Code of Corporate Governance

Revised July 2021.

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 and its 10 Ambitions are at the heart of everything the council and partners in Sandwell do.

Corporate Plan: Big Plans for a Great Place

The Council has developed its Corporate Plan- The Sandwell Plan – Big Plans for a Great Place that sets out what the Council will do to deliver Vision 2030 and the 10 Ambitions over the next five years, and is based upon six strategic outcomes. The driving theme behind the Plan is One Team: One Council, which reflects the culture of the organisation through strong leadership in an honest, open and transparent environment.

This Code of Corporate Governance contributes to our Big Plans for a Great Place 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 up to ten Councillors, 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, which are aligned to each of the 10 Vision Ambitions, for which they are accountable. The council's practices are underpinned by three overarching principles:

Respect for others	Councillors 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	Councillors should uphold the law and, on all occasions, act in accordance with the trust that the public has entrusted in them.

Stewardship	Councillors 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, democratic services, health and safety, legal and assurance 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, Councillors 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 Leadership Team with the assurances it has obtained in respect of the council's governance arrangements.

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). 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 Maria Crompton   David Stevens
Deputy Leader of the Council   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	The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance
- Ensuring Councillors 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 Councillors 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.	- The council's values and behaviours (Trust, Unity and Progress) guide and shape the council's culture and helps Councillors and officers understand what is expected from them. - Upon election to office, Councillors confirm in writing that they will fulfil the expectations set out in the Code of Conduct for Elected Members. - Codes of Conduct for officers and Councillors are in place and supplemented by guidance for when serving on outside bodies including partnerships. During 2020/2021, all members have been invited to contribute to a comprehensive review of the Code of Conduct. A new Code was considered and adopted by Council in March 2021 and implemented with effect from 25th May 2021. - The ethical standards and member development committee have a development programme in place for Councillors. - 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. - Professional development planning for Councillors informs the member development programme - Register of interests for Councillors 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.

- Ensuring Councillors and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations.
- Creating the conditions to ensure that the statutory officers, other key post holders and Councillors 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.

- 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.
- 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 governance in place and process in place for dealing with Freedom of Information Act requests, Environmental Information Regulations requests and Subject Access Requests.
- Confidential reporting code (whistleblowing policy) which allows employees, partners, contractors and the public to make confidential complaints on matters of concern.
- The Ethical Standards and Member Development Committee promotes and maintains high standards of conduct and ethical governance by Councillors 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.
- Customer Complaints and Compliments Process in place.
- Arrangements for dealing with (Councillors) standards allegations under the Localism Act 2011 are in place.
- Compliance with CIPFA's "Statement on the role of the Chief Finance Officer in local government" which is reviewed on an annual basis.
- Specific roles and responsibilities of Councillors 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, GDPR 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.

Principle 2: Ensuring openness and comprehensive stakeholder engagement

CIPFA/ Solace behaviours and actions that demonstrate good governance in practice	The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance
- 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 intended outcomes.	- 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, the individual rights of citizens 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. A new Committee Management System will be introduced in September 2021 that will enhance the current provision - 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

- Ensuring that communication methods are effective, and that Councillors 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.

Members at a pre-advertised time and place so that the public and/or other Councillors of the council can attend. Decisions are only made in private if a report contains exempt information as defined 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 provide details of information that is publicly accessible.
- 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
- The council has 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, Corporate Plan and Medium Term Financial Strategy set out the council's ambitions and plans, to achieve our vision.
- Communication with officers through team briefs, staff surveys, the intranet, social media, newsletters, blogs, manager briefings and staff conferences.
- Communication with representative bodies is conducted through the service area Joint Consultative Committees and the corporate Joint Consultative Panel.
- The council is an Investors in People silver accredited organisation which confirms our commitment to supporting and developing our teams to deliver the best services for Sandwell.
- The council website hosts a database of issues where we actively engage in public consultation.
- The council consults with targeted stakeholders for specific projects using a variety of different consultation tools.

	- 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.
	- The council undertakes Equality Impact Assessments on issues that will affect our community.

Principle 3: Defining outcomes in terms of sustainable economic, social, and environmental benefits	
CIPFA/ Solace behaviours and actions that demonstrate good governance in practice	The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance
- 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	- The council's Corporate Plan sets out how the council aims to achieve its ambitious Vision 2030 to deliver positive outcomes for the people of Sandwell. The Plan is supported by the council's Medium Term Financial Strategy which ensures that resources are targeted towards achievement of the council's priorities. - The council uses its combined spending power to work towards sustainable social and economic benefits. - 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. - . - Each directorate has a business plan which sets out performance standards.

conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints.	▪ The MySandwell customer portal provides data derived from customer feedback for the use of service areas to direct improvements.
▪ 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.	▪ Value for money is assessed through External Audit, the Audit and Risk Assurance Committee reviews, service reviews and other external inspections.
▪ Ensuring fair access to services.	▪ A Strategic Risk Register identifies the key risks which may impact upon the delivery of key priorities and appropriate mitigating actions. This is regularly considered by the Audit and Risk Assurance Committee.
	▪ Decision making reports consider the sustainability of proposals as well as health, crime and financial implications.
	▪ Cabinet Workshop meetings are regularly held to set the strategic direction and identify priorities in response to available resources, identified need, statistical evidence and citizen feedback.

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	The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance
▪ 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.	▪ The council's Constitution sets out our approach to decision making and details the responsibilities for and principles of decision making within the council.
▪ 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.	▪ Decision making reports include alternative options available and details of any significant risks associated with the proposals.
▪ Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets.	▪ 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 Councillors. Reports are structured to identify options for consideration along with an analysis of outcomes, any identified risks and associated mitigating measures.

- 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 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.

- 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.) as tools for community engagement
- Communication with staff is through manager briefings, 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.
- Partnership risks are identified in relevant risk registers.
- The council has a strategic risk register and a Covid 19 and Brexit strategic risk register which identifies the key risks which may impact upon the delivery of key services and the effectiveness of the council's response to the pandemic.
- The Sandwell Vision 2030, Corporate Plan and Medium Term Financial Strategy set out the council's improvement plan,
- Detailed plans for annual budgets are prepared and presented to council for approval alongside financial plans for the medium term. Regular reports are presented to the Budget and Corporate Scrutiny Management Board where the council's performance against budget is monitored.

	- Annual reports including Scrutiny, Audit, Safeguarding, provide details of performance against service specific activities. - 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. - Community Wealth and Inclusive Economy Deal Board establish priorities and assist in informing and developing community wealth projects. - 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	The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance
- 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 Councillors and each provides a check and a balance for each other's authority. - Developing the capabilities of Councillors 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 Councillors 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 Councillors 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.	- Cabinet member portfolios aligned to 10 Ambitions. - The roles and responsibilities of the cabinet are set out in the council's Constitution, including the scheme of delegation. - Annual reports including Scrutiny, Audit, Safeguarding, provide details of performance against service specific activities. - Youth Parliament which encourages young people to engage with the council and its democratic processes. - Protocol for Elected Member/Officer Relations included within the council's constitution. - Member Development Programme Elected Member induction, training and development programme. - The council's Leadership Team has a defined role and area of responsibility and all senior officers have job descriptions which set out respective responsibilities and accountabilities. - Regular briefings between the Leader and the Chief Executive. - The council-wide process for understanding the performance and professional development needs of our employees along with a suite of policies to support employee performance toward delivering excellence. - Employee engagement survey helps understand how the council is performing against other organisations both in the public and private sector and identifies services and areas for improvement. - Induction programme for staff and ongoing appraisal, training and development. - The council-wide process for understanding the performance and professional development needs of our employees along with a suite of policies to support employee performance toward delivering excellence.

- ─ 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.

- Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources, including, Planned Leavers, Sandwell Graduate Programme and the Modern Apprentice programme. The council invests in its current and future leaders through the 'Future Engage Deliver' programme for all senior management and managers.
- Suite of clear policies and support mechanisms in place to maintain the health and wellbeing of its workforce, including access to Occupational Health, Employee Assistance and Counselling service, Wellbeing Hub, remote and flexible working.
- The Local Government Association undertook a Corporate Peer Review in 2018 with a follow up review in 2019. The council has developed an action plan to address areas for continuous improvement that were identified by the review process.
- Engagement in national and local benchmarking exercises to help identify whether the council is performing well and identify areas for improvement.

  External inspections including Ofsted and external audit assess the capability and capacity of senior officers
- Assessment against CIPFA's "Role of the Chief Financial Officer" and the "Role of the Head of Audit".

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	The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance
- 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 Councillors 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).	- The council has assessed itself against the six core principles in the CIPFA Financial Management Code and has prepared an action plan to address any areas of improvement for implementation during 2021/22. - 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 Councillors in this respect. The Audit and Risk Assurance Committee has oversight of risk management and is the council's primary body in respect of related issues. - Partnership governance arrangements are in place where the council delivers services jointly or through other organisations. The effectiveness of these arrangements is assessed through partnership boards or contract monitoring. - Regular reports to scrutiny boards, Audit and Assurance Committee and Full Council include annual Scrutiny, Audit, Safeguarding reports and quarterly monitoring reports from Children's Services Commissioner which provide details of performance against service specific activities. - 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 legislative exemptions apply) and minutes of the meeting. - The council has a scrutiny function which considers financial and corporate performance, making recommendations through to the cabinet.

- Aligning the risk management strategy and policies on internal 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.

- Decision making reports have a standard template ensuring that the financial and risk 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 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 provides assurances that the Council's governance arrangements are robust 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 met its constitutional functions.
- Suite of information governance policies are in place to manage data in compliance with the law.
- Codes of Conduct and declarations of interest ensure appropriate safeguards are in place for potential conflicts of interest.
- Customer Complaints and Compliments Process are in place and a Local Government Ombudsman Annual Review is presented to the Audit and Risk Assurance Committee.

	▪ Process in place for dealing with Freedom of Information Act requests, Environmental Information Regulations requests and Subject Access Requests. ▪ Confidential Reporting Code (whistleblowing policy) communicated to officers, Councillors, 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. ▪ An Information Governance framework to ensure compliance with Data Protection requirements and related guidance including General Data Protection Regulations.

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	The key processes and arrangements Sandwell Council has in place to demonstrate compliance with the principles of good governance
- 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 Councillors 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 Councillors is in place, providing assurance with regard to	- 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. The public is able to inspect the councils accounts and discuss them with external auditors in advance of them providing their opinion on robustness. - 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. - Service support agreement with Sandwell Children's Trust stipulates requirements of the Trust to operate within this framework. - Service Delivery Contract with the Trust sets out the respective responsibilities and accountabilities of the council and the Trust. - 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.

- 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.

- 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 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 Councillors in this respect.
- Partnership governance arrangements are in place where the council delivers services jointly or through other organisations. The effectiveness of these arrangements is assessed through partnership boards or contract monitoring.
- Annual assurances sought from the Trust through completion of an assurance statement which informs the Annual Governance Statement.
- External inspections including Ofsted, and external audit assess council performance, of which the outcomes of which are reported as appropriate to Audit and Risk Assurance Committee, Scrutiny and Cabinet.
- The Local Government Association undertook a Corporate Peer Review in 2018 with a follow up review in 2019. The Council has developed an action plan to address areas for continuous improvement that were identified by the review process.

Measures implemented to address the Coronavirus Pandemic

The key processes and arrangements Sandwell Council implemented to retain compliance with the principles of good governance whilst managing the Coronavirus pandemic

The Council initiated a framework of revised governance arrangements to address the many practical challenges of working during the Coronavirus pandemic

The Council continues to adapt the ways in which it is working to address Covid-19 in terms of its governance arrangements, safeguarding the borough's residents, supporting Sandwell businesses and assisting with the roll out of Central Government Covid related announcements, initiatives and polices.

On the advice of the officer responsible for leading the Council's response to civil contingencies or emergency situations, the Council utilised it constitutional provisions for the transfer of all Cabinet and Council functions to the Emergency committee for the initial months of the pandemic until remote decision making legislation was adopted. This ensured that decisions on live issues could be addressed appropriately and in line with established governance principles.

The Councils Financial Regulations were temporarily amended as part of Emergency delegated decision making powers to provide for necessary resources to be targeted toward immediate and emerging need. These have now reverted to pre Covid-19 arrangements. Contract Procedure Rules were similarly temporarily amended to allow for the provisioning of goods and services (for example the temporary food distribution hub)

Upon Central Government legislation for council meetings to be held remotely, the Council re-instated decision making functions to all committees from June 2020 onwards. Emergency Committee remained to progress any immediate coronavirus issues.

The nature of the pandemic required some decisions to be made at pace. The Council introduced a twice weekly meeting of its statutory officers to ensure that corporate governance mechanism were robustly maintained, including those decisions taken using urgency provisions Statutory Officers Group
- Strategic IMT

- Reset and Recovery Board (including Brexit)
- Redeployment programme
- Welfare Hub
- Temporary food hub
- Remote working arrangements for non front line staff

RIDDOR reporting of Covid 19 cases at work

The Council's approach to governance during Covid-19 has been clearly set out and shared with Councillors, the key aspects of which include:

-The Sandwell Covid-19 Local Outbreak Management Plan outlines the locally led system for Sandwell to protect and promote health and wellbeing during the pandemic. This has been further updated in April 2021 to include new challenges that have since been presented.

-Sandwell Strategic Incident Management Team (SIMT) which is responsible for the day to day Covid-19 response and linked into regional governance structures including the Strategic Coordinating Group and Public Health England. SIMT is locally accountable to the Covid-19 Community Engagement Board which was established to monitor the progress of the pandemic and any changes in national policy or guidance and to advise on how this is communicated to local communities.

-A Reset and Recovery Board was established in June 2020 with agreed Terms of Reference overseeing the emergency response (which included the establishment of a temporary food hub and welfare hub to support the most vulnerable) and the rest and recovery programme of activity.

-The Reset and Recovery programme involved new ways of working with officers working remotely and delivering services virtually where appropriate. Some front line services initially ceased or were delivered with reduced frequency. These were only restarted once a full risk assessment and reset request had been completed and signed off by the the Council's health and safety team and Public Health team and approved by the Reset and Recovery Board. The

activity of the Reset and Recovery Board has now been integrated into Leadership Team meetings as part of Business as Usual activity.

-Following the enactment of the provisions in the Coronavirus Act 2020 introduced in May 2020 on remote meetings, a full range of Council meetings has taken place using these powers and have been streamed and made available on the Council's website.

Development of a Covid-19 risk register interfacing with the Council's strategic risk register to ensure that the Council was aware of and taken account of the key Covid-19 risks. During the year this was consolidated with the Brexit risk register to form a combined Covid-19 and Brexit risk register. The register has been regularly presented to the Audit and Risk Assurance Committee during 2020/21 and at the request of the Committee has now been merged into the Council's Strategic risk register.

-The Corporate Plan is being refreshed with learning and recovery from the impacts of Covid-19 being a key theme that runs through the plan.