

LUTON BOROUGH COUNCIL

CODE OF CORPORATE GOVERNANCE

2007

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CODE OF CORPORATE GOVERNANCE

1 BACKGROUND

- 1.1 Corporate Governance is the system by which local authorities direct and control their functions and relate to their communities. It is founded on the fundamental principles of openness, integrity and accountability together with the overarching concept of leadership.
- 1.2 The function of governance is to ensure that Luton Borough Council (the Council) fulfils its purpose and achieves the intended outcomes for citizens and service users and operates in an effective, efficient, economic and ethical manner.
- 1.3 In this respect, the Council recognises the need for sound corporate governance arrangements and has put in place policies, systems, procedures and structures that together determine and control the way in which the Council manages its business, formulates its strategies and objectives and sets about delivering its services to meet those objectives.
- 1.4 The Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded, properly accounted for and used economically, efficiently and effectively.
- 1.5 The development of this Code of Corporate Governance is consistent with the principles and requirements of the guidance produced jointly by the Chartered Institute of Public Finance and Accountancy (CIPFA), the Society of Local Authority Chief Executives (SOLACE), the Local Government Association (LGA) and the Audit Commission (CIPFA/SOLACE Framework) and will help to ensure proper arrangements are in place to meet that responsibility.
- 1.6 This Code has been produced to demonstrate the Council's commitment to managing its affairs and relations with the community in an open, honest and accountable way in all the different aspects of its business. This Code provides the framework for the Council to achieve its aims and objectives as well as the process for monitoring and maintaining the Code. This Code supersedes and replaces any previous Codes issued.
- 1.7 Corporate governance is at the heart of the Government's modernising agenda of:

Democratic renewal.
Outward-looking, accountable and responsive service.
Community leadership.

Continuous improvement.

Engagement of the local community, consultation and partnership working.

Performance management.

High standards of conduct and probity.

- 1.8 To deliver this agenda, it is essential that the Council has sound corporate governance arrangements in place that reflect the three fundamental ethics of:

Openness. To ensure that stakeholders can have confidence in the decision-making and management processes and in the approach of the individuals within them.

Integrity. Based upon honesty, selflessness and objectivity and high standards of propriety and probity in the stewardship of public funds and management of the Council's affairs.

Accountability. Where the Council (members and officers) is responsible for the decisions and actions, including the stewardship of public funds and all aspects of performance, and submits them to appropriate external scrutiny.

- 1.9 The Council is accountable in a number of ways.

Elected members are democratically accountable to their local area and this gives a clear leadership role in building sustainable communities.

The Council is subject to external review through the external audit of the published financial statements.

The Council is subject to national standards and targets.

The Council's budgets are subject to significant influence and overview by Government, which has powers to intervene.

Members and officers are subject to codes of conduct.

Where maladministration may have occurred, an aggrieved person may appeal either through their local councilor or directly to the ombudsman.

- 1.10 The Council relies on public confidence in its members and officers to be effective. Good governance strengthens credibility and confidence in the Council and the services it delivers. Aspects of corporate governance find expression in the everyday practices and procedures of the Council. An overarching Code of Corporate Governance fulfils the following purposes:

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Stimulates confidence in the activities of the Council, its politicians and officers, and the way it goes about business.

Focuses the minds of those involved in the Council on making decisions in a proper way and engaging local stakeholders.

Assists with continuous improvement in the delivery of services, and serves to minimise the Council's exposure to risk.

- 1.11 The Council has an ongoing commitment and intention to develop, maintain and review the Code, including arrangements for ensuring its ongoing application and effectiveness. Policies, systems and procedures are in place to ensure that the Council fulfils its purpose and achieves the intended outcomes for citizens and service users and operates in an effective, efficient, economic and ethical manner.
- 1.12 The results of the review of the Code will be reported internally to the Audit and Governance Committee and externally with the published accounts. This will provide assurance that:

Governance arrangements are adequate and operating effectively.

Where gaps are revealed, action is planned that will ensure more effective governance.

2 THE PRINCIPLES OF GOOD GOVERNANCE

- 2.1 There are six core principles of good governance within the Good Governance Standard developed by the Independent Commission on Good Governance in Public Services detailed in the CIPFA/SOLACE Framework. These are detailed in Appendix 1.

3 COUNCIL'S POLICY ON CORPORATE GOVERNANCE

- 3.1 The Council's aim is to ensure that the following ethics underpin its operations at all times:

Openness and inclusivity
Accountability
Integrity and honesty

This is reflected in the Council's corporate values of:-

Accountable
Customer Focused
Embrace equality and diversity
Improving

Integrity
Respect for others.

- 3.2 The Council is committed to the principles of good corporate governance identified in the CIPFA/SOLACE Framework and reviewing existing governance arrangements against this framework.
- 3.3 The Council has an ongoing commitment and intention to develop, maintain and review its local Code of Corporate Governance, including arrangements for ensuring its ongoing application and effectiveness.
- 3.4 The Council recognises that achieving high standards of corporate governance will encourage its stakeholders to have confidence in the Council and allow the Council to more effectively undertake its activities.
- 3.5 The Council aims to establish an assurance framework embedded into its business processes that maps strategic objectives to risks, controls and assurances. Such a framework will provide members with assurances to support the Governance Statement, and will help members to identify whether all strategic objectives and significant business risks are being addressed.
- 3.6 The Council's corporate governance objectives are to:

Work both for and with the community in an open and effective manner, taking account of the views of all of its stakeholders, regularly reporting on its activities, performance and financial position and maintaining the highest standards of integrity in all its dealings with the community.

Ensure that service delivery arrangements secure continuous improvement of services and that agreed policies, priorities and decisions are implemented on time, in a manner consistent with the needs of users and in the most efficient and effective way.

Maintain effective political and managerial structures and processes to govern decision-making and the strategic management of the Council, clarify members' and officers' roles and responsibilities and ensure proper scrutiny of all aspects of performance and effectiveness.

Exercise the highest standards of care and control over the assets and resources available, ensuring that these are protected from the risk of loss, damage or misuse, are used in the most efficient, effective and economic way and services are delivered in a way that represents the best value for money achievable.

Ensure that the highest standards of professionalism and integrity are maintained and that all those associated with the Council demonstrate leadership and commitment in conducting the affairs of the Council in an open and accountable manner.

- 3.7 The CIPFA/SOLACE Framework/Guidance identifies five aspects of the Council's business that should be covered by the Code:

Community Focus
Service Delivery Arrangements
Structures and Processes
Risk Management & Internal Control
Standards of Conduct

These are recorded in appendices 2 to 6 and lists how these are to be achieved.

4 GOVERNANCE STATEMENT

- 4.1 The preparation and publication of an Annual Governance Statement in accordance with this Code and the framework is necessary to meet the statutory requirement set out in Regulation 4(2) of the Accounts and Audit Regulations 2003, as amended by the Accounts and Audit (Amendment) (England) Regulations 2006. This requires the Council to "conduct a review at least once in a year of the effectiveness of its system of internal control" and to prepare a statement on internal control "in accordance with proper practices".
- 4.2 Regulation 6 of the legislation requires required bodies to review the effectiveness of their system of internal audit once a year and for the findings of the review to be considered by a committee of the body, or by the body as a whole. This will be covered within the Head of Audit's annual audit report to the Audit and Governance Committee.
- 4.3 It is mandatory to prepare an Annual Governance Statement (AGS) and this will include an action plan to address any significant governance and internal control issues. There is no requirement to prepare and publish a separate statement on internal control.
- 4.4 The Council is committed to preparing annually an AGS in order to report publicly on the extent to which the Council complies with this Code and best practice as set out in the CIPFA/SOLACE Framework, including how the effectiveness of governance arrangements has been monitored during the year, and on any planned changes in the coming period.
- 4.5 Following each yearly review, the Code will be updated to include any amendments necessary to ensure the commitments contained in it

remain up to date and an action plan produced to address any areas where the reviews have identified scope for future improvement.

- 4.6 The results of the reviews will be reported both internally to the Audit and Governance Committee and externally with the published accounts. This will provide assurance that:

Governance arrangements are adequate and operating effectively.

Where gaps are revealed, action is planned that will ensure more effective governance.

- 4.7 It is important to recognise that the AGS covers all significant corporate systems, processes and controls, spanning the whole range of the Council's activities, including in particular those designed to ensure that :

The Council's policies are implemented in practice and high-quality services are delivered efficiently and effectively.

The Council's values and ethical standards are met.

Laws and regulations are complied with and required processes adhered to.

Financial statements and other published performance information are accurate and reliable.

Human, financial, environmental and other resources are managed efficiently and effectively.

- 4.8 The AGS will include the following information:

An acknowledgement of the responsibility for ensuring there is a sound system of governance (incorporating the system of internal control).

An indication of the level of assurance that the systems and processes that comprise the Council's governance arrangements can provide.

A brief description of the key elements of the governance framework.

A brief description of the process that has been applied in maintaining and reviewing the effectiveness of the governance arrangements, including some comment on the role of the:

Council, Executive, Audit & Governance Committee, scrutiny function, risk management and Standards Committee.

Internal Audit Service.

Other review/assurance mechanisms

An outline of the actions taken, or proposed, to deal with significant governance issues, including an agreed action plan.

- 4.9 After the updated Code has been approved the Leader of the Council and the Chief Executive will sign a 'Statement of Assurance' that the Council's corporate governance arrangements, as set out in the Code, are adequate and where those arrangements are in place they are operating effectively.
- 4.10 The AGS will be produced by the Risk and Internal Control Group, approved by the Audit and Governance Committee and published with the financial statements. Whilst there is no statutory timetable for this approval, to comply with the Accounts and Audit Regulations the AGS must be published with the Council's financial statements.
- 4.11 In reviewing and approving the AGS, members will require assurances on the effectiveness of the governance framework, in particular the system of internal control, and how these address the key risks faced by the Council. Those assurances will be made available from a wide range of sources, including internal and external audit, external inspectorates and managers across the Council.
- 4.12 Management provides the primary source of assurance but an effective internal audit function will also be a significant source of assurance. The Head of Audit has been given the responsibility to review and report independently to the Audit and Governance Committee annually to provide an opinion on the adequacy and effectiveness of the Code and any significant areas of non-compliance.

5 THE GOVERNANCE FRAMEWORK

- 5.1 The governance framework comprises the systems, processes, culture and values, by which the Council is directed and controlled and its activities through which it accounts to, engages with and leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services.
- 5.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It is based on an ongoing process designed to identify and prioritise:

The risks to the achievement of policies, aims and objectives.

The likelihood of those risks being realised.

The impact should they be realised.

The means to manage them efficiently, effectively and economically will be evaluated.

5.3 It cannot eliminate all risk of failure to achieve policies, aims and objectives and can only provide reasonable and not absolute assurance of the effectiveness of the internal control environment.

5.4 To be effective the governance framework will demonstrate:

A clear vision of the Council's purpose and intended outcomes for citizens and service users that is clearly communicated, both within the Council and to all its stakeholders.

Arrangements are in place to review the Council's vision and its implications for governance arrangements.

Arrangements exist for measuring the quality of services for users, to ensure they are delivered in accordance with the Council's objectives and that they represent the best use of resources.

Roles and responsibilities of the executive, non-executive, scrutiny and officer functions are clearly defined and documented, with clear delegation arrangements and protocols for effective communication.

Codes of conduct for members and officers are in place, conform to appropriate ethical standards, and are communicated and embedded across the organisation.

Standing orders, financial regulations, scheme of delegation and supporting procedure notes and manuals are reviewed and updated as appropriate and clearly define how decisions are taken and the processes and controls required to manage risks.

Arrangements exist to ensure compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful.

All reports are considered for legal issues before submission to members.

Arrangements for whistle blowing and receiving and investigating complaints from the public are in place and are well publicised.

Arrangements exist for identifying the development needs of members and senior officers in relation to their strategic roles.

Clear channels of communication have been established with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation.

Governance arrangements with respect to partnerships and other group working incorporate good practice as identified by the Audit

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Commission's report on the governance of partnerships, and are reflected in the Council's overall governance arrangements.

Appendix 1

Core principle (CP1)

Focusing on the purpose of the Council and on outcomes for the community, including citizens and service users, and creating and implementing a vision for the local area.

Supporting principles:

Exercising leadership by clearly communicating the Council's purpose and vision and its intended outcome for citizens and service users.

Ensuring that users receive a high quality of service whether direct or in partnership or by commissioning.

Ensuring that the Council makes best use of resources and that council taxpayers and service users receive excellent value for money.

Core principle (CP2)

Members and officers working together to achieve a common purpose with clearly defined functions and roles.

Supporting principle:

Ensuring effective leadership throughout the Council by being clear about executive and non-executive functions and the roles and responsibilities of the scrutiny function.

Ensuring that a constructive working relationship exists between members and officers and that the responsibilities of members and officers are carried out to a high standard.

Ensuring relationships between the Council and the public are clear so that each know what to expect of the other.

Core principle (CP3)

Promoting the values of the Council and demonstrating the values of good governance through behaviour.

Supporting Principles:

Ensuring members and officers exercise leadership by behaving in ways that uphold high standards of conduct and exemplify effective governance.

Ensuring that organisational values are put into practice and are effective.

Core principle (CP4)

Taking informed and transparent decisions, which are subject to effective scrutiny and managing risk.

Supporting principles:

Exercising leadership by being rigorous and transparent about how decisions are taken, and listening and acting on the outcome of constructive scrutiny.

Having good quality information, advice and support to ensure services are delivered effectively and are what the community wants and needs.

Making sure that an effective risk management system is in place.

Recognising the limits of lawful action and observing both the specific requirements of legislation and the general responsibilities placed on the Council by public law, but also accepting responsibility to use its legal powers to the full benefit of the citizens and communities in its area.

Core principle (CP5)

Developing the capacity and capability of members to be effective and ensuring that officers, including the statutory officers, have the capability and capacity to deliver effectively.

Supporting principles:

Making sure that members and officers have the skills, knowledge, experience and resources they need to perform well in their roles.

Developing the capability of people with governance responsibilities and evaluating their performance, as individuals and as a group.

Encouraging new talent for membership of the Council so that best use can be made of resources in balancing continuity and renewal.

Core principle (CP6)

Engaging with local people and other stakeholders to ensure robust local public accountability.

Supporting principles:

Exercising leadership through a robust scrutiny function, which effectively engages local people and all local institutional stakeholders including partnerships, and develops constructive accountability relationships.

Taking an active and planned approach to dialogue with and accountability to the public to ensure effective and appropriate service delivery.

Making best use of resources by taking an active and planned approach to meet responsibility to staff.

Appendix 2

COMMUNITY FOCUS

The Council is committed through the carrying out of its general and specific duties and responsibilities and its ability to exert wider influence, to:

Work for and with its communities.
Exercise leadership in its communities, where this is appropriate.

In order to achieve this the Council will:

Publish on a timely basis a summarised annual report presenting an objective, understandable account of its financial position and performance.

Publish on a timely basis an objective, balanced and understandable account and assessment of its current performance and plans to maintain and improve service delivery.

Put in place proper arrangements for the independent review of the financial and operational reporting processes.

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.

Make an explicit commitment to openness in all of its dealings, subject only to the need to preserve confidentiality in those specific circumstances where it is proper and appropriate to do so.

Establish clear channels of communication with all sections of the community and other stakeholders, and put in place proper monitoring arrangements to ensure that they operate effectively.

Ensure that 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.

The Council has developed its public reporting arrangements by:

Ensuring quarterly reporting to the Executive and the Scrutiny Committee of the Council's financial position, as part of an integrated performance and financial report.

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Incorporating in its annual Statement of Accounts a statement from the Head of Corporate Finance that proper practices have been followed in preparing the accounts. The Statement of Accounts will also include a Governance Statement signed by the Leader of the Council and the Chief Executive that addresses the effectiveness of the Council's system for internal control across all areas of risk. In addition, the Head of Audit and External Auditor report annually to the Audit and Governance Committee on the review of the internal control environment.

Reporting quarterly to the Council's Executive on the key corporate risks facing the Council, and how those risks are being managed.

Proper arrangements are in place for the independent review of the financial and operational reporting processes. In particular:

The External Auditor issues an annual audit letter on the Council's activities.

The Council has established an Audit and Governance Committee to provide proactive and effective leadership on audit and governance issues.

The Internal Audit Service carries out reviews across all the Council's activities, both financial and non-financial, report quarterly on the results of all of its work to the Audit and Governance Committee.

The Council is subject to regular external inspection by a range of statutory inspectors.

The Council has established through its Scrutiny Committee and Review Panels arrangements for the scrutiny and review of the exercise of its functions and processes.

The Council has made it clear in its Constitution of its commitment to openness in all its decisions, in particular there is the presumption that all decisions made by the Council, the Executive, Committees and Review Panels will be made public, subject only to the need to preserve confidentiality in those specific circumstances where it is proper and appropriate to do so.

SERVICE DELIVERY ARRANGEMENTS

The Council is committed to seeking continuous improvement in the way it provides its services through.

The preparation and annual review of its Plan, focusing on priorities for the Council and financial implications over the period of the Plan.

The preparation of Annual Business and Service Plans incorporating a full range of performance targets for the delivery of services on a sustainable basis and with reference to equality policies.

Monitoring and reporting performance against agreed standards and targets and developing a comprehensive and understandable performance plan.

Developing a value for money strategy, with an annual assessment of each service.

Developing effective relationships and partnerships with other public sector agencies and the private and voluntary sectors.

Responding positively to the findings and recommendations of the External Auditor and other the statutory inspectors and put in place arrangements for the effective implementation of agreed actions.

Put in place arrangements to allocate resources according to priorities.

Fostering effective relationships and partnerships with other public sector agencies and the private and voluntary sectors, and consider the delivery of services in partnership with such organisations where it is efficient and effective to do so.

Furthermore, the Council seeks to ensure continuous improvement in the delivery of its services on a sustainable basis and in accordance with its equal opportunity policies and Human Rights. It also has in place processes to ensure that key partnerships are operating effectively.

The Council ensures the implementation of agreed policies and the carrying out of decisions through:

Scrutiny and review processes.

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Annual budgets providing sufficient resources to be allocated to meet identified priorities.

Service planning (which includes managing performance, risks, assets and resources).

Performance monitoring and reporting.

Staff appraisal system in respect of which specific links to performance and performance indicators in Chief Officer appraisals have been instituted.

Appendix 4

STRUCTURES AND PROCESSES

The Council recognises the need to have effective political and management structures and processes to govern decision-making and the exercise of authority within the organisation.

To secure this the Council has adopted a protocol setting out the working relationships between its members and officers. The purpose of the protocol is to ensure the smooth running of the Council's processes. The protocol recognises the distinct role of members and officers and the relationship of officers with the whole Council, the Executive, the scrutiny function, individual members and party groups.

The Council has also adopted a constitution that:

- Clearly defines the role and responsibility of the Leader and Executive in particular makes it clear that they are responsible for providing effective strategic leadership to the Council and for ensuring that the Council successfully discharges its overall responsibilities for the activities of the organisation as a whole.

- Describes the allocation of functions between the various constituent parts of the Council and, in particular, defines those functions reserved to Full Council for decision, those matters which are not the responsibility of the Executive and are decided by the Council's Regulatory Committees and those matters which are delegated to the Council's Officers.

- Establishes through the Scrutiny Committee and Review Panels a robust overview and scrutiny role of the Council's activities.

- Ensures through financial regulations and the scheme of delegated powers that there is effective control over the day to day conduct of the Council's business by requiring member approval for non-routine decisions or decisions outside defined parameters.

- Makes clear the role of all members both in the formal decision making and policy development role and ensures through the members allowance scheme that they are remunerated for this work.

To assist all members in carrying out their responsibilities effectively arrangements are in place to ensure that they are properly trained for their roles and have access to all relevant information, advice and resources as necessary.

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The Council has ensured through its Constitution and conditions of employment that:

The Head of Corporate Finance, as the Council's statutory Section 151 officer, is responsible to the Council for ensuring that appropriate advice is given to it on all financial matters, for keeping proper financial records and accounts, and for maintaining an effective system of internal financial control.

The Head of Legal Services is the Council's Monitoring Officer and is responsible for ensuring that the Council acts lawfully and that the Council's constitution is followed.

The roles and responsibilities (corporate and operational) of all senior officers, together with the terms of their remuneration and review, are clearly defined in writing.

The Council is committed, through a requirement in the Constitution, to reviewing all of the above arrangements on an annual basis.

RISK MANAGEMENT AND INTERNAL CONTROL

The Council recognises the need to have in place and maintain a systematic strategy, framework and process for managing and auditing risk. To this end, the Council has in place a range of mechanisms.

The Council undertakes to ensure that trained and experienced people deliver services. The Council achieves this through adherence to its corporate standards on recruitment and selection; training and development; the appraisal system; organisation and job design; comprehensive job descriptions and person specifications; developed training plans; and the monitoring of individuals' performance.

The Council has put in place:

- Comprehensive scrutiny and policy review arrangements.

- Scheme of delegation that ensures that officers may only take decisions within agreed parameters.

- Standing Orders and Financial Regulations that ensure member involvement in proposals to incur expenditure outside defined limits.

- Annual reporting through a balanced and understandable statement and assessment of the Council's risk management and internal control mechanisms and their effectiveness.

The Council's Executive is responsible for ensuring that risk management is embedded throughout the Council. The Council has appointed a member and an officer risk champion, specifically tasked with ensuring that this happens.

The Council has also established an Audit and Governance Committee who consider the effectiveness of the Council's risk management arrangements.

The Council maintains an objective and professional relationship with the External Auditor and statutory inspectors, responding positively to their reports and the annual audit letter. In this respect, a Protocol has been developed between the Internal Audit Service and the external auditor.

The Council is developing a robust system for identifying and evaluating all significant risks to the Council and putting in place effective risk management systems together with effective arrangements for an objective review of risk management and internal control within the Council.

A Risk Management Strategy has been adopted and its implementation monitored by the Risk and Internal Control Group, which also monitors the

APPENDIX A

Corporate Risk Register. Operational risks are monitored by the Risk Management Group. Procedures are in place for each service to establish, maintain and monitor their own risk registers.

Appendix 6

STANDARDS OF CONDUCT

The Council recognises that the openness, integrity and accountability of individuals within a local authority form the corner stone of effective corporate governance. Also the Council's reputation depends on the standards of behaviour of everyone in it, whether members, employees or agents contracted to it.

Members and senior officers are expected to exercise leadership by conducting themselves as role models within the Council. As a result:

Councillors have adopted a Members Code of Conduct governing the conduct of all members and voting co-opted members of the Council.

A Standards Committee has been established with the responsibility for monitoring the operation of the member's Code and providing training and guidelines on it to all councillors.

Officers are subject to a Code of Conduct for Employees that includes a wide range of standards of behaviour required of them.

The Council has adopted an Anti-Fraud and Corruption Policy to:

Promote a culture of honesty and opposition to fraud and corruption within the Council.

Provide arrangements whereby concerns can be raised with senior officers on a confidential basis.

Ensure arrangements are in place for the prevention of fraud and corruption within the Council, including internal control mechanisms and effective recruitment procedures.

Set up basic principles to apply where instances of fraud are detected, including the involvement of the police and the taking of disciplinary measures

Remind staff to be alert to possible causes of fraud and corruption.

The Council has adopted a Whistleblowing policy to which all members of staff have access. A fundamental part of this is includes a confidential external reporting line.

The Monitoring Officer monitors the policy to:

Encourage staff, contractors and suppliers and partners to feel confident in raising serious allegations.

Provide avenues for people to raise those concerns and receive feedback on any action taken.

Ensure that people receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied.

Reassure those raising concerns that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have raised any concern in good faith.

The Council has adopted customer care standards supported by a complaints procedure that aims to:

Make it easy for anyone to make a complaint or a compliment.

Solve problems as close to where they occur as possible, and pass back compliments to the right people.

Prevent problems happening again and also encourage good practice.

Processes are in place to ensure the continued operation of arrangements for ensuring that members and employees are not influenced by prejudice, bias and conflicts of interest by:

Advising members on a regular basis of advice on the application of the Members' Code of Conduct.

Adopting a Code of Best Planning Practice.

Protocols dealing with gifts and hospitality and members' involvement in commercial transactions have also been adopted.

The Members Register of Interests is updated annually.

There is a formal opportunity for members at the beginning of all meetings to declare interests.

The requirements and terms of the various codes and policies are drawn to the attention of those who need to know about them in a variety of forms through:

Formal member training, in the case of the Members Code of Conduct

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Publicity of the Officers Code of Conduct, Whistleblowing policy and Anti-Fraud and Corruption policy on the Council's Intranet site

The Council's staff induction programme.