

Ethical Governance Diagnostic

Wirral Borough Council

Audit 2007/08

Date

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The Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission explains the respective responsibilities of auditors and of the audited body. Reports prepared by appointed auditors are addressed to non-executive directors/members or officers. They are prepared for the sole use of the audited body. Auditors accept no responsibility to:

- any director/member or officer in their individual capacity; or
- any third party.

Introduction

- 1 Confidence in local democracy is a cornerstone of our way of life. It can only be achieved when elected and co-opted members of local authorities are seen to live up to the high standards the public has a right to expect from them.
- 2 In recent years there has been an increased emphasis on standards and conduct in public life. The findings of the Committee on Standards in Public Life, the Local Government Act 2000 and the introduction of the Standards Board for England (SBE) are all factors in the current weighting being given to the need for strong ethical governance in local councils. This was also reinforced by the Chief Executive of the Standards Board for England in his November 2006 letter to local authority Chief Executives where he stressed the roles of Chief Executives and leading members in influencing organisational culture and supporting the ethical environment.
- 3 High ethical standards are the cornerstone of good governance. They are an integral part of good corporate governance arrangements and can lead to increased confidence in local democracy and better public services. Setting high ethical standards is an important building block for councils in developing their community leadership role and improving services to the community. Councils are also becoming involved in increasingly complex partnerships and poor ethical standards may adversely affect these arrangements.
- 4 Ethical governance is an area of great interest to the national and local press, particularly when things go wrong. Local authorities and individual members face a number of risks, including investigation for alleged breaches of the code of conduct, sometimes leading to the disqualification of members, loss of confidence and trust in individual members, councils and local democracy and poor decision-making.
- 5 On average, one member a week was removed from office in 2006. Other sanctions have included formal censure and suspension from using council facilities. Reasons included because of bullying behaviour, misuse of council resources, bringing the council into disrepute and using the position as a member for personal gain. The high number of disqualifications has now reduced.
- 6 One of the common aspects of governance failures is not the absence of frameworks, controls and arrangements but the absence of appropriate behaviours and values amongst members and officers. This audit therefore looks at your compliance with statutory requirements and also at behaviour, culture and values.

What do we mean by ethical governance?

- 7 We use the term 'ethics' as defined by the House of Commons: Public Administration Select Committee: Ethics and standards - the regulation of conduct in public life, 2007.

8 The committee defined 'ethics' to mean:

“the qualities of good governance, such as integrity, legitimacy, accountability, and adherence to a commonly understood standard of behaviour”.

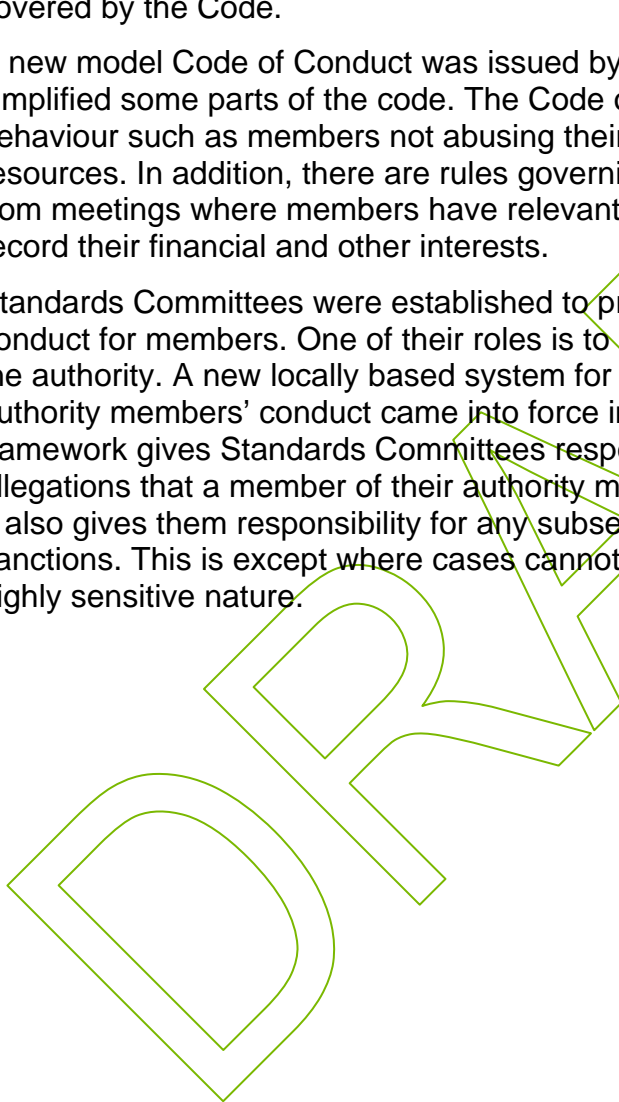
9 This definition is based on the work of the Committee on Standards in Public and its Principles of Public Life, often known as the Nolan Principles, after Lord Nolan, the chair of the committee at that time:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership.

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Background

- 10 This work is based on the requirements of the Local Government Act, 2000 Part III and the Local Government and Public Involvement in Health Act 2007. Every local authority is required to adopt a members' Code of Conduct that sets out the rules governing the behaviour of its members. All elected, co-opted and independent members of local authorities, including parish councils, fire, police and national park authorities, are covered by the Code.
- 11 A new model Code of Conduct was issued by the government in April 2007. This simplified some parts of the code. The Code of Conduct covers areas of individual behaviour such as members not abusing their position or not misusing their authority's resources. In addition, there are rules governing disclosure of interest and withdrawal from meetings where members have relevant interests. Members are also required to record their financial and other interests.
- 12 Standards Committees were established to promote and maintain high standards of conduct for members. One of their roles is to create a sense of 'ethical well-being' in the authority. A new locally based system for dealing with complaints about local authority members' conduct came into force in May 2008. The new standards framework gives Standards Committees responsibility for the initial assessment of all allegations that a member of their authority may have breached the Code of Conduct. It also gives them responsibility for any subsequent investigations, decisions and sanctions. This is except where cases cannot be handled locally because of their highly sensitive nature.



Scope and objectives

13 The aim of this work is to assess how far:

- the Council is complying with Part III of the Local Government Act 2000 and the relevant sections of the Local Government and Public Involvement in Health Act 2007;
- the Council is ensuring that the Standards Committee had access to the right information and support to enable it to do its job properly;
- members and officers understand and are aware of ethical issues;
- members are abiding by the Code of Conduct; and
- members and officers have training needs in this area.

14 This work covers four areas:

- Balancing rules and trust - how far the Council is supporting the genuine motivation of people while ensuring that those who do breach the rules are challenged.
- Independent overview - how far the Council is monitoring, developing and promoting the Council's approach to the ethical agenda and how far this is delivering improvement.
- Leadership - how far the Council is encouraging good conduct in the Council, including in relation to the equalities and diversity agenda.
- Transparency - how far the Council is ensuring transparency in the way it carries out its business.

15 As a result of this work councillors and officers should:

- be more aware of the progress that the Council has made in delivering the ethical agenda;
- have a better understanding of the ethical health of the Council; and
- have a better understanding of what, if any, further action is needed to meet the desired standards.

To be of the most benefit to the Council, it is vital that this review has the commitment and support of senior officers and all political parties. To this end, we plan to agree the brief with Cabinet and with the opposition party.

Audit approach

- 16 The audit comprises three parts, the first two of which are covered by our audit programme:
- Part (1) of the work is an electronic survey of all members and senior staff in the organisation. See Appendix 4 for the questions included in the survey. The survey is confidential and respondents will not be identified. All results will be fed back in an anonymous format and will not be attributed to individuals. The survey uses SNAP – an online survey tool. It runs on an Audit Commission server and so the Council doesn't need to buy or have any software loaded. We give the client an internet address to allow them to access the survey - see Appendix 3 for an example standard letter to be sent out. Staff or members at the Council site who are to complete the survey will need desktop access to the internet. We also ask the Monitoring Officer to complete a set of questions - see appendix 5. In order to ensure that we can compare your position with other councils that have benefited from this audit we do not plan to change any of the questions;
 - Part (2) is a detailed assessment of how well your organisation's ethical governance arrangements are working. - including a document review (see appendix 1), interviews and focus groups - see appendix 2 for the list of possible meetings; and
 - Part (3) is workshops which can follow from the detailed tool and survey. They are designed to pick up on issues raised in the previous two parts of the work and to move the organisation to the next stage of its development. The workshops can be delivered either to members or to senior staff or to members and staff together. They use scenarios and ask participants to discuss the issues that the scenarios present – both in respect of whether the Local Government Act Part III has been breached and what should be done to improve the arrangements and understanding. We will discuss the appropriate format for any workshops and which scenarios to introduce with the Council.
- 17 Throughout the audit we will maintain confidentiality and focus on issues and not individual people.

Reporting and timescales

- 18 We will provide the Council with a summary report, including an analysis of the survey, plus recommendations for improvement. The report will be based on our findings following the electronic survey of members and senior officers, the document review, member and officer interviews and focus groups with staff.
- 19 The actual nature of further end product(s) will be agreed with the Council once the work is nearer completion. These could also include workshops to address our findings. Further work is not at the moment included in our audit and inspection plans but will need to be the subject of discussion to agree whether we are required to address it as part of our risk based audit or as further work under our Advice and Assistance powers.

Task	Target date for completion
Set up meeting to finalise brief	November 2008
Survey	December 2008
Document review, interviews and focus groups	January/February 2009
Client feedback	March 2009
Workshops	To be agreed

Audit personnel and key contacts

Audit Commission staff involved in the work will be.

Liz Temple-Murray, Audit Manager l-temple-murray@audit-commission.gov.uk Tel 0151 666 3483	David Brown, Performance Specialist da-brown@audit-commission.gov.uk Tel 0844 798 7019
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The contacts from the authority will be.

Bill Norman, Director HR, Law and Asset Management (Lead Director) billnorman@wirral.gov.uk Tel 0151 691 8497	Simon Goacher, Head of Law (key contact) simongoacher@wirral.gov.uk Tel 0151 691 8498
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Appendix 1: Document request

Copies of the following documents will be needed before we commence the audit

Please indicate whether we can access any documents via the Council's website

- Council constitution
- Members' code of conduct
- Officers' code of conduct
- Standards Committee terms of reference
- Standards Committee agendas, minutes, annual report and supporting papers
- Schedule of proposed activities for the following year/annual plan
- Appointment of independent members to Standards Committees - details
- And any related job descriptions, person specifications etc
- Standards, protocols and procedures for handling investigations
- Member training/guidance/information in this area - details
- And details of attendance including evaluations
- Work undertaken by external bodies with the Standards Committee - details
- Complaints to the Standards Committee - details
- And details of any outcomes
- Resident and staff surveys – full results
- Any other relevant documentation

Appendix 2: Interviews/focus groups

20 We ask to see the following people

Possible interviews	Possible focus groups
Leader of the Council	Democratic services staff
Deputy Leader of the Council	Senior managers
Leader of the opposition	Non-executive members of each of the parties
Whip of each party	
Chair of the Standards Committee	Partners [to be agreed]
Standards Committee - a member representative from each of the parties	Users [to be agreed]
Chair of Scrutiny Committee	
Independent member	
Chief Executive	
Monitoring Officer	
S151 Officer	
Directors of departments	



Appendix 3: Audit Part (1) SNAP survey - draft letter

Wirral Council

Ethical standards self-assessment survey

[Sample letter - in our experience, the response is best when this letter is sent out with a covering letter by the Chief Executive]

To Members and officers

Setting high ethical standards

The Audit Commission is working with Wirral Council to assess its arrangements for ensuring and promoting a positive ethical environment. **I am writing to invite you to complete an on-line survey which is the starting point for this work.** The survey asks members and officers for their views on the ethical governance arrangements in your council and explores awareness of Part III of the Local Government Act 2000 - which for example, introduced the members' code of conduct and standards committees.

High ethical standards are of benefit to the Council. They are an integral part of strong corporate governance; they can lead to increased confidence in local democracy and local services and can help the authority to attain high corporate assessment and use of resources ratings. Ethical governance is also included in the Audit Commission's Comprehensive Performance Assessment and Use of Resources work. Findings from our work will be used to identify any improvements that can be made in your council.

The survey will take approximately ten minutes to complete. Please click on (link to be provided) to access the survey. Please complete the survey by (date to be inserted). For technical reasons we regret the survey cannot be accessed directly from a 'Blackberry'.

We will share anonymised survey results with your council. Your individual response will be confidential to the AC and we will not identify your responses to your organisation. Under the Data Protection Act, we have a legal duty to protect any information collected from audited and inspected bodies. Only the minimum appropriate personal data is requested and held, and it is only kept for so long as the purpose requires. We will not provide any personal information obtained by us to other companies or individuals without people's consent unless required to by law.

Should you have any queries or concerns about this work please do contact me at da-brown@audit-commission.gov.uk (07771 943375).

Appendix 3: Audit Part (1) SNAP survey - draft letter

Thank you for taking the time to complete the survey.

Yours sincerely

David Brown
Performance Specialist

Please complete the survey on line by [date] or send your completed paper copy in the enclosed envelope to David Brown at:

Audit Commission
Aspinall Close
Middlebrook
Horwich
Bolton
BL6 6QQ

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Appendix 4 – Member and officer survey questions

- Members abide by the members' code of conduct
- Members make allegations of member misconduct appropriately
- Members make allegations of member misconduct without fear of reprisal
- Officers make allegations of member misconduct appropriately
- I can make an allegation of member misconduct without fear of reprisal
- I can make an allegation of officer misconduct without fear of reprisal
- Members use the Council's resources for party political purposes
- Members perform their duties with honesty, integrity, impartiality and objectivity
- Members listen to the advice of officers
- Members uphold the impartiality of officers
- Officers use the Council's resources appropriately
- Officers perform their duties with honesty, integrity, impartiality and objectivity
- Members trust each other
- Officers trust each other
- Members and officers trust each other
- Bullying by members is not tolerated in the Council
- Bullying by officers is not tolerated in the Council
- Members work well together to achieve the Council's common goals
- Members and officers work well together to achieve the Council's common goals
- Officers work well together to achieve the Council's common goals
- The Council works well with voluntary and community groups to achieve the area's common goals
- The Council works well with statutory partners to achieve the area's common goals
- Appropriate confidences are kept by members
- Appropriate confidences are kept by officers
- I have agreed to abide by my Council's member code of conduct
- This Council has a Standards Committee

Appendix 4 – Member and officer survey questions

- The work of the Standards Committee adds value to the Council
- I understand the role of the Standards Committee
- The Standards Committee is making a positive difference to the way people outside the Council view the organisation
- The Standards Committee is impartial
- Members are provided with appropriate advice on ethics and standards
- Officers are provided with appropriate advice on ethics and standards
- The Standards Committee or monitoring officer monitors member behaviour against the members' code of conduct
- Guidance on ethics and conduct is included in the induction of new members
- Training on ethics and conduct issues is mandatory for members
- Guidance on ethics and conduct is included in the induction of officers
- The organisations' values are communicated to members (via for example, training, meetings, news letters, the local media and the Council's website)
- The organisations' values are communicated to officers
- The organisations' values are communicated to local communities
- The organisations' values are communicated to local partnerships
- The importance of high ethical standards is communicated to members (via for example, training, meetings, newsletters, the local media and the Council website)
- The importance of high ethical standards is communicated to officers
- The importance of high ethical standards is communicated to local communities
- The importance of high ethical standards is communicated to local partnerships
- The Council seeks to meet the needs of its diverse communities
- The Council seeks to attract officers from diverse backgrounds
- The Council ensures that staff are appropriately skilled to meet the needs of its diverse communities
- Members are a focus for positive change
- Members treat users of Council services fairly
- Members treat other members fairly
- Members treat officers fairly
- Officers treat users of Council services fairly
- Officers treat members fairly
- Officers treat other officers fairly

Appendix 4 – Member and officer survey questions

- Appropriate guidance is provided for members on equalities and human rights issues
- Appropriate guidance is provided for officers on equalities and human rights issues
- The Leader of the Council is a positive role model in terms of ethical behaviour
- The Leader of the Council promotes the importance of the ethical agenda
- The Chief Executive is a positive role model in terms of ethical behaviour
- The Chief Executive promotes the importance of the ethical agenda
- The Council's leadership values the role of the Monitoring Officer
- The Monitoring Officer is actively supported by the Chief Executive
- The Council's Monitoring Officer is able to carry out her/his role appropriately
- The Monitoring Officer promotes the ethical agenda
- The Council's approach to promoting high ethical standards is encouraging appropriate behaviour across the Council
- The Council's approach to promoting high ethical standards is helping to build public confidence in the Council
- The public can access the members' code of conduct
- The public can access the officers' code of conduct
- The public can access documents relating to the standards committee (for example, agendas, minutes, background papers)
- Council policies on the use of its resources by members (for example use of telephone, IT etc) are clear
- Council policies on the use of its resources by officers (for example use of telephone, IT etc) are clear
- Communication between members is open
- Communication between members is constructive
- Communication between members and officers is open
- Communication between members and officers is constructive
- Communication between officers is open
- Communication between officers is constructive
- There is a culture in the Council which allows members to challenge Council decisions without fear of reprisal
- There is a culture in the Council which allows officers to challenge member recommendations without fear of reprisal
- There is a culture in the Council which allows partners to challenge Council decisions without fear of reprisal

Appendix 4 – Member and officer survey questions

- There is a culture in the Council which allows the public to challenge decisions without fear of reprisal
- Members respond positively to constructive external criticism about the Council
- Officers respond positively to constructive external criticism about the Council
- The public can access the Council's complaints policy
- The Council's complaints system is clear
- The Council has arrangements for dealing with complaints from the public about services provided in partnership
- Members take complaints from the public seriously
- Officers take complaints from the public seriously
- The Council's whistle blowing policy is clear
- The public can access the whistle blowing policy
- The Council's whistle blowing policy is used appropriately
- The Council's whistle blowing policy is used without fear of reprisal
- The public can access the register of member interests
- The guidelines for members on their personal conduct are clear
- The guidelines for officers on their personal conduct are clear
- Members feel able to challenge other members' inappropriate behaviour
- Members feel able challenge officers' inappropriate behaviour
- Officers feel able to challenge members' inappropriate behaviour
- Officers feel able to challenge other officers' inappropriate behaviour
- The process to report inappropriate member behaviour is clear
- The process to report inappropriate officer behaviour is clear
- Members who behave inappropriately are suitably dealt with
- Officers who behave inappropriately are suitably dealt with
- The Council learns from other councils to ensure that its ethical arrangements are appropriate

Appendix 5: Audit Part (1)

Monitoring Officer's questionnaire

ETHICAL GOVERNANCE TOOL - ISSUES	ANSWERS
<p>1. Balancing rules and trust (MO's questions)</p> <p>Supporting the genuine motivation of people whilst continuing to ensure that those who do breach the rules are discouraged is a key issue.</p>	
<p>1.1</p> <p>Has the member code of conduct been tailored to local circumstances? If yes, how has the model code been changed? Has the Standards Board for England been informed of any changes to the model code?</p>	
<p>1.2</p> <p>How far has the Council integrated the requirements of the code into its policies or schemes, including obligations under the Anti-Discrimination, Human Rights and the Freedom of Information Acts?</p>	
<p>1.3</p> <p>Is there any evidence that members inappropriately use Council resources for political or other purposes?</p>	
<p>1.4</p> <p>Is there any evidence that members ever do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the authority?</p>	
<p>1.5</p> <p>How far do members take officer advice into consideration when they</p>	

Appendix 4 – Member and officer survey questions

ETHICAL GOVERNANCE TOOL - ISSUES	ANSWERS
<p>1. Balancing rules and trust (MO's questions)</p> <p>Supporting the genuine motivation of people whilst continuing to ensure that those who do breach the rules are discouraged is a key issue.</p>	
make decisions?	
1.6	<p>Does the Council have an anti-bullying policy? How is information about this policy disseminated?</p>
1.7	<p>Is there any evidence of bullying by members of other members or of officers, or bullying by officers of members?</p>
1.8	<p>What is the Council's policy on the use of confidential information? Provide external elink if appropriate. Is there any evidence that councillor ever break confidences?</p>
1.9	<p>How many allegations of breaches of the Code have you received for investigation from the authority's standards committee in the last year?</p> <p>How many allegations of breaches of the Code did you received for investigation from the Standards Board during the previous year?</p> <p>Of the cases received in the last year how many:</p> <ul style="list-style-type: none"> ● are outstanding; ● have been investigated and a report completed concluding that there has been a failure to comply with the Code of Conduct; ● have been investigated and a report completed concluding that there has not been a failure to comply with the Code of

Appendix 4 – Member and officer survey questions

	<p>Conduct;</p> <ul style="list-style-type: none">• have been referred to the Standards Board for England for investigation by an ethical standards officer? <p>What is the nature of the behaviours complained of?</p>	
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Appendix 4 – Member and officer survey questions

ISSUES	ANSWERS
<p>2. Independent overview (MO's questions)</p> <p>Monitoring, developing and promoting the Council's approach to the ethical agenda delivers improvement in this area.</p>	
<p>2.1</p>	<p>What is the membership of the Standards Committee?</p> <p>How many members are there overall? How many are councillors (which parties), independent members and parish or town councillors?</p>
<p>2.2</p>	<p>How were independent members appointed or selected?</p> <p>How far were the Council's recruitment procedures for senior staff adhered to?</p> <p>In some councils most independent members come from the same professional background. How far does this apply in your Council?</p>
<p>2.3</p>	<p>What training, guidance or support have independent members of the Standards Committee received to familiarise themselves with local government and the Council?</p>
<p>2.4</p>	<p>What are the terms of reference of the Standards Committee?</p> <p>Do the terms of reference include:</p> <ul style="list-style-type: none"> ● advising on adopting a local code which sets out the standards of conduct expected from members? ● promoting and maintaining high standards of conduct within the Council through assistance, advice and training? ● promoting the requirements of the code of conduct outside the Council and helping the public, external stakeholders and partners to understand the required standards of behaviour of

Appendix 4 – Member and officer survey questions

ISSUES	ANSWERS
<p>2. Independent overview (MO's questions)</p> <p>Monitoring, developing and promoting the Council's approach to the ethical agenda delivers improvement in this area.</p>	
<p>members?</p> <ul style="list-style-type: none"> ● monitoring the operation of the members' code of conduct? 	
2.5	<p>What does the Standards Committee do to promote the requirements of the code of conduct inside and outside the Council and help the public, external stakeholders and partners to understand the required standards of member behaviour?</p>
2.6	<p>Has the Standards Committee undertaken an assessment of the standards of conduct in the Council? If so, what were the key findings? What has changed because of the assessment?</p>
2.7	<p>How does the Standards Committee use findings, including from the allegations it receives, the authority's own investigations, the Standards Board for England, internal and external audit, the local government ombudsman, complaints, whistle-blowing and so on to plan its work?</p>
2.8	<p>What does the Standards Committee do to publicise guidance produced by the Standards Board for England</p>
	<p>What does the Standards Committee do to publish case rulings?</p>
2.9	<p>Has the Standards Committee undertaken an assessment of the impact of its work inside the Council? And outside the Council? If so, what were the key findings? What has changed because of the assessments?</p>

Appendix 4 – Member and officer survey questions

2.10	<p>How regularly are the following reviewed, including terms of reference:</p> <ul style="list-style-type: none"> ● operation of the constitution; ● members' code of conduct; ● officers' code of conduct; ● member/officer protocol ● register of interests; ● the Standards Committee; and ● other ethical protocols. <p>What changes have been made because of these reviews?</p>	
2.11	<p>What training, guidance and information have members received on the members' code of conduct? In your view is the training adequate? What percentage of the target group attended the last training?</p>	
2.12	<p>What training, guidance and information have officers received on the code? In your view is the training adequate?</p>	
2.13	<p>Does the Standards Committee have proper processes for: receiving and assessing allegations, carrying out reviews, holding determination hearings?</p> <p>Has the Council assessed the potential risks in this whole process and how it will mitigate them?</p>	

Appendix 4 – Member and officer survey questions

3. Leadership (MO's questions) Encouraging good conduct in the Council is the responsibility of the Council's leadership and of all members and officers.		
3.1	What evidence do you have that members and officers understand their respective roles?	
3.2	How far do members involve themselves in operational issues?	
3.3	What guidance is provided for members and officers on equality laws, human rights and freedom of information legislation?	
3.4	Do you have easy access to the Chief Executive on ethical and other relevant issues?	
3.5	Does the Standards Committee have easy access to the Chief Executive on ethical and other relevant issues?	
3.6	What role does the Chief Executive have in ensuring that the code of conduct is observed and that good ethical behaviour is promoted?	
3.7	How do you ensure your role is valued by the Council's leadership?	
3.8	Are you part of the senior management team?	
3.9	What advice, support and information do you provide to the Standards Committee?	
	What percentage of Standards Committee meetings have you attended in the last year?	
3.10	How is the importance of high ethical standards communicated to member and officers and to the local community by the Council?	

Appendix 4 – Member and officer survey questions

4. Transparency (MO's questions) Ensuring transparency in the way the Council carries out its business is a key component of ethical governance.		
4.1	How is information on the Council's access to information policy disseminated to members, officers and the public?	
4.2	How easily can the public find and then access Standards Committee documents: <ul style="list-style-type: none"> ● terms of reference; ● meeting schedule; ● agendas/minutes; ● reports/papers/plans; and ● background papers ● case findings 	
4.3	Where are copies of the members' code of conduct available for inspection by the public? When and where did the Council publicise that the 2007 code has been adopted and that it is available for inspection?	
4.4	Does the Standards Committee have a publicly available annual/forward plan based on the ethical issues facing the Council?	
4.5	Does the Standards Committee report at least once a year to the full Council on the ethical agenda and the work of the Standards Committee?	
4.6	Is the council responding to the Standards Board for England's quarterly and annual requests for information in a timely and appropriate manner?	
4.7	What are the Council's protocols for member use of: <ul style="list-style-type: none"> ● Council premises; ● information technology (including 	

<p>4. Transparency (MO's questions)</p> <p>Ensuring transparency in the way the Council carries out its business is a key component of ethical governance.</p>		
	<p>the use of equipment at home);</p> <ul style="list-style-type: none"> ● telephone and fax; ● photocopying; ● stationery and headed writing paper; ● postage; ● authority transport; and ● allowances and expenses. 	
4.7	How are member declarations of interest recorded and adherence monitored?	
4.9	How does the Council help members understand the difference between personal and prejudicial interests?	
4.10	<p>How is the register of interests made open to public scrutiny?</p> <p>How is the register of interests monitored and kept up to date?</p> <p>Does the register of interests require all members, including co-opted and appointed members on panels and committees, to record all the required information?</p>	
4.11	<p>How does the Council help members of overview and scrutiny and other Council committees and panels to understand this issue?</p> <p>How does the Council make it clear to members that a dispensation can be sought, allowing them to take part in meetings where they have a prejudicial interest?</p> <p>Have there ever been any allegations of impropriety with regard to the declarations of interests? If so please explain.</p>	
4.12	How are member interests declared and logged at meetings?	
4.13	How far does the Council listen to and	

Appendix 4 – Member and officer survey questions

4. Transparency (MO's questions) Ensuring transparency in the way the Council carries out its business is a key component of ethical governance.		
	learn from constructive challenge, either internally or externally, from the public or from official bodies?	
4.14	<p>How easily can the public find and then access the Council's complaints/whistle blowing policies?</p> <p>How is information about these policies disseminated?</p> <p>How effective are they at addressing the ethical governance issues that arise?</p> <p>How far do whistle blowers/complainants have the protection of the Chief Executive?</p>	
4.15	How do you ensure that members comply with the code of conduct?	
4.16	What procedures are there for the Chief Executive to intervene verbally or in writing if ethical issues arise in the Council?	
4.17	What procedures are there for the Monitoring Officer to intervene verbally or in writing if ethical issues arise in the Council?	