



Audit and Standards Committee

Tuesday, 9th December, 2014 at 6.00pm
in Committee Room 3 at the Council House, Priory Road, Dudley

Agenda - Public Session **(Meeting open to the public and press)**

1. Apologies for absence.
2. To report the appointment of any substitute Members for this meeting of the Sub-Committee.
3. To receive any declarations of interest under the Members' Code of Conduct.
4. To confirm and sign the minutes of the meeting held on 18th September, 2014 as a correct record.
5. Grant Thornton Annual Audit Letter 2013/14 (Pages 1 – 9)
6. Annual Report of the Committee on Standards in Public Life (Pages 10 – 44)
7. Risk Management (Pages 45 – 51)
8. To consider any questions from Members to the Chair where two clear days notice has been given to the Director of Corporate Resources (Council Procedure Rule 11.8).

Under the provisions of Part I of Schedule 12A to the Local Government Act 1972, the Director of Corporate Resources has decided that there will be no advance disclosure of the following reports because the public interest in disclosing the information is outweighed by the public interest in maintaining the exemption from disclosure

The submission of these reports complies with the Local Authorities (Executive Arrangements)(Meetings and Access to Information)(England) Regulations 2012


9. Resolution to exclude the public and press

Chair to move:

“That the public and press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information under Part I of Schedule 12A to the Local Government Act 1972, as amended, for the reasons stated on the agenda.”

Agenda - Private Session
(Meeting not open to the public and press)

10. Suspensions under the provisions of the Employee Improvement and Disciplinary Procedure (Pages 52 – 57)
11. Fraud Presentation
12. Annual Audit Report in relation to the Directorate of Adult, Community and Housing Services (Pages 58 – 90)



Director of Corporate Resources

Dated: 27th November, 2014

Distribution:

Councillor J Cowell (Chair)

Councillor M Roberts (Vice-Chair)

Councillors A. Aston; C Billingham; P Brothwood; M. Evans; C Perks (Substitute), D. Russell and A. Taylor

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- The Democratic Services contact officer for this meeting is Karen Taylor, Telephone 01384 818116 or E-mail karen.taylor@dudley.gov.uk

Minutes of Audit and Standards Committee
Thursday 18th September, 2014 at 6.00 p.m.
in Committee Room 3, The Council House, Dudley

Present:-

Councillor J Cowell (Chair)
Councillor M Roberts (Vice-Chair)
Councillors A Aston, M Attwood, P Brothwood, C Perks, D Russell and A Taylor

Officers:-

I Newman (Treasurer); L Bradshaw (Head of Audit Services); N Ford (Manager of Executive Support); G Harrison (Audit Manager - Central Services); J Millar (Director of the Urban Environment); J Szczechowski (Head of Accountancy); A Taylor (Principal Auditor); A Uppal (Group Accountant) and K Taylor (Democratic Services Officer).

Also in Attendance:-

S. Joberns (Grant Thornton)

14. **Apology for Absence**

An apology for absence from the meeting was submitted on behalf of Councillor Tyler.

15. **Appointment of Substitute Member**

It was reported that Councillor C Perks had been appointed as substitute member for Councillor D Tyler for this meeting of the Committee only.

16. **Declarations of Interest**

No Member made a declaration of interest in accordance with Members' Code of Conduct in respect of any matter to be considered at this meeting.

17. **Minutes**

Resolved

That the minutes of the meeting held on 8th July, 2014, be approved as a correct record and signed.

18. **Change in Order of Business**

Pursuant to Council Procedure Rule 13(c) it was:-

Resolved

That the next item of business to be considered be Agenda Item No. 11.

19. **Exclusion of the Public**

That the public and press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information relating to any individual(s) as defined under Part I of Schedule 12A to the Local Government Act 1972.

20. **Annual Audit Report in relation to the Directorate of the Urban Environment**

A report of the Treasurer was submitted on the audit work, undertaken in the Directorate of the Urban Environment for the financial year 2013/14 and incorporating details of the more important findings as indicated in Appendix 2 and 3 to the report submitted.

Arising from consideration of the report, and Appendix to the report, submitted reference was made to the significant improvement of the number of post audit questionnaires completed and returned and the percentage of final reports issued within six weeks of the draft report.

Members asked a number of questions and made comments which were responded to, in particular, in respect of the management responses highlighted in the report.

In responding to a question raised by Members in relation to the ground maintenance undertaken at Schools and those that had transferred to Academy status, the Director of the Urban Environment undertook to provide Councillor Brothwood with data in relation to the number of Schools that received a traded service from the Directorate.

In responding to a question in relation to the Castle Hill Development, the Director of the Urban Environment undertook to update Councillor Roberts of the agreement signed by all parties in respect of the Castle Hill Development Project.

In responding to a question, the Director of the Urban Environment undertook to provide the Chair with further information in relation to the reasons why the Contaminated Land Strategy had been in draft form for four years.

Resolved

- (1) That the findings of the 2013/14 audit work be accepted.
- (2) The Director of the Urban Environment be requested to provide the following:
 - a) Councillor Brothwood with data in relation to the number of Schools that received a traded service from the Directorate.
 - b) Councillor Roberts with an update in relation to the agreement signed by all parties in respect of the Castle Hill Development Project.
 - c) Councillor Cowell with further information in relation to the reasons why the Contaminated Land Strategy had been in draft form for four years.

21.

External Audit Findings Report 2013/14

A report of the Treasurer was submitted presenting to the Committee the Council's external auditors Audit Findings Report 2013/14, together with the Letter of Representation, circulated separately to members and considered as Appendix 1 to be submitted by the Council to the external auditors.

Ms S Joberns then commented on the content of Appendix 2 in relation to the Audit Findings Report 2013/14 and in so doing reported that it was anticipated that the external auditors would provide an unqualified opinion on the financial statements and propose to give an unqualified value for money conclusion.

Supplementary information was circulated at the meeting, in relation to the unadjusted misstatements such as the review of the Paragon Schools PFI model that had been completed. A number of differences between the financial model used by the Council and the external auditor's in house model were also identified. The action plan at Appendix A to the report raised no issues regarding compliance.

Arising from the presentation given of the content of the Audit Findings Report 2013/14 a number of questions were asked to which responses were given.

Resolved

- (1) That the information contained in the report, and Appendix 2 to the report submitted on the Council's external auditors, Audit Findings Report 2013/14 be received and noted.
 - (2) That the Letter of Representation, circulated at the meeting, be approved and signed by the Treasurer and the Chair of this Committee.
-

22. **Annual Governance Statement**

A report of the Treasurer was submitted on the Annual Governance Statement to accompany the accounts for the financial year 2013/2014.

Resolved

That the information contained in the report, and Appendices to the report, submitted on the Annual Governance Statement be noted and that the Annual Governance Statement as set out at Appendix C be approved and referred to the Leader of the Council and Chief Executive for signature.

23. **Treasury Management**

A report of the Treasurer was submitted on treasury activity during the financial year 2013/14, up to August, 2014, together with the amendments to the Council's Investment Strategy, attached as Appendix 5 to the report, submitted.

Resolved

That, subject to the approval of Council:-

- (1) Treasury Management activities in 2013/14, as outlined in the report submitted be noted.
 - (2) The amendments to the Council's investment strategy, attached as Appendix 5 to the report submitted, be approved.
-

24. **Statement of Accounts 2013/14**

A report of the Treasurer was submitted presenting the Statement of Accounts to the Committee for consideration and approval and to inform them of the outcome of the audit of the accounts. The Statement of Accounts, and the audit of them, are the main formal and public reports on the financial standing of the authority. A copy of the Statement of Accounts for the year ended 31st March 2014 had been attached as Appendix 1 to the report submitted.

The Treasurer gave a visual presentation on the Statement of Accounts with particular reference to the Movement in Reserves Statement referred to in paragraphs 9-12 of the report submitted and on pages 12 and 13 of Appendix 1. It was noted that after transfers to and from earmarked reserves, the year end balance on the General Fund had increased by £5.7 million from £19.4 million to £25.1 million. This was consistent with the outturn reported to Cabinet.

Arising from the presentation given, the Treasurer responded to questions asked by the Committee in relation to the budget earmarked to schools. The Treasurer undertook to provide Councillor Roberts with further information in relation to which schools in the borough had their own banking arrangements.

Following the presentation given the Treasurer thanked his staff for their hard work in producing the Accounts.

Resolved

- (1) That the information contained in the report, and Appendix 1 to the report, on the Statement of Accounts 2013/14, be noted and that the Statement of Accounts be approved, signed and dated by the Chair of this Committee.
- (2) The Treasurer be requested to provide Councillor Roberts with further information in relation to the Schools in the Borough that had their own banking arrangements.

25. **Exclusion of the Public**

That the public and press be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information relating to any individual(s) as defined under Part I of Schedule 12A to the Local Government Act 1972.

26. **Report Required Under Standing Orders**

A report of the Treasurer was submitted on any cases arising under Standing Orders 1.9, during the period from January to July, 2014 inclusive.

Resolved

That the information contained in the report, and Appendix A to the report, submitted, be noted.

27. **Audit Services Interim Performance Report**

A report of the Treasurer was submitted on an update on Audit Services performance and other related information.

The Head of Audit Services stated that Audit Services had completed 31% of the audit plan against a target of 36%, however the time taken from the start of an audit to the issue of the draft audit reports had decreased resulting in 86% of draft reports being issued within seven weeks of the audit starting, against a performance of 97% the previous year. The performance was due to the work pressures experienced due to staff leaving.

The Head of Audit Services reported that results from the CIPFA Audit Benchmarking Club identified that Dudley continued to have lower than average costs.

It was further reported that Audit Services would be submitting a bid to the Counter Fraud Fund from The Department for Communities and Local Government to help strengthen resources to combat corporate fraud.

Arising from a discussion on the skills and knowledge questionnaire undertaken by Members of the Committee, the Treasurer and Head of Audit Services undertook to arrange training sessions on the areas raised, including a brief presentation in relation to counter fraud at the December meeting of the Committee.

Resolved

- (1) That the information contained in the report, and Appendices to the report, submitted, be noted.
- (2) The Head of Audit Services be requested to arrange a brief presentation, in relation to counter fraud, at the December meeting of the Committee.

The meeting ended at 7.45 p.m.

CHAIR

Audit and Standards Committee – 9th December 2014

Joint Report of the Chief Executive and the Treasurer

Annual Audit Letter 2013/14

Purpose of Report

1. To consider the External Auditor's Annual Audit Letter for 2013/14.

Background

2. Grant Thornton, the Council's external auditors, have produced an Annual Audit Letter. Representatives of Grant Thornton will be in attendance at this meeting to present the Letter and to discuss its contents with members.
3. The Audit Commission's Code of Audit Practice requires that the external auditors prepare an Annual Audit Letter (the Letter) and issue it to the Council. The purpose of the Letter is to communicate to the Council and its external stakeholders, including members of the public, the key issues arising from auditors' work, which the external auditor considers should be brought to the attention of the Council. The Letter is intended to cover the work carried out by the external auditors since the previous Letter was issued, in this case October 2013.
4. At the meeting of this Committee on the 18th September 2014, Grant Thornton produced their Audit Findings Report. The report considered the auditor's findings in relation to the Council's Financial Statements and Value for Money conclusion for 2013/14 and the auditor issued an unqualified opinion
5. The Letter will be presented to Cabinet on 11th February 2015 and representatives from Grant Thornton will attend and address the Cabinet on key messages, conclusions and significant issues.
6. The Letter has been published, placed on the Council website, and paper copies made available at a charge of £1.00, as agreed in 2000/01.

Finance

7. The report deals with a number of financial affairs of the Council. No additional resources are required as a direct consequence of the Letter.

Law

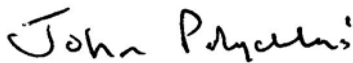
8. Legislation appertaining to Local Authority Audit and Accounts is contained in the Local Government Act 1972, part 2 of the Audit Commission Act, 1998, and regulations made there under.

Equality Impact

9. The proposals take into account the Council's Policy on Equality and Diversity.

Recommendation

10. It is recommended that the Committee:-
- Note the views of the Auditor.
 - Comment on matters in the Annual Audit Letter.



.....
John Polychronakis
Chief Executive



.....
Iain Newman
Treasurer

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List of Background Papers
Annual Audit Letter 2013/14

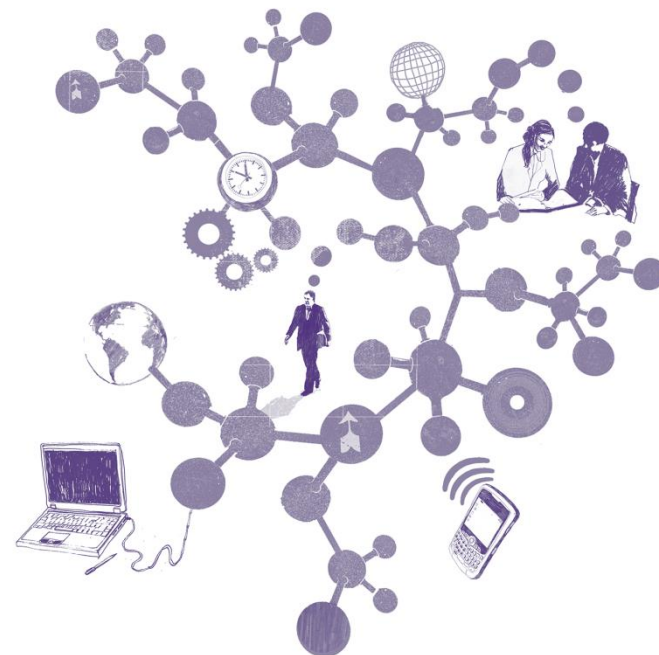
The Annual Audit Letter for Dudley Metropolitan Borough Council

Year ended 31 March 2014

October 2014

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Key messages

Our Annual Audit Letter summarises the key findings arising from the work that we have carried out at Dudley Metropolitan Borough Council ('the Council') for the year ended 31 March 2014.

The Letter is intended to communicate key messages to the Council and external stakeholders, including members of the public. Our annual work programme, which includes nationally prescribed and locally determined work, has been undertaken in accordance with the Audit Plan that we issued in April 2014 and was conducted in accordance with the Audit Commission's Code of Audit Practice, International Standards on Auditing (UK and Ireland) and other guidance issued by the Audit Commission.

Financial statements audit (including audit opinion)	<p>We issued an unqualified opinion on the Council's 2013/14 financial statements on 29 September 2014, ahead of the deadline set by the Department for Communities and Local Government. Our opinion confirmed that the financial statements give a true and fair view of the Council's financial position and of the income and expenditure recorded by the Council.</p> <p>We reported our findings arising from the audit of the financial statements in our Audit Findings Report on 18 September 2014 to the Audit and Standards Committee. The key messages reported were:</p> <ul style="list-style-type: none">• The standard of the draft accounts and supporting working papers provided by the Council were good• We did not identify any adjustments affecting the Council's reported financial position. However we made a number of adjustments to improve the presentation of the financial statements• We were satisfied that the overall approach taken by the Council to assessing provisions in respect of National Domestic Rates (NDR) is reasonable. We received confirmation in the Letter of Representation (LoR) to support the Council's view that it is not possible to arrive at a reliable estimate to the value of potential appeals not yet lodged. <p>The key recommendations arising from our financial statements audit are detailed in Appendix A.</p>
Value for Money (VfM) conclusion	<p>We issued an unqualified VfM conclusion for 2013/14 on 29 September 2014.</p> <p>We reported our findings arising from the work in our Audit Findings Report, his included a red, amber and green (RAG) rating against a number of themes. We are pleased to report that the majority of these have been rated as green. One area, Strategic financial planning, was rated Amber, signifying that a residual risk exists. This reflects the magnitude of the financial challenge that the Council is facing as it strives to continue making cost savings in an environment of significant reductions in local government funding.</p>

Key messages

Whole of Government Accounts	We reviewed the consolidation pack which the Council prepared to support the production of Whole of Government Accounts. We reported that the Council's pack was consistent with the audited financial statements.
Certification of grant claims and returns	We have certified the Pooling of Housing Capital Receipts grant claim, which were certified without amendment. Our certification work on the Council's Housing Benefit Subsidy claim is currently underway. We expect to certify this claim by the Department of Work and Pension's deadline of 30 November.
Audit fee	Our fee for 2013/14 was £179,657, excluding VAT but including an additional £1,470 in relation to extra work required on business rate balances which was not included in our original fee letter and audit plan. Further detail is included within appendix B.

Appendix A: Key issues and recommendations

This appendix summarised the significant recommendations identified during the 2013/14 audit.

Rec No.	Recommendation	Priority	Management response	Implementation date and responsibility
1	The Council should ensure that all journals contain an appropriate description.	Deficiency	Agreed. All Accountancy staff will be reminded about the importance of appropriate descriptions.	With immediate effect. Head of Accountancy.
2	The Council should review all land and building assets contained within its asset register to ensure it has the rights (e.g. title deeds) to those assets.	Deficiency	Agreed. All assets in the register will be reviewed to check that the Council has rights to the assets.	March 2015. Head of Property Services
3	The Council should take account of recent claim and settlements patterns when considering the estimate process for the 2014/15 provision.	Deficiency	Agreed. The review will take into account recent claim and settlement patterns when considering the estimate for the 2014/15 unequal pay provision.	March 2015 Head of Accountancy
4	The Council should consider a de minimus policy for smaller transactions at year end.	Deficiency	Agreed. This will be considered as part of our Closedown plan for the 2014/15 accounts.	Autumn 2014 Group Accountant Corporate Finance.
5	The Council should ensure that all capitalised staff costs are supported by timesheets.	Deficiency	Agreed. Supporting documents will be provided for the 2014/15 accounts.	March 2015 Housing Finance Manager
6	The Council should ensure it periodically reviews its accumulated absence accounts to ensure the assumptions remain up-to-date and valid.	Deficiency	Agreed. This will be considered as part of our Closedown plan for the 2014/15 accounts.	Autumn 2014 Group Accountant Corporate Finance.
7	The Council should review its approach to the revaluation of land and buildings in 2014/15.	Deficiency	Agreed. We will review our approach to valuation for 2014-15 accounts against the Accounting Code of Practice.	March 2015. Head of Property Services

Appendix B: Reports issued and fees

We confirm below the fee charged for the audit and confirm there were no fees for the provision of non audit services.

Fees

	Per Audit plan £	Actual fees £
Audit Fee*1	178,177	179,657
Grant certification fee*2	32,500	21,227
Total fees	210,677	200,884

1) There is an additional fee of £1,470 in respect of work on material business rates balances. This additional work was necessary as auditors are no longer required to carry out work to certify NDR3 claims. The additional fee is 50% of the average fee previously charged for NDR3 certifications for Metropolitan District Councils and is subject to agreement by the Audit Commission

2) New scale fee set by the Audit Commission. Revised to reflect there is no longer a requirement to certify Teachers Pensions, NDR 3 and the council tax element of the HB and Council Tax Grant.

Fees for other services

Service	Fees £
None	Nil

Reports issued

Report	Date issued
Audit Plan	April 2014
Audit Findings Report	September 2014
Annual Audit Letter	October 2014



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Audit and Standards Committee - 9th December, 2014

Report of the Monitoring Officer

Annual Report of the Committee on Standards in Public Life 2013/14

Purpose of Report

1. To consider the annual report of the Committee on Standards in Public Life 2013/14.

Background

2. A copy of the Annual Report is attached at Appendix 1. The Committee on Standards in Public Life is chaired by Lord Bew.
3. The remit of the Committee is wide-ranging but broadly it covers standards of conduct of all holders of public office whether elected or appointed.
4. The work of the Committee over the past year has focussed on an overview of activities and a standards check, commencing at pages 6 and 14 of the report respectively. Of particular interest, as part of the overview of activities, are the overviews in respect of Ethical Standards for providers of public services, a matter recently considered by this committee in respect of a Suppliers Code of Practice, and ethics in practice. The standards check looked at the behaviour and conduct of the police, Local Government standards, involving the operation of the new Members Code of Conduct regime and the electoral system.

Finance

5. There are no particular financial implications arising from this report.

Law


6. Section III of the Local Government Act 1972 enables the Council to do anything that is calculated to facilitate or is conducive or incidental to the discharge of any of its statutory functions.

Equality Impact

7. There are no equality impact implications arising from this report.

Recommendation

- 8 It is recommended that the Committee note the Annual Report of the Committee on Standards in Public Life as set out in Appendix1.



.....
Philip Tart
Monitoring Officer

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List of Background Papers
None.

Annual Report 2013-14

Committee on Standards
In Public Life

September 2014

THE SEVEN PRINCIPLES OF PUBLIC LIFE

The Seven Principles of Public Life apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the civil service, local government, the police, courts and probation services, NDPBs, and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public resources. The Principles also have application to all those in other sectors delivering public services.

SELFLESSNESS

Holders of public office should act solely in terms of the public interest.

INTEGRITY

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

OBJECTIVITY

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

ACCOUNTABILITY

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

OPENNESS

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

HONESTY

Holders of public office should be truthful.

LEADERSHIP

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

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FOREWORD

Since Lord Nolan set down the seven principles of public life - honesty, integrity, objectivity, accountability, openness, honesty and leadership - almost twenty years ago what we mean by public life in this country has changed significantly.

As we finalise this report, the full implication of the 'no' vote in the Scottish referendum is beginning to dawn on the United Kingdom. A momentous shift in democratic accountability is irrefutable; with new local structures, further devolution and a reallocation of power across our country widely expected.

In recent years the country has also adapted to widespread changes in the delivery of public services – including new third party providers of front line services, Clinical Commissioning Groups, Academies and Free Schools and Elected Mayors and Police and Crime Commissioners.

In the face of these changes, our research shows that public support for the seven principles endures. These principles are not merely theoretical concepts, they have practical consequences for ordinary people in receipt of public services. The public must feel reassured that for example safeguarding or educating children, caring for the elderly, or security arrangements at our prisons, are carried out in line with these expected behaviours.

The Committee for Standards in Public Life is at the centre of the storm over values which currently convulses British public life. Today, issues around the accountability of policing and local government are centre stage. Yesterday, it was the ethical standards of Members of Parliament: of particular relevance was the issue of lobbying. Before that, it was the scandals which surfaced concerning the performance of private companies who are in receipt of vast sums of public money. The Committee is determined to promote high standards in British public life. This requires facing up to the implications of such troubling controversies. I believe that the work we have carried out this year, detailed in this report, is an important contribution to the debate.

The Nolan principles were revolutionary at the time because they focused on behaviour and culture, rather than processes. High ethical standards need to be embedded and internalised in the culture of organisations. This applies equally to all providers of services to the public - whether they are in the private, public or voluntary sector. It is therefore important that all those involved in public service from MPs to front line local services remain alert to the fundamental role that high ethical standards play in the healthy functioning of society. Nearly twenty years on from the introduction of the seven principles of public life, they remain as relevant as ever in building public trust in our changing democracy.

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Finally, over the course of this year, the term of membership of two long-standing members of the Committee, Dame Denise Platt and Sir Derek Morris ended. Their departure will be a great loss for the Committee and I thank them for the enormous contribution they have made and the dedication with which which they carried out their role.

A handwritten signature in blue ink that reads "Paul Bew". The signature is written in a cursive, flowing style.

Paul Bew
Chair

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INTRODUCTION

1. The Committee on Standards in Public Life has wide terms of reference.

“To examine current concerns about standards of conduct of all holders of public office, including arrangements relating to financial and commercial activities, and make recommendations as to any changes in present arrangements which might be required to ensure the highest standards of propriety in public life and to review issues in relation to the funding of political parties, and to make recommendations as to any changes in present arrangements.”¹

2. The Committee fulfils this role partly through its formal inquiries and reviews. In addition, we routinely monitor and consider issues and concerns relating to standards in public life, track public perception of standards of conduct by public office holders and seek to promote the Seven Principles of Public Life. We contribute to public policy development through meetings, seminars, speaking engagements, and by responding to consultation papers on relevant issues.
3. This report provides an overview of the Committee’s activities over the course of the past financial year and beyond until July 2014. We also published Annual Plans for the years April 2013 -14 and April 2014 -15. Next year we will combine the Annual Report and Annual Plan into one document which will be published in July 2015.
4. In line with our post-Triennial Review ways of working we have carried out this year some shorter pieces of work. The first part of the year was spent conducting a review of transparency around lobbying. In the second half of the year we completed two short projects. The first considered ethical standards for providers of public services and the second ethics in induction and training. It is important that as part of its work the Committee researches public perception on standards issues and in September 2013 the Committee published its fifth general survey of public attitudes to standards in public life. We followed this up with research to compare UK public perceptions with those recorded in a number of other European countries which formed the basis of a public seminar in March 2014.
5. The appendices to the report provide detail about the structure and finances of the Committee.

¹ Hansard (HC) 25 October 1994, col. 758 and Hansard (HC) 12 November 1997, col. 899

OVERVIEW OF ACTIVITIES

Strengthening Transparency around Lobbying

6. The Committee published its Lobbying report in November 2013. We applied the Nolan principles to lobbying and considered how best the lobbied and lobbyists could live out those principles. In doing so we recognised that lobbying is a legitimate and potentially beneficial activity and necessary for effective policy formulation, and that free and open access to government is essential. But, lobbying must be carried out transparently and ethically.
7. We concluded that a package of measures was urgently required to deliver a greater culture of openness and transparency around lobbying; provide greater clarity for public office holders on the standards expected of them; and to reassure the public that a more ethical approach to lobbying is actively being applied by all those individuals and organisations involved in lobbying.
8. Recommendations included:
 - more timely and detailed disclosure about all significant meetings and hospitality involving external attempts to influence a public policy decision;
 - disclosure arrangements widened to cover special advisers and senior civil servants as well as Ministers, Permanent Secretaries and Departmental Boards;
 - public office holders who are outside the scope of the Freedom of Information Act (including Members of Parliament, Peers and Councillors) should be encouraged to disclose the same information and consideration should be given to including this in relevant Codes of Conduct;
 - extending the lobbying rules to former Members of the House for two years in respect of approaches to Ministers, other Members or public officials; and require former Members to register for two years any occupation or employment which involves them or their employer in contact with Ministers, other Members or public officials;
 - consideration to be given to Chairs of Select Committee having additional restrictions in relation to conflicts of interests and explicit provision that Members should not accept any but the most insignificant or incidental gift, benefit or hospitality or payments from professional lobbyists.
9. We welcome the steps taken by the House of Lords to address the recommendations in our report. The House of Lords Privileges and Conduct Committee proposed amendments to the Code of Conduct

and the Guide to the Code in March 2014² and May 2014³ which were subsequently approved by the House of Lords. These amendments included incorporating the revised descriptors of the Seven Principles of Public Life into the House of Lords Code of Conduct, introducing a statement of principle on how to deal with lobbyists, lowering the threshold for registering gifts, benefits and hospitality to Members from third parties from £500 to £140 and introducing a new Code of Conduct for Members' Staff with requirements to register interests in parliamentary lobbying and abstain from lobbying or using access to Parliament to further outside interests in return for a payment or other reward.

10. The House of Commons Committee on Standards consulted in January 2014⁴ on interests of committee chairs, in response in part to one of our recommendations that invited consideration of whether chairmanship of a Select Committee brings with a particular influence on matters of public policy that justifies the imposition of additional restrictions in relation to conflicts of interest. Both the Speaker of the House of Commons⁵ and the Parliamentary Commissioner of Standards⁶ have raised similar questions. Despite the consultation concluding in March, no report from the Committee has been forthcoming. This is disappointing particularly given that the House of Commons has not yet found time to debate proposals put forward by the previous Parliamentary Commissioner for Standards and the Committee on Standards for changes to the current rules, which this Committee supported and which addressed some of the recommendations of the Group of States against Corruption (GRECO), in relation to lobbying.
11. Many of the recommendations in our report were for Government and related to transparency of information about lobbying activities and arrangements for the movement of office holders between the public and private sectors which raises the risk of potential conflicts of interest. During our review the Government introduced the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Bill which proposed a register of consultant lobbyists. We considered that the narrow definition of "consultant lobbyists" would significantly limit the Bill's potential to enhance transparency around lobbying. We note that the Members of Parliament of all parties, like the respondents to our review, were severely critical of the Bill's detail. The Political and Constitutional Reform Committee pre-legislative scrutiny report of the Government's proposals for a statutory

² Committee for Privileges and Conduct Thirteenth Report Amendments to the Code of Conduct and Guide to the Code of Conduct HL 182

³ Committee for Privileges and Conduct Fifteenth Report Further Amendments to the Code of Conduct and Guide to the Code of Conduct HL 181

⁴ <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmstandards/997/99702.htm>

⁵ Letter from Mr Speaker to the Chair of the Committee on Standards on select committee Chairs and commercial interests dated 12 June 2013, www.parliament.uk

⁶ Committee on Standards, Fifth Report of Session 2013-14, Mr Tim Yeo, HC 849, Appendix 1, para 58

register of lobbyists considered that regardless of any such register, changes could be made to improve transparency about who is lobbying whom, through enhanced disclosure of Ministerial meeting.

12. In the course of the parliamentary debate, in response to such criticism, Lord Wallace of Tankerness made a government commitment to make further improvements to the accessibility of government transparency information. This included ensuring:

“greater co-ordination of the publication of data sets so that all returns within a quarter can be found on one page.....we ought to get better at the speediness with which we make this information available.....

We will also ensure greater consistency in the content of departmental reporting, particularly on including the subject of meetings. Finally, we will ensure that the gov.uk transparency pages contain a link to the statutory register of lobbyists so that the data can be easily cross-referenced. The practical implications of those improvements are that: rather than having to visit a number of different sites or pages, all information will be accessed via one easily located page of gov.uk; the consistency of those data will be improved so that the transparency reports can be more easily located via search functions; and the subject of the meetings will be set out more helpfully.”⁷

13. This commitment addresses some of the criticisms by this Committee in our report around accessibility of transparency information but does not go as far as our recommendation 5⁸ which we considered would provide sufficient transparency and accountability to enable effective public scrutiny of lobbying. We also note that the Government is committed to publishing transparency data quarterly, or at any time in the following quarter. Notwithstanding this all of the data published in 2013 was published late. The Government therefore has some way to go to meet its commitment to Parliament.

14. The Government has also recently revised the Business Appointment Rules⁹ which apply to Former Ministers and Crown servants namely civil servants (including special advisers) and members of the Diplomatic Service, Intelligence Agencies and Armed Forces before they accept any new appointment or employment after leaving their role. We welcome the greater clarity in the rules around the definition of lobbying and the practical application of a lobbying ban but note that the rules have

⁷ <http://www.publications.parliament.uk/pa/ld201314/ldhansrd/text/140113-0001.htm>

⁸ *Strengthening Transparency Around Lobbying* November 2013 p29

⁹ Business Appointment Rules: Government Response to the Committee’s Third Report of Session 2012-13 HC 563 17 July 2014

reverted to the pre-2010 position whereby only applications from the most senior special advisors are referred to the Advisory Committee on Business Appointments (“ACOBA”). Whilst this Committee has argued for a risk based approach to application of the rules, we do not think seniority is necessarily the only risk factor and the nature of the role of special advisor as a conduit of access to the Minister, in our view necessitates the referral of all applications to ACOBA.

15. The Committee also notes that the revised rules will require Departments to publish information in broad terms about the advice they give to applicants in the senior civil servants whose applications are not dealt with by ACOBA. This Committee called for the publication of consistent summary information by Departments on all cases they consider. It is the Cabinet Office’s responsibility to provide assurance of Department’s compliance with the Rules and we will maintain an interest in Departmental performance and transparency in this respect.
16. We are disappointed that given the increased use of interchange through secondments, loans and career breaks to move in and out of the public sector organisations, the Government has not accepted our recommendation for Departments and their Agencies, for transparency and public confidence reasons, to publish on an annual basis the number of secondments and interchanges in and out of their organisation.¹⁰

Public Perceptions Survey

17. In September 2013 the Committee published the fifth and latest survey of public attitudes towards conduct in public life,¹¹ a series which started in 2004. It is a unique long term, independent study and source of information about what the public think about standards in public life in the UK. The research focussed on three main issues:
 - To establish what the public sees as acceptable and unacceptable behaviour on the part of holders of public office;
 - To assess how far the public believes that the behaviour of holders of public office is, for the most part, acceptable or unacceptable;
 - To assess how far the public believes that holders of public office are effectively held responsible and accountable for their conduct.

18. Over the lifetime of the survey, there has been a continuous and substantial decline in the percentage

¹⁰ *Strengthening Transparency Around Lobbying* November 2013 recommendation 11 p 36

¹¹ <https://www.gov.uk/government/publications/public-attitudes-survey-2012>

of respondents rating standards as “quite high” or “very high”, while the percentage of respondents rating standards as “quite poor” or “very poor” has steadily increased, showing a clear trend across this data. But this trend masks a deeper pattern that shows that in fact, prior to 2010 confidence was rising, and that it suffered a major decline in 2010 after the MPs’ expenses scandal, from which there is only marginal recovery in 2012.

19. In relation to Westminster MPs, the public share broadly a set of expectations that are in line with the seven principles of public life. However they have consistently low levels of confidence that MPs actually meet these standards. In the latest survey, pessimism was less marked than in 2010, but levels of confidence have not returned to their 2008 levels. Although absolute levels of confidence are low in particular types of national public office holders or professions such as Ministers, MPs and tabloid journalists, this should be contrasted with higher and rising confidence in institutions and in processes and in those administering the process – so for example, as in most countries that have low and falling levels of confidence in politicians, there is, paradoxically, a higher confidence in national institutions such as Parliament and much higher confidence in the legal system.
20. In addition, responses to new questions in the 2012 survey indicate people’s widespread belief that they will receive fair treatment from a range of front line public services. A large majority of respondents thought they would be treated fairly by doctors, police officers, judges, and local planning bodies. Responses suggested that members of the public have more confidence in the probity of relatively junior front line staff - in terms of putting the public interest first, owning up to making mistakes, and being held accountable for mistakes - than in that of more senior managers. They also expressed more confidence in the probity of public sector employees than in those in the semi-public or private sectors.
21. Our most recent survey explored, amongst other things, which measures for ensuring good standards of conduct in public life elicit the most public support. The questions were informed by a common distinction drawn between ‘compliance-based’ and ‘integrity-based’ behaviour: that is, between good behaviour resulting from a well-designed and systematically enforced external set of rules, and good behaviour that is internally driven and the result of strong ethical character. Respondents were asked to choose up to three policies they thought important in ensuring probity in large public and private organisations.
22. Findings suggest that members of the public favour adopting elements from **both** the compliance and integrity models in ensuring public probity. They do not endorse internal self-regulation or a culture of financial incentives for those doing a job (26% for large public sector organisations and 22% for private sector). They do favour senior managers setting a good example, (38% for large public sector

organisations and 51% for private sector) and training people in a code of conduct (63% for large public sector organisations and 60% for private sector), but they also want protection for 'whistleblowing' and external regulators for organisations (whether public or private sector). Encouraging a culture where people are not afraid to report wrongdoing (66% for large public sector organisations and 53% for private sector) was seen as particularly important for promoting probity.

23. The responses of different groups of respondents - as distinguished by trust in public office holders, perceptions of standards, party-political preferences, social grade, ethnicity, age and gender - were compared to see if there were any clear differences found in how various segments of the public think that probity should be promoted. In fact, none of these comparisons yielded significant differences.
24. There is therefore very wide agreement in all segments of the British general public about the ways in which probity in both the public and the private sector can be promoted. In that shared view, the ways seen as most important are the promotion of a culture in which people are not afraid to report wrongdoing, the use of codes of proper conduct in which office holders and staff are trained, and the setting of a good example by senior managers or office holders.
25. The evidence from this long term study suggests that public attitudes are broadly stable, that they respond to events and their reporting, and that they can become more negative or more positive. This suggests that the public's perceptions of standards in public life can be repaired as well as damaged. The data also gave us a picture of groups who are most likely to feel most sceptical. This was particularly the case for those from lower social grades, from white-British or white-Irish background, middle aged or older and who have little engagement with the political system. The growth in the size of this group presents a challenge to all those involved in public life.
26. The Committee recognises it is important to place these findings in a wider context and so commissioned some further research on assessing the results from our British survey compared with other European countries, to see if results are potentially motivated by domestic factors or reflect citizen's attitudes across western democracies. This research was published in March 2014¹² and it shows that the UK public's decline in perceptions of standards in public life is part of a broader trend across Western democracies. The research also finds that British citizens' assessments of standards in public life are not unusual and they are rarely the most cynical. In fact British citizens' perceptions and experiences of corruption are lower than those in most other European countries.
27. Both sets of research however illustrate as a reminder to public authorities and office holders that public perceptions of standards in public life have political consequences. Events and the response to

¹²<https://www.gov.uk/government/publications/public-perceptions-of-standards-in-public-life-in-the-uk-and-europe>

them they play a part in informing citizens' views of standards, probity and trust.

28. Whilst this research was the final biennial survey of its type, the Committee continues to believe it is important to test public perceptions of standards issues and will continue to undertake such research, as appropriate, in its ongoing work.

Ethical Standards for providers of public services

29. The Committee's terms of reference were clarified last year so that its remit to examine standards of conduct of all holders of public office encompassed all those involved in the delivery of public services. As public services are increasingly being delivered by those outside the public sector, the Committee decided to test the expectation and assurance of ethical standards in the public service market. The Committee commissioned new independent research with members of the public, commissioners and providers of public services. We also spoke to individuals and organisations with current experience of commissioning and providing public services to understand their expectations of the ethical principles and standards expected of public services. The Committee's report *Ethical standards for providers of public services* and accompanying research was published in June 2014.

30. On the basis of our research, we can be confident that:

- the public want common ethical standards across all provider types regardless of sector, supported by a code of conduct;
- "how" the service is delivered is as important to the public as "what" is delivered;
- public and stakeholder views of what should constitute ethical standards are broadly in line with the Seven Principles of Public Life;
- commissioners expect providers to conform to ethical standards but rarely explicitly articulate this;
- commissioners want guidance on how to embed ethical standards in the commissioning and procurement process.

31. For the Committee this is an issue of accountability. The public needs to be reassured that the standards it expects are being delivered by providers, Government must be capable of assuring the public that ethical standards are part of service delivery standards and business (as the CBI has recently acknowledged) needs to recognise that a cultural shift is required in its approach to the public service market, in order to meet the public's legitimate expectations and to build public trust.

32. It was evident from our research that there are currently no consistent structures or arrangements in place to promote actively an ethical culture and behaviours in the public service market. The

Committee therefore recommended that ethical standards need to be proportionately addressed within existing contractual and monitoring arrangements, as part of the process for securing the regularity and propriety of public services.

33. The Government believes that the Seven Principles of Public Life, the basis of the ethical standards framework for those operating in the public sector, has application to all those delivering public services whether they are public sector providers or third-party providers from the private or voluntary sector. As a consequence, using the evidence base from the review and building on existing mechanisms, we set out in the report a high level framework required to support these ethical standards and provide the necessary assurance.
34. We have received considerable interest in our report and its recommendations from business organisations, commissioners and providers and we intend to follow this up with further discussions with a view to developing practical measures to help ensure high ethical standards are met.

Ethics in Practice

35. In July 2014, the Committee published *Ethics in Practice: Promoting Ethical Conduct in Public Life*, a short report which looked at the role of induction processes in embedding ethical standards in public life. The project looked at works in terms of building an ethical culture through induction, education and training, captured examples of best practice, and identified areas where more needs to be done or where previous progress may be at risk.
36. After looking across a range of public, private and voluntary sector organisations, we concluded that induction is key to ensuring that all public office holders are aware of the standards expected of them. Ethical standards need to be included in the induction arrangements for all those public life. For many of those in public life, this message has already been heard and understood. For some, however, more clearly needs to be done to embed ethical standards. The Committee was particularly concerned at the low level of engagement with ethical standards evidenced by those in Parliament.
37. Our report called for more of an obvious demonstration of leadership in relationship to ethical standards from those in the Westminster Parliament, both elected and appointed. We called for MPs, parties and the House Authorities to develop a meaningful and credible induction and professional development programme that builds an awareness and understanding of ethical standards – both principles and rules - that meets the needs of MPs and Lords and the expectations of the public.

STANDARDS CHECK

Behaviour and conduct of the police

38. The police standards have been the focus of much public concern over the last year. Both new and ongoing revelations about the conduct of individual officers and the culture and behaviours in police forces and the Police Federation have damaged public confidence and trust in the police. The role of Police and Crime Commissioners in holding police to account locally is relatively new and the College of Policing is still establishing itself as the professional standards body. We welcome the College's focus on promoting ethics, values and standards of integrity.
39. Over the last 12 months his Committee has been monitoring the ethical risks in policing and has:
- Met with the Association of Police and Crime Commissioners to discuss how best to pre-empt any ethical risks in their role
 - Responded to the Home Affairs Select Committee call for evidence on Police and Crime Commissioners
 - Responded to the Public Administration Select Committee inquiry on the validity of crime statistics
 - Responded to the College of Policing consultation on their draft code of ethics and meeting with the College to discuss the draft code, its implementation and the embedding of high ethical standards
 - Attended and spoken at conferences on policing ethics.
40. The Committee made clear its intention to monitor the extent to which Police and Crime Commissioners are genuinely open and accountable and how successful any ethical risks arising from their role are addressed in its response to the Home Affairs Committee call for evidence. This report concluded that it was too early to determine whether the introduction of Police and Crime Commissioners had been a success.
41. The Public Administration Select Committee concluded in its report on police recorded crime statistics that *"the quality of leadership within the police, and its compliance with the core values of policing, including accountability, honesty and integrity, will determine whether the quality of police recorded crime data can be restored."* PASC recommended that this Committee *"conducts a wide ranging*

inquiry into the police's compliance with the new Code of Ethics; in particular the role of leadership in promoting and sustaining these values in the face of all the other pressures on the force."

42. The Committee have considered seriously this recommendation. The Committee are likely to focus over the coming year on the accountability mechanisms for holding the police to account generally and specifically the role of Police and Crime Commissioners in representing the public in holding Chief Constables to account, and on the issues where we have heard the most concern namely the extent of their public remit and their role as ethical leaders. This will compliment and not duplicate the considerable work already underway by Her Majesty's Inspectorate of Constabulary to review anti-corruption capability in police forces and the inspection of police integrity and the College of Policing Review of police leadership.

Local government standards

43. The Committee has continued this year to maintain a watching brief of the standards regimes in local government and the changes resulting from The Localism Act 2011 implemented in 2012. Having emphasised at the time the need for a mandatory code of conduct, strong local leadership, and effective independent persons and expressed concern at the lack of sanctions, the Committee also recognised the need to allow new arrangements to bed down.
44. The survey carried out by Local Government Lawyer on the implementation of the Localism Act 2011,¹³ suggests indications are that the role of the independent person has been generally well received and there is some evidence that the number of vexatious complaints is falling. However, the effectiveness of the sanctions regime for non-adherence to Local Authority codes of conduct, which apart from criminal prosecution, provides only for censure or suspension from a particular committee or committees, remains an issue of concern. We are aware that there have been recent individual cases that illustrate this, in particular the lack of a sanction to suspend councillors who have seriously breached the code of conduct.
45. In contrast to the recent public debate on parliamentary standards calling for greater sanctions, tightening of codes of conduct, and a greater independent element, local government is now largely self regulated with no systematic approach to conduct issues and limited sanctions. There remains in our view a significant risk under these arrangements that inappropriate conduct by Local Authority

¹³ <http://www.localgovernmentlawyer.co.uk/images/stories/Localism%20Act%20Special%20Report.pdf>

members will not be dealt with effectively, eroding public confidence and trust in local government. We call upon the Local Government Association to support strong long leadership and continue to use its peer challenge process to offer sector led improvement in this area¹⁴ as we believe the LGA has a major responsibility to provide the leadership and peer support across the sector to ensure that all councils and councillors live up to the public's expectations of high standards of ethical behaviour in those whom they elect.

46. As part of the research for the Committee's *Ethics in Practice* report, we conducted a snapshot survey of Local Authorities' approach to induction and training. The Committee sent an electronic questionnaire to Local Authority Monitoring Officers in England, asking them to circulate it further to elected members. We received over 130 responses from Monitoring Officers and elected members.
47. The Committee was extremely pleased to learn that 90% of those who responded to the survey stated that their Local Authority provided an induction programme for newly elected councillors. Coverage and awareness of the Seven Principles of Public Life in local government was also pleasingly high, with 68% of respondents saying their induction covered the Seven Principles of Public Life, 88% saying it covered their Code of Conduct and 83% of respondents saying that councillors at their Local Authority were familiar or fairly familiar with the Seven Principles of Public Life.
48. Despite these positive results, however, the Committee remains alert to the challenges to ethical standards arising from financial constraints and changes to the Local Authority standards regime. The Committee will therefore continue to monitor provision of Local Authority induction programmes and the profile of standards, conduct and ethical behaviour within those programmes by repeating this survey in 2015.
49. More generally, we have provided evidence to the Communities and Local Government Select Committee inquiry on local government procurement, highlighting our belief that public sector procurement processes should take account of ethical issues as part of delivering value for money in the broadest sense. Our report *Ethical standards of third party providers of public services* considered the ethical principles and standards that the public and commissioners of services have of those delivering public services and the necessary safeguards to ensure those principles and standards are met, is directly relevant to local government who spends over a quarter of its annual expenditure on procuring goods and services from third party providers.

¹⁴ See Thanet District Council Corporate Peer Challenge 28 April 2014 at thanet.gov.uk

Electoral system

50. In light of the forthcoming elections this year and next, the introduction of the individual electoral registration and recent changes arising from the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, and other developments in the electoral sphere, the Committee met with Chair of the Electoral Commission this year to discuss the level of ethical risk to the electoral system.
51. The forthcoming election brings into focus two particular matters on which the Committee has made recommendations in the past. Firstly, electoral registration. The Committee key made recommendations about electoral registration in its Eleventh report – *Review of the Electoral Commission* (2007) - including the introduction of arrangements for individual registration to modernise the system and to help tackle electoral fraud. The Committee therefore welcomes the introduction this year of individual electoral registration (IER). The Committee also notes the Electoral Commission recent report on *Electoral Fraud in the UK* which recommended that more could be done to tackle electoral fraud and that “polling station voting in Great Britain remains vulnerable to impersonation fraud because there are currently few checks available to prevent someone claiming to be an elector and voting in their name,’. Given recent allegations of electoral irregularities in local elections, the Committee will keep a watching brief on electoral fraud and the implementation of IER.
52. Secondly, reform of party funding. The Committee published its report on Party Funding in 2011. It made 24 recommendations to be accepted as a complete package. Key recommendations included:
- a donation cap of £10,000 for all donations from any individual or organisation to any political party in any year;
 - the cap to apply to all individuals and organisations, including trade unions;
 - limits on campaign funding in the period before an election to be cut by 15%;
 - an increase in existing state funding to parties calculated on the basis of the number of votes received in the previous election or elections at £3 per vote received in a Westminster election and £1.50 in an election to a devolved legislature;
 - the additional state funding we recommended after 2015 would amount to approximately £23m per year. Broken down that is 50p per voter.
53. Following the breakdown of cross-party talks on reforming party finance, the Government confirmed in October 2013 it would not be taking forward any of the Committee’s recommendations this

Parliament.

54. It is clear to the Committee that party funding is still an issue of concern for the public. They want to be sure that people and organisations are not buying influence through the funding of political parties. Dependency on a big donor culture creates a suspicion that donations can be used to exert influence on the parties. That suspicion is, in turn, corroding to trust in politics generally.
55. The Committee's package of recommendations was designed to restore integrity and provide meaningful accountability, providing a radical change to create a sustainable party funding system. The Committee made clear that any move to implement some parts, whilst rejecting others would upset the overall balance the recommendations were trying to achieve. Real progress will require all main parties to look beyond their own political advantage to arrive at a solution that has cross-party agreement and will restore public confidence in the integrity of the funding system.

REPRESENTATIONS AND SPEECHES

56. Over the course of the year, the Chair has spoken at a number of events on standards issues, promoting the work of the Committee and the importance of the Seven Principles of Public Life and providing other examples of best practice, including:
- In November 2013 Lord Bew gave the opening address at the Annual Governance Conference of Lawyers in Local Government; a presentation about the work of the Committee to the Public Service Commissioners of various Commonwealth countries; and a speech at the OECD 'Restoring Trust in Government' policy forum in Paris
 - In January 2014 Lord Bew gave a speech entitled 'Effective Parliamentary Standards' at the Annual Conference of the Study of Parliament Group, at Worcester College, Oxford
 - In May 2014 Lord Bew gave evidence to the Northern Ireland Assembly's Committee on Standards and Privileges in relation to their review of the Assembly's Code of Conduct and Guide to the Rules Relating to the Conduct of Members
 - In June 2014 Lord Bew gave a speech at the launch of the Hansard Society's Audit of Political Engagement and also gave evidence to the House of Commons Committee on Standards Sub-Committee in relation to their inquiry on the standards system in the House of Commons.
57. In March 2014 the Committee held a seminar on issues around trust in public life. The event was open

to the public and the video of the event can be found on our website (<https://www.gov.uk/government/organisations/the-committee-on-standards-in-public-life>)

58. Other Committee and Secretariat Members also spoke about the work of the Committee and standards issues in a number of contexts, including:

- a presentation, in September 2013 to a group of students on MA Corruption and Governance course at University of Sussex
- a presentation, in November 2013, to a group of visiting Canadian politics students
- attending the 40th Forum of Asia Pacific Privacy Authorities in New South Wales in December 2013 to discuss ethical issues for privacy authorities
- a speech at The Policing of Ethics: Towards an Ethical Police Service conference in July 2014

59. The Committee has also been proactive in promoting the Seven Principles of Public Life through responses to a number of consultations including:

- the draft cross party Bill on democratic political activity (funding and expenditure) in April 2013
- the Whistleblowing Commission consultation on strengthening policy and law on whistleblowing in the workplace in July 2013
- the Public Administration Select Committee's consultation on the integrity of crime statistics in November 2013
- the College of Policing's draft Code of Ethics in December 2013
- the Home Affairs Select Committee's consultation on Police and Crime Commissioners in December 2013
- the Civil Service Commission's consultation on changes to their Recruitment Principles in February 2014
- the Committee on Standards' consultation on the Interests of Committee Chairs in March 2014
- Sir Richard Lambert's Banking Standards Review in March 2014
- the Public Administration Select Committee's inquiry into Civil Service impartiality and referendums in April 2014
- the Northern Ireland Assembly's Committee on Standards and Privileges' review of their

Members' Code of Conduct in May 2014.

60. The secretariat received and responds regularly to public enquires and correspondence on standards issues. The Secretariat has had the means of monitoring the number and sources of visitors to its former corporate website (www.public-standards.gov.uk) since October 2013. Between 1 October 2013 and 26 August 2014 we received 22,745 unique visits to our corporate website, from 140 countries. Efforts to redesign our corporate website between November and early August 2014 resulted in user engagement (in the form of visitors returning to the site) more than doubling over this period. As of August 2014 the Committee's website has been moved to Gov.uk (<https://www.gov.uk/government/organisations/the-committee-on-standards-in-public-life>)

APPENDIX 1: ABOUT THE COMMITTEE

Terms of reference

61. The Committee on Standards in Public Life was established under the chairmanship of the Rt. Hon. Lord Nolan by the then Prime Minister, the Rt. Hon. John Major MP, in October 1994, with the following terms of reference:

“To examine current concerns about standards of conduct of all holders of public office, including arrangements relating to financial and commercial activities, and make recommendations as to any changes in present arrangements which might be required to ensure the highest standards of propriety in public life.”¹⁵

62. On 12 November 1997, the then Prime Minister, the Rt. Hon. Tony Blair MP, announced additional terms of reference:

“To review issues in relation to the funding of political parties and to make recommendations as to any changes in present arrangements.”¹⁶

63. On 5 February 2013, the terms of reference of the Committee were clarified in two respects:

“in future the Committee should not inquire into matters relating to the devolved legislatures and Governments except with the agreement of those bodies”

and

“The Committee’s remit to examine ‘standards of conduct of all holders of public office’ [should be understood] as encompassing all those involved in the delivery of public services, not solely those appointed or elected to public of.”¹⁷

64. The Committee’s remit does not allows us to investigate individual allegations of misconduct.

Status

65. The Committee is an independent advisory non-departmental public body (NDPB). Its members are appointed by the Prime Minister. Six of its members, including the chair, are chosen through open

¹⁵ Hansard (HC) 25 October 1994, col. 758

¹⁶ Hansard (HC) 12 November 1997, col. 899

¹⁷ Hansard (HC) 5 February 2013, col. 7WS

competition under the rules of the Office of the Commissioner for Public Appointments (OCPA). The remaining three members are nominated by the three main political parties. The Committee is not founded in statute and has no legal powers to compel witnesses to provide evidence or to enforce its recommendations. Nor does it have any powers to investigate individual allegations of misconduct. It presents its recommendations to the Prime Minister and publishes them simultaneously.

Funding and administration

66. The Committee receives its budget from the Cabinet Office. Day-to-day responsibility for financial controls and budgetary mechanisms are delegated to the secretary of the Committee. The Secretary and the rest of the secretariat are permanent civil servants employed by the Cabinet Office or on secondment from other departments or elsewhere. The current Secretary is seconded from the Ministry of Justice.

Policy on openness

67. In its first report the Committee defined the Seven Principles of Public Life. The Committee has always sought to implement these principles in its own work, including the principle of openness.

68. The Secretary of the Committee has responsibility for the operation and maintenance of the Committee's publication scheme under the Freedom of Information Act 2000. Most of the information held by the Committee is readily available, and does not require a Freedom of Information Act request before it can be accessed. The Committee can be contacted in writing, by email, by telephone or by fax. The public can also access information via the Committee's website. Requests for information under the Freedom of Information Act should be made to the Secretary to the Committee at the following address:

- **Committee on Standards in Public Life**
Room GC05
1 Horse Guards Road
London SW1A 2HQ
- Phone: 020 7271 2948
- Email: public@standards.gsi.gov.uk
- Website: <https://www.gov.uk/government/organisations/the-committee-on-standards-in-public-life>

APPENDIX 2: MEMBERS OF THE COMMITTEE

69. Until the latest appointments, Committee members were appointed for a three year term, with the possibility of reappointment. The latest three members were recruited for a five year non-renewable term. The Chair is appointed for a single non-renewable five year term.

Chair: Lord Paul Bew

Appointed: 1 September 2013 **Term ends:** 31 August 2018

Lord Bew teaches Irish History and Politics at the School of Politics, International Studies and Philosophy at Queen's University.

Lord Bew has previously:

- served on the Joint Committee on Parliamentary Privilege
- chaired the independent review of Key Stage 2 (SATs) provision in England
- served on the Joint Committee on the Defamation Bill, which addressed key issues of academic freedom
- served on the Local London Authority Bill Select Committee
- acted as historical adviser to the Bloody Sunday Inquiry

He was appointed as a non-party-political peer by the independent House of Lords Appointments Commission in February 2007, following his contributions to the Good Friday Agreement.

Members active in 2013-2014 who are currently members

Lord Alderdice

Appointed: 1 September 2010 **Reappointed:** 1 September 2013 **Term ends:** 31 August 2016

John Alderdice is a fellow of the Royal College of Psychiatrists. He led the Alliance Party and has held a variety of positions in the Federation of European Liberal, Democrat and Reform Parties and Liberal International. He was one of the negotiators of the Good Friday Agreement. Raised to the peerage on October 1996, he took his seat on the Liberal Democrat benches in the House of Lords on 5 November that year. In 1998 Lord Alderdice was elected member for Belfast East and appointed Speaker of the Northern Ireland Assembly. In 2004 he was appointed as a Commissioner for the newly established Independent Monitoring Commission. He is also the Chairman and a Director of the Centre for Democracy and Peace Building (based in Belfast) and President of ARTIS (Europe) Ltd, a research institution designed to improve the understanding of cognitive and behavioral science related to politically motivated violence through science-based field research.

Rt Hon Margaret Beckett MP

Appointed: 1 November 2010 **Reappointed:** 1 September 2013 **Term ends:** 31 August 2016

Margaret Beckett has been Labour MP for Derby South since 1983. She was Secretary of State for Trade and Industry 1997-1998, President of the Council and Leader of the House of Commons 1998-2001, Secretary of State for Environment, Food and Rural Affairs 2001-2006, for Foreign Affairs 2006-2007, Minister for Housing and Planning (attending Cabinet), Department for Communities and Local Government 2008-2009. She has also been Chair of the Intelligence and Security Committee. Margaret is a member of the Labour National Executive Committee and Chair of the Joint Committee on National Security Strategy.

David Prince CBE

Appointed: 1 June 2009 **Re-appointed:** 1 June 2012 **Term ends:** 31 May 2015

David Prince is the former Chief Executive of the Standards Board for England. He held senior positions at the Audit Commission, as Managing Director, Strategy and Resources and District Audit. Previously his career was in local government, where posts included Chief Executive of Leicestershire County Council and Director of Finance and Administration of Cambridgeshire County Council. He has held non-executive independent appointments as lay member of the General Social Care Council, Leicestershire Police Authority and the Performance and Best Value Committee of the Bar Standards Board. David is currently Chair of the Audit Committee of Parkinson's UK and, an independent member of the Audit and Corporate Governance Committee of the Care Quality Commission and a lay member of the General Pharmaceutical Council.

Patricia Moberly

Appointed: 17 May 2012 **Term ends:** 16 May 2017

Patricia Moberly was Chair of Guy's and St Thomas' NHS Foundation Trust from 1999 to 2011. During her previous career as a schoolteacher, she worked in secondary schools in London and Zambia, and was Head of the Sixth Form at Pimlico School from 1985 to 1998. She served on the National Executive of the Anti-Apartheid Movement, was a member of Area and District Health Authorities and of the General Medical Council, a local councillor and a magistrate. Currently she is a prison visitor and a member of the Ethics Committee of the Royal College of Obstetricians and Gynaecologists, and serves on an advisory committee to the Secretary of State for Transport. She is a panellist for the Judicial Appointments Commission.

Sheila Drew Smith OBE

Appointed: 17 May 2012

Term ends: 16 May 2017

Sheila Drew Smith OBE is an economist by background. She has been an independent assessor for public appointments (OCA) since 1997 and undertakes selection work in the private sector. She is the Chair of the National Approved Letting Scheme and a committee member for Safe Agents. She is also currently a member of the appointments panel of the Bar Standards Board, the Member Selection Panel of Network Rail and an independent panel member for RICS. She was was a board member of the Housing Corporation between 2002 and 2008, the Audit Commission between 2004 and 2010, and the Infrastructure Planning Commission and the Office of the Regulator of Social Housing until March 2012. She was also an independent assessor for public appointments until May 2012. Prior to this she was a partner in the predecessor firms of PricewaterhouseCoopers working in the UK and internationally. Her earlier career was in the civil service.

Dame Angela Watkinson MP

Appointed: 30 November 2012

Term ends: 30 November 2017

After an early career in banking and a family career break, Dame Angela Watkinson worked for several local authorities in special education and central services. She has served as a councillor for both the London Borough of Havering and an Essex County Council. Angela was elected as Conservative MP for Upminster in 2001 and continues to serve her enlarged constituency of Hornchurch and Upminster. She has spent most of her Parliamentary Career as a Whip, and Lord Commissioner to the Treasury. Angela is also a member of Parliamentary Assembly of the Council of Europe.

Richard Thomas CBE

Appointed: 17 May 2012

Term ends: 16 May 2017

Richard Thomas CBE LLD was the Information Commissioner from November from 2002 to 2009 and the Chairman of the Administrative Justice and Tribunals Council (AJTC) from 2009 to 2013. He is currently a Strategy Adviser to the Centre for Information Policy Leadership and has served as Deputy Chairman of the Consumers Association, as Trustee of the Whitehall and Industry Group, and as Board Member of the International Association of Privacy Professionals (IAPP). During his earlier career his roles included Director of Consumer Affairs at the Office of Fair Trading from 1986 to 1992 and Director of Public Policy at Clifford Chance, the international law firm, from 1992 to 2002.

Members active in 2013 – 2014 who have subsequently stood down

Sir Derek James Morris MA DPhil

Appointed: 1 March 2008

Re-appointed: 1 March 2011

Term ended: 28 February 2014

Sir Derek Morris has been Provost of Oriel College, Oxford since 2004. Previously he was Chairman of the Competition Commission (formerly the Monopolies and Mergers Commission). From 1970 to 1997 he was an Economics Fellow at Oriel College and from 2004 to 2005 he chaired the Morris Review of the Actuarial Profession. He is chairman of trustees of Oxford University Press Pension Fund, non-executive chairman of Lucida plc and a senior consultant to Frontier Economics.

Dame Denise Platt DBE

Appointed: 1 July 2008

Re-appointed: 1 July 2011

Term ended: 30 June 2014

Denise Platt was an Audit Commissioner and chair of the independent advisory panel for the Local Innovation Awards until October 2010. From 2004 until 2009 she was chair of the Commission for Social Care Inspection (now part of the Care Quality Commission). She has held a variety of posts both nationally and locally in local government and social care and has been an independent panel member to appoint the Electoral Commissioner. She holds posts with a number of voluntary organisations and is the chair of the National AIDS Trust (NAT). She is governor of the University of Bedfordshire and a member of the independent Review Board of the Cheshire Fire and Rescue Service and the Independent Commission on Assisted Dying.

Research Advisory Board

The Committee's work is supported by a Research Advisory Board. The current Board members are:

- **Dr Mark Philp** (Chairman), Professor, Director of the European History Research Centre, Dissertation Coordinator, Department of History, University of Warwick
- **Dr Jean Martin**, Senior Research Fellow, Social Inequality and Survey Methods, Department of Sociology, University of Oxford
- **Professor Cees van der Eijk**, Professor of Social Science Research Methods, Director of Social Sciences Methods and Data Institute, University of Nottingham
- **Dr Wendy Sykes**, Director of Independent Social Research Ltd (ISR) and Member of the SRA

implementation group on commissioning social research.

Members' attendance (1 April 2013 – 31 March 2014)

70. The table below shows the total number of meetings that each member of the Committee could have attended and the number they actually attended.

Name	Possible meetings	Actual meetings
Lord Bew	7	7
Lord Alderdice	11	7
Rt Hon Margaret Beckett MP	11	8
Patricia Moberly	11	10
Richard Thomas	11	10
Sir Derek Morris	8	7
Dame Denise Platt	11	8
David Prince	11	11
Sheila Drew Smith	11	10
Angela Watkinson MP	11	8

71. In addition to the monthly Committee meetings, all members attend a variety of other meetings and briefings in relation to the business of the Committee.

Remuneration

72. Committee members who do not already receive a salary from public funds for the days in question may claim £240 for each day they work on committee business. The Chair is paid on the basis of a non-pensionable salary of £500 per day, with the expectation that he should commit an average of 2-3 days a month, although this can increase significantly during Committee inquiries. All members are reimbursed for expenses necessarily incurred.

73. For the period April 2013 to March 2014 committee members other than the Chair claimed a total of £21,765.74 in fees and expenses.
74. In total, the Chairs (David Prince being interim Chair from 1 April to 31 July 2013) claimed £20,159.84 in fees and expenses.
75. In accordance with the best practice recommended in its first report, members of the Committee formally adopted a code of practice in March 1999. The code is available on the website and has been reviewed periodically by the Committee, most recently in July 2011. Members provide details of any interests that might impinge on the work of the Committee through the Committee's register of interests, also available on the website at:
- <https://www.gov.uk/government/publications/register-of-interests>

APPENDIX 3: FINANCIAL INFORMATION

Expenditure	2012-13 (£)	2013-14 (£)
Staff costs and fees	355,737	214,791
Other running costs	161,425	116,084
Total net expenditure	517,162	330,875

76. As an advisory Non-Departmental Public Body (NDPB), the Committee receives its delegated budget from the Cabinet Office. The Cabinet Office Accounting Officer has personal responsibility for the regularity and propriety of the Cabinet Office vote. Responsibility for certain levels of authorisation, methods of control and day to day mechanisms have been delegated to the Secretary to the Committee but creation of all new posts and the use of external resources are subject to the approval of the Cabinet Office Approvals Board. Whilst the core secretariat has been reduced to three, the Secretary can and has used the budget to buy-in additional time limited resource to service specific inquiries and reviews. This level of resource necessarily constrains the choices the Committee makes in relation to its work programme and, taken together with the time taken to secure approvals, affects its ability to respond quickly and comprehensively to standards issues as they emerge.
77. The Secretary to the Committee is responsible for setting out the outputs and outcomes which the Committee plans to deliver with the resources for which they have delegated authority, and for reporting regularly on resource usage and success in delivering those plans. She is also responsible for maintaining a sound system of internal control over the resources for which she has delegated authority, and for providing the accounting officer with assurances that those controls are effective.
78. For the year 2013-14 the Committee's budget allocation was £400,000. There was an under spend of £69,125. The main causes of this under spend were savings generated by a) a decision not to commission a planned survey into the impact of the Committee's report *"Standards Matter: A review of best practice in promoting good behaviour in public life"* and b) a planned re-design of the Committee's website during November 2013 being cancelled because a decision was made to migrate the contents of its website to gov.uk in 2014. Both of the projects on the two most recent reports also ran into the current financial year.

APPENDIX 4: REPORTS AND PUBLICATIONS

The Committee has published the following reports:

- Ethics in Practice: Promoting Ethical Standards in Public Life (July 2014)
- Ethical standards for providers of public services (June 2014)
- Strengthening transparency around lobbying (November 2013)
- Standards matter: A review of best practice in promoting good behaviour in public life (Fourteenth Report (Cm 8519)) (January 2013)
- Political Party Finance - Ending the big donor culture (Thirteenth Report (Cm 8208)) (November 2011)
- MPs' Expenses and Allowances: Supporting Parliament, Safeguarding the Taxpayer (Twelfth Report (Cm7724)) (November 2009)
- Review of the Electoral Commission (Eleventh Report (Cm7006)) (January 2007)
- Getting the Balance Right: Implementing Standards of Conduct in Public Life (Tenth Report (Cm6407)) (January 2005)
- Defining the Boundaries within the Executive: Ministers, Special Advisers and the permanent Civil Service (Ninth Report (Cm 5775)) (April 2003)
- Standards of Conduct in the House of Commons (Eighth Report (Cm 5663)) (November 2002)
- The First Seven Reports - A Review of Progress - a stock-take of the action taken on each of the 308 recommendations made in the Committee's seven reports since 1994 (September 2001)
- Standards of Conduct in the House of Lords (Seventh Report (Cm 4903)) (November 2000)
- Reinforcing Standards (Sixth Report (Cm 4557)) (January 2000)
- The Funding of Political Parties in the United Kingdom (Fifth Report (Cm 4057)) (October 1998)
- Review of Standards of Conduct in Executive Non-Departmental Public Bodies (NDPBs), NHS Trusts and Local Public Spending Bodies (Fourth Report) (November 1997)¹⁸
- Standards of Conduct in Local Government in England, Scotland and Wales (Third Report (Cm

¹⁸ This report was not published as a Command Paper.

3702)) (July 1997)

- Local Public Spending Bodies (Second Report (Cm 3270)) (June 1996)
- Standards in Public Life (First Report (Cm 2850)) (May 1995)

Since 2004, the Committee has also undertaken four biennial surveys of public attitudes towards conduct in public life. Findings were published in 2004, 2006, 2008, 2011 and 2013.

Annual Report 2013-14

Published electronically by the Committee on Standards in Public Life

The Committee on Standards in Public Life

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September 2014

Audit and Standards Committee - 9th December 2014

Report of the Treasurer

Risk Management

Purpose of Report

1. To update members on current Corporate Risks and other matters relating to risk management.
2. To provide information relating to particular corporate risks as previously selected by this Committee.

Background

3. This Committee requested it should receive details of Corporate Risks three times per annum. This is the second such report for the current municipal year.

Corporate Risks

4. Appendix 1 shows details of Corporate Risks as reviewed by Corporate Board on the 4th November 2014 and therefore those appearing at the highest level on the Council's risk register. At this time, Board added a new Corporate Risk relating to the risks inherent in the Better Care Fund. This is seen as a vital part of Board's role in overseeing risk management and identifying the most appropriate and effective means of mitigating risks. In simple terms, these risks are generally acknowledged as being the most significant facing the Council, impacting upon at least one or several of Council's key objectives.
5. Corporate Board also receives reports on Corporate Risks at least 3 times per annum and in addition, all Directors continue to review Directorate risks on a quarterly basis which form part of the Quarterly Corporate Performance Report.
6. In addition to risks tabled in Appendix 1, it is acknowledged that this Committee may identify any additional risks that it considers should form part of the Corporate Risks list.

7. At its last meeting on 8th July 2014, this Committee agreed to scrutinise risk ORG0013. This risk relates to Information Governance and will be discussed in more detail by the Treasurer.

Finance

8. There are no explicit financial implications arising from this report.

Law

9. The Council has a statutory responsibility for managing risks as laid out in Section 4 of the Accounts and Audit Regulations 2003 (amended 2006).

Equality Impact

10. Risk ORG0021 relates to services to children and young people.

Recommendations

11. That this committee:
- Notes and comments on the Corporate Risks as set out in Appendix 1.
 - Identifies any additional risks that it considers should form part of the Corporate Risks list.
 - Considers specifically Risk ORG0013 relating to Information Governance.
 - Identifies a particular risk for closer scrutiny the next time a risk report is scheduled (Provisionally February 2015).






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Iain Newman, Treasurer



Contact Officer: Sara McNally, 01384 815346. sara.mcnally@dudley.gov.uk


Corporate Risks as reviewed and amended by Corporate Board 4th November 2014

Risk Ref	The Risk	Risk Rating	Risk Owner	Mitigating Controls and owners	Status since last report May 2014
ORG0001	Implications of Equal Pay settlements.	Moderate	Philip Tart	Specialist legal advice and support in relation to equal Pay litigation. Philip Tart	
ORG0002	The Council may be unable to set and/or manage its budget so as to meet its statutory obligations within the resources available.	Major	Iain Newman	<p>Financial monitoring meetings with budget holders and directorate management teams. Jan Szczechowski</p> <p>Financial intelligence networking, e.g.: Monitoring and forecasting of government grants, announcements and briefings from Department of Communities and Local Government, Local Government Association, Special Interest Group of Municipal Authorities and other relevant commentators. Jan Szczechowski</p> <p>Monitoring and forecasting of council tax and the local share of business rates (in conjunction with Accountancy and the Valuation Office Agency). Ian Wollaston</p> <p>Reporting to Cabinet and Audit and Standards Committee on spending and income and at outturn (including the Statement of Accounts). Iain Newman</p> <p>Budget and business planning processes agreed with Informal Cabinet and Corporate Board. Processes will consider budget pressures and develop savings proposals, including efficiency, transformation, alternative service delivery models and service prioritisation. Iain Newman</p>	

ORG0002	Continued			<p>Reports to Cabinet, Scrutiny Committees and Council on budget proposals. Iain Newman</p> <p>Reports to Council on the robustness and the adequacy of financial reserves (Section 25 of the Local Government Act 2003). Iain Newman</p> <p>Corporate Board to operate as a programme board for the delivery of actions to address the budget challenge. John Polychronakis</p> <p>Monitoring of the ring-fenced Public Health grant and health outcome trends to ensure evidence of high return on investment (recognising that the Council's allocation of this grant is above target). Karen Jackson</p> <p>Transformation of social care and work with health partners to ensure delivery of the Better Care Fund and the requirements of the Care Bill (recognising their significance in the Medium Term Financial Strategy). Andrea Pope-Smith</p>	
ORG0003	Energy & Carbon reduction targets not achieved resulting in increased energy costs, increased carbon emissions and financial penalties under the Environment Agency CRC Scheme.	Significant	Phillip Tart	<p>All reporting obligations met in accordance with requirements of the Carbon Reduction Commitment Scheme. Christopher Jenkins Energy Manager</p> <p>Creation & mtce of a new Corporate Energy and Carbon Reduction Strategy. Christopher Jenkins Energy Manager</p> <p>Ongoing programme of energy and carbon reduction activities, planned, coordinated and delivered. Christopher Jenkins Energy Manager</p> <p>Head of centralised property function (proposed) to have responsibilities in relation to energy management T.B.A.</p>	

ORG0007	Corporate Property Review There is a risk that the Council fails to vacate sites in a timely manner and is unable to release sites to the LLP for disposal in accordance with the development agreement, resulting in detrimental financial consequences.	Moderate	Phillip Tart	Detail project/partnership underway incorporating Corporate Property and the LLP. Steve Cooper	
ORG0013	Information Governance: The Council may fail to; assess the importance of information to the business and may be unaware of the potential impact on the organisation should the confidentiality, integrity or availability of information be compromised.	Major	Iain Newman	<p>An Information Governance Board headed by the Senior Information Risk Officer (SIRO) with an Information Risk Officer (IRO) for each directorate to oversee development of and compliance with information governance policies. Iain Newman</p> <p>An Information Governance Unit to maintain and advise on policies, coordinate responses to Freedom of Information requests and Data Protection breaches and perform other duties to support the Information Governance Board. Lewis Bourne</p> <p>Online Data Protection, Freedom of Information and Information Security training for all staff. Lewis Bourne</p> <p>Escalation of Information Governance issues to Corporate Board as required. Iain Newman</p> <p>Action Plan to ensure compliance with a Statement of Undertaking given to the Information Commissioner." John Polychronakis</p>	

ORG0017	Welfare reform/s - There is a risk that various changes to welfare and benefits could place people at risk and increase pressures on statutory services	Significant	Philip Tart	<p>Corporate Welfare Reform Project Board in place to monitor actions and outcome. Diane Channings</p> <p>Increased provision for bad debt (housing) subject to regular review. Diane Channings</p> <p>Reviewing use of Discretionary Housing Payments in line with new guidance. Mike N Williams</p> <p>Local Welfare Assistance/Members Steering Group in place a replacement scheme for DWP Social Fund. Mike N Williams</p> <p>Joint working with third sector and other external internal partners to identify and support people affected by changes. Mike N Williams</p> <p>Increase & diversify housing stock to mitigate effects of spare room subsidy Ron Sims</p>	
ORG0019	The Council acknowledges that there is a risk of fraud across all areas of its operations and is working both internally and with external partners to prevent and reduce this risk.	Significant	Iain Newman	<p>Detailed fraud risk register is held within Audit Services which is reviewed on a quarterly basis. Les Bradshaw</p> <p>Data matching exercises undertaken. Les Bradshaw</p> <p>Audit Services has detailed work programme where areas of fraud on the fraud risk register are reviewed with relevant staff / departments to examine controls in place to prevent and detect fraud. Les Bradshaw</p> <p>Fraud strategy action plan in place, monitored by Divisional Management Teams on a quarterly basis. Les Bradshaw</p>	

ORG0021	It is becoming increasingly difficult for the Council to mitigate against the risks to children and young people who are vulnerable to harm due to a rising demand and contracting budgets.	Major	Ian McGuff	<p>Protecting critical services for the most vulnerable and developing our early help offer. Ian McGuff</p> <p>Working with partners to increased their contribution early help and critical services. Ian McGuff</p> <p>Working directly with families to improve the quality of parenting in the borough. Ian McGuff</p>	
	If the Council (and its partners) fail to deliver the improved outcomes required by the Better Care Fund, the demand on acute services will not be reduced and consequently the performance related funding will not be received	Significant	Andrea Pope-Smith	<p>Clear performance framework for each team as a sub set of <i>Better Care Fund</i> measure. Owner TBC</p> <p>Active role of rapid response service. Owner TBC</p> <p>Management of public expectations, provision of alternatives to institutional care and improved operational effectiveness of preventative services. Owner TBC</p> <p>Contract management process in relation to planned levels of activity and waiting time performance. Owner TBC</p>	New Risk

Risk rating is a combination of impact and likelihood

Status reflects risk history since last report (July 2014 in this instance)

Status key:  **Worsening**  **Stable**  **Improving**