

INTERNAL CONTROL AND GOVERNANCE SELF ASSESSMENT

Introduction and Guidance

Controls and Governance Assurance statements from the officers directly accountable to Cabinet are a key element of the recommended process to assess and report on the Peterborough's internal control and governance arrangements.

The following questions have been designed to prompt those officers to consider the existence, adequacy and effectiveness of their and therefore the Council's internal control and governance arrangements. This self assessment questionnaire will ensure there is a formal and annual review of internal control and governance to meet the requirements to prepare and publish a statutory Annual Governance Statement (AGS).

In order for each Directorate to provide a full and broad commentary it is recommended that this is discussed and agreed at Departmental Management Teams. The self assessment questionnaire has been developed to prompt consideration of how well various aspects of the internal control and governance framework are working.

To assist in the assessment, examples of controls / arrangements have been provided which could be used to demonstrate that the control is in place – this is not an exhaustive list and there may be other examples. The evidence signposted must be tangible and capable of being provided as it may be subject to audit review as part of the AGS process. It is important to remember that there is no need to produce a portfolio of evidence. This self assessment should be a review of the systems, processes and arrangements already operating and in place. A key to the assessment is shown below.

At the end of the self assessment, you are asked to detail any control or governance weaknesses that you have identified and record them on the action plan.

Based on the responses to these questions, Executive Directors should be able to complete the control and governance assurance statement for their Department, highlighting any areas requiring improvement.

Assessment Key			
Score	Assessment	Findings / Conclusion	Action Required
1	Disagree strongly	Significant gaps / weaknesses exist or controls non-effective (generally non-compliant)	Actions are identified to secure improvements, improved effectiveness and compliance / improved compliance
2	Disagree slightly	Some gaps / weaknesses exist or controls only partly effective (partial compliant)	Actions are identified to secure improvements, better effectiveness and full compliance and evidence is signposted in support of areas of compliance
3	Agree slightly	Some minor gaps / weaknesses exist but generally strengths outweigh weaknesses and controls are generally effective (generally compliant)	Evidence is signposted in support of areas of compliance and effectiveness and actions are identified to secure improvements in effectiveness and full compliance
4	Agree strongly	Very few or no gaps / weaknesses exist and controls are effective (fully compliant)	Evidence is signposted in support of areas of excellent effectiveness and full compliance

GOVERNANCE ASSURANCE SELF ASSESSMENT			
	Expected Control	Examples of Control	Assessment

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IC01	MANAGEMENT ARRANGEMENTS		
	<ul style="list-style-type: none"> The Council and its services are constantly changing. It is therefore important that management arrangements are reviewed on a regular basis to ensure that they are still relevant to the needs of the service and its method of delivery The Council has a service planning process in place which requires that service performance and resources are aligned to the objectives of the Council The Council has in place a service of Scrutiny Committees that aim to examine policy for and performance of service delivery. 		
1.01	The Council can demonstrate that roles and responsibilities of senior management are clearly defined	Job descriptions in place and reviewed as part of the PDR process	
		Structure chart in place	
		Clear line of delegation	
1.02	The Council can demonstrate that there is a clearly defined reporting structure within the service	Structure chart in place	
		Management Team terms of reference / agenda / minutes	
1.03	The Council can demonstrate that its structures and methods of working are reviewed to ensure that it is demonstrating value for money	Inclusion in service planning process	
1.04	The Council can demonstrate that it has objectives in place to aligned to the Councils vision	Included in service planning process	
1.05	The Council can demonstrate that it reviews its management structures and processes as and when vacancies arise	Notes of service planning meetings and requirements for recruitment exercises	
1.06	The Council can demonstrate that the appraisals of managerial staff include relevant management competencies	PDR process in place for ALL managerial staff	

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IC02	HEALTH AND SAFETY		
	<ul style="list-style-type: none"> Health and Safety within the Council is the responsibility of all and this is included within the overarching corporate policy. Managers are responsible for ensuring that risks are assessed, control measures identified, responsibilities for control allocated, procedures are in place and followed and that staff are adequately trained. Due to the diverse number of tasks undertaken by the Council, the impact of Health and Safety legislation on individual work practices will vary significantly, but all service areas will have some risks that require management The Council has in place a Health and Safety Team which acts as a "competent person" with officers dedicated to give technical help and support on health and safety issues. Policies are drafted and issued and best practice advice given on all new legislation affecting health and safety issues. Policies and procedures are prepared for risks that face all / most services and in Directorates for specific local risks. <p>(NB: In some areas involved with complex risks / or where staff deal with hazardous substances, processes, situations or provide services to children or vulnerable adults, Health and Safety procedures will be more prescribed)</p>		
2.01	The Council can demonstrate that it has completed regular Health and Safety reviews	Evidence of completion of Health and Safety reviews	
2.02	The Council can demonstrate that any issues raised as part of reviews / audits have been included in action plans and that any outstanding issues are being monitored	Health and Safety Action Plan	
		Evidence of management meetings where this has been addressed	

IC03	BUSINESS CONTINUITY AND EMERGENCY RESILIENCE		
	<ul style="list-style-type: none"> The Council has a corporate Business Continuity Plan Each service has their own BCP and ER Plans There is a coordinatory role to ensure compliance and standardisation across all services 		
3.01	The Council (and its services) has produced a Business Continuity Plan (in line with the corporate template issued) and all key staff have been briefed on their roles and responsibilities as detailed within the Plan	Evidence of staff training	
		Inclusion in induction training	
3.02	The Council (and its services) has produced a Resilience Plan (in line with the corporate template issued) and all key staff have been briefed on their roles and responsibilities as detailed within the Plan	Evidence of staff training	
		Inclusion in induction training	

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IC04	EQUALITY AND DIVERSITY		
	<ul style="list-style-type: none"> • The Equality Scheme outlines the Council's key equality priorities and includes action plans for embedding equality and diversity in all areas of our work • Services undertake Equality Impact Assessments and embed their outcomes within their service delivery planning process and publish the results • Services are improving their equality performance monitoring and engagement with equality target groups 		
4.01	The Council has arrangements in place to undertake Equality Impact Assessments (EIA) and embeds these within its Service Delivery Plans	A programme of EIA's outlined in SDP	
		Outcomes of EIA's published on the intranet	
		Equality and diversity actions arising from EIA processes are outlined in the SDP	
4.02	Equalities Performance Monitoring is implemented as an integral part of the performance management arrangements and used to inform service planning and delivery	Local Equality Performance Indicators are reported in the SDP	
		Equality performance monitoring data used in the EIA process	
		SDP's include actions to improve the equality performance monitoring undertaken by the Council	
4.03	The Council is working towards specific equality objectives	Equality objectives are detailed in the SDP	
		Action plan for achieving these objectives is referred to or include within the SDP	
		Equality objectives are communicated to employees and customers	
4.04	Equality learning and development needs of all employees are identified and met	PDR process includes discussion about equality objectives of the service and the equality learning and development needs of employees	
		Employees have been training in the Councils Equality and Diversity policy and objectives and diversity awareness	
4.05	The Council understands the diverse needs of its diverse customers and knows how best to meet these	Engagement activity with equality target groups	
		Outcomes of engagement are used in EIA and SDP process	
		Outcomes are fed back to customers and community groups	

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IC05	FINANCIAL MANAGEMENT		
	<ul style="list-style-type: none"> The Council has financial regulations that highlights the key controls and responsibilities of officers in relation to the management of the Councils financial performance The statutory Responsible Finance Officer (Executive Director of Strategic Resources) has overall responsibility for ensuring that there are adequate financial management controls in place 		
5.01	The Council can demonstrate that it complies with all aspects of the Council's Financial Regulations in relation to the main financial systems: <ul style="list-style-type: none"> Purchase to Pay Payroll Income / write offs / waiving of charges Banking / Cash Property / Land / Buildings Stores / Stock / Equipment Taxation 	Up to date financial procedure manuals	
		Financial training for budget holders	
		Regular reporting of financial activity at service level	
5.02	The Council can demonstrate that senior management accept responsibly for financial management	Job descriptions include financial management responsibilities	
		Roles and responsibilities clearly defined / included in procedures	
		Owner identified for all budgets allocated	
		Scheme of Delegation	
5.03	The Council can demonstrate that the budget is set to meet service objectives and complies with the Councils Financial Regulations in relation to budgetary control, staffing and resource allocation	Evidence of review and update of SDP with regards to any budget variations	
		Budget set in line with allocated resources	
		Fees and Charges set within corporate policy	
		Evidence of budget review	

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IC06	PROCUREMENT ARRANGEMENTS		
	<ul style="list-style-type: none"> Ordering and purchasing arrangements comply with current legislation, EU directives, Health and Safety Regulations and Environmental Policy. The Council has a Procurement Team which undertakes the major supply contracts for the Council, and also provides advice to managers on procurement arrangements Council procurement processes are laid down in Council Standing Orders and Corporate Procurement Strategy guidance. 		
6.01	The Council is aware of how to access the Councils Corporate Procurement Guidance (via intranet)	Staff induction includes reference to / demo of procurement and project management	
6.02	The Council can demonstrate that relevant staff are aware of the range of procurement training and development opportunities or have received appropriate on the job training	Staff training requirements are noted on PDRs	
		PDRs contain appropriate evidence of courses attended	
6.03	The Council can demonstrate that there are management processes in place to ensure that all procurement is undertaken in line with the guidance and Standing Orders and Best Value Principles: <ul style="list-style-type: none"> Appropriate documentation is retained to substantiate decisions There is a requirement within all orders and contracts for suppliers used to conform to the Councils policies 	Documentation is maintained for all tenders and quotations and there is evidence of the evaluation process being performed	
		Tendering processes are noted	
		Copies of contracts contain the Councils Terms and Conditions of contracting	
6.04	The Council can demonstrate full and mandatory use of corporate contracts where applicable	Referrals to the Procurement Team	
		Project Plans	
6.05	The Council can demonstrate a good understanding and compliance with Contract Standing Orders and EU Regulations	No breaches identified	

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IC07	RISK MANAGEMENT (INCLUDING PROJECT MANAGEMENT)		
	<ul style="list-style-type: none"> • The Council has in place an agreed Risk Management Strategy • The Council has in place a clearly defined Risk Management process • The Council has in place a senior officer group to coordinate the risk management process • Briefings have been given to staff at various levels within the Council • The Council has adopted Prince2 methodology as the framework for the implementation of all projects 		
7.01	Managers and key officers have the skills and knowledge to manage risks effectively and roles and responsibilities are clearly defined	Details of training provided / PDRs	
		Team meetings include risk management issues	
		Risks discussions at DMTs	
		Included in JD and Pspec for appropriate employees	
7.02	The Council risk register(s) identifies the significant risks to the achievement of its objectives and is accurate, complete and up to date	Link to SDP	
		Completed in accordance with the corporate risk management process	
		Register reviews are undertaken in accordance with corporate guidance and completed on time	
		New and emerging risks are considered and added to the register	
		Cross cutting / mutual risks are included	
		Partnership risks are included	
7.03	The Council has successfully implemented clear risk management structures and processes in accordance with the risk management framework	The results of risk reviews are reported to Executive Directors	
		Red risks are reported and acted upon in accordance with process	
		Good quality risk information is included in Cabinet reports in accordance with guidance	
		Linked to SDPs	
7.04	<p>The Council can demonstrate that projects (ICT and non ICT related) are managed adopting best practice project management techniques incorporating:</p> <ul style="list-style-type: none"> • Effective governance arrangements • Risk management • Benefits realisation • Change management 	Project managers are trained in Prince2 methodology	
		All projects are lodged on Verto	
		Post implementation reviews are undertaken for all projects and are available for inspection	
		Risk register maintained	
		Risk registers are subject to regular review and reporting to the Change Board	

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IC08	PERFORMANCE MANAGEMENT AND DATA QUALITY		
	<ul style="list-style-type: none"> The Council monitors performance against priorities and targets, and addresses underperformance The Council understands the needs of its decision makers and provides them with information that is fit for purpose and is used to support decision making The Council produces relevant and reliable data and works with partners to ensure the quality of partnership data 		
8.01	The Council can demonstrate an integrated and inclusive approach to managing and challenging performance at all levels within their services	Service Delivery Plan	
		SDP Action Plan up to date	
		DMT minutes / reports	
8.02	The Council can demonstrate due regard and compliance with the Councils data quality standards and arrangements	Evidence files for performance indicators reported	
8.03	Directors / Heads of Service review and challenge performance information to ensure that all data is accurate, timely and accessible to support decision making	Evidence of sign off, challenge, changes and integration within service performance management arrangements	
8.04	Data quality and the use of performance information forms an integral part of the Councils approach to performance management, using performance information and action planning to address risks and tackle areas of underperformance	Evidence of sign off, challenge, changes and integration within service performance management arrangements	
		Actions within SDPs and PDRs to demonstrate action taken re: data quality and service improvement and any resulting evidence of changes as a result	

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IC09	INFORMATION GOVERNANCE		
	<ul style="list-style-type: none"> • The Council has an ICT Strategy and Information Strategy in place • The Council has in place an Acceptable Usage Policy • The IT services and infrastructure is managed on a daily basis by SERCO as the Councils main contractor • The Council has a Data Protection procedure as well as procedures for the Freedom of Information Act 		
9.01	<u>IT Policy</u> All staff have read, understood and implemented the Computer Usage Policy (which covers both electronic and manual information governance) as it relates to their role within the Council	All new staff have received initial and refresher training on the Information Security and Computer Usage Policy	
		All new staff are provided with the policy and training as part of their induction checklist	
9.02	<u>IT Systems</u> The Council can demonstrate that access to all systems is set to allow officers to perform their duties	The level of access is reviewed at system change and officer / post changes in a manner consistent with the information within the system and this review is documented	
		The access requirements for individual employees, for all systems, is maintained by service managers	
		The procedure exists for all staff changes of role / leavers to be reported to ICT service desk to remove access rights for centrally managed systems (e.g. email, CRM, shared data drives etc,) Training and development plans are included as part of PDRs	
9.03	The service can demonstrate that information which is the responsibility of the Council but provided to other organisations is managed appropriately	The service has documented arrangements for the electronic or physical transmission of information, outside of the Councils secure facilities (networks and buildings)	
		The Council has reviewed with contractors managing information on behalf of the Council; their compliance with the data handling arrangements for Local Government	
9.04	The Council can demonstrate that arrangements are in place the security of information when it is taken out of the workplace, either on portable devices or where systems are accessed remotely via mobile or home based working or manual information	Information Risk Assessments have been completed for all systems access enabled through mobile / flexible / homeworking arrangements	
		Documented arrangements to protect information both manual and electronic when it is removed from the workplace	
		Staff who work remotely or take information out of the workplace are aware of the additional information security risks remote / mobile working entails	

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IC09	INFORMATION GOVERNANCE (continued)		
9.05	<p>The Council can demonstrate that for locally managed systems the following have been included:</p> <ul style="list-style-type: none"> - management actively review performance information and management reports to verify that the system is operating in a controlled manner; for example, exception reports, audit logs etc. - There are systems administrators in place and ownership for the systems has been accepted i.e. ownership included in job descriptions etc. - There is a defined process in place for carrying out backups and recovery arrangements are followed 	Procedures and timetables of the reports to be produced, and how these are to be checked and followed up	
		Evidence that the checking of exceptions has taken place	
		Job descriptions reflect roles	
		A procedure to identify, monitor and control who system administrators are within each service	
		Systems administrators know which systems they are required to back up and provide recovery arrangements for	
		Back up procedures are fully documented, are timetabled and maintained in a register	
		Evidence that periodic system restores have been made from back ups to test the arrangements	
		Data archiving arrangements are in place, data is reviewed annually for readability and procedures are documented	
9.06	<p><u>Data Protection and Confidentiality Relating to Personal Information</u></p> <p>The Council can demonstrate that it properly evaluates the impact of the 8 Principles of Data Protection and the Common Law Duty of Confidentiality relating to personal information on proposed new systems.</p>	Information value assessment made as part of Statement of Requirements	
		Privacy Impact Assessments made as part of Statement of Requirements	
		Clear evidenced of project documentation to mitigate risks both initial and ongoing	
9.07	The Council can demonstrate that staff understand their personal liability in relation to unlawful disclosure of personal data	A clear process for raising staff awareness in this area	
9.08	The Council can demonstrate that it meets duties under the 8 Principles of Data Protection and the Common Law Duty of Confidentiality relating to personal information	A clear monitoring and reporting system against the corporate security policy and protocols	
9.09	<p><u>Freedom of Information and the Environmental Information Regulations</u></p> <p>The Council can demonstrate that it meets duties under FOI and EIR (e.g. access to information requests within 20 days)</p>	A clear process for raising staff awareness in this area	
		A clear monitoring and reporting system for FOI and EIR requests	
9.10	The Council can demonstrate that it properly evaluates the impact of FOI and EIR on proposed new systems	Clear evidence of project documentation to mitigate risks both initial and ongoing	

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IC10	MANAGEMENT PEOPLE		
	<ul style="list-style-type: none"> The Council has a Human Resources Team that is responsible for developing Council wide processes to comply with legislation and for giving help and advice to managers on their implementation The Council has HR policies and processes accessible to all employees Guidance and advice is readily available from Human Resources to management in relation to key policies and processes with which managers need to comply 		
10.01	<u>Recruitment and Selection</u> The Council can demonstrate that it is ensuring compliance with the Council's policy and procedures for recruitment and selection	Induction checklist followed	
		Service managers regularly review the appointments process to ensure adherence to the code	
		There is always an accredited interviewer on all selection panels	
		JDs and Pspecs in place and up to date	
		Appropriate references are maintained on file	
		Health declarations are reviewed by Occupational Health and their comments are retained on file Where this is required, there is evidence that the CRB check has been completed	
		All other pre-employment checks i.e. qualifications, right to work in UK, national insurance number, identity checks etc. are recorded and maintained on the personal file	
10.02	The agreements with agency staffing companies require for individuals to be fully vetted prior to being commissioned for work	Copies of agency agreements are available	
		A neutral vendor contract to manage agency arrangements including quality compliance is in place	
10.03	<u>Employee PDRs and Training</u> The Council can demonstrate that it is ensuring compliance with the Councils PDR process	Induction checklist followed	
		There is an annual process for managers or confirm that PDRs have been taken	
		There is evidence that the Head of Service reviews a sample of PDRs to ensure consistency	
		Staff development plan is used	
		There is evidence of training undertaken	
10.04	<u>Managing and Supporting Attendance at Work</u> The Council can demonstrate that it is ensuring compliance with the Councils Attendance Policy	Trigger reports are received and acted upon	
		There is a record of staff return to work discussions on personal files	
		DMTs consider absence reports	
		The corporate process is utilised and no local systems are maintained	

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IC10	MANAGEMENT PEOPLE (continued)		
10.05	<u>Employee Conduct and Disciplinary Procedures</u> The Council can demonstrate that all its employees are aware of the existence of the Councils Code of Conduct	Code issued at staff induction	
10.06	The Council can demonstrate that it is ensuring compliance with the Councils disciplinary procedures: <ul style="list-style-type: none"> • Training and support is made available to managers involved in the process • Managers review the outcome of disciplinary procedures to ensure that there is a consistency of approach and that any corrective action needed within processes has been undertaken 	PDR records as appropriate	
		Code issued at induction	
10.07	<u>Dignity and Respect at Work</u> The Council can demonstrate that it is ensuring compliance with policy	Policy issued at induction	
		Review of employee complaints	
		Tribunal cases	

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IC11	GOVERNANCE ARRANGEMENTS, LAWS, REGULATIONS, POLICIES AND PROCEDURES		
	<ul style="list-style-type: none"> • The Council has an agreed Constitution and Code of Conduct in place that highlights the key requirements for Corporate Governance • The Councils Constitution details the extent of delegated powers and includes procedural and contract standing orders and financial regulations • The Council has adopted a Code of Corporate Governance • The Council and its individual services / Directorates are subject to external inspection regimes • The Council has a legal service who are available to give advice to managers on legal issues and who are responsible for cascading details of relevant legislation to services • The responsibilities of statutory officers such as the Monitoring Officer are clearly defined 		
11.01	The Council can demonstrate that all relevant employees of the service are aware of their responsibilities to ensure satisfactory levels of internal control are in place	Core corporate responsibilities are included within JDs of relevant managers	
11.02	The Council can demonstrate that it has in place systems and procedures to verify that employees are complying with all relevant aspects of the Councils Constitution	Inclusion within the induction process for relevant employees	
11.03	The Council can demonstrate that the Councils Monitoring Officer has been made aware of any potential relevant issues of legality	Correspondence within Legal Services	
11.04	The Council can demonstrate all relevant employees are aware of their statutory responsibilities in relation to their area of service	Detailed in JDs	
		Members of professional bodies	
		Trade publications	
		Updates from Legal Services	
11.05	<p>The Council can demonstrate that individuals are appropriately qualified to undertake the statutory duties:</p> <ul style="list-style-type: none"> • individuals are given adequate job training to allow them to fulfil their duties • advice is given to relevant employees on the Councils Constitution where this is appropriate • JDs include detailed requirements of the statutory obligations relating to the post 	There is a management process in place to check that required qualifications and competencies of staff undertaking duties. This is clearly noted in the PDR process	
		Documentation of delegated decisions	
		Detailed and current JDs	
		Where decisions relating to statutory obligations are made, a clear audit trail is in place	
11.06	There is a clear process in place to ensure that non-compliance is reported to management at the appropriate level and documented action is taken	There are adequate performance indicators and exception reports to highlight where systems are failing	
		These are reported to management on a regular basis	
		Documentation is maintained of decisions made and actions required	
		Internal Audit reports are received and recommendations implemented	
		Requirements of Financial Regulations are understood	

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IC12	ANTI FRAUD AND CORRUPTION		
	<ul style="list-style-type: none"> • The Council has an agreed Policy Statement on Fraud and Corruption and Fraud Response guidance • There are several policies in place within the Council that underpin the fraud culture of the Council. These include Code of Conduct for Employees, Whistleblowing Policy etc. • Other policies and systems and internal control mechanisms within the Council, in particular in relation to financial regulations and practices, have been designed to minimise the potential of fraud and loss 		
12.01	All employees are made aware of the Councils approach to anti-fraud and corruption	Awareness of policies and procedures: - Anti fraud and corruption policy - Whistleblowing Policy - Prosecution Policy - Bulletins circulated Staff required to undertake e-learning package	
12.02	The Council has undertaken an assessment of fraud and corruption risk within the last 12 months	Completion of Fraud and Corruption risk checklist Fraud risks included in risk register Assessment of risks presented by organisational changes Assessment of risks presented by the introduction of new systems	
12.03	The Council can demonstrate that declarations of interests, gifts and hospitality are completed by all employees in accordance with relevant guidance	Register of gifts and hospitality maintained, reviewed and reported	
IC13	PARTNERSHIP GOVERNANCE		
	<ul style="list-style-type: none"> • Partnership guidance established 		
13.01	The Council can demonstrate that the governance arrangements for all significant partnerships have been considered Significant partnerships are where: <ul style="list-style-type: none"> • It is a statutory relationship • It is critical to the provision of a service and the achievement of objectives • It provides a significant proportion of the service income • It costs a significant proportion of the service budget • It takes decisions on behalf of or which are binding to the Council 	All significant partnerships have been identified The governance arrangements have been evaluated and all significant deficiencies have been reported Annual reports on significant partnerships are presented to Cabinet	
13.02	The Council can demonstrate that the governance arrangements for all other external partners have been considered in accordance with guidance	The governance arrangements have been evaluated and all significant deficiencies have been reported	

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IC14	COMMUNICATIONS / CUSTOMER SERVICES		
	<ul style="list-style-type: none"> The Council has a corporate Communications Team who work with / support Directorates with the aim of ensuring that the activities of the Council are understood by its various stakeholders and, as a result, its image and reputation are improved The Council / services regularly asks for feedback from its customers / clients The Council has a corporate complaints procedure <p>(NB: In some areas (e.g. Children's Services) additional complaints processes are in place to comply with legislation)</p>		
14.01	The Council can demonstrate that there is a process in place to ensure that staff are aware of all the relevant communications procedures - electronic, dealing with the media, advertising etc.	Staff induction checklists	
		Staff briefing sessions	
14.02	The Council can demonstrate that relevant managers and staff have received training in promoting effective communication; both internal and externally.	Included in PDRs	
14.03	The Council can demonstrate that there are appropriate processes in place to ensure that staff receive regular formal updates on corporate / Directorate / Service issues.	Arrangements for briefings	
14.04	The Council can demonstrate that all relevant staff are aware of the Councils feedback process	Briefings	
14.05	<p>The Council can demonstrate that it has a clear process for the recording feedback</p> <p>The Council has a standard for investigating complaints</p> <p>There is a clear record to show what action has been implemented as a result of the investigation</p>	Corporate complaints acknowledged, resolved and annually reported	

This Action Plan identifies the areas within the Governance Framework that require improvement						
	Area of Non-Compliance	Reason For Non-Compliance	Corrective Action Proposed	Timescale	Who By	Agreed
1						
2						
3						
4						
5						
6						