

ANNUAL GOVERNANCE STATEMENT

SCOPE OF RESPONSIBILITY

Southampton City Council (“the council”) is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The council also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

In discharging this overall responsibility, the council is responsible for putting in place proper arrangements for the governance of its affairs, and facilitating the effective exercise of its functions, which includes arrangements for the management of risk.

The council has approved and adopted a Code of Corporate Governance that is consistent with the principles of the CIPFA/SOLACE Framework ‘Delivering Good Governance in Local Government’. A copy of the code is on our website at:

<http://www.southampton.gov.uk/policies/Code%20of%20Corporate%20Governance.pdf> or can be obtained from the:

Head of Legal and Democratic Services,
Southampton City Council,
Civic Centre,
Southampton,
SO14 7LY

This statement explains how the council has complied with the code and also meets the requirements of the Accounts and Audit (England) Regulations 2015, Part 6, which requires all relevant bodies to prepare an annual governance statement.

THE PURPOSE OF THE GOVERNANCE FRAMEWORK

The governance framework comprises the systems and processes, cultures and values by which the council is directed and controlled and its activities through which it accounts to, engages with and leads its communities. It enables the council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate services and value for money.

The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the council’s policies, aims and objectives, to evaluate the likelihood and potential impact of those risks being realised, and to manage them efficiently, effectively and economically.

The governance framework has been in place at the council for the year ended 31st March 2015 and up to the date of approval of the statement of accounts.

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THE GOVERNANCE FRAMEWORK

The key elements of the systems and processes that comprise the council's governance arrangements include arrangements for:

a) Identifying and communicating the authority's vision of its purpose and intended outcomes for citizens and service users

Service delivery is guided by a framework of strategic plans and policies which are developed and agreed at three different levels:

- Sub-regional level, which cover more than one local authority;
- City level by 'Southampton Connect' and with our partners; and
- Council level for services which we deliver or commission.

The sub-regional level is through the Partnership for Urban South Hampshire ("PUSH") and the Solent Local Enterprise Partnership ("Solent LEP"). PUSH is a collaborative partnership working arrangement between the local authorities in the area to support the sustainable economic growth of the sub region and the Solent LEP is a locally-owned partnership between businesses and local authorities and seeks to play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs.

Southampton Connect is the strategic partnership in the city which seeks to promote the city and to address the key challenges facing Southampton. This collaborative arrangement brings together the private, voluntary, public and community sectors to work together to tackle the key city challenges facing Southampton and improve outcomes for all those who live, work and visit the city.

Key strategic partners have come together (as part of Southampton Connect) to agree a 10 year vision – 'city of opportunity where everyone thrives' with the goal of achieving prosperity for all. The new Southampton City Strategy for 2015-2025 builds upon progress made by the previous priority projects and has been developed through focusing on the challenges facing Southampton, regional aspirations and feedback from residents via the City Survey (conducted in early 2014). The priorities identified within the Southampton City Strategy are:

- Economic growth with responsibility
- Skills and employment
- Healthier and safer communities.

The City Strategy also identifies the following cross-cutting themes that require the collective action of Southampton Connect partners to progress over and above the work of the strategic partnerships:

- Fostering city pride and community capacity;
- Delivering whole place thinking and innovation;
- Improving mental health; and
- Tackling poverty and inequality.

The council approved a new Southampton City Council Strategy 2014-17 ("Council Strategy") which is a key strategic document, setting out what the council will do, how the council will work and how it will contribute to the Southampton City Strategy (2015 – 2025). It sets out the council's priorities for the next three years and will influence all other strategies and policies developed during this period, as well as spending decisions; directorates and services will also use it to plan service delivery. The key priorities identified within the Council Strategy are aligned with the Southampton City Strategy.

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b) Reviewing the authority's vision and its implications for the authority's governance arrangements

The Council Strategy 2014-17 was approved by Council in July 2014 and replaces the former 2013-16 Council Plan. The Council Strategy has been refreshed in light of feedback from residents (through a pre-budget consultation survey and the City Survey conducted early 2014) and to reflect the changing local and national context.

The Council Strategy defines the council's priorities and outcomes however it is recognised that with reducing funding and demand management challenges, the council needs to establish realistic performance outcomes for these priorities. The Cabinet, the Council's Management Team and Heads of Service have developed performance outcomes for the council's priorities as part of the new operating model design.

The council has adopted a Code of Corporate Governance ("CCG") which identifies, in one document, how the council ensures that it runs itself in a lawful, structured, ethical and professional manner. The CCG is administered by the Head of Legal and Democratic Services and is subject to an annual 'light touch' review with any recommendations presented to the Governance Committee.

c) Translating the vision into objectives for the authority and its partnerships

The Council Strategy sets the direction of travel and priorities for the council and will influence all other strategies and policies developed during this period, as well as spending decisions. It sets out how the council will work, both in terms of internal processes and procedures and interactions and relationships with partners in health, private and voluntary sectors, in respect of delivering services effectively. The Council Strategy identifies the following key priorities:

- Jobs for local people
- Prevention and early intervention
- Protecting vulnerable people
- Good quality and affordable housing
- Services for all
- City pride
- A sustainable Council

The Cabinet provided clear guidance to ensure that the views of residents were reflected. Each priority has associated outcomes or 'success measures'. The council actively monitors and publishes performance against the key indicators in the Council Strategy on a quarterly basis.

d) Measuring the quality of services for users, ensure they are delivered in accordance with the authority's objectives and to ensure they represent the best use of resources and value for money

The Council Strategy identifies the key priorities, expected outcomes and success measures. The targets and progress are monitored and reported to both the Council's Management Team and Cabinet, and are published quarterly on the council's website.

In addition, all significant commercial partnership working arrangements have a range of key performance indicators which are used to verify and manage service performance. The council is committed to achieving best value from its suppliers and ensuring that goods and services are procured in the most efficient and effective way. Regular review meetings are held with key suppliers in order to ensure that contracts remain fit for purpose.

The council's 'Contract Procedure Rules', which form part of the council's Constitution, govern how the council buys the supplies, services and works that it needs.

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e) Defining and documenting the roles and responsibilities of the executive, non-executive, scrutiny and officer functions, with clear delegation arrangements and protocols for effective communication in respect of the authority and partnership arrangements

The council has a Constitution that sets out how it operates, how decisions are made (including an Officer Scheme of Delegation) and the procedures followed to ensure that these are efficient, transparent and accountable to local people. Some of these processes are required by law, while others are a matter for the council to choose. The Constitution, which is divided into 15 Articles and sets out the detailed rules governing the council's business, is published on the council's website at: <http://www.southampton.gov.uk/council-democracy/meetings/council-constitution.aspx>

f) Developing, communicating and embedding codes of conduct, defining the standards of behaviour for members and staff

The council's Constitution contains both an Officer Code of Conduct and a Members' Code of Conduct which set out the expected behavior and standards to be adhered to. In addition, a 'Code of Conduct and Disciplinary Rules' are in place for employees. The Code of Conduct sets out the expected standards of behaviour for all employees and the Disciplinary Rules set out examples of behaviour which are considered to be a breach of the Code of Conduct or a breach of the employee's contract of employment.

g) Reviewing the effectiveness of the authority's decision making framework, including delegation arrangements, decision making in partnerships and robustness of data quality

The council's Constitution details how the council operates, including how decisions are made and the role of Overview and Scrutiny. It also includes an Officer Scheme of Delegation setting out the powers, duties or functions that may be exercised under Delegated Powers. The Head of Legal and Democratic Services conducts an annual review of the council's constitutional arrangements, which is considered by the council's Governance Committee, in its governance role, prior to submission to the Annual General Meeting of the council in May.

h) Reviewing the effectiveness of the framework for identifying and managing risks and demonstrating clear accountability

The council has in place a Risk Management Policy and Strategy which is subject to annual review to ensure that it continues to reflect good practice and remains aligned with current business processes and practices. The policy and strategy is presented to the Governance Committee for review and approval.

The Governance Committee has responsibility to provide independent assurance on the adequacy of the risk management framework and the internal control and reporting environment. In addition, the Risk Management Policy and Strategy summarises the principal roles and responsibilities recognising that all employees, members and those who act on behalf of the council have a role to play in the effective management of risk.

i) Ensuring effective counter-fraud and anti-corruption arrangements are developed and maintained

The council is committed to safeguarding public funds and has in place an anti-fraud and anti-corruption policy statement and strategy. The strategy summarises the responsibilities of Members, Chief Officers and employees and outlines the process to be followed where there is suspicion of financial irregularity. The strategy applies equally to all organisations with which the Council has joint working relations.

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The council also has in place an Anti-Money Laundering policy and a Bribery Policy which are also published on the council's website and set out both the expectations and responsibilities of Members, Chief Officers and employees. These policies and strategies are subject to periodic review.

j) Ensuring effective management of change and transformation

The council's has in place a Transformation Programme which is led by a Transformation Implementation Director who, in turn, reports to the council's Transformation and Improvement Board which is chaired by the Cabinet Member for Transformation and supported by the Council's Management Team.

In July 2014 the Council approved a range of actions associated with the next phase of its Transformation Programme. This recognised that, in order to become a sustainable council that is more customer-focused, commercially minded and able to deliver the required budget savings, a systematic redesign of how services are delivered and managed was necessary. The outcome of this exercise, undertaken with external partners, was the development of a New Operating Model which was subsequently approved by Cabinet and Full Council in February 2015.

The new operating model for the Council is to be fully implemented by 2017 and is aligned with and focused on delivering the outcomes and priorities of Council Strategy 2014-17. The new operating model is intended to create a sustainable council that is:

- **more self-reliant** – over time becoming less dependent on central government funding and increasing income generation.
- **focused on outcome-based services** - regularly commissioning the services needed based on outcomes for residents, and making evidence based decisions on those services that need to be stopped or changed.
- **quicker to respond** – more able to adapt to changing circumstances and residents' needs including improving the digital offer to our customers.
- **equipped to work in new ways** – implement new ways of working for council staff, seeking new ways of reducing procurement spend and better use of assets.
- **providing a mixed economy of service providers** – taking different approaches to delivering services, taking ideas from all sectors as well as the public sector.

k) Ensuring the authority's financial management arrangements conform with the governance requirements of the CIPFA 'Statement on the Role of the Chief Financial Officer in Local Government (2010)'

The council's financial management arrangements conform to the governance requirements of the CIPFA 'Statement on the Role of the Chief Financial Officer ("CFO") in Local Government (2010)'. The CFO is professionally qualified and is a member of the Council Management Team and has direct access to the Chief Executive. The CFO is actively involved in ensuring that strategic objectives are aligned to the longer-term finance strategy. The CFO has input into all major decisions, advises the Executive on financial matters and is responsible for ensuring that budgets are agreed in advance, that the agreed budget is robust and that the finance function is fit for purpose.

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l) Ensuring the authority's assurance arrangements conform with the governance requirements of the CIPFA 'Statement on the Role of the Head of Internal Audit (2010)'

The council's assurance arrangements conform to the governance requirements of the CIPFA 'Statement on the Role of the Head of Internal Audit (2010)'. The Head of Internal Audit (Chief Internal Auditor) is professionally qualified and is responsible for reviewing and reporting on the adequacy of the council's internal control environment, including the arrangements for achieving value for money.

The Chief Internal Auditor has direct access to the Chief Executive, and to the council's Monitoring Officer where matters arise relating to Chief Executive responsibility, legality and standards. Where it is considered necessary to the proper discharge of internal audit function, the Chief Internal Auditor has direct access to elected Members of the Council and in particular those who serve on committees charged with governance (i.e. the Governance Committee).

m) Ensuring effective arrangements are in place for the discharge of the monitoring officer function

The Head of Legal and Democratic Services is designated as the Monitoring Officer with responsibility for ensuring compliance with established policies, procedures, laws and regulation, and reporting any actual or potential breaches of the law, or maladministration, to the full Council and/or to the Cabinet.

n) Ensuring effective arrangements are in place for the discharge of the head of paid service function

The Chief Executive is designated as the Head of Paid Service with responsibility for leading the Council Management Team in driving forward the strategic agenda, set by Cabinet. The Chief Executive together with the Council Management Team is responsible for the leadership and direction of the council including the co-ordination and commissioning of council-wide activity and programme management.

o) Undertaking the core functions of an audit committee, as identified in CIPFA's 'Audit Committee – Practical Guidance for Local Authorities'

The council has a formally constituted Governance Committee that undertakes the core functions of an audit committee and operates in accordance with CIPFA guidance. It provides independent assurance on the adequacy of the risk management framework, the internal control environment and the integrity of the financial reporting and annual governance statement process.

p) Ensuring compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful

'Decision Making - Corporate Standards and Guidance for Officers' is published on the internet and sets out the decision-making process, highlighting those aspects of decision making that are compulsory and must be complied with in all respects.

In addition, the council has Financial Procedure Rules which provide the framework for managing the council's financial affairs, and Contract Procedure Rules which govern the method by which the council spends money on supplies, services and works. Both documents form part of the council's Constitution.

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q) Whistle blowing and receiving and investigating complaints from the public

The council has in place 'Whistleblowing Policy' (Duty to Act) which reflects the legal framework and obligation on the council to enable staff to raise concerns which may involve unlawful conduct, illegality, financial malpractice or dangers to the public, employees or the environment. This procedure sets out the action that individuals should take to report a concern and also the action to take if, in extreme circumstances, a matter is not addressed or if they feel that raising the matter internally could result in evidence of malpractice being concealed.

There is a Corporate Complaints policy and procedure in place which is published on the council's website and sets out how a complaint will be dealt with. In accordance with legislation there are separate procedures in place in respect of Adults' and Children's Social Care. Complaints about Members are dealt with under the Members' Code of Conduct.

r) Identifying the development needs of members and senior officers in relation to their strategic roles, supported by appropriate training

A Member Development Strategy is in place which sets out how Member Learning and Development will be identified, delivered and managed. The Strategy, which was approved the Governance Committee in April 2014, refers to the following key values:

- Development will be available to all Members;
- Development will be based on the identified and agreed needs of the individual Member;
- All Members will contribute to identifying and agreeing their development needs
- Development will be delivered through a variety of methods and times to ensure equality of access; and
- An acknowledgement that Members may have transferable skills that can be used to help them perform or develop their Council role.

Senior Officer development needs form part of the annual performance appraisal process with a requirement that learning and development priorities are linked to key objectives and service plan priorities. The training needs of senior officers forms part of the "Annual Statement of Training Requirement" which reflects training needs across council. This is separated into three sections as follows:

- **Corporate / whole council**– training that is generically needed to meet wider council requirements; policy / procedure / council standards. It will often include SCC management development training, customer service and health and safety training needs.
- **Core training**– relates to the core / key knowledge and skills training needed by staff to competently and confidently deliver the specific council business e.g. residential care training / waste removal training / social work training / housing training etc.
- **Specialist**– any specialist part of the "core business". For example a smaller number of people who undertake a specialist function within the division e.g. adoption and fostering.

s) Establishing clear channels of communication with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation

The council supports the principle that people should have the opportunity to voice their opinions on issues that affect them. The views of customers are at the heart of the council's service delivery arrangements and are actively sought.

The council's website includes a 'Have your say' section which set out how residents and other

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stakeholders can voice their opinions and shape service delivery. It includes information on:

- Consultation
- E-Petitions
- Comments, compliments and complaints
- Have your say at meetings

In addition, where appropriate, public consultation is used to seek the views of residents and stakeholders. For example the 2014-15 Pre Budget consultation process helped shape the final 2015-16 budget report. Information was made available in an easy-to-understand format and respondents were informed on how their feedback was used. This was then reported to Cabinet before they made their final recommendations to Council.

The council has established a 'People's Panel', with the aim of recruiting over 1,000 volunteers to join it. This Panel comprises a group of residents who are interested in taking part in consultations and other opportunities to express their views on council services, health services and living in the city, the results of which will be used to inform future decisions and services. The council will also track residents' views over time to see how changes in the city affect their opinions and experience of the city. Members of the People's Panel may also be asked to take part in various forms of activity including surveys, quick polls, interviews and workshops.

A 'Southampton Youth Forum' has also been established. This is a mechanism for ensuring that the views of young people in the city are heard and acted upon by the council. It involves a termly meeting to discuss topics and share ideas, alongside the termly meeting online surveys will be used to gather feedback from young people.

This is in addition to the Southampton City Residents Survey which took place in 2014 and will be repeated every other year for the next five years. The survey, undertaken in partnership with other key organisations working in the city including the local Clinical Commissioning Group, Police, NHS Trusts, Fire Service and further education bodies, is an important step in building a better understanding of our residents.

t) Enhancing the accountability for service delivery and effectiveness of other public service providers

Performance in respect of the key priorities and success measures identified in the 'Council Strategy' is monitored by the Council Management Team and reported to Cabinet. Quarterly performance reports, which include success measures, key indicators and a direction of travel, are published on the council's website.

A number of the council's key services are delivered in partnership with external service providers. These outsourced contracts are managed by a centralised Contract Management Team which provides a senior management interface between the council and our partnership service providers. All such arrangements include a suite of key performance indicators and are based upon a culture of continuous improvement, recognising the need to achieve a balance between the council's ongoing financial challenges and long term strategic aims.

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u) Incorporating good governance arrangements in respect of partnerships and other joint working as identified by the Audit Commission's report on the governance of partnerships, and reflecting these in the authority's overall governance arrangements

A Partnership Code forms part of the council's Constitution and identifies the key considerations when developing a partnership including 'is there clarity of purpose and is it compelling' and 'how will decisions be made and acted upon'.

An Internal Audit review on 'Partnership Arrangements' was undertaken in 2014 which focussed on the adequacy and coverage of partnership guidance to address key risk exposure to the organisation. The overall opinion was that 'adequate assurance could be placed on the effectiveness of the framework of risk management, control and governance designed to support the achievement of management objectives'. The report did however include a number of observations mainly around updating and enhancing the 'Partnership Code' to emphasise resourcing, governance, accountability, performance and alignment to strategic aims when entering into partnership arrangements

Following the Internal Audit Review, and discussion with the Chairs of the main partnerships:

- The Chief Executive has established a Chairs' Group, comprising the Chairs of the key strategic partnerships (Southampton Connect, Health and Wellbeing Board, Safe City Partnership, Employment, Skills and Learning Partnership). The Chairs of the Local Safeguarding Children's Board and Southampton Safeguarding Adults Board have also been invited to join this group. The group will coordinate the programme of work for the year, ensuring a more joined up and consistent approach.
- Support for the key partnerships has been brought together into the council's new Strategy Unit, to ensure coordinated and effective support is provided to all Boards.
- There has been a review of the Health and Wellbeing Board in order to ensure that the Board is future proof and fit for purpose so that it can make strategic health decisions for the city in response to the needs of the local population now and in the future.
- Plans are in place to review the partnership code, raise awareness with Elected Members and develop a handbook for Board members by December 2015.
- An annual review of partnership performance and value for money will also be undertaken by the Strategy Unit and reported to the Chairs Group, CMT and Cabinet in the autumn. The intention is that this will be an internal, council focussed document, which will provide an assessment as to whether requirements are being met, and whether the council is obtaining value from the money and effort it allocates to the partnerships.

REVIEW OF EFFECTIVENESS

The council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is led by a 'Controls Assurance Management Group' (comprising the Section 151 Officer, Chair of the Governance Committee, Assistant Chief Executive, Monitoring Officer and Chief Internal Auditor).

The review process, applied in respect of maintaining and reviewing the effectiveness of the system of internal control, is informed by:-

- The views of Internal Audit regularly reported to Governance Committee via the 'Internal Audit: Progress Report' which include executive summaries of new reports published where critical weaknesses or unacceptable levels of risk were identified. In addition, where appropriate, the relevant Director and/or Head of Service being required to attend a meeting to update the Committee regarding progress and actions;
- The views of external auditors, regularly reported to the Governance Committee, including regular progress reports, the Annual Audit Letter and Audit Results Report – ISA260;

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- The Chief Internal Auditors 'Annual Report and Opinion' on the adequacy and effectiveness of the Council's internal control environment;
- The Internal Audit Charter and delivery of the annual operational plan;
- The work of the executive managers within the authority who have responsibility for the development and maintenance of the governance environment;
- The completion of an annual 'Self Assessment Statement' by Directors which covers the key processes and systems that comprise the council's governance arrangements and is intended to identify any areas where improvement or further development is required;
- Completion of an 'Assurance Framework' document which reflects the key components of the Council's overall governance and internal control environment. This document, based on CIPFA/SOLACE guidance, records the key controls in place, and sources of assurance, and identifies any significant gaps or weaknesses in key controls;
- The independent views of regulatory inspection agencies such as Ofsted and the Care Quality Commission;
- The Risk Management Policy and Strategy, specifically the Strategic and Directorate Risk Registers;
- The work of the Governance Committee in relation to the discharge of its responsibility to lead on all aspects of corporate governance.

We have been advised on the implications of the result of the review of the effectiveness of the governance framework by the Governance Committee, and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework. The areas already addressed and those to be specifically addressed with new actions planned are outlined below.

SIGNIFICANT GOVERNANCE ISSUES

The following significant governance issues have been identified:

	Governance Issue	Planned Action
1.	The published Corporate Procurement Strategy refers to the period 2009-12	The slippage is mainly due to the implementation of the 2015 Public Contract Regulations in February 2015 and the time it has taken to understand the new regulations, whilst also briefing the organisation what it needs to do to comply with the new regulations. As a result CPR's need to be completely revised to take account of both the new regulations and the fact that Capita Procurement now manage all of the councils' procurements. In addition, we are reviewing contract management and procurement as part of our operating model work with PwC.

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	Responsible Officer: Chief Financial Officer	Target for completion: December 15
2.	Business continuity plans need to be reviewed and updated to reflect the high level of organisational change that has taken place and is ongoing.	A new Business Continuity Policy and associated templates have been drafted and are to be presented to the Council's Management Team in June 15 for approval. The new Business Continuity Plan template will then rolled out across the service areas (Dec 15).
	Responsible Officer: Director of Place	Target for completion: December 15
3.	Information Governance arrangements need to be reviewed and aligned with new organisational structures and operational arrangements.	<p>(i) Review and implement appropriate arrangements to provide adequate organisational resources in each Directorate to enable compliance and oversight of information governance, to include monitoring and reviewing compliance, report breaches, ensuring action plans are implemented.</p> <p>(ii) To compile and submit the annual Information Governance NHS Toolkit to ensure data sharing can continue.</p>
	Responsible Officer (i): Head of Legal & Democratic Services September 2015	Still being compiled –Target
	Responsible Officer (ii): Director of People	COMPLETED: July 15
4.	<p>The level of employee understanding and awareness in respect of their responsibilities for the management of information is potentially inconsistent.</p> <p>Not all staff have completed the mandatory Information Governance e-learning (including Data Protection, Freedom Of Information Act and Protecting Information). There are concerns regarding the accuracy and robustness of the training database that captures training which is being urgently investigated.</p>	<p>Completion of the mandatory training needs to be rigorously enforced with a sanction in the event of continued non-compliance.</p> <p>A revised database package consolidating the components is being investigated as is a different and more appropriate style of roll out to those colleagues who do not ordinarily access IT.</p>
	Responsible Officer: Head of Legal & Democratic Services Target for completion: September 15	
5.	The skill and competencies of employees will need to be aligned with, and reflect, the organisational needs going forward.	<p>Development and delivery of a standard Corporate Induction Programme for new employees.</p> <p>Development of a management template identifying the standard required competencies and skills required. To incorporate ongoing learning requirements in respect of awareness of key policies and processes.</p> <p>Assessment of chief officer graded employees and leadership development plans put in place</p>

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	Responsible Officer: Head of Strategic HR	Target for completion: December 15
6.	Some of the documents, policies and strategies referred to in the published Code of Corporate Governance have since been updated.	Review and update document to ensure that it refers to current documents, policies and strategies
	Responsible Officer: Head of Legal & Democratic Services COMPLETED – but ongoing	

We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness, and will monitor their implementation and operation as part of our next annual review.

Signed

.....
Dawn Baxendale
(Chief Executive)
on behalf of Southampton City Council

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Councillor Simon Letts
(Leader of the Council)