

DRAFT IMPLEMENTATION PLAN IN RESPONSE TO THE REPORT IN THE PUBLIC INTEREST

1. The Council has fully accepted all recommendations made by the External Auditor.
2. There are five priority recommendations from the External Auditor for the Council to address; it is accepted that these are all to be considered as high priority.

Overall Accountability for the action plan rests with the Chief Operating Officer.

<p>Recommendation One</p> <p>The Council should adopt and apply appropriate standards for business case preparation in relation to exit and pension discretions to improve information supporting decisions.</p>		
Action	Deadline	Officer Accountability
<p>1. Review of HR processes currently in place relating to the Council's use of settlement agreements in relation to its employees including:</p> <p>1.1 Commission specialist employment law advice to assist in the formulation of a fit for purpose framework and guidance for HR staff and other key staff such as legal and finance, including consideration of information security data protection compliance.</p> <p>1.2 Ensure revised business case template has appropriate sign off and that the Head of Paid Service, Monitoring Officer and S151 Officer have oversight of all exit packages.</p> <p>1.3 Consultation with Trade Unions and Internal Audit on proposed framework, guidance and sign off process.</p> <p>1.4 Approval of the revised framework will be sought from CCNC, SMU and presented to Audit & Governance.</p> <p>1.5 Review of the scheme of delegation for Officers in terms of initial authority</p>	<p>September 2021 and will remain subject to ongoing review.</p>	<p>MO/S151/HHR</p>

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<p>to enter into an agreement and approvals for the content of such documents including the overall responsibility of the Head of Paid Service in this process.</p> <p>1.6 Review of the scheme of delegation for Executive Members in terms of initial authority to enter into an agreement and approvals for the content of such documents including the overall responsibility of the Leader of the Council in this process.</p> <p>1.7 Review of the scheme of delegation as to the role of Elected Members in this process (taking into account whether the employee is a chief officer or non-chief officer)</p> <p>1.8 Inclusion of a 6 monthly review of all exit packages by internal audit.</p> <p>1.9 Annual monitoring of the use of a revised framework will be undertaken by the Audit & Governance Committee;</p> <p>1.10 Consider function and composition of Staffing Matters & Urgency Committee as part of review of Constitution (links to recommendation 3).</p>		
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Recommendation Two		
Decision notes should be maintained that document the factors that explain the case for the use of public funds under the scheme of delegation such as where payments exceed contractual entitlements.		
Action	Deadline	Officer Accountability
<p>1. Pay Elements & Discretion</p> <p style="margin-left: 20px;">1.1 A review of all pay elements upon which discretions can be applied both whilst in employment and upon exit.</p> <p style="margin-left: 20px;">1.2 For each pay element to identify the process, the controls and sign off process.</p> <p style="margin-left: 20px;">1.3 To consult with the trade unions on this process.</p> <p style="margin-left: 20px;">1.4 The above to be included in one document for sign off via CCNC.</p> <p style="margin-left: 20px;">1.5 Instructions and guidance will be issued to all Officers about the importance of record keeping.</p> <p>2. The introduction of a revised framework detailed under Recommendation One and Five will be accompanied by Officer training and development; a key part of that will be re-iterating the importance of maintaining clear records.</p> <p>3. The accompanying scheme of delegation will build in key points in time whereby reviews and decisions need to be captured by Officers.</p> <p>4. Financial decisions affecting Chief Officers will require the approval of Staffing Matters and Urgency Committee and relevant provisions will be included within the review of the Council's Constitution.</p>	<p>September 2021 and will remain subject to ongoing review.</p>	<p>S151 Officer & Head of HR</p>

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Recommendation Three		
The Council should review the design of its governance policies and procedures to manage conflicts of interest (including self-interest threats). This should include updating the Council's constitution and scheme of delegation.		
Action	Deadline	Officer Accountability
<p>1. A fundamental review of all aspects of the Council's Constitution has already commenced and a draft has been prepared by the Monitoring Officer. It is proposed that all Elected members will have the opportunity to share their views on the draft which will be shared with the Audit & Governance Committee as part of their formal role as custodians of the constitution. The Audit & Governance Committee will be invited to make recommendations to Full Council in terms of any amendments to the Constitution.</p> <p>1.1 The Monitoring Officer will undertake a six monthly review of all aspects of the constitution.</p> <p>1.2 The Audit & Governance Committee will undertake an annual review of the Constitution to ensure it remains fit for purpose and report its findings to Full Council.</p> <p>1.3 Guidance will be provided with all meeting agendas to assist Elected Members in the identification or not of a conflict of interest (this will be delivered as part of the work for Recommendation Four).</p> <p>1.4 Mandatory training will be implemented for all Officers and Elected Members to inform as to the purpose and function of the Constitution and highlight its importance in terms of assisting with the identification of conflicts of interest and structure of schemes of delegation for both Officers and Elected Members.</p>	<p>The proposed deadline provided to the Extraordinary Meeting of Council was detailed as July 2021. It is proposed that this is now revised to September 2021 due to the extent of the review to the Constitution and to allow time for sufficient consultation with all Elected Members. Any amendments to the Council's Constitution will require the approval of Full Council prior to their implementation.</p>	<p>Monitoring Officer</p>

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<p>1.5 The Council's Corporate Management Team will undertake six monthly reviews of the Officer Schemes of Delegation in place which arise from the Council's Constitution.</p> <p>1.6 Review and formalise the existing governance assurance processes between Internal Audit, the Head of Paid Service, Monitoring Officer and Section 151 Officer.</p> <p>1.7 Present a quarterly report to the Corporate Management Team to monitor the Council's Governance Framework.</p> <p>1.8 Review the terms of reference and composition of Staffing Matters & Urgency Committee (as part of the review of the constitution) as outlined in Recommendation 1 above.</p>		
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<p>Recommendation Four</p> <p>The Council should ensure all Members fully understand the requirement of the Code of Conduct in relation to declaration of interests.</p>		
Action	Deadline	Officer Accountability
<p>1. The Council will work towards the adoption of the Model Code of Conduct issued by the LGA which will replace the current Code of Conduct and procedure for the handling of complaints:</p> <p>1.1 The Joint Standards Committee will oversee the implementation of the Model Code of Conduct and make recommendations via the Audit & Governance Committee to Full Council.</p> <p>1.2 The Council will commission specialist support to assist with the development, implementation and mandatory training of all Elected Members (and key officer groups) in respect of the Model Code of Conduct, awareness raising of conflicts of interest and the declaration of interests.</p> <p>1.3 Mandatory training will be required to undertaken by all Elected Members on an annual basis.</p> <p>1.4 The Corporate Leadership Group (all Chief Officers and their direct reports) will receive mandatory training in respect of the Members Code of Conduct.</p> <p>1.5 Guidance will be provided with all meeting agendas to assist Elected Members in the identification or not of a conflict of interest.</p> <p>1.6 The Monitoring Officer, (in consultation with Head of Paid Service, s151,</p>	<p>The proposed deadline provided to the Extraordinary Meeting of Council was detailed as July 2021. It is proposed that this is now revised to September 2021 to allow time for sufficient consultation with all Elected Members. The adoption of a revised code of conduct will require the approval of Full Council and will be incorporated into the Council's Constitution.</p>	<p>Monitoring Officer</p>

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<p>Chairs and Vice Chairs of Joint Standards Committee and Audit & Governance Committee and Leaders of the Political Groups) will undertake an annual review of the Code of Conduct to ensure it is fit for purpose and the adopted Code of Conduct will be reviewed every year at Annual Council to coincide with appointments to committees and outside bodies and at any other times deemed necessary by the Monitoring Officer.</p> <p>1.7 The Council's induction programme following City Council elections (due to take place in May 2023) will be reviewed in line with progress and outcomes of this recommendation.</p> <p>Progress:</p> <p>The Joint Standards Committee is due to have its first meeting of the municipal year on 23rd June 2021. At this meeting, the Committee will commence its work on the potential adoption of the LGA Model Code of Conduct and will be supported by externally appointed specialist advisors.</p>		
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Recommendation Five		
The Council should review its policies and procedures to reflect Government guidance in the use of non-disclosure agreements.		
Action	Deadline	Officer Accountability
1. Actions taken to fulfil this recommendation will be incorporated into the work detailed at Recommendation One above.		