

Independent Persons' Views/Recommendations

	Views/Recommendation	Proposed Response
1.	Both the member and employee codes of conduct reference an expectation to adhere to and uphold the standards; this is insufficiently robust and "expected" should be replaced with "required" as being a mandatory obligation on both elected councillors and appointed members of staff. What sanction do you have for someone who falls short of 'expectations'? It would be more sensible to have a range of options for sanction, should someone have derogated from required standards of behaviour or conduct.	It is open to the committee to recommend to Council (re the member code) and the Chief Executive (re the employee code) that the wording is adjusted to change "expected" to "required". However in practice each code and accompanying procedure, make clear the range of sanctions that may be applied in the event that standards fall below expected levels.
2.	Some explanation should be provided about who and what the S151 officer and Monitoring Officer are.	This has been included in the text of the statement at paragraph 13.
3.	In paragraph 1 "Governance " is defined but does not refer to "influence".	The summary definition is drawn from the adopted code of corporate governance; it is open to the committee to recommend to Council an amendment to that code.
4.	Concern expressed that appointed Independent Persons are required to complete a register of interests and make declarations of interest.	Whilst Independent Persons are neither elected members or employees of the council they nonetheless hold public office and it is therefore appropriate that they too are demonstrably upholding the principles of public life.
5.	In respect of principle F, concern expressed that is the Senior Information Risk Officer provides advice in respect of a data breach, that advice may be ignored without consequence.	If an officer fails to follow advice and guidance provided in respect of any council policy or process, the matter may be addressed appropriately through the council's employee performance management processes.
6.	The overall framework appears to be fit for purposes and demonstrates the council's desire to ensure a robust governance environment. The actions taken and those proposed appear appropriate although more timely closure could be beneficial.	No response required.
7.	Quite rightly, the document points out that not all risk can be eliminated, however, does the Cabinet/Council set any kind of Risk Appetite framework in which to operate?	The current Performance Risk and Opportunity Management (PROM) Framework does not establish any risk appetite, but does inform decision taking. The PROM is scheduled for review

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		this year and consideration will be given as to whether a risk appetite framework would be beneficial.
8.	Does the Cabinet and/or the appropriate Committees receive Key Performance Indicators aligned to the 7 principles?	There are no specific key performance indicators aligned to the seven principles within the code of corporate governance. However data related to member standards, information governance and complaints is reported annually to the Audit and Governance Committee.
9.	Have the council considered mandatory testing of staff against the code of conduct?	This will be considered within the context of the training and development programme to be implemented in the coming year.
10.	How does the council ensure that its partners adhere to standards at least as high as it own pre contract and on an ongoing basis?	The framework for partnership governance includes a focus on standards, and includes a process for annual risk assessment. It is recognised in the statement that further work is needed to ensure the process is effectively embedded.
11.	Does the council adhere to ISO standards e.g. the ISO2700 series for Information Technology?	The council's IT service is provided by Hoople who are accredited to this standard; because the statement is intended to be a high-level summary it does not document quality assurance standards at a service level.
12.	If any element of remuneration (particularly for senior managers) is performance related, is this linked to the achievement and maintenance of the codes and governance framework?	The council does not have any element of performance related pay.