

Ethical Audit Desktop Analysis
Matrix of Key Information held by Swindon Borough Council
October 2014

	Key Information	Held	Current position, including action taken since the last review in October 2013.	Area of Review or Action to be identified by the Standards Committee.
1	Constitutions/ Current Decision Making Framework (ie the committees and sub-committees)	Yes	<p>The Constitution is reviewed and updated at least annually and was last adopted in June 2014.</p> <p>The Constitution's operation is monitored by the Monitoring Officer and also by the Corporate Governance Working Party 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 matters of internal control such as the operation of the Whistleblowing Policy.</p> <p>The Annual Audit letter for 2013/14 confirmed that the 'Governance arrangements' of the Council were sound and operating effectively..</p> <p>The Council is increasingly working with external partners and stakeholders. Many of the Council's partnership relationships are now managed through the One Swindon Leadership Board, with appropriate governance arrangements in place.</p>	
2	Procedural Standing Orders	Yes	Updated in Constitution – June 2014	
3	Contracts Standing Orders	Yes	Updated in Constitution – June 2014	
4	Employees' Code Of Conduct	Yes	Following consultation with Council employees and	

			<p>unions, the Employee Code of Conduct was approved by the Standards Committee in July 2006. The Code of Conduct is issued to all Council employees, who are required to sign to confirm that they have read and will act in accordance with the Code.</p> <p>A statutory Code was consulted on in October 2008 by the Department of Communities and Local Government, but no further action has been taken on this matter.</p>	
5	Members' Code Of Conduct plus Local Guidance	Yes	<p>The new 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. It was last reviewed in January 2014 and subsequently adopted at the Annual Council meeting in June 2014.</p> <p>Procedures for determining complaints against councillors were the subject of review during the 2013/14 Municipal Year. 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 have now been incorporated into the process.</p> <p>The Monitoring Officer has provided guidance and training on the Members Code of Conduct to Officers and Members, together with Parish Clerks and Parish Councillors. Refresher training is also regularly provided.</p>	.
6	Confidential Reporting Procedure	Yes	<p>The Whistleblowing Policy was first approved in November 2001 and is kept under regular review.</p> <p>Complaints received are investigated and the outcome reported to the Standards Committee. Employees are reminded about the procedure via staff communications, including Team Briefings.</p> <p>In September 2005, the Committee approved the</p>	

			<p>Council's subscription to the Public Concern at Work Helpline 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 	
7	Terms Of Reference of the Standards Committee	Yes	<p>The new Standards Committee was put in place 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.</p>	
8	Scheme Of Delegation	Yes	<p>This was updated by June 2014 to take account of the revised management structures and subsequently approved as part of the 2014/15 Constitution at the meeting of Annual Council meeting in June 2014.</p>	
9	Members' Register Of Interests	Yes	<p>Held on file and on the Council's website. Regular reminders are issued.</p> <p>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.</p>	

10	Recorded Declaration Of Interests	Yes	Interests are recorded at meetings and are recorded on the website.	
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11	Members' Induction Process	Yes	<p>All new Councillors are provided with a comprehensive induction programme.</p> <p>New Councillors elected in by elections attend Induction training following their election.</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 have received a copy of the code of conduct (which they usually have with their contracts) 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 etc information, 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> <p>The Monitoring Officer liaises with the Head of People and Development on evaluating the implementation across departments of training on the ethical framework within the Officers' Induction Programme and on the monitoring of the officer induction process.</p>	
13 / 14	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 Member Development Advisory. This agrees the programme for training at the beginning of each year,</p>	

			and monitors the success of each course and the uptake from Councillors.	
15	Officers' Continuing Development	Yes	The Council's behaviour framework sets out the values and behaviours expected from officers and members. This currently forms part of the annual appraisal in place across the Council, and identifies development needs and provides structured options to accessing appropriate training.	
16	Officers' Training	Yes	A Learning & Development online resource has been launched, which provides practical learning and development materials. There is also a Learning Zone with links to coaching and networking e-learning modules developed by Good Practice. Other courses are available direct.	
17	Other Council Specific Additional Codes And Protocols		<p><u>Monitoring Officer Protocol</u> - Adopted in December 2003 and last reviewed in January 2014</p> <p><u>Guidance to Councillors on Dealing with the Media</u> – first adopted February 2002, and last reviewed and updated by the Committee in January 2014</p> <p><u>Protocol on Member / Officer Relations</u> - Introduced September 2002 and regularly reviewed and updated. This was last updated in January 2014. The Association of Secretaries and Solicitors (ACSeS) produced a model code, some of which is based on this Council's protocol.</p> <p><u>Members' Planning Code of Good Practice</u> - adopted February 2004, and regularly reviewed and updated. This was last amended in January 2012 to reflect the new rules in relation to Pre-Determination of Decisions under the Localism Act 2011.</p>	

			<p><u>Anti-Fraud and Bribery Strategy</u> – adopted November 2001 and regularly reviewed and updated. The strategy is reviewed annually to ensure that it 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. The outcome of investigations are reported to the Standards Committee.</p> <p>A Swindon Internal Audit Services Bulletin is issued to Members and Officers approximately twice a year to promote fraud awareness by communicating information on frauds elsewhere to officers and Members, and enable similar frauds to be prevented.</p>	
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