

Local Code of Corporate Governance

2025/26

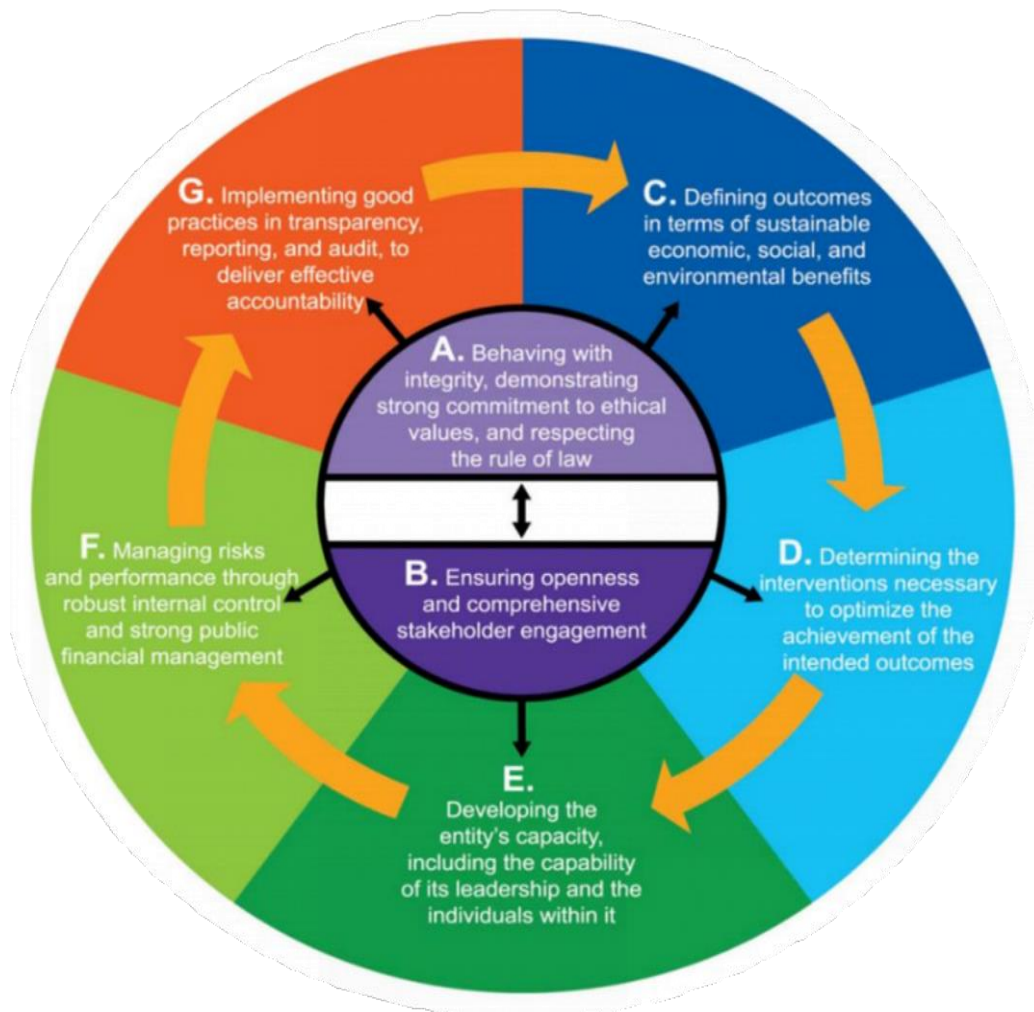


Introduction

Governance in the public sector can be described as the arrangements put in place to ensure that the intended outcomes for stakeholders are achieved while acting in the public interest at all times. In simple terms it is about:

How the Council operates to ensure it is doing the right things in the right way

Our governance arrangements are based on a series of principles*, as shown in the diagram below:



Source: CIPFA / SOLACE framework – Delivering Good Governance in Local Government (2016)

To explain this further:

Achieving the intended outcomes (doing the right thing) requires arrangements for:

- Being clear about what the Council wants to achieve for people, the environment and the economy

- Being clear about the actions needed to achieve the Council's aims
- Making sure the Council has the skills, ability and money to achieve its aims
- Making sure the Council manages risks, budgets and performance
- Making sure that the Council operates in an open, accountable and transparent way

All of the above means the Council needs to have in place ways to ensure the Council is acting in the public interest (doing it the right way). This means the Council needs to:

- Behave with integrity and demonstrate a strong commitment to ethical values and respect the rule of law
- Ensure the Council is open and engaged with our communities and stakeholders

As an example:

The Council's One Coventry Plan is how we define the outcomes we are planning to achieve (Principle C).



Our Local Code of Corporate Governance sets out our arrangements for meeting the principles, helping us to ensure that we deliver our intended outcomes and are accountable to those who live, work and visit Coventry. The law requires us to undertake an annual review to reflect on how well our governance arrangements have been operating in practice during the year and provide an opinion on this.

This is published in our Annual Governance Statement. The Statement also includes a plan of any actions we are taking to improve governance. The Council is committed to continuous improvement and we recognise that good governance is dynamic - as things change, the way in which we work needs to change as well to ensure that we can continue to do the right things in the right way.

The full Local Code of Governance for Coventry City Council is outlined in this document. The Code is reviewed every year and approved by the Audit and Procurement Committee to ensure it is up-to-date and accurately reflects how the Council operates.

Principle A:

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

1. Behaving with integrity

The Council has a Code of Conduct for Elected Members. The aim of the Code of Conduct is to create and maintain public confidence in the role of Elected Members, Co-opted Members and local government. It sets out general principles of behaviour expected of all Elected Members and Co-opted Members. It provides a guide to modelling the behaviour that is expected and covers standards including respect, bullying, harassment and discrimination; confidentiality and use of position as well as arrangements for declaring interests. Members receive training on the Code of Conduct.

There is a Code of Conduct in place for Employees which forms part of their terms and conditions of employment and is based on the Seven Principles of Public Life.

Our 'One Coventry Values' have been co-created with the support and input of all employees across the Council, so they are reflective of how we want to be represented both as colleagues and to our wider

communities. The One Coventry Values are "Open and Fair", "Nurture and Develop", "Engage and Empower", "Create and Innovate", "Own and Be Accountable" and "Value and Respect". Our People Plan sets out our HR ambitions for our workforce over the next three years and has our One Coventry Values at its centre.

2. Demonstrating strong commitment to ethical values

The Council has an Ethics Committee who promote and maintain high standards of conduct by Members and co-opted members. The Ethics Committee monitor the operation of the Code of Conduct for Elected and Co-opted Members, consider complaints made against Elected and Co-opted Members, and monitor the operation of the Code of Conduct for employees.

There is a register of Interests for Members which can be viewed on the website. Officers are expected to declare financial and non-financial interests to their line manager and the Council undertakes an annual declarations of interest exercise in relation to all officers Grade 9 and above.

Gifts and hospitality are declared. The Ethics Committee review Members' and Officers' declarations of gifts and hospitality every 6 months. These are published as part of the Ethics Committee papers.

A Member Officer Protocol offers guidance on some of the issues which are commonly experienced between Members and Officers when working together. Officers and Members both serve the public, but they have different roles. Officers are employees of the Council and are politically neutral.

Their role is to advise Members and implement the policies of the Council to the best of their abilities. Members are office holders and will often belong to a political party. They are obliged to exercise their own judgement in respect of matters before them, but may also legitimately pursue party political objectives. Employees are answerable to the Chief Executive, not to individual Members (whatever office they hold), but there should be good communication between senior officers and Members with special responsibility for their area of work.

3. Respecting the Rule of Law

The Council's Constitution sets out how the Council operates, 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 three statutory posts who are responsible for ensuring the rule of law, as set out in the Constitution is applied – The Chief Executive, Section 151 Officer and the Monitoring Officer. There is a Monitoring Officer Protocol in place.

The Council has a Whistleblowing Policy. This enables employees to report concerns about wrongdoing which are in the public interest. This policy is important as it protects the individual who raised the concerns from suffering any detriment. There is also information on the staff intranet which advises employees how they can raise concerns about work (including Whistleblowing), entitled "I have a concern".

A Group Governance Agreement is in place, which sets out the legal framework for the operation and management of Coventry Municipal Holdings Ltd and its subsidiaries. Coventry Municipal Holdings Ltd and the Council's Joint Venture companies are accountable to the Coventry Shareholder Committee, which represents the interests of the Council as shareholder.

Principle B:

Ensuring openness and comprehensive stakeholder engagement

1. Openness

Formal meetings are open to the public and information is displayed on our website. A weekly public notice is published and displayed at the Council House. Papers are published on the website five working days before a meeting and wherever possible, items are discussed in public. If items are discussed in private, a reason is given for this.

Key Decisions (those which involve financial implications of over £1m or impact substantially on two or more Wards) are published.

Decisions taken by Cabinet and Member Committees are available on the website.

2. Engaging with citizens and stakeholders

The Council is aware that better outcomes and solutions are achieved through strong engagement between organisations, residents and communities. We aim to use different ways of connecting and working with residents to collectively identify priorities and co-produce actions so that better decisions are made.

The Council recognises the importance of partnership working, creating opportunities to solve problems and the importance of inclusive community engagement.

The Council engages with residents and stakeholders in a variety of ways both digitally and non-digitally. We publish a magazine, *Your Coventry*, which is delivered to every house in the city and includes news, views and features about the work of the Council and life in Coventry. The magazine includes information about how you can get in touch with your local councillors and reports on the many events taking place in the city.

The Let's Talk Coventry website is an online engagement platform designed for residents to engage with the Council. You can use it to take part in consultations, share ideas and join in with discussions. We also use the site to keep residents and stakeholders up to date with how your feedback has led to action from the council. All consultations and engagement opportunities are available in hard copies at our libraries. Posters are also displayed giving people a phone number to call to request information in different languages or different formats. Opportunities are also promoted through the many newsletters that are sent out from the Council as well as partner newsletters.

In the case of large-scale projects, leaflets/ “Street News” are produced and delivered to business and residential properties within a geographical location of proposed new developments/transport schemes. One-off public meetings/drop-in sessions are also held.

Peer engagement is recommended working alongside Community Leaders in geographical or special interest groups to encourage involvement. The Council has a network of Community Messengers who share information with community and resident groups, as well as a Faith Compact. This is a joint commitment between faith communities and Coventry City Council to a set of principles that guide engagement, aiming to improve collaborative partnerships, and to promote open, practical working at all levels.

In addition, the Council engages with businesses within the City of Coventry to understand the barriers to entry in tendering for contract opportunities and how these barriers can be addressed through the Council’s Contract Procedure Rules.

Principle C:

Defining outcomes in terms of sustainable economic, social and environmental benefits

1. Defining outcomes

The Council defines its outcomes in the One Coventry Plan – this is our strategic, corporate plan. The One Coventry Plan is focused on the needs and aspirations of our communities. It also contains the One Coventry Performance Framework, which contains the targets we will be working to deliver. Members and senior officers regularly monitor how well the Council is delivering work towards meeting the targets. The Cabinet receives a report reviewing progress biannually toward targets, and an annual performance report reporting progress against performance indicators is published and discussed publicly.

2. Sustainable economic, social and environmental benefits

The One Coventry Plan focuses on economic, social and environmental benefits. The Plan is underpinned by a number of strategies which help us to deliver the plan. This includes the Medium Term Financial Strategy, which helps us to plan our spending over a three-year period, the Climate Change and Sustainability Strategy and the Health and Wellbeing Strategy.

Every decision-making report contains information on how the decision will impact people and the environment. For significant policy changes, full Equality Impact Assessments are undertaken.

The Council has a Social Value and Sustainability Policy. This means that we look at maximising the wider benefit for our city through meeting our needs when we purchase goods, services or works in a way that achieves value for money for the life of the contract. This means that whilst the cost of the contract is important, we also look at what else can be gained, for example, apprenticeship opportunities or environmentally friendly working practices.

The Council has a Supplier Code of Conduct which aims to build trusting and open relationships between the Council and Suppliers to drive improved performance throughout the Council's supply chains. The Code sets out the behaviours that the Council and its Suppliers would expect of each other.

Principle D:

Determining the interventions necessary to optimize the achievement of the intended outcomes

1. Identifying the right course of action

Decision-making reports contain information on the options considered, which includes outlining the impact of doing nothing. Financial and legal implications are explained, and the reports contain information on how the work contributes to the One Coventry Plan as well as how risks are managed. The report also includes information on the impact on equalities, including the identification of any groups that the decision may have an impact on (including a positive impact) and how any potential adverse impacts on groups will be mitigated. The implications of decisions on climate change, the environment and partners are also outlined in decision-making reports.

The Joint Strategic Needs Assessment (JSNA) brings together evidence about the health and well-being of Coventry residents to help inform the right course of action. This information is used by the Council and health partners to enable us to work together to improve the health and well-being of Coventry residents.

There are Procurement Boards and Panels that use the information provided to make informed decisions when we purchase goods and services. This includes considering the Social Value and Sustainability Policy when procuring goods, services or works.

2. Planning action

The Council has a One Coventry Plan Performance Management Framework, which helps us ensure we achieve what we aim to do. It does so by setting out how we plan and organise our resources to achieve the things we want to do – our vision and priorities, as set out in the One Coventry Plan. By aligning our resources, actions and activities to the Council's vision, priorities and desired outcomes, it helps us measure how public money is turned into results. The One Coventry performance monitoring tool identifies areas of focus to ensure resource is appropriately targeted against need.

3. Maximising outcomes

The Medium-Term Financial Strategy (MTFS) sets out how we plan to manage our finances for the next three years and how we can closely align resources to the priorities set in the One

Coventry Plan. This Strategy is refreshed annually and considered by Scrutiny, Cabinet and Council.

Principle E:

Developing the Council's capacity including the capability of its leadership and the individuals within it

1. Developing capacity

Our People Plan outlines what we as a Council and a responsible employer are going to do to deliver the workforce vision and objectives, particularly around organisational design, development and leadership. The People Plan details how we intend to improve capacity, capability and processes to deliver the Council's priorities.

The Council recognises the importance of partnerships in developing capacity in our city. The One Coventry Partnership aims to facilitate and grow cross-organisational working with partner organisations such as the Universities, West Midlands Police and voluntary and community sector partners. The Partnership is chaired by the Director of Care, Health and Housing to improve outcomes through more joined-up and relevant local services.

We are also part of the Coventry and Warwickshire Anchor Alliance, working collaboratively with other organisations to make the biggest positive impact on the lives of local people. Anchor institutions are large organisations based in the city that have a significant stake in the area – this includes NHS Organisations, universities and large employers.

2. Developing strong leaders

The Council has a Members Training and Development Strategy which is designed to ensure our Members are properly supported to help them meet the demands of the role. Members need the skills and knowledge to be able to deliver Coventry's ambitions. A well-trained and informed cohort of Members is key to the success of the One Coventry Plan.

The strategy provides the framework for Members to access a programme of training that meets their needs, as well as the needs of the organisation to deliver the ambition set out in the One Coventry Plan. The strategy will help to continue to support the development of a training culture for Members. Delivery of the strategy is overseen by a Cabinet Member Advisory Panel, which has cross-party representation and makes recommendations to the Cabinet Member responsible for Member training.

The Council has a Corporate Learning and Development offer in place which is centered around embedding diversity, equity and

inclusion and also includes a strand on leadership and management development. Strengthening the leadership and management capability of our workforce will enable us to address some of the challenges we face as an organisation and will put us in a better position to deliver our 'One Coventry' priorities through our One Coventry Plan.

Principle F:

Managing risks and performance through robust internal control and strong public financial management

1. Managing risk

The Risk Management Policy sets out the mechanisms for the identification and management of risks in the Council. This includes requirements for both service and directorate registers to be maintained and when a risk should be reported to the Leadership Team, so that they can consider if it should be included in the Corporate Risk Register. The Corporate Risk Register contains those risks which threaten the achievement of One Coventry priorities, and it is kept under review by the Leadership Team and the Audit and Procurement Committee. In addition, risk registers are maintained for significant projects the Council is working on, and all decision-making reports must explain how risks will be managed.

2. Managing performance

Performance against the One Coventry Performance Management Framework is reported to Scrutiny, Cabinet and Council.

The Council has six scrutiny boards which are responsible for keeping a check on decisions and how they are made. They help to provide transparency and enable decisions and policy to be challenged. Scrutiny plays a part in developing Council policy, reviewing Council Services, and making sure the Council is acting effectively and efficiently. Scrutiny meetings are open to the public and welcome suggestions and comments from the public on items to scrutinise.

Performance management takes place across the organisation. There are a number of Officer groups at which performance is discussed in different levels of details. This includes the Leadership Board.

There is an effective appraisal framework in place for our employees who have an appraisal which considers their performance, targets and development needs every year. As part of the appraisal process, all senior leaders are set a diversity and inclusion objective which is monitored and reviewed on an annual basis.

Performance management of the Council's subsidiaries is undertaken by Coventry Municipal Holdings Ltd who are accountable to a Shareholder Committee.

3. Robust internal control

Officers are responsible for implementing appropriate systems of internal control to manage risks within their services. The Council's Internal Audit Service is responsible for providing independent assurance that internal control processes are operating effectively and advising on actions to improve systems and processes where necessary.

The Internal Audit Charter defines the purpose, authority, responsibility and position of Internal Audit within the Council.

The Council has a Fraud and Corruption Strategy which sets out the Council's arrangements for responding to the risk of fraud and corruption.

The Council has an Audit and Procurement Committee who ensure there is sufficient assurance over governance, risk and internal control and oversees the work of Internal Audit.

4. Managing data

The Council's information governance framework ensures that personal information is held and processed confidentially and securely while ensuring compliance with the relevant statutory and regulatory requirements. Key roles have been identified to ensure appropriate oversight and accountability.

A corporate information risk register has been developed for regular review by the Information Management Strategy Group, which is chaired by the Senior Information Risk Officer.

Guidelines and training are in place to support the safe collection, storage and use of data and a reporting system is in place to identify data incidents, which are investigated and used to identify lessons learned. Information about incidents and near misses are reported annually to the Audit and Procurement Committee.

5. Strong financial management

The Council's Medium Term Financial Strategy sets out the financial planning foundations that support the setting of the Council's revenue and capital budgets and the Constitution sets out the budget and policy framework procedure rules, financial procedure rules, and rules for contracts.

Budgetary control arrangements are in place including defined responsibilities of budget holders and budget managers. Quarterly financial monitoring reports are presented to Cabinet and Audit and Procurement Committee, along with out-turn reports.

An annual assessment is undertaken of both the Council's compliance with the CIPFA Financial Management Code, which provides guidance for effective and sustainable financial management in local authorities and the role of the S151 Officer (Director of Finance and Resources) against the CIPFA Statement of the Role of the Chief Financial Officer in Local Government.

Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability

1. Implementing good practice in transparency

The Council is working towards compliance with the Local Government Transparency Code, which sets out which information we should be publishing and the timeframe for doing so.

Our report templates are standardised and designed to make sure that it is clear why a decision has been taken and that the appropriate information is provided to explain the decision. The reports and minutes of meetings are published and meetings are open to the public.

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2. Implementing good practices in reporting

We report on our performance annually through the One Coventry Performance Report and review every six months with stakeholders to provide assurance of collective progress against targets and identify areas requiring focus. This is available on our website.

We compile our Statement of Accounts on an annual basis. The Statement of Accounts gives residents and other interested parties clear information about the Council's finances and operational and financial performance.

The statement summarises the cost of services provided by us in the year, how services were paid for and our assets and liabilities at the year end. The Statement of Accounts is available on our website. The Council's External Auditors assess the Council's arrangements for providing value for money as part of their audit on the Statement of Accounts.

The Coventry Municipal Holdings Ltd Board provides the Shareholder Committee and Scrutiny Co-ordination Committee with a summary of the activities and financial performance of Coventry Municipal Holdings Ltd Group over the preceding year.

3. Assurance and effective accountability

The Council is subject to a number of external reviews and inspections including OFSTED and CQC, as well as external audit. The outcomes of these inspections and reviews are published. Governance and oversight of these reviews and inspections are undertaken through the local authority.

Services participate in peer reviews which are designed to support the council's performance by identifying its areas of strength and areas for development. Learning from a Local Government Association (LGA) Peer Challenge carried out in January 2024 has been used to develop an action plan for the organisation in response to recommendations for continued improvement. The LGA peer challenge team also revisited the Council in November 2024 to look at progress made against these action plans and to seek assurance that improvements continue to be made.

Improvement plans are developed and monitored to implement recommendations from reviews and inspections, and this is overseen by Cabinet Members in their regular briefings with Directors and by the Leadership Board.

The Council has an Audit and Procurement Committee that ensures that there is sufficient assurance over governance, risk and control within the Council. They also monitor the implementation of internal audit and external audit recommendations.

The Council produces an Annual Governance Statement, which provides accountability to stakeholders on how well it has delivered on governance over the course of the previous year.

