



Horsham  
District  
Council

# Horsham District Council: Local code of governance

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# Introduction

As set out in *Delivering good governance in local government: framework addendum May 2025*; 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.

This document sets out Horsham District Council's governance arrangements against the seven principles of good governance and evidencing how the Council meets each principle.

This framework will be reviewed annually ahead of annual review of governance. The document will be reviewed by:

- The Corporate Governance Group
- The Senior Leadership Team.

The Audit Committee will be asked to consider the robustness of this document. Changes and updates will be agreed by the Director of Resource in consultation with the Leader of the Council.

## The seven principles of good governance

The *Delivering good governance in Local Government Framework* (published by the Chartered Institute of Public Finance and Accounting (CIPFA) in 2016) sets of the **seven key principles** against which authorities should demonstrate how they comply.



CIPFA Good Governance in Local Government (CIPFA and Solace 2016)

- 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 optimise 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 practice in transparency, reporting and audit to deliver effective accountability.

# Overview of governance

## What is Governance?

Corporate Governance comprises the systems, processes, cultures and values, by which local government bodies are directed and controlled and through which they account to, engage with and where appropriate, lead their communities.

To deliver good governance in the public sector, both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times.

## Horsham District Council Structure

The Council has 48 Councillors and operates the Cabinet Executive Model.

As such, the Council has Cabinet and Full Council meetings.

The Council's Committees are:

- Audit Committee
- Communities and Place Policy and Scrutiny Committee
- Employment Committee
- Finance and Performance Policy and Scrutiny Committee
- Governance Committee
- Licencing Committee (Alcohol and Entertainment)
- Licencing Committee (Taxi and General)
- Planning Committee
- Standards Committee
- Unparished Area Committee (dissolved 23 February 2026)

## Senior Leadership Team

The Chief Executive, Director of Resources, Director of Communities and Director of Place, meet weekly as the Senior Leadership Team. Both the Section 151 Officer and the Monitoring Officer attend these meetings as the Council's senior legal and financial advisers.

## Statutory Officers and internal control

The Council's governance is supported by and guided by statutory officers:

- Head of Paid Service (Chief Executive) - responsible for directing the council's resources.
- Monitoring Officer – responsible for the lawfulness and fairness of the council's decision making, along with the standards regime and ensuring the Constitution is fit for purpose.
- Chief Finance Officer (section 151 Officer), responsible for ensuring the council conducts its financial affairs properly and in accordance with financial regulations.
- Chief Internal Auditor who has an important role in overseeing the Council's internal control arrangements.

- The three statutory officers meet bimonthly as the “Golden Triangle”.

### **Corporate Governance Group**

The Council has a Corporate Governance Group consisting of:

- Chief Financial Officer (S151 Officer)
- Monitoring Officer
- Chief Internal Auditor
- Head of Finance and Performance
- Head of Customer and Digital Services
- Performance Management Officer
- Head of HR and OD (as required)

This group meets at least quarterly to review governance arrangements.

# Core Principles and evidence

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

Local government organisations are accountable not only for how much they spend, but also for how they use the resources under their stewardship. This includes accountability for outputs, both positive and negative, and for the outcomes they have achieved. In addition, they have an overarching responsibility to serve the public interest in adhering to the requirements of legislation and government policies. It is essential that, as a whole, they can demonstrate the appropriateness of all their actions across all activities and have mechanisms in place to encourage and enforce adherence to ethical values and to respect the rule of law

Supporting principles:

- Behaving with integrity
- Demonstrating strong commitment to ethical values
- Respecting the rule of law

Theme	How the Council achieves this.
<p>1. Arrangements to ensure ethical conduct for both members and officers</p>	<ul style="list-style-type: none"> <li>• Member and Officer Codes of Conduct are included in the Constitution setting out the values and behaviours that the Council requires Members and Officers to adopt.</li> <li>• Member and Officer Registers of Interests and Gifts and Hospitality declarations safeguard both Members and officers against conflicts of interest.               <ul style="list-style-type: none"> <li>○ All Officers submit an annual declaration of interest in January, with reminders sent during the year to update where changes of circumstances have occurred.</li> <li>○ A declaration of interest is submitted on beginning employment with the Council</li> <li>○ Project based declarations of interest are completed by relevant Officers.</li> <li>○ Declarations of interests, including any conditions of approval are monitored by the Corporate Governance Group.</li> </ul> </li> <li>• Training on ethical conduct is part of the initial induction programme for officers               <ul style="list-style-type: none"> <li>○ Regular ongoing training is held to remind and reinforce these principles.</li> </ul> </li> <li>• The Chief Finance Officer undertakes annual ethics training as part of the professional qualification they hold for their role.</li> </ul>

<p>2. Arrangements covering the ethical behaviour of external service providers.</p>	<ul style="list-style-type: none"> <li>• Rules of Procedure govern the expected conduct at meetings of the Council and its committees. <ul style="list-style-type: none"> <li>○ The Council's Sustainable Procurement Charter ensures organisations working with the Council are responsible and ethical employers and are committed to supporting economic, social, and environmental improvements in the Horsham District.</li> <li>○ Contractual terms require compliance with the Modern Slavery Act 2015, the Equality Act 2010 and the Bribery Act 2010 and termination provisions for failure to comply with ethical obligations are included as appropriate.</li> </ul> </li> </ul>
<p>3. Arrangements to support whistleblowing.</p>	<ul style="list-style-type: none"> <li>• The Whistleblowing Policy ensures anyone with a concern can have confidence that it will be dealt with appropriately.</li> <li>• The Council creates trusted, multilayered reporting routes to support concerns being raised.</li> <li>• The Council ensures a culture of trust, transparency and follow-through</li> <li>• The Council embeds a “no retaliations” culture.</li> </ul>
<p>4. How (i) compliance with laws and regulations and internal policies and procedures is ensured and (ii) arrangements to ensure expenditure is lawful.</p>	<ul style="list-style-type: none"> <li>• The Counter-Fraud Strategy &amp; Framework is designed to encourage and promote the prevention and detection of fraud.</li> <li>• Money Laundering rules, including but not limited to: <ul style="list-style-type: none"> <li>○ Customer due diligence</li> <li>○ Source of funds checks</li> <li>○ Suspicious activity reporting</li> <li>○ Internal controls and staff guidance</li> <li>○ Appointment of a Money Laundering Reporting Officer (MLRO)</li> <li>○ Risk assessments.</li> </ul> </li> <li>• The Section 151 Officer ensures resources are used lawfully and responsibly by: <ul style="list-style-type: none"> <li>○ Ensuring the Council has effective financial process – this is supported by both internal and external audits.</li> <li>○ Providing objective and independent advice</li> <li>○ Ensuring the Medium-Term Financial Strategy and Annual budgets are robust and balance.</li> </ul> </li> <li>• In accordance with ‘Working Together to Safeguard Children 2015’ and ‘The Care Act 2014’, we recognise the need to ensure the welfare of all individuals when they come into contact with services provided by the Council.</li> <li>• The Constitution has a clear scheme of delegation.</li> <li>• The Council has robust decision-making frameworks.</li> <li>• The Council evaluates corporate governance standards and ensures these are aligned with best practice. I.e. CIPFA.</li> <li>• The Council has mandatory corporate policies covering HR, Finance,</li> </ul>

	<p>procurement, data protection, FOI, fraud and corruption, contract standings orders, health and safety, complaint handling. And safeguarding.</p> <ul style="list-style-type: none"> <li>• Internal control systems are embedded in operational workflows.</li> <li>• The Monitoring Officer and Section 151 Officers ensure the lawfulness of the Council's operations and financial administration,</li> <li>• The Senior Leadership Team champions compliance.</li> <li>• Use of internal audit for an independent review of controls, investigations into compliance failures and advisory work to strengthen controls.</li> <li>• External audit gives independent challenge and transparency, plus value for money audits.</li> <li>• Training modules on Safeguarding Adults and Safeguarding and Child Protection for Non-children's Service Workers are completed by all new staff members.</li> </ul>
<p>5. How breaches of ethical arrangements, laws, regulations and procedures are addressed and learning adopted.</p>	<ul style="list-style-type: none"> <li>• All officers have a regular logged conversation with their manager at which behaviours and matters of integrity can be addressed informally.</li> <li>• The Council's disciplinary process addresses officer breaches of good conduct.</li> <li>• The Standards Committee considers complaints or allegations made against Councillors, as required by the Localism Act 2011.</li> <li>• The two Policy and Scrutiny committees review breaches and suggesting improvements to policies and investigating using Task and Finish groups where significant issues are identified.</li> <li>• SIRO (Senior Information Risk Owner) is in post and oversees risk management.</li> <li>• The Corporate Governance Group meets quarterly to review all risks, data security and breaches, GDPR / FOI and declarations of interest.</li> <li>• Corporate wide informal monitoring of expected behaviours against the Officer and Members Code of Conduct.</li> <li>• Robust reporting and investigation process where required.</li> <li>• Training and open communication are embedded in the culture of the Council.</li> <li>• The Council has embedded a culture of transparency, accountability, learning and continuous improvement.</li> <li>• Managers forums, conferences and team briefings are used to cascade information, share learning and gain feedback.</li> </ul>
<p>6. How all those in governance roles and senior managers demonstrate their leadership of an ethical culture.</p>	<ul style="list-style-type: none"> <li>• Interests are declared and monitored</li> <li>• Processes are set out in the Constitution are intrinsically linked to decision making</li> <li>• Those with Governance roles and senior managers: <ul style="list-style-type: none"> <li>○ Model the behaviour they expect</li> <li>○ Encourage and welcome challenge</li> <li>○ Support strong governance</li> <li>○ Respond promptly to ethical concerns or breaches</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Champion training and awareness around ethics, standard and statutory duties</li> <li>● Register of Officers Interests updated annually</li> <li>● Specific register of interests for key projects, which requires representatives of partner organisations to also declare interests</li> </ul>
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**Principle B: Ensuring openness and comprehensive stakeholder engagement**

Local government is run for the public good, organisations therefore should ensure openness in their activities. Clear, trusted channels of communication and consultation should be used to engage effectively with all groups of stakeholders, such as individual citizens and service users, as well as institutional stakeholders.

Supporting principles:

- Openness
- Engaging comprehensively with institutional stakeholders
- Engaging with individual citizens and service users effectively

Theme	How the Council achieves this.
1. How the authority ensures that decisions are made in the public interest and the rationale for decisions is recorded.	<ul style="list-style-type: none"> <li>● The Constitution sets out how the Council operates, how decisions are made and the procedures and codes of conduct that are followed.</li> <li>● The Audit Committee is independent of Cabinet and Scrutiny functions. It receives reports on the work of External and Internal Audit and Risk Management and reviews serious Governance breaches.</li> <li>● The Governance Committee reviews and updates the Council's Constitution.</li> <li>● The Standards Committee investigates allegations of Councilors not acting in the public interest</li> <li>● Consultation takes place on the draft Annual Plan with members of the public, with results used to inform the details of the final plan.</li> <li>● All Cabinet decisions can be called into Policy and Scrutiny Committees.</li> </ul>
2. How the authority achieves expected standards of openness and transparency, including a culture of internal	<ul style="list-style-type: none"> <li>● Policy and scrutiny committees review the Council's decision-making processes and monitor the internal and external delivery of services.</li> <li>● The Council's meetings are open to the public and streamed online. The Forward Plan, Agendas, papers and minutes are published on the Council's website.</li> <li>● All public meetings are live streamed.</li> <li>● Senior management communicates with staff by means of regular cascade meetings organised by the Senior Leadership Team:</li> </ul>

challenge and self-assessment.	<p>Director’s meetings; Team meetings; All Staff Briefings; the “Council Matters” publication and weekly Leadership Team feedback.</p> <ul style="list-style-type: none"> <li>• Corporate Peer Challenges are used to improve and refine operations. Recent reviews have taken place in 2019 and 2025 with a Governance Peer Challenge in 2024. Full reports are published on the Council’s website.</li> </ul>
3. The arrangements for consultation and engagement with citizens, service users and stakeholders and how these inform decision-making.	<ul style="list-style-type: none"> <li>• The Council engages with the public in a number of public consultations. These are publicised on the Council’s website and the feedback informs the Council’s decision-making process.</li> <li>• Consultation takes place with Parish Councils and other Voluntary and Community groups throughout the District to ensure effective provision of community engagement activities.</li> <li>• ‘Always Listening, Learning and Improving’ is one of the Council’s priorities which highlights the commitment to listening to, engaging and communicating with our community.</li> </ul>
4. The ways in which the authority communicates with the community and stakeholders.	<ul style="list-style-type: none"> <li>• The Council supports local communities that produce their own Neighbourhood Plans providing a vision for their area.</li> <li>• The Council recognises that supporting and engaging communities is a shared agenda with many partners including West Sussex County Council, the Police, the Health Service and the community and voluntary sector. Examples include Winter Warm Ups, Community Safety Partnerships, Volunteer Working, and Health &amp; Wellbeing. Working together we are all committed to ensuring Horsham District remains a great area to live and work.</li> </ul>

**Principle 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.

Supporting principles:

- Sustainable economic, social and environmental benefits

Theme	How the Council achieves this.
<p>1. How the authority establishes its vision, target outcomes, and associated long-term plans to deliver sustainable outcomes.</p>	<ul style="list-style-type: none"> <li>• The Council Plan for the period 2023-27 is published on the Council's website identifies key priorities and an Annual Plan of work is produced each year.</li> <li>• Departmental worklists break down and monitor the objectives of the Annual Plan.</li> <li>• Regular updates by Directors to Cabinet members and quarterly updates on the Annual Plan to Finance and Performance Policy and Scrutiny</li> <li>• Progress against the Council's aims and objectives is monitored through its performance management framework and reported to management and Finance and Performance Policy and Scrutiny Committee.</li> <li>• Information relating to Council plans and initiatives is published via its website, email updates, social media and the Horsham District news magazine.</li> </ul>
<p>2. Its decision-making arrangements and how it ensures consideration and demonstration of value for money and best value.</p>	<ul style="list-style-type: none"> <li>• The Council ensures objectives are deliverable by producing a Medium-Term Financial Strategy and detailed financial budget plans</li> <li>• Value for money is driven through the Council's Corporate Procurement Code.</li> <li>• The Section 151 Officer reviews all reports and where necessary challenges on the financial implication of recommendations.</li> <li>• All Cabinet decisions able to be called in for Policy and Scrutiny challenge.</li> </ul>
<p>3. Arrangements to achieve fair access to services.</p>	<ul style="list-style-type: none"> <li>• An Equalities Impact Assessment is undertaken where service changes are proposed.</li> <li>• Induction module on the Equalities Act completed by all new staff as well as Bullying and Harassment in the Workplace, Dignity and Respect, and Sexual Harassment at Work modules completed as part of a rolling mandatory learning programme.</li> <li>• The Council has Disability Confident Leader status and Armed Forces Covenant Employer Recognition Scheme Silver Award. Any applicant meeting criteria under these schemes is guaranteed a job interview at The Council.</li> </ul>
<p>4. The authority's strategic approach to commissioning across the entity and its</p>	<ul style="list-style-type: none"> <li>• Pre-work collaboration with strategic partners, providers and community and voluntary sector representatives take place to support decision making.</li> <li>• Public consultation and communication and feedback take place on key projects</li> <li>• Stakeholder groups are consulted and feedback is given.</li> </ul>

partnerships and collaborations.	
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**Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes**

Local government achieves its intended outcomes by providing a mixture of legal, regulatory, and practical interventions (courses of action). Determining the right mix of these courses of action is a critically important strategic choice that local government has to make to ensure intended outcomes are achieved. They need robust decision-making mechanisms to ensure that their defined outcomes can be achieved in a way that provides the best trade-off between the various types of resource inputs while still enabling effective and efficient operations. Decisions made need to be reviewed frequently to ensure that achievement of outcomes is optimised

Supporting principles:

- Determining interventions
- Planning interventions
- Optimising achievement of intended outcomes.

Theme	How the Council achieves this.
1. The arrangements for medium and short-term service planning, supported by projects and programmes, to ensure alignment to the vision and objectives.	<ul style="list-style-type: none"> <li>• The Council’s key objectives for the year are set out in the Annual Plan. Progress against this is reported to the Finance and Performance Policy and Scrutiny Committee on a quarterly basis.</li> <li>• The Council investigates alternative models of service delivery to improve efficiency whilst meeting the needs of customers.</li> <li>• The Council’s Technology Strategy was updated during 2024 and the Digital Strategy introduced ensure service delivery is supported efficiently and flexibly.</li> <li>• The Corporate Projects Team have introduced a new project management methodology tool helping to align objectives.</li> <li>• Staff have regular one-to-one meetings and annual appraisals with their line manager in which objectives are set, progress discussed and updated.</li> </ul>
2. How budgets and resource strategies align to the delivery of objectives.	<ul style="list-style-type: none"> <li>• The Medium-Term Financial Strategy is updated at least twice a year and takes into account changes in the financial outlook. It is used as a basis for the annual budget setting process in which all Heads of Service reconsider their departmental budgets. The Annual Budget and Council Tax rate are approved by full Council before the start of each financial year.</li> <li>• The capital programme reflects delivery of environmental, housing, public realm, property, and community objectives.</li> </ul>
3. How the authority uses self-assessment	<ul style="list-style-type: none"> <li>• Progress against the budget and key performance indicators are reviewed and reported quarterly to the Finance and Performance Policy and Scrutiny Committee.</li> <li>• SLT reviews and challenges performance on a quarterly basis, with managers discussing performance through 1-1s.</li> </ul>

and continuous improvement to achieve value for money.	<ul style="list-style-type: none"> <li>The authority participates fully in the LGA's peer review programme. In the last three years, it has held a Governance Peer Challenge, a communications health check and a corporate peer challenge.</li> </ul>
4. The authority's performance management arrangements to ensure continued alignment to its objectives.	<ul style="list-style-type: none"> <li>The Council sets KPIs to align with the Council Plan and reviews annually to ensure alignment with the Annual Plan.</li> <li>Benchmarking against others provides information that assists the Council to design services that are fit for purpose by looking at options to improve delivery.</li> <li>Officers have regularly set and reviewed targets linked to statutory requirements and the Annual Plan and logged in a one to one at least every 3 months on the Council's HR system.</li> </ul>
5. Arrangements for the achievement of social value in commissioning, procurement and contracting.	<ul style="list-style-type: none"> <li>The Council's procurement code requires the Council to have regard to economic, social and environmental and wellbeing in connection with any services contract above the threshold. It may also be applied voluntarily to other contracts.</li> </ul>

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

Local government needs appropriate structures and leadership, as well as people with the right skills, appropriate qualifications and mindset, to operate efficiently and effectively and achieve intended outcomes within the specified periods. A local government organisation must ensure that it has both the capacity to fulfil its own mandate and to make certain that there are policies in place to guarantee that its management has the operational capacity for the organisation as a whole. Because both individuals and the environment in which an organisation operates will change over time, there will be a continuous need to develop its capacity as well as the skills and experience of individual staff members. Leadership in local government is strengthened by the participation of people with many different types of backgrounds, reflecting the structure and diversity of communities.

Supporting principles:

- Developing the entity's capacity
- Developing the capability of the entity's leadership and other individuals

Theme	How the Council achieves this.
<p>1. Member and officer protocols and clarity over roles and responsibilities, including schemes of delegation.</p>	<ul style="list-style-type: none"> <li>• The Constitution sets out how the Council operates; how decisions are made and which Codes of Conduct are followed. The roles of Members are clearly set out and a Member/Officer protocol is included. This is covered in both officer and member training</li> <li>• A Scheme of Delegation in the Constitution determines the levels at which decisions are taken and officers are regularly trained in compliance including during induction.</li> <li>• Additional training sessions on decision making and delegation of functions are provided by the Monitoring Officer</li> <li>• Intranet pages provide flow charts and guidance for officers.</li> </ul>
<p>2. Application of the Code of Practice on Good Governance for Local Authority Statutory Officers.</p>	<ul style="list-style-type: none"> <li>• Detailed regulations in the Constitution (for example Financial Procedure Rules and Contract Procedure Rules) require officer compliance.</li> <li>• The golden triangle meetings, ensure good administrative, financial and ethical governance of the council in the exercise of its functions. Such officers being mindful of the seven principles as listed on page 4 of this document.</li> </ul>
<p>3. How financial management roles align with:</p> <ul style="list-style-type: none"> <li>– CIPFA Financial Management Code (FM Code)</li> <li>– CIPFA Statement on the Role of the Chief Financial Officer in Local Government (2015),</li> </ul>	<ul style="list-style-type: none"> <li>• The Senior Leadership Team and Heads of Service have collective responsibility for compliance with financial standards, transparent reporting, value-for-money arrangements and risk management.</li> <li>• The Section 151 officer is a key member of the Senior Leadership Team and involved in all material business decisions, all committee reports include financial implications which are reviewed by the Section 151 officer.</li> <li>• The Section 151 officer is a qualified member of CIPFA and four members of the finance team are also qualified accountants and comply with the international standards enforced by their professional bodies.</li> </ul>
<p>4. The arrangements in place for the discharge of the monitoring officer function.</p>	<ul style="list-style-type: none"> <li>• There is a named Monitoring Officer and 2 named Deputy Monitoring Officer</li> <li>• There is a team that manage all Standards matters</li> <li>• The monitoring officer reviews all committee reports, including legal implications of decisions.</li> <li>• The Monitoring Officer has access to all Council information, meetings and decision-making processes.</li> </ul>

	<ul style="list-style-type: none"> <li>• Member Officer training programme.</li> <li>• Regular reviews and updates of the Council's constitution take place,</li> <li>• Procedures in place for issuing and responding to Monitoring Officer's statutory reports.</li> <li>• Close working with the Section 151 Officer and Head of Paid Service under the statutory officers' golden triangle.</li> <li>• Access to external legal advice, where specialist or independent advice is required.</li> <li>• Corporate culture of promoting openness and early reporting so issues reach Monitoring Officer before they escalate.</li> <li>• Adequate resourcing in Legal and Democratic Services to support role.</li> <li>• Sufficient seniority and independence for Monitoring Officer to raise concerns without fear of reprisal.</li> <li>• Direct access to Chief Executive, Leader and Statutory Officers when governance or legality concerns arise.</li> <li>• Whistleblowing and complaints arrangement allow concerns to be escalated to Monitoring Officer without delay where appropriate.</li> </ul>
5. The arrangements in place for the discharge of the head of paid service function.	<ul style="list-style-type: none"> <li>• The Chief Executive is appointed as Head of Paid Service by the Council on the recommendation of the Employment Committee.</li> <li>• The Head of Paid Service has 6 weekly meetings with the Head of Human Resources and Organisational Development and Chairs the Council's Organisational Development Group</li> <li>• The Head of Human Resources and Organisational Development reports 6 weekly to the Senior Leadership Team.</li> <li>• All organisational changes are approved by either the Head of Paid Service or, if more significant, the whole Senior Leadership Team.</li> </ul>
6. Induction and development programmes to meet the needs of members and senior officers in relation to their strategic roles.	<ul style="list-style-type: none"> <li>• A full induction programme takes place on the election of the new Council every four years and individual induction for new Councillors elected through by-elections.</li> <li>• There is a Members development framework to assist all councillors to plan their training and there is a separate budget for their training.</li> <li>• The Council has membership of the Local Government Association, South East Councils and the District Councils' network which give them access to training, conferences and mentors.</li> <li>• All officers complete a programme of induction modules as well as a Corporate Induction day with the Senior Leadership Team. Every six months officers are required to complete a set of mandatory learning modules</li> <li>• Development programmes in leadership, management, soft skills and role specific training are available to all officers.</li> <li>• Strategic managers have access to SOLACE/LGA/CIPFA development programmes, coaches and mentors.</li> </ul>
7. Workforce planning and	<ul style="list-style-type: none"> <li>• The Organisational Development Group is chaired by the Head of Paid Service and officers from across the organisation, and its trade unions work together.</li> </ul>

<p>organisational development.</p>	<ul style="list-style-type: none"> <li>• The Council’s annual Organisational Development and Workforce Plans aim to build a productive, collaborative and diverse workforce that is valued, digitally capable, and focused on delivering user-centred public services.</li> <li>• Monthly Senior Managers’ Forums and biannual Managers’ Conferences enable managers to meet to consider current issues affecting the Council and to work together to identify solutions.</li> <li>• The Council participates in the Local Government Graduate Programme.</li> <li>• Further funds have been made available to support officers to develop themselves and support career progression.</li> <li>• Progression both within and across teams is strongly encouraged and facilitated where possible at all levels.</li> </ul>
<p>8. Arrangements for learning and development, and health and wellbeing.</p>	<ul style="list-style-type: none"> <li>• Officer development is available via a number of routes including an internal coaching programme, availability of apprenticeship training courses, training programmes funded by the Council, soft skills training delivered by a training consortium, in-house sessions delivered by subject matter experts and a vast array of online training resources.</li> <li>• All managers are invited to undertake training in coaching skills to further the development of the workforce.</li> <li>• A cohort of Officers are trained Mental Health First Aiders.</li> <li>• Regular staff talks are delivered on Wellbeing topics and the support available.</li> <li>• An Employee Assistance Programme is available to all Members and Officers in the form of a confidential 24/7 phonenumber and website.</li> <li>• Various external services such as Able Futures, Horsham District Wellbeing and Sussex Mental Health line are promoted to Officers via the Intranet</li> <li>• Specific training courses on subjects including wellbeing, managing anxiety mindset, stress management, menopause work-life balance and many others are available both as training courses and e-learning resources.</li> <li>• Additional Health and Wellbeing support is provided by the Unions.</li> </ul>

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

Local government needs to ensure that the organisations and governance structures that it oversees have implemented, and can sustain, an effective performance management system that facilitates effective and efficient delivery of planned services. Risk management and internal control are important and integral parts of a performance management system and are crucial to

the achievement of outcomes. Risk should be considered and addressed as part of all decision making activities.

A strong system of financial management is essential for the implementation 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

Supporting principles:

- Managing risk
- Managing performance
- Robust internal control
- Managing data

Theme	How the Council achieves this.
1. Risk management policy, strategy and arrangements for review.	<ul style="list-style-type: none"> <li>• The Audit Committee meets four times a year to review the effectiveness of the control environment and risk management framework.</li> <li>• The Council has an established Risk Management Strategy and embedded Risk Management processes. Corporate and Departmental risks are formally reviewed quarterly.</li> <li>• The risk management framework is reviewed annually.</li> <li>• Responsible officers and Action officers for risks attend refresher training six-monthly.</li> </ul>
2. How financial management arrangements align with the Financial Management Code.	<ul style="list-style-type: none"> <li>• Financial management arrangements align with the CIPFA Financial Management Code by adopting a principle-based approach that embeds sound financial practices into the organisational culture, rather than just treating them as compliance tasks. The Financial Management Code requires local authorities to demonstrate that their processes satisfy specific standards of good financial management, which are tailored to the authority's size, responsibilities, and risk profile.</li> </ul>
Internal control arrangements including:  - Cyber, AI and information security arrangements	<ul style="list-style-type: none"> <li>• The Council has a 400 day annual internal audit plan, the results of which are reported to Audit Committee.</li> <li>• The Council has policies covering Cyber, AI and Information security and Council' ICT Team provide Cyber Security arrangements to minimise the risk to Council in the event of a Cyber-attack.</li> <li>• The Council employs an Information Governance Manager</li> </ul>

<ul style="list-style-type: none"> <li>- information governance</li> <li>- asset management</li> <li>- procurement and contract management</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance is available for all staff on the Council’s Intranet on Information Governance, asset management and procurement and contract management.</li> </ul>
<p>3. 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.</p>	<ul style="list-style-type: none"> <li>• Assurance framework in place and reviewed annually.</li> </ul>
<p>4. Internal audit arrangements in conformance with the 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.</p>	<ul style="list-style-type: none"> <li>• An annual internal audit plan is developed, in consultation with senior managers, which outlines the assignments to be carried out and estimated resources. The audit plan is sufficiently flexible to enable the Orbis Partnership Internal Audit team to respond to changing risks and priorities of the organisation</li> <li>• The Council has completed a self-assessment against CIPFA’s Code of Practice for the Governance of Internal Audit in UK Local Government. The Report was delivered to Audit Committee on 10 September 2025.</li> </ul>
<p>5. Arrangements for formal overview and scrutiny (as applicable).</p>	<ul style="list-style-type: none"> <li>• The Council has two Policy and Scrutiny Committees: Finance &amp; Performance and Communities and Place.</li> <li>• The Policy and Scrutiny Committees meet 6 times a year prior to Cabinet. They can call extra meetings.</li> <li>• Each Policy and Scrutiny Committee can have up to three task and finish groups operating at any one time.</li> <li>• The Chairmen of the Policy and Scrutiny Committees meet the Leader and Senior Officer once every cycle.</li> </ul>

	<ul style="list-style-type: none"> <li>• The Finance &amp; Performance Policy and Scrutiny Committee is supported by the Director of Resources and the Communities and Place Policy &amp; Scrutiny Committee is supported by the Directors of Communities and Place.</li> <li>• Agendas and minutes of Council/Committee meetings are published on the Council's website.</li> </ul>
<p>6. Facilitation of internal and external challenge.</p>	<ul style="list-style-type: none"> <li>• The Chief Internal Auditor reports to the Audit Committee. Audit work is planned to ensure there are robust systems of internal control in place to mitigate risks and provide assurance to senior management and Members.</li> <li>• The Council takes up the Governments/LGA's offer of a 5 yearly Corporate Peer Challenge. The last Corporate Peer Challenge was in February 2026.</li> <li>• The Council asked for a Governance Peer Challenge in 2024 and purchased a Communications Health Check from the LGA in 2025.</li> <li>• Cabinet members and senior strategic officers use the LGA/SOLACE/CIPFA mentoring and coaching services when needed.</li> </ul>
<p>7. Undertaking the core functions of an audit committee, as identified in Audit Committees: Practical Guidance for Local Authorities and Police (CIPFA, 2022).</p>	<ul style="list-style-type: none"> <li>• The Council has an Audit Committee that meets four times a year.</li> <li>• The Committees terms of reference are set out in the Council's Constitution under Committees and Subcommittees 1.5.2</li> </ul>
<p>8. 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).</p>	<ul style="list-style-type: none"> <li>• The Council assesses its exposure to internal and external fraud and corruption risks by undertaking robust risk assessment to monitor vulnerabilities.</li> <li>• The Council's Counter Fraud Strategy and Framework sets out the Council approach.</li> </ul>

<p>9. Governance, risk and control arrangements across companies, partnerships, collaborations and arm's length bodies.</p>	<ul style="list-style-type: none"><li>• The Council's Housing Companies have a separate External Audit which is not undertaken by the Council's external auditor.</li></ul>
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## Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability

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.

Supporting principles:

- Implementing good practice in transparency
- Implementing good practices in reporting
- Assurance and effective accountability

Theme	How the Council achieves this.
1. Arrangements for the timely response and support to the work of external audit, internal audit and other inspection or regulatory action.	<ul style="list-style-type: none"> <li>• The Council has an effective Internal Audit service which reports to the Audit Committee. Progress to implement agreed actions for improvement in control processes is monitored by the Senior Leadership Team and is reported to members.</li> </ul>
2. Approach to welcoming external challenge and implementing recommendations	<ul style="list-style-type: none"> <li>• The Council takes up the Governments/LGA's offer of a 5 yearly Corporate Peer Challenge. The last Corporate Peer Challenge was in February 2026. The previous review was in 2019.</li> <li>• The Council asked for a Governance Peer Challenge in 2024 and purchased a Communications Health Check from the LGA in 2025. The Council regularly commissions reviews of services from external organisations, especially where performance is below optimal levels.</li> </ul>
3. How learning and improvement are actioned.	<ul style="list-style-type: none"> <li>• Action plans of major reviews such as LGA Peer Challenges are taken to Council and discussed in public.</li> <li>• Action plans from procured reviews are reviewed by the officer leadership team and discussed with Cabinet members.</li> </ul>
3. How transparency and accountability are maintained across collaborations and	<ul style="list-style-type: none"> <li>• The Council has two Housing companies. <ul style="list-style-type: none"> <li>○ transparency and accountability are maintained through a combination of structured governance frameworks, separate financial reporting, and clear, documented accountability lines between the Council and the entity.</li> </ul> </li> </ul>

<p>arm's length bodies, such as trading companies and joint ventures.</p>	
<p>4. Accountability to the public and stakeholders is supported by clear assurance and ensures core areas are covered to enable better accountability in practice</p>	<ul style="list-style-type: none"> <li>• All committee agendas, papers and minutes are available to the public on the Council's</li> <li>• Website along with recordings of all public meetings.</li> <li>• The Council publishes its Audited Annual Accounts and Annual Governance Statement including an action plan for improvement for any areas of concern.</li> <li>• All external audit reports are published and corrective action is taken to address any issues highlighted as necessary.</li> <li>• All internal audit reports are reported Audit Committee.</li> </ul>