Babergh and Mid Suffolk District Councils

Local Code of Corporate Governance 2016/17

(Based on the new CIPFA/SOLACE Delivering Good Governance in Local Government Framework 2016)

Introduction

The main principle underpinning the development of the new Delivering Good Governance in Local Government: Framework (CIPFA/Solace 2016) ('the Framework') continues to be that local government is developing and shaping its own approach to governance, taking account of the environment in which it now operates. The Framework is intended to assist authorities individually in reviewing and accounting for their own unique approach. The overall aim is to ensure that resources are directed in accordance with agreed policy and according to priorities, that there is sound and inclusive decision making and that there is a clear accountability for the use of those resources in order to achieve desired outcomes for service users and communities.

The Framework defines the principles that should underpin the governance of each local government organisation. It provides a structure to help individual authorities with their approach to governance.

The term 'Local Code' essentially refers to the governance structure in place as there is an expectation that a formally set out local structure should exist, although in practice it may consist of a number of local codes and documents.

It is also crucial that the Framework is applied in a way that demonstrates the spirit and ethos of good governance which cannot be achieved by rules and procedures alone. Shared values that are integrated into the culture of an organisation, and are reflected in behaviour and policy, are hallmarks of good governance.

Babergh and Mid Suffolk District Councils are committed to the principles of good governance and demonstrates this commitment through development, adoption and implementation of this Local Code and will ensure that adequate arrangements are made with regard to its continued implementation, monitoring and review.
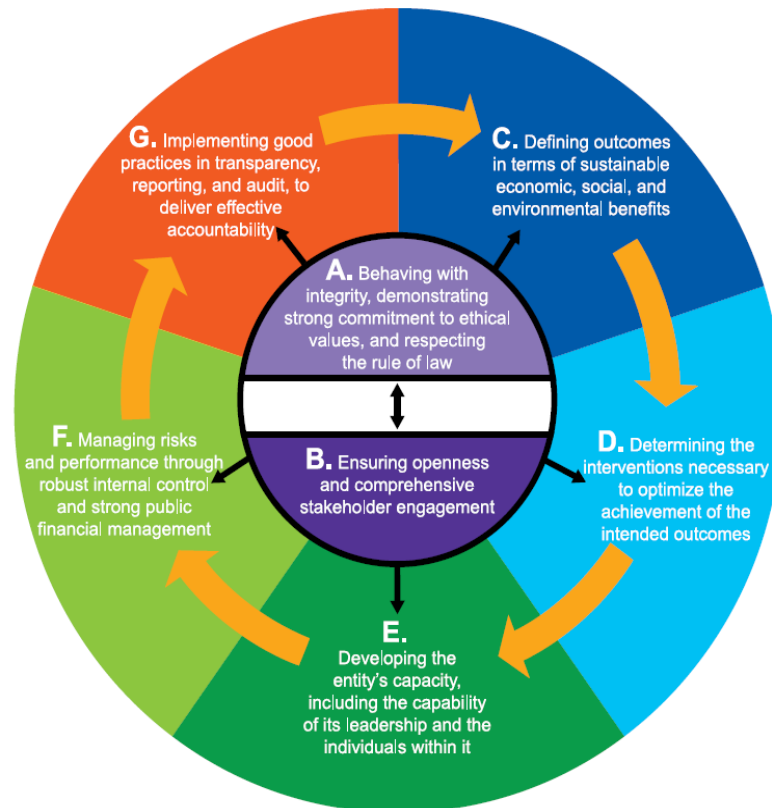
Core Principles of Good Governance

The seven principles of good governance set out in the Framework are:

A. Strong commitment to integrity, ethical values, and the rule of law.
B. Openness and comprehensive stakeholder engagement.
C. Defining outcomes in terms of sustainable economic, social and environmental benefits.
D. Determining the interventions necessary to optimise the achievement of intended outcomes.
E. Developing the capacity of the entity, including the capability of its leadership and the individuals within it.
F. Managing risks and performance through robust internal control and strong public financial management.
G. Implementing good practices in transparency and reporting to deliver effective accountability.

The diagram from the *International Framework,* below illustrates how the various principles for good governance in the public sector relate to each other. Principles A and B permeate implementation of principles C to G. The diagram also illustrates that good governance is dynamic, and that an entity as a whole should be committed to improving governance on a continuing basis through a process of evaluation and review.

Achieving the Intended Outcomes
While Acting in the Public Interest at all Times

Applying the principles of Good Governance

Each of the seven core principles above has a number of sub principles, which in turn, translate into a range of specific behaviours and actions that apply across the various aspects of the organisation that demonstrate good governance. The table below (extracted from the CIPFA/SOLACE Framework) show how each of these principles should be applied. The third column describes how the Councils' apply the principles.

Core Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law		
Sub principles	Behaviours and actions that demonstrate good governance	Demonstrated by:
Behaving with integrity	Ensuring 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.	• The Council will maintain shared values including leadership values (openness, support and respect) both for the Council and its officers. These are defined in the constitution and reflect public expectations about the conduct and behaviour of individuals. • We use shared values as a guide for decision making and as a basis for developing positive and trusting relationships within the Council. We demonstrate this by adherence to the constitution. • We have adopted formal codes of conduct defining standards of personal behaviour for Members and officers. • We maintain a Joint Audit and Standards Committee to raise awareness and take the lead
	Ensuring 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 the above 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.	in ensuring high standards of conduct are embedded within the Councils' culture.
Demonstrating strong commitment to ethical values	Seeking to establish, monitor and maintain the organisation's ethical standards and performance.	• We have put in place arrangements to ensure that Members and staff of the Councils are not influenced by prejudice, bias or conflicts of interest in dealing with different stakeholders. We have put in place appropriate processes to ensure that these arrangements are workable including declaration of interests and anti-corruption policies.
	Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation.	• We ensure that systems and processes for financial administration and control together with protection of the Councils' resources and assets, comply with ethical standards; and are subject to monitoring of their effectiveness.
	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 ethical standards expected by the organisation.	• We will ensure that professional advice on matters that have legal or financial implications is available and recorded well in advance of decision making if appropriate.
Respecting the rule of law	Ensuring members and staff demonstrate a strong commitment to the law as well as adhering to relevant laws and regulation.	• Officers will actively recognise the limits of lawful activity placed on them but also strive to utilise their powers to the full benefit of their communities.
	Creating the conditions to ensure that the statutory officers, other key post holders, and members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements.	• Officers will observe all specific legislative requirements placed upon the Councils as well as the requirements of general law, and in particular integrate the key principles of administrative law – rationality, legality and natural justice into the procedures and decision making.

	Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders.	• We have put in place effective systems to protect the rights of staff. We ensure that policies for whistle-blowing which are accessible to staff and those contracting with the Councils, and arrangements for the support of whistle-blowers, are in place. • We have established a governance group with a remit that includes reviewing assurance information across all the Councils. • We will publish an Annual Governance Statement, signed by the Chief Executive and both Leaders of each Council to confirm that we are satisfied that we have effective governance arrangements in place.
	Dealing with breaches of legal and regulatory provisions effectively.	
	Ensuring corruption and misuse of power are dealt with effectively.	
Core Principle B: Ensuring openness and comprehensive stakeholder engagement		
Sub principles	Behaviours and actions that demonstrate good governance	Demonstrated by:
Openness	Ensuring an open culture through demonstrating, documenting and communicating the organisation's commitment to openness.	• We will ensure that the Councils' vision, strategic plans, priorities and targets are developed through robust mechanisms, and in consultation with the local community and other key stakeholders, and that they are clearly articulated and disseminated. • We will maintain a culture of accountability so that Members and Officers understand to whom they are accountable and for what. • We will strive to engage with stakeholders on an individual and collective basis to demonstrate that we deliver services and outcomes that meet the needs and expectations of the public.
	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.	These arrangements will recognise that different sections of the community have different priorities and establish robust processes for dealing with these competing demands. E.g. through tenant engagement activities and our 'Open for Business' programme.
	Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/course of action.	• We will publish an annual report giving information on the Councils' vision, strategy, plans and financial statements as well as information about outcomes, achievements.
Engaging comprehensively with institutional stakeholders	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.	• We will deliver effective scrutiny of the Councils' business as appropriate and produce an annual report on the activities of scrutiny function.
	Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively.	• We will ensure that the Councils as a whole are open and accessible to the community, service users and staff and we are committed to openness and transparency in all dealings. We will attempt to publish all committee agenda items under "part 1" unless there is the need to preserve confidentiality where it is proper and appropriate to do so.
	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.	• The publication of the forthcoming decisions list will give a minimum of 28 days' notice of proposed key decisions to be made by the Cabinet or by officers under delegated authority.
Engaging with individual citizens and service users effectively	Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve communities, individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes.	

	Ensuring that communication methods are effective and that 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 in order 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 impact of decisions on future generations of tax payers and service users.	
Core Principle C: Defining outcomes in terms of sustainable economic, social, and environmental benefits		
Sub principles	Behaviours and actions that demonstrate good governance	Demonstrated by:
Defining outcomes	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.	• We will make a clear statement of the Councils' purpose and vision and use it as a basis for corporate and service planning. • We will publish an annual report on a timely basis to communicate the Councils' activities and achievements, its financial position and performance. • We will ensure that those making decisions are provided with financial and non-financial information that is fit for the purpose – relevant,

	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.	timely and gives clear explanations of technical issues and their implications.
	Delivering defined outcomes on a sustainable basis within the resources that will be available.	• We will identify and monitor service performance indicators which demonstrate how the quality of service for users is to be measured. This will include a phased introduction of an effective data collection system for all priority services. This is against a backdrop of developing a new performance management framework so that we are clear what success will look like and how we measure it.
	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.	
Sustainable economic, social and environmental benefits	Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decision about service provision.	• We maintain a prudential financial framework, balance commitments with available resources; and monitor income and expenditure levels to ensure this balance is achieved.
	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.	• We ensure compliance with the CIPFA codes regarding: a Prudential Framework for Capital Finance and Treasury Management; applying the principles and practices of accounting required to prepare the Statement of Accounts • We have produced a Joint Medium Term Financial Strategy (MTFS) which sets out the Councils' approach for delivering our strategic priorities and the management of our finances.
	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.	• We also place reliance on the work performed by our External Auditors to ensure we have put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources.

	Ensuring fair access to services.	• We will ensure that economic, social and environmental impacts are considered in the Specification of Requirements for suppliers, services and works and selection of suppliers. • The Senior Leadership Team and Portfolio Holders have a monitoring and quality control role.
Core Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes		
Sub principles	Behaviours and actions that demonstrate good governance	Demonstrated by:
Determining interventions	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.	• We will make a clear statement of the Councils' purpose and vision and use it as a basis for corporate and service planning. • We have risk management arrangements in place including mitigating actions to support the achievement of the Councils' intended outcomes. • We will ensure that there are effective arrangements in place to monitor service delivery. • We will put in place effective arrangements to deal with a failure in service delivery and explore options for improving service delivery and outcomes for our residents. • We have prepared contingency arrangements including a disaster recovery plan, business continuity plan and arrangements for delivering services during an emergency. • We will provide senior managers and Members with timely financial and performance information.
	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.	
Planning interventions	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.	• Our performance framework is developing in order to provide a strong evidence base for organisational improvement and transformation, better decision making and the efficient use of our resources.
	Considering and monitoring risks facing each partner when working collaboratively, including shared risks.	• We ensure that budget calculations are robust and reserves are adequate as defined in the policy and budget framework.
	Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances.	• We have produced a Joint Medium Term Financial Strategy (MTFS) which sets out the Councils' approach for delivering our strategic priorities and the management of our finances.
	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.	• The Councils' budget and policy framework is contained within the respective Constitution.
	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.	
Optimising achievement of intended outcomes	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 decision 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.	
Core Principle E: Developing the entity's capacity, including the capacity of its leadership and the individuals within it.		
Sub principles	Behaviours and actions that demonstrate good governance	Demonstrated by:
Developing the entity's capacity	Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness.	• Through the constitution we have set out a clear statement of the respective roles and responsibilities of the Councils' Cabinet Committee and the Members individually.
	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.	• We have set out a clear statement of the respective roles and responsibilities of the Councils' other committees and senior officers.
	Recognising the benefits of partnerships and collaborative working where added value can be achieved.	• We are developing protocols to ensure effective communication between Council Members and officers in their respective roles.
		• We have developed protocols to ensure that the Leader and Chief Executive negotiate their respective roles early in their relationship and

	Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources.	that a shared understanding of roles and objectives is maintained.
Developing the capability of the entity's leadership and other individuals	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.	• We have set out the terms and conditions for remuneration of Members and officers and publish an Annual Pay policy statement in accordance with the requirements of the Localism Act 2011.
	Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body.	• We have determined a scheme of delegated and reserved powers within the constitution and ensure that the scheme is monitored and updated when required.
	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 members and each provides a check and a balance for each other's authority.	• We will ensure that effective management arrangements are in place at the top of the organisation. • The Chief Executive is responsible and accountable to the Council for all aspects of operational management. • The Chief Financial Officer, who is also the Councils' Section 151 Officer, is the Assistant Director Corporate Resources and is a member of the Councils' Senior Leadership Team (SLT), with access to the Chief Executive and other members of the leadership team.
	Developing the capabilities of 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 risk by:- - Ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and	• The Section 151 Officer is responsible to the Councils for ensuring that appropriate advice is given on all financial matters, for keeping proper financial records and accounts, and for maintaining an effective system of internal financial control. • We have appointed a professionally qualified and experienced Assistant Director Corporate

organisational requirements is available and encouraged. - Ensuring members and offices 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.	Resources, who will lead the promotion and delivery of good financial management, safeguarding public money and ensuring appropriate, economic, efficient and effective use of funds; together with professional accountability for finance staff throughout the Councils. • The Monitoring Officer is responsible to the Councils for ensuring that the constitution is adhered to. • We will assess the skills required by Members including the understanding of financial systems. We will agree a personal development plan to develop skills and address any training gaps, to enable roles to be carried out effectively.
Ensuring that there are structures in place to encourage public participation.	• We will assess the skills required by officers through the appraisal process and address any training gaps, to enable roles to be carried out effectively.
Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections.	• We will develop skills on a continuing basis to improve performance, including the ability to scrutinise and challenge and to recognise when outside expert advice is needed.
Holding staff to account through regular performance reviews which take account of training or development needs.	• We will ensure that the statutory officers have the skills, resources and support necessary to perform effectively in their roles and that these roles are properly understood throughout the Councils.
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.	• We provide the Assistant Director Corporate Resources with the resources, expertise and systems necessary to perform the role effectively within the Councils.

		• We provide an induction programme for Councillors and officers as well as training and development through the OD Plan.
Core Principle F: Managing risks and performance through robust internal control and strong public financial management		
Sub principles	Behaviours and actions that demonstrate good governance	Demonstrated by:
Managing risk	Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making.	• We will maintain an effective Joint Audit and Standards Committee which is independent of the executive and scrutiny functions.
	Implementing robust and integrated risk management arrangements and ensuring that they are working effectively.	• We will enable the Assistant Director Corporate Resources to bring influence to bear on all material decisions and provide advice on the levels of reserves and balances to be retained.
	Ensuring that responsibilities for managing individual risks are clearly allocated.	• We will ensure that risk management is embedded into the culture of the Council, with Members and managers at all levels recognising that risk management is part of their job.
Managing performance	Monitoring service delivery effectively including planning, specification, execution and independent post implementation review.	• We will ensure our arrangements for financial and internal control and management of risk are formally addressed within the annual governance reports.
	Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks in inherent in the organisation's financial, social and environmental position and outlook.	• We will ensure effective internal control arrangements exist for sound financial management systems and processes.
	Encouraging effective and constructive challenge and debate on policies and objectives to support balanced and effective decision making.	• Our outcome performance framework looks to measure the impact the Councils (and partners) are having on improving community conditions and quality of life. This includes measuring the desired results and outcomes of our key projects, activities and services that deliver the agreed

	Providing members and senior management with regular reports on service delivery plans on progress towards outcome achievement.	priorities and ambitions of the Councils. • Councillors can monitor achievement of important impacts and outcomes through half-yearly reporting with self-service of traditional output measures.
	Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements).	
Core Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability.		
Sub principles	Behaviours and actions that demonstrate good governance	Demonstrated by:
Implementing good practice in transparency	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.	• We largely comply with the local government transparency code and publish all required information in a timely manner. • We have established a Medium Term Financial Strategy for business and financial planning process in order to deliver - a financial strategy ensuring sustainable finances, a robust annual budget process ensuring financial balance and an adequate monitoring process; all of which are subject to regular review. This is supported by a detailed budget book. • We have put in place effective transparent and accessible arrangements for dealing with complaints. • We will maintain an effective scrutiny function which encourages constructive challenge and enhances the Councils' performance overall. • We will maintain an effective Joint Audit and Standards Committee which is independent of the Executive, Strategy and Scrutiny committees.
	Striking a balance between providing the right amounts of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand.	
Implementing good practice in reporting	Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way.	
	Ensuring members and senior management own the results reported.	
	Ensuring robust arrangements for assessing the extent to which the principles contained in the 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).	• We will ensure an effective internal audit function is resourced and maintained.
	Ensuring that the Framework is applied to jointly managed or shared service organisations as appropriate.	• We will maintain open and effective mechanisms for documenting evidence for decisions and recording the criteria, rationale and considerations on which decisions are based.
	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.	• We will attempt to publish all committee agenda items under "part 1" unless there is the need to preserve confidentiality where it is proper and appropriate to do so.
Assurance and effective accountability	Ensuring that recommendations for corrective action made by external audit are acted upon.	• We will put in place arrangements for whistle-blowing to which staff and all those contracting with the Councils have access.
	Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon.	• We follow the CIPFA code of practice for the Statement of Accounts which is aiming for comparability with other authorities.
	Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations.	• We have produced a Joint Medium Term Financial Strategy (MTFS) which sets out the Councils' approach for delivering our strategic priorities and the management of our finances. This is supported by our budget and policy framework and financial procedure rules.
	Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement.	• We will produce clear, timely, complete and accurate information for budget holders and senior officers relating to the budgetary and financial performance of the Councils.
	Ensuring that when working in partnership, arrangements for accountability are clear and the need for wider public accountability has been recognised and met.	• We will maintain effective arrangements for determining the remuneration of senior staff and publish an Annual Pay Policy statement in accordance with the requirements of the Localism Act 2011.

Robust internal control	Aligning the risk management strategy and policies on internal control with achieving objectives.	• We have in place information management policies and processes.
	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.	
Managing data	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.	
Strong public financial management	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	

Annual Review and reporting

Each year the Councils will carry out a review of their Governance arrangements to ensure compliance with this Code in accordance with CIPFA/SOLACE "Delivering Good Governance in Local Government" (2016) Framework. The purpose of the review will be to provide assurance that governance arrangements are adequate, operating effectively and to identify action for improvement.

The outcome of the review is factored into the joint Annual Governance Statement prepared on behalf of the Leaders of each Council and the Chief Executive. It will be submitted to the Joint Audit and Standards Committee for their consideration and review.

A copy of this Local Code of Corporate Governance will be made available to the public on the Councils' website, as will a copy of the Annual Governance Statement.