

Agenda Item	3
Report No	AC/27/24

The Highland Council

Committee: Audit

Date: 28 November 2024

Report Title: Code of Corporate Governance

Report By: Chief Officer - Legal and Corporate Governance

1. Purpose/Executive Summary

1.1 This report provides an update on progress with delivering the Local Code of Corporate Governance for 2023/24 and presents the proposed Code for 2024/25 for Members' approval.

2. Recommendations

2.1 Members are asked to:

- i. Note the progress on delivering the 2022/23 Code of Corporate Governance and
- ii. Approve the 2024/25 Code of Corporate Governance

3. Implications

3.1 Resource: There are no resource implications arising directly from this report.

3.2 Legal: There are no direct or immediate legal implications arising from this report

3.3 Community (Equality, Poverty, Rural and Island): There are no such implications arising directly from this report.

3.4 Climate Change / Carbon Clever: There are no such implications arising directly from this report.

3.5 Risk: There are no risk implications arising directly from this report. Approving the local Code of Corporate Governance annually is a requirement of good governance which forms an important element of the Council's Annual Governance Statement to external auditors.

3.6 Health and Safety (risks arising from changes to plant, equipment, process, or people): There are no such implications arising directly from this report.

3.7 Gaelic: No implications are envisaged from this report.

4. **Impacts**

4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.

4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.

4.3 This is an update report and therefore an impact assessment is not required.

5. **Background**

5.1 The Council is required to prepare a Code of Corporate Governance on an annual basis. This requirement is based on advice from Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE) on best practice on this matter.

5.2 The Council has also agreed that the Audit Committee would receive an annual report on the local Code to ensure proper scrutiny.

5.3 CIPFA and SOLACE published a Guidance Note for Scottish Authorities- Delivering Good Governance in Local Government. This provides guidance on implementing the Framework and provides an important foundation to enable local authorities to review effectiveness and to identify continuing improvements in governance arrangements.

5.4 The Framework and Guidance are based on seven core principles each with a number of sub-principles. The core principles are:-

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

5.5 This report advises on the status of the actions identified and agreed in the Local Code of Corporate Governance for 2023/24 and presents the proposed Code of Corporate Governance for 2024/25 for approval.

6. Local Code of Corporate Governance 2023/24

6.1 The Code of Corporate Governance 2023/24 was agreed by this Committee in September 2023 and a copy can be found at :-

https://www.highland.gov.uk/download/meetings/id/82239/8_code_of_corporate_governance

6.2 The progress in delivering the actions set out in the Code is monitored quarterly through the Council's Performance Recording and Management System (PRMS). The 2023/24 Code contained a total of eighty-six actions, eight-five of which are shown as complete or on target. The remaining action which has been identified as having some slippage relates to the ongoing review of Financial Regulations and Contract Standing Orders which has been delayed as a result of the senior management restructure.

6.3 The format of the Code has been one used for a number of years. As part of wider improvement activity the format and content have been revised. The improvement work will continue and will be reflected in the 2025/26 Code.

7. Code of Corporate Governance 2024/25

7.1 The proposed Code of Corporate Governance is set out in Appendix One.

Designation: Chief Officer - Legal and Corporate Governance

Date: 15 November 2024

Author: Stewart Fraser, Chief Officer - Legal and Corporate Governance

Principle A - Behaving with Integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law

Sub Principle: Behaving with Integrity

Action Description	Commitment	Further Comments	Responsible Officer
All Councillors have agreed to abide by the Councillors' Code of Conduct, Protocol for relations between Councillors and Employees and the Nolan Principles.	Code of Conduct & Nolan Principles	-	Chief Officer Legal & Corporate Governance
Programme of Member Training and Development being developed which will continue to reinforce conduct and integrity as core principles. Programme will consider further training on regulatory issues such as planning, information management and the Code of Conduct. Member Induction and ongoing training programme with emphasis on the principle of Councillors behaving with integrity at all times. Report to Council on an annual basis on the uptake of Member training and development.	Member Training and Development		Chief Officer Legal & Corporate Governance
All Officers are required to comply with the Code of Conduct for Officers and Protocol for relations between Councillors and Employees and compliance forms part of the induction for new employees	Code of Conduct for Employees		Head of HR

Sub Principle: Demonstrating strong commitment to ethical values

Action Description	Commitment	Further Comments	Responsible Officer
Council Standing Orders set out the Council's governance arrangements and how decisions are made, and they are reviewed annually	Council Standing Orders		Chief Officer Legal & Corporate Governance
Compliance with the Councillors' Code of Conduct monitored via annual report to Audit Committee	Councillors' Code of Conduct		Chief Officer Legal & Corporate Governance
Code of Conduct for Employees in place and compliance managed through HR policies and	Code of Conduct for Employees		Head of HR

procedures including Grievance, Capability and Disciplinary.			
Financial Regulations and Contract Standing Orders reinforce the ethical values of the Council including in the awarding of contracts to third party organisations.	Financial Regulations and Contract Standing Orders	Mandatory Training Course on Traineasy	Strategic Lead Corporate Audit / Chief Officer Corporate Finance
Sub Principle: Respecting the Rule of the Law			
Action Description	Commitment	Further Comments	Responsible Officer
Statutory Officers are appointed and their responsibilities set out in the Scheme of Delegation. Where appropriate Statutory Officers are part of the Council's Corporate Management Team.	Scheme of Delegation		Chief Executive
Council's Scheme of Delegation sets out the authority delegated to committees and officers and supports compliance with statutory and legislative obligations and is reviewed annually	Scheme of Delegation		Chief Officer Legal & Corporate Governance
The Council's Internal Audit Team undertake investigations into complaints alleging any misconduct or lack of compliance with corporate procedures.	Audit		Strategic Lead Corporate Audit
A Whistle-Blowing Policy is in place and reviewed regularly.	Whistle-Blowing Policy		Strategic Lead Corporate Audit
Financial Regulations and Contract Standing Orders are reviewed regularly to ensure compliance with statutory and legislative obligations	Financial Regulations and Contract Standing Orders		Chief Officer Corporate Finance
HR policies and procedures are in place to deal with Grievance, Capability and Disciplinary matters relating to employees.	HR Policies		Head of HR

Principle B - Ensuring openness and comprehensive stakeholder engagement

Sub Principle: Openness

Action Description	Commitment	Further Comments	Responsible Officer
Standing Orders for conducting Council business promote openness and transparency with all decisions made in public (unless exemptions under the Act apply) and all agendas and papers published in advance on the Council Website.	Standing Orders	-	Chief Officer Legal & Corporate Governance
All meetings of the Council, Strategic, Audit and Regulatory Committees are webcast and archived for one year for public access.	Openness		Assistant Chief Executive Corporate
Continue to develop participatory budgeting across the Council area to encourage community participation in resource allocation. Area Place Plans specifically set out shared community priorities.	Participatory Budgeting	During 2023/24. specific participatory resourcing approaches have been taken through the Whole Family Wellbeing programme. A number of Area Committees have devolved local car park income directly to local community councils and trusts to direct within their local area.	Chief Officer Housing and Communities
Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken, including Equality, Gaelic, Rural/Island and Poverty Impact Assessments.	Integrated Impact Assessment	A revised approach to impact assessment was agreed by Council in June 2024 and Implemented from July 2024. This includes updated guidance and training for staff and members and a new style of committee report format to support implementation.	Assistant Chief Executives

Sub Principle: Engaging comprehensively with institutional stakeholders

Action Description	Commitment	Further Comments	Responsible Officer
<p>The Council is one of five lead partners within the Highland Community Planning Partnership. Work with partners to improve evidencing outcomes and performance reporting in order to deliver improved outcomes for Highland communities.</p>	<p>Highland Outcome Improvement Plan</p>	<p>The CPP Board agreed to reset the Highland Outcome Improvement Plan in September 2023. Following a period of partner and stakeholder engagement, a revised HOIP was agreed in June 2024 – aligned with individual organisational delivery plans and designed to address the strategic challenges facing Highland. The HOIP is supported by a delivery plan which sets out core partnership actions and delivery mechanisms.</p>	<p>Chief Executive</p>
<p>The Council engages with the voluntary and community sector through the Community Planning Partnership and the Highland Third Sector Interface as well as directly with community bodies, including Community Councils.</p>	<p>Community Planning Partnership</p>	<p>Third, community and voluntary sector partners are involved in community planning both local – through community Partnerships – and pan-Highland through strategic partnership groups. There has been a broader approach taken to engagement across the Council with a focus on greater participation of communities in service, design, delivery and priority setting. This takes a range of forms through direct targeted service specific engagement e.g. with tenants groups, children and family providers, through more general community engagement such as budget engagement and development of area place plans</p>	<p>Chief Officer Housing and Communities</p>
<p>The Council has strong engagement with the Police Service of Scotland and Scottish Fire & Rescue Service with scrutiny at both a strategic and local level.</p>	<p>Police Service of Scotland and Scottish Fire & Rescue Service engagement.</p>	<p>Police and Fire scrutiny continues through Area Committees and twice a year through the Communities and Place Committee.</p>	<p>Chief Officer Housing and Communities</p>

<p>The Highland Council is the lead organisation for the Inverness and Highland City-Region deal which is being delivered by a local partnership including Highlands and Islands Enterprise, the University of Highlands and Islands and Albyn Housing Society Ltd. Funding is provided through the Scottish and UK governments and is managed by the Council.</p>	<p>Highland City-Region Deal.</p>	<p>Regular monitoring reports are brought to the Economy and Infrastructure Committee</p> <p>Members' Monitoring Group is in place and meets regularly</p> <p>Inverness Castle Delivery Group, jointly Chaired by Inverness City Leader and Fergus Ewing MSP.</p> <p>Regular Internal audit reviews will be undertaken.</p>	<p>Assistant Chief Executive Place, Strategic Lead Corporate Audit</p>
<p>The Council has been successful in being awarded support from the Levelling Up Fund.</p>	<p>Levelling Up Fund.</p>	<p>A Programme Board has been established with stakeholders to oversee the delivery of the improvements to the Northern Meeting Park and the Bught. The Board is chaired by the Inverness City Leader.</p>	<p>Assistant Chief Executive Place</p>
<p>The Highland Council has agreed to act as 'Accountable Body' for the Inverness and Cromarty Firth Green Freeport.</p>	<p>'Accountable Body' for the Inverness and Cromarty Firth Green Freeport</p>	<p>Members' Monitoring Group is in place and meets regularly.</p> <p>The Council appoints one Director to the Inverness and Cromarty Firth Freeport Board. This is currently the Assistant Chief Executive-Place.</p>	<p>Assistant Chief Executive Place</p>
<p>The Council has a Health & Social Care Partnership with NHS Highland, based on a lead agency model, with NHS responsible for Adult Services and the Council responsible for Children's Service.</p>	<p>Health & Social Care Partnership with NHS Highland</p>	<p>Joint Monitoring Committee made up of representatives from the Council, NHS Highland and the third sector is in place and meets regularly.</p>	<p>Assistant Chief Executive – People / Chief Social Work Officer</p>
<p>The Council has a Staff Partnership Forum in place for engagement with Trade Unions. Trade Unions are also represented on the Council's Redesign Board.</p>	<p>Staff Partnership Forum</p>		<p>Head of HR</p>

Sub Principle: Engaging with individual citizens and service users effectively

Action Description	Commitment	Further Comments	Responsible Officer
As part of the Redesign process, the Council agreed to be more community-minded by listening locally, widening participation in decision-making, supporting community bodies to do more and to target support to particular people and places most in need.	My Council	As part of the My Council programme, the Council has agreed a new Customer Experience Strategy, which has been developed with involvement from the Council's customers.	Chief Executive
Community engagement is undertaken on a variety of service and policy issues and led by Service Managers	Community Engagement	The My Council project considers how to both improve customer experience of contacting the Council and also how individuals wish to engage with the Council.	Assistant Chief Executives / Community Development Managers
The Council engages with specific user groups on a range of issues including our tenants, through the tenant participation network, with parents through our Parent Councils and with young people through the youth work service and the Highland Youth Parliament.	Tenant Participation Network Parent Councils Highland Youth Parliament		Assistant Chief Executives / Chief Officer Housing and Communities
The Council holds a contact database of groups with an interest in equality, diversity and human rights issues and liaises with these groups to share information, engage and seek views on a range of issues.	Equality		Senior Community Development Manager (North and East)

The Council has developed processes to support the aims, objectives and duties contained within the Community Empowerment Act. This supports communities to participate in the allocation of budgets, to be involved in improving service outcomes and to take on buildings or land in order to increase the benefits to the wider community.	Community Empowerment Act		Senior Community Development Managers
The Council supports a network of community councils and engages and consults with them on a regular basis and on a range of issues in order to determine community views and responses from local communities.	Community Council Engagement	Scheme of establishment for Community Councils to be reviewed commencing December 2024.	Senior Community Development Managers (Mid and West)
Under the Community Empowerment Act the Highland Community Planning Partnership has established 9 local partnerships which are engaging with communities to identify local issues and how outcomes can be improved for the local community, with a specific focus on reducing inequalities.	Highland Community Planning Partnership		Community Development Managers

Principle C - Defining Outcomes in terms of sustainable economic, social and environmental benefits			
Sub Principle: Defining Outcomes			
Action Description	Commitment	Further Comments	Responsible Officer
The Highland Council Programme for 2022-27 'Our Future Highland' set out goals based on five priorities: A Fair and Caring Highland; Resilient and Sustainable Communities; Accessible and Sustainable Highland Homes; A Sustainable Highland Environment and Global Centre for Renewable Energy; A Resilient and Sustainable Council. The new Council Programme is	Highland Council Programme	In March Council agreed a three-year Delivery Plan 2024-2027 which aligns the Budget Strategy for 2024-2027 and the revised Highland Outcome Improvement Plan (HOIP). The Delivery Plan 2024-2027 flows from the Council Programme 2022-2027 and the Performance Plan 2022-2027. It will provide a managed approach	Chief Executive

supported by a performance framework including Performance Plan and Service Plans which set out how performance and delivery will be monitored.		to implementing the Council's strategic priorities and achievement of financial sustainability through the delivery of medium-term financial planning approach over the next 3 years and beyond.	
Redesign projects and initiatives aligned to the Council Delivery Plan	Redesign	Core transformation projects now align to the 6 portfolios within the Delivery Plan. Certain of those projects have been identified for taking forward through the Redesign Board where the direct involvement of Elected Members is key.	Chief Officer Business Solutions
Annual Corporate Performance Report presented to Council to monitor delivery of outcomes and priorities.	Annual Corporate Performance Report		Chief Officer – Business Solutions
Sub Principle: Sustainable economic, social and environmental benefits			
Action Description	Commitment	Further Comments	Responsible Officer
The Council's Redesign Board is focused on the Council being more open-minded to new ways of delivering services, more community-minded and more commercially-minded to ensure service delivery is sustainable, affordable and aware of community impacts.	Redesign	As referred to above, certain of the key transformational projects within the Delivery Plan are being taken forward through the redesign process.	Chief Officer Business Solutions
The Highland Investment Plan (agreed May 2024) incorporates existing capital programme elements, new commitments for roads and infrastructure, as well as future plans for the school, depot, and office estate and for co-location/codelivery with key partners. The plan aims to transform the asset base of Highland Council, such as schools and other premises to centres of community service delivery known as points of delivery (PODs)	Highland Investment Plan		Assistant Chief Executive – Place, Chief Officer Corporate Finance

Corporate Risk Management is undertaken to ensure that the Council identifies and mitigates its key risks, in order to deliver its priorities and outcomes, and reported to every Audit Committee.	Risk Management	A revised Corporate Risk Management Policy was approved by the Audit Committee in January 2024. This was supported by a new risk appetite statement which was approved by Council in March 2024.	Strategic Lead - Corporate Audit
Service Risks managed in accordance with the Corporate Risk Management Policy and reported to Strategic Committees	Risk Management		Strategic Lead - Corporate Audit/ Chief Officer Business Solutions
Budget management is the responsibility of budget holders and monitoring reports are presented to Committee quarterly.	Budget Management		Chief Officer Corporate Finance / Assistant Chief Executives
The Council has developed a Medium Term Financial Plan to support the delivery of statutory responsibilities.	Medium Term Financial Strategy	In February 2024 the Council agreed a Medium Term Financial Plan for 2024/25 – 2026/27, the proposed revenue budget and council tax for 2024/25, and indicative revenue budgets for the following two financial years, 2025/26 and 2026/27 including recommendations relating to budget assumptions, financial flexibilities, pressures and investment, savings, reserves and council tax. The Plan was developed and informed by budget engagement undertaken by the Council, and with input our communities, citizens, staff and members provided.	Chief Officer Corporate Finance

PRINCIPLE D – Determining Interventions necessary to optimise the achievement of the intended outcomes

Sub Principle: Determining Interventions

Action Description	Commitment	Further Comments	Responsible Officer
The Redesign Board’s approach includes a core programme of work and targeted lean reviews. These are overseen by the Redesign Board made up of Members and Trade Union representatives.	Redesign		Chief Officer Business Solutions
Options appraisals are undertaken to support significant changes in service delivery and used to inform decision making.	Integrated Impact Assessment Screening		Assistant Chief Executives / Chief Officer Housing and Communities
Financial Approach, agreed by Council, which includes prioritisation of services to manage competing demands within limited financial resources	Financial Approach		Chief Officer Corporate Finance
Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken, including Equality Impact Assessments	Guidance for Report Writing Risk. Integrated Impact Assessment		Chief Officer Legal and Corporate Governance

Sub Principle: Planning Interventions

Action Description	Commitment	Further Comments	Responsible Officer
Performance is reported quarterly to Strategic Committees for scrutiny.	Performance Plan Service Plan Delivery Plan		Assistant Chief Executives / Chief Officer Business Solutions
Performance management arrangements includes quarterly performance reports to Committees for scrutiny. Ongoing performance management/ monitoring is managed through the Council’s Performance & Risk Management System	Performance Management		Chief Officer Business Solutions
The Council is subject to continuous external review on the delivery of Best Value (BV). BV work is now fully integrated into the annual external audit work	Best Value	External Audit reports including any BV findings will be reported to the Audit Committee. Progress on addressing any	Strategic Lead Corporate Audit

from 2023/24. This means that each year a BV thematic is identified and the outcome is reported in their Annual Audit Report (AAR). The Council's AARs will be reviewed by the Accounts Commission once over the five-year period. This means that the Council will receive a report summarising the BV period between October 2023 and August 2027.		BV recommendations will also be reported to Council on an annual Basis.	
The Council has agreed a three-year Delivery Plan 2024-2027 which aligns the Budget Strategy for 2024-2027 and the revised Highland Outcome Improvement Plan (HOIP). The Delivery Plan 2024-2027 flows from the Council Programme 2022- 2027 and the Performance Plan 2022-2027. It will provide a managed approach to implementing the Council's strategic priorities and achievement of financial sustainability through the delivery of medium-term financial planning approach over the next 3 years and beyond.	Delivery Plan	The Council has agreed a comprehensive performance and reporting regimen to support the delivery of the outcomes of the Delivery Plan including annual report to Council, regular reporting to strategic committees and the establishment of officer led Portfolio Boards.	Chief Executive
PRINCIPLE E – Developing the entity's capacity including the capability of its leadership and the individuals within it.			

Sub Principle: Developing the entity's capacity

Action Description	Commitment	Further Comments	Responsible Officer
Performance against Statutory Performance Indicators and comparison with performance against other Scottish Councils is reported to Council annually.	Performance Management		Chief Officer Business Solutions
Budget monitoring is reported to Committee quarterly and the Annual Accounts are reported to Audit Committee and Council	Budget Monitoring		Chief Officer Corporate Finance
Performance management arrangements include quarterly performance reports to committees for scrutiny and an Annual Performance Report to Council. Ongoing performance management/	Performance Management		Chief Officer Business Solutions

monitoring is managed through the Council's Performance and Risk Management System (PRMS)			
Corporate Workforce Strategy in place and development of Service and Corporate Workforce Plans in progress	Corporate Workforce Strategy		Head of HR
The remit and work plan for the Council's Redesign Board was initially agreed by the Council in June 2017. The Board met in September 2022 to agree an initial portfolio of major strategic projects for consideration and to re-establish a programme of Lean/Rapid Reviews. The redesign process is now aligned with the Delivery Plan, with certain projects being progressed through that route where that will add value. The work of the Council's Redesign Board places staff at the centre of identifying the change that is needed and implementing that change. This includes staff involvement in peer reviews of services, in Lean reviews of functions, peer spending reviews and in communicating improvement ideas. The Redesign Board reports directly to the Council.	Redesign Board		Chief Officer Business Solutions
A number of significant Partnerships in place which deliver benefits in terms of efficiency and service improvement – for example Health & Social Care Partnership, High Life Highland, Highland City Region Deal and the Inverness and Cromarty Firth Green Freeport.	Partnership Working		Assistant Chief Executives
Sub Principle: Developing the capability of the entity's leadership and other individuals			
Action Description	Commitment	Further Comments	Responsible Officer
Job and Role Descriptions in place for Officers and Elected Members and effective arrangements in place for joint working.	Job and Role Descriptions		Chief Executive
Corporate Health & Well-being Strategy in place supported by an Occupation Health provider and strong trade union engagement through Health &	Corporate Health & Well-being Strategy	In March 2020 the Council launched an Employee Assistance Programme including free confidential service for all staff, their partners and dependants over	Head of HR

Safety Committees and a network of trade union Health & Safety Representatives.		the age of 16. Carers Positive Policy launched June 2023.	
The Employee Review & Development process ensures that all employees have an annual review of their objectives, performance and support for their training and development needs.	Employee Review & Development	'Traineesy' will be used to support the recording of ERDS. The process has been revised and relaunched in Summer 2023.	Assistant Chief Executives / Head of HR
On-going Member Development Programme is being developed to support individual and collective capacity and capability.	Member Training	Development of the refreshed Programme which will include elements of knowledge testing and attendance reporting is progressing. There will be a report on Member training to Council in December 2024	Chief Officer – Legal and Corporate Governance

PRINCIPLE F – Managing the risks and performance through robust internal control and strong public financial management

Sub Principle: Managing Risk

Action Description	Commitment	Further Comments	Responsible Officer
Corporate Risk Management is undertaken to ensure that the Council identifies and mitigates its key risks, in order to deliver its priorities and outcomes, and reported to every Audit Committee. Risks associated with the Delivery Plan are monitored by Portfolio Boards and reported to Strategic Committees in line with the Portfolio Reporting schedule	Risk Management	Corporate Risk Management Policy incorporating risk Appetite agreed in March 2024	Assistant Chief Executives / Strategic Lead – Corporate Audit
Project Management Policy in place which identifies the process for effective risk management and the reporting and governance arrangements required.	Risk Management – Project		Chief Officer Business Solutions
Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken including Integrated Impact Assessments	Report Writing		Assistant Chief Executives / Chief Officer Legal and Corporate Governance

Sub Principle: Managing Performance			
Action Description	Commitment	Further Comments	Responsible Officer
The Council has agreed a comprehensive performance and reporting regime to support the delivery of the outcomes of the Delivery Plan including annual report to Council, regular reporting to strategic committees and establishment of officer led Portfolio Boards.	Delivery Plan		Chief Executive / Assistant Chief Executives
Audit Committee in place which is chaired by an opposition Councillor provides effective oversight and assurance.	Audit Committee		Strategic Lead – Corporate Audit
Strategic Committee structure in place which supports policy development, effective decision making and scrutiny of delivery and performance. These are supported by sub-committees, Boards and member seminars/briefings where appropriate which will increase Councillor capacity to engage in policy development.	Strategic Committee		Chief Executive
Performance management arrangements include quarterly performance reports to Committees for scrutiny and an Annual Performance Report to Council. Ongoing performance management/ monitoring is managed through the Council's Performance & Risk Management System (PRMS).	Performance Management		Chief Executive Chief Officer – Business Solutions
An annual report on the Performance Plan including analysis against targets, benchmarks, family group and national averages.	Performance Plan	In March annually the Council considers a report on Statutory Performance Indicators and the Local Government Benchmarking Framework. This annual approach is being reviewed. In September annually the Council receives an annual performance report centred on delivery of the Performance Plan.	Chief Officer – Business Solutions
Performance against Statutory Performance Indicators and comparison with performance against	SPI / LGBF Report	This information reporting on Statutory Performance Indicators and the Local	Chief Executive –

other Scottish Councils is reported to Council annually.		Government Benchmarking Framework has traditionally been reported to Council in March each year.	Chief Officer – Business Solutions
Sub Principle: Robust Internal Control			
Action Description	Commitment	Further Comments	Responsible Officer
Audit Committee receives an Annual Internal Audit Report which provides an audit opinion upon the adequacy and effectiveness of the Council's framework of governance, risk management and control.	Internal Audit	This is reported annually to the June meeting of the Audit Committee.	Strategic Lead Corporate Audit
Sub Principle: Managing Data			
Action Description	Commitment	Further Comments	Responsible Officer
PSN Accreditation is assessed annually through an external IT security health check to provide assurance about network and infrastructure security in relation to personal and other sensitive data.	PSN Accreditation		Chief Officer Business Solutions
Access to IT systems and data is controlled using a layered approach. Network access is either via Scottish Wide Area Network (SWAN) - a secure public sector network linking all Council sites - or via VPN for remote and home working. Users are authenticated via a cloud authentication service.	Network access via SWAN or VPN		Chief Officer Business Solutions
Information and Data Management Strategy and supporting policies in place, including handling of personal data, and management of records under the governance of the Information Governance Board chaired by the Assistant Chief Executive Corporate. Records Management Plan approved by National Records of Scotland.	Information Management and Data Strategy		Senior Information Risk Owner
Data Sharing Agreements in place with key partners to enable safe and secure sharing of data across other bodies.	Data sharing agreements		Data Protection Officer
Information is handled appropriately and securely. Staff receive appropriate training to handle	Information Management	Information management is a mandatory training element for employees.	Data Protection Officer

information. Risks associated with information assets are regularly reviewed.			
Sub Principle: Strong public financial management			
Action Description	Commitment	Further Comments	Responsible Officer
The Council has developed a Medium Term Financial Plan to support the delivery of statutory responsibilities.	Medium Term Financial Strategy	In February 2024 the Council agreed a Medium Term Financial Plan for 2024/25 – 2026/27, the proposed revenue budget and council tax for 2024/25, and indicative revenue budgets for the following two financial years, 2025/26 and 2026/27 including recommendations relating to budget assumptions, financial flexibilities, pressures and investment, savings, reserves and council tax. The Plan was developed and informed by budget engagement undertaken by the Council, and with input our communities, citizens, staff and members. have provided.	Chief Officer Corporate Finance
Budget monitoring is reported to Committee quarterly and the Annual Accounts are reported to Audit Committee and Council.	Budget Monitoring		Chief Officer Corporate Finance

PRINCIPLE G – Implementing good practice in transparency, reporting and audit to delivery effective accountability			
Sub Principle: Implementing good practice in transparency			
Action Description	Commitment	Further Comments	Responsible Officer
Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken including Integrated Impact Assessments	Integrated Impact Assessments		Assistant Chief Executives / Chief Officer Legal and Corporate Governance
All Agendas and accompanying reports are published on the Council's Website and all Council, Strategic and Regulatory Meetings are webcast and archived for public access	Openness		Assistant Chief Executive Corporate

Sub Principle: Implementing good practice in reporting			
Action Description	Commitment	Further Comments	Responsible Officer
Annual and Quarterly reporting on Performance and Budget Monitoring, to Council and Strategic Committees	Performance and Budget Monitoring		Chief Officer Corporate Finance / Chief Officer – Business Solutions
Annual Governance Statement published as part of Annual Accounts and reported to Council and Audit Committee	Annual Governance Statement		Chief Officer Corporate Finance/ Strategic Lead Corporate Audit/ Chief Officer Legal and Corporate Governance
Code of Corporate Governance reviewed annually and reported to Audit Committee	Code of Corporate Governance		Chief Officer Legal and Corporate Governance
Sub Principle: Assurance and effective accountability			
Action Description	Commitment	Further Comments	Responsible Officer
Internal Audit Plan agreed annually and all audits are reported to Audit Committee, also tracking of actions arising from reports is monitored by the Committee.	Internal Audit		Strategic Lead Corporate Audit
Internal Audit Service in place which reports directly to the Audit Committee. Internal Audit Service must comply with the Public Sector Internal Audit Standards (PSIAS)/ Global Internal Audit Standards (GIAS)	Internal Audit	Conformance on compliance with the PSIAS/ GIAS is confirmed within the Internal Audit Annual report provided to the Audit Committee.	Chief Executive / Strategic Lead Corporate Audit
National and Performance Audits issued by Audit Scotland are reported to Council and/or Audit Committee to ensure that the Council takes any learning points and actions necessary.	Audit	Reports submitted to Council, Audit & Scrutiny or Strategic Committee as appropriate.	Chief Executives / Assistant Chief Executives / Strategic Lead Corporate Audit
Scrutiny of key partnerships undertaken at Council and Strategic Committees and annual reports of ALEO's made to appropriate Committee	Scrutiny of ALEOs		Assistant Chief Executives