

Ethical Audit Desktop Analysis
Matrix of Key Information held by Swindon Borough Council - October 2020

No.	Key Information	Held	Current position, including action taken since the last review in November 2019	Area of review or action to be identified by the Standards Committee
1	Constitutions / Current Decision Making Framework	Yes	<p>Due to Covid-19, the Constitution was not reviewed or updated and the 2019/20 edition remains in use. A full review will be undertaken before 2021/22.</p> <p>The Constitution's operation is monitored by the Council's Monitoring Officer, and also by the Corporate Governance Review Working Group, whose recommendations feed into the review process.</p> <p>The Council's Audit Committee was first established in May 2006 and continues to operate effectively. It receives assurances from the Standards Committee in relation to the operation of the Whistleblowing Policy.</p> <p>The Annual Audit Letter summarises the key findings arising from the work carried out by the External Auditor. The Annual Audit Letter for 2019/20 will be received on completion of the 2019/20 audit of the accounts. This is expected November 2020, which is later than previous years due to the impact of Covid-19.</p>	
2	Procedural Standing Orders	Yes	Due to Covid-19, the Constitution was not reviewed or updated and the 2019/20 edition remains in use. A full review will be undertaken before 2021/22.	
3	Contracts Standing Orders	Yes	Due to Covid-19, the Constitution was not reviewed or updated and the 2019/20 edition remains in use. A full review will be undertaken before 2021/22.	

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4	Employees' Code Of Conduct	Yes	<p>Following consultation with Council employees and unions, the Employee Code of Conduct was initially approved by the Standards Committee in July 2006. The Code of Conduct is available to all Council employees on the intranet, who are required to read and abide by it.</p> <p>The Code of Conduct is intended to:</p> <ul style="list-style-type: none"> • help officers to understand how they can fulfil their ethical obligations in performing their role. • set clear expectations for their conduct as a public employee in the Council. • provide guidance to help them deal properly with ethical issues they might encounter in their work. <p>The Code is submitted to Council annually for approval. The 2019/20 edition remains in use. A full review will be undertaken before 2021/22.</p>	
5	Members' Code Of Conduct	Yes	<p>The Members Code of Conduct was adopted in June 2012, taking effect on 1 July 2012, under the Localism Act 2011. The Code is reviewed annually. A full review of the Code needs to be undertaken to take into account the recommendations of the Report on Standards in Public Life in January 2019. This has not been undertaken due to virus, but will be done in the coming months.</p> <p>Procedures for determining complaints against councillors were the subject of review during the 2013/14 and 2014/15 Municipal Years. A number of changes to the "Arrangements for dealing with member Code of Conduct complaints" were agreed by Standards Committee at its meeting on 21 July 2014 and these</p>	

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			<p>were incorporated into the process.</p> <p>The Monitoring Officer has provided guidance where requested on the Members Code of Conduct to Members, together with Parish Clerks and Parish Councillors. Formal training was not provided in June 2020 due to Covid-19 but will be recommended and arranged at suitable time.</p>	
6	Confidential Reporting Procedure	Yes	<p>The Whistleblowing Policy was first approved in November 2001. It is reviewed on a regular basis to ensure that it complies with legislation and best practice.</p> <p>The approved Whistleblowing Policy is publicised through staff communications.</p> <p>Complaints received are investigated and the outcomes reported to the Standards Committee.</p> <p>In September 2005, the Committee approved the Council's subscription to the Public Concern at Work Helpline (now known as 'Protect') to provide a formal method of confidential reporting for staff who do not feel able to raise issues directly with the Council. The Council has maintained this provision, but also makes available the following support via a contract with Care First, the Council's employee assistance programme:</p> <ul style="list-style-type: none"> • An advice and information service • A counselling service • On-line information • A manager support service 	

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7	Terms Of Reference of the Standards Committee	Yes	The current Standards Committee was established in July 2012, under the terms of the Localism Act 2011, giving Councils the option of whether to retain a Standards Committee or nominate another Committee to oversee the determination of Code of Conduct complaints. The Borough Council's Standards Committee retained much of its extended terms of reference, beyond the determination of complaints, in particular in relation to its monitoring of Anti-Fraud and Corruption Strategy and Whistleblowing Complaints.	
8	Scheme Of Delegation	Yes	The Scheme of Delegations was reviewed and updated early in 2020. Further updates and additional powers to enforce Covid-10 have been approved using authority delegated to the Chief Legal Officer by Council and in consultation with the Members of the Corporate Governance Review Working group.	
9	Members' Register Of Interests	Yes	Held on file and on the Council's website. Regular reminders are issued. In accordance with the requirements of the Localism Act, the Council also now publishes Register of Interest forms for all Parish Councillors in the Borough Area.	
10	Recorded Declaration Of Interests	Yes	Interests are recorded at meetings and are recorded on the website.	
11	Members' Induction Process	Yes	All new Councillors are provided with a comprehensive induction programme in relation to the ethical framework and the decision-making process, as well as service specific issues. Attendance at the induction programme	

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			<p>is monitored to ensure all new members are properly inducted.</p> <p>New Councillors elected in by-elections attend induction training following their election.</p> <p>As a consequence of the Government's Covid-19 Regulations, there have been no elections in 2020.</p>	
12	Officers' Induction Process	Yes	<p>A corporate induction process is in place and departmental induction processes are also in place.</p> <p>Reference is included in the Officers' Induction Process to the ethical framework. During staff induction, it is checked that staff are aware of the Code of Conduct, and they are reminded that it is their responsibility to read it and speak with their manager if they have any concerns. Staff are also advised of the disclosure of gifts requirements, and are also advised to contact their managers with any concerns regarding this, or any special arrangements made (for example, working in a care home at Christmas where people may buy them lots of gifts/goodies).</p> <p>It is the responsibility of managers to enforce the Code of Conduct and ethics and probity issues with staff.</p>	
13	Members' Continuing Development and Training	Yes	<p>A range of development / training opportunities are offered and a record of attendance kept.</p> <p>Training for Councillors is facilitated by Committee and Member Services, in consultation with a cross-party</p>	

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			Member Development Advisory Group. This agrees the programme for training at the beginning of each year and monitors the success of each course and the uptake from Councillors.	
14	Officers' Continuing Development	Yes	There are a number of documents which relate to the development and performance culture of the Council, and which set out the values and behaviours expected. The current appraisal information can be found on the intranet. Every role profile also includes the Council's values and behaviours, and forms part of the contract of employment.	
15	Officers' Training	Yes	The Council has an online Learning & Development resource which provides practical learning and development materials. It includes mandatory E-learning modules as well as a number of useful resources to support staff. Information about available courses is accessed via ESS (Employee Self-Serve) and bookings can also be made through ESS.	
16	Other Council Specific Additional Codes And Protocols	Yes	<p><u>Monitoring Officer Protocol</u> - last reviewed and updated in January 2020. The 2019/20 edition remains in use. A full review will be undertaken before 2021/22.</p> <p><u>Guidance to Councillors on Dealing with the Media</u> – first adopted February 2002, and last reviewed and updated in January 2020. The 2019/20 edition remains in use. A full review will be undertaken before 2021/22.</p> <p><u>Protocol on Member / Officer Relations</u> - introduced September 2002, and last reviewed and updated in January 2020. The 2019/20 edition remains in use. A full</p>	

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			<p>review will be undertaken before 2021/22.</p> <p><u>Members' Planning Code of Good Practice</u> – first adopted February 2004, and last reviewed and updated in January 2020. The 2019/20 edition remains in use. A full review will be undertaken before 2021/22.</p> <p>Anti-Fraud and Bribery Strategy – adopted November 2001 and regularly reviewed and updated. The strategy sets out best practice and complies with relevant legislation. A Fraud Response plan was developed by Internal Audit at the same time to assist managers in knowing how to deal with allegations of wrongdoing.</p> <p>The outcome of Whistleblowing investigations are reported to the Standards Committee.</p> <p>Fraud alerts are issued highlighting specific frauds or scams as and when they arise.</p>	