

Code of Corporate Governance



Introduction

Corporate governance is a term used to describe the way that organisations direct and control what they do. For local authorities, it includes the systems, policies and processes, as well as the cultures and values, that underpin a council's arrangements for effective:

- leadership
- management
- performance
- delivery of positive customer outcomes
- community engagement
- stewardship of public money

The Sandwell Vision 2030



In 2030, Sandwell is a thriving, optimistic and resilient community. It's where we call home and where we're proud to belong - where we choose to bring up our families, where we feel safe and cared for, enjoying good health, rewarding work, feeling connected and valued in our neighbourhoods and communities, confident in the future, and benefiting fully from a revitalised West Midlands.

The Sandwell Vision is at the heart of everything the council does. This Code of Corporate Governance will contribute to the ambitions that make up the vision by ensuring that a strong governance framework is in place and underpins everything the council does.

Good Corporate Governance

Sandwell Council is committed to achieving good corporate governance and this Code describes how the council intends to achieve this in an open and explicit way. In developing this Code, the council has considered best practice and guidance, particularly the seven core principles of the CIPFA/SOLACE framework "Delivering Good Governance in Local Government".

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.
- Ensuring openness and comprehensive stakeholder engagement.
- Defining outcomes in terms of sustainable economic, social, and environmental benefits.
- Determining the interventions necessary to optimise the achievement of the intended outcomes.
- Developing the entity's capacity, including the capability of its leadership and the individuals within it.
- Managing risks and performance through robust internal control and strong public financial management.
- Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

However, the Code is purposefully written in a way that best reflects the council's own structure, functions, size and the governance arrangements in existence.

The Sandwell position

Sandwell embraces the seven principles with clear lines of accountability for any decisions it makes, and clear rules, regulations, policies and practices which govern how those decisions are made and implemented.

The council has adopted the strong 'leader and cabinet' form of executive arrangement under the Local Government and Public Involvement in Health Act 2007 with a Cabinet of ten Elected Members, meeting in public to make executive decisions on matters of strategy and borough-wide significance. Each Cabinet Member also has a portfolio of responsibility for the delivery of services for which he/she is personally accountable. The council's practices are underpinned by three overarching principles:

Respect for others	Elected Members should promote equality by not discriminating unlawfully against any person and by treating people with respect, regardless of their sex, sexual orientation, gender reassignment, race, religion and belief, disability, age, marriage and civil partnership. They should respect the impartiality and integrity of the council's statutory officers and its other employees.
Duty to uphold the law	Elected Members should uphold the law and on all occasions, act in accordance with the trust that the public has entrusted in them.
Stewardship	Elected Members should do whatever they are able to do to ensure that the council uses its resources prudently and in accordance with the law.

Putting the principles into practice in Sandwell

Sandwell Council is confident that its governance arrangements are robust. The council recognises, however, that there is always room for improvement and progress, especially as the council continues to evolve to deliver extensive change and to meet rising government and customer expectations about the quality and responsiveness of services.

The council has established a Corporate Governance Board, which includes senior officers from across the council including finance, HR, ICT, audit, risk management, legal and procurement. As part of its role each year the Board:

- Assesses to what extent the council complies with the principles and requirements of good governance as set out in the CIPFA/SOLACE framework.
- Identifies systems, processes and documentation that provide evidence of compliance.
- Identifies the officers, Elected Members and bodies responsible for monitoring and reviewing the systems, processes and documentation identified.
- Identifies governance issues that have not been addressed adequately and what actions should be taken and by whom; and draws up and monitors an action plan.
- Co-ordinates and drives continuous improvement through raising awareness and understanding of governance and the council's governance arrangements.
- Reports to the Executive Management Team with the assurances it has obtained in respect of the council's governance arrangements.



The council is required to confirm whether its financial management arrangements conform to the governance requirements of the CIPFA Statement on the Role of the Chief Financial Officer in Local Government. The statement sets out five principles which define the core activities and behaviours that belong to the role of the Chief Financial Officer and the organisational arrangements needed to support them. The council is able to confirm that its financial management arrangements do conform. The Chief Financial Officer has been involved in preparing this statement and is satisfied that no matters of significance have been omitted from this statement.

The council has embedded effective standards for countering fraud and corruption through the adoption of and adherence to the CIPFA Code of Practice on Managing the Risk of Fraud and Corruption. The Code is based on five principles and having considered these, the council is satisfied that the organisation has adopted a response that is appropriate for its fraud and corruption risks and commits to maintain its vigilance to tackle fraud.



Monitoring, Review and Changes

The council's commitment to good corporate governance includes the application, development and maintenance of this Code. This is undertaken by the council's Corporate Governance Board (the Board) which reports to the Executive Management Team. The Board is responsible for monitoring and reviewing the effectiveness of the governance framework and identifying any issues and agreeing an action plan. The results of this review are contained in the Annual Governance Statement which is reported to the Audit and Risk Assurance Committee and published with the Annual Statement of Accounts. The role of the Committee is to understand the process undertaken to review governance and to ensure that the Statement aligns with its understanding of the effectiveness of the council's governance framework. The Committee is also responsible for obtaining assurances that the measures within the action plan to improve governance are addressed and implemented.

Any changes that are required to this Code resulting from its review, will be submitted to the council for approval.



Councillor Steve Eling
Leader of the Council



Jan Britton
Chief Executive

Principle 1: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice

- Ensuring Elected Members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation
- Ensuring Elected Members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles)
- Leading by example and using these standard operating principles or values as a framework for decision making and other actions
- Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively
- Seeking to establish, monitor and maintain the organisation's ethical standards and performance
- Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation
- Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values
- Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with high ethical standards expected by the organisation
- Ensuring Elected Members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations

The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance

- The council's values and behaviours (Trust, Unity and Progress) guide and shape the council's culture and helps Elected Members and officers understand what is expected from them
- Codes of Conduct for officers and Elected Members and supplemented by guidance when serving on outside bodies including partnerships
- Completion of Cabinet Members' Assurance Statement, and Directors' Assurance Statements and individual sign off by Cabinet Members with regards to compliance with the Elected Member Code of Conduct
- Performance appraisal process for officers
- Register of interests for Elected Members and officers
- Declarations of interest sought and recorded annually
- Gifts and Hospitality policy
- Open and transparent decision-making arrangements, including an effective Audit and Risk Assurance Committee
- Robust and proper arrangements in place to ensure high standards of behaviour in dealing with the invitation of tenders and award of contracts and financial matters through effective Standing Orders, Financial Regulations and Procurement and Contract Procedure Rules
- The council's Modern Slavery policy and statement to ensure modern slavery is not taking place in any part of its own business or any of its supply chains
- Policies and processes on information management in place
- Confidential reporting code (whistleblowing policy) which allows employees, partners, contractors and the public to make

<ul style="list-style-type: none"> ▪ Creating the conditions to ensure that the statutory officers, other key post holders and Elected Members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements ▪ Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders ▪ Dealing with breaches of legal and regulatory provisions effectively ▪ Ensuring corruption and misuse of power are dealt with effectively 	<p>confidential complaints on matters of concern</p> <ul style="list-style-type: none"> ▪ The Standards and Member Development Committee promotes and maintains high standards of conduct and ethical governance by Elected Members and presents an Annual Report to the Council setting out how it has discharged its functions. The committee receives regular reports on allegations of Elected Member misconduct and the outcome of each complaint ▪ Complaints procedure and complaints about Councillor conduct ▪ Compliance with CIPFA's "Statement on the role of the Chief Officer in local government" which is reviewed on an annual basis ▪ Specific roles and responsibilities of Elected Members are detailed in the Constitution ▪ Each Committee has clear terms of reference which are reviewed on an annual basis ▪ Anti-Money Laundering and Anti-Fraud and Corruption policies ▪ Compliance with Data Protection requirements and related guidance ▪ Membership of various professional and advisory organisations (by both the council and professional officers) to help ensure up to date knowledge of legal and regulatory duties and responsibilities are maintained.
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Principle 2: Ensuring openness and comprehensive stakeholder engagement

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice

- Ensuring an open culture through demonstrating, documenting and communicating the organisation's commitment to openness
- Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided
- Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear
- Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/ courses of action
- Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably
- Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively
- Ensuring that partnerships are based on trust, a shared commitment to change, a culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit
- Establishing a clear policy on the type of issues that the organisation will meaningfully consult with to ensure that service (or other) provision is contributing towards the achievement of

The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance

- The council's Constitution outlines the way in which it is organised to carry out its functions, powers, duties and obligations. It explains the structures and decision making processes of the council and brings together in one document all the detailed rules and procedures that govern the behaviour of those who work for, or represent the council
- The Constitution sets out how the council is accountable to the local community and sets out the role of the scrutiny function in engagement with the public and partners
- Cabinet reports include details of engagement and consultation activity undertaken as part of the decision-making process
- A Scrutiny Annual Report is produced and individual scrutiny review reports are also undertaken and published
- Electronic communications and use of social media (Facebook, Twitter, YouTube, etc.)
- Statutory Notices are published on a monthly basis and set out what key decisions the council's Executive is going to make
- The Committee Management Information System (CMIS) allows members of the public to examine agendas, reports, minutes and decisions of any meeting via the council's web site
- Full Council, Cabinet and certain committee meetings are webcast
- Reporting guidelines ensure consultation with all relevant officers takes place prior to submitting decision making reports
- Sandwell's Elected Member level decisions are taken in a public forum, either at a formal meeting or as individual Cabinet Members at a pre-advertised time and place so that the public and/or other Elected Members of the council can attend. Decisions are only made in private if a report contains exempt information as defined

intended outcomes.

- Ensuring that communication methods are effective and that Elected Members and officers are clear about their roles with regard to community engagement
- Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs
- Implementing effective feedback mechanisms to demonstrate how views have been taken into account
- Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity
- Taking account of the interests of future generations of tax payers and service users

by Schedule 12A of the Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) Order 2006

- The Freedom of Information policy and Publication Scheme
- Council's compliance with the data transparency agenda includes publication of all expenditure in excess of £500 and all spend on procurement cards
- Sandwell Trends provides data, intelligence and analysis of the people and places of Sandwell to inform decision making
- Protocol and procedure in place in line with the Localism Act 2011 for dealing with requests in relation to assets of community value
- The Sandwell Vision 2030 and Medium Term Financial Strategy set out the council's ambitions, plans, achievements and feedback from residents
- Communication with officers through team briefs, staff surveys, the intranet, social media, newsletters, blogs, express briefings and round table sessions with managers
- Communication with representative bodies is conducted through the service area Joint Consultative Committees and the corporate Joint Consultative Panel
- Council's attainment of Investors in People
- Database on council website of public consultations
- Consultation with targeted stakeholders for specific projects
- The MySandwell account allows residents to request services, report problems and track any enquiries they put in to the council
- Improving resource use through effective business planning and appropriate application of techniques such as benchmarking and other approaches in order to determine how resources are allocated to achieve outcomes effectively and efficiently
- Equality Impact Assessments

Principle 3: Defining outcomes in terms of sustainable economic, social, and environmental benefits

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice

- Having a clear vision, which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the organisation's overall strategy, planning and other decisions
- Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer
- Delivering defined outcomes on a sustainable basis within the resources that will be available
- Identifying and managing risks to the achievement of outcomes
- Managing service users' expectations effectively with regard to determining priorities and making the best use of the resources available
- Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision
- Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints
- Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs
- Ensuring fair access to services

The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance

- The council's business plan being developed will be based on needs of residents, and informed by the Sandwell Vision 2030, Business Planning Framework and the Medium Term Financial Strategy
- The Black Country Core Strategy makes a valuable contribution to shaping future development, improving the safety and security of the area and reducing crime and disorder within the Borough and is linked into the West Midlands Combined Authority Strategic Economic Plan
- Annual reports including Scrutiny, Audit, Safeguarding Boards, provide details of performance against service specific activities
- A Performance Management Framework will set out the range of measures against which progress against planned priorities will be measured and will be aligned to the Sandwell Vision 2030
- The MySandwell customer portal provides data derived from customer feedback for the use of service areas to direct improvements
- Value for money is assessed through External Audit, Audit and Risk Assurance Committee reviews, service reviews and other external inspections
- A Corporate Risk Management Strategy which identifies the key risks which may impact upon the delivery of key priorities
- Cabinet summit meetings regularly held to set the strategic direction and identify priorities in response to available resources, identified need, statistical evidence and citizen feedback
- Article 13 of the Constitution on Decision Making details the responsibilities for and principles of decision making within the council

Principle 4: Determining the interventions necessary to optimise the achievement of the intended outcomes

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice

- Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore, ensuring best value is achieved however services are provided
- Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts
- Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets
- Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered
- Considering and monitoring risks facing each partner when working collaboratively, including shared risks
- Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances
- Establishing appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured
- Ensuring capacity exists to generate the information required to review service quality regularly
- Preparing budgets in accordance with objectives, strategies and the medium term financial plan
- Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at

The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance

- Article 13 of the Constitution on decision making details the responsibilities for and principles of decision making within the council
- There are clear timescales for the submission of reports to Council, Cabinet and committee's and a compulsory consultation process to evidence the review of reports prior to submission to Elected Members
- The council's Medium Term Financial Strategy is updated annually. The strategy sets out how the council wishes to structure and manage its finances now and in the future and to ensure this approach facilitates delivery of the its vision, aims and objectives
- Directorates produce individual business plans which are reviewed annually and set out the vision and strategy for the service
- Electronic communications and use of social media (Facebook, Twitter, YouTube, etc.)
- Communication with staff is through team briefs, staff surveys, the intranet, social media, newsletters and blogs
- Communication with representative bodies is conducted through the service area Joint Consultative Committees and the corporate Joint Consultative Panel
- Partnerships are in place where the council has arrangements to deliver services jointly or through other organisations. The effectiveness of these arrangements is assessed through partnership boards or contract monitoring
- The council has a Corporate Risk Management Strategy which identifies the key risks which may impact upon the delivery of key services
- The Sandwell Vision 2030 and Medium Term Financial Strategy

developing a sustainable funding strategy

- Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints
- Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term
- Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage
- Ensuring the achievement of 'social value' through service planning and commissioning

set out the council's improvement plan, its achievements and feedback from residents

- The Sandwell Vision 2030 is based on needs of residents
- Annual reports including Scrutiny, Audit, Safeguarding, provide details of performance against service specific activities
- A Performance Management Framework will set out the range of measures against which progress against planned priorities will be measured and will be aligned to the Sandwell Vision 2030
- The council has guidance for compliance with the Public Services (Social Value) Act 2012. The Act requires all Public Services contracts above the OJEU threshold to be subject to appropriate social value criteria. While the Act is only compulsory for this category of contracts it was agreed that the council will consider social value criteria within all contracts
- Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently
- An Equality Impact Assessment is a compulsory consideration for all cabinet reports

Principle 5: Developing the entity's capacity, including the capability of its leadership and the individuals within it

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice

- Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained
- Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body
- Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads in implementing strategy and managing the delivery of services and other outputs set by Elected Members and each provides a check and a balance for each other's authority
- Developing the capabilities of Elected Members and senior management to achieve effective leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by:
 - ensuring Elected Members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged
 - ensuring Elected Members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis
 - ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external

The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance

- Corporate Peer Review to take place in 2018
- Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources, including, Planned Leavers, Sandwell Graduate Programme, Modern Apprenticeship programme and the Sandwell Guarantee
- Elected Member induction, training and development programme
- Job descriptions and delegations for statutory officers
- The council-wide appraisal process and suite of policies to manage employee performance
- Assessment against CIPFA's "Role of the Chief Financial Officer" and the "Role of the Head of Audit"
- External inspections including Ofsted and external audit assess the capability and capacity of senior officers
- Engagement in national and local benchmarking exercises
- Annual employee engagement survey
- Establishment of apprenticeship and work placement, and intern and graduate programmes
- Youth Parliament which encourages young people to engage with the council and its decision-making process
- Corporate learning and development programme
- Annual reports including Scrutiny, Audit, Safeguarding, provide details of performance against service specific activities
- The roles and responsibilities of the executive are set out in the council's Constitution, including the scheme of delegation
- Regular briefings between the Leader and the Chief Executive
- Protocol for Elected Member/Officer Relations included within the council's constitution

<ul style="list-style-type: none">– ensuring that there are structures in place to encourage public participation▪ Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections▪ Holding staff to account through regular performance reviews which take account of training or development needs▪ Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing	<ul style="list-style-type: none">▪ Management Board has a defined role and area of responsibility and all senior officers have job descriptions which set out respective responsibilities and accountabilities▪ Induction programme for staff and ongoing appraisal, training and development▪ Suite of clear policies and support mechanisms in place to maintain the health and wellbeing of its workforce, including access to Occupational Health, counselling, flexible working
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Principle 6: Managing risks and performance through robust internal control and strong public financial management

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice

- Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making
- Implementing robust and integrated risk management arrangements and ensuring that they are working effectively
- Ensuring that responsibilities for managing individual risks are clearly allocated
- Monitoring service delivery effectively including planning, specification, execution and independent post implementation review
- Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation's financial, social and environmental position and outlook
- Ensuring an effective scrutiny or oversight function is in place which provides constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the organisation's performance and that of any organisation for which it is responsible (Or, for a committee system) Encouraging effective and constructive challenge and debate on policies and objectives to support balanced and effective decision making
- Providing Elected Members and senior management with regular reports on service delivery plans and on progress towards outcome achievement
- Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements)
- Aligning the risk management strategy and policies on internal

The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance

- The corporate risk management policy and strategy sets out the processes in place to manage risk across the organisation and the roles and responsibilities of officers and Elected Members in this respect
- Partnerships are in place where the council has arrangements to deliver services jointly or through other organisations. The effectiveness of these arrangements is assessed through partnership boards or contract monitoring
- Regular reports including annual Scrutiny, Audit, Safeguarding reports and quarterly monitoring reports from Children's Services Commissioner which provide details of performance against service specific activities
- A Performance Management Framework will set out the range of measures against which progress against planned priorities will be measured and will be aligned to the Sandwell Vision 2030
- The Constitution contains a section on decision making which details the responsibilities for and principles of decision making within the council
- The Committee Management Information System on the council's website advertises when committee meetings will take place and publicises the agenda, reports (unless designated private) and minutes of the meeting
- Detailed Scrutiny arrangements
- Decision making reports have a standard template ensuring that the risks, resources, legal and Vision 2030 implications of the decisions are explicit
- The council's Constitution states that it will exercise all its powers and fulfil its duties in accordance with the law and the Constitution

control with achieving objectives

- Evaluating and monitoring risk management and internal control on a regular basis
- Ensuring effective counter fraud and anti-corruption arrangements are in place
- Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor
- Ensuring an audit committee or equivalent group/ function, which is independent of the executive and accountable to the governing body:
 - Provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment
 - That its recommendations are listened to and acted upon
- Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data
- Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies
- Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring
- Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance
- Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls

and the Monitoring Officer ensures that this is complied with

- The council has Financial Regulations and Procurement and Contract Procedure Rules and which are reviewed on a regular basis
- Appropriate Schemes of Delegation to Cabinet Members and Officers are in place
- Internal Audit function and Corporate counter-fraud function in place to provide independent assurance on risk areas. Assurance is based on completion of an annual internal plan, approved by the Audit and Risk Assurance Committee and presentation of progress reports and an annual report to the Committee
- An Annual Governance Statement, which is published with the Annual Statement of Accounts
- The Audit and Risk Assurance Committee has clear terms of reference and receives regular training updates
- The Audit and Risk Assurance Committee presents its annual report to Council detailing how it has conducted its business
- Suite of information governance policies in place
- Codes of Conduct and declarations of interest ensure appropriate safeguards are in place for potential conflicts of interest.
- Customer Complaints and Compliments Process in place
- Local Government Ombudsman Annual Review
- Process in place for dealing with Freedom of Information requests
- Confidential Reporting Code (whistleblowing policy) communicated to officers, Elected Members, partners and contractors
- External Auditors provide an annual report which gives a conclusion on the council's arrangements to secure economy, efficiency and effectiveness in its use of resources
- Compliance with Data Protection requirements and related guidance

Principle 7: Implementing good practices in transparency, reporting, and audit to deliver effective accountability

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice

- Writing and communicating reports for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate
- Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand
- Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way
- Ensuring Elected Members and senior management own the results reported
- Ensuring robust arrangements for assessing the extent to which the principles contained in this Framework have been applied and publishing the results on this assessment, including an action plan for improvement and evidence to demonstrate good governance (the annual governance statement)
- Ensuring that this Framework is applied to jointly managed or shared service organisations as appropriate
- Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations
- Ensuring that recommendations for corrective action made by external audit are acted upon
- Ensuring an effective internal audit service with direct access to Elected Members is in place, providing assurance with regard to

The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance

- Council's reports follow council style guide
- Website reports on actions completed and decisions taken, and provides access to the information on which decisions were made. Stakeholders are kept informed of future plans of the council and asked to become involved through the completion of consultation exercises
- Annual reports produced by the various committee's and are available on the council website
- The Statement of Accounts is available through the council website
- An Annual Governance Statement (AGS) is published with the Statement of Accounts. The AGS provides an accurate representation of the corporate governance arrangements and highlights areas where improvements are required and the action plan in place to address this which is monitored by the Audit and Risk Assurance Committee
- External Auditors provide an annual report (ISA 260- Report to Those Charged with Governance) which gives a conclusion on the council's arrangements to secure economy, efficiency and effectiveness in its use of resources
- Internal audit complies with the Public Sector Internal Audit Standards
- Annual Internal Audit Report with opinion from the Head of Internal Audit
- Assessment against CIPFA's role of the Head of Internal Audit
- Action plans resulting from review reports (internal audit, external audit, peer reviews, third party reviews), a named officer is given responsibility for completion and progress is monitored by the

governance arrangements and that recommendations are acted upon

- Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations
- Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement
- Ensuring that when working in partnership, arrangements for accountability are clear and the need for wider public accountability has been recognised and met

appropriate committee or senior officer

- The corporate risk management policy and strategy sets out the processes in place to manage risk across partnerships and the roles and responsibilities of officers and Elected Members in this respect
- Partnerships are in place where the council has arrangements to deliver services jointly or through other organisations. The effectiveness of these arrangements is assessed through partnership boards or contract monitoring
- External inspections including Ofsted, Children's Services Commissioner and external audit assess performance
- Corporate Peer Review in 2018