

Cotswold District Council

Local Code of Corporate Governance Reviewed December 2024 September 2025

1. Delivering Good Governance

- 1.1 The Delivering Good Governance in Local Government; Framework, published by CIPFA in association with SOLACE, sets the standard for local authority governance in the UK. The concept underpinning the framework is to support local government in taking responsibility for developing and shaping an informed approach to governance, aimed at achieving the highest standards in a measured and proportionate way. The purpose of the Framework is to assist authorities individually in reviewing and accounting for their own unique approach, with the overall aim to ensure that:
 - Resources are directed in accordance with agreed policy and according to priorities
 - There is sound and inclusive decision making
 - There is clear accountability for the use of those resources in order to achieve desired outcomes for service users and communities
- **1.2** Governance is a term used to describe the arrangements (including political, economic, social, environmental, administrative, legal and other arrangements) put in place to ensure that the intended outcomes for stakeholders are defined and achieved.
- **1.3** Good governance enables the Council to effectively achieve its intended outcomes, whilst acting in the public interest at all times.
- 1.4 The Delivering Good Governance in Local Government Framework, sets out seven core principles of governance as detailed in the diagram below. Cotswold District Council is committed to these principles of good governance and confirms this through the adoption, monitoring and development of the document The Council's Local Code of Corporate Governance.
- 1.5 Our Local Code is underpinned by the Delivering Good Governance in Local Government; Framework and comprises policies, procedures, behaviours, and values by which the Council is controlled and governed. These key governance areas and how the Council provides assurance that is complying with these are set out in more detail within its Governance Assurance Framework.
- 1.6 The Council recognises that establishing and maintaining a culture of good governance is as important as putting in place a framework of policies and procedures. The Council expects members and officers to uphold the highest standards of conduct and behaviour and to act with openness, integrity and accountability in carrying out their duties.
- 1.7 The term 'Council' in this document, will also include its companies/partners that deliver services on behalf of the Council.
- 4.7 An addendum to the 'Delivering good governance in local government: framework was published by Solace in May 2025. The application of this addendum is for annual governance statements for 2025/26 onwards. With regards to this Local Code, the new addendum recommends the following:

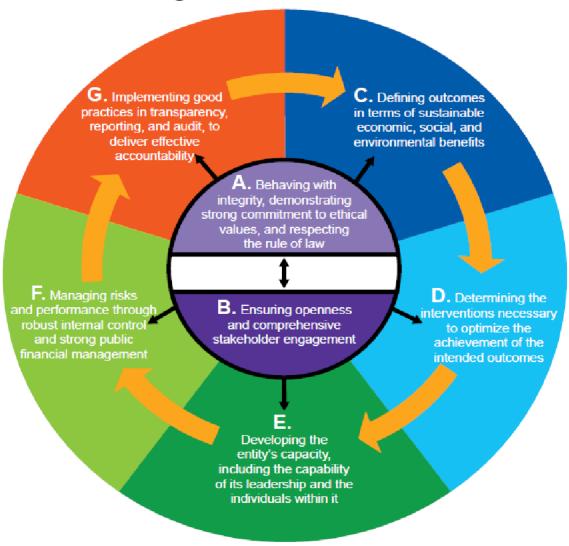
CIPFA and Solace recommend that authorities adopt a local code of governance which sets out their governance arrangements, showing how governance principles are put into practice at their authority. The code should:

- clearly align to the principles in Delivering Good Governance in Local Government: Framework,
- take account of the best value statutory guidance or other statutory requirements of the appropriate national government3,
- be up-to-date and reviewed regularly to ensure it takes account of changes in the authority and its environment,

- identify what arrangements the authority has put in place to achieve each principle, so it is specific to the authority,
- include values and behaviours as well as processes, as these influence the authority's culture,
- include how the code is reviewed and updated.

Where an authority does not have a local code, the annual review will need to first identify the arrangements it has put in place to meet the governance principles. This information should be to hand from earlier annual reviews, even when a local code has not been formally approved.

Achieving the Intended Outcomes While Acting in the Public Interest at all Times



- **1.8** This diagram illustrates how the various principles for good governance in the public sector relate to each other. Principle A and B permeate the implementation of Principles C to G.
- **1.9** Further information regarding each of the above principles and the behaviours and actions that demonstrate good governance in practice are detailed at Appendix A.

2. Status

2.1 Regulation 6(1)(a) of the Accounts and Audit Regulations 2015 requires an authority to conduct a review at least once in a year of the effectiveness of its systems of internal control and include a statement reporting on the review with any published Statement of Accounts.

This is known as an Annual Governance Statement.

2.2 The Accounts and Audit Regulations 2015 stipulate that the Annual Governance Statement must be prepared in accordance with proper practices in relation to accounts. Therefore a

local authority in England shall provide this statement in accordance with Delivering Good Governance in Local Government; Framework (2016) and this section of the Code.

3. Monitoring and Review

- 3.1 The Council will monitor its governance arrangements for their effectiveness in practice and will report them on a continuing basis to ensure that they are up to date. The Council's Governance Assurance Framework sets out in more detail how the Council will seek assurance on its adherence to the adopted principles of governance.
- 3.2 On an annual basis, the Chief Executive and Leader of the Council will publish an Annual Governance Statement which will:
 - Assess how the Council has complied with this Code of Corporate Governance
 - Provide an opinion on the effectiveness of the Council's arrangements
 - Provide details of how continual improvement in the systems of governance will be achieved.
- <u>3.3</u> The Audit <u>and Governance</u> Committee considers the Annual Governance Statement before it is published as part of the Council's financial statements.
- 3.3 1.4 The Council also produced an annual governance action plan which identifies actions for the following financial year to further improve our governance arrangements. Progress updates are reported to the Audit and Governance Committee.

4. Certification

4.1 We hereby certify our commitment to this Code of Corporate Governance and will ensure that the Council continues to review, evaluate and develop the Council's Governance arrangements to ensure continuous improvement of the Council's systems.

Joe Harris Mike Evemy Leader of the Council	Robert Weaver Jane Portman Interim Chief Executive
Date:	Date:

Principles	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
Acting in the public interest that requires a commitment to and effective arrangements for:		
Acting in the public interest that requires a commitment to and ellective arrangements for.		
A. Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of the law	Behaving with integrity	 Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff that they are communicated and understood.
		These should build on the Seven Principles of Public Life (the Nolan Principles)
Local government organisations are accountable not only for how much they		 Leading by example and using the above standard operating principles or values as a framework for decision making and other actions
spend, but also for how they use the resources under their stewardship. This includes accountability for outputs, both		 Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively
positive and negative, and for the outcomes they have achieved. In addition, they have an overarching		The organisation has a code of conduct in place for Members and officers to ensure expectations are in place for behaviours. Contracts are in place for contractors which sets out expectations.
responsibility to serve the public interest in adhering to the requirements of		 Ensuring policies and procedures are in place for Members and Officers to declare gifts,
legislation and government policies. It is		hospitality and sponsorship.
essential that, as a whole, they can		 Ensuring policies and processes are in place for Members and Officers to declare 'Conflicts of Interest'.
demonstrate the appropriateness of all		
their actions across all activities and have		 Workforce Values, People & Culture Strategy (2025 – 2028) and Implementation Plan approved at Cabinet 04.09.2025
mechanisms in place to encourage and enforce adherence to ethical values and	Demonstrating strong commitment	Seeking to establish, monitor and maintain the organisation's ethical standards and
respect the rule of the law.	to ethical values	performance
Arrangements to ensure ethical conduct for both members and	to ouriour variage	 Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation
officers, including codes of conduct, management of conflicts of interest,		Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values
declarations of gift and hospitality, training and evaluation. Arrangements covering the ethical		 Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with ethical standards expected by the organisation
behaviour of external service providers.	Respecting the rule of the law	 Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations
 Arrangements to support whistleblowing. 		Creating the conditions to ensure that the statutory officers, other key post holders, and members, are able to fulfil their responsibilities in accordance with legislative and regulatory requirements.
How compliance with laws and regulations and internal policies and procedures is ensured and		 regulatory requirements Striving to optimize the use of the full powers available for the benefit of citizens, communities and other stakeholders
arrangements to ensure expenditure		Dealing with breaches of legal and regulatory provisions effectively
is lawful.		Ensuring corruption and misuse of power are dealt with effectively
How breaches of ethical arrangements, laws, regulations and		 Whistle blowing policy in place that is communicated to our employees and is managed, monitored and reviewed three yearly, or as required.

Principles	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
Acting in the public interest that requires a commitment to and effective arrangements for:		
procedures are addressed learning adopted. How all those in governance roles senior managers demonstrate to leadership of an ethical culture		 Ensuring policies and procedures are in place, which are reviewed periodically and / or as changes are made to ensure compliance with laws, regulations and best practice.
B. Ensuring openness and comprehensive stakeholder engagement Local government is run for the purgood, organisations therefore shown ensure openness in their activities. Cleatrusted channels of communication aconsultation should be used to engageffectively with all groups of stakeholds such as individual citizens, and servusers, as well as institution stakeholders. NB: Institutional stakeholders are other organisations that local government needs to work with to improve serving and outcomes (such as commer partners and suppliers as well as of public or third sector organisations) organisations to which they accountable.	blic build ear, and age ers, vice onal the lent ces cial ther or are	 Where possible: Ensuring an open culture through demonstrating, documenting and communicating the organisation's commitment to openness Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear Using formal and informal consultation and engagement to determine the most appropriate and effective interventions / courses of action Where possible: Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcome for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively Ensuring that partnerships are based on trust A shared commitment to change A culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit
transparency, including a culture	and service users effectively sted and service users effectively	 Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve communities, individuals, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement Encouraging, collecting and evaluating the views and experiences of communities, individuals, service users and organisations of different backgrounds including reference to future needs Implementing effective feedback mechanisms in order to demonstrate how views have been taken into account

Principles	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
Acting in the public interest that requires a commitment to and effective arrangements for:		
service users and stakeholders and how these inform decision-making. The ways in which the authority communicates with the community and stakeholders		 Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity Taking account of the impact of decisions on future generations of tax payers and service users
C. Defining outcomes in terms of sustainable, economic, social and environmental benefits The long-term nature and impact of many of local government's responsibilities mean that it should define and plan outcomes and that these should be sustainable. Decisions should further the organisation's purpose, contribute to intended benefits and outcomes, and remain within the limits of authority and resources. Input from all groups of stakeholders, including citizens, service users and institutional stakeholders, is vital to the success of this process and in balancing competing demands when determining priorities for the finite resources available. • How the authority establishes its vision, target outcomes, and associated long-term plans to deliver sustainable outcomes. • Its decision-making arrangements and how it ensures consideration and demonstration of value for money and best value. • Arrangements to achieve fair access to services. • The authority's strategic approach to commissioning across the entity and its partnerships and collaborations	Sustainable, economic, social and environmental benefits	 Having a clear vision, which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the organisation's overall strategy, planning or other decisions Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer Delivering defined outcomes on a sustainable basis within the resources that will be available Identifying and managing risks to the achievement of outcomes Managing service users' expectations effectively with regard to determining priorities and make the best use of resources available Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision and ensuring best value and value for money for our residents Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs Ensuring fair access to services Ensuring strong governance arrangements are in place to commission services through our partnership organisations.

	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
Acting in the public interest that requires a commitment to and effective arrangements for:		
D. Determining the interventions necessary to optimise the achievement of the intended outcomes	Determining interventions	 Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore ensuring best value is achieved however services are provided Considering feedback from individuals and service users when making decisions about service improvements or where services are no longer required in order to prioritise
Local government achieves its intended		competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts
outcomes by providing a mixture of legal, regulatory, and practical interventions (courses of action). Determining the right	Planning Interventions	 Establishing and implementing robust planning and control cycles that cover strategic and operational plans, <u>projects, programmes</u>, priorities and targets
mix of these courses of action is a critically important strategic choice that		 Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered
local government has to make to ensure intended outcomes are achieved. They		 Considering and monitoring risks facing each partner when working collaboratively, including shared risks
need to ensure that their defined outcomes can be achieved in a way that		 Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances
provides the best trade-off between the various types of resource inputs while still enabling effective and efficient		Establishing appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured.
operations. Decisions made need to be reviewed frequently to ensure that achievement of outcomes is optimised.		 Ensuring KPIs are monitored, managed and reported with effective scrutiny and challenge.
The arrangements for medium and		 Ensuring capacity exists to generate the information required to review service quality regularly
short-term service planning, supported by projects and		 Preparing budgets in accordance with objectives, strategies and the medium term financial strategy
programmes, to ensure alignment to the vision and objectives.		Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy
 How budgets and resource strategies align to the delivery of objectives. How the authority uses self-assessment and continuous improvement to achieve value for money. The authority's performance management arrangements to ensure continued alignment to its objectives. Arrangements for the achievement of social value in commissioning. 		 Having processes and procedures in place for procurements of goods and services that are compliant with legislation and help achieve social value.
	Optimising achievement of intended outcomes	 Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints
		 Ensuring the budgeting process in all-inclusive, taking into account the full cost of operations over the medium and long term
		Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage
procurement and contracting		Ensuring we have processes in place to assess our performance including lessons learnt to ensure continuous improvement and value for money.

Acting in the public interest that requires a commitment to and effective arrangements for:		
ping the capability of the seleadership and other	 Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently Recognising the benefits of partnerships and collaborative working where added value can be achieved Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body Ensuring the leader and senior management have clearly defined and distinctive leadership roles within a structure whereby the senior management team lead in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's authority Developing the capabilities of members and senior management to achieve effective leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by: ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged Ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis Ensuring personal, organisational and system-wide development through shared learning, including lessons learnt fr	
1	oping the Council's ty oping the capability of the seadership and other luals	

Principles	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
Acting in the public interest that	requires a commitment to and effective ar	rangements for:
Troung in the public interest that	required a community to and encouve ar	rangomento for.
programmes to meet the nemembers and senior office relation to their strategic roles. • Workforce planning organisational developments for learning	nancial ode) — of the Local of the (2024) Officers ate. for the officer for the service spment eds of ers in and pment. and	* Ensuring arrangements are in place to maintain the health and wellbeing of the workforce, for our workforce to learn and develop, and support individuals in maintaining their own physical and mental wellbeing
development, and health wellbeing	and	
F. Managing risks and performance through	Managing risk	 Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making
robust internal control strong public financial	and	 Implementing robust and integrated risk management arrangements and ensuring tha they are working effectively
management		Ensuring that responsibilities for managing individual risks are clearly allocated
Local government needs to ensur	Managing performance	 Monitoring service delivery effectively including planning, specification, execution and independent post implementation review
the organisations and gover structures that it oversees implemented, and can sustain effective performance management facilitates effective efficient delivery of planned service management and internal contribution integral parts of a performanagement system and are crue	rnance have n, an gement e and s. Risk ol are mance ucial to	 Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation's financial, social and environmenta position and outlook Ensuring an effective scrutiny or/and oversight function (independent of the executive Cabinet) is in place which provides constructive challenge and debate or policies and objectives before, during and after decisions are made thereby enhancing the organisation's performance and that of any organisation for which it is responsible Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement
the achievement of outcomes.	Risk	 Ensuring there is consistency between specification stages (such as budgets) and pos implementation reporting (e.g. financial statements)

Principles	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
Acting in the public interest that requires a commitment to and effective arrangements for:		
should be considered and addressed as part of all decision making activities. A strong system of financial management is essential for the achievement of policies and the achievement of intended outcomes, as it will enforce financial discipline, strategic allocation of resources, efficient service delivery and accountability. It is also essential that a culture and structure for scrutiny are in place as a key part of accountable decision making, policy making and review. A positive working culture that accepts, promotes and encourages constructive challenge is critical to successful scrutiny and successful service delivery. Importantly, this culture does not happen automatically, it requires repeated public commitment from those in authority.	Robust internal control	 Aligning the risk management strategy and policies on internal control with achieving objectives Evaluating and monitoring risk management and internal control on a regular basis across the council, partnerships, our teckal companies and collaborations. Ensuring effective counter fraud and anti-corruption arrangements are in place Ensuring effective controls are in place for Cyber, Al, Information Security, information governance, asset management and procurement / contract management. Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided –by the internal auditor * Ensuring an audit and governance committee which is independent of the executive and accountable to the council: provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment * That its recommendations are listened to and acted upon * That conforms to Global Internal Audit Standards in the UK public sector (GIAS and the Application Note) and the CIPFA Code of Practice on the Governance of Internal Audit Arrangements are in place for overview and scrutiny
 Risk management policy, strategy and arrangements for review. How financial management arrangements align with the Financial Management Code. Internal control arrangements including: – Cyber, Al and information security arrangements – information governance – asset management – procurement and contract management. Assurance frameworks across the three lines. The framework should set out how the leadership team obtains its assurance, including from management, risk and compliance arrangements, and internal audit. Internal audit arrangements in conformance with the Global Internal Audit Standards in the UK public sector(GIAS and the Application 	Managing data Strong public financial management	 Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and control

Principles	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
Acting in the public interest that requires a commitment to and effective arrangements for:		
Note) and the CIPFA Code of Practice on the Governance of Internal Audit. Arrangements for formal overview and scrutiny (as applicable). Facilitation of internal and external challenge. Undertaking the core functions of an audit committee, as identified in Audit Committees: Practical Guidance for Local Authorities and Police (CIPFA, 2022). Counter fraud and anti-corruption developed and maintained in accordance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA, 2014). Governance, risk and control arrangements across companies, partnerships, collaborations and arm's length bodies. G. Implementing good	Implementing good practice in	 Writing and communicating reports for the public and other stakeholders in a fair,
practices in transparency, reporting, and audit to deliver effective accountability	transparency	 writing and communicating reports for the public and other stationarism a rail, balanced and understandable style appropriate to the intended audience and ensuring they are easy to access and interrogate Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand
Accountability is about ensuring that those making decisions and delivering services are answerable for them. Effective accountability is concerned not only with reporting on actions completed, but also ensuring that stakeholders are able to understand and respond as the organisation plans and carries out its activities in a transparent manner. Both external and internal audit contribute to effective accountability.	Implementing good practices in reporting	 Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way Ensuring members and senior management own the results reports Ensuring robust arrangements for assessing the extent to which the principles contained in this Framework have been applied and publishing the results on this assessment, including an action plan for improvement and evidence to demonstrate good governance (the annual governance statement) Ensuring this Framework is applied to jointly managed or shared service organisations Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations
Arrangements for the timely response and support to the work of external audit, internal audit and other inspection or regulatory action.	Assurance and effective accountability	Ensuring that all recommendations for corrective actions made by <u>internal and</u> external audit <u>or other inspections or regulatory action</u> are acted upon <u>in a timely manner</u>

Appendix A

Principles	Sub-Principles	Behaviour and actions that demonstrate good governance in practice:
	at requires a commitment to and effect	
	ementing	 Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon
How learning and improver actioned.		Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations
 How transparency and acco <u>are maintained across collal</u> and arm's length bodies, 	<u>porations</u>	 Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement
 trading companies and joint v Accountability to the put 	ventures.	 Ensuring when working in partnership, arrangements for accountability <u>and transparency</u> are clear and the need for wider public accountability has been recognised and met
stakeholders is supported assurance and ensures co	re areas	
are covered to enable accountability in practice	<u>better</u>	

Annual Governance Statement

Council

Leader and Chief Executive sign AGS on behalf of the Council

Audit and Governance Committee

Cabinet

Overview and Scrutiny Committee

Planning and Licensing Committee

Risk Management

Internal Audit

External

Audit

Counter Fraud Unit

Legal Services

Management Annual Assurance Statements Internal Management Arrangements Other external assurance e.g. RIPA Inspection Ombudsman

Performance reports, risk management and external assurance