

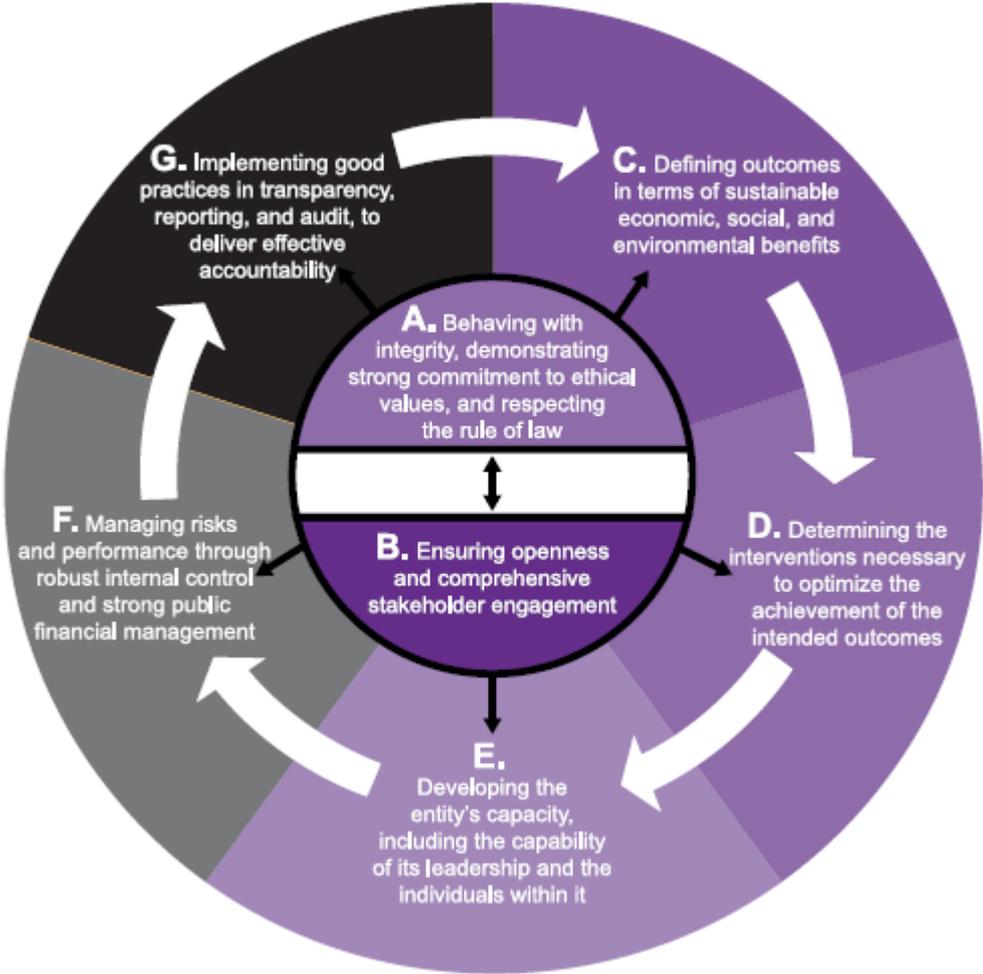
# **SECTION G**

## **MANCHESTER CITY COUNCIL**

### **CODE OF CORPORATE GOVERNANCE**

**Introduction**

The Code of Corporate Governance sets out the Council’s governance standards. These standards ensure the Council is doing the right things, in the right way in a timely, inclusive, open, effective, honest and accountable manner. The Code is based upon the following principles



These principles are taken from the ‘International Framework: Good Governance in the Public Sector’ produced by CIPFA/IFAC<sup>1</sup>. The Framework is based on the principles in the inner circle permeating and being evident throughout the application of the principles in the outer circle. The diagram also illustrates that good governance is dynamic and involves continuous evaluation and review.

The International Framework describes governance as follows:

“Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.”

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<sup>1</sup> CIPFA is the Chartered Institute of Public Finance and Accountancy. IFAC is the International Federation of Accountants.

The Council is committed to ensuring its approach to good governance can easily be understood by all. The Council and the Manchester Youth Council worked together to produce the following summary of the Council's commitment to good governance:

1. **We will** clearly set out our objectives and what we are trying to achieve.
2. **We will** measure how effective our services are and take action to improve them. We will publish information showing how we are progressing towards our objectives.
3. **We will** work with other public services, such as the Police and NHS, to improve services for Manchester residents.
4. **We will** ensure we make the best use of taxpayers' money by taking prudent financial decisions and measuring the level of value for money we achieve.
5. **We will** set out in our Constitution who can take which decisions.
6. **We will** behave in ways that reflect our values and high standards of conduct.
7. **We will** ensure people in the Council making decisions have access to accurate information to help them take decisions in the best interests of Manchester people.
8. **We will** record and publish the decisions we take and the reasons for them. Wherever possible, we will take the most important decisions in public.
9. **We will** carry out scrutiny of our services to make sure they meet our residents' needs.
10. **We will** be sensitive about how we collect and record information about citizens of Manchester and safeguard it from misuse.

### **Principles of Governance in the Greater Manchester Combined Authority**

This Code of Corporate Governance describes the governance standards in place for Manchester City Council. The [Greater Manchester Combined Authority](#) reviews its own Code of Corporate Governance annually. Changes reflect the new governance arrangements needed as it takes on responsibilities for further new functions subsequent to the original Devolution arrangements. The GMCA's most recent powers which relate to the functions of the former Waste Disposal Authority came into force on the 1st April 2018 and follow the mayoral powers of 2017/18. GMCA's Code is published on its website as part of its [Constitution](#).

Manchester City Council, along with the other nine local authority members of the Greater Manchester Combined Authority, has signed an [Operating Agreement](#) with the GMCA setting out their intention to co-operate with each other in the exercise of their functions and in particular their transport, economic development and regeneration functions, and the basis on which this will be done.

# The Council's Corporate Governance Principles

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

### Behaving with Integrity

The Council fosters a culture of behaviour based on shared values, ethical principles and good conduct that is put into practice by members and officers alike.

The Council has adopted a new approach ('Our Manchester') which includes four central principles that underpin everything the Council does, including how it works with partners, how it makes decisions and how it serves local communities;

- **Better lives** – it's about people
- **Listening** – we listen, learn and respond
- **Recognising strengths of individuals and communities** – we start from strengths
- **Working together** – we build relationships and create conversations

The Our Manchester approach puts people at the centre, recognising that people are more important than processes, procedures or organisational boundaries.

The leadership of the Council embodies these values and creates a climate of openness, support and respect that covers the whole organisation. It establishes, monitors and maintains the organisation's ethical standards and performance.

The ['Our People'](#) Strategy articulates what the expectations of the Council's workforce are, in order to make Our Manchester a reality. This identifies four core behaviours which are central to working in an Our Manchester way;

- We work together and trust each other
- We're proud and passionate about Manchester
- We take time to listen and understand
- We 'own it' and we're not afraid to try new things

The Council is committed to maintaining its values and integrity and operates a whistle-blowing policy to ensure that individuals who draw attention to factors that compromise the Council's integrity are adequately protected and supported in doing so.

### Demonstrating Strong Commitment to Ethical Values

The Council operates a voluntary [Standards Committee](#), composed of elected Members and independent co-opted members, with responsibility for promoting and maintaining high standards of conduct by Members, assisting Members to observe the Member Code of Conduct, overseeing the Council's Whistleblowing Policy and monitoring the Member/Officer Protocol.

The leadership of the Council puts in place robust policies and procedures which put its values into practice, these include:

- A [Member Code of Conduct](#) and arrangements for determining allegations that a Member has acted in breach of the Council's Member Code of Conduct, as required by the Localism Act 2011.
- An [Employee Code of Conduct](#) which makes it clear what standards are expected from staff across the organisation in the performance of their duties.
- A Member / Officer Relations Protocols providing guidance on how the working relationships between Members and officers should be conducted.
- Use of Council resources guidance for members which clarifies how Council resources should be used and how to avoid the inappropriate use of resources.
- A [Register of Members' Interests](#), in which Members' disclosable pecuniary interests, personal interests and prejudicial interests (as defined in the Member Code of Conduct) are registered. This includes gifts and hospitality received by elected Members.
- [Registers of Gifts and Hospitality](#) making it clear what gifts and hospitality have been received by officers.
- Registers of interests declared by officers in relation to Council contracts.
- Systems for reporting and dealing with any incidents of wrongdoing including fraud, corruption, bribery and money laundering.

The Council insists its commitment to its values and integrity is shared by external suppliers delivering services on its behalf as stated in its approach to [Ethical Procurement](#) policy.

### **Respecting the Rule of Law**

The Council appoints a Monitoring Officer (the City Solicitor) who is a member of the Strategic Management Team. The Monitoring Officer ensures that decisions are taken in a lawful and fair way and agreed procedures are followed and that all applicable statutes, regulations and procedure rules are complied with.

The Council uses its legal powers, including the '[general power of competence](#)' to promote its values and priorities to the full benefit of the citizens and communities in Manchester. The Council will have full regard to the extent of its powers and not act beyond them, and will observe specific requirements in legislation as well as general responsibilities of public law.

The Council's decision making process will adhere to the principles of good administrative law, respect human rights and demonstrate rationality, legality and natural justice.

The Council puts in place measures to address breaches of its legal and regulatory powers. The Council's Monitoring Officer (the City Solicitor) has statutory reporting duties in respect of unlawful decision making and maladministration. Similarly, the Chief Finance Officer (the City Treasurer) has statutory reporting duties in respect of

unlawful and financially imprudent decision making. These duties are detailed at, respectively, Article 12.3(b) and Article 12.4(a) of the Council's Constitution.

The Council appoints Statutory Officers that have the skills, resources and support necessary to perform effectively in their roles. These statutory officers include:

- Head of the Paid Service (Chief Executive)
- Monitoring Officer (City Solicitor)
- Chief Finance Officer (City Treasurer)
- Director of Children's Services
- Director of Adult Social Services
- Director of Public Health
- Deputy Chief Finance Officer (Deputy City Treasurer)
- Deputy Monitoring Officer (Deputy City Solicitor)
- Scrutiny Officer (Governance and Scrutiny Support Unit Manager)

The Council supports these statutory officers as well as other key post holders and elected members to fulfil their responsibilities within legislative and regulatory requirements.

## **B. Ensuring openness and comprehensive stakeholder engagement**

### **Openness**

The Council sets out in this Code, its Constitution and in its Annual Governance Statement its commitment to openness.

Decisions taken by Council (in this case referring to the meeting of Council attended by all Councillors), as well as those taken by Committees or by the Executive are [recorded](#) (alongside the reasons and the evidence considered) and, subject to limited exemptions, made in public and information relating to those decisions is made available to the public. This includes access through [live webcasts](#) of Council and Committee meetings which remain online for six months.

The Council ensures that its most significant executive decisions (defined as [key decisions](#)) are recorded and, subject to limited exemptions, information relating to the reasons and evidence considered is made available to the public. The Council publishes notification of its intention to take key decisions through [the Register of Key Decisions](#).

The Council holds its Council and Committee meetings, and meetings of the Executive, in public with the agenda and public reports and minutes available on the Council website. However, certain exclusions apply where there is a need to protect confidential information or where certain categories of exempt information are being considered. The Council allows for people to make comments live through social media. Its approach in this area is consistent with the requirements of Part 5A of the Local Government Act 1972 and of the [Local Authorities \(Executive Arrangements\) \(Meetings and Access to Information\) \(England\) Regulations 2012](#).

The Council informs, consults and involves [residents or representatives of residents in significant decisions](#) and their views are submitted to those making decisions for consideration.

### **Engaging Comprehensively with Institutional Stakeholders**

The Council develops and maintains relationships with leaders of other organisations across the private, public and voluntary sector contributing to the vision for the city, including through the [Our Manchester Forum](#). Members of the Forum apply their experience and expertise in key partnerships at either Manchester or Greater Manchester level to benefit the city and actively drive forward the city's priorities as set out in the Our Manchester Strategy.

The Council maintains a [Partnership Governance Framework](#) that defines and standardises its approach to managing its partnerships, in order to help strengthen accountability, manage risk and ensure consistent good practice across its partnerships. This helps ensure the purpose, objectives and intended outcomes for each are clear.

In support of its application of the framework, the Council maintains a [Register of Significant Partnerships](#) listing all the Council's key partnership arrangements and assessing the strength of their governance arrangements. The Council will ensure Members and Officers are clear about their roles and responsibilities, both individually and collectively, in relation to the partnerships they are involved in and to the authority.

### **Engaging with Individual Citizens and Service Users Effectively**

The Council strongly believes that consultation, co-design and co-delivery of services is the best way to deliver services that work for Manchester residents. The Council consults communities, individuals, service users and other stakeholders whenever there is a legal duty to do so, such as in setting the budget, or there is a reasonable expectation that it will, such as where it has consulted on similar matters in the recent past, or where the views of the public and service users will be valuable in informing decisions or the future service delivery model. The Council also talks with residents regularly on a wide variety of issues and topics.

As part of its Our Manchester approach the Council focuses on 'strengths based' conversations with residents and communities, to draw out and start from what the positive assets of people and places are. This could be said to be using the principle of a conversation that is centred on "what's strong" rather than "what's wrong".

The Council informs, consults and involves residents of Manchester on issues of interest to them, including through the [Council's online consultation portal](#), and maintaining effective channels for dialogue and debate, including live streaming of Council and Committee meetings and a wide mix of social media. This includes Facebook, Twitter, Vimeo, Youtube, Instagram and LinkedIn.

When conducting consultations the Council strives to balance the feedback it receives from more active stakeholders with that from less active stakeholders through monitoring responses by age, gender, location, ethnicity, sexuality and other factors and delivering targeted promotion where required to ensure that the sample of respondents is representative of the city as a whole.

The Council adopts a "You Said ... We Did" approach to consultation and promotes material advising the public and other stakeholders of the key findings from consultations and how they have been taken into account.

The Council has an online survey for Manchester residents so that it can access an up-to-date summary of the views of citizens on the city, their neighbourhood and the delivery of public services.

The Council is committed to considering and acting upon feedback from citizens and service users and so maintains effective [complaints and compliments handling](#) and monitoring procedures so that it can identify where improvements in service delivery are needed and learn effectively from the complaints it has received.

The Council takes account of the impact of decisions on future generations of tax payers and service users, its commitment to doing so is matched by the commitment

of the members of its Youth Council, which acts to ensure young people have a stronger voice enabling them to make their views heard and to be involved in decision making in the city. The Council also uses relevant communication channels that younger people are more likely to engage with.

The Council is committed to the Age-Friendly Manchester partnership, involving organisations, groups and individuals and which has helped to create a city that's recognised by the World Health Organization as a great city to grow older in. The Age-Friendly Manchester Older People's Board includes and represents older people, addressing issues affecting the quality of life for older residents and their communities across Manchester. The Council works jointly with older people and health services to develop age-friendly neighbourhoods.

The Council as an organisation, and the elected Members that make it up, share a common understanding of their respective roles regarding community engagement and work together to ensure the organisation understands and can effectively respond to local issues and concerns, through mechanisms such as ward co-ordination.

## **C. Defining outcomes in terms of sustainable economic, social, and environmental benefits**

### **Defining Outcomes**

The [Our Manchester Forum](#), following an extensive public consultation in 2015, developed a 10 year strategy for the city – the [Our Manchester Strategy](#) as well as a new approach to delivering functions – the Our Manchester approach. The Our Manchester Strategy sets out a vision of Manchester as:

- A Thriving and Sustainable City
- A Highly Skilled City
- A Progressive and Equitable City
- A Liveable and Low Carbon City
- A Connected City

Progress towards the vision described in the strategy is being monitored through the Forum's annual [State of the City](#) publication which comprises and analyses key performance indicators.

The Our Manchester Strategy sits at the heart of the Council's [budget and business planning process](#). Through this process the Council allocates resources to progress towards the vision for the city in the most effective and efficient way. The Council sets a [Medium-Term Financial Strategy](#) which sets out the financial assumptions and provides a set of goals for financial decision making for the planning period ahead. The Council is committed to consulting the people of Manchester and local businesses in the design of its budget proposals to understand service user's expectations and to inform service users of financial limitations.

It also sets objectives for each directorate as well as the performance monitoring framework that will be followed to track progress towards these objectives from the perspectives of finance, performance, workforce development, equality and risk.

The Council is committed to regularly reviewing its reporting methods, to ensure that they remain as efficient and effective as possible. New, more concise and timely integrated reporting compiles workforce, performance, and budget monitoring, leading to a single view of success and challenges based on multiple information sources. The development of this reporting has supported leaders in the organisation to respond rapidly to dips in performance or budget pressures. This new method at the heart of the Council's management systems has helped to strengthen governance of service delivery.

The city's role in delivering Our Manchester will provide a key element of support for the linked objectives of the Greater Manchester Combined Authority (GMCA), as set out in the Strategy launched in October 2017; ["The Greater Manchester Strategy – Our People, Our Place"](#).

### **Sustainable Economic, Social and Environmental Benefits**

The Council is committed to considering the full combined economic, social and environmental implications of its decisions through thorough data analysis and

consultation with affected parties so that its decisions advance the achievement of the city's vision. The Our Manchester Strategy is an integral part of the Council's decision making process. The Council will set out in reports recommending a decision, the impact the decision will have on the five broad objectives in the Our Manchester Strategy.

The Council's budget and business planning process involves equality action planning. Under this process the Council sets out how it will work towards its agreed [Equality Objectives](#) and where Equality Impact Assessments are required to assess the impact of proposals which may have an impact on different communities of interest across the City. The Council strives to ensure fair access to services, which services monitor individually, and the extent to which this is occurring corporately is shown through the biennial '[Communities of Interest](#)' publication (future publications will be called 'Communities of Identity').

The Council is committed to working with partners to play its part in delivery of the pledge in the Our Manchester Strategy that *'Manchester will play its full part in limiting the impacts of climate change and by 2025 will be on a path to being a zero carbon city by 2050'*.

The Council works to deliver 'Inclusive Growth', i.e. growth which is of benefit to all the people who live in the city. Programmes are explicitly designed in ways which seek to ensure that local people benefit from the wider growth in the city's economy.

The Council acknowledges that alongside the strengths and assets of the city and its residents, challenges such as poverty, deprivation, low skills and unemployment still exist, and can be concentrated in certain areas in the city. By a combination of co-design of strategy with input from partners and residents, backed by evidence based on research and intelligence, it endeavours to enact policy which will lead to progress towards the aim of a becoming a more progressive and equitable city.

## **D. Determining the interventions necessary to optimise the achievement of the intended outcomes**

### **Determining Interventions**

Decision makers receive accurate, relevant and timely performance information and intelligence to support them with objective and rigorous analysis of options, covering intended outcomes, financial impact and associated risks informing efficient service delivery.

The Council is committed to seeking continuous feedback from citizens and service users both in planning service changes and improvements whether through its online resident's survey, consultation or bespoke feedback gathering.

Delegation of decision making to officers is detailed in the Constitution so that they can deal with the day-to-day running of services without the need to constantly refer matters back to Elected Members. Details of what decisions are taken in this way are included in the Scheme of Delegation in the council's Constitution. Further specific delegations may be granted through recommendation in public reports to Committees.

### **Planning Interventions**

The Council plans its activity at a strategic level through its budget and business planning cycle and does so in consultation with internal and external stakeholders to ensure services delivered across different parts of the organisations and partners complement each other and avoid duplication.

This is facilitated through the Manchester Partnership which comprises Thematic Partnerships supporting delivery agencies across the city to co-ordinate their activity and consider how they can collaborate to reduce risks to achieving their outcomes. The Thematic Partnerships include:

- [Children's Board](#)
- [Community Safety Partnership Performance Board](#)
- [The Health and Wellbeing Board](#)
- [The Neighbourhoods Board](#)
- [Work and Skills Board](#).

The effectiveness of the Council's interventions and the quality of its services is monitored through the provision of regular performance reports showing progress towards goals and targets set in the budget and business plan.

### **Optimising Achievement of Intended Outcomes**

The Council is committed to integrating and balancing service priorities, affordability and other resource constraints supporting it to take into account the full cost of operations over the medium and longer term. This is documented in the [Medium Term Financial Strategy](#) which sets the context for the Council on significant ongoing financial challenges as well as external changes, such as changes to local

government funding arrangements that are planned or forecast to arise during the planning period. The context and documents which support the overall strategy are set out in the [Efficiency Plan](#), published on the Council's website as required by Government for a four year financial settlement.

Our Manchester requires an integrated approach to the deployment of revenue and capital spend against a clear set of priorities. Therefore the Council's five-year [Capital Strategy](#) forms a critical part of strategic and financial planning.

The Council procures goods and services in compliance with EU, UK and Council regulations and ensure that value for money is obtained through a balanced consideration of social, economic and environmental impacts that can be derived from procurement spend.

The Council considers [Social Value](#) at pre tender and tender stage to ensure that appropriate desirable outcomes can be offered by suppliers in their tender submissions. Through this process the Council considers how what is proposed to be procured might improve the economic, social and environmental well-being of the relevant area, and how, in conducting the process of procurement, it might act with a view to securing that improvement.

## **E. Developing the entity's capacity, including the capability of its leadership and the individuals within it**

### **Developing the Organisation's Capacity**

The Council monitors on an ongoing basis its governance and staffing structures to support the delivery of planned services and proactively plans for the future. Through its budget process, the Council ensures services are prioritised so that resources are directed to those activities that will make the greatest contribution to the city's vision.

The Council continually seeks better outcomes from its use of resources by comparing information about functions, expenditure and performance with those of similar organisations and assesses why levels of economy, efficiency and effectiveness are different elsewhere. It acts upon the findings of this intelligence as part of its budget and business planning to ensure continual effectiveness of service delivery.

Where intelligence suggests alternative delivery methods, such as the establishments of partnerships or other types of collaborative working with other organisations, will lead to improved value for money these are explored.

In line with its Our People Strategy, the Council develops and delivers workforce plans which set out actions to ensure the workforce has the necessary skills and behaviours to deliver the vision for the city and are effectively engaged to act as champions for the Council's priorities and approaches.

### **Developing the Capability of the Organisation's Leadership and Other Individuals**

The Council Leader and Chief Executive have clearly defined roles and maintain a shared understanding of roles and objectives. The Chief Executive leads in implementing strategy and managing service delivery and other outputs set by members. The Chief Executive and Leader provide a check and balance for each other's authority.

The Council is committed to operating in an efficient and effective way to obtain value for money from its resources. It maintains a [Scheme of Delegation](#) setting out which decisions and powers have been delegated to various Committee and other officers.

So that Elected Members and Senior Officers have a shared understanding of their respective roles the Council has produced [a Protocol governing Member/Officer relations](#).

As part of the Our People strategy, improved staff induction and appraisal processes ("About You") are in place. These ensure all staff understand the part they will play in delivering the vision for the city in Our Manchester. A 'Golden Thread' links individual staff objectives to team plans, directorate budget and business plans and the strategy for the city. As part of the 'About You' process staff consider with their line manager what training, development and support they need to succeed in their role.

The Council believes that governance is strengthened by the participation of people with many different types of knowledge and experience. Where external recruitment takes place, individuals from a range of backgrounds and communities are made aware of opportunities to join the Council. The Council is also committed to promoting electoral registration and participation and confidence in the integrity of the electoral process.

The Council is committed to developing the capability of people with governance responsibilities, evaluating their performance and ensuring that all staff understand the importance of governance within their role. As part of this, the Council provides an effective induction and training programme for Members and Officers tailored to individual needs and provides regular opportunities for them to learn about new developments key to their role as well as effective training and guidance for Members and Officers to understand their governance responsibilities. The corporate induction approach is currently being reviewed to further strengthen this area.

The Council is committed to developing all its managers at all stages throughout their careers. Therefore it offers a broad range of courses ranging from those aimed at all new managers, existing managers, and leaders.

The Council is consistent on consulting staff and their representatives on decisions regarding the terms and conditions of employment and the policies staff are subject to.

The Council listens to the views of its staff via the “BHeard” survey, and uses learning from this to make improvements in the way that it operates and communicates. It clearly communicates to its workforce when changes are made resulting from feedback in the survey, using a “You said... we did” approach.

The Council’s Senior Officers and Executive Members run regular “Listening in Action” events where staff have the opportunity to engage with the Council’s senior leadership in question and answer sessions.

The Council is committed to promoting the physical and mental health and wellbeing of the workforce as a core component of the People Strategy through both specific interventions and opportunities and as a central part of the role of all managers. This work is overseen by a cross-Directorate board which also includes representatives from Trade Unions. There is a dedicated intranet page with a wide range of support and guidance for staff and their managers covering a wide range of health and wellbeing topics and a 24/7 Employee Assistance Programme phone line providing a range of support.

The Council has an open and welcoming approach to external and peer review and inspection and actively considers constructive feedback.

## **F. Managing risks and performance through robust internal control and strong public financial management**

### **Managing Risk**

The Council operates a risk management framework that aids decision making in pursuit of the organisation's strategic objectives, protects the Council's reputation and other assets and is compliant with statutory and regulatory obligations. The framework is documented in a [Risk and Resilience Strategy](#) which is submitted to the Council's Audit Committee; the strategy involves regular appraisal of the effectiveness of risk management arrangements, involving elected members in the process of doing so. The implementation of the strategy is supported through a programme of risk management training for officers and members. The Council maintains a Corporate Risk Register identifying named risk managers for its key strategic risks.

Risk management is also an integral component of the budget and business planning process, linking risk management to the achievement, monitoring and resourcing of objectives at directorate level.

### **Managing Performance**

The Council puts in place measures to monitor service delivery whether services are delivered internally or through external providers. Key Performance Indicators (KPIs) setting out the effectiveness of services are monitored by service managers to inform and support accountability for delivery. Reports compiling KPIs are submitted to directorate management teams to support transparency and resource allocation to address challenges.

Performance management remains relevant to the organisation through the business planning process where directorate objectives are reviewed, leading to a review of the relevant performance indicators to monitor progress towards them.

Performance of services delivered through external companies is monitored with those providers so that a shared understanding of contract performance is achieved. Similarly the Council monitors performance towards objectives set at a partnership level with key partners providing appropriate support to enable any barriers to continuous performance improvement to be addressed.

Relevant, objective and reliable performance information is used to inform decision making, alongside financial implications and risk information. The Council seeks to continue to innovate with its reporting methods, to ensure that its senior leaders have access to the most concise and timely information, providing a single view of organisational successes and challenges. This supports effective evidence based decision making.

### **Effective Overview and Scrutiny**

The Council believes that effective overview and scrutiny of decisions and delivery of services leads to improved decision making and improved public services. The

Council establishes and maintains an effective [Scrutiny function](#) which is able to constructively challenge decision-makers, including those who work in partnership with the Council, and policy makers.

This scrutiny applies equally to the setting of policy, objectives and budgets as it does to the delivery of services and arrangements for monitoring them.

### **Robust Internal Control**

Internal Control within the Council supports the achievement of objectives by managing risks while complying with regulations and organisational policies. Internal controls seek to protect the Council's resources against loss, fraud, misuse and damage and to safeguard the availability, confidentiality and integrity of its ICT and information systems.

The Council maintains clear policies and arrangements in respect of counter fraud and anti-corruption. These are the Anti Fraud and Anti Corruption Policy; Whistleblowing Policy; Anti Money Laundering Policy and the Anti Bribery Policy.

The Council ensures an independent [Audit Committee](#) is in place which provides a mechanism for effective assurance regarding risk management and the internal control environment.

The Council's internal auditor assesses the overall adequacy and effectiveness of the framework of governance, risk management and control. A summary of the findings is documented in the "Head of Internal Audit Annual Opinion" section of the [Annual Governance Statement](#).

### **Managing Data**

The processing of personal data is essential to many of the services and functions carried out by local authorities. The Council complies with data protection legislation which includes GDPR (General Data Protection Regulation) and the [Data Protection Act 2018 \(DPA 2018\)](#), this will ensure that such processing is carried out fairly, lawfully and transparently.

The Council will review and supplement its policies and also keep its processing activities under review, to ensure they remain consistent with the law, and any compliance advice and codes of practice issued from time to time by the Information Commissioner's Office (ICO).

The Council is committed to safeguarding the personal data it holds and sharing this data only in circumstances required or permitted by law.

The Council will ensure that officers handling personal data will be trained to an appropriate level in the use and control of personal data. It is made clear that all staff and Members are personally accountable for using the Council's information responsibly and appropriately.

The Council will ensure that all staff handling personal data know when and how to report any actual or suspected data breach, and that Members are made aware of the appropriate procedures. We will appropriately train staff to manage any breach correctly, lawfully and in a timely manner. Breaches will be reported to the ICO where such reporting is mandatory or otherwise appropriate and shall be done within the required timescales.

All resources which staff use to support their understanding of the regulations are set out in plain and clear language, and are easily accessible from one place on the Council's intranet. These resources include information on the 12 Golden Rules, Roles and Responsibilities, Training, and Incidents and Reporting. To supplement and re-inforce the message from information accessible on the intranet, communications and reminders to staff include email broadcasts, posters, and leaflets about the 12 Golden Rules.

Information Governance is overseen by the Corporate Information Assurance and Risk Group (CIARG) chaired by the City Solicitor who is the Senior Information Risk Owner for the Council (SIRO). The work of the SIRO will be supported at Directorate level by Directorate SIROs ("DSIROs"), who may in turn appoint deputies.

The Council also appoints a Data Protection Officer ('DPO'). The DPO's responsibilities include:

- Informing and advising the Council and its staff about their obligations to comply with data protection legislation.
- Monitoring compliance with data protection legislation, including managing internal data protection activities, advising on data protection impact assessments, training staff and conducting internal audits.
- Co-operating with and acting as the first point of contact for the ICO.

The Council will ensure that:

- The DPO reports to the highest management level of the Council in respect of their duties as DPO.
- The DPO operates independently and is not dismissed or penalised for performing their task.

The Council is committed to sharing appropriate data safely with other agencies; where this improves effective and efficient service delivery, supports its objectives and the vision for the city and is compatible with the rights of individuals.

The Council complies with the [Local Government Transparency Code 2015](#) by publishing accurate data within appropriate time frames in the areas mandated by the Code in the Council's [Open Data Catalogue](#) together with additional data of value to stakeholders and the public.

The Council keeps under regular review the quality and accuracy of the data it produces, and uses in decision making and performance monitoring.

The Council makes information available to the public via the information access regimes provided for by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004.

Data protection legislation provides individuals with various rights. An individual's rights include, but are not limited to; 'the right to be informed', 'the right of access' and 'the right of rectification'. The Council recognises the fundamental nature of the individual rights provided by data protection legislation. The Council will ensure that all valid requests from individuals to exercise those rights are dealt with as quickly as possible and by no later than the timescales allowed in the legislation.

### **Strong Public Financial Management**

The Council's approach to Financial Management ensures that public money is safeguarded at all times ensuring value for money. Its approach supports both long term achievement of objectives and shorter term financial and operational performance.

The Chief Finance Officer, the City Treasurer, ensures that appropriate advice is given on all financial matters, proper financial records and accounts are kept, and oversees an effective system of internal financial control. The City Treasurer ensures well developed financial management is integrated at all levels of planning and control including management of financial risks and controls.

## **G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability**

### **Implementing Good Practice in Transparency**

The Council is committed to publishing information including reports in a manner which is accessible to citizens and other stakeholders. Information is produced in an open and understandable style appropriate to the intended audience and the communication channel, including web-based and social media. The publication of information will strike a balance between satisfying transparency demand and becoming too onerous for users to understand.

The Council maintains a coherent and consistent approach to the management of social media, both with regards to messages sent out from the Council as well as those sent by individual staff members and elected Members, to reduce the risks of any breaches of legislation or reputational damage.

### **Implementing Good Practices in Reporting**

The Council seeks to demonstrate to its stakeholders that it has delivered on its commitments and goals and has used public resources effectively in so doing. To this end it publishes an [Annual Report](#) as part of its accounts, setting out how it has performed, delivered value for money and exercised sound stewardship of resources.

The Annual Report includes performance information accompanying the financial statements that allow for comparison with other similar local authorities to be made. This information is drawn from the Council's Annual [State of the City](#) publication which charts the city's progress towards its vision.

The Council has a legal responsibility to conduct, at least annually, a review of the effectiveness of its governance framework including its system of internal control and document the findings in an [Annual Governance Statement](#). This evidences how it has complied with CIPFA's "Delivering Good Governance in Local Government (2016)", and includes an action plan identifying what governance challenges it will need to address in the next financial year. The Council also summarises the findings from the review in an easily digestible format within the Annual Report.

### **Assurance and Effective Accountability**

The Council welcomes peer challenge, internal and external review and audit, and inspections from regulatory bodies and gives thorough consideration to arising recommendations. It puts in place arrangements for the implementation of actions agreed to be taken as a result and there is clear oversight from elected members on the conclusions and resultant actions.

The Council monitors the implementation of internal and external audit recommendations. Assurance reports are presented to Audit Committee and its External Auditors bi-annually summarising the Council's performance in implementing recommendations effectively and within agreed timescales.

The Annual Governance Statement contains a section “Annual Review of the System of Internal Audit” which sets out how the Council has gained assurance regarding the effectiveness of its Internal Audit function.

Public Sector Internal Audit Standards (PSIAS) set out the standards for internal audit and have been adopted by the Council. This process includes the development of an Emergent Audit Plan designed to invite comment from management and the Audit Committee.

## Monitoring and Review

This Code will be reviewed on an annual basis to ensure it is kept up to date. Where the review identifies that changes to the Code are necessary, the revised Code will be submitted to Standards and Audit Committee for comments before being incorporated within the Council's Constitution.

The Council has three Committees that are jointly responsible for monitoring and reviewing the Council's Corporate Governance arrangements. These Committees are:

- [Audit Committee](#) - responsible for approving the Council's annual accounts and responding to the External Auditor's Annual Audit Letter. It also oversees the effectiveness of the Council's governance and risk management arrangements, the internal control environment and associated anti-fraud and anti-corruption arrangements.
- [Resources and Governance Scrutiny Committee](#) – reviews how the Council uses its resources effectively and efficiently to deliver services for Manchester residents. It also looks at governance arrangements of the Council and its partners in the public sector, to ensure the views of local residents and their representatives are reflected in decisions it takes.
- [Standards Committee](#) – responsible for promoting and maintaining high standards of conduct amongst Members, for advising the Council on the adoption and revision of the Code of Conduct for Members, for monitoring the operation of the Code and oversight of the Whistleblowing Policy (with changes approved by Audit Committee).

Full terms of reference for each of these Committees are included in the Council's [Constitution](#). All Members of the Council are informed of the work of these Committees through minutes submitted to Council.

The Council will ensure that corporate governance arrangements are kept under continual review by updating, as appropriate, these Committees on:

- The work of Internal and External Audit
- The opinion of other review agencies and inspectorates
- Opinions from the Council's Statutory Officers
- General matters relating to the implementation of the Code
- The production of the Annual Governance Statement and actions planned to address arising governance issues.

## The Annual Governance Statement

Each year the Council will publish an [Annual Governance Statement](#) to accompany the [Annual Accounts](#). The Statement provides an overall assessment of the Council's corporate governance arrangements and how it adheres to the governance standards set out in this Code. Evidence relating to the principles of this Code is reviewed and analysed to assess the robustness of the Council's governance arrangements.

The Statement includes an appraisal of the key controls in place to manage the Council's principal governance risks and the effectiveness of systems and processes governing decision making and financial control. The Statement also provides details of

where improvements need to be made. Actions to address significant governance issues are identified and recorded in an action plan. The Annual Governance Statement is audited by the Council's external auditors as part of the audit of the annual accounts.