

LOCAL CODE OF CORPORATE GOVERNANCE 2025



Delivering good governance in Local Government

Local Code of Corporate Governance

Good governance

Good governance is about how the Council ensures that it is doing the right things, in the right way, for the communities it serves, in a timely, inclusive, open, honest and accountable manner.

A Council's Local Code of Corporate Governance is:

“The system by which local authorities direct and control their functions and relate to their communities”

Our commitment

Brentwood Borough Council is committed to upholding the highest possible standards of good corporate governance, believing that good governance leads to high standards of management, strong performance, effective use of resources, increased public involvement and trust in the Council and ultimately good outcomes.

Good governance flows from shared values, culture and behaviour and from systems and structures. This Code of Corporate Governance is a public statement that sets out the framework through which the Council meets its commitment to good corporate governance.

The Governance Framework comprises the systems and processes, and cultures and values, by which the Council is directed and controlled and through which it accounts to, engages with and, where appropriate, leads the community. It enables the Council to monitor the achievement of its Corporate Objectives and to consider whether those objectives have led to the delivery of appropriate cost-effective services.

This local code of governance has been developed in accordance with and is consistent with the Delivering Good Governance in Local Government framework, which builds on the seven Principles for the Conduct of Individuals in Public Life, that has been developed by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE).

Core principles of good governance

The core governance principles of the council are:

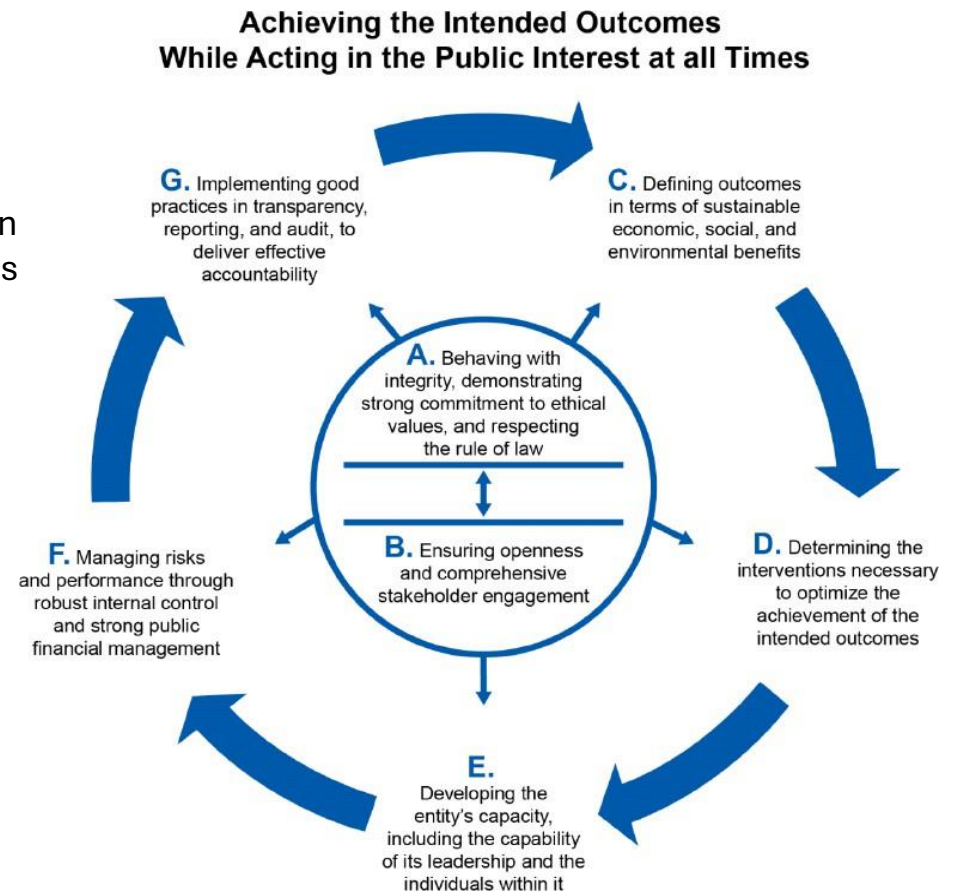
- A.** Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.
- B.** Ensuring openness and comprehensive stakeholder engagement.
- C.** Defining outcomes in terms of sustainable economic, social, and environmental benefits.
- D.** Determining the interventions necessary to optimize the achievement of the intended outcomes.
- E.** Developing the entity's capacity, including the capability of its leadership and the individuals within it.
- F.** Managing risks and performance through robust internal control and strong public financial management.
- G.** Implementing good practices in transparency, reporting, and audit, to deliver effective accountability.

Applying the core principles of good governance

This document describes how the Council achieves the seven principles of good governance and describes how the Council's corporate governance arrangements will be monitored and reviewed.

This Code takes each of the principles of good governance in turn and sets out the systems, processes and principles the Council has put in place to ensure good corporate governance.

The Code will be reviewed annually through the Annual Governance Statement process, which will identify the actions to be taken to enhance the code or address any limitations with in it.



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

Brentwood Borough Council's commitment to achieving good governance in practice includes:

- Member and officer codes of conduct and complaints procedures
- Confidential Reporting arrangements
- Counter Fraud, Bribery and Corruption Strategy
- Fraud Response Plan
- Financial Regulations and underpinning financial procedures in place
- Contract Procedure Rules
- Declaration of interests procedure
- Register of interests (Members and Senior Officers)
- Register of gifts and hospitality
- Customer feedback and complaints procedure with oversight by Management Team
- Equalities & Diversity Policy and procedures
- Equality impact assessments are undertaken
- Climate Change / Environmental impact assessment are undertaken
- Information governance policy and framework
- There is a designated Senior Information Risk Owner in post (SIRO)
- Recruitment/ selection procedures aligned with corporate ethos and values
- Customer Care training is mandatory for all front line staff
- The Council participates in the National Fraud Initiative
- Staff required to confirm that they have read and understood the Council's anti-fraud, bribery and corruption arrangements.

How we provide assurance

- Member Code of Conduct
- Officer Code of Conduct
- Independent Persons appointed
- Protocol for Member/Officer Relation
- Constitution
- Website
- Anti-Fraud, Bribery & Corruption Policy
- Whistleblowing Policy
- Internal Audit Report
- Members Register of Interest
- Complaints Policy
- Member Development Programme
- Equality and Diversity Policy
- Financial Regulations
- The Local Government and Social Care Ombudsman Annual Letter
- Recruitment Policy/Development Policy

- Internal audit plan coverage includes governance and ethics related audits, in line with the Public Sector Internal Audit Standards.
- Any planning applications submitted by staff are reviewed in public.
- Agenda management sheets of Council reports include a requirement to highlight the legal implications of decisions
- Records of regulatory training required and undertaken are retained on the Council's HR system
- The Council has an independent persons panel in place which is available for consultation regarding any conduct related complaints.
- The Council has implemented arrangements to ensure compliance with the requirements of the Homelessness Reduction Act 2018.
- Team meetings and 121s provide an additional opportunity for officers to raise any concerns they may have.

Principle B – Ensuring openness and comprehensive stakeholder engagement

Brentwood Borough Council's commitment to achieving good governance in practice includes:

- The Council publishes on its website a range of information including meeting agendas and reports, financial and procurement data, invitations to tender, senior officer salaries, the contracts register, annual governance statement and financial statements, corporate performance information, planning applications and decisions, delegated decisions and section 106 agreements.
- Records are retained detailing any decisions taken by officers using their delegated authority, including the rationale. Such decisions are also published.
- The strategic risk register is scrutinised by the Audit and Governance Committee.
- The Council consults widely and comprehensively with stakeholders on its proposals. Wider engagement takes place via the Association of South Essex Local Authorities (ASELA) and the Local Enterprise Partnership.
- All Committees have a work programme in place, with members of the public invited to recommend topics and attend annual work planning meetings.
- A Forward Plan is in place setting out what consultation will be undertaken in advance of decisions being made, and with whom.
- A register of Equality, Diversity and Inclusion activities is in place and kept up to date. Equality & diversity training is mandatory for all staff.
- A communications strategy is in place.
- Customer feedback procedures are in place.
- Active engagement with employees takes place in several ways including through a bi-annual survey, regular employee briefings, the employee network, team meetings and through the Joint Union Consultation Forum.

How we provide assurance

- Public attendance at committee meetings
- Public questions at Council
- Public speaking at Planning Committee
- Public inspection of Accounts
- Committee Report Template – Work plans
- Constitution
- Publication of all council agenda and minutes
- Partnership Agreement
- Corporate Plan 2024-2028
- Council's magazine
- Website
- Communications Strategy
- Customer Complaint Policy
- Delegation Authority
- Freedom of Information
- Equality, Diversity & Inclusion Policy
- Joint Union Consultation Forum

- Employment policies are developed in consultation with staff and trade unions.
- Cross party working groups are operated as an additional measure which ensures engagement with a broad range of stakeholders on key Council decisions.
- Council meetings are live streamed and recordings are retained on the Council's website

Principle C – Defining outcomes in terms of sustainable economic, social and environment benefits

Brentwood Borough Council's commitment to achieving good governance in practice includes:

- A Corporate Strategy is in place covering the period 2024-2028. The Plan and future strategy documents will provide clear direction to members, staff and other stakeholders. It will also inform the better use of Council resources to deliver priorities. It has not been developed in isolation and has taken account of national, regional, county-wide and local priorities.
- The Medium Term Financial Plan is regularly reviewed and updated.
- Committee reports set out the potential impacts of changes on stakeholders.
- Strategic and operational risk registers are in place.
- The Council has declared a climate emergency and has committed to address its impact on the climate.
- The Council consults widely on its proposals considering the economic, social, and environmental impacts of plans, policies, and decisions.
- There is a clear vision for Brentwood through the Corporate Strategy 2024-28 and other underpinning policy and strategy documents available on the Council's website.
- All planning and development decisions are considered openly and transparently in terms of their economic, social, and environmental benefits and impacts.
- The Council is targeting Carbon neutral by 2040, the key documents to support this is the Environmental Strategy 2023 - 2026.

How we provide assurance

- Corporate Plan 2024-2028
- Annual Governance Statement
- Medium Term Financial Plan
- Strategic and operational risk registers
- Environmental Strategy 2023 – 2026
- Website

Principle D – Determining the interventions necessary to optimize the achievement of the intend outcome

Brentwood Borough Council’s commitment to achieving good governance in practice includes:

- The Council manages performance through published national and local management performance indicators; this enables intervention to be targeted where it is needed.
- Service plans are designed to ensure that the Council targets the actions necessary to deliver the Corporate Strategy.
- Strategic risk registers are in place linked to strategic and operational targets, detailing the controls in place and the interventions planned to ensure delivery of objectives.
- Each service area is led by a Director, and dedicated member (chair) are aligned with these service areas.
- Committee reports set out the risks and options associated with decisions.
- Quarterly finance and performance reports are submitted to and reviewed by Committee.
- An annual budget report and precept setting report, is submitted to Council for approval and there is an established budget setting and monitoring process, which the Council looks to improve year on year, with greater focus on ownership and accountability.
- The Medium-Term Financial Plan is regularly reviewed and updated.
- Approved Asset Management Strategy in place.
- The Council is targeting Carbon neutral by 2040, the key documents to support this is the Environmental Strategy 2023 - 2026.
- The Council consults widely on its proposals considering the economic, social, and environmental impacts of plans, policies, and decisions.

How we provide assurance

- Service Plans
- Committee Reports – Forward Plan
- Medium-Term Financial Strategy
- Asset Management Strategy
- Environmental Strategy 2023 – 2026
- Constitution
- Annual budget report
- The Council has LGA (Local Government Association), SOLACE and CIPFA membership to ensure best practice.
- Programme Board
- Treasury Management
- Financial regulations

- There is a Forward Plan for all committees.
- A customer feedback procedure is in place.
- A Programme Board is in place to oversee delivery of the Business Plan 2020-2023.
- Key corporate projects also have governance boards in place to provide oversight and ensure effective delivery.
- Financial regulations and instructions are in place.
- Quarterly reports on treasury management activities are submitted to the Audit & Governance Committee.

Principle E – Developing the Council’s capacity, including the capability of its leadership and the individuals within it

Brentwood Borough Council’s commitment to achieving good governance in practice includes:

- Each member of the leadership team undertakes professional development appropriate to their role.
- The respective roles of the Chief Executive and Leader are clearly defined.
- The Corporate leadership team meets on a regular basis with the Leaders and Committee chairs
- Section 151 Officer, Monitoring Officer, and Senior Information Risk Owner (SIRO/ CIO – Chief Information Officer) are in post.
- The Constitution sets out roles and responsibilities and the Council’s decision-making process. An approved scheme of delegation is in place.
- Contract Standing Orders and associated toolkits are in place and are designed to ensure procurement activity is cost effective and ethical.
- Registers of gifts, hospitality, and conflicts of interest in place.
- Gifts and hospitality policy in place.
- Protocol in place setting out the relationship between and roles of members and officers.
- Member training and development programme in place, including dedicated training for planning and licensing committee members.
- Thorough induction processes are in place for all new employees and members, linked to the corporate ethos and values.
- Job profiles clearly set out the responsibilities of officers throughout the organisation.
- HR and Learning and Development Programme, and Corporate Learning Group in place.
- System of regular team meetings and one to one meetings between managers and staff.

How we provide assurance

- Member’s Development Programme
- Constitution
- Contract Standing Orders
- HR Job Description
- The Council has LGA (Local Government Association), SOLACE and CIPFA membership to ensure best practice.
- Induction programme for Officer & Members
- Exit Interviews
- Gifts and hospitality policy
- Appraisal Procedure, including periodic performance reviews
- Staff Conference
- Values and behaviours
- Probation period for new staff
- New starters meeting with Corporate Leadership Team
- Regular all staff briefings
- Learning and Development Programme
- Corporate Apprenticeship Scheme

- Employee health and wellbeing is actively promoted, and confidential employee counselling support is always available. Staff are encouraged to complete wellbeing action plans and discuss them with their line manager.
- A comprehensive suite of training and development courses is offered to all employees.
- The Council has a comprehensive suite of HR policies covering employee capability, disciplinary, recruitment and selection, disciplinary and grievance, and flexible working.
- An established Corporate Apprenticeship Scheme is in place.
- Where projects are required, teams are put in place based upon the skills and experience available.
- The Council develops the capacity of community and voluntary groups to become more self-sufficient.
- The Council participates in the Local Authority Challenge.
- Officers are encouraged to subscribe to their relevant professional bodies. This is paid for and supports Continuing Professional Development of the workforce.

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

Brentwood Borough Council's commitment to achieving good governance in practice includes:

- Risk management strategy in place, which was reviewed and updated during the year.
- Strategic and operational risk registers are in place; the strategic risk register is aligned with the corporate strategy.
- The Leadership Team, Audit & Governance Committee, Strategic Risk Management Group, and the Health & Safety Committee, all oversee the risk management arrangements.
- The Health & Safety Committee is chaired by a Strategic Director and demonstrates that senior management is taking a lead in risk management.
- A regular risk assessment of the Council's financial reserves and balances is conducted. Key risks are identified, and potential financial impacts are quantified. Reserves are reviewed annually in the context of the risk assessments.
- The annual General Fund budget and level of Council Tax are set taking into account a Section 25 statement from the Chief Officer on the robustness of adequacy of reserves.
- A Medium-Term Financial Plan is in place, and is fully updated on an annual basis.
- Financial information is published on a regular basis and established and embedded budget setting and monitoring procedures are in place.
- The Council has a 'No PO, no pay' policy in place.
- Financial regulations and instructions are in place.
- A Committee system is in place including a Scrutiny, Performance and Standards Committee and an Audit & Committee with independent Chair and Vice Chairs.

How we provide assurance

- Audit & Governance Committee
- Scrutiny, Performance and Standards Committee
- Insurance & Risk Management Strategy
- Statutory Officers
- Corporate Risk Register
- Constitution
- Anti Fraud, Bribery & Corruption Policy
- Anti-Fraud Statement
- Annual Government Statement
- Information Governance
- Data Protection Policy
- Budget Monitoring
- Medium Term Financial Plan
- RIPA (Regulation of Investigatory Powers ACT) Policy
- Health & Safety Committee
- Programme Board
- Services Plans and KPI's
- Health & Safety Committee

- Programme Board and project management framework in place.
- Training is provided to all members of Committees to ensure that they are suitably skilled to carry out their role effectively. The training is also offered to other members who may be interested in taking up future roles on these Committees.
- Counter fraud strategy, fraud response plan and confidential reporting code in place.
- The internal audit service provides an independent and objective annual report and opinion.
- Chief Officers have all completed an annual return declaring that the control environment for their area of responsibility has been followed throughout the year and that the governance arrangements set out in this document are correctly stated.
- Service planning and Key Performance Indicators (KPIs) are developed in line with the Corporate Strategy.
- Performance data is reported quarterly to Committees.
- Data sharing protocols are in place where applicable.
- Shareholders Committees in place to oversee the activity of the trading companies.

Principle G – implementing good practices in transparency, reporting and audit to deliver effect accountability

Brentwood Borough Council's commitment to achieving good governance in practice includes:

- A range of information is published including an annual report of internal audit, the financial statements, the annual report of the external auditor and this annual governance statement, which contains an action plan demonstrating a commitment to continuous improvement.
- All reports are subject to a robust internal review process to ensure they are presented in an understandable style.
- The performance information set out in the financial statements is prepared in consideration of the presentational approach adopted by other similar authorities.
- Performance data is reported to Committee and the Senior Leadership Team, and is reviewed by the Scrutiny, Performance & Standards committee.
- In accordance with the Local Government Transparency Code there is an open data section on the Council's website which includes details of senior officer salaries.
- Details of delegated decisions taken by officers are published on the website.
- Independent scrutiny training has been provided to members, the Democratic Services team and the Senior Leadership Team.
- Implementation of external audit recommendations is monitored by the Strategy Director - Resources (S151).
- Implementation of internal audit recommendations is monitored by the Strategy Director – Resources, (S151) and reported to the Audit and Governance Committee.
- The Strategy Director - Resources, (S151, Head of Audit are provided with direct unfettered access to the Chief Executive, and Chair and Vice Chairs of the Audit and Governance Committee.

How we provide assurance

- Information Governance – Policies and Procedures
- Audit & Governance Committee
- Scrutiny, Performance & Standards committee
- Annual Governance Framework (AGS)
- Annual Report and Statement of Accounts
- Regular Internal Audit progress reports
- Quarterly Financial and Performance reporting.
- Report on Freedom on information requests
- Record of Processing Activity (ROPA) – Retention Schedule.
- Member's Allowance Scheme
- Regulation of Investigatory Powers Act (RIPA)
- Local Government Transparency Code

- The Council submits itself to external peer reviews including by the Local Government Association and has welcomed an equalities and diversity peer review and challenge.
- Regulation of Investigatory Powers Act (RIPA) policy in place.
- Invitations to tender are published along with the contracts register.
- The Council prepares and publishes an annual report setting out its achievements over the last year; this is reviewed and discussed by the Audit and Governance Committee.
- Senior officers are members of and attend professional peer working groups. This helps to ensure continuous improvement and enables the Council to implement best practice

Monitoring and reporting

The Council will undertake an annual review of its governance arrangements to ensure continuing compliance with best practice to provide assurance that corporate governance arrangements are adequate and operating effectively in practice. Where reviews of the corporate governance arrangements have revealed gaps, actions will be planned to enhance the governance arrangements accordingly.

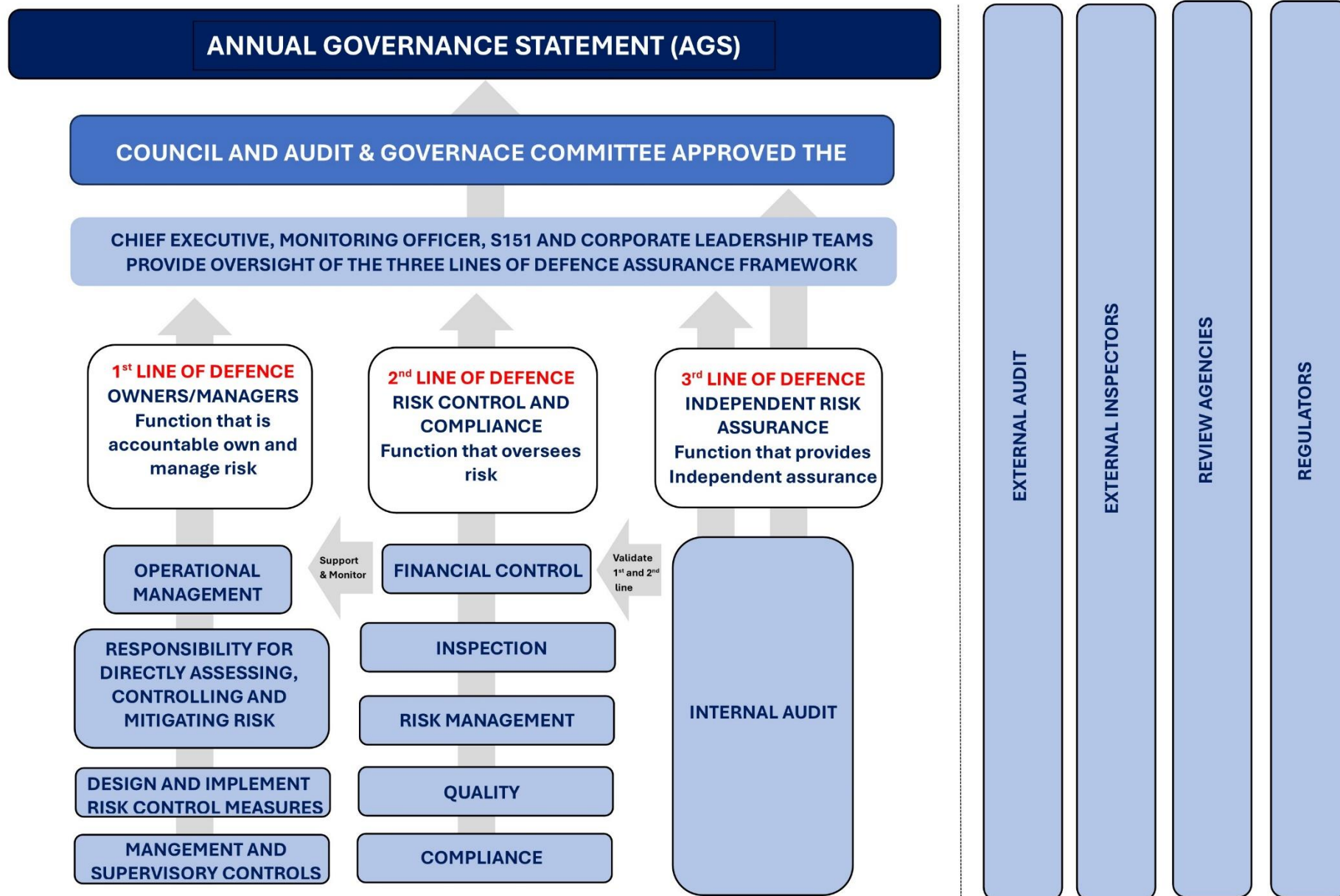
The Council will prepare an Annual Governance Statement which will be submitted to the Audit and Governance Committee for consideration and will form part of the Council's annual Statement of Accounts.

The Governance Statement will include:

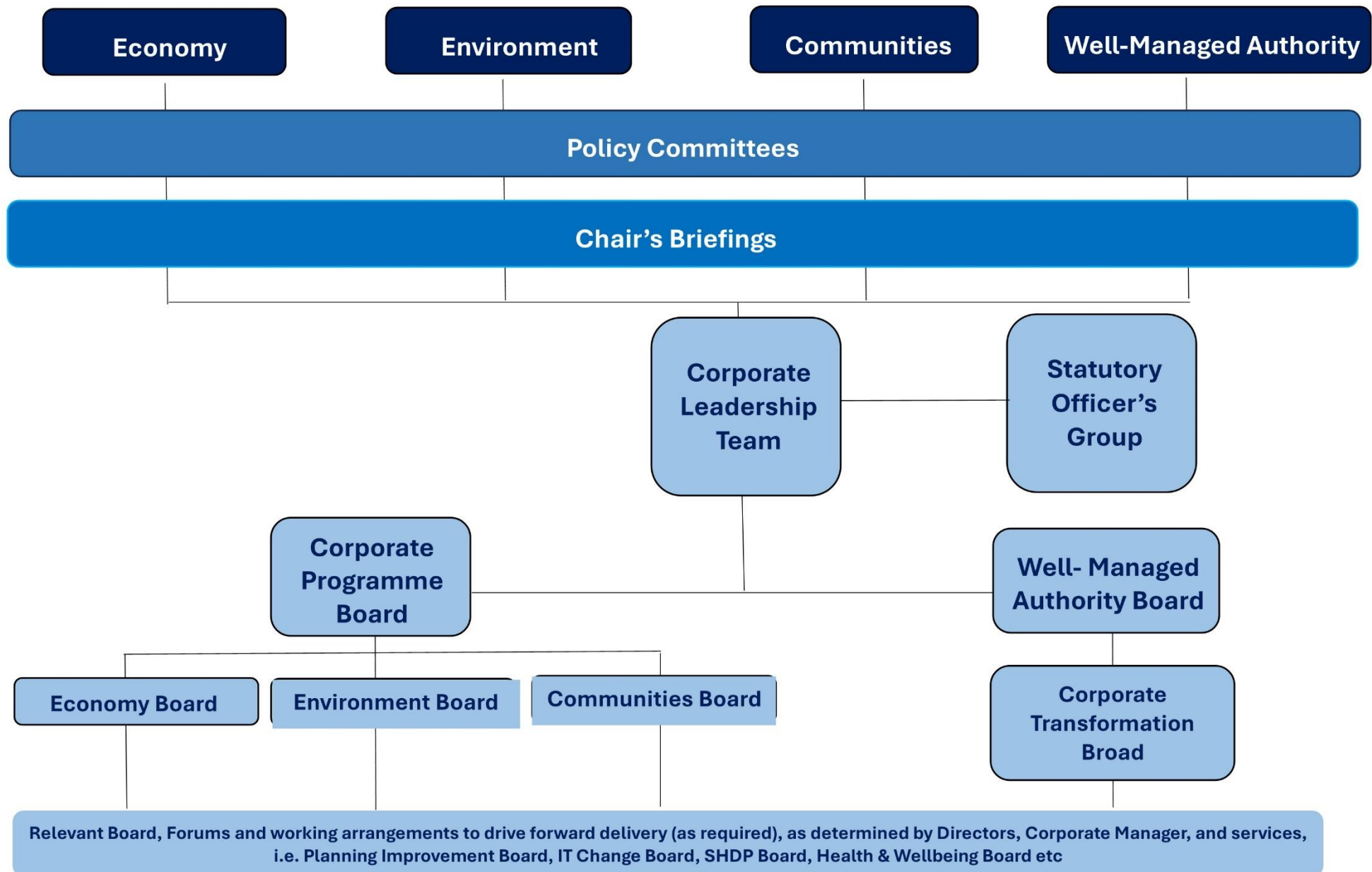
- an acknowledgement of responsibility for ensuring there is a sound system of governance (incorporating the system of internal control) and reference to the authority's code of governance;
- a reference to and assessment of the effectiveness of key elements of the governance framework and the role of those responsible for the development and maintenance of the governance environment;
- an opinion on the level of assurance that the governance arrangements can provide and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework;
- a reference to how issues raised in the previous year's annual governance statement have been progressed; and
- a conclusion including a commitment to monitoring implementation as part of the next annual review.

In reviewing and approving the Annual Governance Statement, members will be provided with detailed information regarding the effectiveness of the governance arrangements and system of internal control and how these address the key risks faced by the Council. Those assurances will be available from a wide range of sources, including internal and external audit, a range of external inspectorates and managers from across the Council.

The Council will continually strive to operate an assurance framework, embedded into its business processes, that maps corporate objectives to risks, controls and assurances. This framework and regular reports on its application and effectiveness will provide members with assurances to support the Annual Governance Statement and will help members to identify whether corporate objectives and significant business risks are being properly managed.



Corporate Governance Framework



Governance Structure

Function	Responsibilities
The Council	<ul style="list-style-type: none"> • Comprise 39 elected Member covering the 13 wards of the Borough of Brentwood • Approves the plans and strategies that form the Council's policy framework, Budgetary Framework • Approves the Constitution • Appoints Committees and Sub Committees and their Chairs and Vice-Chairs • Appoints the Leader of the Council
The Mayor	<ul style="list-style-type: none"> • Is the ceremonial civic figurehead of the Council • Is the person in charge of managing debate at Ordinary Council meetings • Is a non-political role • Is voted in every year at Annual Council
Policy Committees	<ul style="list-style-type: none"> • To approve programmes of work, monitor performance and take decisions in respect of those matters within its remit and to provide reports on the implementation of service policies. • To contribute to the budget setting process as set out in the Budget and Policy Procedure Rules set out in this Constitution. • Approval of contracts in accordance with Contract Procedure Rules. • Monitor performance in services within their remit.
Scrutiny, Performance and Standards Committee	<ul style="list-style-type: none"> • Scrutiny of decisions, performance, and standards across all Council functions, where this has not previously faced scrutiny. • Scrutiny of any area beyond the Council's direct influence that impacts the Borough of Brentwood, its residents, businesses and organisations. • Scrutinise the wider work of public sector partners. • Maintenance of Standards within the Council.

Audit & Governance Committee	<ul style="list-style-type: none"> To provide independent assurance on the adequacy of the Council's risk management framework, control environment, and governance arrangements. To oversee the Constitution and promote high standards of conduct within the Council. To review the overall budget process, including governance, controls, and compliance with statutory requirements.
Planning Committee	<ul style="list-style-type: none"> Discharge of town and country planning and development control functions. Responsible for the delivery and monitoring of the adopted Local Plan, including overseeing implementation, considering reports on performance and risks relating to Local Plan delivery, and ensuring the Council meets its statutory planning obligations.
Licensing Committee	<ul style="list-style-type: none"> Discharge of all statutory licensing and registration functions. Trading requirements, hackney carriage/private hire, animal welfare, skin piercing, sex establishments, pavement permits, charitable collections, camping/caravan sites/mobile homes, scrap metal, game dealers.

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Officer Responsibilities

Officer	Responsibilities
The Head of Paid Services (Chief Executive)	<ul style="list-style-type: none"> Overall corporate management and operational responsibility for the Council (including responsibility for all employees) The provision of professional advice to all political parties in the decision-making process and, responsibility for a system of record keeping for all the Council's decisions. Representing the Council on partnership and external bodies. Determines how the Council's functions are discharged, the number and grade of Officers required to discharge the functions and how Officers are organised into an overall operational structure.
Section 151 Officer (Strategy Director – Resources)	<ul style="list-style-type: none"> Accountable for developing and maintaining the Council's financial management and accounting framework. Ensuring lawfulness and financial prudence of decision making and the administration of financial affairs Providing advice to all Councillors on the scope of powers and authority to take decisions, maladministration, financial impropriety, probity and budget and policy framework issues, and will support and advise Councillors and Officers in their respective roles. Contributes to the effective corporate management and governance of the Council.

Monitoring Officer	<ul style="list-style-type: none"> • Monitoring, reviewing, and maintaining the Council's Constitution • Ensuring lawfulness and fairness of decision making • Ensure that Members of Code Conduct is upheld. • Contribute to the effective corporate management and governance of the Council
Corporate Leadership Team (Directors)	<ul style="list-style-type: none"> • Collectively and individually implement the policy and budgetary framework set out by the Council and provide advice to the Council on the development of future policy and budgetary issues. • Oversees the delivery of the Council's Corporate Plan and the implementation of Council policies • Responsible for developing, maintaining, and implementing the Council's governance, risk, and control framework. • Responsible for the operational management and delivery of Council services and functions. • Contribute to the effective corporate management and governance of the Council
Internal Audit	<ul style="list-style-type: none"> • Provides independent assurance and an annual opinion on the adequacy and effectiveness of the Council's risk management, governance, and internal control framework. • Through the Corporate Assurance Team, delivers an Annual Programme of risk-based assurance activity and monitors the implementation of agreed management actions to address the areas for improvement that have been identified during the course of the assurance work.

Seven principles of public life

The governance framework is supported by the [seven Principles of Public Life](#), and apply to anyone who works as a public office- holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public resources. The principles also have application to all those in other sectors delivering public services.

Selflessness	Holders of public office should act solely in terms of the public interest.
Integrity	Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
Objectivity	Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
Accountability	Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
Openness	Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
Honesty	Holders of public office should be truthful.
Leadership	Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

Certification

We hereby certify our commitment this Local 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.

A handwritten signature in black ink, appearing to read 'B. Aspinell', with a long horizontal stroke extending to the right.

Cllr Barry Aspinell
Leader of the Council

A handwritten signature in black ink, appearing to read 'Jonathan Stephenson', with a long horizontal stroke extending to the right.

Jonathan Stephenson
Chief Executive

Version Control

Major iterations and updates are published below.

Date updated	Summary of changes
7/7/2025	Presented to Audit & Governance Committee with draft AGS 2024/2025

