance for Councillors has been made available  <b>UOR Internal Control Level 3 – 1.9</b>	The action plan for 2006 is to work up induction arrangements for new councillors in May 06 and continue to deliver a high standard of training and development opportunities to new and existing members.  Borough Solicitor Director of Communications and Consultation

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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. Financial 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.	Finalise production of a report writing guide for officers.	Report writing guide completed in October 2004	Procedure for early submission of reports to Legal needs to be reinforced – Timescale: Ongoing	Discussed at CMT. Borough Solicitor and Director of Finance can remove reports from agendas.  <b>UOR Internal Control Level 2 – 2.10</b>	None Required
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.	Finalise production of a report writing guide for officers.	Report writing guide completed in October 2004	Procedure for early submission of reports for Legal Implications needs to be reinforced – Timescale: Ongoing	Discussed at CMT. Borough Solicitor and Director of Finance can remove reports from agendas.  The Legislation Tracker published by the Borough Solicitor denotes the relevant CMT member with responsibility for implementing new legislation. Legal bulletins are issued giving advice on emerging legislation and case law.  <b>UOR Internal Control Level 2 – 2.10</b>	None Required

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I	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.	An audit of job descriptions of all senior staff to ensure that they are clear and up to date, will be undertaken	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: March 2005	Reviews of senior posts are now complete as part of the restructure of departments to Children and Families and Housing and Customer Services. The constitution sets down the roles and responsibilities of senior officers and has been amended to reflect these changes in November 2005	None Required

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## Dimension 4 – RISK MANAGEMENT AND INTERNAL CONTROL

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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	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	Risk Management Strategy approved by the Executive in September 2005.  <b>UOR Internal Control Level 2 – 1.1</b>	Ongoing work to embed the process  Director of Finance and Corporate Resources

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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 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 statutory and other authorities that govern their use	Scheme of delegation Internal Audit protocol Performance Appraisal Performance Management System Financial Standards and Regulations	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 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.	Formalise Strategic Risk analysis at PCG through publication of a risk register  Ensure new Risk Management Team is operational and effective. Ensure that Legal and BFS continue to have input into all reports at the earliest opportunity  Carry out training of service areas	The first stage of the Council wide risk register has been developed.          Some training delivered.	Ongoing development of the Risk Register  Evaluation of IT solution to risk register – Timescale: March 2005 Procedure for early submission of reports to Legal needs to be reinforced – Timescale: Ongoing  Further training to be delivered during 2005	New Risk Register system has been purchased and all risks are in the process of being transferred from the old system. The system also allows the Council to input and review partnership risk.  <u>UOR Internal Control Level 3 – 1.7</u>  Guidance has been issued to Departmental Management Teams on Risk Management and an on-line training pack is now available.  <u>UOR Internal Control Level 3 – 1.9</u>	Ongoing work to embed the process  Director of Finance and Corporate Resources  Ongoing monitoring of risk management arrangements  Director of Finance and Corporate Resources

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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.	Produce Annual Risk Report	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	The SIC process is fully embedded and complies with the CIPFA guidance. A full review of internal controls was undertaken for 2004/05, including the submission of certificates of assurance from all Service and Corporate Areas. The SIC was reviewed by the Strategic Finance Group and Performance and Finance Select Committee prior to sign off and submission to General Purposes.  <b>UOR Internal Control Level 2 – 2.1 to 2.4</b>	Continued development of Certificates of Assurance and embedding SIC review process  Director of Finance and Corporate Resources

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## Dimension 5 – STANDARDS OF CONDUCT

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Achievements and Current Position (December 2004)	Action Plan for 2005	Position at January 2006	Action Plan for 2006
a	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 Governors. Fraud Awareness Training commenced. Officer Code not in place, awaiting production of national model code.	Code of conduct for officers to be produced following production of model code.  Need to roll out fraud awareness training across authority.	A draft national code was issued in November 2004. Draft Brent Code produced for agreement with Unions and CMT. Procedure for hearing complaints about member conduct has been drafted  Number of fraud awareness sessions delivered across the Council	Draft Code to be presented to CMT by March 2005.  Ongoing delivery of Fraud Awareness Training	Officer code agreed with staff side representatives and now formally adopted.  <b>UOR Internal Control Level 2 – 3.3</b>	None required
b	Put in place arrangements to ensure that members and employees are not influenced by prejudice, bias or conflicts of interest in dealing with stakeholders and put in place appropriate processes to ensure that they continue to operate in practice	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 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	Complete review of policy and procedures concerning gifts and hospitality.  Complete review of Member Interests	Current internal audit review of gifts and hospitality.  Review complete. To be reported to Standards Board in January 2005.	Internal Audit to report on this review by February 2005  None required	Review of Members gifts and Hospitality completed and reported to Standards Committee.  Review of Officers gifts and hospitality complete and reported to Director of HR.  <b>UOR Internal Control Level 2 – 3.4</b>	None required

**Note: References to UOR relate to the Use of Resources Comprehensive Performance Assessment Block. This has five elements including Financial Reporting, Financial Management, Internal Control, Financial Standing and Value for Money. Within each element there are criteria for reaching levels 2 to 4 and within each criteria there are a number of “lines of enquiry”. These are denoted by the numbering. For example **UOR Internal Control Level 2 – 2.1** relates to line of enquiry number 2.1 within the second level of the Internal control element.**

## Appendix 1 – Corporate Governance Action Plan January 2006

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Achievements and Current Position (December 2004)	Action Plan for 2005	Position at January 2006	Action Plan for 2006
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 Position unclear with regard to Contractors although BHP have made their own arrangements Audit Commission hotline has not been actively publicised.	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		Whistleblowing policy to be reviewed – Timescale: March 2005	New whistleblowing policy now in place. Publicised to staff and on intranet. New policy is more explicit regarding contractors/agents and the points of contact outside the authority.  <b>UOR Internal Control Level 3 – 3.12, 3.18</b>	None Required

**Note:** References to UOR relate to the Use of Resources Comprehensive Performance Assessment Block. This has five elements including Financial Reporting, Financial Management, Internal Control, Financial Standing and Value for Money. Within each element there are criteria for reaching levels 2 to 4 and within each criteria there are a number of “lines of enquiry”. These are denoted by the numbering. For example **UOR Internal Control Level 2 – 2.1** relates to line of enquiry number 2.1 within the second level of the Internal control element.