

Code of Corporate Governance

INTRODUCTION

City of Wolverhampton Council is committed to demonstrating the highest standards of Corporate Governance. Good governance leads to good management, good performance, effective use of resources, good public involvement, and ultimately good outcomes.

The Council's Code of Corporate Governance ("the Code") comprises a range of documents, policies, procedures, cultures, and values and is the system through which the business of the Council is directed and controlled. The Code underpins the aim of achieving good governance.

CORPORATE GOVERNANCE FRAMEWORK

The corporate governance framework of City of Wolverhampton Council is consistent with the principles of the CIPFA/SOLACE best practice framework *Delivering Good Governance in Local Government 2016* (the most up-to-date version). The following **seven core governance principles** ensure that we have high standards of good governance.

- 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 entity's capacity, including the capability of its leadership and the individuals within it.
- F. Managing risks and performance through robust internal control and strong public financial management.
- G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

The table below shows the relationship between each of the seven Principles in achieving the intended outcomes while acting in the public interest at all times.

Underpinning principles	Implementation principles
<i>Principles A and B permeate implementation of all other principles</i>	
A Behaving with integrity , demonstrating strong commitment to ethical values , and respecting the rule of law	G Implementing good practice in transparency, reporting, and audit to deliver effective accountability
	C Defining outcomes in terms of sustainable economic, social, and environmental benefits
B Ensuring openness and comprehensive stakeholder engagement	D Determining the interventions necessary to optimise the achievement of the intended categories
	E Developing the entity's capacity, including the capability of its leadership and the individuals within it
	F Managing risks and performance through robust internal control and strong public financial management
	<i>Improving governance requires a continuing, cyclical, process of evaluation and review. When reaching this point, continue from the top at principle G</i>

MONITORING AND REVIEW

The Council's commitment to good corporate governance includes the application, development, and maintenance of this Code. Each year the Code is reviewed, and an Annual Governance Statement made to accompany the Annual Accounts. The Statement includes an appraisal of the key measures in place to manage the Council's decision making and financial control, and it also provides details of where improvements need to be made. The Statement will be reported to the Governance & Ethics Committee and Audit and Risk Committee (whose respective Terms of Reference can be found [here](#) and [here](#)) who will also monitor progress towards any improvements which need to be made.

The following tables detail how the Council demonstrates its commitment to the seven core principles and indicates where more information can be obtained.

CODE OF GOVERNANCE PRINCIPLE A

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

This core principle is supported by three supporting principles:

- Behaving with integrity
- Demonstrating strong commitment to ethical values
- Respecting the rule of law

What the Council does	How it demonstrates this
Ensures that the Council's leadership set and reinforces the tone of the organisation by creating a climate of openness, support, and respect.	• Protocol for Councillor/Officer relations • Code of Conduct for Councillors • Code of Conduct for Officers • Leadership Forum, Operational Manager Network, Officer Briefings, City People articles, News from the Chief Executive (by email and video) • Weekly Councillor update emails • City Plan • Our People Strategy • HR policy framework including all HR policies • Equality, Diversity, and Inclusion Strategy
Defines the personal behaviours expected of Councillors and Officers.	• Protocol for Councillor/Officer relations • Code of Conduct for Councillors • Detailed training on Code of Conduct • Planning Committee Code of Conduct for Councillors and Employees • Councillors Guide – Equalities • Councillor induction and regular training
Puts in place arrangements to ensure that conflicts of interest are declared and if necessary, the Member/Officer does not participate in decision-making.	• Revised Code of Conduct for Councillors and detailed training • Code of Conduct for Officers • Councillors and Officers Register of Interests • Whistle-blowing Policy & Procedure • Councillor induction and regular training
Develops and maintains shared values including values for both the organization and Officers and communicate these with	• Our City: Our Plan • Council's website • Our People Strategy

Councillors, Officers, the community, and partners.	Engagement with residents and businesses including social media channels
Uses the Council's shared values to act as a guide for decision making and as a basis for developing positive and trusting relationships within the authority.	- Our City: Our Plan - Our People Strategy - Code of Conduct for Councillors - Equality, Diversity and Inclusion Strategy - Code of Conduct for Officers - Professional Conversations
Maintain effective Governance & Ethics Committee.	Governance & Ethics Committee Terms of Reference
Has in place effective systems to enable staff and others to identify any potential wrongdoing and to protect staff should they raise areas of concern.	- Whistleblowing policy - Details of Monitoring Officer on website - Monitoring officer accessible to officers - Safe Space confidential reporting telephone and website for officers
Ensures that professional advice on matters that have legal or financial implications is available in advance of decision making.	- Senior lawyers and senior finance officers review reports going to member decision making meetings and all decisions must have legal and finance team approval before proceeding - Lead Officers for projects have responsibility to engage with legal services and finance to ensure that legal and finance advice is secured for their projects
CODE OF GOVERNANCE PRINCIPLE B Ensuring openness and comprehensive stakeholder engagement This core principle is supported by three supporting principles: - Openness - Engaging comprehensively with institutional stakeholders - Engaging with individual citizens and service users effectively	
What the Council does	How it demonstrates this
Encourages all sections of the community and other stakeholders to participate in our work through public consultation.	- Notices in local newspapers - Press releases for all local media - Promotion and links to consultation via social media channels - Stakeholder engagement channels

	• The Council's website • Consultation Guidance for Employees • Citizen Space consultation and engagement portal
Holds meetings in public unless there is to be discussion of matters of a confidential nature.	• Council, Cabinet, Board, Committee and Scrutiny meetings are all held in public unless considering exempt or confidential information • Protocol for Webcasting of meetings (including arrangements made as per Covid-19 special requirements) • Protocol for Recording and Filming of Meetings and the Use of social media • Clear guidance that meetings must be open unless considering exempt or confidential information
Makes all information publicly available unless it is exempt by law.	• Constitution • The Council's website • Forward Plan of Key Decisions • Webcast of various Meetings (including those made as per Covid-19 special requirements) in accordance with relevant Protocols • Information Governance policies and procedures including relating to Freedom of Information • Environmental Information Regulations procedures • WV Insight data and analytics)
Ensures that clear channels of communication are in place with all sections of the community and other stakeholders and put in place monitoring arrangements to ensure these operate effectively.	• Forward Plan of Key Decisions • Consultation on significant policy changes including via the Council's consultation and engagement portal Citizen Space • Petitions Scheme • Public questions at Health & Wellbeing Together meetings • Information Governance policies and procedures including relating to Freedom of Information • Environmental Information Regulations procedures • Whistleblowing policy • Regular surveys of residents to inform Council documents such as Our City: Our Plan

	• Customer feedback including complaints and compliments
Ensures that Officers are regularly consulted and invite comments from Officers on a wide range of issues.	• Consultation with Recognised Trade Unions • Regular Staff engagement including senior officers attending each Staff Equality Forum and a representative from each Staff Equality Forum attending Strategic Executive Board meetings
CODE OF GOVERNANCE PRINCIPLE C Defining outcomes in terms of sustainable economic, social and environmental benefits This core principle is supported by two supporting principles: • Defining outcomes • Sustainable economic, social and environmental benefits	
What the Council does	How it demonstrates this
Defines and promotes its purpose and vision.	• Our City: Our Plan • Black Country Core Strategy 2011-2026
Maintains up-to-date Purpose and Vision to reflect its financial position and other major policy changes.	• Annual review of Our City: Our Plan
Works with its partners on an agreed common vision.	• Development and implementation of strategies and policies with partners (including but not limited to): • Black Country Local Enterprise Partnership (LEP) • Wolverhampton Health & Well Board (Health & Wellbeing Together) • One Wolverhampton • Wolverhampton Clinical Commissioning Group • Royal Wolverhampton Hospital Trust • Health Watch • West Midlands Combined Authority • University of Wolverhampton • Wolverhampton College • Wolverhampton Homes

Communicates on a regular basis the Council's key performance data, achievements and financial position.	• Annual Report • Finance, performance and risk reports to Cabinet and Scrutiny at least quarterly • A clear performance framework set out in Our City: Our Plan and agreed by Full Council • Annual Audit Letter • Council Tax Information Sheet for residents
Ensures that each service area reviews on a regular basis its objectives and priorities.	• Service Delivery Plans to ensure Our City: Our Plan outcomes are delivered • Performance deep dives at Strategic Executive Board monthly, underpinned by service performance framework • Review of contributions towards the Council's Net Zero Targets
Puts in place effective arrangements to identify and deal with failure in service delivery.	• Complaints routes and procedures (various) including reports to Scrutiny Board • Scrutiny Board and Panels • Internal Audit • Liaison with External Audit • Whistle blowing policy • Monitoring Officer reporting route • Regular performance and budget monitoring reports to Cabinet and Cabinet Resources Panel
Uses national benchmarking of value for money and needs based evidence to regularly review and shape corporate priorities and supporting financial plans effectively.	• CIPFA Financial Management Code • External auditors Annual Report
Addresses the environmental impact of its policies, plans and decisions.	• Environmental implications in all reports
CODE OF GOVERNANCE PRINCIPLE D Determining the interventions necessary to optimize the achievement of the intended outcomes This core principle is supported by three supporting principles: • Determining interventions • Planning interventions	

Optimising achievements of intended outcomes	
What the Council does	How it demonstrates this
Defines and promote its purpose and vision.	Our City: Our Plan
Reviews annually its purpose and vision to reflect its financial position and other major policy changes.	- Annual review of Our City: Our Plan - Medium Term Financial Strategy - Regular finance, performance and risk reports to Cabinet and Scrutiny to inform annual review
Communicates on a regular basis the Council's key performance data, achievements and financial position.	- Annual Reports of Scrutiny Board, Head of Internal Audit, Audit & Risk Committee, Councillor Champions - Regular finance, performance and risk reports to Cabinet and Scrutiny - Updating reports to Cabinet - External Auditors Annual Report - Council Tax leaflets and letters to residents and online information
Ensures risk management process is applied at all levels of the organisation.	- Risk Management Framework - Strategic Risk Register reviewed on a regular basis by the Audit & Risk Committee - Update on Strategic Risk Register to each Audit & Risk Committee - Corporate and Departmental risk registers - Risks considered as part of finance and performance reports to Cabinet and Scrutiny at least quarterly
Ensures that each service area reviews on a regular basis its objectives and priorities.	- Departmental Service Plans/Business plans - Service performance frameworks, with deep dives on performance at Strategic Executive Board on a monthly basis
Puts in place effective arrangements to identify and deal with failure in service delivery.	- Complaints routes and procedures (various) - Overview and Scrutiny Procedure Rules - Whistleblowing Policy - Monitoring Officer reporting route

Ensures resilience with regard to continuity of service in the event of unforeseen events.	Corporate and departmental business continuity and disaster recovery plans and arrangements
CODE OF GOVERNANCE PRINCIPLE E Developing the Council's capacity, including the capability of its leadership and the individuals within it. This core principle is supported by two supporting principles: - Developing the Council's capacity - Developing the capability of the Council's leadership and other individuals	
What the Council does	How it demonstrates this
Sets out in clear terms how the respective roles and responsibilities of the Cabinet and of the Cabinet members are allocated between the Leader, Cabinet and Council Officers.	- Constitution - Protocol for Councillor/Officer relations
Sets out in clear terms the general responsibilities of Councillors and senior Officers and how they perform non-executive functions such as development control.	- Responsibility for Functions (Part 3) and delegation information within or arising from the Constitution - Forward Plan of key Decisions
Sets out how decisions are made, and which decisions are reserved to the Full Council. Determine a scheme of delegation to Chief Officers, including those decisions which are not included in their delegated powers and are reserved to Council or Cabinet	- Scheme of Delegation to Officers (Part 3) within the Constitution - Articles of the Constitution (Part 2) within the Constitution - Forward Plan of Key Decisions
Makes the Chief Executive responsible and accountable for all aspects of operational management.	The Chief Executive is designated Head of Paid Service for the Authority
Makes the Director of Finance (as section 151 officer) responsible for ensuring that appropriate advice is given on all financial matters, for keeping proper financial records and accounts, and for maintaining an effective system of internal financial control.	Section 151 Officer responsibilities (Part 3) within the Constitution

Adopts a protocol for relationships between Councillors and Officers which ensures proper and effective relationships.	• Protocol for Councillor/Officer relations • Staff induction • Code of Conduct for Councillors • Councillor induction and other training • Code of Conduct for Officers • Officer induction documents and sharing of information
Makes the Chief Legal Officer (as Monitoring Officer) responsible for the Council Constitution and for ensuring that agreed procedures are followed and that all applicable statutes and regulations are complied with.	• Monitoring Officer responsibilities specified in the Constitution
Sets out the terms and conditions for the remuneration of Councillors and Officers.	• Constitution • Council's Pay Policy Statement • Councillors Allowances Scheme • HR Policies and compliance with Local Government Terms and Conditions
Ensures that service delivery is effectively monitored.	• Performance framework aligned to Our City: Our Plan, with regular reports to Cabinet and Scrutiny • Service level performance frameworks, with monthly performance deep dives at Strategic Executive Board • Regular reports to Cabinet, Governance & Ethics Committee, Scrutiny board and its six panels
Consults widely on its vision, strategic plans and priorities and take into account the views of the local community and key stakeholders.	• Consultation on Our City: Our Plan, Medium Term Financial Strategy • Consultation on major policy developments via the Council's consultation and engagement portal Citizen Space • Statutory consultations
Ensures that when working in partnership that Councillors are clear about their legal responsibilities and liabilities.	• Advice given to Councillors by Senior Officers
Ensures that where the Council enters into a partnership there is a written agreement between the parties clearly setting out the	• Head of Law to arrange contract preparations

roles and responsibilities, including responsibilities for staffing and funding.	
Provides induction programme for Councillors and Officers.	• Member Handbook • Councillors Development Programme • Councillors Online Learning • Officer induction documents and sharing of information • Councillor Induction training
Ensures statutory officers have the resources and support to effectively perform their roles.	• Section 151 Officer and the Monitoring Officer have a statutory right to be provided with sufficient support and so are able to raise the issue formally if they consider that they do not have adequate resources to enable them to undertake their roles
Assesses the learning and development needs of Officers and Councillors and make a commitment to meet those needs and develop required skills.	• Performance Management and Development arrangements • Professional Conversations • Our People Strategy • Councillors Development arrangements
Identifies leaders of the future.	• Leadership and Management Development including talent management and aspiring managers • Equality, diversity and inclusion initiatives • Deputies for officer roles • Our People Strategy
Provides support for Councillors and Officers who are Directors of Council companies.	• Advice given as required/necessary • Training for Councillors
CODE OF GOVERNANCE PRINCIPLE F Managing risks and performance through robust internal control and strong public financial management This core principle is supported by five supporting principles: • Managing risk • Managing performance • Robust internal control • Managing data • Strong public financial management	

What the Council does	How it demonstrates this
Maintains an effective scrutiny function which is aimed at improvement and service delivery.	• Overview and Scrutiny Arrangements as outlined in Article 7 of the Constitution
Maintains effective arrangements for recording decisions.	• Forward Plan of Key Decisions • Record of Key Decisions • Minutes of all Council meetings • Protocol for Recording and Filming of Meetings and the Use of social media • Protocol for webcasting
Puts in place arrangements to ensure that decisions are not affected by conflict of interest.	• Member and Officer Codes of Conduct • Member and Officers Register of Interests • Support to officers and Councillors who are directors of companies
Maintains an effective Audit Committee that is independent of executive and scrutiny functions.	• Audit & Risk Committee Terms of Reference (Part 8) within the Constitution • Two Independent Councillors appointed to the Audit & Risk Committee
Ensures that an effective and accessible complaints procedure is in place.	• Complaints routes and procedures (various) and guidance on website • Policy on Management of Unreasonable Complainant Behaviour • Whistleblowing Policy • Safe Space confidential reporting telephone line and website
Ensures that those involved in making decisions are provided with all relevant advice and implications.	• Section 151 Officer advice • Monitoring Officer advice • Finance Procedure Rules • Contract Procedures Rules • Senior officers in Legal Services and Finance review all reports going to Councillors for decision • Cabinet Member Briefings • Executive Meetings
Ensures risk management process is applied at all levels of the organization.	• Risk Management Framework • Strategic Risk Register reviewed regularly by Audit & Risk Committee • Corporate and Departmental risk registers • Information Governance Risk Register

	• Performance, finance and risk report to Cabinet and Scrutiny quarterly
Ensures that whistle blowing arrangements are in place for all officers and those contracting with the authority.	• Whistleblowing Policy • Contract Procedure Rules • Standard contracts and involvement of legal team in drafting
Maintains an effective process for reviewing the requirements of the law, the legality of transaction, decisions and the impact of new laws.	• Constitution • Monitoring Officer's responsibilities as per Constitution
CODE OF GOVERNANCE PRINCIPLE G Implementing good practices in transparency, reporting, and audit to deliver effective accountability This core principle is supported by three supporting principles: • Implementing good practice in transparency • Implementing good practices in reporting • Assurance and effective accountability	
What the Council does	How it demonstrates this
Maintains an effective scrutiny function which is aimed at improvement and service delivery.	• Overview and Scrutiny Arrangements as per Article 7 of the Constitution
Maintains an effective Audit Committee that is independent of executive and scrutiny functions.	• Audit and Risk Committee Terms of Reference as per Article 8 of the Constitution • Audit and Risk Committee includes two independent Councillors
Has a robust approach to the provision of Internal and External Audit.	• Internal Audit function with an Internal Audit Charter • Compliance with Public Sector Internal Audit Standards • Internal Audit Annual Report providing an opinion on the adequacy and effectiveness of the Council's internal control, risk management and governance framework • Opt-in to the Public Sector Audit Appointments arrangements for the selection of the External Auditor

	• External Auditor's Annual Report • Internal and external Audit reports considered regularly by Audit and Risk Committee • Audit and Risk Committee Annual Report to Council
Makes all information publicly available unless it is exempt by law.	• Constitution • The Council's website • Forward Plan of Key Decisions • Webcast of various Meetings (including those made as per Covid-19 special requirements) in accordance with relevant Protocols • Information Governance policies and procedures including relating to Freedom of Information • Environmental Information Regulations procedures • WV Insight data and analytics
Ensures that Officers are regularly consulted and invite comments from Officers on a wide range of issues.	• Consultation with Recognised Trade Unions • Professional Conversations
Holds meetings in public unless there is to be discussion of matters of a confidential nature.	• Council, Cabinet, Board, Committee and Scrutiny meetings are all held in public unless considering exempt or confidential information • Protocol for Webcasting of meetings (including arrangements made as per Covid-19 special requirements) • Protocol for Recording and Filming of Meetings and the Use of social media
Ensures that clear channels of communication are in place with all sections of the community and other stakeholders and put in place monitoring arrangements to ensure these operate effectively.	• Forward Plan of Key Decisions • Consultation on significant policy changes including via the Council's consultation and engagement portal Citizen Space • Annual Report • Petitions Scheme • Public questions at Council meetings • Information Governance policies and procedures including relating to Freedom of Information • Environmental Information Regulations procedures • Whistleblowing policy

Communicates on a regular basis the Council's key performance data, achievements and financial position.	• Annual Report • Regular finance, performance and risk reports • Annual Audit Letter • Council Tax Information for residents
Sets out how decisions are made, and which decisions are reserved to the Full Council. Determine a scheme of delegation to Chief Officers, including those decisions which are not included in their delegated powers and are reserved to Council or Cabinet.	• Scheme of Delegation to Officers (Part 3) within the Constitution • Articles of the Constitution (Part 2) within the Constitution • Forward Plan of Key Decisions
Makes the Director of Finance (as Section 151 officer) responsible for ensuring that appropriate advice is given on all financial matters, for keeping proper financial records and accounts, and for maintaining an effective system of internal financial control.	• Section 151 Officer responsibilities as set out in the Constitution