

Enquiries to Democratic Services

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Date: 9th March 2026

Our Ref: MM

Dear Sir/Madam,

A meeting of the **AUDIT & STANDARDS COMMITTEE** will be held in the Council Chamber, Town Hall, Nuneaton, on **Tuesday, 17th March 2026** at **6.00pm**

Yours faithfully,

TOM SHARDLOW

Chief Executive

To: All Members of the
Audit & Standards
Committee

Councillors J. Bonner (Chair), D. Brown
(Vice-Chair), A. Bull, T. Cooper,
L. Cvetkovic, B. Hancox, J. Hartshorn,
T. Jenkins, W. Markham, C. Smith,
M. Wright and Mr A. Morgan.

The Council is committed to providing a safe and respectful environment for both our staff, our customers and elected members. As such, please be advised that any form of abuse, aggression, or disrespectful behaviour towards our team will not be tolerated under any circumstances.

A G E N D A

PART I - PUBLIC BUSINESS

1. ANNOUNCEMENTS

To advise the meeting participants of the procedure that will be followed by the Members of the committee.

A fire drill is not expected, so if the alarm sounds please evacuate the building quickly and calmly. Please use the stairs and do not use the lifts. Once out of the building, please gather outside Lloyds Bank on the opposite side of the road.

Exit by the door by which you entered the room or by the fire exits which are clearly indicated by the standard green fire exit signs.

If you need any assistance in evacuating the building, please make yourself known to a member of staff.

Please also make sure all your mobile phones are turned off or set to silent.

2. APOLOGIES - To receive apologies for absence from the meeting.

3. MINUTES – To confirm the minutes of the meeting of the Audit and Standards Committee held on 3rd February 2026, attached (**Page 5**) and the extraordinary meeting of the Audit and Standards Committee held on 24th February 2026, attached (**Page 8**).

4. DECLARATIONS OF INTEREST

To receive declarations of Disclosable Pecuniary and Other Interests, in accordance with the Members' Code of Conduct.

Declaring interests at meetings

If there is any item of business to be discussed at the meeting in which you have a disclosable pecuniary interest or non-pecuniary interest (Other Interests), you must declare the interest appropriately at the start of the meeting or as soon as you become aware that you have an interest.

Arrangements have been made so that interests that are declared regularly by members can be viewed in a schedule on the Council website ([Councillor Schedule of Declarations of Interests for Meetings](#)). Any interest noted in the schedule on the website will be deemed to have been declared and will be minuted as such by the Democratic Services Officer. As a general rule, there will, therefore, be no need for those Members to declare those interests as set out in the schedule.

There are, however, TWO EXCEPTIONS to the general rule:

1. When the interest amounts to a Disclosable Pecuniary Interest that is engaged in connection with any item on the agenda and the member feels that the interest is such that they must leave the room. Prior to leaving the room, the member must inform the meeting that they are doing so, to ensure that it is recorded in the minutes.
2. Where a dispensation has been granted to vote and/or speak on an item where there is a Disclosable Pecuniary Interest, but it is not referred to in the

Schedule (where for example, the dispensation was granted by the Monitoring Officer immediately prior to the meeting). The existence and nature of the dispensation needs to be recorded in the minutes and will, therefore, have to be disclosed at an appropriate time to the meeting.

Note: Following the adoption of the new Code of Conduct, Members are reminded that they should declare the existence and nature of their personal interests at the commencement of the relevant item (or as soon as the interest becomes apparent). If that interest is a Disclosable Pecuniary or a Deemed Disclosable Pecuniary Interest, the Member must withdraw from the room.

Where a Member has a Disclosable Pecuniary Interest but has received a dispensation from Audit & Standards Committee, that Member may vote and/or speak on the matter (as the case may be) and must disclose the existence of the dispensation and any restrictions placed on it at the time the interest is declared.

Where a Member has a Deemed Disclosable Interest as defined in the Code of Conduct, the Member may address the meeting as a member of the public as set out in the Code.

Note: Council Procedure Rules require Members with Disclosable Pecuniary Interests to withdraw from the meeting unless a dispensation allows them to remain to vote and/or speak on the business giving rise to the interest.

Where a Member has a Deemed Disclosable Interest, the Council's Code of Conduct permits public speaking on the item, after which the Member is required by Council Procedure Rules to withdraw from the meeting.

5. PUBLIC CONSULTATION - Members of the Public will be given the opportunity to speak on specific agenda items, if notice has been received.

Members of the public will be given three minutes to speak on a particular item and this is strictly timed. The chair will inform all public speakers that: their comments must be limited to addressing issues raised in the agenda item under consideration: and that any departure from the item will not be tolerated.

The chair may interrupt the speaker if they start discussing other matters which are not related to the item, or the speaker uses threatening or inappropriate language towards Councillors or officers and if after a warning issued by the chair, the speaker persists, they will be asked to stop speaking by the chair. The chair will advise the speaker that, having ignored the warning, the speaker's opportunity to speak to the current or other items on the agenda may not be allowed. In this eventuality, the chair has discretion to exclude the speaker from speaking further on the item under consideration or other items of the agenda.

6. INTERNAL AUDIT PLAN REPORT 2026-27 – a report of the Audit Manager, attached (**Page 10**).
7. INTERNAL AUDIT PROGRESS REPORT – a report of the Audit Manager, attached (**Page 30**).
8. CONSTITUTION UPDATE – REPORT FROM CONSTITUTION REVIEW WORKING PARTY - a report of the Assistant Director – Democracy and Governance (Monitoring Officer), attached (**Page 53**).

9. REVIEW AND UPDATE OF THE MAYORAL PROTOCOL – a report of the Democratic Services Team Leader, attached (**Page 61**).
10. ANTI MONEY LAUNDERING FRAMEWORK & ANTI-FRAUD, CORRUPTION AND BRIBERY STRATEGY – a report of the Assistant Director – Democracy and Governance & Assistant Director – Finance, attached (**Page 96**).
11. FRAUD RESPONSE PLAN AND PARTNERSHIP FRAMEWORK - a report of the Assistant Director – Democracy and Governance & Assistant Director – Finance, attached (**Page 136**).
12. LOCAL CODE OF CORPORATE GOVERNANCE – a report of the Assistant Director – Democracy and Governance, attached (**Page 176**).
13. MEMBER INDUCTION PROGRAMME 2026 – a report of the Elections and Democratic Services Manager & Deputy Monitoring Officer, attached (**Page 243**).
14. OVERVIEW OF MEMBER COMPLAINTS - a report of the Monitoring Officer, attached (**Page 269**).
15. ANY OTHER ITEMS - which in the opinion of the Chair should be discussed as a matter of urgency because of special circumstances (which must be specified).

NUNEATON AND BEDWORTH BOROUGH COUNCIL

AUDIT & STANDARDS COMMITTEE

3rd February 2026

A meeting of the Audit & Standards Committee was held on Tuesday, 3rd February 2026 in the Council Chamber, Town Hall, Nuneaton.

Present

Councillor J. Bonner – Chair

Councillors: D. Brown (Vice-Chair), T. Cooper, L. Cvetkovic, B. Hancox, J. Hartshorn, W. Markham, C. Smith, M. Wright and Mr A. Morgan.

Absent: Councillor A. Bull and T. Jenkins.

PART I – PUBLIC BUSINESS

ASC27 **Minutes**

RESOLVED that the minutes of the Audit and Standards Committee meeting held on 25th November 2025 be approved and signed by the Chair.

ASC28 **Declarations of Interest**

RESOLVED that the declarations of interests are as set out in the Schedule which can be viewed on the Council website ([Councillor Declarations of Interests](#)).

ASC29 **Treasury Management Update 2025/26**

The Treasury and Technical Business Partner reported that the Council is required through the CIPFA Code of Practice on Treasury Management (the Code) and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code) to report to Full Council a quarterly report.

This report to the Committee set out the Council's treasury position as at 30th December 2025 and therefore any decisions made after this date are not reflected in this report.

RESOLVED that
IT BE RECOMMENDED TO COUNCIL that

- a) the Treasury Management Report for 2025/26 - Quarter 3 report be noted; and
- b) the update to the Treasury Management Practices in Appendix A of the report (TMP 5) be approved.

ASC30 **Treasury Management Practices 2026/27**

A Report of the Treasury and Technical Business Partner provided the Committee with the reviewed Treasury Management Practices (TMPs) for approval.

RESOLVED that

- a) the updated TMPs be noted; and
- b) **IT BE RECOMMENDED TO COUNCIL** that the updated TMPs be approved.

ASC31 **Treasury Management Strategy Statement (TMSS) 2026/27**

The Treasury and Technical Business Partner reported that the Local Government Act 2003 and the Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice for Treasury Management in the Public Services (the Code) require Council's to "have regard to" the Prudential Code and to set Prudential Indicators for the forthcoming 3 years to ensure that the Council's capital investment plans are affordable, prudent and sustainable.

Regulations also require an Annual Investment Strategy, Treasury Management Strategy and Minimum Revenue Provision (MRP) Policy to be approved.

RESOLVED that

IT BE RECOMMENDED TO COUNCIL that the Treasury Management Strategy Statement including all Prudential Indicators, the MRP Policy and Annual Investment Strategy be approved.

ASC32 **Constitution Updates – Report from Constitution Review Working Group**

A Report of the Assistant Director – Democracy and Governance provided an opportunity for the Panel to consider and approve the recommendations from the Constitution Review Working Party and recommend changes to the Constitution.

RESOLVED that

IT BE RECOMMENDED TO COUNCIL that

- a) the number of signatories required for Motions on Notice be amended to one (1) Councillor and a Seconder;
- b) the Civic Honours Sub-Committee membership list be amended by removing 'The Cabinet Member - Finance and Corporate Services' and replace with 'One other Cabinet Member' as per Table 2 under 4.3.1 of the report;
- c) the Terms of Reference for the Shareholder Committee be included as per 4.4.2 of the report;
- d) It be ensured all public meetings have a Vice Chair appointed with effect from the 2026/2027 Municipal Year, as proposed in 4.5.1 of the report; and
- e) the wording under 4E.15 of the Constitution be amended as per Table 3 under 4.6.1. of the report.

ASC33 **Pre-Election Period Publicity Protocol**

A report of the Elections and Democratic Services Manager and Deputy Monitoring Officer provided Committee Members with details of the Publicity Protocol Guidance in the period leading to an Election/By-Election/Referendum/Petition as set out in Section 5G of the Council's Constitution.

RESOLVED that

- a) the Publicity Protocol Guidance as extracted from the Constitution (and set out at Appendix A to the report) be noted; and
- b) guidance be issued by the Monitoring Officer on the Publicity Protocol to Members and Officers ahead of the Pre-Election period, where requested by Officers and Members.

ASC34 **Review of the Council's Strategic Risk Register**

A report of the Assistant Director – Democracy and Governance presented the Council's Strategic Risk Register for review and comment by the Audit and Standards Committee, ensuring that identified risks remain relevant, sufficiently captured, and appropriately managed.

RESOLVED that the Strategic Risk Register (Third Quarter 2025/26) be noted.

ASC35 **Government Consultation: Strengthening The Standards And Conduct Framework For Local Authorities In England**

A report of the Elections and Democratic Services Manager and Deputy Monitoring Officer provided Committee Members with the outcome of the Government Consultation: Strengthening the Standards and Conduct Framework for Local Authorities in England that ended on 25 February 2025.

RESOLVED that

- a) the outcome of the Government Consultation: Strengthening the Standards and Conduct Framework for Local Authorities in England be noted; and
- b) further reports be received by the Audit and Standards Committee when updates are available and Legislation is passed.

Chair _____

NUNEATON AND BEDWORTH BOROUGH COUNCIL**AUDIT & STANDARDS COMMITTEE****24th February 2026**

An extraordinary meeting of the Audit & Standards Committee was held on Tuesday, 24th February 2026 in the Council Chamber, Town Hall, Nuneaton.

Present

Councillor J. Bonner – Chair

Councillors: A. Bull, T. Cooper, L. Cvetkovic, B. Hancox, J. Hartshorn, T. Jenkins, W. Markham, C. Smith, M. Wright, S. Markham (substitute for D. Brown) and Mr A. Morgan.

Absent: Councillor D. Brown (Vice-Chair).

PART I – PUBLIC BUSINESSASC36 **Declarations of Interest**

RESOLVED that the declarations of interests are as set out in the Schedule which can be viewed on the Council website ([Councillor Declarations of Interests](#)).

ASC37 **2024/25 Statement of Accounts**

A Report of the Strategic Director – Corporate Resources and External Auditors provided the final version of the 2024/25 Statement of Accounts for approval.

RESOLVED that

- a) amendments and adjustments to some figures within the report be noted and agreed as follows:
 - i. on page 92 of the agenda and reports – Balance Sheet. The net assets be changed from 444.6 million to 444.4 million.
 - ii. on page 94 of the agenda and reports - Council Reserves. Unusable reserves be increased from 391.8 million to 392.0 million.
 - iii. on page 101 of the agenda and reports - the table for the Comprehensive Income and Expenditure Statement. The figure for Surplus/Deficit on Revaluation of Property, Plant and Equipment be changed from 24.172 million to 23.834 million.
 - iv. On page 54 of the agenda and reports – Accounting policies, key judgements and estimates. The second paragraph under Summary of management approach should state 2023/24 rather than 2024/25. Authority be given to the S151 Officer to make the amendment to that section of the report.
- b) the Audit Opinion on the Statement of Accounts be noted;
- c) the Auditor's Completion Report be noted;
- d) the Statement of Accounts for 2024/2025 be approved and delegated authority be given to the Strategic Director – Corporate Resources and Chair of Audit and Standards Committee to sign the 2024/2025 Accounts;
- e) delegated authority be given to the Strategic Director – Corporate Resources and Chair of Audit and Standards Committee to sign the Letter of Representation;

- f) a face-to-face meeting between the Committee and External Auditors be arranged; and
- g) more information be received from the External Auditors relating to fees which will be broken down into hours charged by the engagement team, including a breakdown of hours for each area.

ASC38 **Exclusion of the Public and Press**

RESOLVED that under section 100A(4) of the Local Government Act 1972, the public and press be excluded from the meeting during consideration of the following item, it being likely that there would be disclosure of exempt information of the description specified in paragraph (7) of Part I and II of Schedule 12A to the Act.

PART II – EXEMPT ITEM/S

ASC39 **Auditor Completion Report Addendum 2024/25**

The Strategic Director – Corporate Resources and External Auditors reported on the confidential plan for ICT cyber security risks.

RESOLVED that the action plan be noted.

Chair _____

AGENDA ITEM NO. 6

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Audit and Standards Committee

Date of Meeting: 17th March 2026

Subject: Internal Audit Plan Report 2026-27

Portfolio: Not Applicable

Responsible Officer: Audit Manager

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Strive for transparency and
accountability, in all that we do.
Increase public scrutiny

Ward Relevance: All

Public or Private: Public

Forward Plan: Not applicable (not for Cabinet)

Subject to Call-in: Not applicable (not for Cabinet)

1. Purpose of report

- 1.1. The purpose of this report is for the Committee to approve the Internal Audit Charter and Annual Internal Audit Plan for 2026-27.

2. Recommendations

- 2.1. That the proposed Internal Audit Plan for 2025/26 (Attached at Appendix A) is considered and approved for implementation, subject to any changes agreed by the Committee.

- 2.2. That the Internal Audit Charter (Attached within Appendix A) is approved.

3. Background

- 3.1. Global Internal Audit Standard (GIAS) 9.4 requires the Chief Audit Executive (CAE) to create an internal audit plan that supports the achievement of the organisation's objectives. The CAE must base the internal audit plan on a documented assessment of the organisation's strategies, objectives, and risks. This assessment must be informed by input from the board and senior management as well as the CAE's understanding of the organisation's governance, risk management, and control processes.
- 3.2. The annual Audit Plan sets out proposals on how this will be achieved in the year ahead. It is a flexible Plan that allows Internal Audit to respond to emerging and changing risks during the year.
- 3.3. The Audit Plan must incorporate sufficient work to enable the Chief Audit Executive to give an opinion on the adequacy of the Council's overall control environment. Equally Internal Audit must be adequately resourced with the necessary level of skilled and experienced staff to deliver the Audit Plan.

1. Internal Audit Plan Report 2026-27

- 1.1. A report on the planned internal audit coverage for 2026-27

2. Consultation with the public, members, officers and associated stakeholders

- 2.1. None directly related to this report.

3. Financial Implications

- 3.1. None directly related to this report.

4. Legal Implications

- 4.1. None directly related to this report.

5. Equalities implications

- 5.1. Not applicable to this report.

6. Health implications

6.1. Not applicable to this report.

7. Climate and environmental implications

7.1. No direct climate and/or environmental implications have been identified.

8. Section 17 Crime and Disorder Implications

8.1. Not applicable to this report.

9. Risk management implications

9.1. The Internal Audit coverage contained within this Audit Plan, provides the Audit & Standards Committee and senior management with objective assurance on the Council's overall control environment, comprising the systems of governance, risk management, and internal control and highlights control weaknesses together with recommendations for improvement. This helps senior management demonstrate that they are managing the Council's risks effectively. Internal Audit's work significantly contributes to the Council's statutory Annual Governance Statement (AGS).

10. Human resources implications

10.1. No direct human resource implications have been identified.

11. Conclusion

11.1. This report demonstrates the planned Internal Audit coverage for 2026-27 and provides assurance that appropriate arrangements are in place to address identified risks and control weaknesses. The Audit & Standards Committee is invited to note the proposed coverage, consider whether it supports the achievement of the organisation's objectives, and endorse the proposed coverage to strengthen the Council's governance, risk management and internal control environment.

12. Appendices

12.1. Please note the following appendix:

- i. Appendix A – Internal Audit Plan Report 2026-27

13. Background papers

13.1. Please note there are no background papers attached to this report.

14. Report Writer Details:

Officer Job Title: Audit Manager

Officer Name: Adrian Manifold



Nuneaton & Bedworth Borough Council – Internal Audit Plan 2026-27 & Audit Charter

Audit & Standards Committee: 17th March 2026



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Our Vision

To bring about improvements in the control, governance and risk management arrangements of our Partners by providing cost effective, high quality internal audit services.

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Introduction

Purpose of Report

The purpose of this report is for the Board to approve the Internal Audit Charter and Annual Internal Audit Plan for 2026-27.

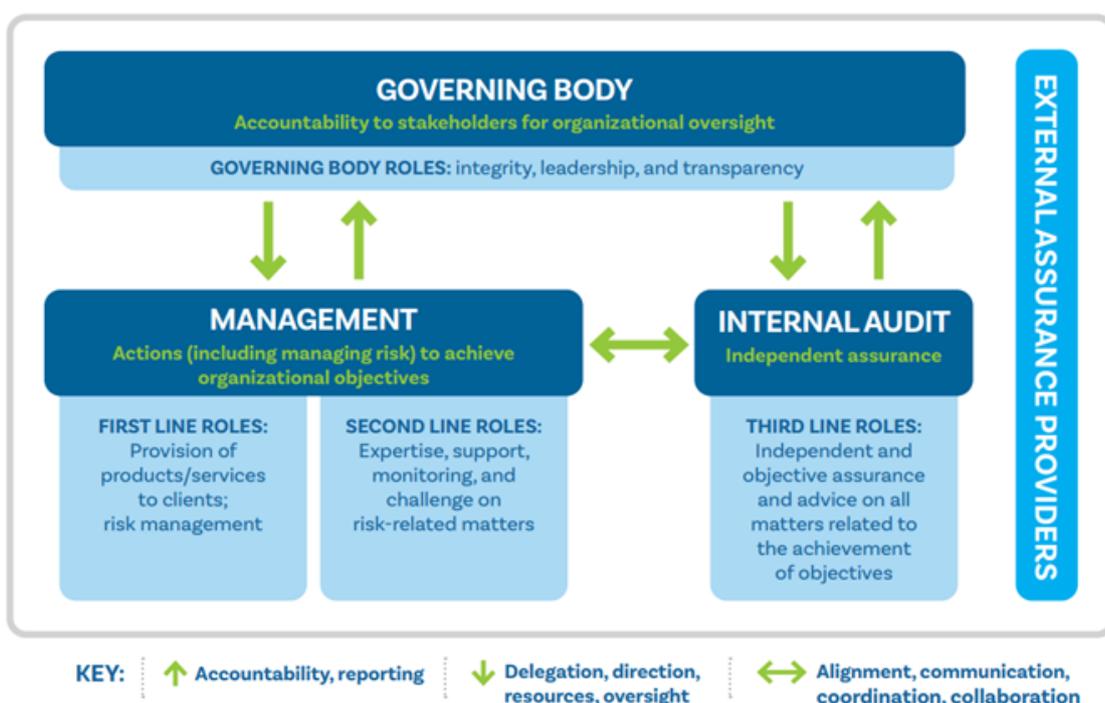
Role of Internal Audit

All local authorities must make proper provision for internal audit in line with the 1972 Local Government Act (S151) and the Accounts and Audit Regulations 2015.

The Council's Internal Audit service is provided by Central Midlands Audit Partnership (CMAP) The Partnership was formed as a Joint Board under section 101 of the Local Government Act 1972. It currently serves 11 public sector organisations and Derby City Council is the host authority. The current legal agreement between the Partners runs until 31st March 2030, although Local Government Reorganisation (LGR) will supersede those arrangements. From 1st April 2026 CMAP will cease delivery of service to one client organisation.

Internal Audit provides the Audit & Standards Committee and senior management with objective assurance on the Council's overall control environment, comprising the systems of governance, risk management, and internal control and highlights control weaknesses together with recommendations for improvement. This helps senior management demonstrate that they are managing the Council effectively. Internal Audit's work significantly contributes to the Council's statutory Annual Governance Statement (AGS).

Internal Audit is part of the Council's governance framework which can be summarised in the three lines model shown below.



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Nuneaton & Bedworth Borough Council – Audit Plan 2026-27

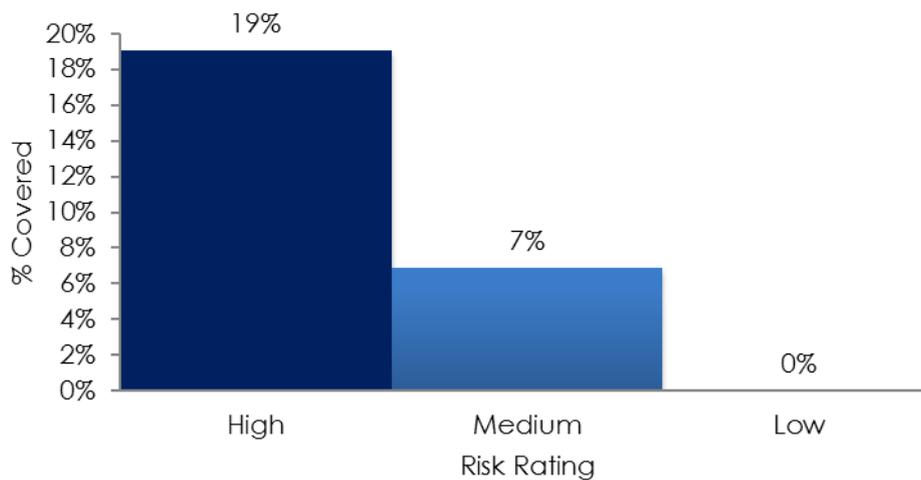
Internal Audit Plan

Global Internal Audit Standard (GIAS) 9.4 requires the Chief Audit Executive (CAE) to create an internal audit plan that supports the achievement of the organisation’s objectives. The CAE must base the internal audit plan on a documented assessment of the organisation’s strategies, objectives, and risks. This assessment must be informed by input from the board and senior management as well as the CAE’s understanding of the organisation’s governance, risk management, and control processes. The assessment must be performed at least annually. In this instance, the Chief Audit Executive is Adrian Manifold, Audit Manager.

The annual Audit Plan sets out proposals on how this will be achieved in the year ahead. It is a flexible Plan that allows Internal Audit to respond to emerging and changing risks during the year.

The Audit Plan must incorporate sufficient work to enable the Chief Audit Executive to give an opinion on the adequacy of the Council’s overall control environment. Equally Internal Audit must be adequately resourced with the necessary level of skilled and experienced staff to deliver the Audit Plan.

2026-27 Coverage of Auditable Areas by Risk Rating Category



Progress in completing the audit plan, will be submitted to the Audit & Standards Committee as part of regular Internal Audit Progress reports.

Internal Audit Charter

An Internal Audit Charter is a formal document that defines internal audit's purpose, authority, responsibility and position within an organisation. The Internal Audit Charter describes how internal audit will provide value to the Council, the nature of the services it will provide and the specific focus or emphasis required of internal audit to help the Council achieve its objectives.

GIAS 6.2 requires the Chief Audit Executive to develop and maintain an internal audit charter that specifies, at a minimum, the internal audit function’s:

- Purpose of Internal Auditing.
- Commitment to adhering to the Global Internal Audit Standards.

Nuneaton & Bedworth Borough Council – Audit Plan 2026-27

- Mandate, including scope and types of services to be provided, and the board's responsibilities and expectations regarding management's support of the internal audit function.
- Organisational position and reporting relationships.

A copy of the current Internal Audit Charter is attached at [Appendix B](#). It is the role of the Audit & Standards Committee to review and approve the 'Internal Audit Charter' on an annual basis.

Approach to Audit Planning

Internal Audit takes into account the Council’s risk management framework, including using risk appetite levels set by management for the different activities or parts of the Council. If a framework does not exist, Internal Audit must determine its own judgment of risks following a thorough consultation process. We endeavour to consult with relevant managers to further understand the risk areas where internal audit assurance will be appropriate.

A risk based audit plan has been compiled in consultation with the Council’s Management, using the Councils risk registers and CMAP's bespoke risk assessment model which considers the following 8 measures of risk

Impact	Materiality	Potentially, how much money could the Council lose if this area is not properly controlled?
	Criticality	How critical is this function to the effective running of the Council’s core activities?
	Sensitivity	How important is this area in the opinion of senior management and the Board?
	Strategic Effect	How does this function affect the Council’s long term aims and objectives?
Likelihood	Changes	What changes (staffing, procedural, IT, legislative) has this area been subject to?
	Complexity	How complex is the area under review?
	Review Process	How often is this area reviewed by audit and other agencies?
	Inherent Risks	How susceptible is this area to fraud and irregularity?

Once the scores for each of the 80 auditable areas identified have been input to the risk model, along with the date when the area was last audited, the risk model will automatically generate a plan of suggested audit coverage. Senior management are consulted on the proposed plan and their views are taken account of before producing the final, ranked list of areas to audit. This year's risk assessment identified 21 High risk areas, 58 Medium risk areas and 1 Low risk area.

Types of Audit Work

Key Financial Systems Audit - Much of internal audit's assurance work comes from the review of the risks and controls associated with the Council's financial systems.

External Audit will also review the work on the key financial systems to assist them when determining their opinion on Council's annual accounts.

Systems / Risk Based Audits - The auditor's prime role is to review the internal control systems developed by management to mitigate operational risks and report upon the adequacy of those controls (see below for control examples). A Council's overall internal control system is the product of all of those systems and processes that the Council has created to deliver its business objectives, both financial and non-financial.

Control categories with examples



Source: Chartered Institute of Internal Auditors – Resources – Control

IT Audit – Typically our IT auditing coverage focuses on the following:

- **Infrastructure** - Infrastructure audits cover perimeter defences, authentication, management and monitoring, and devices. Infrastructure audits help provide assurance that the organisation's private network is protected from internet attacks, unauthorised or inappropriate access via local or remote attacks, and also ensure the Council has the necessary monitoring and incident analysis to maintain and analyse the Network.
- **Applications** - Application audits cover thin and fat client applications, and both internal (Intranet) or external (Web) applications. Applications audits typically focus on CIAA (Confidentiality, Integrity, Availability and Accountability risks) to ensure attackers cannot exploit vulnerabilities to gain unauthorised access to sensitive corporate data.

Governance/Ethics Reviews - The governance framework comprises the systems and processes, and culture and values, by which the Council is directed and controlled. Internal Audit reviews corporate systems such as Risk Management, Health & Safety, Data Quality, Anti -Fraud and should consider organisational ethics, values and culture.

Nuneaton & Bedworth Borough Council – Audit Plan 2026-27

Procurement/Contract Audit - Procurement involves the process of acquisition from third parties and spans the whole life cycle from the initial concept (determining the need), through buying and delivery, to the end of a service contract. The audit approach to procurement should primarily concern the Council's corporate procurement strategy and associated management structures and processes, including contract procedure rules and detailed procurement guidance.

Client Support/Consultancy Work

The scope of the consultancy service that CMAP can offer is constrained by our skills set. Accordingly, consultancy work is likely to be on areas where the control framework is in development or subject to changes. The advice offered by Internal Audit in its consultancy role may include advising on the design and implementation of new policies, processes, and systems; providing forensic/analytic services; providing training; and facilitating discussions about risks, controls and governance arrangements.

To support the Council, time has also been set aside in the Audit Plan for the following:

Audit Management – There are certain management tasks that are specific to each Partner organisation, such as, reporting to Audit Committee, Audit Risk Assessment & Planning etc. These require a contingency of time to be planned.

Advice & Emerging Issues - On an ad-hoc basis, Audit is called upon to provide risk and control advice on issues throughout the Council. This consultancy work is a very important service and requests for Audit input are considered to be a good measure of the quality of the Audit service and of the satisfaction of our clients.

Anti-Fraud/Probity/Investigations - Internal audit has an important role to play in ensuring that management has effective systems in place to detect and prevent corrupt practices within the Council. Internal audit's role includes promoting anti-fraud best practice, testing and monitoring systems through probity work and advising on change where it is needed. Internal Audit also may be involved, on a consultancy basis, in the investigation of suspected internal fraud, theft or major irregularity (where there is some form of alleged financial irregularity, which may have resulted in financial loss to the Council).

Follow-up Audits - Internal Audit is committed towards ensuring that control improvements are achieved and all agreed actions are acted upon. We have developed a recommendation tracking database, which allows us to monitor, follow-up and report upon the status of all management's actions in respect of agreed audit recommendations.

Brought Forward Jobs - A number of incomplete audits from the 2025-26 Audit Plan will need to be concluded in 2026-27.



Appendix A - Audit Plan Detail

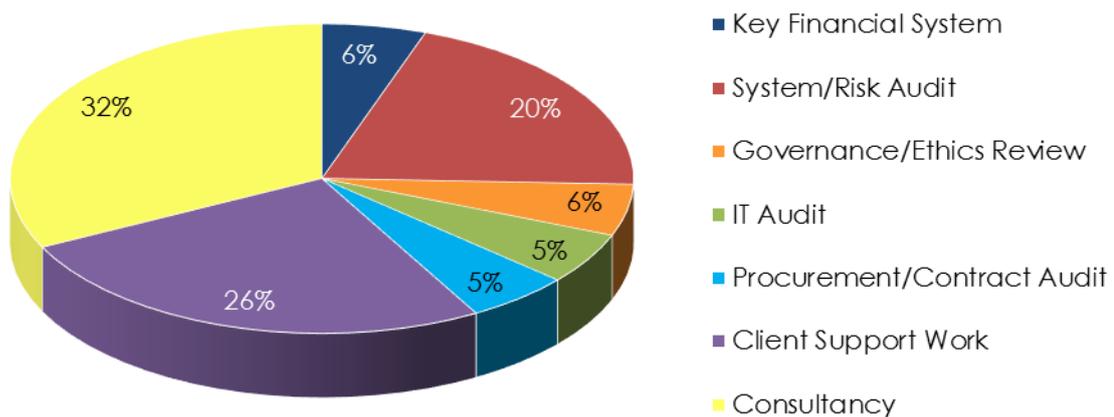
With all Derbyshire Council's entering into the transition phase for Local Government Reorganisation (LGR), It is considered prudent to set aside a generous contingency of audit plan time to consider and address any related issues and risks arising throughout 2026-27.

Our risk assessment of the Council's activities, in consultation with senior management, has concluded that the following audits will be undertaken in 2026-27:

Audit Plan Assignments	Risk Rating	Indicative Quarter
Key Financial Systems Reviews		
Cash Management System	Medium	Q3
Procurement/Contract Reviews		
Procurement (Contracts Register)	High	Q1/Q2
System/Risk Reviews		
Corporate Complaints	Medium	Q2/Q3
Health & Safety	Medium	Q2
Housing Regulation (Consumer Standards)	High	Q3/Q4
Emergency Planning	High	Q2
Governance/Ethics Reviews		
Anti-Fraud & Corruption	Medium	Q3
Consultancy		
Local Government Reorganisation Contingency	High	Q1- Q4
IT Audit Reviews		
IT Infrastructure/Applications	High	Q3

The detailed scopes of each audit assignment will be agreed with the relevant managers nearer the commencement of the audit. The cost of the Internal Audit Service for 2026-27 is estimated to be £156,737.

Audit Plan 2026-27 per Type of Audit



Appendix B - Internal Audit Charter

Purpose & Mission

The purpose of Nuneaton & Bedworth Borough Council's internal audit service is to provide independent, objective assurance and consulting services designed to add value and improve the Council's operations. The mission of internal audit is to enhance and protect organisational value by providing risk-based and objective assurance, advice, and insight. The internal audit service helps the Council accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of governance, risk management, and control processes.

Role of Internal Audit

The role of the Internal Audit Service includes:

- Supporting the delivery of the Council's strategic objectives by providing risk-based and objective assurance on the adequacy and effectiveness of governance, risk management and internal controls.
- Championing good practice in governance through assurance, advice and contributing to the Council's annual governance review.
- Advising on governance, risk management and internal control arrangements for major projects, programmes and system changes.
- Governance oversight of the Council's collaborative and arm's-length arrangements.

Nuneaton & Bedworth Borough Council's Internal Audit Service is provided by the Central Midlands Audit Partnership (CMAP). Derby City Council acts as the host authority for CMAP.

CMAP's Internal Audit Service is most effective when:

- a) Internal auditing is performed by competent professionals in conformance with Internal Audit Standards, which are set in the public interest.
- b) The Internal Audit Service is independently positioned with direct accountability to the Council's Leadership Team and its Audit & Standards Committee.
- c) Internal auditors are free from undue influence and committed to making objective assessments.

Commitment to Adhering to the Global Internal Audit Standards in the UK Public Sector

CMAP will adhere to the mandatory elements of The Institute of Internal Auditors' International Professional Practices Framework, which are the Global Internal Audit Standards. This will take into account:

- a) the CIPFA Application Note, which provides a framework for the practice of internal audit in the UK public sector when taken together with the Global Internal Audit Standards;
- and
- b) the CIPFA Code of Practice for the Governance of Internal Audit in UK Local Government, which complements the Global Internal Audit Standards from the perspective of the "Head of Internal Audit". Overall, this means that the Internal Audit Service will adhere to the "Global Internal Audit Standards in the UK Public Sector".

The Chief Audit Executive will report periodically to Leadership Team and the Audit & Standards Committee regarding CMAP's conformance with the Standards, Application Note, and CIPFA Code, which will be assessed through a quality assurance and improvement programme.

Authority – Internal Audit Mandate

The mandate for CMAP's provision of the internal audit service is found in two pieces of legislation:

[Section 151 of the Local Government Act 1972](#)

requires that authorities 'make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs'.

The Financial Regulations (Constitution part 4 – Financial Regulations) state that the Chief Financial (s151) Officer has this responsibility ('establishing an adequate and effective system of internal audit').

[The Accounts and Audit Regulations 2015](#)

Part 2: Internal Control, Section 5: Internal Audit requires that a relevant authority must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.

Any officer or member of a relevant body must, if required to do so for the purposes of internal audit –

- a) make available such documents and records; and
- b) supply such information and explanation.

as are considered necessary by those conducting the internal audit.

In this regulation "documents and records" includes information recorded in an electronic form.

The Internal Audit Service's authority is created by its direct reporting relationship to the Leadership Team and the Audit & Standards Committee. Such authority allows for unrestricted access.

The Leadership Team and Audit & Standards Committee authorises the Internal Audit Service to:

- a) Have full and unrestricted access to all functions, data, records, information, physical property, and personnel that it considers necessary to fulfil its responsibilities. Internal auditors are accountable for confidentiality and safeguarding records and information.
- b) Allocate resources, set frequencies, select subjects, determine scopes of work, apply techniques, and issue communications to accomplish the function's objectives.
- c) Obtain assistance from specialised services from within or outside Nuneaton & Bedworth Borough Council to complete internal audit services.

Internal Audit will be appropriately staffed in terms of numbers, qualification levels and experience. The Chief Audit Executive will report on the adequacy of resources to the Council's s151 Officer and to the Audit & Standards Committee.

Independence, Organisational Position, and Reporting Relationships

The Chief Audit Executive will ensure that the internal audit service remains free from all conditions that threaten the ability of internal auditors to carry out their responsibilities in an unbiased manner, including matters of audit selection, scope, procedures, frequency, timing, and report content. If the Chief Audit Executive determines that independence or objectivity may be impaired in fact or appearance, the details of impairment will be disclosed to appropriate parties.

The Audit & Standards Committee authorises the internal audit service to:

- Have full, free, and unrestricted access to all functions, records, property, and personnel pertinent to carrying out any engagement, subject to accountability for confidentiality and safeguarding of records and information.
- Allocate resources, set frequencies, select subjects, determine scopes of work, apply techniques required to accomplish audit objectives, and issue reports.
- Obtain assistance from the necessary personnel of the Council, as well as other specialised services from within or outside the Council, in order to complete the engagement.

Independence & Objectivity

Internal auditors will maintain an unbiased mental attitude that allows them to perform engagements objectively and in such a manner that they believe in their work product, that no quality compromises are made, and that they do not subordinate their judgment on audit matters to others.

Internal auditors will have no direct operational responsibility or authority over any of the activities audited. Accordingly, internal auditors will not implement internal

controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair their judgment, including:

- Assessing specific operations for which they had responsibility within the previous year.
- Performing any operational duties for the organisation or its affiliates.
- Initiating or approving transactions external to the internal audit service.
- Directing the activities of any organisation employee not employed by the internal audit service, except to the extent that such employees have been appropriately assigned to auditing teams or to otherwise assist internal auditors.

Where the Chief Audit Executive has or is expected to have roles and/or responsibilities that fall outside of internal auditing, safeguards will be established to limit impairments to independence or objectivity.

Internal auditors will:

- Disclose any impairment of independence or objectivity, in fact or appearance, to appropriate parties.
- Exhibit professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined.
- Make balanced assessments of all available and relevant facts and circumstances.
- Take necessary precautions to avoid being unduly influenced by their own interests or by others in forming judgments.

The Chief Audit Executive will confirm to the Audit & Standards Committee, at least annually, the organisational independence of the internal audit service.

The Chief Audit Executive will disclose to the Audit & Standards Committee any interference and related implications in determining the scope of internal auditing, performing work, and/or communicating results.

[Organisational Position and Reporting Relationships](#)

The Chief Audit Executive will report functionally to the Audit & Standards Committee and administratively (i.e., day-to-day operations) to the Council's s151 Officer.

In order to establish, maintain, and assure that the Council's internal audit service has sufficient authority to fulfil its duties, the Audit & Standards Committee will:

- Approve the internal audit service's charter and mandate.
- Approve the risk-based internal audit plan.
- Receive communications from the Chief Audit Executive on the internal audit service's performance relative to its plan and other matters.
- Make appropriate inquiries of management and the Chief Audit Executive to determine whether there is inappropriate scope or resource limitations.

- The Chief Audit Executive will have unrestricted access to, and communicate and interact directly with, the Audit & Standards Committee, including in private meetings without management present.

The Chief Audit Executive will report periodically to senior management and the Audit & Standards Committee regarding:

- The internal audit service's purpose, authority, and responsibility.
- The internal audit service's plan and performance relative to its plan.
- The internal audit service's conformance with The Institute of Internal Auditors' (IIA) Code of Ethics and Standards, and action plans to address any significant conformance issues.
- Significant risk exposures and control issues, including fraud risks, governance issues, and other matters requiring the attention of, or requested by, the Audit & Standards Committee.
- Results of audit engagements or other activities.
- Resource requirements.
- Any response to risk by management that may be unacceptable to the organisation.

Scope of Internal Audit Activities

The scope of internal audit activities encompasses, but is not limited to, objective examinations of evidence for the purpose of providing independent assessments to the Audit & Standards Committee, management, and outside parties on the adequacy and effectiveness of governance, risk management, and control processes at the Council. Internal audit assessments include evaluating whether:

- Risks relating to the achievement of the Council's strategic objectives are appropriately identified and managed.
- The actions of the Council's employees and contractors are in compliance with its policies, procedures, and applicable laws, regulations, and governance standards.
- The results of operations or programs are consistent with established goals and objectives.
- Operations or programs are being carried out effectively and efficiently.
- Established processes and systems enable compliance with the policies, procedures, laws, and regulations that could significantly impact the organisation.
- Information and the means used to identify, measure, analyse, classify, and report such information are reliable and have integrity.
- Resources and assets are acquired economically, used efficiently, and protected adequately.

The Chief Audit Executive coordinates activities, where possible, and considers relying upon the work of other internal and external assurance and consulting service providers as needed. The internal audit service may perform advisory and related client service activities, the nature and scope of which will be agreed with the client, provided the internal audit service does not assume management responsibility.

Opportunities for improving the efficiency of governance, risk management, and control processes may be identified during engagements. These opportunities will be communicated to the appropriate level of management.

Responsibility of Chief Audit Executive

The Chief Audit Executive has the responsibility to:

- Submit to the Audit & Standards Committee, a risk-based internal audit plan for review and approval.
- Communicate to senior management and the Audit & Standards Committee the impact of resource limitations on the internal audit plan.
- Review and adjust the internal audit plan, as necessary, in response to changes in the organisation's business, risks, operations, programmes, systems, and controls.
- Communicate to senior management and the Audit & Standards Committee any significant interim changes to the internal audit plan.
- Ensure each engagement of the internal audit plan is executed, including the establishment of objectives and scope, the assignment of appropriate and adequately supervised resources, the documentation of work programs and testing results, and the communication of engagement results with applicable conclusions and recommendations to appropriate parties.
- Follow up on engagement findings and corrective actions, and report periodically to senior management and the Audit & Standards Committee any corrective actions not effectively implemented.
- Ensure the principles of integrity, objectivity, confidentiality, and competency are applied and upheld.
- Ensure the internal audit service collectively possesses or obtains the knowledge, skills, and other competencies needed to meet the requirements of the internal audit charter.
- Ensure trends and emerging issues that could impact the organisation are considered and communicated to senior management and the Audit & Standards Committee as appropriate.
- Ensure emerging trends and successful practices in internal auditing are considered.
- Establish and ensure adherence to policies and procedures designed to guide the internal audit service.



- Ensure adherence to the organisation's relevant policies and procedures, unless such policies and procedures conflict with the internal audit charter. Any such conflicts will be resolved or otherwise communicated to senior management and the Audit & Standards Committee.
- Ensure conformance of the internal audit service with the Standards, with the following qualifications:
 - If the internal audit service is prohibited by law or regulation from conformance with certain parts of the Standards, the Chief Audit Executive will ensure appropriate disclosures and will ensure conformance with all other parts of the Standards.
 - When the Standards are used in conjunction with requirements issued by the Chartered Institute of Public Finance and Accountancy (CIPFA), the Chief Audit Executive will ensure that the internal audit service conforms with the Standards, even if the internal audit service also conforms with the additional requirements of CIPFA.

Quality Assurance & Improvement Programme (QAIP)

The internal audit service will maintain a quality assurance and improvement programme that covers all aspects of the internal audit service. The program will include an evaluation of the internal audit service's conformance with the Standards and an evaluation of whether internal auditors apply The IIA's Code of Ethics. The program will also assess the efficiency and effectiveness of the internal audit service and identify opportunities for improvement.

The Chief Audit Executive will communicate to senior management and the Audit & Standards Committee on the internal audit service's quality assurance and improvement programme, including results of internal assessments (both on-going and periodic) and external assessments conducted at least once every five years by a qualified, independent assessor or assessment team from outside the organisation.



Central Midlands
Audit Partnership

AGENDA ITEM NO. 7

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Audit and Standards Committee

Date of Meeting: 17th March 2026

Subject: Internal Audit Progress Report

Portfolio: Not Applicable

Responsible Officer: Audit Manager

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Strive for transparency and
accountability, in all that we do.
Increase public scrutiny

Ward Relevance: All

Public or Private: Public

Forward Plan: Not applicable (not for Cabinet)

Subject to Call-in: Not applicable (not for Cabinet)

1. Purpose of report

- 1.1. To provide an update on progress against the approved Internal Audit Plan. This details the performance and activity of Internal Audit since the last Progress Report presented to this Committee.

2. Recommendations

- 2.1. That the report of the Audit Manager (Appendix 1) is considered, and any issues identified are subject to a follow-up report as appropriate

3. Background

- 3.1. The Audit & Standards Committee is responsible for:
 - scrutinising the activity of the Internal Audit service,
 - challenging the responses of management to recommended control improvement or lack of progress against agreed actions,
 - supporting improvements in governance, risk management and internal controls.
 - Ensuring Internal Audit remains independent, effective, and risk focused
4. Internal Audit Progress Report
 - 4.1. A report on the progress against the 2025/26 internal audit plan is attached at Appendix 1.
5. Consultation with the public, members, officers and associated stakeholders
 - 5.1. None directly related to this report.
6. Financial Implications
 - 6.1. None directly related to this report.
7. Legal Implications
 - 7.1. None directly related to this report.
8. Equalities implications
 - 8.1. Not applicable to this report.
9. Health implications
 - 9.1. Not applicable to this report.
10. Climate and environmental implications
 - 10.1. No direct climate and/or environmental implications have been identified.
11. Section 17 Crime and Disorder Implications
 - 11.1. Not applicable to this report.
12. Risk management implications

12.1. This Internal Audit Progress Report provides assurance on the adequacy and effectiveness of the Council's governance, risk management and control arrangements. The findings and recommendations arising from completed audits highlight areas where controls can be strengthened to better manage identified risks. Implementation of agreed actions will support continuous improvement in the Council's overall risk management framework.

13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Conclusion

14.1. This report demonstrates continued delivery of the approved Audit Plan and provides assurance that appropriate arrangements are in place to address identified risks and control weaknesses. The Audit & Standards Committee is invited to note the progress made, consider the outcomes of completed audits, and endorse the ongoing actions to strengthen the Council's governance, risk management and internal control environment.

15. Appendices

15.1. Please note the following appendix:
i. Appendix A – Internal Audit Progress Report

16. Background papers

16.1. Please note there are no background papers attached to this report.

17. Report Writer Details:

Officer Job Title: Audit Manager

Officer Name: Adrian Manifold



central midlands audit partnership

Nuneaton & Bedworth Borough Council – Audit Progress Report

Audit & Standards Committee: 17th March 2026



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Our Vision

To bring about improvements in the control, governance and risk management arrangements of our Partners by providing cost effective, high quality internal audit services.

Contacts

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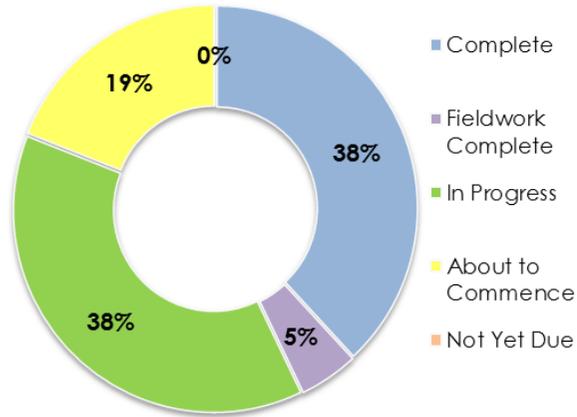
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Nuneaton & Bedworth Borough Council – Audit Progress Report

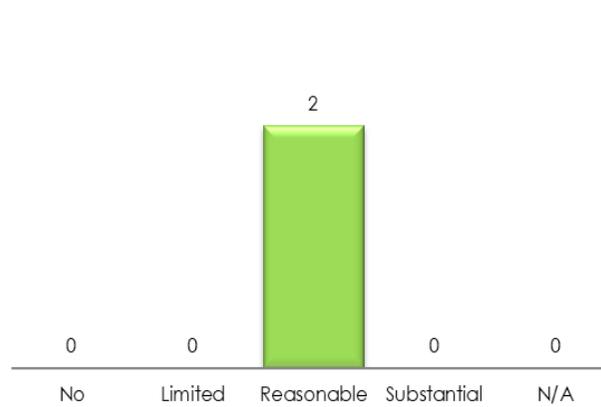
AUDIT DASHBOARD

Plan Progress



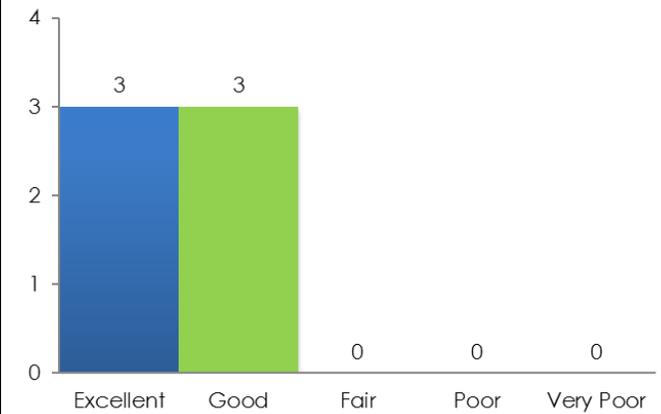
Jobs Completed in Period

Control Assurance Ratings During Period



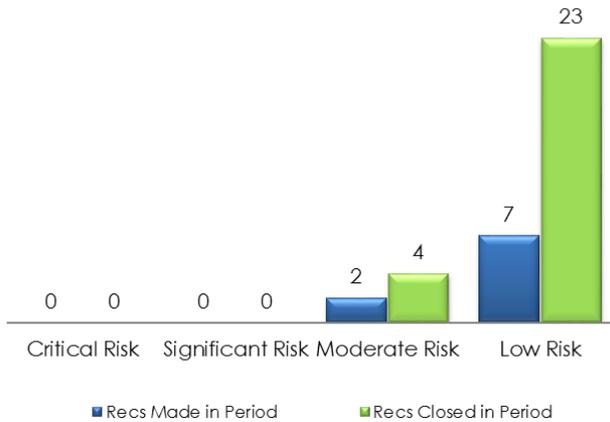
Customer Satisfaction

Overall Ratings - Feb 25 & Feb 26



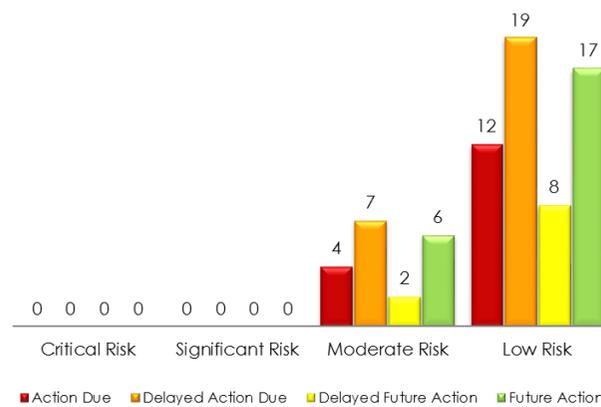
Recommendations Movement

Movement During Period



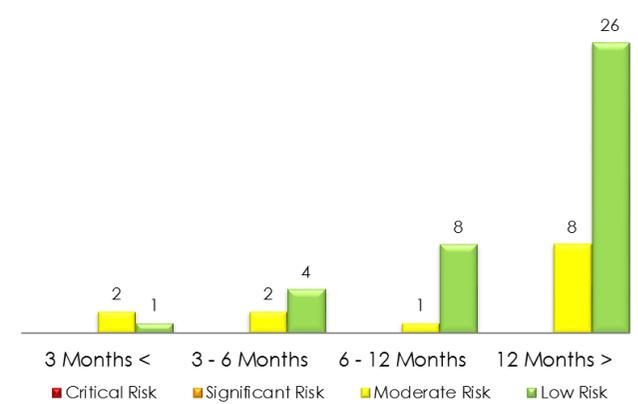
Recommendations Open

Recommendations Currently Open



Recommendations Overdue

Overdue Recommendations



Nuneaton & Bedworth Borough Council – Audit Progress Report

AUDIT PLAN

Progress on Audit Assignments

The following tables provide Audit & Standards Committee with information on how audit assignments were progressing as at 3rd March 2026.

2025-26 Assignments	Status	% Complete	Assurance Rating
Insurance	In Progress	25%	
Housing Benefit & Council Tax Support	Allocated	10%	
Business Change & Transformation	Final Report	100%	Reasonable
IT Infrastructure/Applications	In Progress	15%	
Procurement (Contracts Register)	Deferred		
Risk Management 2025-26	Final Report	100%	Reasonable
Corporate Governance 2025-26	Final Report	100%	Reasonable
Grant Certification 2025-26	In Progress	75%	
Markets & Street Trading	Allocated	15%	
Corporate Fire Risk Management	In Progress	70%	
Voids Management	In Progress	35%	
Capital Project Management	In Progress	20%	
Health & Safety	Deferred		
Waste Management	In Progress	35%	
Parks & Open Spaces	Allocated	0%	

B/Fwd Assignments	Status	% Complete	Assurance Rating
Corporate Credit Cards	Draft Report	95%	
Electoral Services	Final Report	100%	Substantial
Fire Risk Management	In Progress	70%	
Fuel Cards	In Progress	75%	
Licensing	Final Report	100%	Reasonable
Food Hygiene f/u	Final Report	100%	Reasonable
Grounds Maintenance	Final Report	100%	Reasonable
Homelessness	Final Report	100%	Reasonable

Plan Changes

There have been significant over-runs on some legacy audits which have led to the deferral of two 2025-26 audits; those being Procurement and Health & Safety. Both audits will be included in the 2026-27 Audit Plan.

Nuneaton & Bedworth Borough Council – Audit Progress Report

AUDIT COVERAGE

Completed Audit Assignments

Between 11th November 2025 and 3rd March 2026, the following audit assignments have been finalised.

Audit Assignments Completed in Period	Assurance Rating	Recommendations Made				% Recs Closed
		Critical Risk	Significant Risk	Moderate Risk	Low Risk	
Food Hygiene 2023-24	Reasonable			1	4	20%
Business Change & Transformation	Reasonable			1	3	0%

Food Hygiene 2023-24					
Control Objectives Examined	Controls Evaluated	Adequate Controls	Partial Controls	Weak Controls	
An annual Food Safety Service Plan has been devised by an appropriate Officer and approved at a suitably delegated officer level, detailing the measures that will be implemented to safeguard food and drink which is produced prepared or sold within the Borough.	1	1	0	0	
Inspections outlined in the FSA Covid-19 Local Authority Recovery Plan 'July 2021 to March 2023' had been carried out effectively	1	1	0	0	
New food establishments are registering with the Council, and they are being inspected within 28 days of the notification being received.	1	0	1	0	
The process for establishing the risk rating is appropriate and an effective food inspection programme has been developed and is being complied with.	1	0	1	0	
Notices are being issued to food establishments appropriately and are approved by an Authorised Officer.	1	0	1	0	
The enforcement process is effective and in accordance with the Corporate Enforcement policy.	1	0	1	0	

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Revisits, right to reply and appeals are effectively dealt within the timeframe set by the FSA.		1	0	1	0
Complaints raised by members of the public in relation to food hygiene issues and food establishments are dealt with efficiently and effectively.		1	0	1	0
Staff have completed a declaration of interest form or a nil return to disclose any personal conflict of interests linked to FBO's operating in the Borough.		1	0	0	1
TOTALS		9	2	6	1
Rec No.	Summary of Weakness	Risk Rating	Original Action Date	Action Status	Revised Action Date
1	There was no liaison or formal arrangement in place with the Revenues Billing Team to share intelligence on new businesses or change in proprietors for existing food establishments.	Low Risk	01/12/2025	Action Due	
2	The Council was not complying with required timeframes for acknowledging and inspecting new food business registrations, and was not monitoring or reporting overdue inspections, increasing the risk of non-compliance with FSA food law code of practice.	Low Risk	n/a	Risk Accepted	
3	There was a lack of internal performance metrics and senior management oversight for food safety inspections, resulting in minimum inspection frequencies not being met in seven out of ten cases reviewed.	Moderate Risk	01/04/2026	Future Action	
4	The central notices register had not been consistently maintained with important fields such as 'commencement date' and 'compliance date' missing or incomplete. In addition, the FLARE premises record lacked adequate documentation of decisions made and actions taken.	Low Risk	01/12/2025	Action Due	
5	The Food Enforcement Policy has never been ratified by a delegated senior officer or individual cabinet member. Additionally, the policy has not been made available for public access.	Low Risk	01/04/2026	Future Action	

<h2>Business Change & Transformation</h2>			<p>The Assurance Rating pie chart is divided into four segments: 'No' (red, approximately 15%), 'Limited' (yellow, approximately 35%), 'Reasonable' (green, approximately 35%), and 'Substantial' (blue, approximately 15%).</p>	
Control Objectives Examined	Controls Evaluated	Adequate Controls	Partial Controls	Weak Controls
The Council have a centralised approach for the delivery of Business Change and Transformation.	9	5	2	2

Nuneaton & Bedworth Borough Council – Audit Progress Report

Business Change and Transformation is driven by the Council's priorities in the corporate plan, risk registers and known service issues.		3	2	1	0
TOTALS		12	7	3	2
Rec No.	Summary of Weakness	Risk Rating	Original Action Date	Action Status	Revised Action Date
1	Though the Council had established a Transformation Working Group and Transformation Delivery Team, it lacked a dedicated transformation board to provide overarching governance for transformation at the Council.	Low Risk	31/10/2026	Future Action	
2	The Transformation Working Group had no formal terms of reference in place, though there was a scoping document supporting its creation in 2022. The Transformation Delivery Team also had no terms of reference, though its remit was detailed in the scoping/proposed restructure of the Central Operations function, approved by Management Team in March 2024.	Low Risk	30/04/2026	Future Action	
3	Whilst we acknowledge that the Council was developing its Transformation Strategy, it had not implemented a formal Business Change Plan to manage change projects.	Moderate Risk	31/10/2026	Future Action	
4	There was no clear link between the items on the Transformation Project Plan, the pipeline list of transformation projects, and the Council's Strategic or Operational Risk Registers.	Low Risk	31/10/2026	Future Action	

Nuneaton & Bedworth Borough Council – Audit Progress Report

RECOMMENDATION TRACKING

Final Report Date	Audit Assignments with Open Recommendations	Assurance Rating	Recommendations Open			
			Action Due	Delayed Action Due	Delayed Future Action	Future Action
13-Sep-21	Land Charges		2			
13-Sep-21	Street Naming & Numbering			1		
11-Feb-22	Cemeteries & Crematorium Income		2	1		
01-Mar-22	S106 Agreements			1		
09-Mar-22	CCTV			2		
08-Apr-22	Mobile Phones				3	
02-May-22	Emergency Planning				2	
29-Sep-22	Council Tax 2022-23				1	
16-Aug-23	Sports Development			1		
08-Sep-23	Human Resources Management			1	1	
28-Mar-24	HEART (Home Environment Assessment & Response Team)		1	1		
31-Mar-24	Payroll Follow-up			2	1	
12-Apr-24	Leaseholder Management 2023-24			1		
03-Jun-24	Economic Development 2023-24			4		
12-Jul-24	Absence Management 2023-24				2	
29-Jul-24	Car Park Income 2023-24			2		
22-Aug-24	Customer Feedback 2023-24			2		
06-Mar-25	Commercial Rental Income	Reasonable	1			1
06-Mar-25	Housing Rental Income 2023-24	Reasonable		5		1
11-Jun-25	Licensing	Reasonable	5	2		1
30-Jul-25	Grounds Maintenance 2023-24	Reasonable	1			3
14-Oct-25	Risk Management 2025-26	Reasonable	1			9
03-Nov-25	Corporate Governance 2025-26	Reasonable	1			2
14-Nov-25	Food Hygiene 2023-24	Reasonable	2			2
28-Nov-25	Business Change & Transformation	Reasonable				4
		TOTALS	16	26	10	23

Action Due = The agreed actions are due, but Internal Audit has been unable to ascertain any progress information from the responsible officer.

Delayed Action Due = The original action date has now passed and Internal Audit has obtained status update comments from the responsible officer and a revised action date. This revised action date has now passed, but Internal Audit has been unable to ascertain any progress information from the responsible officer.

Nuneaton & Bedworth Borough Council – Audit Progress Report

Delayed Future Action = The original action date has now passed and Internal Audit has obtained status update comments from the responsible officer and a revised action date which is in the future.

Future Action = The agreed actions are not yet due, so Internal Audit has not followed the matter up.

Audit Assignments with Recommendations Due	Action Due				Delayed Action Due				Delayed Future Action			
	Critical Risk	Significant Risk	Moderate Risk	Low Risk	Critical Risk	Significant Risk	Moderate Risk	Low Risk	Critical Risk	Significant Risk	Moderate Risk	Low Risk
Land Charges				2								
Street Naming & Numbering								1				
Cemeteries & Crematorium Income				2			1					
S106 Agreements								1				
CCTV								2				
Mobile Phones											1	2
Emergency Planning												2
Council Tax 2022-23												1
Sports Development								1				
Human Resources Management							1				1	
Home Environment Assessment & Response Team				1				1				
Payroll Follow-up								2				1
Leaseholder Management 2023-24								1				
Economic Development 2023-24							2	2				
Absence Management 2023-24												2
Car Park Income 2023-24							2					
Customer Feedback 2023-24								2				
Commercial Rental Income				1								
Housing Rental Income 2023-24							1	4				
Licensing			2	3				2				
Grounds Maintenance 2023-24				1								
Risk Management 2025-26			1									
Corporate Governance 2025-26			1									
Food Hygiene 2023-24				2								
TOTALS			4	12			7	19			2	8

Nuneaton & Bedworth Borough Council – Audit Progress Report

HIGHLIGHTED RECOMMENDATIONS

Critical, Significant or Moderate Risk Recommendations Past Original Action Date

The following moderate risk rated recommendations, that have not yet been implemented, are detailed for Committee's scrutiny.

Job Name	Cemeteries & Crematorium Income	Original Action Date	31/03/2023
Risk Rating	Moderate Risk	Revised Action Date	31/12/2025
Recommendation Number	8	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
<p>Lack of 2.5 years rent income for Crematorium valuing approximately £362.5k due lessee's Dignity Plc.</p> <p>The Council should be receiving market rent income from March 2020 onwards in line with the lease agreement though due to the COVID pandemic, there appears to be a delay on the formal valuation by the District Valuer. To enable Finance to account for an income reserve, the Head of Estates was requested to estimate a rent value, and this was confirmed as £145k per year back in 2021.</p> <p>Since then, there appears to be no progress made by Estates with Dignity to agree an interim rent sum, and the suggestion made by Finance to raise an invoice 'on account' for a larger value until such time as actual market rent value is determined has not been considered. At present, the Council are receiving a rent sum of £5k per annum (£1250 per quarter) based on the expired rent value, so there is a annual shortfall of approximate £140k rental income.</p>	<p>The Head of Estates to respond urgently on this unresolved matter to either formally claim the rent income due or enable Finance to make the appropriate provisions in the account.</p>	<p>Agreed</p>	<p>This is currently with the District Valuer who are looking to arrange a meeting with the other side this month, the issue they have had is providing evidence to support a valuation. Hopefully the meeting will help progress the situation and we will continue to chase.</p>

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Job Name	Mobile Phones	Original Action Date	01/09/2022
Risk Rating	Moderate Risk	Revised Action Date	31/03/2026
Recommendation Number	2	Recommendation Status	Delayed Future Action
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
There was no monitoring process in place over the mobile phone usage as call usage reports have not been provided to Line Managers for scrutiny/review. Therefore, any unusual/high spend would not be picked up during the budget monitoring process. However, audit review of the itemised call reports identified three staff where usage had incurred additional call charges. Further scrutiny highlighted the following two staff where calls were inappropriate as these were made to enter a personal cash win competition.	The mobile phone bills should be regularly reviewed/scrutinised for any unusual spend/costs incurred, and relevant staff should be reminded on the need to ensure that the Council's policy is adhered to, and appropriate action taken to address improper use.	A chaser email had been sent to Virgin regarding the monitoring and exception reports, however no response has been received. A further follow up email is due to be sent.	New contract in place with BT for provision of the EE sims from 11 April 2024 - 10th April 2026. In process of setting up reporting and exception reporting to provide analysis required. Each connection is allocated to a person, but we don't currently have any information within the portal which allocates each of those people/connections to a particular team, so I think we would need to do a piece of work to set up an appropriate structure within the portal that will then allow us to group the connections into departments/teams. We can then send that information to the relevant managers for scrutiny.

Job Name	Human Resources Management	Original Action Date	12/12/2024
Risk Rating	Moderate Risk	Revised Action Date	30/04/2026
Recommendation Number	1	Recommendation Status	Delayed Future Action
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The Council is in the process of developing a People Strategy (PS), though the target date for implementation for 1 June 22 as now passed. This strategy is essential in ensuring that the Council can attract and retain a talented, and experienced workforce with the essential skill needs for the future. Several work streams have been established which focus on four key areas (Employee engagement and wellbeing; Leadership Development; Develop Talent and Promote an inclusive work environment- make the Council an employer of choice). The results from the workstreams will be used to feed into the development of the PS. Once implemented the PS will then inform the direction of HR policies and procedures, to ensure that agreed principles are included and embedded.	A formal work programme is established for the development and implementation of the PS, with completion target dates for each workstream to help focus attention and assist in monitoring progress. The progress of the PS development should be reported regularly to Management Team and Employment Committee (EC).	Agreed	People strategy is being written for submission to OSP/Cabinet in September 2025, and adoption in April 2026. The previous People Strategy was not adopted by previous administration.

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Job Name	Human Resources Management	Original Action Date	12/12/2024
Risk Rating	Moderate Risk	Revised Action Date	30/09/2025
Recommendation Number	14	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
<p>Recruitment and Retention (R&R) generally forms part of the organisation’s strategic management of human resources, which has a number of interrelated elements designed to deliver long term sustainable success.</p> <p>People issues are not featured in the Council’s Strategic Risk Register (SRR). A review of the Operation Risk Register (ORR) showed that two HR related risks were added on to the former Customer, Revenues and Assurance ORR (Aug 21), however, this document has not been updated following the Oct 21 management restructure.</p> <p>Consequently, employee morale and staff retention could be significantly impacted if HR-specific risks are not fully identified, effectively monitored and or managed.</p>	<p>The management needs to ensure that potentially high-impact and high-likelihood HR risks (for example, ‘Not having the right people in the right place at the right time’, ‘multiple vacancies in key positions of the Council’; ‘employing staff who do not have the required competencies and/or cultural fit with the Council etc.) are identified, mitigated and effectively managed and monitored.</p>	<p>Agreed</p>	<p>Under review as part of the Strategic Workforce Planning.</p>

Job Name	Economic Development 2023-24	Original Action Date	31/12/2024
Risk Rating	Moderate Risk	Revised Action Date	30/10/2025
Recommendation Number	1	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
<p>The Council’s Economic Development Strategy (EDS) and Action Plan (AP) was adopted in 2016, which provides a framework for the delivery of the Council’s ED priorities. The timeframe for the EDS is to 2031, to align with the then Borough Plan (BP) and Corporate Plan (CP), with a comprehensive review due in 2021. The EDS and AP was reviewed and re-drafted by the interim Economic Development Manager (EDM) in 2021/22, however, to date, the updated EDS and AP has not been finalised and approved. Given the length of</p>	<p>The Council needs to ensure that it has an up to date, approved EDS and AP in place, that aligns with the Council’s BaBB and all relevant county-wide and sub-regional priorities, to provide a clear and strategic direction for ED.</p>		<p>Borough Plans to be approved by Cabinet in October 2025. Updated 2025 ED Strategy to be included to support Borough Plan submission. Action Plan being updated by the end of September.</p>

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time that has passed it is highly likely that the revised draft EDS and AP is now out of date, as some of the key policies used to inform its development; for example, the Warwickshire Education Strategy (WES) 2024-29 has now been refreshed and the new county-wide Warwickshire Strategic Economic Plan (SEP) 2024 – 34 is now in place and effective from 1 May 24.			
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Job Name	Economic Development 2023-24	Original Action Date	31/12/2024
Risk Rating	Moderate Risk	Revised Action Date	30/09/2025
Recommendation Number	2	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The progress of the EDS Action Plan 2016 was required to be reported annually to the Economic and Corporate (EC) Overview and Scrutiny Panel (OSP), until it became defunct in 2017/18. This responsibility was then transferred to the Business, Regulation and Planning (BRP) OSP; however, we have not been able to locate any progress reports either to the BRP-OSP or Management Team (MT), though we understand that there were ED activities undertaken in the past four years, until responsibility for the function was assigned to the Housing and Community Safety (HCS) team from 1 April 22.	An effective monitoring, tracking, and reporting mechanism for the EDS AP activities should be established and the arrangement clearly specified within the updated EDS.		2025 updated Strategy to be amended to include mechanism for effective monitoring, tracking, and reporting Action Plan being updated complete by end of September 2025.

Job Name	Car Park Income 2023-24	Original Action Date	12/12/2024
Risk Rating	Moderate Risk	Revised Action Date	30/09/2025
Recommendation Number	3	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
Our findings showed that the income reconciliation of online payments relating to season tickets and PCN's is undertaken regularly by the Parking team, using the daily card transactions (world-pay) report sent by CS, to manually update the records within Chipside. However, the season ticket and	Reconciliation of the PCN and Season ticket income between Chipside and Agresso should be completed on a regular basis, independently of the Parking team. If feasible, to facilitate the reconciliation process, the PCN and season ticket or car registration numbers (as detailed in the customer ID section on the	Agreed	To implement a quarterly reconciliation using Car Parking reports and cash posted transactions in Agresso starting from 2025-26 onwards. Audit to be advised when the 1 st quarter reconciliation has been completed.

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penalty charge notice income due and received is not being reconciled to the income posted on Agresso; therefore, there is a risk of all income due not being collected and correctly accounted for.	world-pay statement) should be recorded in the text field, or PO field when posting income into Mentec/Agresso.		
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Job Name	Car Park Income 2023-24	Original Action Date	28/11/2024
Risk Rating	Moderate Risk	Revised Action Date	30/09/2025
Recommendation Number	6	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The penalty charge notice debts returned by the bailiffs as uncollectable were marked as 'written off' after either the Town Centre Manager or Assistant Director had signed and returned the 'Debts Unable to Collect' form to the Parking team. However, this is in breach of the Procedure Rule's as neither of them have the delegated authority to approve write-offs.	A formal decision is obtained from the Assistant Director - Finance, allowing the SM – TCM and AD - E to authorise write-offs and a copy of the delegated authority form is sent to Legal Services for retention on the central delegated decisions folder.	Agreed	In liaison with the Assistant Director for Economy and Regeneration to sort out the process

Job Name	Licensing	Original Action Date	31/10/2025
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	8	Recommendation Status	Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
There were no reconciliations being performed between the income received in the General Ledger (Agresso) and the number of live/active licences on Flare.	We recommend that regular reconciliation between the number of live licences in Flare to the invoices in the Civica Debtor system is undertaken, and appropriate action taken where gaps are identified.	The Licensing Team Leader will run reports periodically from Flare and Civica and reconcile the two resources, to identify any gaps and take action as appropriate.	

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Job Name	Licensing	Original Action Date	31/10/2025
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	9	Recommendation Status	Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The Licensing fees have not been reviewed/updated since 2019-20. A review of the Licensing budget showed the function was in budget deficit in the past three years, which could indicate that full cost recovery was not being achieved.	We recommend that the Licensing fees should be reviewed at regular intervals to ensure full cost recovery is being achieved and compliance with the relevant fees regulations.	Environmental Health and Licensing Manager, and Licensing Team Leader The fee review process is scheduled to commence this year, and a 1st draft document to be ready for presenting to the relevant body by October 25.	

Job Name	Housing Rental Income 2023-24	Original Action Date	01/09/2025
Risk Rating	Moderate Risk	Revised Action Date	01/12/2025
Recommendation Number	3	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The monthly reconciliation of housing rents to the General Ledger are ineffective as the financial data is not being matched from two independent sources of data.	We recommend that a valid rent reconciliation is performed monthly using income reports extracted from two separate independent sources i.e. General Ledger (Agresso) and Housing rent system (CX). Also, a reconciliation statement is prepared on completion to verify the balancing with narrative for any discrepancies investigated and resolved. The document is countersigned, and the final record is saved as a PDF.	This is something that was historically done but due to capacity has fell by the waste side. This needs to be re-introduced but whether this is monthly or quarterly basis may differ.	The level of debtors and creditors are currently being investigated to understand the difference between CX information and Agresso. Once this has been completed a monthly reconciliation will be re-instated.

Job Name	Risk Management 2025-26	Original Action Date	01/01/2026
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	2	Recommendation Status	Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
There is a lack of clarity and testing concerning the controls and the linked documents of assurance.	We recommend that the system of risk review currently in place should extend to also consider the controls and the assurance documentation. Documentation should be updated to include the dates of verification and the individuals responsible for the review.	Sources of assurance to be sampled (not all but a proportion) when undertaking the quarterly reviews. This would include either documentation evidence, evidence via a screenshot and/or an email to be saved and stored centrally (either network file or Content Manger/SharePoint).	

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Low Risk Recommendations Over 36 Months Past Original Action Date

The following 12 low risk rated recommendations, that have not yet been implemented and have exceeded their original action date by more than 36 months, are also detailed for Committee's scrutiny.

Job Name	Land Charges	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	
Recommendation Number	6	Recommendation Status	Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The LCC Service has been making a substantial surplus annually in the last three years (and for a number of years prior to that). This is clearly in breach of the Local Authorities (England) (Charges for Property Searches) Regulations 2008 and the Local Government Property Search Services – Costing and Charging Guidance 2009. Regulation 6 (3), states that 'A local authority must take all reasonable steps to ensure that over the course of any period of three consecutive financial years, the total income (including notional income from internal transactions) from such charges and recharges does not exceed the total costs of granting access to property records.'	The budget should be monitored, and fees and charges adjusted as appropriate, to ensure compliance with the regulations.	Agreed	A time cost analysis should be completed when the transition to HMLR has taken place.

Job Name	Land Charges	Original Action Date	31/03/2021
Risk Rating	Low Risk	Revised Action Date	
Recommendation Number	7	Recommendation Status	Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
Section 9, of the Statutory Instrument 2008 No. 3248 (of the above regulations) requires the Council to publish annually its LLC financial statement for the previous year and estimates used to calculate the LLC Fees for the current financial year. However, the Council has not published this information since the Regulations came into force in 2010.	The LLC financial statement and estimates required under Section 9 of the Local Authorities (England) (Charges for Property Searches) Regulations 2008 should be published annually. An appropriate mechanism should be put in place to ensure that the relevant information is published annually.	Agreed	Will work with the Finance Business Partner to see what can be resolved.

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Job Name	S106 Agreements	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	30/09/2025
Recommendation Number	5	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
There were no written procedures available to assist the relevant staff (especially new starters) involved in the monitoring of s106 agreements.	The procedures for the s106 monitoring system should be formally documented, stored in a central location, maintained up to date, and made available to the relevant staff involved in administering the system.	Agreed	Once the Section 106 Agreement Audit is concluded (August 2025) the Assistant Director for Planning is carrying out a review of how S106 Monitoring and Discharge of Conditions can best be resourced, which may well result in an additional post - this will be a sensible time to formally document all matters listed.

Job Name	CCTV	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	31/03/2023
Recommendation Number	2	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
In addition to the main Control Room CCTV scheme, the Council operates other peripheral systems, all owned by the Waste & Transport Services, which are not currently covered under NBBC CCTV Code of Practice and Procedures Manual. These are; (i) Smart cameras on Council refuse collection vehicles; (ii) Fly tipping cameras; and (iii) Body worn video (BWV) – externalised environmental enforcement service	The Council needs to ensure that all the CCTV systems it operates (internally or externally provided), are disclosed and covered by its CCTV Code of Practice (CoP).	Former Head of Town Centre (HTC) response. Fly-tipping and smart cameras on Council refuse collection vehicles are owned by the Waste & Transport service and do not feed into the Control Room. Therefore, they do not fall under the remit of the CCTV Controllers and do not need to be included in the CoP and PM for the Control Room. However, if they need to be included, then a separate CoP & PM specifically for the Waste & Transport Service is needed as the current CoP & PM relate to & reflect the Control Room only. Former Head of Waste & Transport (HWT)response. In process of liaising with HTC to include RCV camera and fly tipping protocols within the CP & PM. The document will then be issued to all authorised personnel with responsibility for Camera use or management.	By Former HTC Contact with HWT has not yet taking place due to current workload priority. It is proposed that once the CCTV system is finally upgraded, the whole service to be reviewed, with a view to bringing all the camera systems into a single service as a piece of work in 2023.

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Job Name	CCTV	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	31/03/2023
Recommendation Number	12	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The two stand-alone CCTV systems (Waste fleet and fly-tipping cameras) have no live viewing; i.e., the footage is not viewable and can only be accessed retrospectively by downloading the footage via the Wi-fi link at the Depot (Waste fleet), or by the Control Room operators (fly-tipping). There is no documented procedure for checking and maintaining the health of the stand-alone systems' equipment, to ensure that the cameras are working and recording and that the date and time programmed into equipment is correct. Poorly maintained cameras/equipment could lead to ineffective use of resources and unsuccessful litigation against the polluters/defence of claims against the Council.	The equipment health checks procedure should be specified within the CoP & PM to assist with effective operation and litigation process.	Fly-tipping and smart cameras on Council refuse collection vehicles are owned by the Waste & Transport service and do not feed into the Control Room. Therefore, they do not fall under the remit of the CCTV Controllers and do not need to be included in the CoP and PM for the Control Room. However, if they need to be included, then a separate CoP & PM specifically for the Waste & Transport Service is needed as the current CoP & PM relate to & reflect the Control Room only. Former Head of Waste & Transport (HWT) response. In process of liaising with HTC to include RCV camera and fly tipping protocols within the CP & PM. The document will then be issued to all authorised personnel with responsibility for Camera use or management.	By Former HTCC contact with HWT has not yet taking place due to current workload priority. It is proposed that once the CCTV system is finally upgraded, the whole service to be reviewed, with a view to bringing all the camera systems into a single service as a piece of work in 2023.

Job Name	Street Naming & Numbering	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	28/02/2023
Recommendation Number	3	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
A review of the SNN budget for the past five years shows that the service has generated a profit in the first four years, though for 2020/21 there was an under-recovery of costs of approximately £1.8k. The charges should not exceed the cost of providing the service, so the Council is in breach of the regulations.	The SNN income and expenditure should be regularly monitored, and fees and charges adjusted as appropriate to ensure compliance with the regulations.	Agreed	We will look to create an income reconciliation between the Flare and General Ledger systems. The SNN fees are in the process of being reviewed.

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Job Name	Mobile Phones	Original Action Date	01/09/2022
Risk Rating	Low Risk	Revised Action Date	31/03/2026
Recommendation Number	3	Recommendation Status	Delayed Future Action
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
The ICT Code of Conduct for Employees (ICCE) policy does not clearly outline those costs incurred due to inappropriate use will be recouped by the Council. Also, the policy has not been subject to review since 2017.	<p>The ICCE policy should be reviewed and updated as soon as possible.</p> <p>A clause regarding ‘the use of work phone for private use may incur the costs being recharged/recouped by the Council’ should be added to the policy, as this may deter/ reduce unreasonable usage, though it is appreciated that it may not be cost effective to implement for low value incidences.</p>	The ICT Client Manager will raise the review of the ICCE policy via Information Management Group.	A review was undertaken in 2024/25 and the number of mobile phones has been reduced significantly. Further work around the policy wording and requirements will be undertaken in 2025/26 financial year.

Job Name	Mobile Phones	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	31/03/2026
Recommendation Number	5	Recommendation Status	Delayed Future Action
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
Data usage has not been monitored by Service Managers as the expected usage reports from the provider has not been provided to them and ICT have overlooked sending a request/reminder to the Virgin/EE account manager to follow up reports. Audit’s analysis of paid invoices confirmed that billing is accurate, however due to high data usage the monthly charge per connection has been increasing every quarter since May 21 from £3.00 per month to currently £4.50 per month (excluding the £1.00 line rental).	The mobile phone bills should be regularly reviewed/ scrutinised for any unusual spend/costs incurred, and relevant staff should be reminded on the need to ensure that the Council’s policy is adhered to, and appropriate action taken to address improper use.	chaser email had been sent to Virgin regarding the monitoring and exception reports, however no response has been received. A further follow up email is due to be sent.	A review was undertaken in 2024/25 and the number of mobile phones has been reduced significantly. Further work around the policy wording and requirements will be undertaken in 2025/26 financial year.

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Job Name	Council Tax 2022-23	Original Action Date	31/12/2022
Risk Rating	Low Risk	Revised Action Date	30/09/2026
Recommendation Number	3	Recommendation Status	Delayed Future Action
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
Discounts, disregards, and exemptions appear to have been only reviewed where a change in circumstances notification has been received. With the exception of single person discounts which have been reviewed up to 2020/21 as part of the annual National Fraud Initiative (NFI) data matching exercise, a full review of discounts, disregards and exemptions did not appear to have been undertaken for some time.	It is acknowledged that in the last two years, the Team's priority has been given to ensuring that the various covid-19 government grants were distributed to the community/ businesses on time. However, formal review of discounts, disregards, and exemptions should be scheduled to ensure that relevant accounts are still eligible.	Timetable of reviews for discount disregard and exemption classes has been produced by/for Visiting Officers to mainly complete. An evaluation is currently ongoing as to the best method of reviewing SPD's	Resources on the Billing team over the last couple of years have not been sufficient to take on a full SPD review, meaning we would have to appoint an external company to carry out this work. The alternative that I am looking at is to introduce a continuous rolling SPD review for example 100 a month and this is then factored into the daily work. Changes on the team over the last few months have meant that with recruitment and training we have had not had enough trained staff to deal with the daily work alone but this situation has improved and therefore we can look to introduce a rolling SPD review but it won't be before the end of this financial year.

AGENDA ITEM NO. 8

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Audit and Standards Committee
Date of Meeting:	17 th March 2026
Subject:	Constitution Update – Report from Constitution Review Working Party
Portfolio:	Not Applicable
Responsible Officer:	Monitoring Officer
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Strive for transparency and accountability, in all that we do. Increase public scrutiny.
Ward Relevance:	Not Applicable
Public or Private:	Public
Forward Plan:	Not Applicable (not a Cabinet Decision)
Subject to Call-in:	Not Applicable (not a Cabinet Decision)

1. Purpose of report

- 1.1. To consider and approve the recommendations from the Constitution Review Working Party (CRWP) and recommend changes to the Constitution to Full Council related to Section 5D.7 of the Constitution and Part 3E.7(b) of the Scheme of Delegation for the Assistant Director for Planning.

2. Recommendations

- 2.1. it be recommended to Full Council that the Constitution be updated to;
- 2.1.1. Amend the Scheme of Delegation for the Assistant Director – Planning be updated to align with Section 5D.7 (as per 4.2.7 of the report); and

- 2.1.2. make amendments to Section 5D.7 of the Constitution (as per 4.3.3 of the report) be endorsed and approved.

3. Background

- 3.1. On the 20th January 2026 the Constitution Review Working Party (CRWP) met and considered items. Those agreed by CRWP have been contained in this report for consideration by the Audit and Standards Committee.

4. Body of report and reason for recommendations

- 4.1. The items which CRWP endorsed and are subject to this report include those outlined below and subject to debate and discussion. The Committee may agree with the recommendations set out in 2.1 of the report or, seek to make amendments and/or reject one of more recommendations under 2.1.

4.2. Amendments to the Scheme of Delegation for the Assistant Director – Planning

- 4.2.1. Section 5D.7 of Nuneaton and Bedworth Borough Council's Constitution relates to Development Proposals Submitted by Members and Officers and Development by the Council. Section 5D.7(a) outlines:

“all proposals by Members or Officers will be determined by the Planning Applications Committee, regardless of any Scheme of Delegation in force at the time.”

- 4.2.2. In contrast, Part 3E.7(b) of the Scheme of Delegation for the Assistant Director for Planning states an application will be determined by Planning Applications Committee where:

“the applicant is a member or an employee of the Development Control or Building Control Section.”

- 4.2.3. 5D.7 of the Constitution therefore takes precedence over the Scheme of Delegation at Part 3E.7 (b) of the Constitution, however the current risk lies with viewing the Scheme of Delegation at Part 3E.7 (b) of the Constitution in isolation, resulting in non-compliance with Part 5D.7 of the Constitution.
- 4.2.4. For the avoidance of doubt, advice was sought from the Planning Advisory Service and the key points of the advice are outlined below:

- 4.2.4.1. The PAS in its earlier document (Probity in Planning) sets out how officer/employee and member own planning applications are to be dealt with.
- 4.2.4.2. Development proposals submitted by councillors and officers, and council development Proposals submitted by serving and former councillors, officers and their close associates and relatives can easily give rise to suspicions of impropriety.
- 4.2.4.3. Proposals could be planning applications or local plan proposals. Such proposals must be handled in a way that gives no grounds for accusations of favouritism.
- 4.2.4.4. Any local planning protocol or code of good practice should address the following points in relation to proposals submitted by councillors and planning officers:
 - I. if they submit their own proposal to their authority they should play no part in its consideration.
 - II. a system should be devised to identify and manage such proposals.
 - III. the council's monitoring officer should be informed of such proposals.
 - IV. such proposals should be reported to the planning committee and not dealt with by officers under delegated powers.
- 4.2.4.5. There is likely to be a national standards for Planning applications from Officers and/or Elected Members. The Council currently awaits this guidance and will update elected members accordingly.
- 4.2.5. As for the Data Protection Act (DPA) 2018 and Planning and General Data Protection Regulations (GDPR), advice was sought and:
 - 4.2.5.1. The Openness of Local Government Bodies Regulations 2014 are designed to promote the transparency and accountability of local authorities. Keeping personal details for reasons not clearly understood would not be good practice and may warrant a complaint to the Information Commissioners Office.
 - 4.2.5.2. There could be legal difficulties if there was a material difference in how the Council processes the personal data of "internal applicants" to those of other applicants. This would also likely disregard general thrust of legislation (Town and Country Planning Act, GDPR, DPA, Openness of Local Government Bodies Regulations, Environmental Information Regulations, Freedom of Information legislation) for local government to be more transparent, which ties in with accountability.

- 4.2.5.3. There should be consistency in how the Council deals with privacy and personal details of the applicant whether the applicant is a Member/Officer or a private individual.
- 4.2.5.4. A privacy notice must be available on the website for applicants to understand at the outset how their personal data will be used by the Council. A privacy notice therefore explains what information will be published and where it will be published. The Council's privacy notice for Planning is available on the website: [Planning and building control | Privacy notice | Nuneaton and Bedworth Borough Council](#).
- 4.2.6. It is worth noting there is no reference to keeping details of the applicant confidential. That said, provisions will be put in place (or currently are in place) to:
 - 4.2.6.1. Make note in the Committee report to be considered that delegated powers may not be used based on the wording of 5D.7 of the Constitution and the Scheme of Delegation at Part 3E.7 (b) of the Constitution. The report itself should not disclose the reason why, other than stating it's not permissible for delegated authority as it meets one or more criteria to be considered at Planning Applications Committee;
 - 4.2.6.2. Give consideration to Officers of the Council having access to the Lone Worker app for personal safety;
 - 4.2.6.3. Allow the address of an elected member to be removed from Council website page or altered to the Town Hall address, on grounds of personal safety further to the correspondence to withhold details of councillors' sensitive interests and home addresses: letter to local authorities issued to Monitoring Officers ([Withholding details of councillors' sensitive interests and home addresses: letter to local authorities - GOV.UK](#)); and
 - 4.2.6.4. Explain to applicants from the outset how their personal data will be used by the Council by issuing a privacy notice. The Council's privacy notice for Planning is available on the website: [Planning and building control | Privacy notice | Nuneaton and Bedworth Borough Council](#).
- 4.2.7. It is therefore proposed to amend the Scheme of Delegation to align with Section 5D.7 of the Constitution for consistency and to reduce potential for error and underlying risk. Therefore, the proposed change to the Scheme of Delegation would read as follows:

3E.7 Assistant Director – Planning

b. To process and make decisions on all planning applications as defined in

Schedule 1 below except in any one of the following cases:

ix. The applicant is a Member or an *employee Officer* of the *Development Control or Building Control Section Council*.

4.3. Amendments to Section 5D.7 of the Constitution due to inconsistent terminology in relation to Development Proposal, Applications and Proposals

4.3.1. When review the matter addressed at 4.2 of the report, it highlighted that the use of the following terminology is not helpful and is widely used:

- I. Development Proposals;
- II. Applications; and
- III. Proposals,

Therefore, it would be beneficial to consolidate terminology to ensure clarity and consistency in section 5D.7.

4.3.2. It is proposed to consolidate terminology in 5D.7 as some matters do not require a planning judgment and therefore reporting to the Planning Applications Committee would not be best use of Officer and Member time. The Constitution in its current wording could be interpreted that matters submitted by a Member and/or an Officer such as a Certificate of Lawfulness of Existing Use or Development, Certificate of Lawfulness of Proposed Use or Development and/or a prior approval of a Large Home Extension would be required for Planning Applications Committee, yet this wouldn't be the expectation for members of the public. It is therefore proposed to amend the wording via Audit and Standards Committee for consideration before being recommended to Full Council for approval.

4.3.3. It is therefore proposed to amend Section 5D.7 of the Constitution to read as follows:

**5D.7 ~~DEVELOPMENT PROPOSALS PLANNING APPLICATIONS~~
SUBMITTED BY MEMBERS AND OFFICERS AND DEVELOPMENT BY
THE COUNCIL**

- a) All *proposals planning applications* by Members and Officers and all major *development proposals planning applications* (as defined in statistical returns to the Government) by the Council itself will be determined by Planning Applications Committee, regardless of any Scheme of Delegation in force at the time. A Member or an Officer who has submitted a planning application will take no part in the determination of that application or the decision-making process leading to the determination of that application.

- b) *Members and Officers who submit a planning application or who have an application submitted on their behalf shall notify the **Head of Development & Building Control Assistant Director – Planning or the Planning Manager (Development Control)** in their absence in writing of that submission.*
- c) *All personal **planning** applications by Members or Officers will be designated as such on the face of the agenda, including Officer's job titles.*
- d) *Members who act as agents for people pursuing a planning matter with the Council shall take no part in the processing or determination of that application.*
- e) *All applications submitted on behalf of the Council shall have both the officer name and their job title on the face of the agenda.*

4.3.4. For the avoidance of doubt, Officer as defined in the Constitution (1.6 of Part 1 – Summary and Explanation), refers to Council employees who give advice, implement decisions, and manage the day-to-day delivery of its services. Some officers have a specific duty to ensure that the Council acts within the law and uses its resources wisely.

5. Consultation with the public, members, officers and associated stakeholders

- 5.1. Consultation with the public has not been undertaken.
- 5.2. Consultation has taken place with Constitution Review Working Party on 20th January 2026. As part of that report, consultation had also taken place with the Planning Department, the Planning Advisory Service and the Legal Department.

6. Financial Implications

- 6.1. No direct financial implications have been identified.

7. Legal Implications

- 7.1. No direct legal implications have been identified. Please note the legal points raised in 4.2 and 4.3 of the report where applicable.

8. Equalities implications

- 8.1. A review has been undertaken and it has been identified that no assessment is required following consultation and liaison with the appropriate officer.

9. Health implications

9.1. No specific health implications have been identified.

10. Climate and environmental implications

10.1. No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1. No direct risk management implications have been identified. However, failing to agree recommendation 2.1.1. causes ambiguity given the difference in wording that currently exists in the Constitution between the Scheme of Delegation for the Assistant Director – Planning and Section 5D.7 of the Constitution. As such, it creates a risk that a matter could be missed or not issued to Committee for lawful decision in accordance with the Constitution when it should or vice versa.

13. Human resources implications

13.1. No direct human resource implications have been identified other than for personal safety matters. For Officers, planning applications are rare and it is proposed the officer would be given access to the Council's Lone Worker tool to allow a form of safety provision.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Not possible as Constitution Review Working Party have considered and recommended the recommendations set out at 2.1 of the report be considered by the Audit and Standards Committee. Furthermore, the risk remains as per 12.1 of the report.

15. Conclusion

15.1. The report includes the proposed amendments to the Constitution following a meeting of the Constitution Review Working Party held 20th January 2026. Subject to debate and discussion, the Committee may agree with the recommendations set out in 2.1 of the report or, seek to make amendments and/or reject one of more recommendations under 2.1.

16. Appendices

16.1. Please note there are no appendices to this report.

17. Background papers

17.1. Please note there are no background papers attached to this report.

18. Report Writer Details:

Officer Job Title: Assistant Director – Democracy and Governance (Monitoring Officer)

Officer Name: Matthew Wallbank

AGENDA ITEM NO. 9

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Audit and Standards Committee
Date of Meeting:	5 th March 2026
Subject:	Review and Update of the Mayoral Protocol
Portfolio:	Resources and Central Services
Responsible Officer:	Monitoring Officer
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Value for Money - Delivering services effectively and efficiently while ensuring value for money for our taxpayers. Transparency Strive for transparency and accountability, in all that we do. Increase public scrutiny.
Ward Relevance:	N/A
Public or Private:	Public
Forward Plan:	N/A
Subject to Call-in:	N/A

1. Purpose of report

- 1.1. To consider the proposed changes to the Office of Mayor and Deputy Mayor Protocol and recommend any additions and/or alterations.
- 1.2. Subject to 2.1 to recommend to Council the constitution be updated accordingly

2. Recommendations

- 2.1. The proposed changes to the Office of Mayor and Deputy Mayor Protocol be approved; and

- 2.2. Subject to 2.1 above, to recommend to Council that the constitution be updated accordingly
3. Background
 - 3.1. The Mayoral Protocol is to be reviewed every two years to consider any changing needs and demands of the roles.
 - 3.2. Since the last review a number of changes have taken place either organisationally, budgetary or externally to the Council.
 - 3.3. This report has been considered by the Constitution Review Working Party prior to being submitted to Audit and Standards Committee.
4. Body of report and reason for recommendations
 - 4.1. The last review took place in 2021 and therefore it is prudent to ensure that the Protocol is up to date and reflects the role. Several of the changes reflect internal organisational changes such as change in job roles or responsibilities. A few changes reflect the changing role of the Mayor and how the mayoralty functions operationally
 - 4.2. It is the view of the Officers that the provision of alcohol at civic events hosted by the Council is removed due to the financial challenges that the Council are facing. Provision for teas/coffees and soft drinks will continue.
 - 4.3. Currently the Protocol allows the provision of the installation of a home telephone and answering service. Due to the advancement of communication devices most members have the use of a mobile device, and members are allocated a telephone allowance to contribute to any costs therefore it is proposed that this is no longer required.
 - 4.4. Civic Album - There is no budget allocation for the provision of a Civic Album therefore if a Mayor wishes to have one this must come out of their Mayoral Allowance or at personal expense therefore this is recommended for removal.
 - 4.5. Civic Christmas Cards – In the last couple of years the Civic Christmas card has been sent electronically not only by Nuneaton and Bedworth Borough Council (NBBC) but by other civic offices in Warwickshire therefore an update to the constitution has been made to reflect this position.
 - 4.6. The wearing of the civic chains present a risk to the Mayor whilst attending engagements and the removal of the chauffeur (the Civic car and chauffeur were removed from the council budget and a

provision of £4500 was allocated to aid in any incurred transport costs as per 9A.3 of the constitution - Civic Events & Transport) means the Mayor could be attending alone at an event therefore it is important that the Mayor assesses the risk with the event and have an appointed person (this could be arranged with the event organiser) to accompany the Mayor whilst in attendance at the event.

- 4.7. The storage of the chains, whilst not in use, due to their high value needs to be in a secured area. The chains were secured overnight and weekends at the Town Hall however practicalities of attending functions especially in the evening and in the absence of a chauffeur has now meant that the Chains are often stored at the Mayor's residence overnight and/or weekends if the Mayor has engagements. To ensure the security of chains it is recommended that these are kept in a home safe and this is reflected in the changes at Appendix A.
- 4.8. Civic Christmas Card list – updated to remove organisations that no longer exist and to add the Honorary Alderman/Alderwomen and Honorary Freeman/Freewomen.
5. Consultation with the public, members, officers and associated stakeholders
 - 5.1. Consultation undertaken with Democratic and Election Services Manager and Assistant Director – Democracy and Governance
6. Financial Implications
 - 6.1. No additional costs implicated in this review but may present some financial savings.
7. Legal Implications
 - 7.1. N/A
8. Equalities implications
 - 8.1. No review required at this stage. The Protocol is expected to have a positive impact on the protected characteristics by raising awareness of the support that is available for current and future Mayors and defining when there might be a need for risk assessments for activities to ensure the safety of the Mayor and Mayoress/Consort and others in attendance.
9. Health implications
 - 9.1. N/A

10. Climate and environmental implications

10.1. No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1 There are some potential risks in respect of lone working at events and wearing a high value item - Civic Chains. A few to highlight would be the collecting and returning the chain to secure storage late at night or at home, parking arrangements in poorly lit and isolated areas, being taken ill while at an event. These risks will need to be managed by the Mayor attending the event and to discuss any concerns with the Mayoral Office. In respect of the chains, guidance will be followed in respect of any protocol given by the Council's insurers and as noted in Appendix A.

13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	The constitution requires the Mayoral Protocol to be reviewed every two years to ensure it reflects the needs of office
B		
C		

15. Conclusion

15.1. The Protocol of the Office of Mayor and Deputy Mayor are required to be reviewed every two years. In completing this review, it is addressing the needs and changing roles of the Mayoralty to ensure it is reflecting the expectations of the residents of the Borough in which it serves.

16. Appendices

16.1. Please note the following appendices:

- i. Appendix A – Protocol of the Office of Mayor and Deputy Mayor with tracked changes

17. Background papers

17.1 Please note there are no background papers attached to this report.

18. Report Writer Details:

Officer Job Title: Democratic Services Team Leader

Officer Name: Kelly Baxter

PART 9 – PROTOCOL FOR THE OFFICES OF THE MAYOR and DEPUTY MAYOR

9A.1 INTRODUCTION

The following extract is taken from 'The Role of the Civic Mayor in the 21st Century

“The Mayor, as First Citizen, has a unique, distinctive and increasingly important role to play in fostering socially inclusive and responsible communities.

Mayors are in a perfect position to communicate with all kinds of people - they can command the attention of their communities and, acting as a figurehead, enthuse and motivate people.”

These procedures have been developed as part of the Council's arrangements for managing the offices of the Mayor and Deputy Mayor of Nuneaton & Bedworth Borough Council. Non-compliance with these instructions may result in a breach of the Code of Conduct. Part 1 of the Member Code of Conduct requires the Mayor to:

“Exercise independent judgement and not compromise my position by placing myself under obligations to outside individuals or organisations who might seek to influence the way I perform my duties as a councillor. This includes not accepting gifts or hospitality which could give rise to a perception of influence over the way I perform my duties.

Behave in accordance with all my legal obligations, alongside any requirements contained within the Council's policies, protocols and procedures, including on the use of the Council's resources.

Always treat people with respect, including the organisations and the public I engage with, fellow members and those I work alongside.

Provide leadership through behaving in accordance with these principles when championing the interests of the community with other organisations as well as within this Council.”

This document contains details and information on Corporate, Civic, Ceremonial and other matters.

The year ahead will be challenging but, by adhering to these standing instructions, the year will be rewarding. These instructions also provide a framework for all of those people who support Mayoral activities during the year and in setting budgets.

Note: These procedures will be reviewed every two years to consider any changing needs and demands of the roles.

a) **Purpose**

The Mayor is the [King's Queen's](#) representative in the Borough after the [King/Queen](#) himself and the Lord Lieutenant. The Mayor is the ceremonial head of the Council and of the Borough. The Mayor acts as the Council's figurehead for the community and represents the Council on a number of outside bodies (as listed below). It is important that the aims and objectives of the Council's Corporate and Community Plans are reflected within those duties.

- Nuneaton Festival of Arts Committee

For his or her year of office the Mayor may wish to appoint a Mayor's Chaplain for Civic and ceremonial occasions and as such is encouraged to seek agreement from that individual at the earliest available opportunity.

It is a considerable honour to be Mayor - the post has a unique status in the Borough as its First Citizen. Although it is an honour, it also brings responsibilities. As First Citizen, the Mayor is expected to act at all times in an appropriate manner that commands respect. As Elected Members, the Mayor/Deputy Mayor shall, when on Civic duty, demonstrate neutrality in respect of politics and religious beliefs.

Given the Mayor's status as the First Citizen of the Borough, support is given both in officer and financial resources to adequately carry out the duties. However, it must be borne in mind that any expenditure comes from the public purse, which we are under an obligation to spend wisely and strictly in accordance with the duties of Mayor/Deputy Mayor.

b) **Mayoralty Support Framework**

The Mayor and Deputy Mayor are supported in all secretarial, administration and diary functions and the maintenance of the Mayor's Parlour and associated rooms by the Mayor's Office.

The Assistant Director – [Economy Recreation and Culture](#) is responsible for the planning and delivery of Civic Events.

9A.2 CORPORATE

a) Allowances/Expenses Paid Direct by the Council

The Council may pay the Mayor and Deputy Mayor such allowance as the Council thinks reasonable to meet the expenses of these offices. The allowance is not a salary, nor payment to replace lost salary, but for the Mayor and Deputy Mayor to use in connection with their office. This allowance is, however, taxable.

The allowances are paid in monthly instalments by direct debit into the account holder's nominated account in 12 equal payments over the Civic year. The first instalment will be paid at the start of each Civic year.

The level of allowances and expenditure on Mayoralty are set in the annual budget process and budgets for individual events will also be agreed at the beginning of the Civic year and identified for the Mayor.

The Council pays the following expenses direct:

- i. **Mayor Making** - The Council will provide a light buffet, teas/coffees and soft drinks. ~~In addition, a budget is allocated for the provision of wine and beer.~~ All administrative costs are met including the provision of small table decorations and printing.
- ii. **Civic Service or Carol Service** – Subject to the budget being available from the Civic Events & Transport Budget, the printing, advertising and light refreshments (floral arrangements by agreement) will be met by the Council.
- iii. **Palace Garden Party** - An allowance to cover refreshments and incidental costs (up to £100) before and after the Garden Party for all of the Mayor's party (maximum four, including the Mayor and Mayoress/Consort).
- iv. **Civic Dinner** – Subject to the budget being available from the Civic Events & Transport Budget, the Council will also meet the costs of one Civic Dinner. The cost of the food, drinks and venue shall not exceed the allocated event budget, but typically, the Civic Dinner hosts up to 46 guests.
- v. ~~Home~~ – ~~An answer phone can be provided at home if required during the Mayoral Year.~~
- vi. ~~Civic Album~~ – ~~A digital photo frame will be presented to the out-going Mayor in recognition of the hard work carried out by the Mayor over the year, and as a token of the Council's gratitude. The digital content will be compiled during the year by the Graphics Team in accordance with the budget set. Alternatively, the Mayor may request a digital photo book created and printed on-line, instead of the digital photo frame or a leather bound Civic photograph album, by personally contributing any additional cost if they so wish.~~

~~vii-vi.~~ **Incidental Hospitality** - See Section 9A.2.

~~viii-vii.~~ **Cleaning, Provision and Maintenance of the Civic Robes and Chains** - The Council will meet all the costs involved in the provision and maintenance of the Civic Robes and Chains. These are expensive items and should be treated with great care.

~~ix.~~ **Civic Christmas Cards** - The Council will send Christmas cards [via email \(or via post if no viable electronic means can be found\)](#) to all those on the Civic List which has been drawn up as attached in Appendix A, which will be reviewed on an annual basis. The selection of the image/artwork for the card is made by the Mayor. ~~The budget for the costs of the Civic Christmas Cards will be allocated each financial year.~~

~~viii.~~

In addition, the Council has provided a budget of ~~£5,000~~ £4500 to be used for the provision of a chauffeur driven hire car for the events as indicated in section 9A.3 a) under the heading Civic Events & Transport Subject to attendance at those events, the balance of the budget may be expended upon other Civic Transport & Events such as the Civic Dinner and/or Civic Service at the Mayor's discretion, subject to the budgetary limits. The arrangements for transport shall be agreed in advance as part of the weekly diary meeting referred to in d) iv below.

The Mayor may request additional copies of the Civic Christmas Card, for sending to people not on the Civic List. However additional print and postage costs shall be met by the Mayor out of personal allowances. The Mayor should liaise with the ~~Communications & Marketing Manager~~ [Communications Team Leader](#) to arrange for additional cards.

If there are enquiries about the allowances or expenses payable, please contact the ~~Committee Services & Member Support Officer~~ [Democratic and Election Services Management and/or](#) the Assistant Director – Democracy & Governance.

b) **Expenses Paid Privately by the Mayor**

The following expenses are not paid for by the Council:

- i. **Personal Photographs** - The Council pays for the official Civic photographs of the Mayor and of the Council, but the Mayor will be expected to pay for any extra prints required for private use.
- ii. **Wines and Spirits for the Mayor's Private Stock** - The Mayor has the facility of a lockable cupboard, refrigerator and kettle located in the Mayor's dressing room at the Town Hall. The purchase and issue of stock is for the Mayor to arrange.
- iii. **Private and Social Luncheons** and any drinks provided to Members after Council or other meetings.
- iv. **Refreshments for Private Receptions** in the Mayor's Parlour or .
- v. **Tickets for Other Events** organised by outside bodies, other Councils, and individuals including neighbouring Civic Heads.

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- vi. **The Purchase of Raffle Tickets** and the provision of prizes at events to which the Mayor is invited to attend or support.

The Mayor should budget for the above out of his or her Allowance.

c) **Hospitality**

It is appropriate for the Council, from time to time, to provide modest hospitality for its guests. These will sometimes, but not always, involve the Mayor or Deputy Mayor. This is quite distinct from any Mayor's personal hospitality. The following points are important:

- i. **Public Scrutiny** - Any hospitality provided from public funds should always stand up to public scrutiny.
- ii. **Certification** - Any expenditure on Civic hospitality is certified by the appropriate budget holder or their nominated representative. It is always wise to bear this in mind and consult with them in advance on any proposed use of hospitality over and above those listed below.
- iii. **Hospitality** - The Mayor shall not dispense hospitality gratuitously or without careful consideration. There are many routine visits to the Parlour and in these cases modest hospitality may be provided comprising of:
 1. ~~Daytime~~ Visits to the Parlour (up to 6.00pm): tea, coffee or soft drinks.
 2. ~~Evening Visits (from 6.00pm): red/white wine, lager/beer or soft drinks.~~
 - 3.2. It is custom and practice for the Mayor to give visitors to the Parlour the opportunity to sign the Visitor's Book.
 - 4.3. Duration of Parlour Visits should not extend beyond two hours and can be arranged Monday-Friday inclusively. Formal Parlour visits will not be held on Saturdays or Sundays, the only exceptions being Remembrance Sunday and Freedom of the Borough Parades. Other circumstances may arise and will be addressed on an individual basis.

Notes:

- Fire regulations mandate that the Parlour is not suitable to accommodate more than 40 occupants including the Mayor and Mayoress/Consort at any time.
- Formal Parlour Visits shall be arranged through the Mayor's Office. All applications for a Parlour visit or for the attendance of the Mayor should be received in writing a minimum of 14 working days prior to the proposed date.
- It should be noted that the Council's Health and Safety Policies are continually reviewed and that Policy changes may impact on the arrangements described within this document. In such circumstances, the approved health and

safety arrangements have primacy and take precedence over any arrangements described in this document.

iv. **Private Arrangements**

Entertaining relatives, personal friends, or political associates are essentially private arrangements for the Mayor, and Council stocks shall not be provided for such purposes.

d) **Support Services**

i. **Administration/Secretarial Support** - The Mayor's Office is responsible for all secretarial matters arising from the offices of the Mayor/Deputy Mayor and as such, the Mayor/Deputy Mayor shall deal directly with it on all matters relating to engagements, correspondence and diary bookings etc.

ii. **Verbal Invitations** - The Mayor/Deputy Mayor shall not, under any circumstances, accept verbal invitations. Verbal requests should be referred to the Mayor's Attendant who shall furnish the applicant with an invitation request/briefing form for completion. All invitations for the Mayor/Deputy Mayor's attendance at events must be made in writing to the Mayor's Office. The Mayor/Deputy Mayor shall not approach organisations or individuals directly - once again, this should be done only through the Mayor's Office.

iii. **Personal Commitments:** The Mayor/Deputy Mayor shall notify the Mayor's Office of any work and/or personal commitments which may affect attendance at any Civic events. This includes any annual holiday that is planned during the Civic year.

iv. **Diary Meetings:** All invitations and correspondence received in writing will be discussed with the Mayor at the formal weekly/[fortnightly](#) diary meetings scheduled to occur at an agreed time and day each week.

Note: At the close of each diary meeting, the Mayor will agree and commit to the day and time of the following week's meeting.

v. **Engagement Sheets** - To ensure efficient support to the Mayor/Deputy Mayor and to invite effective media interest, the Engagement sheets are issued to the Mayor/Deputy Mayor and the media on a weekly basis.

The Mayor's Office will be responsible for preparing the agreed two week engagement schedule indicating any special requirements (e.g. dress code or speeches which the Mayor/Deputy Mayor may be asked to make).

The schedule will be issued on a weekly basis confirming the arrangements for the coming week and include a draft for the following week (i.e. in two weeks' time) full copies of which are provided to both the Mayor and Deputy Mayor.

Apart from genuine emergencies and extenuating circumstances, it is understood and accepted that extra events will not be added to the coming week's schedule.

It is understood and accepted that once the Mayor or Deputy Mayor has agreed to attend a Civic function and their personal attendance has been confirmed formally in writing by the Mayor's Office, this engagement will be honoured. It is however accepted that occasionally extenuating circumstances may prevail.

- vi. **Appropriate Events** - In deciding whether to accept invitations, the Mayor shall always consider whether it is an appropriate event for the First Citizen of the Borough to attend.

Notes:

- The Mayor shall not decline any event on the grounds of personal political persuasion or any discriminatory grounds identified in the Council's Single Equalities Scheme.
- The Mayor should not attend in an official capacity any function, the purpose of which may be perceived as securing publicity or financial gain for any commercial venture. This could amount to the Mayor, as a Member, using his or her position to confer an advantage on another. Where there is an event involving a commercial enterprise that is considered significant, the Mayor shall attend, but appropriate restrictions on publicity will have to be agreed with the event organisers.

Subject to having the appropriate budget, the Mayor can accept any out of Borough invitations from:

- Lord-Lieutenant of Warwickshire
- High Sheriff of Warwickshire
- Chairman of Warwickshire County Council
- Chairman of Warwick District Council
- Chairman of Stratford on Avon District Council
- Lord Mayor of Coventry
- Mayor of Solihull
- Mayor of North Warwickshire
- Mayor of Rugby
- Mayor of Hinckley & Bosworth
- Warwick University
- Coventry University

The Mayor (or Mayor's representative) is also able to accept a number of invitations, within the parameters of the designated budget, to attend Charity fundraising events organised by the above Civic Heads though any expenses in the form of tickets, raffle prizes, etc, will be paid for from the Mayor's Personal Allowance.

The Mayor may also accept other appropriate within Borough invitations within the parameters of the Mayoralty budget, from organisations and individuals such as:-

- Local MP's
- Commanding Officer of 30th Signal Regiment
- North Warwickshire & Hinckley College
- King Edward VI College
- Educational, Youth and Community Organisations and establishments
- Religious and multicultural organisations

All invitations shall be discussed and agreed at the weekly [or fortnightly](#) diary meetings.

vii. **Routine Support:** There are well established procedures and practices by which the Mayor's Office will routinely deal with matters on behalf of the Mayor, and Deputy Mayor in particular:

1. **Incoming** post and Civic Inbox - acknowledged on the Mayor's and Deputy Mayor's behalf.
2. **Civic Diary** – Maintenance.
3. **Liaison** - Regular liaison with the Mayor, Deputy Mayor, Mace Bearer and Civic Events Team.
4. **Protocol** - Guidance to the Mayor and Deputy Mayor on any relevant matters.
5. **Speeches** - Background information for key note speeches, if requested by the Mayor, or Deputy Mayor, can be provided for the following:
 - George Eliot Fellowship Luncheon
 - Nuneaton Lions' Charter Dinner
 - Rotary Club of Arbury
 - Inner Wheel Luncheon.

Advice on other speeches can be obtained upon request.

viii. **Mail Protocol** - Neither the Mayor's nor Deputy Mayor's incoming nor outgoing mail will be seen by the Chief Executive. S/he shall need to be informed of any issues which the Mayor, Deputy Mayor, and/or the Mayor's Office and Civic Events Team feel should be

brought to his/her particular attention. The Mayor will see all incoming/outgoing correspondence or can agree a level of delegation to the Mayor's Office.

e) **Council Meetings**

~~It is usual for the Chief Executive to meet with the Mayor prior to each Council meeting, to discuss agenda matters.~~

It is customary for the Mayor, Deputy Mayor, Leader, Chief Executive, ~~Assistant Director – Democracy & Governance~~ Monitoring Officer (or their Deputy) and Chaplain (if appointed) to have tea in the Mayor's Parlour at about 5.00pm prior to the Council meeting.

Procedure and conduct of meetings are set out in the Council's Standing Orders. The Chief Executive and/or Monitoring Officer ~~Assistant Director – Democracy & Governance Regulation~~ will be available to advise.

f) **Working with the Media**

Local newspapers and radio will take a close interest in the Mayor's activities and engagements. The media will have good access to the Mayor and Deputy Mayor and may look for instant comments on Council policies or services, or on local/national/world events.

The Mayor or Deputy Mayor should avoid giving opinions on these matters and, if they wish to do so, they *shall obtain the agreement of the relevant Cabinet Member beforehand.*

The Council has adopted procedures for dealing with the media and these should be followed. The Communications Team Leader & Marketing Manager will be able to advise on any media issues.

Note:

Prior to their issue, all press releases issued on behalf of the Mayor must be cleared by the Chief Executive. All press releases are issued via the Communications Team Leader & Marketing Manager.

9A.3 CIVIC

a) Civic Events & Transport

Arrangements will be made to provide a Chauffeur-driven hire car for the specific events shown with an * in Appendix B for which a budget of ~~£5,000~~ £4500 has been set aside. At the weekly diary meetings, the Mayor may also request the use of a chauffeur-driven hire car for other events, subject to the budget being available. Once the budget has been expended, the Mayor will have to make his own arrangements for travelling to any other events utilising his Mayoral Allowance whether or not the event is listed in the mayoral protocol. At his discretion, the mayor can request that the budget be allocated towards a Civic Service and/or Civic Dinner, subject to the budgetary limits not being exceeded.

b) Mayor's Parlour

The Mayor and Deputy Mayor will be informed, orally, of security arrangements to be observed in regard to the use of the Parlour.

Note: Fire regulations mandate that the Parlour is not suitable to accommodate more than 40 occupants at any time.

The Parlour is generally not used without the express permission of the Mayor. However, permission is not needed when, for example, the Deputy Mayor is substituting for the Mayor. In these cases, he or she is properly acting as host and is free to use the facilities of the Parlour.

Similarly, when there are visitors to the Council and it is considered appropriate for those visitors to sign the Visitors' Book located in the Parlour, the Assistant Director – Democracy & Governance shall have authority to arrange for the signing to take place in the presence of the most appropriate Member of the Council available at that time. The Mayor's Office staff may enter the Parlour to prepare it for such purposes.

The Silver Collection is notated and fully described, and a copy will be made available to assist the Mayor/Deputy Mayor in his/her delivery of "The Silver Talk". Should the Mayor/Deputy Mayor require any additional information on any of the items displayed in the Parlour, the Assistant Director – Democracy & Governance will be happy to arrange for the Mayor/Deputy Mayor to be briefed.

The Council operates a No Smoking Policy in all Council buildings and vehicles. This extends to the Mayor's Parlour at the Town Hall.

e)

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dc) **Events in the Civic Calendar** (See Appendix B)

i) **Annual Meeting of the Borough Council and Mayor Making Ceremony**

The Mayor robes for this Ceremony.

The retiring Mayor invites selected guests, i.e.

- Mayor and Mayoress/Consort Elect
- Deputy Mayor and Deputy Mayoress/Consort Elect
- Mayor's Chaplain and Partner (if appointed)
- Mayor Elect's Chaplain and Partner (if appointed)
- Chief Executive and Partner into the Mayor's Parlour for tea and biscuits at 5.00p.m, prior to the Annual Council Meeting of the Borough Council and Mayor Making Ceremony.

The Annual Meeting commences at 6.00p.m.

The Mayor Elect may invite his or her own personal guests to the Annual Meeting; these should not exceed 30.

After the Annual Meeting, it is customary for the new Mayor to invite a small number of personal guests for a modest buffet in the Parlour.

Note: Fire regulations mandate that the Parlour is not suitable to accommodate more than 40 occupants at any time. For this purpose, the Mayor's additional guests should remain with other guests in Committee Rooms A and B.

e) **Civic Service or Civic Carol Service**

During the Civic Year the Mayor may choose to host either a Civic Service or a Civic Carol Service, which should be held between December and April.

The Mayor robes for the Service.

If there is to be a procession, Members of the Council and members of organisations participating will be given written instructions and an Order of Procession.

Following the Service the congregation will be invited to join the Mayor and Mayoress/Consort for tea, coffee, soft drinks and biscuits or mince pies as appropriate.

f) **Civic Dinner**

The Civic Dinner is a formal occasion. The venue for the Civic Dinner shall be at a suitable location within the Borough and funded from within the Civic

Events & Transport Budget. Past venues have included Weston Hall and the North Warwickshire & Hinckley College.

g) Remembrance Day Parades and Services

The Nuneaton Remembrance Service is organised by the Nuneaton Remembrance Parade Group and Council Officers are members of that group.

The Mayor robes for this Service.

The Mayor and Clergy will meet in the Town Hall, Nuneaton, to robe. Members, Officers of the Council and invited guests will join the Mayor at the Town Hall to walk in procession to the War Memorial.

After the Service, there will be a March Past and the Mayor will take the Salute outside the Town Hall.

Invited guests (to whom tickets will be issued) may join the Mayor for refreshments after the March Past, comprising of tea, coffee, soft drinks and [savoury-snacksbiscuits](#).

The Deputy Mayor attends the Bedworth Remembrance Service, which is organised by the Bedworth Branch of the Royal British Legion.

The Deputy Leader will be the nominated representative to attend the Bulkington Remembrance Service, which is organised by the Bulkington Branch of the Royal British Legion. Ward Members can attend other such services within their Wards as representatives of the Council.

h) Armistice Day Parade and Service

This Service is organised by the Bedworth Armistice Day Committee and is supported by the Council.

The Mayor robes for the Service.

Invited guests (to whom tickets will be issued) will congregate at the Civic Hall and will join the procession to the Cemetery.

Following the Service, there will be a March Past and the Mayor will take the Salute.

Invited guests (to whom tickets will be issued) may join the Mayor for tea/coffee/soft drinks after the March Past. The Bedworth Armistice Day Committee may host a buffet lunch after the Parade to which a selected number of guests may be invited, but this should not be assumed.

i) Special Events and Promotions

The Mayor is expected to take part in the Carnival Processions/Gala Day Celebrations for Nuneaton, Bedworth and Bulkington.

The Mayor is also expected to be present at the Christmas Lights Switch-ons at Nuneaton ~~and~~; Bedworth ~~and Bulkington~~.

Other events (which may or may not take place) at which the Mayor is asked to be present include:

~~1. Civic Bonfires (The Mayor and Deputy shall alternate their attendance annually to the Nuneaton and Bedworth bonfires). For the Civic Year May 2015/16, the Mayor shall attend the Nuneaton bonfire and the Deputy Mayor the Bedworth bonfire)~~

- Duke of Edinburgh Awards Presentation Evenings
- Services to the Community Awards
- Nuneaton Festival of Arts
- Sports Personality of the Year Awards
- Long Service Awards, Celebrate Success and Chief Executive Awards
- Nuneaton Carnival Queen Selection Evening (Deputy Mayor).

Where the Council is made aware of a Borough resident reaching the age of 100 (or over), and the Mayor or Deputy Mayor receives an invitation to visit, an appropriate card and small gift will be organised by the ~~Committee~~ Democratic Services Office.

From time to time, the Mayor or Deputy Mayor may be asked to attend promotional events within the Borough linked to the activities delivered by the Council. Such requests shall be made through the Mayor's Office.

The Mayor may on occasion be asked to unveil corporate and commemorative plaques, but this should only take place with the agreement of the Assistant Director – Democracy & Governance.

Appropriate risk assessments will be carried out to ensure that procedures are all in place to ensure the safety of the Mayor and Deputy Mayor at events/activities. This will include identifying any events at which a Council Officer or appointed person should accompany the Mayor during the event, e.g. Christmas Lights Switch-on.

9A.4 Ceremonial

a) **The Mace Bearer**

The Mace Bearer bears the Council's Ceremonial Mace at meetings of the Full Council and other such special Civic events as those detailed below:

- All Full Council Meetings and Extraordinary Council Meetings.
- Annual Meeting of the Borough Council and Mayor Making Ceremony.

- Launch of the Poppy Appeal.
- Remembrance Sunday Service and Parade.
- Civic Service.
- Freedom of the Borough Parades.

Other dates may be added with the agreement of the Assistant Director – Democracy & Governance.

Where appropriate on such occasions, he or she will also announce the Mayor or Deputy Mayor.

b) **Attendance at Functions**

Procedures in relation to invitations and acceptance by the Mayor are well established and dealt with, in writing, by the Mayor's Office. The Assistant Director – Democracy & Governance can give advice on any point not covered.

Note:

- If the Mayor cannot accept an invitation, and it is considered that the occasion necessitates a Civic presence, then the engagement may be offered to the Deputy Mayor. If the Deputy Mayor is also unavailable, the Leader or appropriate Portfolio Holder may stand in.

The Mayor will receive a variety of invitations during the Civic year. The main consideration is whether the Mayor's attendance at a particular event contributes to the Council's Corporate Plan Themes and priorities.

The following invitations have been identified and are ranked in priority order:

- **Council/Statutory or Tradition** - Chairing Council Meetings, attending Remembrance Services and Parades. These events are largely covered in the Protocol.
- **Civic Events** – Civic Dinner; Civic Service.
- **Promotional Events** - Council initiatives, projects and activities.
- **Community Events** - Community organised functions such as local amateur dramatics, faith groups, sports clubs, residents' groups, etc.
- **Charities** - Local fund raising activities.
- **AGMs or Open Days** - By invitation and suitability from partner organisations, local charities and community groups.
- **Civic Circuit** - Visiting other Civic Services, Dinners and Civic Days.
- **Other Social/Social Clubs/Organised Parties** - If appropriate.

Once an engagement has been accepted, the Mayor's Office will send out a

pro-forma to the organisers to establish key information regarding the event.

The Mayor is sometimes called upon to give brief impromptu speeches at functions without warning. In these cases, a long speech is not necessary, just a few words to express genuine feelings about the event and demonstrate care for those present.

Prior to an event, the Mayor shall not make contact with the host to elicit any additional hospitality or benefits in kind. On an official occasion to which the Mayor has been invited, the Mayor shall not ask for an extension of the hospitality being provided.

At functions, it is usual and preferable that the Mayor should leave ahead of the last guests. However, it is not protocol for the Mayor to leave a Dinner except by arrangement, before the Toast to the Guests has been proposed and responded to.

If the Mayor is in any doubt as to protocol, advice is available prior to an engagement from the Assistant Director – Democracy & Governance.

The Mayor will be accorded precedence at all official functions called or hosted by him or her or the Council, which are held within the Borough. When other Civic dignitaries such as fellow Mayors or Chairs of the County Council, and particularly the Lord-Lieutenant and High Sheriff are present, guidance will be given on the correct procedures.

Guidance will be provided on the appropriate use of gifts from the Civic Stock for corporate functions, though gifts are the exception rather than the rule.

The Deputy Mayor, when representing the Mayor, is accorded the same precedence. There may be occasions when the Deputy Mayor is not available but it is appropriate for the Mayor to send a representative. Such occasions should be discussed with the Assistant Director – Democracy & Governance. Where it is agreed that it is appropriate to send a representative, the Leader must select that representative from serving Members of the Cabinet.

The Mayor and Deputy Mayor should avoid where possible being away on holiday at the same time. The ~~Committee~~ Democratic Services Office must be advised of all intended holiday dates so this situation can be avoided.

The Mayor or Deputy Mayor may be presented with gifts during their Civic Year. If the value is under £20.00, these can be retained for personal use. For a gift of higher value, the Mayor or Deputy Mayor should inform the ~~Member & Committee Services Officer~~ Democratic Services Team Leader, who maintain a record of all gifts received. If the gift is of such a value that it should be retained or possibly displayed in the Mayor's Parlour the gift should, once registered, be handed to the Mayor's Office.

If the gift is of a nature that it could be used for the Mayor's Appeal then this can be done (the appropriateness of this will need to be considered especially the likely feelings of those who presented the gift/s).

c) **Robes and Mayoral Chains**

The Robes will be worn at the Annual Meeting of the Borough Council and Mayor Making Ceremony and on other specific occasions when appropriate.

The Council retains two Chains of Office:

- The Ceremonial Chain.
- The Civic Chain (known as "the Bedworth Chains").

The **Ceremonial Chain** is worn on the following occasions:

- Annual Meeting of the Borough Council and Mayor Making Ceremony.
- All Full Council Meetings and Extraordinary Council Meetings.
- Civic Service or Civic Carol Service.
- Launch of the Poppy Appeal.
- Remembrance Day Parade and Service.
- Freedom of the Borough Parades and Services.
- Civic Funerals.

The **Civic Chain** is worn on all other Civic occasions.

Note: Robes and Chains

The Mayor is responsible for the care and safety of the civic regalia when they are worn to events. Although the Chain and Badge are insured, they should be kept safe and locked away whilst in their possession either at the Town Hall or in their home safe. The Chains shall not at any time be held overnight at another location.

— The Chain not being worn will be locked in its specially commissioned case and locked out of sight in the designated cupboard or home safe. Or if in transit be placed in the boot of the vehicle or otherwise out of sight to avoid damage in transit.

The Chains cannot be worn outside the Borough without prior consent of the Mayor or the Chairman of the District or Borough concerned.

~~The Mayor will be responsible for custody of the Chains both before and after engagements.~~

~~When the Chains are not being worn, they should be locked within the specially designed case in order to avoid damage in transit.~~

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~~When not in use, the Chains shall be kept in their secure location. The Chains shall not at any time be held overnight at another location.~~

The Chains should not be loaned or placed in the custody of any other person other than the Democratic and Election Services Management and/or Assistant Director – Democracy and Governance

The Mayor or Deputy Mayor should inform Democratic and Election Services Management and/or Assistant Director – Democracy and Governance immediately if their Chains of Office are lost, mislaid, stolen or otherwise missing in order that the Council's insurers can be informed.

The Robes will generally be kept at the Town Hall or the Mayor can on occasion take them home if they are needed for any visits.

Guidance on the care and maintenance of the Chains is provided by Thomas Fattorini Ltd, Birmingham. See Appendix D.

d) **Town Twinning**

All matters relating to Twinning arrangements are dealt with by the Portfolio Holder for Business & Regeneration and/or the Cabinet, in conjunction with the Mayor.

It should be noted that the difference in the powers of respective Mayors in France, Spain and Germany from those in this country is known and respected. So, whilst the focus on the Mayor is maintained in events as the host, figurehead or leading citizen, it is the political leadership rather than the Mayor who shall address policy and political matters.

9A.5 **Other**

a) **Mayor's Charity Appeal**

It is traditional for an incoming Mayor to nominate a Charity Appeal during their Year of Office. This is entirely voluntary and unrelated to the normal duties of being Mayor.

It is the Mayor's responsibility to establish a Fundraising Committee and appoint a Chair, Secretary and Treasurer. The Treasurer will be responsible for opening a bank or building society account into which all monies raised should be deposited. It is the Treasurer's responsibility to pay in all monies and keep accurate records of all monies raised. Guidance notes on setting up the Mayor's Charity Appeal are attached as Appendix E.

As it is not directly related to the duties of Mayor, the Council offers limited support to the Mayor's Appeal. The Council's support comprises of the costs and organisation of the Launch of the Mayor's Appeal, traditionally the day after the Annual Meeting of the Borough Council and Mayor Making Ceremony.

Notes:

Employee contributions in terms of time given to the Mayor's Appeal are given on an entirely voluntary basis and at no cost to the Council.

b) **Honouring Servicemen and Women of the Borough and other Dignitaries**

Sadly, in times of conflict there is a possibility that servicemen and women from the Borough will lose their lives in defence of our Country. Protocol for these circumstances are attached as Appendix F and Appendix G.

c) **Outside Bodies**

The Mayor, by virtue of the Office, may be asked to represent the Council on some community or charity organisations. This may include being asked to be President or Vice President for the Mayoral year.

It is preferable for the Mayor to accept such offices only of organisations where activities relate to the whole area of the Borough. Furthermore, it is advised that a Vice-Presidency should only be accepted where such Office is not inconsistent with the Mayor's standing in the Borough. The Assistant Director – Democracy & Governance will be happy to give advice prior to accepting an Office.

d) **Formalities**

It is, of course, important for the Mayor and Deputy Mayor to recognise the formal nature, dignity and responsibilities of that Office.

In the company of others, employees will be expected to be formal, in address and manner. 'Mr/Madam Mayor', 'Madam Mayoress/Consort' will be the normal form of address, or alternatively Sir or Madam.

Finally, remember that the Assistant Director – Democracy & Governance and his officers are there to help in any way they can. A list of Officers and their roles is attached as Appendix G. It is a considerable honour to be elected Mayor and Deputy Mayor, and these honours are to be enjoyed.

APPENDIX A

CIVIC CHRISTMAS CARD LIST

- All Members of the Borough Council
- [All Members of the County Council \(within the Borough\)](#)
- [All Honorary Alderman/Alderwoman and Honorary Freeman/Freeman](#)
- Chief Executive
- Directors
- Civic Heads:
 - Warwickshire County Council
 - North Warwickshire Borough Council
 - Rugby Borough Council
 - Stratford Upon Avon District Council
 - Warwick District Council
 - Coventry City Council
 - Solihull Met. Borough Council
 - Hinckley & Bosworth Borough Council
 - Mayors of all Twin Towns
- Three MPs
- Lord Lieutenant of Warwickshire
- High Sheriff of Warwickshire
- Mayor of the West Midlands Combined Authority
- Chief Executive of the George Eliot Hospital Trust
- 30th Signal Regiment
- Royal Regiment of Fusiliers
- Queen's Gurkha Signals
- Mayor's Chaplain
- Chief Constable
- Police & Crime Commissioner

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- Police - Nuneaton ~~and Bedworth~~ Stations
- West Midlands Ambulance Service
- Fire Stations - Nuneaton ~~and Bedworth~~
- Organisations of which the Mayor is Chair
- Organisations the Mayor attends as Member
- Editors of:
 - Nuneaton News
- Chair of the Coventry & Warwickshire LEP
- Chair of Nuneaton Business Alliance
- Anker Radio
- Free Radio Hits Radio
- BBC CWR
- Various Charitable Organisations
(e.g. Manager of Bedworth and District CAB, Advice Rights, DIAL)

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APPENDIX B

TABLE OF EVENTS IN CIVIC CALENDAR

Event	Comments	Robes to be Worn
Annual Meeting of the Borough Council and Mayor Making	<p>Tea and Biscuits at 5pm in Mayor's Parlour.</p> <p>Annual Council commences at 6pm. Up to 30 guests may be invited.</p> <p>Following Annual Council, the new Mayor may invite a small number of personal guests for a modest buffet in the Parlour.</p>	Y
Attendance at the Royal Garden Party, Buckingham Palace	Civic Chain to be worn with Borough Emblem. Out of pocket expenses up to £100 to be met from the budget provided by the Council.	N*
Civic Service or Civic Carol Service	<p>At the Mayor's discretion, host either a Civic Service or Civic Carol Service between December and April.</p> <p>Following the Service members of the congregation will be invited to join the Mayor and Mayoress/consort for tea, coffee, soft drinks, biscuits or mince pies as appropriate.</p>	Y
Civic Dinner	<p>At the Mayor's discretion, host a Civic Dinner.</p> <p>Recommended dress code – Black Tie.</p>	N
Remembrance Day Parade	<p>After the Service and March Past in Nuneaton, invited guests (with tickets) may join the Mayor for refreshments.</p> <p>The Deputy Mayor attends Bedworth Remembrance Service.</p>	Y

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<p>Armistice Day Parade and Service</p>	<p>Following a procession to Bedworth Cemetery and March Past the Mayor and invited guests (with tickets) may be invited to attend a buffet lunch by the Bedworth Armistice Day Committee but this should not be assumed.</p>	<p>Y</p>
<p>Special Events and Promotions</p>	<p>The Mayor is expected to take part in the Carnival Procession/Gala Day Celebrations for Nuneaton, Bedworth and Bulkington.</p> <p>Also to be present at the Christmas Lights Switch-on at Nuneaton, and Bedworth and Bulkington.</p> <p>Civic Bonfires will be alternated each year between the Mayor and Deputy Mayor to Nuneaton and Bedworth (eg:2011/12 the Mayor shall attend Nuneaton).</p> <p>When an invitation is received, a card and small gift will be given to a Borough resident reaching the age of 100 or more.</p> <p>Other Possible Events:-</p> <ul style="list-style-type: none"> • Duke of Edinburgh Awards Evening • Service to the Community Awards • Nuneaton Festival of Arts • Sports Personality of the Year Awards • Long Service, Celebrate Success/ Chief Executive Awards • Nuneaton Carnival Queen Selection Evening (Deputy Mayor) 	<p>Y</p>

APPENDIX C

PREPARATION FOR WEARING REGALIA

'Getting Dressed'

Please use the gloves provided whenever handling the regalia as oils and residue on skin, even after washing, can cause a chemical reaction with the gold plate and the sterling silver link underneath. The effects of this reaction are very slow and difficult to detect until it is too late. Therefore the less the regalia is handled with 'naked' hands the longer it will look pristine.

- a) We recommend that an Assistant is always provided to aid the Official Wearer when putting on the regalia. Attempting to do this alone often results in accidental damage.
- b) Always remove the Chain from its case by holding it at either side (where the shoulder fittings are located) to protect the Official Wearer from swaying hooks or pins. This is the easiest way to put the Chain in the correct position for 'dressing'.
- c) The Chain should be put on first, from the back and over the head, with the centre link (the one that holds the pendant) towards the front – centre.
- d) The Pendant should then be attached. The Official Wearer should take the majority of the pendant's weight to enable the Assistant to easily observe where any retaining chain needs to be attached.
- e) Attach the retaining Chain behind the neck (approximately over the collar bone, i.e. forward from the shoulder seam on the jacket between 1 and 2 inches) to ensure the retaining Chain takes the weight of the Pendant. Finally, arrange the jacket collar so that it covers the retaining chain.

After the Event and Storage Care

- a) When removing the regalia, detach the Pendant first. The retaining chain should then be disconnected before finally removing the official wearer's Chain (from behind to protect them from being injured by the shoulder hooks or pins).
- b) It is important that the retainer is completely removed from the Chain after each occasion, as the position for fastening the retaining chain will change slightly each time, depending upon the official wearer's clothing.
- c) Wherever possible we suggested that you store the retaining chain in a separate bag within the case. This will help to prevent any damage to enamelled areas.

APPENDIX D

GUIDANCE NOTES ON SETTING UP MAYOR'S CHARITY APPEAL

Background

It has been traditional for the incoming Mayor to nominate a Charity Appeal during the Year of Office.

There is no requirement to do this and it is not related to the official duties of a Mayor. It is, therefore, a choice for each Mayor to make. As it is not related to the official duties of the Mayor, public funds cannot be used to support the Appeal, either through employee or financial resources, except in a limited way, for example, helping with the launch and receipt of money which is handed direct to the Mayor rather than collected by the Organising Committee.

As it is the Mayor's sole decision on whether to have an Appeal, it needs very serious consideration at an early stage - preferably as soon as becoming Deputy Mayor.

Important Principles

As the Appeal will be directly associated with the Mayor, as First Citizen of the Borough, it is vital that:-

- a) It is an appropriate charity which is supported. A local connection is always useful, e.g. Hospice, although national charities which would cover the needs of the Borough would also be appropriate, e.g. Guide Dogs for the Blind.
- b) There is an accountable fund raising group which reports to the Mayor and is independent of the Council. In the case of a national charity and some local charities, there may already be a properly constituted body who have audited financial arrangements. It may be possible for a volunteer group to act for the charity but all accounting and banking arrangements must be agreed with the charity.
- c) If the Mayor chooses a charity which does not have an existing accountable body, then one would have to be formed. The Mayor shall consider who would comprise the constituted body, how it could be formed, the financial arrangements, and ensure that all financial transactions are properly audited. The Mayor is advised to get separate, independent legal advice on this course of action.
- d) The fund raising body has the capacity and expertise to undertake the Appeal. For some small organisations this could be a daunting task. An alternative is to look for an organisation to carry out the Appeal on behalf of the specific nominated charity, e.g. Lions or Round Table.
- e) There may be initial set-up costs, e.g. to launch the Appeal or draw up a Constitution. An existing charity or organisation may be prepared to underwrite the set-up costs, the Council will help with the launch day.
- f) The Mayor and Fund Raising Committee need to give very careful consideration to setting a target - this puts additional pressure on the Mayor and Organising Committee, especially as the Press is likely to take an active interest.
- g) Care should also be taken in nominating a particular use for any money raised unless a full feasibility study has been undertaken. This is particularly the case of

building projects, where costs may be difficult to predict and planning permission and/or building regulations may be required. Consideration also needs to be given to whether a particular use will give rise to subsequent maintenance or running costs and that these can be sustained in the long term.

- h) If the Mayor does choose to nominate more than one charity, there must be an agreement between the charities and the Mayor that all functions are run for the benefit of all the charities, and they have equal share of time and resources. This should be decided prior to the launch of the Appeal.
- i) In organising a fund raising event, the risk of the income not covering costs must be carefully considered, and any costs incurred must be open to public scrutiny. Any losses will have to be borne by the fund raising group.

Detailed Financial Arrangements

- a) Whether it is an established charity or a special fund raising body, it should set up a separate bank account for the Mayor's Appeal so that it can be audited separately at the end of the year.
- b) A Treasurer and Deputy Treasurer shall be nominated from the fund raising group if an existing charity organisation is not being used, who shall be responsible for maintaining account details - i.e. income and outgoings. The Bank will give advice on setting up a bank account. Accountants should be appointed at the beginning of the Appeal. Early advice from the accountants on the financial arrangements for the Appeal should be sought.
- c) As with other charities and organisations, it is a normal banking requirement to have two from four signatories for the signing of cheques.
- d) Two persons should count all cash income, a receipt for the amount counted should be returned to the event organiser, and a copy retained for audit purposes. Arrangements for banking of the cash should consider the security of the person taking the money to the bank - in cases of large sums of money, it might be advisable that two people go.
- e) The Mayor should be sent a monthly bank statement. The Mayor should also inspect the account records on a monthly basis.
- f) At the end of the Mayor's year, the accounts should be audited by independent (or charity) accountants and on completion of the audit the account should be closed and all remaining money sent to the nominated charity or charities.
- g) The costs of the audit are to be borne by the Mayor's Charity account. A copy of the final statement and the audited accounts should be sent to the Mayor and Audit & Governance Manager.
- h) If the Mayor is concerned with any aspect of the bank statement or accounts, he or she should ask the Treasurer to investigate, who will then advise the Mayor on appropriate action. If the Treasurer has any concerns or questions, these will be addressed direct to the Mayor.
- i) Any cheques directly received by the Mayor should be given to the Treasurer. Any cheques received by Council officers will first be receipted and shown to the Mayor and then given to the Treasurer with the receipt.

- j) Any cash received directly by the Mayor should be put in a sealed envelope or bag and handed to the ~~Democratic Services Committee & Member Support Services~~ Office at the first opportunity. The ~~Committee & Member Support Services~~ ~~Democratic Services~~ Office will arrange for the money to be counted in accordance with the Council's cash handling procedures and given to the Mayor at the first opportunity. The Mayor will sign for the monies given. The Mayor shall then pass the monies to the Treasurer.
- k) No Council officer shall have any role in the financial arrangements of the charity above and beyond those activities described in this appendix.
- l) The Mayor and/or Organising Committee may wish to consider insurance cover against theft or loss before money is banked. All money received should be handled by nominated officers of the fund raising group or charity.

Other Aspects

- a) The Mayor can seek the advice of the Assistant Director – [Democracy and Governance](#) who is authorised to provide advice and assistance on the appropriateness of nominating a particular Charity.
- b) Employees may be prepared to give their time voluntarily to the charity but this must not affect their work commitments, and it should not be prejudicial to their job duties. No officer should use the Council's resources on Appeal work and this should not be expected of any officer.
- c) If any officer is prepared to help the Charity in their own time, they will not be acting in any capacity on behalf of the Council.
- d) If the Mayor is not happy with the arrangements put in place and feels they may reflect on his/her status as First Citizen and Chair of the Council, he/she should alert the Assistant Director-[Democracy and Governance](#)- immediately.

APPENDIX E

SERVICEMEN AND WOMEN OF THE BOROUGH WHO HAVE LOST THEIR LIVES IN DEFENCE OF OUR COUNTRY

Sadly, in times of conflict there is a possibility that servicemen and women from our Borough will lose their lives in the defence of our country. In these circumstances the protocol to be adopted is as follows:

a) **Borough Flag**

The Borough Flag shall be flown at half-mast for a period of 24 hours to announce the loss of a serviceman or woman of the Borough on first public notification, then again from 0800 until 1700 on the day of the funeral.

b) **Family Correspondence**

As first citizen of the Borough, it is appropriate for the Mayor (or in the Mayor's absence the Deputy Mayor) to write to the bereaved family to express their condolences on behalf of the Borough for their loss. It is not thought appropriate that the family should receive additional formal letters from either officers of the Council or from Members.

c) **Books of Condolence**

A Book of Condolence shall be opened for the public at Nuneaton Town Hall. These shall remain open for a period of six weeks, after which time arrangements will be made for the Books to be received by the family.

APPENDIX F

Protocol for The Borough Flag

A new Borough Flag was purchased in the autumn of 2010.

1. At the discretion of the Chief Executive, in consultation with the Leader of the Council, the Borough Flag is flown in place of the Union Flag on the following occasions:

- The death of a serving Councillor
- The death of a serving MP
- The death of an ex-Mayor
- The death of a serving Mayor
- The death of a [Honorary Freeman/Freewoman](#) of the Borough
- The death of an Honorary Alderman/[Alderwoman](#) of the Borough
- The death of a citizen of the Borough on active service in [Hiser](#) Majesties' Armed Forces
- The Day of Annual Full Council (Mayor Making).

2. On the Death of a Serving Councillor

The Borough Flag is flown at half-mast from sunrise to sunset on the day of the funeral

3. On the Death of a Serving MP

The Borough Flag is flown at half-mast from sunrise to sunset on the day of the funeral

4. On the Death of an Ex-Mayor

The Borough Flag is flown at half-mast from sunrise on the day of the funeral to immediately after the funeral. (add two hours to the commencement of the funeral and lower Flag then).

5. On the Death of a Serving Mayor

The Borough Flag is flown at half-mast from the day of the announcement of death to immediately after the funeral. (add two hours to the commencement of the funeral time and lower Flag then).

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Constitution Version
August 2025

6. On the Death of an [Honorary Freeman](#)/[Freewoman](#) of the Borough

The Borough Flag is flown at half-mast from sunrise to sunset on the day of the funeral.

7. On the Death of an Honorary Alderman/[Alderwoman](#) of the Borough

The Borough Flag is flown at half-mast from sunrise to sunset on the day of the funeral.

8. On the Death of a Citizen on Active Service

The Borough Flag is flown at half-mast from sunrise to sunset on the day of the funeral.

9. Annual Full Council (Mayor Making)

The Borough Flag is flown at full mast from sunrise to sunset on the day of Annual Council.

APPENDIX G

OFFICER CONTACTS

Mayoral Office Administration	
Assistant Director - Democracy & Governance 024 7637 6258	Responsible for all matters set out in the Mayor's Protocol, relating to expenditure in regard to Civic administration duties.
Member & Committee Services Officer/Democratic Services Team Leader 024 7637 6619	To act if both the Chief Executive and Assistant Director are absent.
Mayor's Office 024 7637 6439	Carries out day to day operation of the Mayorality activities including secretarial and administrative support for Mayorality activities.
Civic Events	
Assistant Director – Economy and Regeneration 024 7637 6549	Responsible for all matters relating to Civic events. Supports the Civic events, activities and is responsible with the Town Centres & Marketing Team for the delivering the day-to-day operations of the Civic events.
Communications and Marketing Team Leader Team Leader 024 7637 6507299	Responsible for Corporate Communications

AGENDA ITEM NO. 10

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Date of Meeting:	17 th March 2026
Subject:	Anti Money Laundering Framework & Anti-Fraud, Corruption and Bribery Strategy
Portfolio:	Not Applicable
Responsible Officer:	Assistant Director – Democracy and Governance & Assistant Director – Finance
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Strive for transparency and accountability, in all that we do. Increase public scrutiny. and Set ambitious and challenging budgets, to ensure taxpayers money is respected, and high-quality services are delivered.
Ward Relevance:	All
Public or Private:	Public
Forward Plan:	No
Subject to Call-in:	No

1. Purpose of report

- 1.1. To provide the Audit and Standards Committee with the reviewed Anti Money Laundering Framework and Anti-Fraud, Corruption and Bribery Strategy for consideration, approval and referral to Full Council for adoption.

2. Recommendations

- 2.1. That the revised Anti Money Laundering Framework be endorsed;
2.2. That the revised Anti-Fraud, Corruption and Bribery Strategy be endorsed; and
2.3. It be recommended to Full Council:

- 2.3.1. to approve and adopt the revised Anti Money Laundering Framework and the Constitution be updated accordingly; and
- 2.3.2. to approve and adopt the revised Anti-Fraud, Corruption and Bribery Strategy and the Constitution be updated accordingly.

3. Background

- 3.1. The current Anti Money Laundering Framework and Anti-Fraud, Corruption and Bribery Strategy both reside in the Constitution at parts 4J and 4I. Both haven't been reviewed since 2017. Both are on the work programme for the Audit and Standards Committee for the 2025/2026 Municipal Year.

4. Body of report and reason for recommendations

4.1. Anti Money Laundering Framework

- 4.1.1. Money laundering is any activity used to conceal or disguise the nature, source, location, ownership or control of currency or assets. It is most often an attempt to hide the proceeds of dishonest or criminal activity and to try to give the impression that the income is from a legitimate source so that it can be used.
- 4.1.2. The purpose of the Framework is to maintain the high standards of conduct, which currently exist within the Council by preventing criminal activity through money laundering.
- 4.1.3. The Framework includes the following sections:
 - 4.1.3.1. Policy Statement
 - 4.1.3.2. Introduction – legislative background
 - 4.1.3.3. Scope
 - 4.1.3.4. Nominated Officer or Money Laundering Reporting Officer
 - 4.1.3.5. Disclosure Procedure
 - 4.1.3.6. Cash receipts
 - 4.1.3.7. Due Diligence checks
- 4.1.4. The changes are minor, relating to staff personnel and job titles. Appendix A shows the tracked change version for consideration.

4.2. Anti-Fraud, Corruption and Bribery Strategy

- 4.2.1. The Council is committed to the prevention, deterrence, detection and investigation of all forms of fraud and corruption, whether these are attempted from within or outside the organisation. The Council operates a zero tolerance on fraud and corruption, all instances will be investigated and the perpetrator(s) will be dealt with in accordance with established

policies. Where necessary, the Council will seek to recover the proceeds of any fraudulent activity from identified offenders.

4.2.2. The purpose of the Strategy is to maintain the high standards of conduct and to summarise the responsibilities of members, managers, employees, and others and outlines the procedures to be followed where suspicion of an irregularity is raised with evidence.

4.2.3. The Strategy includes the following sections:

4.2.3.1. Introduction

4.2.3.2. Policy Statement

4.2.3.3. Definitions

4.2.3.4. Culture

4.2.3.5. Prevention

4.2.3.6. Deterrence

4.2.3.7. Detection and Investigation

4.2.3.8. Training

4.2.3.9. Conclusion

4.2.4. The changes include staff personnel and job titles, inclusion of Cyber Crime, updates to the definitions section, reference to the Confidential Reporting Code in the Constitution (ref 5I), acknowledgement of internal audit being undertaken by the Central Midlands Audit Partnership (CMAP) and removal of the Benefit Fraud Prosecution Policy as that falls separately and has its own procedure. Appendix C shows the tracked change version for consideration.

5. Consultation with the public, members, officers and associated stakeholders

5.1. A Consultation process was undertaken by the Assistant Director – Democracy and Governance internally towards the end of the 2025 calendar year. This was directed to Senior Leadership Team. All feedback received was incorporated into the revised documents which was then approved internally by Senior Leadership Team 20th January 2026.

6. Financial Implications

6.1. No direct financial implications related to the adoption of either revised document.

7. Legal Implications

7.1. The Council must have a sound system of internal control which facilitates the effective exercise of its functions, including risk

management. This is both a legal requirement and a requirement of the Financial Regulations set out in the Council's Constitution.

- 7.2. No direct legal implication related to the adoption of either revised document. Both documents do include context related to associated legislation and thus, having the revised documents in place supports the Council in ensuring instances of Money Laundering and or corruption and bribery are dealt with effectively.

8. Equalities implications

- 8.1. A review has been undertaken and it has been identified that no assessment is required following consultation and liaison with the appropriate officer.

9. Health implications

- 9.1. No direct health implications are associated to this report.

10. Climate and environmental implications

- 10.1. No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

- 11.1. Whilst the two policy documents have no direct disorder implications, they support our duty as a Local Authority under Section 17 and support in terms of tackling crime.

12. Risk management implications

- 12.1. No direct risk management implications have been identified, but the two policy documents support mitigate of risk and set out the responsibilities and procedure to follow should conduct result in either policy being applicable in a given case/scenario. It also supports the existing mitigation included in the Council Strategic Risk Register dated 9th January 2026 as report to the Audit and Standards Committee 3rd February 2026 agenda item 11 (R34 – Corporate Fraud), specifically item 15. Council policies and procedures (Employee Code of Conduct, Gifts & Hospitality Policy, Anti-Fraud, Corruption and Bribery Strategy, Anti-Money Laundering Policy, Whistleblowing Procedures).

13. Human resources implications

- 13.1. No direct human resource implications have been identified other than matters included in both policy documents under consideration.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Due to changes in job titles, organisation structure and arrangements. Therefore, failing to update, causes confusion and ambiguity as the documents wouldn't be up to date and/or refreshed.

15. Conclusion

15.1. In summary, the revised Anti Money Laundering Framework and Anti-Fraud, Corruption and Bribery Strategy reflects the current organisation structure and refreshes responsibilities. The Audit and Standards Committee is therefore invited to consider and endorse both draft policy documents and recommend that Full Council approve and adopt the revised Anti Money Laundering Framework and Anti-Fraud, Corruption and Bribery Strategy. In doing so, it ensures that the Council's governance arrangements remain fit for purpose and aligned with the principles of good governance that underpin public trust and organisational safeguards.

16. Appendices

16.1. Please note the following appendices:

- i. Appendix A - Anti Money Laundering Framework 2026 - Tracked Changes
- ii. Appendix B - Anti Money Laundering Framework 2026 - Clean Version
- iii. Appendix C - NBBC Anti Fraud Strategy 2026 - Tracked Changes
- iv. Appendix D - NBBC Anti Fraud Strategy 2026 - Clean Version

17. Background papers

17.1. Please note there are no background papers attached to this report.

18. Report Writer Details:

Officer Job Title: Matthew Wallbank

Officer Name: Assistant Director – Democracy and Governance

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

POLICY STATEMENT

Nuneaton and Bedworth Borough Council will do all it can to: -

- prevent, wherever possible, the organisation, its employees and Members being exposed to money laundering;
- identify the potential areas where money laundering may occur and take appropriate action to minimise the risk; and
- comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases.

Every employee and Member also has a personal responsibility to be vigilant.

1. Introduction

a) The requirements of the UK anti-money laundering regime are set out below:

- The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017
- The Proceeds of Crime Act 2002 (as amended by the Crime and Courts Act 2013 and the Serious Crime Act 2015)
- The Money Laundering Regulations 2007
- The Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001, the Terrorism Act 2006 and the Terrorism Act 2000 and Proceeds of Crime Act 2002 (Amendment) (Regulations 2007)

b) Local authorities and their staff are subject to the full provisions of the Terrorism Act and may commit most of the principal offences under the Proceeds of Crime Act 2002 (the POCA). Public authorities are not, however, legally obliged to apply the provisions of the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and the Money Laundering Regulations 2007. Nevertheless, as responsible public bodies, they have a responsibility for the proper conduct of public business so should embrace and adopt the underlying principles of the money laundering legislation and regulations.

2. Scope of The Framework

a) This policy applies to all Members and employees of the Council and aims to maintain the high standards of conduct, which currently exist within the Council by preventing criminal activity through money laundering.

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

3. What is Money Laundering?

- a) Money laundering is any activity used to conceal or disguise the nature, source, location, ownership or control of currency or assets. It is most often an attempt to hide the proceeds of dishonest or criminal activity and to try to give the impression that the income is from a legitimate source so that it can be used.
- b) It is often associated with large scale crime such as drug trafficking, terrorist funding and financial crimes involving fraud but the UK legislation also applies to any level of activity used to conceal the source of income to the benefit of the individual. This can be anything from the proceeds of petty theft or from hiding income to commit benefit fraud up to larger corporate crimes which can involve complex and well planned linked transactions.
- c) The Council is at risk of being used in money laundering activity as many of our activities could appear attractive to someone looking to launder money. For example we collect many sources of income including rents (housing and commercial) business rates and council tax. These could be deliberately overpaid, possibly in cash and then a refund requested which would generate a cheque or BACS payment from the Council and provide a legitimate source for the income. Other areas at risk include property deals, either right to buy transactions or larger regeneration/development schemes, partnerships with private sector firms and treasury management activities.
- d) The primary money laundering offences and thus prohibited activities under the POCA are:
 - i. **concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of POCA)** This covers hiding an item or its source, removing serial numbers, or changing an item for something else. For example, an unexplained large cash payment claimed to be from the death of a relative or a lottery win, a person using illegally earned money to buy a house or piece of land; or
 - ii. **entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328 of POCA)** This is the actual involvement in helping to cover up an act – e.g. a Housing Officer becoming suspicious that a tenant on benefits is buying valuable items when they are on limited income and failing to report this; or

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- iii. **acquiring, using or possessing criminal property (section 329 of POCA) [accepting stolen items knowingly or knowingly taking advantage of them or accepting items paid for by the proceeds of crime.** This could be paying significantly less than the value of an item with the suspicion or knowledge that it may be stolen; or
 - iv. **becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorism property (section 18 of the Terrorist Act 2000).** This is about hiding income or other items which are being used to fund or carry out terrorist activities
- e) Criminal Property is defined in Section 340 (3) of the POCA as “property”¹ that is or represents the person’s benefit from illegal actions in whole or part and the person knows or suspects that it is the proceeds of a criminal act.
- f) Potentially any employee could be caught by the money laundering provisions if he/she knows or suspects money laundering and either becomes involved with it in some way and/or does nothing about it. This procedure sets out how any concerns should be raised.

4. Nominated Officer or Money Laundering Reporting Officer (MLRO)

- a) The Council is not obliged to appoint a MLRO, however, it is considered to be best practice to nominate one or more officers to become responsible for their organisations anti money laundering activities. The officers appointed for Nuneaton and Bedworth Borough Council ~~are~~ is the Assistant Director – Finance (the Deputy Section 151 Officer). ~~Executive Director – Resources (the MLRO) and the Head of Audit and Governance (the Deputy MLRO).~~
- b) Section 332 of the POCA concerns the offence of failing to disclose by nominated officers outside of the regulated sector. However, as the above officers have not been formally appointed as MLRO’s under the provisions of sections 337 or 338 of the POCA, they cannot commit this offence.
- c) The role of the MLRO is to be aware of any suspicious activity that might be linked to money laundering, and report it. They’re responsible for:
- Receiving reports of suspicious activity from any employee;
 - Considering all reports and evaluating whether there is, or seems to be, any evidence of money laundering;

¹Defined by Section 340 (9) of POCA - “Property is all property wherever situated and includes-

(a) money;
(b) all forms of property, real or personal, heritable or moveable;
(c) things in action and other intangible or incorporeal property.”

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- Report any suspicious activity or transaction to the National Crime Agency (NCA) by completing a Suspicious Activity Report (SAR);
- Asking the NCA for a defence to a money laundering offence in relation to the transactions they've reported, and making sure that no transactions are continued illegally;
- Putting in place and operating anti money laundering controls and procedures, particularly in areas of high risk;
- Training staff in preventing money laundering and keeping a written record of those employees who have attended the course.

5. Disclosure Procedure

Reporting to the MLRO

- a) Where you know or suspect that money laundering activity is taking/has taken place, or you become concerned that your involvement in a matter which may amount to a prohibited activity under POCA, as defined in paragraph 3 (d) above, you must disclose this as soon as possible to the MLRO or Deputy MLRO.
- b) Your disclosure should be made verbally initially and then followed up by e-mail and the report must include as much detail as possible. As a basic guide try to answer the following six basic questions to make the SAR as useful as possible:
 - Who?
 - What?
 - Where?
 - When?
 - Why?
 - How?

Avoid the use of acronyms or jargon as they may not be understood and may be open to misinterpretation.

- c) Examples of the information that should be provided to the MLRO include:
 - i. Full details of the people involved (including yourself, if relevant), i.e. name, date of birth, nationality, address(es), including postcode;
 - ii. Status of the address i.e. current, previous, home, business and other known property;
 - iii. Subject details, such as National Insurance Numbers, vehicle registration, driving licence, passport, phone numbers (clearly marked home, business, mobile etc.), website addresses;
 - iv. Full details of bank accounts or other financial details (including account numbers etc);

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- v. Type of transaction e.g. cash, debit/credit card, cheque, on-line payment etc.;
- vi. Occupation and name and address of employer;
- vii. Company details, including full legal name and designation (e.g. Limited or plc), VAT number or tax reference number if available, registered number, business/trading address, phone number, email address, website address;
- viii. Trust details including full name, address, nature and type of trust;
- ix. The type(s) of money laundering activity involved; the dates of such activities, including whether the transactions have happened, are ongoing or are imminent;
- x. Where they took place or will take place;
- xi. How they will take place or has taken place; and
- xii. The (likely) amount of money/assets involved.

C1) All available information needs to be given to the MLRO to enable him/her to complete a Suspicious Activity Report (SAR) and report it to the NCA. Once a SAR has been submitted, all employees must remember our obligations not to make any disclosures which might constitute an offence of 'tipping off'. This comes under s333A of POCA and s21D of the Terrorism Act.

C2) Full details of the nature of your involvement and if you are concerned that this would amount to a prohibited act under the POCA (see section 3.4 above for details), then you will need consent from the National Crime Agency (NCA), via the MLRO, to take any further part in the transaction. You should therefore make it clear as to whether there are any deadlines for giving such consent e.g. a completion date or court deadline;

- d) Once you have reported the matter to the MLRO you must follow any directions he/she may give you. You must not make any further enquiries into the matter yourself or raise your concerns with the suspect, even if the NCA has given consent to any particular transaction proceeding. Any necessary investigation will be undertaken by the NCA and all employees will be required to co-operate with them during any subsequent money laundering investigation.
- e) Do not make any reference on a client file to a report having been made to the MLRO – should the client exercise their right to see the file, under Data Protection or Freedom of Information Act, then such a note will obviously tip them off to the report having been made.

Disclosing to the NCA

- a) The MLRO will consider the report and any other available internal information e.g.:
 - other transaction patterns and volumes;
 - the length of any business relationship involved;

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- the number of any one-off transactions and linked transactions; and
- any identification evidence held.

and will then make any other reasonable enquiries as appropriate in order to ensure that all available information is taken into account in deciding whether a report to the NCA is required.

- b) Once the MLRO has evaluated all of the information available, he/she must make a timely determination as to whether:
- there is actual or suspected money laundering taking place; or
 - there are reasonable grounds to know or suspect that is the case; and
 - whether he/she needs to seek consent from the NCA for a particular transaction to proceed.
- c) Where the MLRO concludes a referral is needed then he/she must disclose the matter as soon as practicable to the UKFIU electronically via SAR Online, unless he/she has a reasonable excuse for non-disclosure, for example, if you are a lawyer and you wish to claim legal professional privilege for not disclosing the information. After disclosure has been made no further action should be taken without guidance from the NCA.
- d) Where the MLRO suspects money laundering but has a reasonable excuse for non-disclosure, then he/she must note the report accordingly; he/she can then give their consent in writing for any ongoing or imminent transactions to proceed. In cases where legal professional privilege may apply, the MLRO must liaise with the [Strategic Director – Corporate Resources and the Assistant Director - Democracy and Governance](#) ~~Director – Governance and Recreation~~ to decide whether there is a reasonable excuse for not reporting the matter to the NCA.
- e) Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has specifically given consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.
- f) All information referred to the MLRO and reports made to the NCA must be retained by the MLRO for a minimum of five years.

6. Cash Receipts

- a) Cash sums in excess of £1,000 for any one transaction shall not normally be accepted. Only in exceptional circumstances shall payments in excess of £1,000 be accepted, for example, to secure the tenancy of a property. Cash is defined as including notes, coins or travellers cheques in any currency.

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

7. Customer Due Diligence Checks

- a) Where funds flow through to the Council from a source which it is unfamiliar with or a new business relationship is being formed or a one-off significant transaction is being considered, satisfactory evidence of the identity of the prospective client must be obtained. This applies to existing clients as well as new ones and regular monitoring throughout the life of any ongoing arrangement is also needed to ensure that the identification information remains up-to-date and the section's knowledge of the customer remains current.
- b) Where necessary, the following evidence should be obtained:
 - i. **Individuals** – The proof of identity for an individual should be the best available in the circumstances to identify that they are who they claim to be. They should identify their name, permanent address as well as date and place of birth. E.g. passports, driving licence, utility bills etc
 - ii. **Businesses** – check the identity of companies, partnerships and sole trader businesses by establishing the identity of the entity itself and then the people who are behind it – owners, directors, partners etc. the identity of these individuals' should be established as outlined above. The Assistant Director - Democracy and Governance ~~The Assistant Director – Democracy and Governance~~ can provide details of known directors and group structures for limited companies by requesting a financial report)
 - iii. **Agents** – where a person purports to act on behalf of the customer, confirmation that they are authorised to act on behalf of the customer and verification of their identity must be obtained from a reliable source which is independent of both the customer and the agent.
- c) The evidence should be retained for at least five years from the end of the business relationship or transaction(s).
- d) If satisfactory evidence of identity is not obtained at the outset of the matter then the business relationship or one off transaction(s) cannot proceed any further.
- e) This client identification procedure does not apply to transactions with credit or financial institutions or any other bodies who are subject to the requirements of the money laundering directives or where the customer is a public authority in the United Kingdom.

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

POLICY STATEMENT

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- comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases.

Every employee and Member also has a personal responsibility to be vigilant.

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b) Local authorities and their staff are subject to the full provisions of the Terrorism Act and may commit most of the principal offences under the Proceeds of Crime Act 2002 (the POCA). Public authorities are not, however, legally obliged to apply the provisions of the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and the Money Laundering Regulations 2007. Nevertheless, as responsible public bodies, they have a responsibility for the proper conduct of public business so should embrace and adopt the underlying principles of the money laundering legislation and regulations.

2. Scope of The Framework

a) This policy applies to all Members and employees of the Council and aims to maintain the high standards of conduct, which currently exist within the Council by preventing criminal activity through money laundering.

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

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- c) The Council is at risk of being used in money laundering activity as many of our activities could appear attractive to someone looking to launder money. For example we collect many sources of income including rents (housing and commercial) business rates and council tax. These could be deliberately overpaid, possibly in cash and then a refund requested which would generate a cheque or BACS payment from the Council and provide a legitimate source for the income. Other areas at risk include property deals, either right to buy transactions or larger regeneration/development schemes, partnerships with private sector firms and treasury management activities.
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 - ii. **entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328 of POCA)** This is the actual involvement in helping to cover up an act – e.g. a Housing Officer becoming suspicious that a tenant on benefits is buying valuable items when they are on limited income and failing to report this; or

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- iii. **acquiring, using or possessing criminal property (section 329 of POCA) [accepting stolen items knowingly or knowingly taking advantage of them or accepting items paid for by the proceeds of crime.** This could be paying significantly less than the value of an item with the suspicion or knowledge that it may be stolen; or
 - iv. **becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorism property (section 18 of the Terrorist Act 2000).** This is about hiding income or other items which are being used to fund or carry out terrorist activities
- e) Criminal Property is defined in Section 340 (3) of the POCA as “property”¹ that is or represents the person’s benefit from illegal actions in whole or part and the person knows or suspects that it is the proceeds of a criminal act.
- f) Potentially any employee could be caught by the money laundering provisions if he/she knows or suspects money laundering and either becomes involved with it in some way and/or does nothing about it. This procedure sets out how any concerns should be raised.

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- c) The role of the MLRO is to be aware of any suspicious activity that might be linked to money laundering, and report it. They’re responsible for:
 - Receiving reports of suspicious activity from any employee;
 - Considering all reports and evaluating whether there is, or seems to be, any evidence of money laundering;
 - Report any suspicious activity or transaction to the National Crime Agency (NCA) by completing a Suspicious Activity Report (SAR);

¹Defined by Section 340 (9) of POCA - “Property is all property wherever situated and includes-

(a) money;

(b) all forms of property, real or personal, heritable or moveable;

(c) things in action and other intangible or incorporeal property.”

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- Asking the NCA for a defence to a money laundering offence in relation to the transactions they've reported, and making sure that no transactions are continued illegally;
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5. Disclosure Procedure

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- b) Your disclosure should be made verbally initially and then followed up by e-mail and the report must include as much detail as possible. As a basic guide try to answer the following six basic questions to make the SAR as useful as possible:
 - Who?
 - What?
 - Where?
 - When?
 - Why?
 - How?

Avoid the use of acronyms or jargon as they may not be understood and may be open to misinterpretation.

- c) Examples of the information that should be provided to the MLRO include:
 - i. Full details of the people involved (including yourself, if relevant), i.e. name, date of birth, nationality, address(es), including postcode;
 - ii. Status of the address i.e. current, previous, home, business and other known property;
 - iii. Subject details, such as National Insurance Numbers, vehicle registration, driving licence, passport, phone numbers (clearly marked home, business, mobile etc.), website addresses;
 - iv. Full details of bank accounts or other financial details (including account numbers etc);
 - v. Type of transaction e.g. cash, debit/credit card, cheque, on-line payment etc.;

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- vi. Occupation and name and address of employer;
- vii. Company details, including full legal name and designation (e.g. Limited or plc), VAT number or tax reference number if available, registered number, business/trading address, phone number, email address, website address;
- viii. Trust details including full name, address, nature and type of trust;
- ix. The type(s) of money laundering activity involved; the dates of such activities, including whether the transactions have happened, are ongoing or are imminent;
- x. Where they took place or will take place;
- xi. How they will take place or has taken place; and
- xii. The (likely) amount of money/assets involved.

C1) All available information needs to be given to the MLRO to enable him/her to complete a Suspicious Activity Report (SAR) and report it to the NCA. Once a SAR has been submitted, all employees must remember our obligations not to make any disclosures which might constitute an offence of 'tipping off'. This comes under s333A of POCA and s21D of the Terrorism Act.

C2) Full details of the nature of your involvement and if you are concerned that this would amount to a prohibited act under the POCA (see section 3.4 above for details), then you will need consent from the National Crime Agency (NCA), via the MLRO, to take any further part in the transaction. You should therefore make it clear as to whether there are any deadlines for giving such consent e.g. a completion date or court deadline;

d) Once you have reported the matter to the MLRO you must follow any directions he/she may give you. You must not make any further enquiries into the matter yourself or raise your concerns with the suspect, even if the NCA has given consent to any particular transaction proceeding. Any necessary investigation will be undertaken by the NCA and all employees will be required to co-operate with them during any subsequent money laundering investigation.

e) Do not make any reference on a client file to a report having been made to the MLRO – should the client exercise their right to see the file, under Data Protection or Freedom of Information Act, then such a note will obviously tip them off to the report having been made.

Disclosing to the NCA

- a) The MLRO will consider the report and any other available internal information e.g.:
 - other transaction patterns and volumes;
 - the length of any business relationship involved;
 - the number of any one-off transactions and linked transactions; and
 - any identification evidence held.

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

and will then make any other reasonable enquiries as appropriate in order to ensure that all available information is taken into account in deciding whether a report to the NCA is required.

- b) Once the MLRO has evaluated all of the information available, he/she must make a timely determination as to whether:
- there is actual or suspected money laundering taking place; or
 - there are reasonable grounds to know or suspect that is the case; and
 - whether he/she needs to seek consent from the NCA for a particular transaction to proceed.
- c) Where the MLRO concludes a referral is needed then he/she must disclose the matter as soon as practicable to the UKFIU electronically via SAR Online, unless he/she has a reasonable excuse for non-disclosure, for example, if you are a lawyer and you wish to claim legal professional privilege for not disclosing the information. After disclosure has been made no further action should be taken without guidance from the NCA.
- d) Where the MLRO suspects money laundering but has a reasonable excuse for non-disclosure, then he/she must note the report accordingly; he/she can then give their consent in writing for any ongoing or imminent transactions to proceed. In cases where legal professional privilege may apply, the MLRO must liaise with the Strategic Director – Corporate Resources and the Assistant Director - Democracy and Governance to decide whether there is a reasonable excuse for not reporting the matter to the NCA.
- e) Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has specifically given consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.
- f) All information referred to the MLRO and reports made to the NCA must be retained by the MLRO for a minimum of five years.

6. Cash Receipts

- a) Cash sums in excess of £1,000 for any one transaction shall not normally be accepted. Only in exceptional circumstances shall payments in excess of £1,000 be accepted, for example, to secure the tenancy of a property. Cash is defined as including notes, coins or travellers cheques in any currency.

7. Customer Due Diligence Checks

Nuneaton and Bedworth Borough Council's Anti Money Laundering Framework

- a) Where funds flow through to the Council from a source which it is unfamiliar with or a new business relationship is being formed or a one-off significant transaction is being considered, satisfactory evidence of the identity of the prospective client must be obtained. This applies to existing clients as well as new ones and regular monitoring throughout the life of any ongoing arrangement is also needed to ensure that the identification information remains up-to-date and the section's knowledge of the customer remains current.
- b) Where necessary, the following evidence should be obtained:
 - i. **Individuals** – The proof of identity for an individual should be the best available in the circumstances to identify that they are who they claim to be. They should identify their name, permanent address as well as date and place of birth. E.g. passports, driving licence, utility bills etc
 - ii. **Businesses** – check the identity of companies, partnerships and sole trader businesses by establishing the identity of the entity itself and then the people who are behind it – owners, directors, partners etc. the identity of these individuals' should be established as outlined above. The Assistant Director - Democracy and Governance can provide details of known directors and group structures for limited companies by requesting a financial report)
 - iii. **Agents** – where a person purports to act on behalf of the customer, confirmation that they are authorised to act on behalf of the customer and verification of their identity must be obtained from a reliable source which is independent of both the customer and the agent.
- c) The evidence should be retained for at least five years from the end of the business relationship or transaction(s).
- d) If satisfactory evidence of identity is not obtained at the outset of the matter then the business relationship or one off transaction(s) cannot proceed any further.
- e) This client identification procedure does not apply to transactions with credit or financial institutions or any other bodies who are subject to the requirements of the money laundering directives or where the customer is a public authority in the United Kingdom.

Nuneaton and Bedworth Borough Council

Anti-Fraud, Corruption and Bribery Strategy

1. Introduction

- 1.1 This document sets out the Nuneaton and Bedworth Borough Council's ("the Council") commitment to the prevention, deterrence, detection and investigation of fraud, corruption and bribery. It summarises the responsibilities of members, managers, employees, and others that we deal with and outlines the procedures to be followed where suspicion of an irregularity is raised.

2. Policy Statement

- 2.1. The Council is committed to the prevention, deterrence, detection and investigation of all forms of fraud and corruption, whether these are attempted from within or outside the organisation. The Council operates a zero tolerance on fraud and corruption, all instances will be investigated and the perpetrator(s) will be dealt with in accordance with established policies. Where necessary, the Council will seek to recover the proceeds of any fraudulent activity from identified offenders.
- 2.2. Whilst the general principles outlined in this Strategy apply to all areas of the Council's operations, it should be noted that a [there are](#) specific policy documents ~~is~~ in place in respect of the prevention and detection of benefit fraud ~~and housing tenancy fraud.~~

3. Definitions

Fraud

- 3.1 Fraud is defined ~~by CIPFA~~ as:-
"Dishonestly obtaining a benefit or causing a loss by deception, false representation or abuse of position. ~~When~~ trickery is used to gain a dishonest advantage, which is often financial, over another person.~~the intentional and dishonest distortion of financial statements or other records by persons internal or external to the Council which is carried out to conceal the misappropriation of assets or otherwise for gain"~~

The Fraud Act 2006, ~~which came into effect on 15th January 2007,~~ creates a ~~new~~ general offence of fraud with three ways of committing it:-

- Fraud by false and dishonest representation to make a gain for themselves or another or to cause or expose the risk of loss to another;
- Fraud by failing to disclose information where there is a legal duty to disclose; and intends by failing to disclose make a gain for themselves or another; or to cause or expose the risk of loss to another and
- Fraud by abuse of position with the intention of making a gain for themselves or another or to cause or expose the risk of loss to another.

It also created new offences:-

- Obtaining services dishonestly;
- Possessing, making and supplying articles for use in frauds; and
- Fraudulent trading applicable to non-corporate traders (extends Companies Acts to sole traders etc.).

~~3.2 Typical high risk areas are cash, cheques, credit cards, contracts, income, payments, expense claims, housing benefits, loans, investments, payroll, grants and stores.~~

Theft

3.2 Under the 1968 Theft Act a person shall be guilty of theft if:-
“they dishonestly appropriate property belonging to another with the intention of permanently depriving another of it”.

Possible offences include False Accounting (section 17 Theft Act 1968) and Making off Without Payment (section 3 Theft Act 1978).

3.3 Typical high risk areas for fraud and theft are cash, credit cards, contracts, income, payments, expense claims, housing benefits, loans, investments, payroll and grants.

Corruption

3.4 Corruption is defined ~~by the Audit Commission~~ as:-
“Illegal, bad or dishonest behaviour, especially bribery by people in position of power, for example the offering, giving, soliciting or acceptance of an inducement or reward which may influence a person the to act against the interests of the organization”

- 3.5 Areas of the Council where corrupt practices might be found include the tendering and award of contracts, settlement of contractors' accounts, prejudicial interests of Members, canvassing for appointments, hospitality, award of licenses and disposal of assets.

Bribery

- 3.6 Bribery is defined as:-
“the offering, giving or soliciting of an inducement or reward which may influence a person to perform a function or activity improperly”.
- 3.7 The Bribery Act 2010, ~~which came into force on July 1st 2011,~~ introduced a new anti bribery code and repeals all previous legislation. It created four new offences:
- **Paying bribes** – it is an offence to offer or give financial or other advantage with the intention of inducing a person to perform improperly a relevant function or activity, or to reward a person for the improper performance of such activity or function (section 1);
 - **Receiving bribes** – where a person receives or accepts a financial or other advantage to perform a function or activity improperly. It does not matter whether the recipient of the bribe receives it directly or through a third party, or whether it is for the recipients ultimate benefit (section 2);
 - **Bribery of a foreign official** – this is where a person, directly or through a third party, offers, promises or gives any financial or other advantage to a foreign public official in an attempt to influence them as a public servant and to obtain or retain business, or any other related advantage in the conduct of business (section 6);
 - **A corporate offence of failure to prevent bribery** – a commercial organization could be guilty of bribery where a person associated with the ~~organization~~organisation, such as an employee, agent or even a sub-contractor, bribes another person intending to obtain or retain business for the ~~organization~~organisation or to obtain or retain an advantage in the conduct of business for the ~~organization~~organisation (section 7)
- 3.8 Local authorities are explicitly covered by the offences in sections 1, 2 and 6 but not 7. However, it is the view that as long as the ~~organization~~organisation is incorporated it doesn't matter whether it only pursues charitable, educational or purely public functions and the Act also applies to any incorporated body in which the Council has a significant interest, such as an arms length trading company.

Money Laundering

- 3.9. Money Laundering is defined as:-

“the process by which criminals attempt to conceal the true origin and ownership of the proceeds of criminal activities. If successful, the money can lose its criminal identity and appear legitimate.

- 3.10 The Council has a [separate Anti Money Laundering Framework Policy for dealing with money laundering which is contained in part 4J of the Constitution.](#)

Cyber-Crime

- 3.11 Cyber-crime is any criminal act dealing with computers and networks (called hacking). Additionally, cyber-crime also includes traditional crimes conducted through the Internet

4. Culture

- 4.1 The Council is committed to create an environment that is based on the prevention and detection of fraud, corruption and bribery. This is achieved by promoting a culture of openness and honesty in all Council activities.
- 4.2 The Council’s members, employees and partners play an important role in creating and maintaining this culture and they are expected to be aware of the standards of conduct and the procedures in place to reduce the risk of fraud, corruption and bribery occurring.
- 4.3 The Confidential Reporting Code positively encourages them to raise concerns regarding fraud, corruption and bribery, immaterial of seniority, rank or status, in the knowledge that such concerns will be investigated and wherever possible will be treated in confidence. Suppliers and contractors to the Council and the public also have a part to play in this process and should inform the Council if they feel that fraud, corruption or bribery may have occurred.
- 4.4 The Council will ensure that all reported allegations will be taken seriously and investigated in an appropriate manner.

[4.44.5 The Confidential Reporting Code is contained in Part 5I of the Constitution.](#)

5. Prevention

- 5.1 The role of [Elected Members](#)

- 5.1.1 As elected representatives, all [Elected Members](#) have a duty to the Citizens of the Borough to protect the Council and public money from acts of fraud, corruption and bribery. This is reflected through the adoption of this Anti-Fraud, Corruption and Bribery Strategy and compliance with the Council's Code of Conduct for Members, the Council's Procedure Rules and [Standing Financial Procedure Rules](#) and relevant legislation.
- 5.1.2 Elected [Members](#) undertake to observe the Code of Conduct when they take office to ensure that they undertake their duties in a transparent manner, with consistency and free from allegation of impropriety.
- 5.1.3 [Elected](#) Members are required by law to disclose interests and keep that information up to date. In addition, members are required to disclose their interests at all committee meetings and where the interest is prejudicial, (i.e. it would affect the member's judgment of the public interest) the [Elected Member](#) is required to withdraw from the room while the matter is discussed.
- 5.1.4. Any gifts or hospitality received, with an estimated value of at least £25, which is in any way related to the [Elected Members](#) duties in relation to the Council must be recorded in the gifts and hospitality register. The register is disclosed on the Council's website.

5.2 The role of [Managers](#)

- 5.2.1 Managers are responsible for the communication and implementation of this Strategy within ~~there~~ their work area. They are also responsible for ensuring that adequate systems of internal control exist within their areas of responsibility and that these controls continue to operate effectively so as to prevent and detect fraud, corruption and bribery. When a fraud has taken place managers, in consultation with the [Audit and Governance Manager](#) [Central Midlands Audit Partnership \(CMAP\)](#), will be expected to implement new controls to reduce the risk of a similar fraud occurring again.
- 5.2.2 Managers are responsible for ensuring that employees are aware of the Employee Code of Conduct, Human Resources policies and procedures, Contract Procedure Rules, Financial Procedure Rules and [Standing Orders](#) [Anti Money Laundering Framework](#) and the Fraud Response Plan and that the requirements of each are being met in their everyday business activities.
- 5.2.3 Managers are expected to create an environment in which their employees, contractors and other partners feel able to approach them with any concerns they may have about suspected irregularities. They should refer

to the procedures in the Council's Confidential Reporting Code (whistle blowing policy).

5.2.4 Special arrangements may apply where employees are responsible for cash handling or in charge of systems that generate payments and managers should ensure that written procedures are made available, that relevant training is provided and that a training record is maintained.

5.2.5 The Council ~~recognizes~~ recognises that a key preventative measure in dealing with fraud and corruption is for managers to take effective steps at the recruitment stage to establish, as far as possible, the honesty and integrity of potential employees, whether for permanent, temporary or casual posts and agency employees. The Council's recruitment procedures contain appropriate safeguards in the form of identity checks, written references, verification of qualifications and employment history.

~~5.2.6~~ As in other public bodies, ~~Criminal Records Bureau (CRB)~~ Disclosure and Barring Service (DBS) checks are undertaken for employees carrying out a regulated activity. The Council's Disclosure and Barring Policy provides managers with advice and guidance on when and how to do this. ~~(currently being drafted in consultation with HR)~~

5.3 Responsibilities of employees

5.3.1 Employees are responsible for ensuring that they follow the instructions given to them by managers particularly in relation to the safekeeping of the Council's assets.

5.3.2 We have an Employee Code of Conduct, which sets out minimum standards of conduct. The code gives clear guidance for all employees regarding:

- accountability;
- political neutrality;
- relationships;
- stewardship;
- personal interests;
- whistleblowing;
- treatment of information;
- appointment of staff
- monitoring officer investigations; and
- contractors and partnership agreements.

The code is available in the Council's Constitution ~~on the intranet~~ on its website.

5.3.3 Employees who have access to Housing and Council Tax Benefit information are required to sign a "Benefits Register of Interest". The purpose of this is to act as a safeguard against benefit fraud and to protect the integrity of employees from malicious accusations.

5.3.4 Employees who hold professional, trade or other appropriate qualification are expected to comply with the codes of conduct issued by the ~~organization~~organisation of which they are members. All Council staff must declare any offers of gifts or hospitality in accordance with the Policy and any relevant pecuniary interests, which if known publicly could be perceived to interfere with their independent judgment, ~~must be notified to the Council's Monitoring Officer~~. The register is disclosed on the Council's website.

5.4 Role of internal audit (Central Midlands Audit Partnership)

5.4.1 Internal Audit plays a vital preventative role in ensuring that satisfactory control arrangements exist and are working as management intended. The Finance Procedure Rules state that Internal Audit has authority to:-

- ~~• Enter at all reasonable times on any Council premises or land;~~
- ~~• Have access to all records, documents and correspondence relating to any financial and other transactions of the Council, including those held by a third party, such as contractors;~~
- ~~• Require and receive such explanations as are necessary, concerning any matter under examination;~~
- ~~• Require any employee of the Council to produce cash, stores or any other Council property under their control;~~
- Have Directly access to the Head of Paid Service, the Monitoring Officer, and Elected Members, the Chair of Audit and Standards Committee, Strategic Directors, Assistant Directors and Service ~~enior~~ Managers.
- Have full, free and unrestricted access to all services and functions, premises, assets, employees, elected ~~M~~members, suppliers and contractors, records and other documentation that the ~~Audit~~Chief Auditor & Governance Manager considers necessary to enable the Internal Audit service to fulfil its responsibilities.
- Have authority to access all relevant computer data as part of their work, including that registered under the Data Protection Act.
- Obtain the information and explanations they consider necessary from any employees, partners or agents of the Council to fulfil their objectives and responsibilities.
- Managers must ensure that Internal Audit access is considered when preparing partnership agreements or contracts for the purchase or supply of goods and services.

5.4.2 The National Fraud Initiative (NFI) is led by the ~~Audit Commission~~Cabinet Office as part of the external audit process. NFI seeks to identify fraud and error by comparing data sets across a large number of public bodies. The ~~Audit and Governance Manager~~Assistant Director – Democracy and Governance and Corporate Fraud Officer co-ordinates the Council's NFI data matching requirements and ensures compliance with the ~~Data Protection Act~~legislation. Secure systems are in place to transfer the data and to receive matches back for review. Matches are reviewed using a risk-based approach within the defined timescales.

5.5 Role of external audit

5.5.1 Independent external audit is an essential safeguard to the stewardship of public money. ~~The Council's external auditors will carry out their duties in accordance with the Code of Audit Practice. The Local Audit and Accountability Act 2014 makes the Comptroller and Auditor General responsible for the preparation, publication and maintenance of the Code of Audit Practice. The Code sets out what local auditors are required to do to fulfil their statutory responsibilities under the Act.~~

~~5.5.2 The Code emphasises management's role in preventing and detecting fraud and corruption. It is the external auditor's role to review the Council's arrangements for meeting this responsibility.~~

~~5.6 The Role of the Benefit Fraud Investigation Unit (BFIU)~~

~~5.6.1 We have a dedicated team of fraud investigators who are responsible for investigating potentially fraudulent claims for benefit and for promoting a culture of fraud awareness throughout the council. Where appropriate the BFIU will work with other departments and agencies in order to exchange information that will assist in the prevention and detection of benefit fraud.~~

~~5.7.6~~ **Role of Contractors, Suppliers, Voluntary Bodies, Agencies and the Public**

~~5.7.16.1~~ The Council is committed to the highest possible standards of openness, probity and accountability and encourages those that we deal with who have any concerns about any aspect of the Council's work to come forward and voice those concerns. The process for raising concerns is set out in the Council's Confidential Reporting Code (whistleblowing policy).

~~5.7.2 A benefit fraud hotline (0800 389 3537) has been set up to help raise public awareness of benefit fraud, the hotline is advertised in all Council buildings and community centres throughout the borough.~~

6 Deterrence

~~6.1 Benefit Fraud Prosecution Policy~~

~~6.1.1 To assist in the prevention and deterrence of fraud the Council has adopted a prosecution policy in respect of Housing and Council Tax Benefit fraud.~~

~~6.1.2 The policy statement adopted by the Council is as follows:~~

~~'The Council is committed to the prevention and deterrence of benefit fraud. Where a person has been accused of committing Housing and/or Council Tax Benefit fraud and there is sufficient evidence to sustain a prosecution, the Council will in the first instance consider:~~

- ~~• whether it is in the public interest to prosecute the offender; and~~
- ~~• whether any of the alternatives to prosecution would be more appropriate."~~

~~The alternatives to prosecution available are:~~

- ~~• to issue a Local Authority Caution~~
- ~~• to offer an Administrative Penalty'.~~

6.26.1 Disciplinary Procedures

6.1.1 Theft, fraud, corruption and bribery are serious offences and employees will face disciplinary action if there is evidence that they have been involved in these activities, ~~this includes benefit fraud~~. The Council has a Dismissal and Disciplinary Policy, which is available on the Intranet. In relation to employees, disciplinary action will be taken in addition to, or instead of criminal proceedings, depending on the circumstances of each individual case.

6.1.2 Members could face appropriate action ~~under this policy~~ if they are found to have been involved in fraud, ~~and~~ corruption ~~or bribery against the Authority~~. Action will be taken in addition to, or instead of criminal proceedings, depending on the circumstances of each individual case. If the matter is a potential breach of the Code of Conduct for Members then the matter shall be referred to the Monitoring Officer.

6.32 Gifts and Hospitality Policy

~~6.3.12.1~~ The Council has adopted a Gifts and Hospitality Policy, which applies to Members and Officers. This makes it clear that gifts and hospitality must not be accepted unless the person concerned is sure that the nature and value will not attract public criticism. All offers of gifts and hospitality must be recorded in the register held by the Monitoring Officer, which is available on the Council's website.

7. Detection and Investigation

- 7.1.1 There are numerous systems and management controls in place to deter fraud, corruption and bribery, but it is often the vigilance of employees, members, partners, suppliers, contractors and the public that aids detection. Frauds are often discovered by chance or “tip-off” and arrangements are in place to enable such information to be properly dealt with.
- 7.1.2 Depending upon the nature of the allegation, the ~~Audit and Governance Manager~~[Central Midlands Audit Partnership in conjunction with the Statutory Officers](#) will work with ~~Directors and Service~~ ~~Managers~~ to decide on the most appropriate course of action. Any decision to bring in the Police because of the nature of an allegation will be taken by the [Head of Paid Service, Section 151 Officer, Monitoring Officer and Managing Director or the relevant Strategic Director](#), in consultation with the ~~Audit and Governance Manager~~[Chief Auditor](#). If the Police are involved any disciplinary investigation will be suspended and will only continue with the permission of the Police.
- 7.1.3 Any control weaknesses identified during the course of an investigation must be reported to the relevant manager and, in consultation with the ~~Audit and Governance Manager~~[Statutory Officer Group](#), improvements will be made to ensure that there is no opportunity for further fraud, corruption or bribery.
- 7.1.4 The Fraud Response Plan reinforces the Council’s robust approach by setting out the ways in which concerns about suspected fraud, corruption or bribery should be reported and how they will be dealt with. ~~The Plan does not cover advice in respect of instances of suspected cases of Housing and Council Tax Benefit fraud. These will be investigated by the Benefits Investigation Unit and all such instances should be reported directly to Senior Investigations Officer or the Benefit fraud hotline 0800 389 3537.~~
- 7.1.5 The Confidential Reporting Code encourages employees who have serious concerns about any aspect of the Councils work to come forward and voice those concerns. It is recognised and accepted that these will be investigated in a confidential manner
- ~~7.1.6 All instances of suspected Housing and/or Council Tax Benefit fraud will be investigated by the Benefit Fraud Investigation Unit (BFIU). The BFIU has a reactive and proactive approach to the investigation of benefit fraud, and will use the full range of legislative powers available to them.~~

- 7.1.7 The Council will always seek to recover any losses incurred as a result of fraud, corruption or bribery, wherever this is practical, including the use of [civic-civil](#) law if appropriate.

8 Training

- 8.1 A lack of procedural guidance and training for managers and auditors in prevention, detection and investigation of fraud can lead to inefficient handling of fraud issues. Fraud awareness training for managers and employees involved in internal control systems is an effective measure in establishing an anti-fraud culture. This can be linked with training and awareness of other key documents such as the Confidential Reporting Code and Anti-Money Laundering Procedures.
- 8.2 The Council recognises that the success of this strategy and its general credibility will depend largely on the effectiveness of communication, programmed training and responsiveness of employees throughout the Authority, combined with a commitment from the Council.

9 Conclusion

- 9.1 The Council has in place a clear network of systems and procedures to assist in dealing with fraud and corruption. It is determined that these arrangements will keep pace with any future developments in both preventative and detection techniques regarding fraudulent or corrupt activity that may affect its operation. ~~The Audit and Governance Manager will maintain a continuous overview of the arrangements in place.~~
- 9.2 If members, managers or employees are unsure of the appropriate action to take in relation to the information contained within this Strategy should contact the [Audit and Governance Manager](#)[Monitoring Officer](#) and the [Chief Auditor](#) for guidance.

Nuneaton and Bedworth Borough Council

Anti-Fraud, Corruption and Bribery Strategy

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5. Prevention

5.1 The role of Elected Members

- 5.1.1 As elected representatives, all Elected Members have a duty to the Citizens of the Borough to protect the Council and public money from acts of fraud, corruption and bribery. This is reflected through the adoption of this Anti-Fraud, Corruption and Bribery Strategy and compliance with the Council's Code of Conduct for Members, the Council's Procedure Rules and Financial Procedure Rules and relevant legislation.
- 5.1.2 Elected Members undertake to observe the Code of Conduct when they take office to ensure that they undertake their duties in a transparent manner, with consistency and free from allegation of impropriety.

5.1.3 Elected Members are required by law to disclose interests and keep that information up to date. In addition, members are required to disclose their interests at all committee meetings and where the interest is prejudicial, (i.e. it would affect the member's judgment of the public interest) the Elected Member is required to withdraw from the room while the matter is discussed.

5.1.4. Any gifts or hospitality received, with an estimated value of at least £25, which is in any way related to the Elected members duties in relation to the Council must be recorded in the gifts and hospitality register. The register is disclosed on the Council's website.

5.2 The role of Managers

5.2.1 Managers are responsible for the communication and implementation of this Strategy within their work area. They are also responsible for ensuring that adequate systems of internal control exist within their areas of responsibility and that these controls continue to operate effectively so as to prevent and detect fraud, corruption and bribery. When a fraud has taken place managers, in consultation with the Central Midlands Audit Partnership (CMAP), will be expected to implement new controls to reduce the risk of a similar fraud occurring again.

5.2.2 Managers are responsible for ensuring that employees are aware of the Employee Code of Conduct, Human Resources policies and procedures, Contract Procedure Rules, Financial Procedure Rules and Anti Money Laundering Framework and the Fraud Response Plan and that the requirements of each are being met in their everyday business activities.

5.2.3 Managers are expected to create an environment in which their employees, contractors and other partners feel able to approach them with any concerns they may have about suspected irregularities. They should refer to the procedures in the Council's Confidential Reporting Code (whistleblowing policy).

5.2.4 Special arrangements may apply where employees are responsible for cash handling or in charge of systems that generate payments and managers should ensure that written procedures are made available, that relevant training is provided and that a training record is maintained.

5.2.5 The Council recognises that a key preventative measure in dealing with fraud and corruption is for managers to take effective steps at the recruitment stage to establish, as far as possible, the honesty and integrity of potential employees, whether for permanent, temporary or casual posts and agency employees. The Council's recruitment procedures contain

appropriate safeguards in the form of identity checks, written references, verification of qualifications and employment history.

- 5.2.6 As in other public bodies, Disclosure and Barring Service (DBS) checks are undertaken for employees carrying out a regulated activity. The Council's Disclosure and Barring Policy provides managers with advice and guidance on when and how to do this.

5.3 Responsibilities of employees

- 5.3.1 Employees are responsible for ensuring that they follow the instructions given to them by managers particularly in relation to the safekeeping of the Council's assets.

- 5.3.2 We have an Employee Code of Conduct, which sets out minimum standards of conduct. The code gives clear guidance for all employees regarding:

- accountability;
- political neutrality;
- relationships;
- stewardship;
- personal interests;
- whistleblowing;
- treatment of information;
- appointment of staff
- monitoring officer investigations; and
- contractors and partnership agreements.

The code is available in the Council's Constitution on its website.

- 5.3.3 Employees who have access to Housing and Council Tax Benefit information are required to sign a "Benefits Register of Interest". The purpose of this is to act as a safeguard against benefit fraud and to protect the integrity of employees from malicious accusations.

- 5.3.4 Employees who hold professional, trade or other appropriate qualification are expected to comply with the codes of conduct issued by the organisation of which they are members. All Council staff must declare any offers of gifts or hospitality in accordance with the Policy and any relevant pecuniary interests, which if known publicly could be perceived to interfere with their independent judgment. The register is disclosed on the Council's website.

5.4 Role of internal audit (Central Midlands Audit Partnership)

5.4.1 Internal Audit plays a vital preventative role in ensuring that satisfactory control arrangements exist and are working as management intended. The Finance Procedure Rules state that Internal Audit has authority to:-

- Have direct access to the Head of Paid Service, the Monitoring Officer, Elected Members, the Chair of Audit and Standards Committee, Strategic Directors, Assistant Directors and Service Managers.
- Have full, free and unrestricted access to all services and functions, premises, assets, employees, elected members, suppliers and contractors, records and other documentation that the Chief Auditor considers necessary to enable the Internal Audit service to fulfil its responsibilities.
- Have authority to access all relevant computer data as part of their work, including that registered under the Data Protection Act.
- Obtain the information and explanations they consider necessary from any employees, partners or agents of the Council to fulfil their objectives and responsibilities.
- Managers must ensure that Internal Audit access is considered when preparing partnership agreements or contracts for the purchase or supply of goods and services.

5.4.2 The National Fraud Initiative (NFI) is led by the Cabinet Office. NFI seeks to identify fraud and error by comparing data sets across a large number of public bodies. The Assistant Director – Democracy and Governance and Corporate Fraud Officer co-ordinates the Council's NFI data matching requirements and ensures compliance with the data protection legislation. Secure systems are in place to transfer the data and to receive matches back for review. Matches are reviewed using a risk-based approach within the defined timescales.

5.5 Role of external audit

5.5.1 Independent external audit is an essential safeguard to the stewardship of public money. . The Local Audit and Accountability Act 2014 makes the Comptroller and Auditor General responsible for the preparation, publication and maintenance of the Code of Audit Practice. The Code sets out what local auditors are required to do to fulfil their statutory responsibilities under the Act.

5.6 Role of Contractors, Suppliers, Voluntary Bodies, Agencies and the Public

5.6.1 The Council is committed to the highest possible standards of openness, probity and accountability and encourages those that we deal with who

have any concerns about any aspect of the Council's work to come forward and voice those concerns. The process for raising concerns is set out in the Council's Confidential Reporting Code (whistleblowing policy).

6 Deterrence

6.1 Disciplinary Procedures

6.1.1 Theft, fraud, corruption and bribery are serious offences and employees will face disciplinary action if there is evidence that they have been involved in these activities. The Council has a Dismissal and Disciplinary Policy, which is available on the Intranet. In relation to employees, disciplinary action will be taken in addition to, or instead of criminal proceedings, depending on the circumstances of each individual case.

6.1.2 Members could face appropriate action if they are found to have been involved in fraud, corruption or bribery. Action will be taken in addition to, or instead of criminal proceedings, depending on the circumstances of each individual case. If the matter is a potential breach of the Code of Conduct for Members then the matter shall be referred to the Monitoring Officer.

6.2 Gifts and Hospitality Policy

6.2.1 The Council has adopted a Gifts and Hospitality Policy, which applies to Members and Officers. This makes it clear that gifts and hospitality must not be accepted unless the person concerned is sure that the nature and value will not attract public criticism. All offers of gifts and hospitality must be recorded in the register held by the Monitoring Officer, which is available on the Council's website.

7. Detection and Investigation

7.1.1 There are numerous systems and management controls in place to deter fraud, corruption and bribery, but it is often the vigilance of employees, members, partners, suppliers, contractors and the public that aids detection. Frauds are often discovered by chance or "tip-off" and arrangements are in place to enable such information to be properly dealt with.

7.1.2 Depending upon the nature of the allegation, the Central Midlands Audit Partnership in conjunction with the Statutory Officers will work with Directors and Service Managers to decide on the most appropriate course of action. Any decision to bring in the Police because of the nature of an allegation will be taken by the Head of Paid Service, Section 151 Officer, Monitoring Officer and Strategic Director, in consultation with the Chief

Auditor. If the Police are involved any disciplinary investigation will be suspended and will only continue with the permission of the Police.

- 7.1.3 Any control weaknesses identified during the course of an investigation must be reported to the relevant manager and, in consultation with the Statutory Officer Group, improvements will be made to ensure that there is no opportunity for further fraud, corruption or bribery.
- 7.1.4 The Fraud Response Plan reinforces the Council's robust approach by setting out the ways in which concerns about suspected fraud, corruption or bribery should be reported and how they will be dealt with.
- 7.1.5 The Confidential Reporting Code encourages employees who have serious concerns about any aspect of the Councils work to come forward and voice those concerns. It is recognised and accepted that these will be investigated in a confidential manner
- 7.1.7 The Council will always seek to recover any losses incurred as a result of fraud, corruption or bribery, wherever this is practical, including the use of civil law if appropriate.

8 Training

- 8.1 A lack of procedural guidance and training for managers and auditors in prevention, detection and investigation of fraud can lead to inefficient handling of fraud issues. Fraud awareness training for managers and employees involved in internal control systems is an effective measure in establishing an anti-fraud culture. This can be linked with training and awareness of other key documents such as the Confidential Reporting Code and Anti-Money Laundering Procedures.
- 8.2 The Council recognises that the success of this strategy and its general credibility will depend largely on the effectiveness of communication, programmed training and responsiveness of employees throughout the Authority, combined with a commitment from the Council.

9 Conclusion

- 9.1 The Council has in place a clear network of systems and procedures to assist in dealing with fraud and corruption. It is determined that these arrangements will keep pace with any future developments in both preventative and detection techniques regarding fraudulent or corrupt activity that may affect its operation.

- 9.2 If members, managers or employees are unsure of the appropriate action to take in relation to the information contained within this Strategy should contact the Monitoring Officer and the Chief Auditor for guidance.

AGENDA ITEM NO. 11

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Audit and Standards Committee

Date of Meeting: 17th March 2026

Subject: Fraud Response Plan and Partnership Framework

Portfolio: Not Applicable

Responsible Officer: Assistant Director – Democracy and Governance
Assistant Director – Finance

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Strive for transparency and accountability, in all that we do. Increase public scrutiny.
and
Set ambitious and challenging budgets, to ensure taxpayers money is respected, and high-quality services are delivered.

Ward Relevance: All

Public or Private: Public

Forward Plan: No

Subject to Call-in: No

1. Purpose of report

- 1.1. To provide the Audit and Standards Committee with the reviewed Fraud Response Plan and Partnership Framework for consideration and approval.

2. Recommendations

- 2.1. That the revised Fraud Response Plan be approved; and
2.2. That the revised Partnership Framework be approved.

3. Background

- 3.1. Both the Fraud Response Plan and Partnership Framework is in need of a review and refresh to ensure they are both up to date and reflect the organisation structure and governance processes.
 - 3.2. The Assistant Director – Democracy and Governance proposed as part of the Audit and Standards Work Programme for the 2025/2026 Municipal Year, a review and refresh of the Fraud Response Plan and Partnership Framework to ensure it reflects the current position of the Council.
4. Body of report and reason for recommendations
- 4.1. Fraud Response Plan
 - 4.1.1. The Fraud Response Plan supports the Council's Anti-Fraud, and Corruption and Bribery Strategy (Part 4I of the Constitution) by reinforcing the Council's robust approach by setting out the ways in which concerns about suspected fraud or corruption should be reported and how they will be dealt with.
 - 4.1.2. The purpose of the Plan is to maintain the high standards of conduct and outline the clear responsibilities in respect of fraud and corruption.
 - 4.1.3. The Plan includes the following sections:
 - 4.1.3.1. Introduction
 - 4.1.3.2. The Fraud Environment
 - 4.1.3.3. Responsibilities in respect of fraud and corruption
 - 4.1.3.4. Procedures for reporting suspected fraud
 - 4.1.3.5. When a concern has been raised
 - 4.1.3.6. Investigation of Fraud
 - 4.1.3.7. Computer Forensic Investigation
 - 4.1.3.8. References for employees disciplined or prosecuted for fraud
 - 4.1.3.9. Further Guidance
 - 4.1.3.10. Appendix 1 - Fraud Indicators
 - 4.1.4. The changes include minor amendments to wording to better align with Human Resource policy as well as personnel and job title changes. Appendix A shows the tracked change version for consideration.
 - 4.2. Partnership Framework
 - 4.2.1. The purpose of the Partnership Framework is to produce guidance to officers to support the planning and delivery of effective partnership working and to ensure that any partnerships we are involved in are managed with appropriate governance arrangements. It contains advice on what should be taken into consideration when entering into a new partnership or

reviewing an existing one as fit for purpose. The framework therefore includes a range of considerations in terms of approval, governance, information sharing and scrutiny. The framework has an appendix (Appendix 1 – Partnership Scorecard) which helps support pre-approval process in terms of the benefit, risk and implications associated with a partnership to support the decision making process.

4.2.2. The Framework includes the following sections:

- 4.2.2.1. Background
- 4.2.2.2. What is a Partnership
- 4.2.2.3. Deciding on the need for a Partnership
- 4.2.2.4. Classifying the Significance of a Partnership
- 4.2.2.5. Approval
- 4.2.2.6. Corporate Governance Arrangements
- 4.2.2.7. Scrutiny Arrangements
- 4.2.2.8. Information sharing and data management
- 4.2.3. Equality and diversity

4.2.4. The changes are minor and relate to staff personnel and job titles as well as updates to reflect the council's governance arrangements. Appendix C provides the tracked changed version. For the avoidance of any doubt, Appendix 1 relates to the Partnership Framework as it acts as a scorecard.

5. Consultation with the public, members, officers and associated stakeholders

5.1. A Consultation process was undertaken by the Assistant Director – Democracy and Governance internally towards the end of the 2025 calendar year. This was directed to Senior Leadership Team. All feedback received was incorporated into the revised documents which was then approved internally by Senior Leadership Team 20th January 2026.

6. Financial Implications

6.1. No direct financial implications related to the adoption of either revised document.

7. Legal Implications

7.1. No direct legal implications related to the adoption of either revised document.

8. Equalities implications

8.1. A review has been undertaken and it has been identified that no assessment is required following consultation and liaison with the appropriate officer.

9. Health implications

9.1. No direct health implications related to the adoption of either revised document.

10. Climate and environmental implications

10.1. No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1. No direct risk management implications have been identified, but the two documents support identification and mitigation of risk.

13. Human resources implications

13.1. No direct human resource implications have been identified other than any implications and/or responsibilities included within either document.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Due to changes in job titles and/or organisation structure and arrangements. Therefore, failing to update, causes confusion and ambiguity as the documents wouldn't be up to date and/or refreshed.

15. Conclusion

15.1. In summary, the revised Fraud Response Plan and Partnership Framework reflects the current organisation structure and governance. The Audit and Standards Committee is therefore invited to consider and approve both revised documents. In doing so, it ensures that the Council's governance arrangements remain fit for purpose and aligned with the principles of good governance that underpin public trust and organisational safeguards.

16. Appendices

16.1. Please note the following appendices:

- i. Appendix A – NBBC Fraud Response Plan 2026 – Tracked Changes
- ii. Appendix B – NBBC Fraud Response Plan 2026 – Clean Version
- iii. Appendix C – Partnership Framework 2026 – Tracked Changes
 - a. Incorporating Appendix 1 – Partnership Framework
- iv. Appendix D – Partnership Framework 2026 – Clean Version
 - a. Incorporating Appendix 1 – Partnership Framework

17. Background papers

17.1. Please note there are no background papers attached to this report.

18. Report Writer Details:

Officer Job Title: Assistant Director – Democracy and Governance

Officer Name: Matthew Wallbank

Nuneaton and Bedworth Borough Council

~~Draft~~ Fraud Response Plan ~~2008~~2025

1. Introduction

Nuneaton and Bedworth Borough Council is committed to the highest possible standards of openness, probity and accountability.

In line with this commitment, the Council's Anti-Fraud ~~and~~ Corruption ~~and Bribery~~ Strategy (Part 4I of the Constitution) outlines the principles we are committed to in relation to preventing, deterring and detecting fraud and corruption.

This Fraud Response Plan reinforces the Council's robust approach by setting out the ways in which concerns about suspected fraud or corruption should be reported and how they will be dealt with.

~~This Fraud Response Plan does not cover advice in respect of instances of suspected cases of Housing and Council Tax Benefit fraud. These will be investigated by the Benefits Investigation Unit and all such instances should be reported directly to the Senior Investigations Officer or the Benefit fraud hotline 0800 389 3537.~~

2. The fraud environment

2.1 The environmental factors that will allow fraud to occur fall under two main categories – operational and personal. Practical examples of these factors are:

Operational factors:

- lack of a robust control environment;
- undocumented procedures;
- failure of management information systems;
- employees required to carry out duties which exceed their ~~capabilities~~job requirements;
- staff shortages at ~~management~~any level;
- lax attitude to security.

Personal factors:

- personal financial problems;
- personal character traits – greed;
- pressure/coercion exerted by a third party;
- kudos from demonstrating the ability to ~~beat~~beat the system.

- 2.2 Fraud tends to occur where the following characteristics are prevalent:

means + motive + opportunity = fraud, where

means = knowledge of job/systems in operation
motive = personal circumstances of the employee
opportunity = operational/control weaknesses.

3. Responsibilities in respect of fraud and corruption

- 3.1 Managing the risk of fraud and corruption is the responsibility of management. Audit procedures alone, even when performed with due professional care, cannot guarantee that fraud and corruption will be detected. Internal Audit does not have responsibility for the prevention or detection of fraud and corruption. Internal auditors should however, be alert to risks and exposures that could allow fraud or corruption to occur.
- 3.2 It is vital that management at all levels are alert to potential problems in their work area and that adequate and effective safeguards are in place to prevent irregularities taking place. However, managers should also satisfy themselves that sufficient procedures are in place, so that in the event of a breach, any irregularity would be identified promptly, so minimising any loss to the authority. Internal audit can provide advice and assistance in this area. Appendix A provides a list of the warning signs that may indicate that a fraud is taking place.

4. Procedures for reporting suspected fraud

- 4.1 ~~In accordance with Financial Procedure Rule 17.4,~~ it is the responsibility of all employees to notify their Assistant Director, Service ~~Head~~ Manager, Strategic Director or ~~the~~ Chief Finance Officer immediately of any suspected fraud, irregularity or misappropriation of the Council's assets. Any Assistant Director, Service Head Manager or Strategic Director ~~Assistant Director or Service Head~~ becoming aware of any such irregularity shall immediately notify the Chief Finance Officer.
- 4.2 Employees play an important role in detecting fraud and corruption. They may have suspicions about colleagues they work with or those in different sections whose work they deal with. All employees should be encouraged to discuss their concerns with line management if they suspect financial irregularities are occurring.
- 4.3 The Council has a Confidential Reporting Code ("whistle-blowing" policy contained in Part 5I of the Constitution), the aim of which is to provide guidance to employees who have serious concerns about

practices that are contrary to the rules, regulations and legislation covering Council activities. The Code details how they should report these concerns, so that appropriate action can be taken.

- 4.4 The Council's Complaints procedure provides an avenue through which the public can raise concerns about suspected cases of fraud and corruption.

5. When a concern has been raised

- 5.1 Where employee fraud is involved, the ~~Assistant Strategic or Assistant Director~~ should ~~take the following steps:~~

~~in consultation with a senior member of the Organisational Development & Personnel Section/the Human Resources team; to~~ decide whether any employee(s) involved should be suspended in accordance with the Council's disciplinary procedures. ~~If a decision is taken to suspend the employee, the timing is critical in preventing the destruction or removal of evidence. In these circumstances, the suspect(s) should be approached unannounced and supervised at all times before being escorted off the Authority's premises. They should be allowed to collect personal property, but should not be able to remove any property belonging to the Authority. Any security passes, mobile phones, laptops or tablets and keys should be returned and IT should be instructed to withdraw access permissions to all authority computer systems immediately.~~

- ~~No action under the disciplinary procedure should normally start until the preliminary investigation has been completed and the report has been submitted. (This does not preclude precautionary suspension, which is not disciplinary action and carries no implication of guilt).~~

- 5.2 In respect of member fraud, the ~~Assistant Strategic or Assistant Director~~ should consult with the Monitoring Officer, ~~Chief Finance Officer~~ or Chief Executive ~~Officer Managing Director~~ as to the best way to proceed, ~~in consultation with the Chief Auditor.~~

- 5.3 The ~~Head of Internal Audit/Audit and Governance Manager/Chief Auditor~~ ~~must~~ be notified of any suspected irregularity so that processes and procedures can be reviewed to prevent any further irregularities occurring. ~~Any allegation regarding persons not employed by the Council should be reported to the Risk Management and Insurance Officer who will provide insurance advice if needs be.~~

6. Investigation of Fraud

6.1 Who should carry out the investigation?

The ~~Assistant Strategic or Assistant~~ Director, in consultation with the ~~Chief Finance Officer~~ Human Resources team, shall appoint an investigating officer and the investigation shall be conducted inline with the Council's disciplinary procedures. ~~This will normally be the Head of Internal Audit, particularly if the allegation is of a serious nature or if there is some form of financial irregularity. The investigating officer will be advised and accompanied by a representative from the Organisational Development & Personnel Section.~~ Human Resources team if the investigation is carried out formally. If the investigation is informal the investigating officer will not be supported. Wherever possible, the problem should always be dealt with informally in the first instance.

If the allegation relates to theft of Council assets by persons not employed by the Council, the matter may be referred to the Police. There should be no need for internal audit involvement in these cases, other than to advise on security of assets. Such losses will need to be reported to the Council's insurers to support and future claims and it may be necessary to report the matter to the Police to obtain a crime number.

6.2 Managing the investigation

Any internal investigation should be carried out with great care and with due consideration of the possibility of future criminal proceedings.

In order to maximise the effectiveness of fraud investigations it is crucial that clear objectives are set at the earliest opportunity. At the highest level, the objectives will be to:-

- establish the facts;
- prevent repetition and deter others; and
- recover any loss to the Council.

Investigations into suspected irregularities should be conducted in a timely and professional manner.

It is important from the outset of an investigation to maintain a chronological log of events. This log should record all details of telephone calls, documents obtained, interviews conducted and any other details that arise, however trivial. This is evidence of the way in which the investigation was conducted, which may be challenged at a disciplinary or criminal hearing.

There is a need to maintain confidentiality and all employees engaged in fraud investigations need to bear this in mind. All relevant legislation,

such as [Data Protection Act](#), Human Rights Act, Regulation of Investigatory Powers Act, Police and Criminal Evidence Act etc., must be complied with at all times.

Where a Police investigation is taking place concurrently with an internal investigation, the requirements of the Police investigation will take precedence over the internal investigation.

Requests for information from anyone outside of the Council, particularly the press, should be referred directly to the Chief Executive [Officer](#) or the appropriate Director ([Strategic or Assistant](#)). The investigating officer should make no comment as any release of information could seriously prejudice the investigation and any future disciplinary or criminal proceedings.

Where the loss is substantial, legal advice should be obtained about the need to freeze the suspect's assets through the court, pending conclusion of the investigation. Legal advice should also be obtained about the prospects of recovering losses through the civil court, where the perpetrator refuses repayment. The authority will normally expect to recover costs in addition to losses.

6.3 Gathering evidence

For the purposes of criminal proceedings, the admissibility of evidence is governed by the Police and Criminal Evidence Act 1984 (PACE). For non-criminal proceedings, i.e. civil or disciplinary hearings, PACE does not apply, but should be regarded as best practice.

At the start of the investigation, it is important that original records and documents are obtained as soon as possible. These must be marked with where, when and from whom they were obtained as this evidence trail may be required if fraud is proven. When the original document is not available, for example because it has been microfilmed and destroyed, a hardcopy should be taken and it should be certified as being a true copy of the original.

Individual documents should be ~~placed in clear plastic wallets in order to retain~~[ed them](#) in their original state. Original documents must not be marked as this could later allow the veracity of the document to be called into question.

If the investigation involves the misuse or loss of cash, stores or other physical assets, a count must be completed to determine the actual value or quantity present at a fixed point in time. The count must be completed by at least two employees to prevent any suggestion that the evidence has been tampered with.

During the initial stages of the investigation, it may become evident that the full extent of the crime is more serious than initially thought. In these instances, it may be necessary to reconsider the need to suspend the suspect(s).

It may be necessary to investigate systems other than those involved in the original suspicion, as the suspect may have had opportunities to misappropriate Council's assets by other means and it is important to identify the full details of the fraud.

6.4 Interviewing

As the investigation develops there will be matters arising that can only be substantiated or clarified by interview. All employees, not just suspect(s), who may be able to assist with the investigation, should be interviewed to allow a full picture of events to be compiled. The interview process shall be undertaken in accordance with the Disciplinary Policy.

~~These fact finding interviews will generally be of a formal nature comprising a number of predetermined questions. The questions should be designed to elicit the relevant facts from the interviewee, leading questions should not be asked.~~

The interviews will be undertaken by the investigating officer and a representative from the Organisational Development & Personnel Section Human Resources unless informal interview is deemed appropriate by the investigating officer. At the start of the interview, it should be made clear to the interviewee that the purpose of the interview is to establish the facts and that it is not part of a disciplinary process. Similarly, representatives who accompany the interviewee should be told that their role is to act as an observer to ensure that the interview is conducted fairly and that they must not answer on behalf of the interviewee.

~~Where the interview continues for any length of time or where the interviewee shows signs of distress consideration should be given to offer a comfort break or suspend the interview.~~

~~At the end of the interview it is worth including a question which allows the interviewee to make any comments he or she wishes to make. When the interview is complete, a hardcopy of the questions and answers should be given to the interviewee to sign and make comment.~~

Criminal cases are referred to and investigated by the Police and their interviews have to comply with the Police and Criminal Evidence Act (PACE). Failure to comply with PACE means that nothing said by the

suspect during the interview will be admissible in a court of law. Therefore, before interviewing the suspect as part of an initial investigation, consideration must be given to the sufficiency of evidence obtained to date and the likelihood of securing a criminal conviction. If there is a likelihood then the case must be referred to the Police for them to continue with the investigation.

~~All employees have the right to trade union representation or to have a friend or work colleague accompany them when being interviewed. To give them sufficient time to arrange suitable representation it is recommended that at least 5 working days notice must be given of the interview.~~ In the case of gross misconduct, the seriousness of the allegation may require the individual to be interviewed immediately and in such cases, no notice will be given. The employee should however be given the opportunity to get representation but if this is not possible the interview should go ahead without it.

6.5 Reporting the findings

When an investigation has been concluded, a report should be compiled ~~which encompasses the following information:-~~
~~the objectives of the investigation;~~
~~the officers interviewed;~~
~~details of the evidence gathered including a sequence of events;~~
~~any restrictions in the scope of the investigation;~~
~~the conclusions reached from the evidence gathered;~~
~~a recommended course of action.~~

A separate report may be required outlining the system weaknesses that allowed the fraud to be perpetrated, with recommendations to address these.

A written report should normally be drafted at the end of the investigation but it may be necessary to compile interim reports on the progress of the investigation if it exceeds a month in duration. This may just be an e-mail to the ~~Assistant Strategic or Assistant~~ Director ~~and Chief Finance Officer~~ keeping them up-to-date with progress.

The final written report should be addressed to the ~~Assistant Strategic or Assistant~~ Director ~~and Chief Finance Officer~~ and possibly the ~~appropriate Director~~ and Chief Executive ~~Officer~~ if the fraud is serious.

On receipt of the final report, the evidence presented will be considered to establish whether there is a need for legal proceedings or disciplinary action.

6.6 Involving the Police following an internal investigation

Liaison with the Police should begin as soon as it is clear that a [fraud criminal offence](#) has been committed. The decision to involve the ~~P~~olice will include the following considerations:

- prosecution of the perpetrators through criminal action;
- potential seriousness of the malpractice involved;
- whether the malpractice is fraudulent;
- whether the malpractice is thought to be continuing;
- involvement of individuals or organisations outside the authority;
- need to take deterrent action; and
- adverse publicity.

The Police should only be contacted with details of a suspected fraud once approval has been obtained from the [appropriate Strategic or Assistant Director, Head of Paid Service Chief Executive Officer, and the Monitoring Officer and the Chief Finance Officer.](#)

7 Computer Forensic Investigation

- 7.1 The growth of e-government has meant that fraud, theft, irregularity, improper use or misappropriation of the Council's assets increasingly involves electronic media. The act of securing and investigating electronic evidence is extremely difficult and must be undertaken properly and to the highest scientific and professional standards.
- 7.2 Do not be tempted to investigate yourself, many well-meaning employees have fallen into this trap and have contaminated or destroyed digital evidence. Failure to secure evidence in line with current best practice could rule the evidence inadmissible in court. Therefore, always seek help from a computer forensic specialist. If the computer is switched off then leave it switched off, if it is switched on then do not interact with it.

8. References for employees disciplined or prosecuted for fraud

- 8.1 Any request for a reference for an employee who has or is in the process of being disciplined or has been successfully prosecuted should be referred to the [Head of Human Resources, People Services Manager.](#)

9. Further Guidance

- 9.1 Further guidance on this Fraud Response Plan can be obtained from [Human Resources, the Strategic Director, Assistant Director, the Monitoring Officer, Chief Executive Officer, Chief Finance Officer or the Chief Auditor. or the Audit and Governance Manager, the Chief Finance Officer or the Head of Internal Audit.](#)

Fraud Indicators

A number of frauds can become known because of suspicions about the behaviour of an individual. Managers and employees should be alert to any warning signs that might indicate that fraud is taking place. These include:

- employees under stress without a high workload;
- first to arrive in the morning, last to leave at night;
- egotistical (e.g. scornful of system controls);
- a risk taker or rule breaker;
- reluctance to take leave;
- unexplained wealth;
- sudden change of lifestyle;
- cosy relationships with contractors or suppliers;
- suppliers or contractors who insist on dealing with one particular employee;
- disgruntled at work;
- genuine financial need;
- unusual behaviour.

There are also a number of indicators in relation to working practices that may indicate that fraud could exist. These include:

- inadequate segregation of duties;
- absence of controls and audit trails;
- key documents missing (e.g. invoices, contracts);
- documentation that is photocopied or lacking essential information;
- excessive variations to budgets or contract values;
- excessive movements of cash between accounts;
- numerous adjustments or exceptions;
- lack of rotation of duties;
- lowest tenders or quotes passed over with the minimum of explanation;
- PO Boxes as addresses;
- Understaffing in key areas;
- Low employee morale.

Nuneaton and Bedworth Borough Council Fraud Response Plan 2025

1. Introduction

Nuneaton and Bedworth Borough Council is committed to the highest possible standards of openness, probity and accountability.

In line with this commitment, the Council's Anti-Fraud, Corruption and Bribery Strategy (Part 4I of the Constitution) outlines the principles we are committed to in relation to preventing, deterring and detecting fraud and corruption.

This Fraud Response Plan reinforces the Council's robust approach by setting out the ways in which concerns about suspected fraud or corruption should be reported and how they will be dealt with.

2. The fraud environment

- 2.1 The environmental factors that will allow fraud to occur fall under two main categories – operational and personal. Practical examples of these factors are:

Operational factors:

- lack of a robust control environment;
- undocumented procedures;
- failure of management information systems;
- employees required to carry out duties which exceed their job requirements;
- staff shortages at any level;
- lax attitude to security.

Personal factors:

- personal financial problems;
- personal character traits – greed;
- pressure/coercion exerted by a third party;
- kudos from demonstrating the ability to beat the system.

- 2.2 Fraud tends to occur where the following characteristics are prevalent:

means + motive + opportunity = fraud, where

means = knowledge of job/systems in operation
 motive = personal circumstances of the employee
 opportunity = operational/control weaknesses.

3. Responsibilities in respect of fraud and corruption

- 3.1 Managing the risk of fraud and corruption is the responsibility of management. Audit procedures alone, even when performed with due professional care, cannot guarantee that fraud and corruption will be detected. Internal Audit does not have responsibility for the prevention or detection of fraud and corruption. Internal auditors should however, be alert to risks and exposures that could allow fraud or corruption to occur.
- 3.2 It is vital that management at all levels are alert to potential problems in their work area and that adequate and effective safeguards are in place to prevent irregularities taking place. However, managers should also satisfy themselves that sufficient procedures are in place, so that in the event of a breach, any irregularity would be identified promptly, so minimising any loss to the authority. Internal audit can provide advice and assistance in this area. Appendix A provides a list of the warning signs that may indicate that a fraud is taking place.

4. Procedures for reporting suspected fraud

- 4.1 It is the responsibility of all employees to notify their Assistant Director, Service Manager, Strategic Director or the Chief Finance Officer immediately of any suspected fraud, irregularity or misappropriation of the Council's assets. Any Assistant Director, Service Head Manager or Strategic Director becoming aware of any such irregularity shall immediately notify the Chief Finance Officer.
- 4.2 Employees play an important role in detecting fraud and corruption. They may have suspicions about colleagues they work with or those in different sections whose work they deal with. All employees should be encouraged to discuss their concerns with line management if they suspect financial irregularities are occurring.
- 4.3 The Council has a Confidential Reporting Code ("whistle-blowing" policy contained in Part 5I of the Constitution), the aim of which is to provide guidance to employees who have serious concerns about practices that are contrary to the rules, regulations and legislation covering Council activities. The Code details how they should report these concerns, so that appropriate action can be taken.
- 4.4 The Council's Complaints procedure provides an avenue through which the public can raise concerns about suspected cases of fraud and corruption.

5. When a concern has been raised

- 5.1 Where employee fraud is involved, the Strategic or Assistant Director should consult with the Human Resources team to decide whether any employee(s) involved should be suspended in accordance with the Council's disciplinary procedures.
- 5.2 In respect of member fraud, the Strategic or Assistant Director should consult with the Monitoring Officer, Chief Finance Officer or Chief Executive Officer as to the best way to proceed, in consultation with the Chief Auditor.
- 5.3 The Chief Auditor must be notified of any suspected irregularity so that processes and procedures can be reviewed to prevent any further irregularities occurring.

6. Investigation of Fraud

6.1 Who should carry out the investigation?

The Strategic or Assistant Director, in consultation with the Human Resources team, shall appoint an investigating officer and the investigation shall be conducted inline with the Council's disciplinary procedures.

If the allegation relates to theft of Council assets by persons not employed by the Council, the matter may be referred to the Police. There should be no need for internal audit involvement in these cases, other than to advise on security of assets. Such losses will need to be reported to the Council's insurers to support and future claims and it may be necessary to report the matter to the Police to obtain a crime number.

6.2 Managing the investigation

Any internal investigation should be carried out with great care and with due consideration of the possibility of future criminal proceedings.

In order to maximise the effectiveness of fraud investigations it is crucial that clear objectives are set at the earliest opportunity. At the highest level, the objectives will be to:-

- establish the facts;
- prevent repetition and deter others; and
- recover any loss to the Council.

Investigations into suspected irregularities should be conducted in a timely and professional manner.

It is important from the outset of an investigation to maintain a chronological log of events. This log should record all details of telephone calls, documents obtained, interviews conducted and any

other details that arise, however trivial. This is evidence of the way in which the investigation was conducted, which may be challenged at a disciplinary or criminal hearing.

There is a need to maintain confidentiality and all employees engaged in fraud investigations need to bear this in mind. All relevant legislation, such as data protection , Human Rights Act, Regulation of Investigatory Powers Act, Police and Criminal Evidence Act etc., must be complied with at all times.

Where a Police investigation is taking place concurrently with an internal investigation, the requirements of the Police investigation will take precedence over the internal investigation.

Requests for information from anyone outside of the Council, particularly the press, should be referred directly to the Chief Executive Officer or the appropriate Director (Strategic or Assistant). The investigating officer should make no comment as any release of information could seriously prejudice the investigation and any future disciplinary or criminal proceedings.

Where the loss is substantial, legal advice should be obtained about the need to freeze the suspect's assets through the court, pending conclusion of the investigation. Legal advice should also be obtained about the prospects of recovering losses through the civil court, where the perpetrator refuses repayment. The authority will normally expect to recover costs in addition to losses.

6.3 Gathering evidence

For the purposes of criminal proceedings, the admissibility of evidence is governed by the Police and Criminal Evidence Act 1984 (PACE). For non-criminal proceedings, i.e. civil or disciplinary hearings, PACE does not apply, but should be regarded as best practice.

At the start of the investigation, it is important that original records and documents are obtained as soon as possible. These must be marked with where, when and from whom they were obtained as this evidence trail may be required if fraud is proven. When the original document is not available, for example because it has been microfilmed and destroyed, a hardcopy should be taken and it should be certified as being a true copy of the original.

Individual documents should be retained in their original state. Original documents must not be marked as this could later allow the veracity of the document to be called into question.

If the investigation involves the misuse or loss of cash, stores or other physical assets, a count must be completed to determine the actual

value or quantity present at a fixed point in time. The count must be completed by at least two employees to prevent any suggestion that the evidence has been tampered with.

During the initial stages of the investigation, it may become evident that the full extent of the crime is more serious than initially thought. In these instances, it may be necessary to reconsider the need to suspend the suspect(s).

It may be necessary to investigate systems other than those involved in the original suspicion, as the suspect may have had opportunities to misappropriate Council's assets by other means and it is important to identify the full details of the fraud.

6.4 Interviewing

As the investigation develops there will be matters arising that can only be substantiated or clarified by interview. All employees, not just suspect(s), who may be able to assist with the investigation, should be interviewed to allow a full picture of events to be compiled. The interview process shall be undertaken in accordance with the Disciplinary Policy.

The interviews will be undertaken by the investigating officer and a representative from Human Resources unless informal interview is deemed appropriate by the investigating officer. At the start of the interview, it should be made clear to the interviewee that the purpose of the interview is to establish the facts and that it is not part of a disciplinary process. Similarly, representatives who accompany the interviewee should be told that their role is to act as an observer to ensure that the interview is conducted fairly and that they must not answer on behalf of the interviewee.

Criminal cases are referred to and investigated by the Police and their interviews have to comply with the Police and Criminal Evidence Act (PACE). Failure to comply with PACE means that nothing said by the suspect during the interview will be admissible in a court of law. Therefore, before interviewing the suspect as part of an initial investigation, consideration must be given to the sufficiency of evidence obtained to date and the likelihood of securing a criminal conviction. If there is a likelihood then the case must be referred to the Police for them to continue with the investigation.

In the case of gross misconduct, the seriousness of the allegation may require the individual to be interviewed immediately and in such cases, no notice will be given. The employee should however be given the opportunity to get representation but if this is not possible the interview should go ahead without it.

6.5 Reporting the findings

When an investigation has been concluded, a report should be compiled..

A separate report may be required outlining the system weaknesses that allowed the fraud to be perpetrated, with recommendations to address these.

A written report should normally be drafted at the end of the investigation but it may be necessary to compile interim reports on the progress of the investigation if it exceeds a month in duration. This may just be an e-mail to the Strategic or Assistant Director keeping them up-to-date with progress.

The final written report should be addressed to the Strategic or Assistant Director and Chief Executive Officer if the fraud is serious.

On receipt of the final report, the evidence presented will be considered to establish whether there is a need for legal proceedings or disciplinary action.

6.6 Involving the Police following an internal investigation

Liaison with the Police should begin as soon as it is clear that a criminal offence has been committed. The decision to involve the Police will include the following considerations:

- prosecution of the perpetrators through criminal action;
- potential seriousness of the malpractice involved;
- whether the malpractice is fraudulent;
- whether the malpractice is thought to be continuing;
- involvement of individuals or organisations outside the authority;
- need to take deterrent action; and
- adverse publicity.

The Police should only be contacted with details of a suspected fraud once approval has been obtained from the appropriate Strategic or Assistant Director, Chief Executive Officer and the Monitoring Officer.

7 Computer Forensic Investigation

- 7.1 The growth of e-government has meant that fraud, theft, irregularity, improper use or misappropriation of the Council's assets increasingly involves electronic media. The act of securing and investigating electronic evidence is extremely difficult and must be undertaken properly and to the highest scientific and professional standards.

- 7.2 Do not be tempted to investigate yourself, many well-meaning employees have fallen into this trap and have contaminated or destroyed digital evidence. Failure to secure evidence in line with current best practice could rule the evidence inadmissible in court. Therefore, always seek help from a computer forensic specialist. If the computer is switched off then leave it switched off, if it is switched on then do not interact with it.

8. References for employees disciplined or prosecuted for fraud

- 8.1 Any request for a reference for an employee who has or is in the process of being disciplined or has been successfully prosecuted should be referred to the People Services Manager.

9. Further Guidance

- 9.1 Further guidance on this Fraud Response Plan can be obtained from Human Resources, the Strategic Director, Assistant Director, the Monitoring Officer, Chief Executive Officer, Chief Finance Officer or the Chief Auditor.

Fraud Indicators

A number of frauds can become known because of suspicions about the behaviour of an individual. Managers and employees should be alert to any warning signs that might indicate that fraud is taking place. These include:

- employees under stress without a high workload;
- first to arrive in the morning, last to leave at night;
- egotistical (e.g. scornful of system controls);
- a risk taker or rule breaker;
- reluctance to take leave;
- unexplained wealth;
- sudden change of lifestyle;
- cosy relationships with contractors or suppliers;
- suppliers or contractors who insist on dealing with one particular employee;
- disgruntled at work;
- genuine financial need;
- unusual behaviour.

There are also a number of indicators in relation to working practices that may indicate that fraud could exist. These include:

- inadequate segregation of duties;
- absence of controls and audit trails;
- key documents missing (e.g. invoices, contracts);
- documentation that is photocopied or lacking essential information;
- excessive variations to budgets or contract values;
- excessive movements of cash between accounts;
- numerous adjustments or exceptions;
- lack of rotation of duties;
- lowest tenders or quotes passed over with the minimum of explanation;
- PO Boxes as addresses;
- Understaffing in key areas;
- Low employee morale.

Nuneaton and Bedworth Borough Council Partnership Framework

1. Background

- 1.1 In recent years, partnership working on specific projects and in delivering services has increased. As a result, our communities have benefited from better services through sharing resources, expertise and flexibility. However, as well as the many benefits that collaboration can bring there can also be difficulties.
- 1.2 This guidance has been developed to support the planning and delivery of effective partnership working and to ensure that any partnerships we are involved in are managed with appropriate governance arrangements. It contains advice on what should be taken into consideration when entering into a new partnership or reviewing an existing one as fit for purpose.

2. What is a Partnership

- 2.1 NBBC has adopted the following definition of a partnership:-
- “An agreement between the Council and one or more independent legal bodies, organisations or individuals to work collectively to achieve a common purpose with specified aims and objectives”.
- 2.2 Specifically excluded from the definition of a partnership are:-
- Contracts where ~~NBBC~~ the Council are simply paying for the delivery of a service;
 - Grant funding arrangements;
 - Networking or information sharing functions;
 - Appointments to outside bodies where the Council has no strategic or policy function;
 - Consultation forums;
 - Service level agreements; and
 - Shared service arrangements with other councils or public bodies e.g. IT and Building Control.
- 2.3 The excluded items still represent important delivery mechanisms for the Council. They will therefore require an appropriate level of governance. The governance arrangements must comply with Contract Procedure Rules and will need to reflect the governance requirements set out in this framework where applicable. In addition, the performance of such arrangements will need to be monitored by Councillors through the scrutiny process.

3. Deciding on the need for a Partnership

Rationale for the partnership

Nuneaton and Bedworth Borough Council Partnership Framework

3.13.1—Some partnerships are statutory but others are voluntary. For all voluntary partnerships, the lead officer must make a case for involvement and outline the benefits that partnership working will bring. It must be clear as to why the partnership exists and what the aims and objectives of the partnership are, and these must be consistent with the key aims and priorities of Nuneaton and Bedworth Borough Council (NBBC).

3.2 The following questions will provide a structured process in developing a business case.

Why is there a need for the partnership?

- Is there sufficient justification?
- What are the anticipated outcomes?
- Is this the best way to meet an objective?
- Could it cause duplication? i.e. a similar or more suitable forum already exists
- Have all other delivery options been considered?

Is the collaboration a true partnership?

- Does it meet the definition of a partnership as defined in this guidance?

What is the legal status of the partnership?

What are the intended objectives of the partnership?

- How will these align with the Council's own key aims and priorities?

What resources might be required?

- Be clear and realistic about the level of resources that may need to be allocated to the partnership
- Will there be an impact on other Council services?
- Will the partnership add value and improve the quality of public services?

What are the potential risks?

- Has a risk assessment been carried out?

Who are the key stakeholders?

Initial Agreement

3.3 All business cases will need to be submitted and approved by Senior Leadership Team to the relevant Director or Assistant Director for an initial agreement. Once agreed, the partnership will have to be assessed to establish its significance.

4. Classifying the Significance of a Partnership

- 4.1 The scorecard at Appendix A sets out the criteria used to assess the significance of each partnership. These are:-
- The relationship to the Corporate priorities;
 - The decision making responsibilities of the partnership;
 - The statutory or regulatory context;
 - Partnership costs;
 - The consequences of the partnership failing; and
 - The extent to which the partnership helps to mitigate an operational or strategic risk.
- 4.2 A score of up to 50% ~~1 to 12~~ will assess the partnership as having limited significance, a score between 51%-75% ~~13~~ results in a ~~to 18~~ moderate significance and 75% and above ~~19 to 24~~ major significance. The corporate governance arrangements required is very much dependent upon the outcome of this assessment.

5. Approval

- 5.1 Partnerships with limited significance can be approved by the relevant Assistant Director or Strategic Director unless budget provision isn't in place in which case a Business Case would be required and thus, approved at Senior Leadership Team. Those with moderate significance require approval of the Senior Leadership Team and if required, Cabinet Corporate Management Team and those with major significance require approval at Senior Leadership Team and a formal report to the Cabinet or Full Council. All approved partnerships must be recorded in the Council's partnership register, which is maintained by the Corporate Services Director.

6. Corporate Governance Arrangements

- 6.1 All partnerships **must** have, as a minimum, the following arrangements in place:-

Decision-making and meeting arrangements

In order to achieve its objectives, any partnership needs to have a clear and accountable decision-making process. Partners should agree:-

- The minimum number of attendees at meetings to make a binding decision (the quorum);
- How agreement will be reached (usually by a simple majority);
- How decisions will be made outside of meetings in an emergency;
- What will happen if agreement can't be reached (e.g. does the Chair have the deciding vote?); and

Nuneaton and Bedworth Borough Council Partnership Framework

- Who will be responsible for minuting meetings and distributing paperwork?

Financial management

All partnerships should exercise sound financial controls. Good controls include:-

- Segregation of duties;
- Transparency and accountability in budgeting and financial planning, accounting and financial transactions and reporting;
- Establishing from the outset, levels of authority and signatories for financial transactions. For example, who is able to authorise payments and sign cheques;
- Awareness of the terms and conditions attached to any funding received and ensuring that these can be met and reported upon; and
- Producing regular financial reports.

Termination arrangements

Exit arrangements should be considered at the start of the partnership. The arrangements will depend upon the significance of the partnership but issues to be considered include:-

- What will happen to any employees working on behalf of the partnership? (i.e. redundancy implications)
- What will happen to any assets owned by the partnership?
- What will happen to any documentation and information held by the partnership?
- Is there a need to consult with stakeholders before withdrawing from or ending the partnership?

Complaints and Compliments

If more than one organisation is providing a service, it may not always be obvious who to contact. In some partnerships, it will be sufficient to use the existing procedures of the organisation to which the complaint or compliment relates. In others, partners may want to consider joint working protocols.

The following points of good practice are recommended when agreeing a complaints protocol:-

- The process should be clear and accessible to all groups of the community;
- Effective communication channels should be in place;
- Responsibilities for handling complaints should be clearly defined;
- Effective monitoring and review arrangements should be in place to identify learning points from complaint outcomes. Individual partners should have access to any evidence required; and

Nuneaton and Bedworth Borough Council Partnership Framework

- Staff should be trained so that they understand the agreed procedures and have the right skills to resolve problems quickly.

6.2 The following arrangements will also need to be in place but on a sliding scale depending upon the significance of the partnership.

Agreements

Partners need to bring clarity to the governance of their collaboration. This requires agreement among them on purpose, membership and accountability, which should be documented in a partnership agreement. No single form of governing document is appropriate for all kinds of partnership. Each partnership must decide for itself what it needs, taking into account any legal requirements. The main elements to be considered are:-

- The name of the partnership;
- Aims and objectives;
- Membership, including status of different members and termination of membership, schemes of delegation;
- Powers;
- Roles;
- Income;
- Meetings: notice and frequency of meetings; minutes; quorum rules; chairing arrangements; voting arrangements; and representation of other members;
- Decision making processes (scope and timescales);
- Timescales;
- Amendments to the partnership rules;
- Complaints procedure;
- Insurance requirements and
- Exit strategy/arrangements for dissolution.

Performance management

Managing partnership performance is becoming increasingly important. Examples of good practice include:-

- An alignment between the partnership and corporate plans, targets and delivery;
- Formal arrangements for partnership representatives to report back on partnership activity, which focuses on outcomes;
- A process for monitoring and evaluating the effectiveness and impact of partnerships;
- Adequate use of SMART action plans, targets and key performance indicators;
- Opportunities to challenge the performance of partners; and
- Effective scrutiny arrangements.

Risk management

Typical risks associated with partnership working include:-

- Unclear governance arrangements;
- Unclear financial and legal liabilities;
- Service delivery failures;
- Differing cultures leading to poor relationships;
- Incompatible systems and processes;
- Failures of partners to perform; and
- Lack of commitment from other partners.

7. Scrutiny Arrangements

7.1.1 All partnerships will need to be scrutinised and the scorecard at Appendix A states who is responsible for the scrutiny process. The level of scrutiny is dependent upon the significance of the partnership but the following are examples of what could be considered as part of the process.

Purpose

Does the Council continue to have clear and sound reasons for being involved in the partnership? Is it still appropriate for the Council to continue its involvement with the partnership?

Significance

Is the most recent assessment of the significance of the partnership to the Council still appropriate? Does it need to be updated?

Performance

How is the partnership's progress towards expected outcomes measured? What has the partnership achieved during the past year?

Financial

What is the current financial position of the partnership? Is the partnership delivering best value for the Council?

Governance Arrangements

Are appropriate governance arrangements in place? Are agreed policies and procedures being complied with?

8. Information sharing and data management

Where personal or sensitive information is collected or held by the partnership, it is essential that the partnership complies with the Data Protection Act (1998) and the Freedom of Information Act (2000).

Nuneaton and Bedworth Borough Council Partnership Framework

If the partnership does hold personal data, it is essential to decide who owns the information and how it will be stored and retrieved. All personal information must be securely disposed of once it is no longer required.

9. Equality and diversity

Employees entering into partnerships on behalf of the Council must consider and comply with the Corporate Equality Policy.

Partnerships must show evidence that their services are accessible, inclusive and do not discriminate.

| [Appendix 1 – Partnership Scorecard](#)

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Nuneaton and Bedworth Borough Council Partnership Framework

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Partnerships must show evidence that their services are accessible, inclusive and do not discriminate.

Appendix 1 – Partnership Scorecard

PARTNERSHIP SIGNIFICANCE ASSESSMENT SCORECARD

Partnership Name:

Please enter the score in the last column which most closely represents your partnership. Answer all applicable questions, using scores of 1, 2, 3, 4, or 5.

This table assesses the significance of your partnership / partnership you are proposing. .

Impact No.	Description	Insignificant (Score "1")	Minor Significance (Score "2")	Moderate Significance (Score "3")	Major Significance (Score "4")	Highly Significant (Score "5")	Score
1	Partnership costs: the Council directly contributes money to the partnership, contributes resources (officer time / work done), or money is directed through the Council's accounts	< £50K	£50K to 75K	£75K to £100K	£100K to £500K	> £500K	0
2	Relationship to the Corporate Priorities: to what extent is the partnership's success critical to the achievement of a corporate priority.	Not linked to any divisional, departmental or corporate priorities	Indirect links to successful achievement of a corporate priority	Moderate contribution to successful achievement of a corporate priority	Significant contribution to the successful achievement of a corporate priority	Essential to successful achievement of 1+ corporate priority	0
3	What are the consequences (financial / reputational / liability / political) for the Council of failures within the Partnership?	Insignificant consequences	Minor consequences	Moderate consequences	Major Significance	Highly Significant	0
4	The partnership takes decisions on behalf of or which are binding on the Council	The partnership does not take decisions on behalf of the Council	The partnership does not take decisions on behalf of the Council but Council representatives feed back / lobby the Council.	The partnership does not take decisions on behalf of the Council but Council representatives with decision making authority attend the partnership and consider and influence its recommendations.	The partnership does not take decisions on behalf of the Council but representatives with decision making authority attend the partnership and agree to be bound by its decisions.	The partnership has decision making responsibilities directly delegated to it from the Council / Executive Board.	0
5	Statutory or Regulatory Context: is the Council required to set up the partnership by law or is the Council required to set up the partnership in order to receive additional funding / meet a requirement of the assessment regime / statutory guidance.	Not required by law or for funding	Indirect links to successful achievement of funding or achievement in CPA	Limited links to successful achievement of funding or achievement in CPA	Direct links to successful achievement of funding or achievement in CPA	The Council is required to participate in this partnership by law or to receive specific funding	0
6	Risk: the partnership contributes to the management of risks identified on corporate or departmental risk registers.	The partnership does not contribute to the management of high priority risks identified on corporate or departmental risk registers	The partnership indirectly contributes to the management of high priority risks identified on a departmental risk register	The partnership directly contributes to the management of high priority risks identified on a departmental risk register.	The partnership indirectly contributes to the management of a high priority corporate risk	The partnership directly contributes to the management of a high priority corporate risk	0
TOTAL:							0
HIGHEST POSSIBLE SCORE (No. of questions answered x 6)							0
IMPACT SCORE ("Total" divided by "Highest Possible Score" x 100)							#DIV/0!

The matrix below uses the Significance Score to categorise your partnership.

Suggested Rigour	Asse	LEVEL 1 Limited Significance (0-50%)	LEVEL 2 Moderate Significance (51-75%+)	LEVEL 3 Major Significance (76%+)
The project needs to be endorsed / approved by	Strategic Director	Senior Leadership Team and Cabinet if stipulated by the 3 Statutory Officers	Senior Leadership Team followed by Cabinet or Full Council subject to scope	
Business Case required	Not essential unless no budget provision	Mandatory	Mandatory	Mandatory
The partnership must provide value for money for the Council	Mandatory	Mandatory	Mandatory	Mandatory
Clear performance management targets must be set	Advisable	Mandatory	Mandatory	Mandatory
The partnership will be scrutinised by	Directorate Management Team	Corporate Programme Review Board (CPRB), Scrutiny Panels and Directorate Management Team	Corporate Programme Review Board (CPRB), Scrutiny Panels and Corporate Executive Team	
Risk management arrangements	Risk register not required but advisable	Risk register recommended or the partnership is added to Operational Risk Register as a minimum. Must have evidence to show that risks are considered e.g. in minutes of meetings	Risk register mandatory. Consideration given if suitable for Strategic Risk Register. If not, added to Operational Risk Register or a dedicated risk register.	

AGENDA ITEM NO. 12

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Audit and Standards Committee
Date of Meeting:	17 th March 2026
Subject:	Local Code of Corporate Governance
Portfolio:	Not Applicable
Responsible Officer:	Assistant Director – Democracy and Governance
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Strive for transparency and accountability, in all that we do. Increase public scrutiny. and Set ambitious and challenging budgets, to ensure taxpayers money is respected, and high-quality services are delivered.
Ward Relevance:	All
Public or Private:	Public
Forward Plan:	No
Subject to Call-in:	No

1. Purpose of report

- 1.1. To provide the Audit and Standards Committee with the reviewed Local Code of Corporate Governance for consideration, approval and referral to Full Council for adoption.

2. Recommendations

- 2.1. That the revised Local Code of Corporate Governance be endorsed; and
2.2. It be recommended to Full Council to approve and adopt the revised Local Code of Corporate Governance.

3. Background

3.1. The Local Code of Corporate Governance hasn't been formally revised for some time (believed to be up to seven years or so). The Code was revamped shortly after the requirements of the Delivering Good Governance in Local Government Framework (2016) was released, which whilst remains current, the Council hasn't reviewed its Code formally since. Therefore, the Assistant Director – Democracy and Governance proposed as part of the Audit and Standards Work Programme for the 2025/2026 Municipal Year, a review and refresh of the Code to ensure it reflects the current position of the Council. It would also bring it in line with the revised corporate document suite.

4. Body of report and reason for recommendations

4.1. This Local Code of Corporate Governance sets out how Nuneaton and Bedworth Borough Council (The Council) ensures that it conducts its business in accordance with the law and proper standards, and that public money is safeguarded, properly accounted for, and used economically, efficiently and effectively. The proposed version of the Local Code of Corporate Governance (The Code) has been updated in line with the CIPFA/SOLACE Framework (2016) and the [Council's Corporate Plan 2025–2029](#).

4.2. The revised Code has been revised to incorporate elements of the Council's governance arrangements that have been strengthened or updated to ensure ongoing effectiveness.

5. Consultation with the public, members, officers and associated stakeholders

5.1. A Consultation process was undertaken by the Assistant Director – Democracy and Governance internally from 2nd January 2026 until 5th February 2026, including the Senior Leadership Team and other key officers and parties instrument in key corporate governance related activities (such as data, performance, fraud, and Audit (CMAP)). All feedback received was incorporated into the revised Code which was then approved internally by Senior Leadership Team 17th February 2026.

6. Financial Implications

6.1. No direct financial implications related to the adoption of a revised Local Code of Corporate Governance.

7. Legal Implications

7.1. The governance review process ensures that the Council discharges its statutory duties under the Local Government Act 1999 and the Accounts and Audit Regulations 2015 as set out at

paragraphs 5 to 8 of the report. The Accounts and Audit (England) Regulations 2015 oblige the Council to produce an Annual Governance Statement for each accounting year evidencing how the Council has performed. The Local Code of Governance proposed to be adopted assists the Council in meeting the requirement of producing that Annual Governance Statement and allows the Statement to assess performance as against the Code. There is no specific statutory requirement for a Local Authority to produce or adopt a Local Code of Corporate Governance. However, the CIPFA Framework 'Delivering Good Governance in Local Government' clearly sets out that it is best practice to do so. The Code of Corporate Governance enables the Council to demonstrate how it complies with the Delivering Good Governance in Local Government Framework 2016.

8. Equalities implications

- 8.1. None directly arising from this report following an Equality Impact Screening Form, however it should be noted from the Code, that the Council has adopted a new Equality and Diversity policy recently approved by Cabinet (February 2026).

9. Health implications

- 9.1. No direct health implications are associated to this report.

10. Climate and environmental implications

- 10.1. No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

- 11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

- 12.1. No direct risk management implications have been identified, but the assessment of corporate risk is a key component of the Council's governance arrangements and ensuring the Code is updated, mitigates risk associated to old practices, structures and governance which has likely been superseded since the Codes initial adoption in 2016.

13. Human resources implications

- 13.1. No direct human resource implications have been identified.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Not to approve the Local Code of Governance. As highlighted however, the requirement to have a Code is best practice as indicated by CIPFA/SOLACE guidance and supports the Annual Governance Statement required by statute by setting out clearly the Council's approach to governance across the organisation.

15. Conclusion

15.1. In summary, the revised Local Code of Corporate Governance reflects current best practice and strengthens the Council's commitment to transparency, accountability and effective decision-making. The Audit and Standards Committee is therefore invited to consider and endorse the draft and recommend that Full Council approve and adopt the updated Code. In doing so, it ensures that our governance arrangements remain fit for purpose and aligned with the principles of good governance that underpin public trust and organisational resilience.

16. Appendices

16.1. Please note the following appendices:

- i. Appendix A - Local Code of Corporate Governance - 2026 - For Approval.
- ii. Appendix B - NBBC Current Local Code of Corporate Governance.

17. Background papers

17.1. Please note there are no background papers attached to this report.

18. Report Writer Details:

Officer Job Title: Assistant Director – Democracy and Governance

Officer Name: Matthew Wallbank

2026

Local Code of Corporate Governance

Author and Version information

Author: Assistant Director – Democracy and Governance

Approved by: Audit and Standards Committee [Month] 2026

Version no: 2

Date: 06/02/2026



Audit and Standards Committee - 17th March 2026

Nuneaton and Bedworth
Borough Council
06/02/2026

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1.0 Introduction

- 1.1. This Local Code of Corporate Governance sets out how Nuneaton and Bedworth Borough Council (The Council) ensures that it conducts its business in accordance with the law and proper standards, and that public money is safeguarded, properly accounted for, and used economically, efficiently and effectively. This version of the Local Code of Corporate Governance (The Code) has been updated in line with the CIPFA/SOLACE Framework (2016) and the [Council's Corporate Plan 2025-2029](#).
- 1.2. This document sets out and describes the Council's commitment to corporate governance, and to ensure its effective implementation and application in all areas of the Council's work.
- 1.3. This Code applies to the Council's elected members, officers and partnership arrangements. This Code will be accessible on the Council's website.

2.0 Our Commitment

- 2.1. The Council **is committed** to the principles of good governance and aims to demonstrate its ongoing commitment through the ongoing review and adoption of a Local Code of Corporate Governance in line with the CIPFA/Solace 2016 Framework.
- 2.2. Good governance underpins the [Council's Corporate Plan 2025-2029](#) and Council values. The Council Values are outlined in the Code of Conduct for Employees found in Part 5B of the [Constitution](#), these are:

- 1. Service** for our customers
- 2. Integrity** in our actions
- 3. Accountability** for our performance
- 4. Co-operation** with councillors, colleagues and partners
- 5. Objectivity** in our decisions
- 6. Efficiency** to keep overall costs down
- 7. Confidence** to try things out

3.0 What is Governance and what does 'Good Governance' look like?

- 3.1. The International Framework: Good Governance in the Public Sector (Chartered Institute of Public Finance and Accountancy / International Federation of Accountants, 2014), the 'International Framework', defines governance as follows:

Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.

- 3.2. Good governance is about how the Council ensures that it is doing the right things, in the right way, for the communities it serves, in a timely, inclusive, open, honest and accountable manner. In practice, good governance is made up of all the systems, processes, culture and behaviours which direct and control the way in which we work and through which we account to, engage with and lead our communities.

- 3.3. The International Framework also states that:

To deliver good governance in the public sector, both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times. Acting in the public interest implies primary consideration of the benefits for society, which should result in positive outcomes for service users and other stakeholders.

4.0 The Principles of Good Governance

- 4.1. The diagram below, taken from the International Framework, illustrates the principles of good governance in the public sector and how they relate to each other. The Council positively recognises and accepts these underlying principles of good governance.

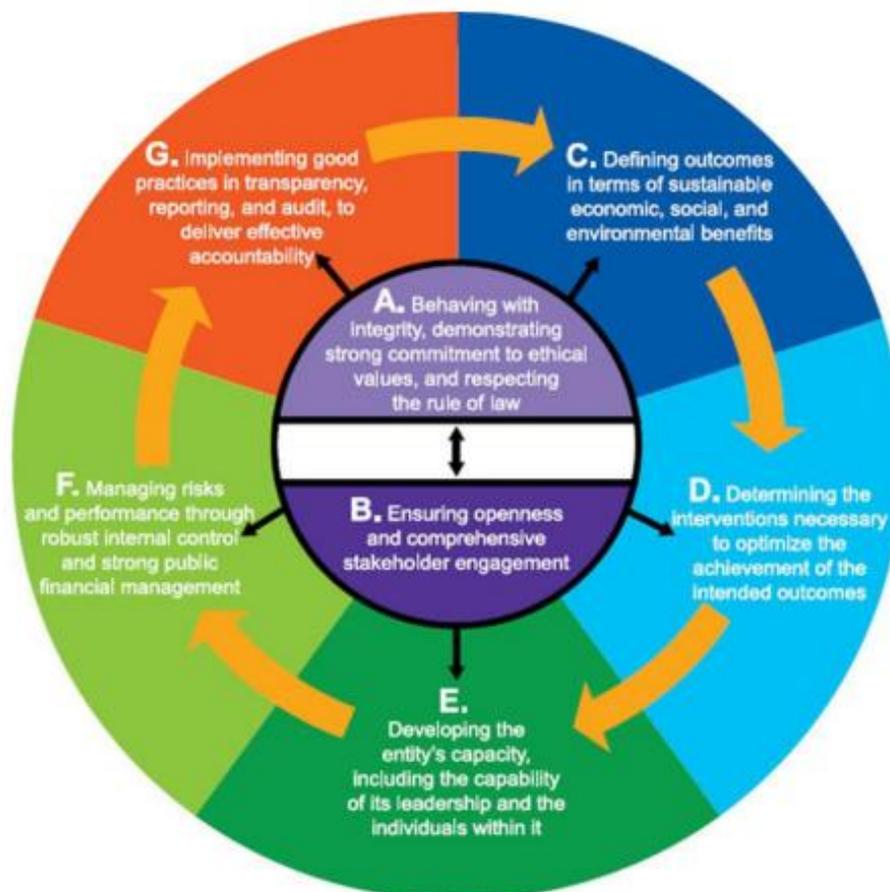
- 4.2. The seven core principles of good governance as set out in the CIPFA/SOLACE Framework (2016) are:

- 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 capacity, capability and leadership of members and officers.
- 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.

4.3. Principles A and B in the centre of Diagram 1, permeate implementation of principles C to G. Diagram 1 also illustrates that good governance is dynamic, and that an entity as a whole should be committed to improving governance on a continuing basis through a process of evaluation and review.

Diagram 1 – Seven principles of good governance



- 4.4. [Appendix A](#) sets out the Council's controls and documents which refer to the systems, processes, culture and behaviours in place at the Council in accordance with The Code.

5.0 Implementation and Monitoring

- 5.1. The Council maintains a framework of systems, processes, cultures and values by which the organisation is directed and controlled. This includes the [Constitution](#), Codes of Conduct, Financial and Contract Procedure Rules, Risk Management Strategy, and the Annual Governance Statement (AGS) to name a few.
- 5.2. Each year the Council will carry out a review of its governance arrangements to ensure compliance with The Code. The purpose of the review will be to provide assurance that governance arrangements are adequate and operating effectively, or to identify action that is planned to ensure effective governance in the future. The outcome of the review will take the form of an Annual Governance Statement prepared on behalf of the Leader and Chief Executive. It is submitted to the Audit and Standards Committee for consideration and review. The Annual Governance Statement will accompany the Council's Statutory Statement of Accounts, as required by the Accounts and Audit Regulations. The Annual Governance Statement can be found on the website - [Annual Governance Statement | Transparency code | Nuneaton and Bedworth Borough Council](#).
- 5.3. The Council's Audit & Standards Committee provides independent assurance of the adequacy of the governance framework, and reviews the Annual Governance Statement each year.

6.0 Review and Approval

- 6.1. This Code will be reviewed at least every three years, or sooner if required by legislative or structural changes. Approval will be given by the Audit and Standards Committee.

Appendix A – How the Council applies the 7 principles

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

Supporting Principles:

1. Behaving with integrity
2. Demonstrating strong commitment to ethical values
3. Respecting the rule of law

Ref	How does the Council achieve this?	Supporting Examples
1	<p>1.1. Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation.</p> <p>1.2. Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles).</p>	<ul style="list-style-type: none"> • Codes of Conduct for employees and members, as well as the Member and Officer Protocol (all three contained in the Constitution). • Induction for new members and staff on the standard of behaviour expected. • Human Resource Policies. • Annual Development Reviews for employees. • Council Values (2.2 of the Code). • Corporate Plan. • Declarations of interests made at all meetings which are documented in the minutes and online.

	<p>1.3. Leading by example and using the above standard operating principles or values as a framework for decision making and other actions.</p> <p>1.4. Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively.</p>	<ul style="list-style-type: none"> • Audit and Standards Committee (Article 9 of the Constitution). • Rules of Procedure in the Council's Constitution. • Register gifts and hospitality for members and employees, which is published on the Council's website. • Anti-fraud and Corruption Policy (Constitution part 4I) and a Fraud Response Plan. • Whistleblowing Policy to protect individuals who express concerns (Constitution part 5I). • Whistleblowing officer appointed to be a first point of contact (Monitoring Officer). • Member Officer Protocol (Constitution Part 5C).
2	<p>2.1. Seeking to establish, monitor and maintain the organisation's ethical standards and performance.</p> <p>2.2. Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation.</p>	<ul style="list-style-type: none"> • Constitution. • Annual Governance Statement. • Scrutiny of decision making process and call-in procedure. • Audit and Standards Committee review gifts and hospitality register and declarations of interest annually.

		<ul style="list-style-type: none"> • Robust recruitment and selection process. • Codes of Conduct for employees and members, as well as the Member and Officer Protocol (all three contained in the Constitution). • Council Values (2.2 of the Code). • Annual Development Reviews for employees. • Internal and External Audit provision.
3	<p>3.1. Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations.</p> <p>3.2. Creating the conditions to ensure that the statutory officers, other key post holders, and members, are able to fulfil their responsibilities in accordance with legislative and regulatory requirements.</p> <p>3.3. Striving to optimise the use of the full powers available for the benefit of citizens,</p>	<ul style="list-style-type: none"> • Job descriptions and specifications. • Constitution. • Monitoring Officer Protocol (Constitution part 5F). • Codes of Conduct for employees (contained in the Constitution). • Delegated decisions taken by officers are recorded and published on the Council's website. • Audit and Standards Committee (Article 9 of the Constitution). • Anti-fraud and Corruption Policy (Constitution part 4I) and a Fraud Response Plan.

	<p>communities and other stakeholders.</p> <p>3.4. Dealing with breaches of legal and regulatory provisions effectively.</p> <p>3.5. Ensuring corruption and misuse of power are dealt with effectively.</p>	<ul style="list-style-type: none"> • Whistleblowing Policy to protect individuals who express concerns (Constitution part 5I). • Fraud Response Plan. • Human Resource Policies. • Codes of Conduct for employees and members, as well as the Member and Officer Protocol (all three contained in the Constitution). • Member Code of Conduct Complaint Process (Constitution part 5A). • Legal Team structure with 7FTE.
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Principle B - Ensuring openness and comprehensive stakeholder engagement

Supporting Principles:

1. Openness
2. Engaging comprehensively with Institutional stakeholders
3. Engaging stakeholders effectively, including citizens and service users

Ref	How does the Council achieve this?	Supporting Examples
1	<p>1.1. Ensuring an open culture through demonstrating, documenting and communicating the organisation's commitment to openness.</p> <p>1.2. Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided.</p> <p>1.3. Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact</p>	<ul style="list-style-type: none"> • Data Transparency website page. • Publication Scheme. • Freedom of Information Act. • Public access period after the financial accounts have been completed. • Record of decision making and minutes of Public meetings on website. • Forward Plan. • Corporate Plan. • Committee report templates • Decision making protocol and call-in procedure - Rules of Procedure in the Council's Constitution.

	<p>and consequences of those decisions are clear.</p> <p>1.4. Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/courses of action.</p>	<ul style="list-style-type: none"> • Committee timetable giving dates for submitting, publishing and distributing timely committee reports is adhered to. • Consultation webpage. • Audit and Standards Committee (Article 9 of the Constitution). • Local Government Association – Peer Challenge Review.
2	<p>2.1. Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes are achieved successfully and sustainably.</p> <p>2.2. Developing formal and informal partnerships to allow for resources to be used efficiently and outcomes achieved more effectively.</p> <p>2.3. Ensuring that partnerships are based on:</p> <p>➤ Trust</p>	<ul style="list-style-type: none"> • Consultation webpage. • Customer feedback process. • Nuneaton and Bedworth Community Safety Partnership (NABSCOP) Safer communities • Partnership Framework and Scorecard. • Memorandum of Understanding, Shared Service Agreements, Service Level Agreements.

	<p>➤ A shared commitment to change</p> <p>➤ A culture that promotes and accepts challenge among partners</p> <p>And that the added value of partnership working is explicit.</p>	
3.	<p>3.1. Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve communities, individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes.</p> <p>3.2. Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement.</p> <p>3.3. Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different</p>	<ul style="list-style-type: none"> • Community Forums. • Residents Partnerships. • Consultation webpage. • Customer feedback process. • Member Enquiries. • Petition Scheme (Constitution Part 5K). • Use of Social Media and 'Forms' via website. • Tenant Engagement Strategy.

	<p>backgrounds including reference to future needs</p> <p>3.4. Implementing effective feedback mechanisms in order to demonstrate how views have been taken into account.</p> <p>3.5. Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity.</p> <p>3.6. Taking account of the impact of decisions on future generations of tax payers and service users.</p>	
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Principle C - Defining outcomes in terms of sustainable economic, social, and environmental benefits

Supporting Principles:

1. Defining Outcomes
2. Sustainable economic, social and environmental benefits

Ref	How does the Council achieve this?	Supporting Examples
1	<p>1.1. Having a clear vision, which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the organisation's overall strategy, planning and other decisions.</p> <p>1.2. Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer.</p> <p>1.3. Delivering defined outcomes on a sustainable basis within the resources that will be available.</p> <p>1.4. Identifying and managing risks to achievement of outcomes.</p>	<ul style="list-style-type: none"> • Corporate Plan and annual Delivery Plan. • Service and Business Plans. • Use of PowerBI for performance metrics. • OSP Performance Reports. • Risk Management Policy and Strategy (Constitution part 5P). • Performance Management Framework (Constitution part 5Q). • Borough Plan. • Business Case development and monitoring via Corporate Programme Review Board (CPRB).

	1.5. Managing service users' expectations effectively with regard to determining priorities and making the best use of the resources available.	
2	<p>2.1. Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision.</p> <p>2.2. Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints.</p> <p>2.3. Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs.</p> <p>2.4. Ensuring fair access to services.</p>	<ul style="list-style-type: none"> • Forward Plan. • Committee, Cabinet and Council reports on the website. • Decision making protocol and call-in procedure - Rules of Procedure in the Council's Constitution. • Equality and diversity including policy.

Principle D - Determining the interventions necessary to optimise the achievement of the intended outcomes

Supporting Principles:

1. Determining Interventions
2. Planning Interventions
3. Optimising achievement of intended outcomes

Ref	How does the Council achieve this?	Supporting Examples
1	<p>1.1. Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore ensuring best value is achieved however services are provided.</p> <p>1.2. Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts.</p>	<ul style="list-style-type: none"> • Audit and Standards Committee (Article 9 of the Constitution) and ICO report issued to the Committee. • Rules of Procedure in the Council's Constitution. • Record of decision making and minutes of Public meetings on website. • Consultation webpage. • Customer feedback process.
2	<p>2.1. Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets.</p>	<ul style="list-style-type: none"> • Strategic Risk Register • Operational Risk Register's • Corporate Governance Group

<p>2.2. Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered.</p> <p>2.3. Considering and monitoring risks facing each partner when working collaboratively, including shared risks.</p> <p>2.4. Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances.</p> <p>2.5. Establishing appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured.</p> <p>2.6. Ensuring capacity exists to generate the information required to review service quality regularly.</p> <p>2.7. Preparing budgets in accordance with objectives, strategies and the medium term financial plan.</p> <p>2.8. Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy.</p>	<ul style="list-style-type: none"> • Annual Governance Statement. • Corporate Executive Team and Senior Leadership Team. • Consultation webpage. • Customer feedback process. • Risk Management Policy and Strategy (Constitution part 5P). • Performance Management Framework (Constitution part 5Q). • Emergency Planning and Business Continuity Plan. • Medium Term Financial Plan. • HRA Business Plan.
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3	<p>3.1. Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints.</p> <p>3.2. Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term.</p> <p>3.3. Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage.</p> <p>3.4. Ensuring the achievement of 'social value' through service planning and commissioning.</p>	<ul style="list-style-type: none"> • Budget Book. • Medium Term Financial Plan. • HRA Business Plan. • Corporate Plan and annual Delivery Plan. • Quarterly Budget Monitoring Reports issued to Cabinet, including outturn reports following a financial year. • Contract Procedure Rules (Constitution part 4G) include Social Value Act requirements as well as the Procurement and Accounts Payable Strategy. • Financial Procedure Rules (Constitution part 4F).
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Principle E - Developing the Council's capacity, including the capability of its leadership and the individuals within it

Supporting Principles:

1. Developing the Council's capacity
2. Developing the capability of the entity's leadership and other individuals

Ref	How does the Council achieve this?	Supporting Examples
1	<p>1.1. Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness.</p> <p>1.2. Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently.</p> <p>1.3. Recognising the benefits of partnerships and collaborative working where added value can be achieved.</p> <p>1.4. Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources.</p>	<ul style="list-style-type: none"> • Corporate Plan and annual Delivery Plan. • OSP Performance Reports. • Partnership Framework and Scorecard. • People Strategy (in development).
2	<p>2.1. Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early</p>	<ul style="list-style-type: none"> • Scheme of Delegation in the Constitution.

<p>on in the relationship and that a shared understanding of roles and objectives is maintained.</p> <p>2.2. Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body.</p> <p>2.3. Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's authority.</p> <p>2.4. Developing the capabilities of members and senior management to achieve effective leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by:-</p> <ul style="list-style-type: none"> - Ensuring members and staff have access to appropriate induction tailored to their role and that on-going training and development matching individual and organisational requirements is available and encouraged. 	<ul style="list-style-type: none"> • Constitution. • Induction for new members and staff on the standard of behaviour expected. • Annual Development Reviews for employees. • Council Values (2.2 of the Code). • Corporate Executive Team and Senior Leadership Team. • Community Forums. • Residents Partnerships. • Consultation webpage. • Customer feedback process. • Petition Scheme (Constitution Part 5K). • Audit and Standards Committee (Article 9 of the Constitution). • Human Resource Policies.
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	<ul style="list-style-type: none"> - Ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis - Ensuring personal, organisational and system-wide development through shared learning, including lessons learned from governance weaknesses both internal and external. <p>2.5. Ensuring that there are structures in place to encourage public participation.</p> <p>2.6. Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections.</p> <p>2.7. Holding staff to account through regular performance reviews which take account of training or development needs.</p> <p>2.8. Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing.</p>	<ul style="list-style-type: none"> • Member Officer Protocol (Constitution Part 5C). • Employee Support Officers, Mental Health First Aiders, Counselling for Officers and Occupational Health Referrals.
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Principle F - Managing risks and performance through robust internal control and strong public financial management

Supporting Principles:

1. Managing Risk
2. Managing Performance
3. Robust Internal Control
4. Managing data
5. Strong public financial management

Ref	How does the Council achieve this?	Supporting Examples
1	<p>1.1. Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making.</p> <p>1.2. Implementing robust and integrated risk management arrangements and ensuring that they are working effectively.</p> <p>1.3. Ensuring that responsibilities for managing individual risks are clearly allocated.</p>	<ul style="list-style-type: none"> • Strategic Risk Register • Operational Risk Register's • Corporate Governance Group • Corporate Executive Team and Senior Leadership Team. • Risk Management Policy and Strategy (Constitution part 5P). • Audit and Standards Committee (Article 9 of the Constitution). • Internal Audit & External Audit.

2	<p>2.1. Monitoring service delivery effectively including planning, specification, execution and independent post implementation review.</p> <p>2.2. Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation’s financial, social and environmental position and outlook.</p> <p>2.3. Ensuring an effective scrutiny or oversight function is in place which provides constructive challenge and debate on policies and objectives before, during and after decisions are made, thereby enhancing the organisation’s performance and that of any organisation for which it is responsible</p> <p>(Or for a committee system)</p> <p>Encouraging effective and constructive challenge and debate on policies and objectives to support balanced and effective decision making.</p> <p>2.4. Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement.</p> <p>2.5. Ensuring there is consistency between specification stages (such as budgets) and</p>	<ul style="list-style-type: none"> • Performance Management Framework (Constitution part 5Q). • Corporate Plan and annual Delivery Plan. • OSP Performance Reports. • Rules of Procedure in the Council’s Constitution. • Record of decision making and minutes of Public meetings on website. • Forward Plan. • Committee report templates. • Service and Business Plans. • Overview and Scrutiny Panels (Constitution part 4E). • Quarterly Budget Monitoring Reports issued to Cabinet, including outturn reports following a financial year.
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	post implementation reporting (e.g. financial statements).	
3	<p>3.1. Aligning the risk management strategy and policies on internal control with achieving objectives</p> <p>3.2. Evaluating and monitoring risk management and internal control on a regular basis</p> <p>3.3. Ensuring effective counter fraud and anti-corruption arrangements are in place</p> <p>3.4. Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor</p> <p>3.5. Ensuring an audit committee or equivalent group/function, which is independent of the executive and accountable to the governing body:-</p> <ul style="list-style-type: none"> ➤ Provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment. ➤ That its recommendations are listened to and acted upon. 	<ul style="list-style-type: none"> • Risk Management Policy and Strategy (Constitution part 5P). • Audit and Standards Committee (Article 9 of the Constitution). • Internal Audit & External Audit. • Anti-fraud and Corruption Policy (Constitution part 4I) and a Fraud Response Plan. • Anti-money Laundering Framework (Constitution part 4J). • Co-opted member on Audit and Standards Committee and each OSP.

4	<p>4.1. Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data.</p> <p>4.2. Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies.</p> <p>4.3. Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring.</p>	<ul style="list-style-type: none"> • Data Protection Officer. • Privacy Notices. • Information Management Group (internal officer group). • Access to Information Procedure Rules (Constitution part 4B).
5	<p>5.1. Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance.</p> <p>5.2. Ensuring well developed financial management is integrated at all levels of planning and control, including management of financial risks and controls.</p>	<ul style="list-style-type: none"> • Budget Book. • Medium Term Financial Plan. • HRA Business Plan. • Corporate Plan and annual Delivery Plan. • Quarterly Budget Monitoring Reports issued to Cabinet, including outturn reports following a financial year. • Financial Procedure Rules (Constitution part 4F). • Audit and Standards Committee (Article 9 of the Constitution).

		<ul style="list-style-type: none">• Internal Audit & External Audit.• Anti-fraud and Corruption Policy (Constitution part 4I) and a Fraud Response Plan.• Anti-money Laundering Framework (Constitution part 4J).• Treasury Management Strategy and Plan.
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Principle G - Implementing good practices in transparency, reporting, and audit to deliver effective accountability

Supporting Principles:

1. Implementing good practice in transparency
2. Implementing good practices in reporting
3. Assurance and effective accountability

Ref	How does the Council achieve this?	Supporting Examples
1	<p>1.1. Writing and communicating reports for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate.</p> <p>1.2. Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand.</p>	<ul style="list-style-type: none"> • OSP Performance Reports. • Rules of Procedure in the Council’s Constitution. • Record of decision making and minutes of Public meetings on website. • Forward Plan. • Corporate Plan. • Committee report templates. • Budget Book • Medium Term Financial Plan • HRA Business Plan

		<ul style="list-style-type: none"> • Corporate Plan and annual Delivery Plan. • Quarterly Budget Monitoring Reports issued to Cabinet, including outturn reports following a financial year. • Data Transparency website page. • Publication Scheme. • Freedom of Information Act.
2	<p>2.1. Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way.</p> <p>2.2. Ensuring members and senior management own the results reported.</p> <p>2.3. Ensuring robust arrangements for assessing the extent to which the principles contained in this Framework have been applied and publishing the results on this assessment, including an action plan for improvement and evidence to demonstrate good governance (the annual governance statement).</p>	<ul style="list-style-type: none"> • Audit and Standards Committee (Article 9 of the Constitution). • Internal Audit & External Audit. • Annual Governance Statement. • Statement of Accounts. • Public Inspection of the Accounts.

	<p>2.4. Ensuring that this Framework is applied to jointly managed or shared service organisations as appropriate.</p> <p>2.5. Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations.</p>	
3	<p>3.1. Ensuring that recommendations for corrective action made by external audit are acted upon.</p> <p>3.2. Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon.</p> <p>3.3. Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations.</p> <p>3.4. Gaining assurance on risk associated with delivering services through third parties and that this is evidenced in the annual governance statement.</p> <p>3.5. Ensuring that when working in partnership, arrangements for</p>	<ul style="list-style-type: none"> • Audit and Standards Committee (Article 9 of the Constitution). • Internal Audit & External Audit. • Internal Audit Charter. • Compliance with the Public Sector Internal Audit Standards. • Annual Audit Opinion. • Memorandum of Understanding, Shared Service Agreements, Service Level Agreements.

	accountability are clear and the need for wider public accountability has been recognised and met.	
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Nuneaton & Bedworth



Local Code Corporate Governance

Introduction

In July 2014 CIPFA, in association with the International Federation of Accountants (IFAC), published the International Framework: Good Governance in the Public Sector. The International Framework supersedes the 2004 CIPFA/OPM Good Governance Standard for the Public Services. It places the attainment of sustainable economic, societal, and environmental outcomes as a key focus of governance structures and processes and stresses the importance of taking account of the impact of current decisions and actions on future generations.

The core principles and sub-principles from the International Framework have been interpreted for a local government context in Delivering Good Governance in Local Government: Framework (CIPFA/Solace 2016).

Nuneaton and Bedworth Borough Council is committed to the principles of good governance and aims to demonstrate its ongoing commitment through the development and adoption of a Local Code of Corporate Governance in line with the CIPFA/Solace 2016 Framework. This document, which is Nuneaton and Bedworth Borough Council's "Local Code of Corporate Governance", therefore sets out and describes the Council's commitment to corporate governance, and to ensure its effective implementation and application in all areas of the Council's work.

What is Good Governance?

Nuneaton and Bedworth Borough Council has adopted the definition of Corporate Governance as stated in the International Framework: Good Governance in the Public Sector (CIPFA/IFAC 2014) (the 'International Framework') which defines governance as:

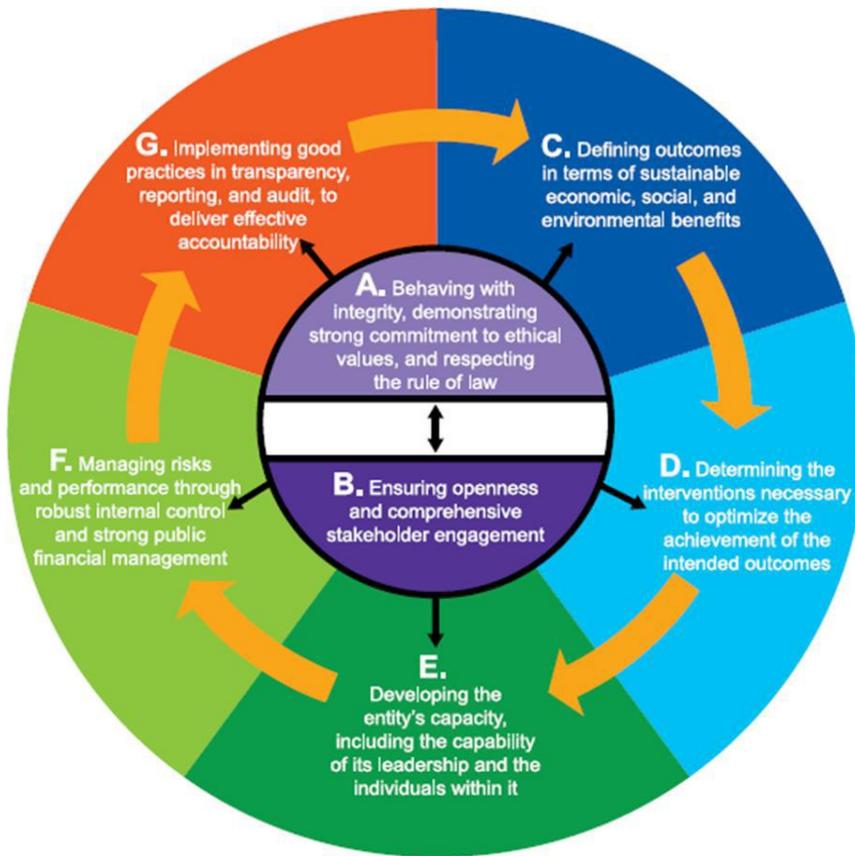
'The arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved'.

The International Framework also states that to deliver good governance in the public sector both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times.

Acting in the public interest implies primary consideration of the benefits for society, which should result in positive outcomes for service users and other stakeholders.

Principles of Good Governance

The diagram below, taken from the International Framework, illustrates the principles of good governance in the public sector and how they relate to each other. Nuneaton and Bedworth Borough Council positively recognises and accepts these underlying principles of good governance.



Principles A and B permeate implementation of principles C to G. The diagram also illustrates that good governance is dynamic, and that an entity as a whole should be committed to improving governance on a continuing basis through a process of evaluation and review.

Responsibilities

Elected members are collectively responsible for the governance of Nuneaton and Bedworth Borough Council. The responsibilities include:

- Agreeing the Council’s constitution, comprising the key governance documents including the executive arrangements and making major changes to reflect best practice;
- Agreeing the policy framework including key strategies and agreeing the budget;
- Appointing the chief officers; and
- Appointing committees responsible for overview and scrutiny functions, audit and regulatory matters and also appointing members to them.

The Council’s Management Team and other Senior Managers are responsible for:

- Advising the Cabinet and other committees on legislative, financial and other policy considerations to achieve the aims and objectives of Nuneaton and Bedworth Borough Council;
- Implementing councillors decisions; and

- Service performance.

Annual Review and Reporting

Nuneaton and Bedworth Borough Council is required to prepare an annual governance statement in order to report publicly on the extent to which it complies with its code of governance. This includes how it has monitored and evaluated the effectiveness of its governance arrangements in the year, and on any planned changes in the coming period. The process of preparing the governance statement should in itself add value to the effectiveness of the governance and internal control framework.

The annual governance statement includes:

- An acknowledgment of responsibility for ensuring that there is a sound system of governance, incorporating the system of internal control, and reference to the Council's code of governance;
- Reference to and assessment of the effectiveness of the key elements of the governance framework and the role of those responsible for the development and maintenance of the governance environment, such as the Management team, the Audit Committee, Internal Audit and others as appropriate;
- An opinion on the level of assurance that the governance arrangements can provide and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework;
- An action plan showing actions taken, or proposed, to deal with significant governance issues; reference to how issues raised in the previous year's annual governance statement have been resolved; and
- A conclusion.

Nuneaton and Bedworth Borough Council's annual governance statement shall be approved by the Council's audit committee and shall be published with the statement of accounts. The approved statement shall be signed by the Leader and the Executive Director – Operations is the Head of Paid Service.

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
<p>A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law</p> <p>Local government organisations are accountable not only for how much they spend but also for how they use the resources under their stewardship. This includes accountability for outputs, both positive and negative, and for the outcomes they have achieved. In addition, they have an overarching responsibility to serve the public interest in adhering to the requirements of legislation and government policies. It is essential that, as a whole, they can demonstrate the appropriateness of all of their actions across all activities and have mechanisms in place to encourage and enforce adherence to ethical values and to respect the rule of law.</p>	<p>Behaving with integrity</p> <ul style="list-style-type: none"> • Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation • Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles) • Leading by example and using the above standard operating principles or values as a framework for decision making and other actions 	<ul style="list-style-type: none"> • Codes of Conduct for employees and members • Induction for new members and staff on the standard of behaviour expected • Annual Personal Development Reviews for employees • Protocol for member and employee relations • Employee vision and values • Codes of Conduct for members and employees • Corporate Plan key aims and priorities • Declarations of interests made at all meetings which are documented in the minutes • Meeting Protocols • Audit and Standards Committee • Rules of Procedure in the Council’s Constitution

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively <p>Demonstrating strong commitment to ethical values</p> <ul style="list-style-type: none"> • Seeking to establish, monitor and maintain the organisation’s ethical standards and performance 	<ul style="list-style-type: none"> • Register gifts and hospitality for members and employees, which is published on the Council’s website • Register of interests for members • Anti-fraud and Corruption Policy and Fraud Response Plan • Whistleblowing Policy to protect individuals who express concerns • Whistleblowing officer appointed to be a first point of contact • Members and employees Code of Conduct requires all interests to be declared • Minutes of meetings demonstrate that declarations of interest have been declared <ul style="list-style-type: none"> • Scrutiny of decision making process and call-in procedure • Audit and Standards Committee review gifts and hospitality register and declarations of interest annually • Robust recruitment and selection process

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation’s culture and operation • Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values • Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with ethical standards expected by the organisation 	<ul style="list-style-type: none"> • Employee vision and values • Codes of Conduct for employees and members • Annual Development Reviews for employees • One of the aims of the Annual Development Review is for employees to understand their role in the context of the Council’s aims and values • Procurement Policies • Contract Procedure Rules • Selection and Recruitment Policy • Partnership Framework which provides guidance to support the planning and delivery of effective partnership working and to ensure that any partnerships the Council is involved in are managed with appropriate governance arrangements • Procurement Policies • Contract Procedure Rules • Procurement Strategy and Toolkit

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<p>Respecting the rule of law</p> <ul style="list-style-type: none"> • Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations • Creating the conditions to ensure that the statutory officers, other key post holders, and members, are able to fulfil their responsibilities in accordance with legislative and regulatory requirements 	<ul style="list-style-type: none"> • Corporate e-procurement system • Contracts database • Council’s Constitution, which now includes all governance related policies • Codes of Conduct for employees and members • Job descriptions and specifications • Monitoring Officer Protocol in the Council’s Constitution • Protocol for the Offices of the Mayor and Deputy Mayor • Codes of Conduct for employees and members • Functions of the Monitoring Officer and the Chief Financial Officer as set out in the Constitution includes ensuring the lawfulness, fairness and financial prudence of decision making • The Executive Director - Resources is designated as the s151 officer

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders • Dealing with breaches of legal and regulatory provisions effectively • Ensuring corruption and misuse of power are dealt with effectively 	<ul style="list-style-type: none"> • Delegated decisions taken by officers are recorded and published on the Council’s website • Functions of the Monitoring Officer • Audit and Standards Committee • Anti-Fraud, Corruption and Bribery Policy • Fraud Response Plan • Disciplinary Policy • Codes of Conduct for employees and members
<p>B. Ensuring openness and comprehensive stakeholder engagement</p> <p>Local government is run for the public good, organisations therefore should ensure openness in their activities. Clear trusted channels of communication and consultation should be used to engage effectively with all groups of stakeholders, such as individual citizens and service users, as well as institutional stakeholders.</p>	<p>Openness</p> <ul style="list-style-type: none"> • Ensuring an open culture through demonstrating, documenting and communicating the organisation’s commitment to openness • Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for 	<ul style="list-style-type: none"> • Data Transparency website page • Freedom of Information Act • Online information • Public access period after the financial accounts have been completed • Record of decision making • Forward Plan • Minutes of Committee meetings published on the Council’s website

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<p>the reasoning for keeping a decision confidential should be provided</p> <ul style="list-style-type: none"> • Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear • Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/courses of action 	<ul style="list-style-type: none"> • Business case is required for all major projects • Post project reviews reported to the Corporate Asset Management Team (CAMT) • Corporate Plan and Corporate Plan Delivery Plan • Committee report templates • Decision making protocol and call-in procedure • Committee timetable giving dates for submitting, publishing and distributing timely committee reports is adhered to • Surveys completed e.g. equalities and satisfaction with parks and open spaces • Borough Plan consultations • Communication Strategy ‘Loud and Clear’ • Lean systems methodology

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<p>Engaging comprehensively with institutional stakeholders NB institutional stakeholders are the other organisations that local government needs to work with to improve services and outcomes (such as commercial suppliers and partners as well as other public or third sector organisations) or organisations to which they are accountable.</p> <ul style="list-style-type: none"> • Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes are achieved successfully and sustainably • Developing formal and informal partnerships to allow for resources to be used efficiently and outcomes achieved more effectively 	<ul style="list-style-type: none"> • Borough Plan consultations • Communication Strategy ‘Loud and Clear’ • Regular meetings with other stakeholders e.g. Warwickshire County Council and Police • Examples of effective partnerships e.g. Building Control, Procurement, Insurance, Vehicle Maintenance and Commercial Waste • NABCEL • Heart Partnership

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Ensuring that partnerships are based on: <ul style="list-style-type: none"> ➤ Trust ➤ A shared commitment to change ➤ A culture that promotes and accepts challenge among partners <p>And that the added value of partnership working is explicit</p> <p>Engaging with individual citizens and service users effectively</p> <ul style="list-style-type: none"> • Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve communities, individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes • Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement 	<ul style="list-style-type: none"> • Partnership Framework • Partnership Agreements • Service Level Agreements • Data Sharing Protocols <ul style="list-style-type: none"> • Partnership Framework • Borough Plan • Communication Strategy ‘Loud and Clear’ • Customer feedback sought at the point of delivery • Lean systems methodology <ul style="list-style-type: none"> • Communication Strategy ‘Loud and Clear’ • Use of Twitter social media • In-touch magazine

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs • Implementing effective feedback mechanisms in order to demonstrate how views have been taken into account • Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity • Taking account of the impact of decisions on future generations of tax payers and service users 	<ul style="list-style-type: none"> • Communication Strategy ‘Loud and Clear’ • Surveys undertaken with residents • Service related questionnaires • Elected Member surgeries • Communication Strategy ‘Loud and Clear’ • Community Forums • Residents Partnerships • Community Action Network • Community asset transfer
<p>C. Defining outcomes in terms of sustainable economic, social and environmental benefits</p> <p>The long term nature and impact of many of local government’s responsibilities mean</p>	<p>Defining outcomes</p> <ul style="list-style-type: none"> • Having a clear vision, which is an agreed formal statement of the organisation’s purpose and intended outcomes containing appropriate 	<ul style="list-style-type: none"> • Corporate Plan and Corporate Plan Delivery Plan • TEN performance management system

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
<p>that it should define and plan outcomes and that these should be sustainable. Decisions should further the organisation’s purpose, contribute to intended benefits and outcomes, and remain within the limits of authority and resources. Input from all groups of stakeholders, including citizens, service users, and institutional stakeholders, is vital to the success of this process and in balancing competing demands when determining priorities for the finite resources available.</p>	<p>performance indicators, which provide the basis for the organisation’s overall strategy, planning and other decisions</p> <ul style="list-style-type: none"> • Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer • Delivering defined outcomes on a sustainable basis within the resources that will be available • Identifying and managing risks to achievement of outcomes • Managing service users’ expectations effectively with regard to determining priorities and making the best use of the resources available 	<ul style="list-style-type: none"> • Management Team performance reports • Corporate Plan and Corporate Plan Delivery Plan • Community engagement • Corporate Plan Delivery Plan • Risk Management Policy and Strategy • Integrated Finance and Performance reports • Corporate Plan Delivery Plan • Integrated Finance and Performance Reports • Lean system reviews

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<p>Sustainable economic, social and environmental benefits</p> <ul style="list-style-type: none"> • Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision • Taking a longer term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation’s intended outcomes and short term factors such as the political cycle or financial constraints • Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs • Ensuring fair access to services 	<ul style="list-style-type: none"> • Report templates and summaries which consider the impact of the proposed decision and all other options available • Record of the decision in minutes and supporting materials • Discussion between members and officers at meetings on the information needs of members to support the decision making process • Communication Strategy ‘Loud and Clear’ • Borough Plan • Cemetery provision • Equality Policy • Equality Impact Assessments

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
<p>D. Determining the interventions necessary to optimise the achievement of the intended outcomes</p> <p>Local government achieves its intended outcomes by providing a mixture of legal, regulatory, and practical interventions (courses of action). Determining the right mix of these courses of action is a critically important strategic choice that local government has to make to ensure intended outcomes are achieved. They need robust decision making mechanisms to ensure that their defined outcomes can be achieved in a way that provides the best trade-off between the various types of resource inputs while still enabling effective and efficient operations. Decisions made need to be reviewed frequently to ensure that achievement of outcomes is optimised.</p>	<p>Determining interventions</p> <ul style="list-style-type: none"> • Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore ensuring best value is achieved however services are provided • Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts <p>Planning interventions</p> <ul style="list-style-type: none"> • Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets 	<ul style="list-style-type: none"> • Report templates and summaries which consider the impact of the proposed decision including associated risks and option appraisals • Discussion between members and officers at meetings on the information needs of members to support the decision making process • Lean systems methodology • Audit and Standards Committee reports on complaints received by the Ombudsman • Integrated Finance and Performance Reports • Review of the Risk Registers • Corporate Governance Group • Management Team

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered • Considering and monitoring risks facing each partner when working collaboratively, including shared risks • Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances • Establishing appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured 	<ul style="list-style-type: none"> • Health and Safety Co-ordinators Group (HASCOG) • Communication Strategy ‘Loud and Clear’ • Lean system reviews • Surveys with residents • Borough Plan consultation exercises • Select Committees • Partnership Framework • Risk Management Policy and Strategy • Strategic and Operational Risk Registers • Business Continuity Plans • Strategic and Tactical Co-ordinating Groups • Performance Management Framework • TEN performance management system

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Ensuring capacity exists to generate the information required to review service quality regularly • Preparing budgets in accordance with objectives, strategies and the medium term financial plan • Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy <p>Optimising achievement of intended outcomes</p> <ul style="list-style-type: none"> • Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints 	<ul style="list-style-type: none"> • Performance management reports to the management team and scrutiny panels • Dedicated Performance and Risk Management Officer • 2 Executive Directors and 4 Directors • 30 plus Senior Managers • TEN system • Evidence that budgets, plans and objectives are aligned • Medium Term Financial Plan • HRA Business Plan covering revenue, capital and debt repayment over the next 30 years • Medium Term Financial Plan • Corporate Plan Delivery Plan • HRA Business Plan

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term • Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage • Ensuring the achievement of ‘social value’ through service planning and commissioning 	<ul style="list-style-type: none"> • Budget Book • Medium Term Financial Plan • HRA Business Plan • Integrated Finance and Performance Reports • Contract Procedure Rules cover Social Value Act, which is the additional benefits to the community, over and above the direct purchasing of goods and services
<p>E. Developing the entity’s capacity, including the capability of its leadership and the individual within it</p> <p>Local government needs appropriate structures and leadership, as well as people with the right skills, appropriate qualifications and mind set, to operate</p>	<p>Developing the entity’s capacity</p> <ul style="list-style-type: none"> • Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness 	<ul style="list-style-type: none"> • Integrated Finance and Performance Reports • Corporate Plan Delivery Plan

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
<p>efficiently and effectively and achieve intended outcomes within the specified periods. A local government organisation must ensure that it has both the capacity to fulfil its own mandate and to make certain that there are policies in place to guarantee that its management has the operational capacity for the organisation as a whole. Because both individuals and the environment in which an organisation operates will change over time, there will be a continuous need to develop its capacity as well as the skills and experience of individual staff members. Leadership in local government is strengthened by the participation of people with many different types of backgrounds, reflecting the structure and diversity of communities</p>	<ul style="list-style-type: none"> • Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently • Recognising the benefits of partnerships and collaborative working where added value can be achieved • Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources <p>Developing the capability of the entity's leadership and other individuals</p> <ul style="list-style-type: none"> • Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained 	<ul style="list-style-type: none"> • Benchmarking is being introduced as part of the performance management reports • Partnership Framework • Reports to members on key partnerships • Workforce plan • Planning for the future • Executive Directors job descriptions are endorsed by the Leader • Leader sits and chairs the ED's interview panel • Regular monthly meetings between the ED's and Leader to discuss the

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body • Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's authority • Developing the capabilities of members and senior management to achieve effective leadership and to enable the organisation to respond successfully to changing legal and 	<p>Authority's direction, vision and leadership</p> <ul style="list-style-type: none"> • Monthly Informal Cabinet meetings discuss matters of importance e.g. budget issues and future direction • Scheme of Delegation • Constitution • Respective roles and responsibilities included within the Constitution

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<p>policy demands as well as economic, political and environmental changes and risks by:-</p> <ul style="list-style-type: none"> ➤ Ensuring members and staff have access to appropriate induction tailored to their role and that on-going training and development matching individual and organisational requirements is available and encouraged ➤ Ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis ➤ Ensuring personal, organisational and system-wide development through shared 	<ul style="list-style-type: none"> • Induction programme • Mandatory training programmes for employees and Elected Members • Annual Development Reviews for employees • Learning and Development Strategy • Mentoring Policy • Schedule of training events • Annual Development Reviews for employees • Senior management conferences every quarter • Mandatory Corporate Governance training for employees and Elected Members • Mandatory Finance training programme • Succession planning • Mandatory Corporate Governance training for employees and Elected Members

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<p>learning, including lessons learned from governance weaknesses both internal and external</p> <ul style="list-style-type: none"> • Ensuring that there are structures in place to encourage public participation • Taking steps to consider the leadership’s own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections • Holding staff to account through regular performance reviews which take account of training or development needs 	<ul style="list-style-type: none"> • Communication Strategy ‘Loud and Clear’ • Public access period after the financial accounts have been completed • Meet every 6 weeks with other Chief Executives across Warwickshire to share best practice and discuss issues affective districts, also invite guest speakers if necessary • Internal and external audit reports to Audit and Standards Committee • All Members receive Audit and Standards Committee reports • Annual Development Reviews for employees • Staff development plans linked to ADR’s • HR Policies and Procedures

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing 	<ul style="list-style-type: none"> HR Policies and Procedures, including Agile Working, Alcohol and Substance Misuse and Stress Management Alcohol and Drug random tests for employees Employee Support Officers
<p>F. Managing risks and performance through robust internal control and strong public financial management</p> <p>Local government needs to ensure that the organisations and governance structures that it oversees are implemented, and can sustain an effective performance management system that facilitates effective and efficient delivery of planned services. Risk management and internal control are important and integral parts of a performance management system and are crucial to the achievement of outcomes. Risk should be considered and addressed as part of all decision making activities. A strong system of financial management is essential for the implementation of policies and the achievement of intended outcomes, as it will enforce financial discipline, strategic allocation of resources, efficient service delivery and accountability.</p>	<p>Managing risk</p> <ul style="list-style-type: none"> Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making Implementing robust and integrated risk management arrangements and ensuring that they are working effectively Ensuring that responsibilities for managing individual risks are clearly allocated <p>Managing performance</p> <ul style="list-style-type: none"> Monitoring service delivery effectively including planning, specification, execution and 	<ul style="list-style-type: none"> Risk Management Policy and Strategy Strategic and Operational Risk Registers Risk Management Policy and Strategy reviewed and updated every 2 years Risk management included in the internal audit plan Roles and responsibilities included in the Risk Management Policy and Strategy Risk Registers identify risk owners Corporate Plan Delivery Plan Integrated Finance and Performance Reports

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
<p>It is also essential that a culture and structure for scrutiny are in place as a key part of accountable decision making, policy making and review. A positive working culture that accepts, promotes and encourages constructive challenge is critical to successful scrutiny and successful service delivery. Importantly, this culture does not happen automatically, it requires repeated public commitment from those in authority.</p>	<p>independent post implementation review</p> <ul style="list-style-type: none"> • Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation’s financial, social and environmental position and outlook • Ensuring an effective scrutiny or oversight function is in place which provides constructive challenge and debate on policies and objectives before, during and after decisions are made, thereby enhancing the organisation’s performance and that of any organisation for which it is responsible (Or for a committee system) Encouraging effective and constructive challenge and debate on policies and objectives to support balanced and effective decision making 	<ul style="list-style-type: none"> • Risk implications included in report templates • Discussion between members and officers at meetings on the information needs of members to support the decision making process • Role and responsibilities of Scrutiny Panels included in the Constitution • Training for members on the scrutiny function • Agenda and minutes of scrutiny meetings • Call-in procedure

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement • Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements) <p>Robust internal control</p> <ul style="list-style-type: none"> • Aligning the risk management strategy and policies on internal control with achieving objectives • Evaluating and monitoring risk management and internal control on a regular basis • Ensuring effective counter fraud and anti-corruption arrangements are in place 	<ul style="list-style-type: none"> • Performance management reports, which includes progress against Corporate Plan Delivery Plan • Financial Regulations and Standing Orders • Financial standards and guidance • Budget and Policy Framework • Treasury Management Policy • Risk Management Policy and Strategy • Internal audit plans • Internal audit reports • Risk Management Policy and Strategy updated every 2 years and any changes are formally approved by the Audit and Standards Committee • Internal audit plans • Internal audit reports • Anti-fraud, Corruption and Bribery Strategy • Fraud Response Plan • Anti-money Laundering Policy

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor • Ensuring an audit committee or equivalent group/function, which is independent of the executive and accountable to the governing body:- <ul style="list-style-type: none"> ➤ Provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment ➤ That its recommendations are listened to and acted upon <p>Managing data</p> <ul style="list-style-type: none"> • Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data 	<ul style="list-style-type: none"> • Annual Governance Statement • Corporate governance included in internal audit plans • Annual review of the effectiveness of internal audit • Audit and Standards Committee has 11 elected and 2 independent members • No member of the Cabinet or Chair of a Scrutiny Panel can sit on the Audit and Standards Committee • Terms of reference in Constitution comply with CIPFA best practice • Chair and independent members sit on the Audit and Standards Committee for a 4 year term to ensure consistency • Training programme • Data Protection Officer in post • Data Protection Policy • Information Management Framework • Privacy Notices on website • Access to Information Procedure Rules

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies • Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring <p>Strong public financial management</p> <ul style="list-style-type: none"> • Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance • Ensuring well developed financial management is integrated at all levels of planning and control, including management of financial risks and controls 	<ul style="list-style-type: none"> • Senior Information Risk Owner and Deputy appointed • Corporate Governance Group have taken on the role of the Corporate Information Governance Group • Information Management Group • Data sharing agreements in place • Privacy Notices • Annual data quality audits • Medium Term Financial Plan • Capital programme • Budget monitoring reports • Regular reports to management team, which include any spend pressures • Risk based review of reserves

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
<p>G. Implementing good practices in transparency, reporting and audit to deliver effective accountability</p> <p>Accountability is about ensuring that those making decisions and delivering services are answerable for them. Effective accountability is concerned not only with reporting on actions completed, but also ensuring that stakeholders are able to understand and respond as the organisation plans and carries out its activities in a transparent manner. Both external and internal audit contribute to effective accountability.</p>	<p>Implementing good practice in transparency</p> <ul style="list-style-type: none"> • Writing and communicating reports for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate • Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand <p>Implementing good practices in reporting</p> <ul style="list-style-type: none"> • Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way 	<ul style="list-style-type: none"> • Report templates • Agendas, reports and minutes available on the Council’s website • Transparency Code • Access to information page on website • Access to Information Procedure Rules • Annual financial statements, including narrative report and annual governance statement • VFM conclusion by the Council’s external auditor

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<ul style="list-style-type: none"> • Ensuring members and senior management own the results reported • Ensuring robust arrangements for assessing the extent to which the principles contained in this Framework have been applied and publishing the results on this assessment, including an action plan for improvement and evidence to demonstrate good governance (the annual governance statement) • Ensuring that this Framework is applied to jointly managed or shared service organisations as appropriate • Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations 	<ul style="list-style-type: none"> • Annual financial statements are approved by elected members • Annual Governance Statement • Local Code Corporate Governance • Annual Governance Statement • External audit reports

Principles of Good Governance (in bold)	Sub Principles (in bold) and behaviours and actions that demonstrate good governance in practice	Examples of systems, processes, documentation and other evidence demonstrating compliance
	<p>Assurance and effective accountability</p> <ul style="list-style-type: none"> • Ensuring that recommendations for corrective action made by external audit are acted upon • Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon • Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations • Gaining assurance on risk associated with delivering services through third parties and that this is evidenced in the annual governance statement • Ensuring that when working in partnership, arrangements for accountability are clear and the need for wider public accountability has been recognised and met 	<ul style="list-style-type: none"> • Reports to Audit and Standards Committee • Internal Audit Charter • Compliance with the Public Sector Internal Audit Standards • Annual review of the effectiveness of internal audit • External review of the internal audit service at least once every 5 years • Compliance with Public Sector Internal Audit Standards • Annual Governance Statement • Partnership Framework • Communication Strategy ‘Loud and Clear’

AGENDA ITEM NO. 13

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Audit and Standards Committee
Date of Meeting:	17 March 2026
Subject:	Member Induction Programme 2026
Portfolio:	Not Applicable
Responsible Officer:	Assistant Director – Democracy and Governance
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Strive for transparency and accountability, in all that we do. Increase public scrutiny
Ward Relevance:	NA
Public or Private:	Public
Forward Plan:	Public Forward Plan: Not applicable (not for Cabinet)
Subject to Call-in:	Public Forward Plan: Not applicable (not for Cabinet)

1. Purpose of report
 - 1.1. The purpose of this report is to provide the Audit and Standards Committee (the Committee) details of the Member Induction Programme from May 2026 for the Committee's consideration, comment and approval.
2. Recommendations
 - 2.1. It is recommended that the Audit and Standards Committee:
 - a) Considers and approves the Member Induction Programme for 2026.

b) Considers other potential opportunities to deliver and promote learning and development opportunities for Members.

3. Background

- 3.1. Local elections are scheduled for 7 May 2026 and there will therefore be the need to deliver a comprehensive range of training and information briefing sessions to both newly elected and returning Members.
- 3.2. A Member Development Induction Programme (the Programme) has been drafted.

4. Body of report and reason for recommendations

- 4.1. The responsibilities of the Committee include advising, training, or arranging training for Members, and co-opted Members of the Council. Member training is a wide issue and it is important that there is oversight of the Member training programme to ensure that Members have the skills they need to support effective decision making.
- 4.2. Member development includes training and development opportunities as well as activities, programmes and briefings that are offered to elected Members by Nuneaton and Bedworth Borough Council which support Members to carry out their roles effectively. A well-designed training programme helps to ensure decision making is robust and contributes to the effective management of risks identified by the Council.
- 4.3. The purpose of the Member Development Induction Programme is to induct newly elected and returning Members in their roles in Council services, governance and decision making and how they can be effective in their roles as community leaders.

Aims and Objectives

- 4.4 The aims and objectives of the proposed Programme are to:
- Provide Members with the tools and ongoing skills they need to mobilise local communities, grow community capacity, support local innovation and to be able to take important decisions and represent their constituents.
 - Ensure that Members have equal access to training and development opportunities, providing extra resources to accommodate those with special requirements.
 - Support a consistent approach to learning and development for Members.
 - Ensure Members have a good understanding of the current challenges and opportunities faced by both Local Government and the Council.
 - Ensure Members have a clear focus of important issues.
 - Ensure Members have a widespread understanding of respective roles and different perspectives.

- Ensure Members have individual awareness of roles and responsibilities, with the tools necessary to discharge them effectively.
- Ensure that Members have a robust understanding of the processes involved in decision making and can discharge their responsibilities effectively.
- Ensure Members have an individual and collective awareness of behaviour and its impact, helping to create a strong, effective, constructive culture, with trust and respect.
- Ensure that Member development is led jointly by Members and Officers.

4.5 The Programme will ensure Members are:

- Provided with development opportunities to acquire and further develop the skills needed to fulfil their roles.
- Provided with ICT hardware and are provided with support and training, where needed, in maximising the use of ICT devices and developing their technology skills.
- Introduced to the Strategic Leadership Team, Senior Officer, and other relevant officers.
- Provided with key information that promote effective Member and Officer relationships.

4.6 The Programme includes:

- Member Induction event
- Market Place - Meeting the Strategic Leadership Team, other Senior Officers and representatives of the Local Government Association (LGA.)
- Mandatory Committee Training - Licensing and Planning
- Overview and Scrutiny
- Committee specific training such as Audit and Standards, Shareholders
- Compliance
- Social Media
- Treasury Management
- Local Government Finance
- Equality and Diversity

4.7 The Induction programme will be delivered with a mix of in-person training and remote training and delivered by either external training providers, internal officers, or a mix of both.

4.8 Attached at **Appendix A** is the Member Welcome Pack that contains details of the Member Induction Programme. Copies of this document will be provided to Candidates and Agents during the election nomination process. They will then be able to make a note of the dates of the training sessions. Copies of the full document will be provided at the Count on 8 May 2026 to elected Members also.

Reasons for Recommendations

4.9 The recommendations are intended to:

- a) Enable the Committee to consider and approve the Member Induction programme and
- b) provide the Committee with an opportunity to suggest further training requirements that they feel are required.
- c) Enable the Committee to consider the various opportunities available to promote learning and development for Members.

5. Consultation with the public, members, officers and associated stakeholders

5.1. The Committee is being consulted on the initial proposed outline for the Member Development Induction Programme from May 2026.

6. Financial Implications

6.1. There are no immediate financial implications arising from the Member Development Induction Programme at this stage. However, as the Programme is rolled out, costs may be incurred for any sessions that could be delivered by external training providers which will be met from the Member Development budget. The budget for Member Development for 2026/2027 is £2,000.

7. Legal Implications

7.1. The Audit and Standards Committee and the wider Council have a duty to ensure that Members are supported in carrying out their roles effectively. This includes providing training. One of the key roles undertaken by Members is decision making and particularly quasi-judicial decision making where there is a requirement to adhere to specific rules in the way in which decisions are made. Failure to adhere to these rules can jeopardise the decision making of the Council and result in legal challenges. In addition, the Council is under a duty to promote and maintain high standards of conduct which all Members must uphold in performing their duties.

7.2. A structured training and development programme for newly elected Members and continuing training for all Members throughout their term of office will equip them with essential knowledge and skills to perform their roles effectively.

8. Equalities implications

8.1 There are no direct equality implications arising from this report.

9. Health implications

9.1 There are no immediate health implications arising from this report.

10. Climate and environmental implications
- 10.1. No direct climate and/or environmental implications have been identified.
11. Section 17 Crime and Disorder Implications
- 11.1. No direct Section 17 crime and disorder implications have been identified.
12. Risk management implications
- 12.1 There are risks if Members do not receive the training, they need to carry out their roles effectively.
- 12..2 The training for Members of the Planning Application Committee and Licensing Committee is mandatory. Without this training Members would not be able to sit on these Committees or Hearings Panels.
13. Human resources implications
- 13.1. No direct human resource implications have been identified.
14. Options considered and reason for their rejection
- 14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	The Audit and Standards Committee has an obligation to promote and maintain high standards of conduct by Members, Independent Members and any other representatives. Therefore, this report provides details of the Member Induction Programme for 2026/2027. Members need this training in order to carry out their roles effectively

15. Conclusion
- 5.1 The Committee is asked to note and provide comment on the progress undertaken on the Member Induction Programme for 2026 and consider other potential opportunities to deliver and promote learning and development opportunities for Members. The Committee is also asked to note the methods in which the Induction Programme will be disseminated to both Candidates, Agents and newly elected Members.

16. Appendices

16.1. Please note the following appendices:

- i. Appendix A – Member Welcome Pack - May 2026

17. Background papers

17.1 Have Background papers been considered Y/N

17.2 Please note there are no background papers attached to this report.

18. Report Writer Details:

Officer Job Title: Elections and Democratic Services Manager & Deputy Monitoring Officer

Officer Name: Tracy Tiff



New Member Induction Welcome Pack

May 2026 draft version 3
March 2026



Welcome Pack Contents

In this information sheet:

- Welcome to Nuneaton and Bedworth Borough Council
- Member Roles
- Member Induction Programme
- Local Government Association – Member Hub
- Council Constitution and Code of Corporate Governance Summary
- Corporate Plan - Vision and Values
- Organisational Structure

Separate documents enclosed:

- Calendar of Council and Committee meetings
- Member Development Calendar
- Code of Conduct for Members
- Member Allowance Scheme
- Member/Officer Protocol
- IT Acceptable Use Policy
- Gifts and Hospitality Policy
- Safeguarding Policy

Forms to complete and return:

- Payroll Information form (cream sheet, new members only)
- HM Revenue & Customs Starter Checklist (pink sheet, new members only)
- Member Register of Interest (all members)
- Contact details (green sheet, new members only)
- Vehicle Registration form

Please complete these forms as soon as possible and return to:

Democratic Services, The Town Hall, Coton Road, Nuneaton, CV11 5AA

Alternatively, please email them to member.services@nuneatonandbedworth.gov.uk



Welcome to Nuneaton and Bedworth Council

Congratulations on being elected as a Nuneaton and Bedworth Member



We hope that you will have an enjoyable and rewarding experience as a Member and look forward to working with you to achieve our ambition add

In order to help you settle into your role as quickly as possible, this Member Welcome Pack has been written to provide you with all the information that you might need during your initial weeks in office.

It includes key dates, information about the Member Induction Programme, Council meetings and key officer contact details. There are also a number of forms that you need to complete and send back to us asap as part of your induction process.

Our Market Place event on 20 May 2026, ahead of the meeting of Annual Council will be the perfect opportunity for you to meet myself, the Strategic Directors, Assistant Directors and a number of officers and representatives from the LGA the aim of which is to give you a greater insight into the workings of our Council. An Induction event has also been scheduled for 13 May 2pm to 6pm, where you will meet with the Democratic Services Team and ICT officers. Officers will be on hand at the induction to provide you with advice on completing various forms such as your Register of Interest forms; you will be able to hand in all completed forms on 13 May too.

The welcome pack also contains links to further information. If you need any assistance or have any suggestions for improvements to the pack for future years, please contact member.services@nuneatonandbedworth.gov.uk

Tom Shardlow
Chief Executive
Nuneaton and Bedworth Borough Council



Member Roles

Ward Members

All elected members have a responsibility to the residents and businesses in the ward they represent, such as speaking as an

advocate for residents at Planning Committee meetings and working to improve the lives of local individuals and communities. However, ward Members also have a responsibility to the borough of Nuneaton and Bedworth and the Council as a whole, which can sometimes lead to Members needing to balance competing priorities.

The role is varied, with each elected member bringing a different approach and experience to the different demands of each ward.

The Welcome Pack tells you more about the work of the Cabinet and Committees, all of which work in accordance with Council's Constitution - this sets out full details of functions and responsibilities. You can read this at:

<https://www.nuneatonandbedworth.gov.uk/constitution>

The Council

All Members meet together as a Council five or six times a year. Meetings start at 6.00 p.m., and the Council decides overall policies and sets the budget each year. It appoints the Council Leader every 4 years as well as members and chairs of Committees. Council also makes appointments to outside bodies that operate within the Council's area.

The Leader and Cabinet

The Leader of the Council is elected by the Council to serve a four-year term. The Leader is then able to appoint up to five Cabinet Members who take responsibility for areas of the Council's business. There are six Members of Cabinet, including the Leader. The Cabinet meets regularly to take decisions that are not reserved for the Council or committees. Cabinet Members can also make decisions when powers to do so are delegated to them by the Cabinet or Leader.

The current portfolios are:

- Business and Regeneration;



- Housing;
- Resources and Central Services;
- Communities and Public Services;
- Planning and Enforcement; and
- Leisure and Health

Cabinet usually meets at 6.00 p.m. on Wednesdays, roughly on a 4 weekly cycle, and has to make decisions in line with the Council's overall policies and budget (set by the Council). Cabinet members also have legal powers to make decisions (called Single Member Decisions or Individual Cabinet Member Decisions) on matters that are portfolio-specific.

Committee Chairs

The Council has established several Committees who are responsible for taking decisions that the Cabinet cannot take, such as matters relating to planning or licensing. Every Committee has a chair who is responsible for controlling and progressing the business of a meeting.



The chair has considerable control in a meeting and holds a casting vote in the event of a tied vote. Officers may also consult with Committee chairs on business which is relevant to their Committee or on the development agendas for meetings.

Overview and Scrutiny Panels

Currently, there are four Overview and Scrutiny Panels, these are the Business, Planning and Regeneration Overview and Scrutiny Panel, the Housing and Communities Overview and Scrutiny Panel, Environment and Leisure Overview and Scrutiny Panel and the Health and Corporate Resources Overview and Scrutiny Panel. These Panels meet on a Thursday at 6.00 p.m. at least 3 times a year but can meet more frequently. There are 9 Members and usually 1 Co-opted sitting on each Overview and Scrutiny Panel. Overview and Scrutiny Panels can challenge decisions of the Cabinet through a "call-in" process (which requires 3 members to activate it.) They can also help with policy development and monitor performance generally.

Planning Applications Committee

The Planning Applications Committee comprises 11 Members and deals with planning applications and related matters. It generally meets on a Tuesday on a 4 weekly cycle,



starting at 6.00 p.m. although if there are confidential items the meeting will begin at 5:30 p.m. and these will be covered first.

Licensing Committee

The Licensing Committee comprises 11 Members and deals with a variety of licensing and enforcement issues. It generally meets on a Tuesday or Wednesday on roughly a 6 weekly cycle, starting at 6.00 p.m.

Audit & Standards Committee

The Audit & Standards Committee comprises 11 Members plus 1 co-optee and deals with the Council's regulatory framework and maintains an overview of the Council's Constitution, monitoring risk management and corporate governance. It also works to promote and maintain high standards of conduct. It meets approximately 4 times a year on a Tuesday, starting at 6.00 p.m.

Appeals Committee

The Appeals Committee deals with appeals against certain decisions made by the Council. This will apply to decisions where there is no alternative right of appeal (as there is in Planning and Licensing matters) and might encompass, for example, decisions about market traders. The Committee also has a role in hearing appeals against certain employment matters, but this is limited to a review of the process taken to ensure that the published procedures and policies have been followed.

Borough Plan Committee

The Borough Plan Committee is a sub-committee of Cabinet and comprises 9 Members chaired by the Portfolio Holder for Planning and Enforcement. The Committee makes recommendations on local plan proposals as required by law. It meets approximately 4 times a year on a Wednesday, starting at 6.00 p.m.

Shareholder Committee

The Shareholder Committee comprises 6 Members. It encompasses NABCEL (Nuneaton and Bedworth Community Enterprise Limited) which is the Council's private company established to operate in the commercial sector in order to generate additional revenue for the Council. The NABCEL Board comprises of 2 Executive Directors. The Executive Directors are Council Officers. To ensure that the company operates within the law and in accordance with its Governance documents, the Shareholder Committee was established to monitor the company's performance and to approve certain matters reserved to the shareholders. The committee will also monitor Grayson Place (NBBC) Ltd a private company set up by the Council to operate the newly built Hotel by Hilton and any future limited company set up by the Council in accordance with the terms of reference for this committee.



Member Induction Programme

The Member Induction Programme is designed for both returning and newly elected Members. The induction programme is relevant to all Members. It is, therefore, important to provide a programme of training and development that raises awareness and provides vital information to assist you in your role.



The initial Members' induction programme is scheduled over six months. It is envisaged that some sessions may be repeated later in the year. We have taken the decision to hold the Member induction programme as a mix of face-to-face and online training. This is designed to make it easier for you to attend and access the training and information needed to be an effective Member and help balance any other responsibilities you may have. Building on the experiences of the previous Members, the induction reflects their learning and views. This section highlights a summary of each of the planned workshops, events and sessions and provides an overview of what to expect and why attendance is important.

Members worked with Officers to produce the Member Induction Programme. Much of the sessions will be hosted by external training providers or senior Officers of the Council.

Member Induction Event
Wednesday, 13 May 2026, 2pm to 6pm
Council Chamber, Town Hall, Nuneaton

This event will start the Member Induction Programme and you will be able to collect various documents, receive assistance and advice on completing key forms, return forms and discuss with ICT Officers your IT requirements:

- ID badge – Individual Photos will be taken for newly elected Members and used on the ID pass to be available for new Members to collect later on and used on the Council website.
- Tour of Town Hall for newly elected Members:
- Collect keys to Town Hall
- IT equipment – Members to advise of their requirements and arrange collection of required IT equipment. An overview of MS Teams will be provided
- Car Park Passes – Officers will have had to prepare passes for future collection and answer any questions Members may have.



Market Place Event

20 May 2026, 3pm to 5pm
Committee Room A, Town Hall, Nuneaton

As you settle into your new role, we would like to invite you to our Market Place event ahead of the meeting of Annual Council on 20 May 2026, 3pm to 5pm in Committee Room A at the Town Hall. This will be an opportunity for you to meet some of our Chief Executive, Strategic Directors and Assistant Directors, along with the Monitoring Officer and Deputy Monitoring Officer, as well as your fellow Members. You will be provided with an overview of the Council - vision, values, structure and details of the Corporate Plan. The Democratic Services Team will be available to answer any questions you may have.

You will hear from some of our service areas, including those which you will come to liaise with regularly such as Democratic Services. Representatives from the LGA will also be present to advise you of the work of the LGA and the support that can be provided.

Hitting the Ground Running

This event will be held in a location within the West Midlands and when confirmed the date, time and venue will be provided to Members

This session will be delivered by Officers from the Local Government Association (LGA). Issues covered will include:

- What does it mean to be a Member for Nuneaton and Bedworth Borough Council?
- How can I be the best representative for my communities?
- What is the community leader role as a Member?
- What is casework and how do I deal with it?
- What do I do if things go wrong?

Mandatory Planning Committee Training

14 May 2026, 6pm to 8pm
Council Chamber at the Town Hall

or

18 May 2026, 6pm to 8pm
Council Chamber at the Town Hall

Nuneaton and Bedworth Borough Council has one Planning Application Committee that oversee the planning process. This Committee plays an important role in reviewing and making decisions on new development proposals. New developments are required to meet both national and local planning policies.



The training session will provide you with everything you need to know about the planning committees. There are a number of reasons that planning applications get referred to a committee for a decision including a Member request, as mandated by the Constitution, or where the planning officer considers that the committee needs to make the decision.

This development session is for all Members of the Planning Application Committee, and it is necessary for Members to have received this training prior to sitting on the Planning Application Committee, therefore all Members are encouraged to attend as if they will only be able to be a substitute Member if they have received the required training.

The session will be delivered by a representative of the Planning Advisory Service (PAS) together with the Assistant Director for Planning and the Planning Manager.

You only need to attend one of these sessions.

Mandatory Licensing Committee training

Monday, 8 June 2026. 6pm to 8pm – Council Chamber, Town Hall, Nuneaton

Or

Monday, 15 June 2026 5pm to 7pm - *Remotely delivered session*

Two identical sessions will be held, one will be a face to face session and the second session will be remotely delivered over Teams. You only need to attend one session.

These development sessions are for all Members of the Licensing Committee, Members who are not a member of the Licensing Committee are encouraged to attend also. It is necessary for Members to have received this training prior to sitting on any Licensing Committee. There will be an overview of the committee's functions in relation to the Licensing Act 2003 and the regulatory Committee's functions in relation to taxi licensing. The session will provide an overview of the legislation and licensing processes.

It will also provide information regarding some of the issues that may arise during licensing hearings.

The Licensing Committee deals with the council's responsibilities under the Licensing Act 2003 and Gambling Act 2005 (statutory) and any other matters such as taxi licensing, street trading, sex shops (regulatory) that fall within the jurisdiction of the committee. They have the power to appoint sub-committees to discharge duties under the Licensing Act 2003 and the Gambling Act 2005 and any other regulatory matters.

These identical sessions will be delivered by the Licensing Team Leader and the Solicitor – Litigation and Contracts .



Chairing Skills – Good and efficient chairing of meetings
Monday 1 June 2026 6pm to 7pm
Remotely delivered

This training session will be delivered by the LGA.

The session will include:

Hints and tips
Skills and strategies
Running a meeting

All Chairs and Vice Chairs of Committees should attend this session.

Overview and Scrutiny – Effective and Impactful Scrutiny
Wednesday, 3 June 2026 - 6pm to 7pm
Remotely delivered

Overview and scrutiny has statutory powers and requires a unique style and approach for establishing the facts and recommending improvements. This evening session will enable members to explore how to explore policy issues, collect relevant evidence and suggest policy development and areas for policy change.

It will also show how council policies and cabinet decisions are influenced by Members serving on overview and scrutiny committees and their task and finish groups, including the formal and informal powers of holding the executive to public account.

The session will explore how scrutiny can hold to account a range of external organisations and provide Members with opportunities for exploring their policies and activities. It will also examine how scrutiny can be used to influence and shape the activities of bodies beyond the council to bring them, as far as possible, into alignment with the council's own policies.

You will hear about the importance of constructive and effective overview and scrutiny and its role in the good governance of Nuneaton and Bedworth Borough Council. Case studies will help to bring scrutiny to life.

The session is intended for those sitting on Overview and Scrutiny committees; however, it is open to all to attend. It will be delivered remotely by **xxx of the LGA**.

Mandatory Audit and Standards Training
Tuesday 2 June 2026 - 6pm to 8pm
Council Chamber, Town Hall or you can join remotely

This mandatory session is primarily for Members, and the Co Opted Member of the Audit and Standards Committee but it is open to all Members to attend. It is necessary for Members of



the Audit and Standards Committee to have received training before they sit on the Committee.

An effective Audit and Standards Committee is an important part of the Council's governance arrangements, supporting the Council's overall system of governance, risk management and internal control. This training session will provide the baseline to help the Committee fulfil its audit and governance role. The training in respect of Standards will equip you with an understanding of the ethical framework and the importance of adhering to the Code of Conduct and Members have an understanding of the various protocols governing Member and Officer relations. You will also hear about the role and function of the Monitoring Officer.

The session will be delivered by the Assistant Director for Democracy & Governance (Monitoring Officer) together with Officers from Central Midlands Auditors, the Council's Auditors.

Treasury Management
Monday, 29 June 2026 - 6pm to 7:30pm
Remotely delivered

This Treasury Management Training session gives Members the knowledge and confidence to scrutinise investment decisions, borrowing strategies and financial risks effectively.

All Members should attend this session.

The session will be delivered by the Treasury & Technical Business Partner.

Mandatory Shareholder Committee training
Thursday, 2 July 2026 – 5pm to 6pm
Council Chamber, Town Hall

This session will provide Members with an overview of the role and terms of reference of the Shareholder Committee. It is necessary for Members of the Shareholder Committee to have received training before they sit on the Committee.

Therefore, this session has been scheduled ahead of the inaugural meeting of the Shareholder Committee on 2 July at 5pm. It will be delivered by the Strategic Director for Housing & Communities.

Lone Working
Wednesday, 1 July 2026 - 6pm to 7:30pm
Remotely delivered

NBBC recognises that Councillors are required to work by themselves in the community, sometimes in isolated work areas or during out of office hours. This session provide training



to help you recognise and manage risks to your own personal safety that may arise in your activities as an elected member of Nuneaton and Bedworth Borough Council.

The session will be delivered by the Assistant Director for Environment & Enforcement, along with Officers from the Health and Safety Team.

Compliance Training
Tuesday 14 July 2026 - 6pm to 7:30pm
Remotely delivered

This session will provide you with all you need to know about Corporate Governance and Compliance.

All Member should attend this session.

The session will be delivered by the Assistant Director for Democratic & Governance (Monitoring Officer)

Local Government Finance: The Essentials
Thursday 3 September 2026 - 6pm to 7:30pm
Committee Room C, Town Hall

The session will cover an introduction to Local Government Finance and pick out the key figures and issues from the 2026- 2027 budget for Nuneaton and Bedworth Borough Council.

All Members should attend this session.

This session will be delivered by the Assistant Director for Finance.

Personal Safety Briefing –
Wednesday, 30 September 2026, 6pm to 7pm
Remotely delivered

This session is primarily for newly elected Members to NBBC and those that have not previously attended the Personal Security Briefing.

This course has been put together by the LGA. The briefing is designed to provide security/safety advice/cyber awareness for locally elected officials.

The session will be delivered by **xxxxx. Of the LGA.**



Six Month Catch-Up

Monday, 12 October 2026, 5:30pm to 6:30pm

Remotely delivered

This important mid-year session will provide an opportunity for you to review the training you have received so far, recognise what is planned for the remainder of the Municipal year and provide your views on additional training requirements.

Equality and Diversity

Monday, 19 October 2026, 6pm to 7pm

Remotely delivered

This session will focus on:

This session will focus on:

- Definition of Equality and Diversity
- Why does equality matter?
- Who is protected from discrimination (Protected Characteristics)
- Types of discrimination
- What equality isn't and what it should be
- Employee equality commitment
- Council equality information

All Members are encouraged to attend this session which will be held remotely.

This session will be delivered by the Equality and Safeguarding Officer.

Power Hour

Thursday, 19 November 2026, 6pm to 7pm

Remotely delivered

This important Member briefing session will provide you with information around Housing Allocations and Housing repairs, HEART and Council Tax, following which there will be a short Question and Answer session.

The session will be delivered by the Assistant Director for Strategic Housing and the Head of Revenues and Benefits.



Local Government Association (LGA) – Member Hub

The LGA has developed a New Member hub to provide newly elected members with all the essential information they need and complement the induction support councils have in place.



It replaced the annual Members' Guide, and amongst other things, covers: the Member's role; how local government is organised; ; [the model code of conduct](#) and standards; and [decision making](#). It includes information on the offers and services offered by the LGA with links to:

- the [political groups at the LGA](#);
- [regional teams](#);
- information on its [support](#) and development offers; and
- a host of other information essential for newly elected Members.

The Hub is a live and evolving resource which will be updated and provide information and links relevant to new members and can be accessed via [local.gov.uk/our-support/Member-development/new-Member-hub](https://www.local.gov.uk/our-support/Member-development/new-Member-hub)

E-bulletins

Free to subscribe to and available on a wide range of topics.
<https://www.local.gov.uk/about/news/e-bulletins>

LGA Events

The LGA events page provides details of all our upcoming events (in-person and virtual). <https://www.local.gov.uk/events>

Connecting to Wi-Fi

Gov Wi-Fi is a more secure public Wi-Fi system which is designed to be implemented at all Councils. Users can sign up and connect with the same credentials when visiting any participating council building.

Connection requires the user to sign up to create account on a central government manages system which provides a username/password.

When you connect to Gov Wi-Fi you will be prompted for the username and password when trying to connect the first time.

In order to create an account, you need to either:



1. Text "Go" to 07537 417 417
2. Send a blank email from your gov.uk account to signup@wifi.service.gov.uk

You'll then receive a random username and password which is linked to your mobile number/email. You can enter these same credentials on any device that you wish to connect to Gov Wi-Fi.

The username password relates to a person so it should be discouraged for users to connect another user's device with their credentials.

Gov Wi-Fi is currently available in OAS, the Forum and the Guildhall.

When you get a chance, can you please try creating an account and try accessing it? This page has further details on the sign-up process if you need it:

wifi.service.gov.uk/connect-to-govwifi

Committee Timetable

An annual committee timetable is set for all full Council meetings, Committees and Sub-Committees.

The list of committees and information about them is available on the Council's website at [Committee meetings and minutes – Nuneaton and Bedworth Borough Council](#)

Council's Constitution and Code of Corporate Governance

These are key documents, which set out how the Council functions, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and accountable to local people. The Council has a written constitution which sets out how the Council operates, how decisions are made, and the procedures that are followed. Full copies of the Constitution are available online:

[constitution](#)

The Constitution is divided into nine sections which are summarised below:

[Summary and Explanation](#) – A short introduction to the nature and purpose of the Constitution. [Articles](#) – The articles of the Constitution set out a number of rights and powers held by different individuals and bodies, as well as the operation of the Constitution itself.



Responsibility for Functions – The scheme of delegations sets out which committees are responsible for each decision, as well as details of any delegations by committees to officers.

Procedural Rules – in particular, members should make themselves familiar with the Council Procedure Rules which cover their participation in Council and committee meetings.

Codes and Protocols – A number of guidelines covering behaviour in different circumstances exist, including the Member Code of Conduct, and the rules concerning participation in the Planning Committee.

Members' Allowance Scheme – The annually-agreed scheme setting out the basic allowance for Members and any allowances for special responsibilities.

Member-Officer Protocol – A protocol setting out how members and officers should behave towards one another.

Petition Scheme – The scheme sets out rules for the submission of petitions and guidelines on the action to be taken if a certain number of signatures are reached.

Management Structure – A structure showing the departments and responsibilities of senior officers. You can download the current version of the Council's constitution:

Members' Code of Conduct

A copy of the Members' Code of Conduct, which forms part of the Council's Constitution, is enclosed within this pack. It is important that you familiarise yourself with its content as a matter of priority. The Audit and Standards Committee trains and advises on the Code of Conduct, including in relation to parish and town councils.

Protocol on Member/employee relations

A copy of the Protocol on Member/Employee relations, which forms part of the Council's Constitution, is enclosed within this pack. It is important that you familiarise yourself with its content as a matter of priority.

Register of Financial and Other Interests

All Members are required by law to make a written declaration of any 'disclosable pecuniary interests' which they or their spouse have regarding the following topics:

- Employment, office, trade, profession



- Licences
- Sponsorship
- Corporate tenancies
- Contracts
- Securities
- Land

Members are required to register their financial and other interests. A form is enclosed for your use and should be returned to Democratic Services, who retain the register on behalf of the Monitoring Officer. It is important that the form is updated with any changes within 28 days of a change being made. The register is then published on our website and available at One Angel Square, although it is possible to exclude any 'sensitive' interests with the approval of the Monitoring Officer.

Disclosable Pecuniary Interests (DPIs)

When at a meeting Member must make a declaration if any item of business relates to their disclosable pecuniary interests. The Member cannot then take part in that item of business at the meeting.

Other registerable interests

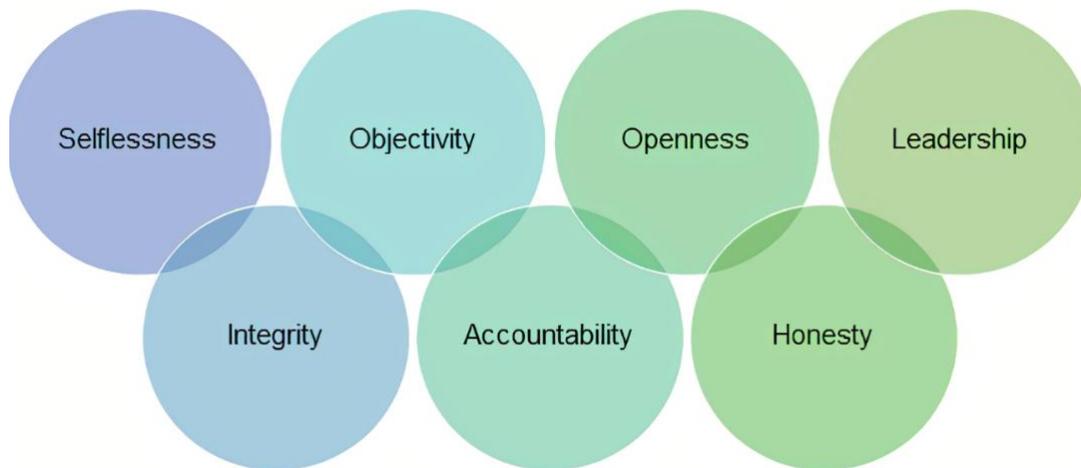
You must declare the interest, where a matter arises at a meeting in which you have an interest, namely:

1. Anybody of which you are in a position of general control or management and to which you are appointed or nominated by the Council;
2. Anybody:
 - exercising functions of a public nature;
 - directed to charitable purposes; or
 - one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management;

In these circumstances, you may speak on the matter only if members of the public are also allowed to speak at the meeting but must not take part in any vote on the matter unless you have been granted a dispensation.



The Nolan Principles



Lord Nolan set out the seven principles of Public Life in 1995 in the first ever report of the Committee on Standards in Public life. The seven principles outline the ethical standards that all working in the public sector are expected to follow.

The principles of public life underpinning the code (based on the Nolan principles):

- Selflessness – acting solely in terms of the public interest.
- Integrity – avoid placing yourself under any obligation to people or organisations that might try inappropriately to influence you in your work.
- Objectivity – taking decisions impartially. It is the role and responsibility of a Member to support all of their constituents equally, this should address not only the need to avoid bias but also the creation of a perception of bias. This should specifically cover the need for heightened awareness and sensitivity on the part of Members who are overtly associated with a particular faith, ethnic or other cultural group.
- Accountability – for your decisions and actions – must submit yourself to the scrutiny necessary to ensure this.
- Openness – transparency, information should not be withheld from the public unless there are clear reasons for doing so.
- Honesty – truthful
- Leadership – Should exhibit these principles in their own behaviour and treat others with respect

The Code of Conduct must include the provision the Council considers appropriate in respect of the registration in its register, and disclosure, of

- (a) pecuniary interests, and



- (b) interests other than pecuniary

Member Allowance Scheme

As part of the Council's Members' Allowances Scheme, all elected Members are paid an annual Basic Allowance. Additional payments called Special Responsibility Allowances are also paid to Members that hold other positions in the Council, such as the Chair of Planning Committee and the Leader of the Council.

Travel and subsistence allowances are payable to Members for attendance at Committee meetings, training, conferences and other meetings that are approved and in accordance with the constitution. A copy of the scheme is attached separately.

Corporate Plan

The Corporate Plan spans from the period 2025 – 2029 and outlines the shared vision for the Borough, specifically:

Place and Prosperity

Enabling local jobs, supporting businesses and regenerating our Town Centres.

Housing, Health and Communities

Promoting healthy lifestyles, supporting vulnerable residents, building new Council homes and strengthening community cohesion.

Green Spaces and Environment

Protecting our natural environment, improving air quality and creating sustainable communities.

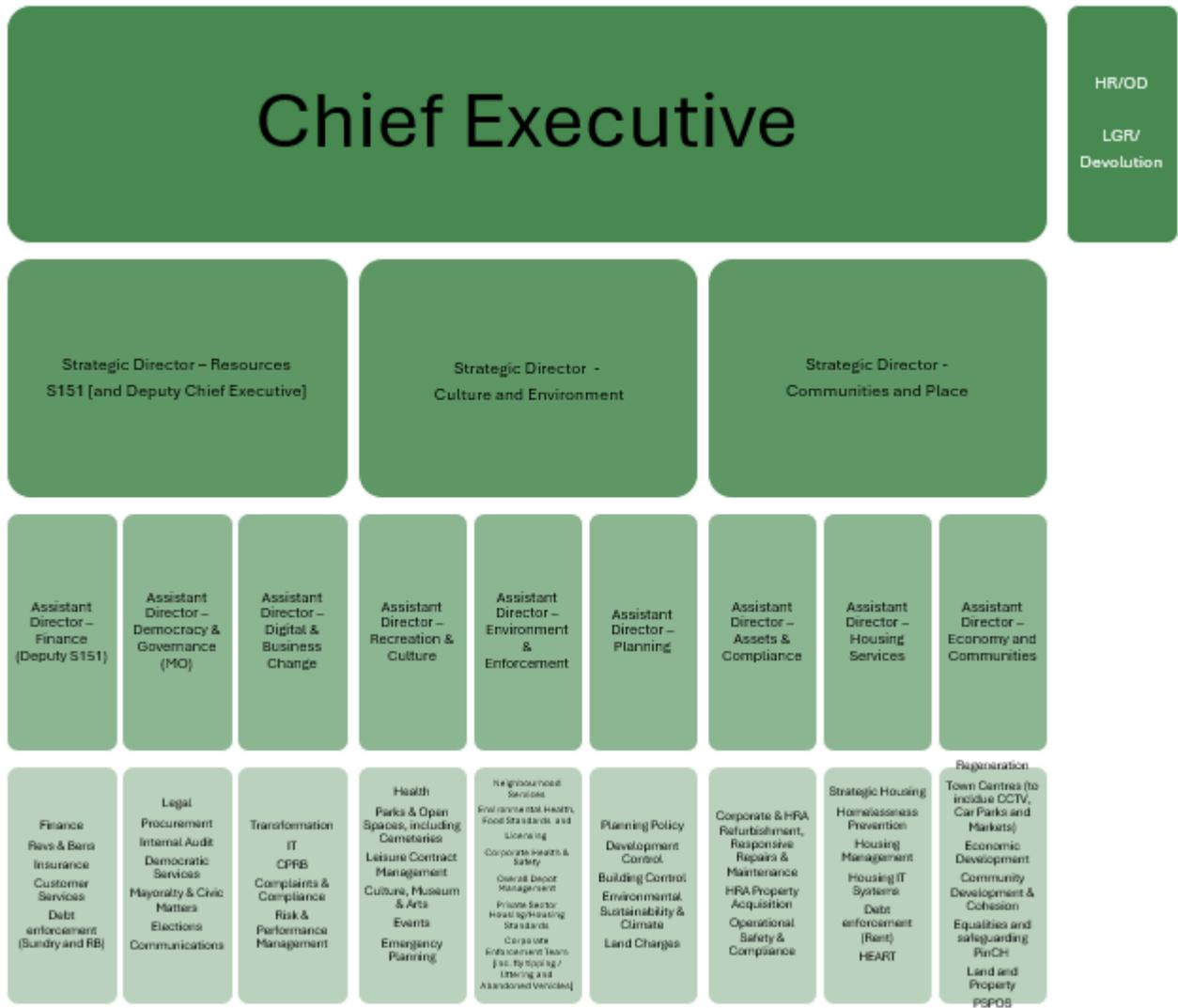
Your Council

Delivering services effectively and efficiently while ensuring value for money for our taxpayers.

[Corporate Plan](#)



Our Organisational Structure



AGENDA ITEM NO. 14

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Audit and Standards Committee
Date of Meeting:	17 th March 2026
Subject:	Overview of Member Complaints
Portfolio:	Not Applicable
Responsible Officer:	Monitoring Officer
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Strive for transparency and accountability, in all that we do. Increase public scrutiny
Ward Relevance:	Not applicable
Public or Private:	Public
Forward Plan:	Not applicable (not for Cabinet)
Subject to Call-in:	Not applicable (not for Cabinet)

1. Purpose of report

- 1.1. To provide the Audit and Standards Committee with an update on the overview report presented in respect of complaints against members. The purpose of the report is not to discuss specific complaints or matters.
- 1.2. Members must note that the Committee should not discuss in open session a specific case. Specific matters are discussed in a sub-assessment committee in line with the process adopted by Council on 18th May 2022 and most subsequently, 2nd July 2025. Therefore, Officers and Members of the Committee must refrain from discussing a specific matter related to an individual further to this

report. This is because under the Local Government Act 1972, paragraph 1 and 2 of Part 1 of Schedule 12A to the Local Government Act 1972 (1. Information relating to any individual. 2. Information which is likely to reveal the identity of an individual.) is classified as exempt information.

- 1.3. The report therefore provides the committee with an overview of complaints to review whether there are any trends or systematic issues with the code of conduct and compliance with the code.

2. Recommendations

- 2.1. It be noted that a total of one (1) formal complaint against elected members has been received since the last report came before the Committee (9th September 2025).

3. Background

- 3.1. As part of the performance management arrangements, reports are submitted to the Audit and Standards Committee every six months. The last report received by Committee at its meeting on 9th September 2025 and before that, 1st April 2025. This report now addresses the complaints received since the last report came before Committee.
- 3.2. Part 5A of the Constitution contains the Member Code of Conduct Complaint Process and part A9.3 outlines the role and function of the Audit and Standards Committee.

4. Body of report and reason for recommendations

- 4.1. The last report issued to the Committee (9th September 2025), confirmed one (1) complaint remained outstanding which was currently being dealt with in line with the process adopted by the Council on 2nd July 2025. This complaint was considered at an assessment committee 25th November 2025. The sub-assessment committee closed the case be resolved by informal action. The Monitoring Officer can confirm the Subject Member issued a letter of apology to the complainants. The Committee will also be aware, as subject to a report at the meeting of this committee 17th March 2026, Chairing Skills - Good and efficient chairing of meetings training is scheduled in the 2026 Member Induction Training programme.

- 4.2. A total of one (1) formal complaint against elected members have been received since the last report came before the Committee (9th September 2025). This remains under review as it was received early March 2026.
5. Consultation with the public, members, officers and associated stakeholders
- 5.1. No consultation has been undertaken directly linked to this report. However, Members of the Committee will note that consultation with a complainant, subject member, the Chair of the Audit and Standards Committee and the committee are consulted on specific matters regarding a complaint.
6. Financial Implications
- 6.1. None directly related to this report.
7. Legal Implications
- 7.1. None directly related to this report.
8. Equalities implications
- 8.1. Not applicable to this report.
9. Health implications
- 9.1. Not applicable to this report.
10. Climate and environmental implications
- 10.1. Not applicable to this report.
11. Section 17 Crime and Disorder Implications
- 11.1. Not applicable to this report.
12. Risk management implications
- 12.1. No direct risk management implications have been identified. However, it is noted that complaints against Elected Members, subject to the complaint, can cause reputational damage to the Council.
13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	The Audit and Standards Committee have an obligation to promote and maintain high standards of conduct by Members, Independent Members and any other representatives. The committee also makes assessments of misconduct allegations where required. Therefore, this 6 month report provides an update to the Committee regarding the member complaint process.

15. Conclusion

15.1. It be noted that:

15.1.1. A total of one (1) formal complaint against elected members have been received since the last report came before the Committee (9th September 2025). This is under review by the Monitoring Officer.

15.1.2. At the time of writing this report and for the purposes of the 2025/2026 Municipal Year, a total of two complaints have been received against elected members under the Member Code of Conduct. Of those, one has been dealt with (informal resolution), and one under review.

16. Appendices

16.1. Please note there are no appendices attached to this report.

17. Background papers

17.1. Please note there are no appendices attached to this report.

18. Report Writer Details:

Officer Job Title: Monitoring Officer

Officer Name: Matthew Wallbank