

Hillingdon Council

Local Code of Corporate Governance

1. Governance Framework

Governance at the Council ensures that activities are conducted in a timely, inclusive, open, honest, and accountable manner. It involves systems, processes, cultures, and values that direct and control the Council, engaging with and leading the local community.

The Leader of the Council and Chief Executive are key custodians of governance, but all Councillors and Officers share this responsibility. The Council follows the CIPFA/SOLACE framework for Corporate Governance in Local Government (April 2016) and adheres to seven principles of good governance through a Local Code of Corporate Governance. The seven principles are shown in the diagram below.



This Local Code outlines the Council's commitment to governance and is reviewed annually by the Corporate Governance Group – the Council's internal officer group, established by the Chief Executive and chaired by the Monitoring Officer, charged with ensuring good governance within the Council. The framework includes:

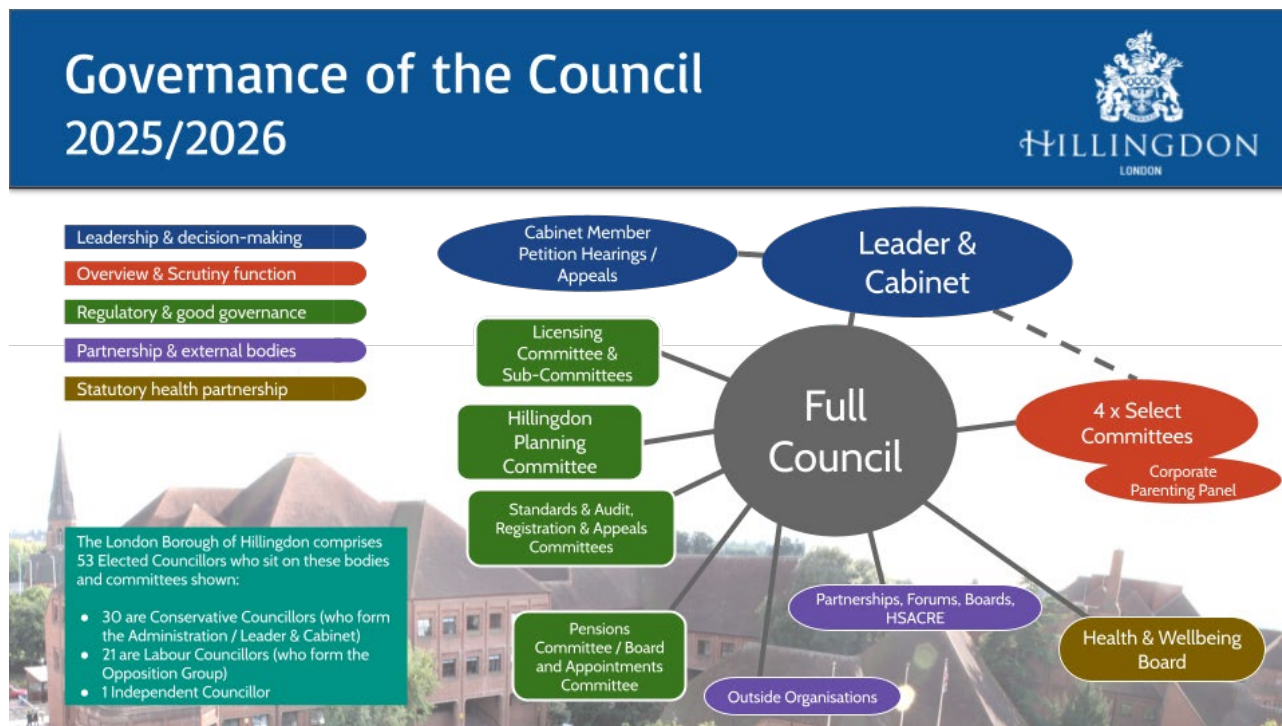
- Adherence to the CIPFA/SOLACE principles.
- A regularly reviewed Local Code of Corporate Governance.
- An internal control system to manage risk.
- An annual review of governance effectiveness and preparation of an Annual Governance Statement.
- Robust democratic governance, strong internal corporate governance bodies and statutory officers, and effective partnership governance arrangements.

The bodies and individuals responsible for and engaged in good governance include those both in the democratic environment, as well as internally at officer level. Both are aligned to the way the Council operates.

The diagrams below show both democratic governance and internal corporate governance arrangements:

Democratic governance

The Full Council acts on recommendations from the Audit Committee regarding the Local Code of Corporate Governance and reports annually on its work. The Leader and the Cabinet hold ultimate executive responsibility and accountability. The Audit Committee independently reviews the effectiveness of corporate governance arrangements, makes recommendations, supports assurance on the Annual Governance Statement, and ensures the risk management framework is effective. Select Committees provide robust scrutiny and accountability of the Cabinet and external partners. Standards Committee ensures integrity in public office.



Internal Corporate Governance

The Head of Paid Service, Monitoring Officer, and s151 Officer are the Council's three 'statutory officers' and their roles and responsibilities are set out in the Constitution. In summary:

- The Head of Paid Service is responsible for overseeing the authority's overall administrative and staffing functions. The Head of Paid Service ensures the integration of functions across departments, making sure the organisation operates efficiently. This role also bridges the gap between the authority's Officers and elected Members.
- The Chief Finance Officer, also known as the Section 151 Officer, ensures the proper administration of the authority's financial affairs. This Officer must ensure that budgets are adhered to and must report if unlawful expenditure or financial mismanagement is likely.
- The Monitoring Officer is tasked with ensuring the lawfulness of the authority's actions. This includes compliance with the authority's Constitution, maintaining high standards of conduct, and intervening when there are breaches of the law. The Monitoring Officer plays a key role in ethical governance and ensuring that elected Members and Officers operate within the law.

Internal governance, including financial governance, is reviewed regularly through the Corporate Governance Group, sponsored by the Chief Executive. Other strategic groups, and ultimately the Corporate Management Team (CMT) are in operation to ensure due diligence and robust internal governance prior to any democratic decisions. To aid this, the Council actively plans and tracks key business from conception to decision, in conjunction with CMT and Democratic Services. Directorate Senior Management Teams (SMTs), Service Meetings, and 121 Meetings allow officers to regularly review internal service governance and raise concerns if needed.

Partnership governance

The Council has both formal and informal partnerships arrangements and is well connected with a wide range of local, regional and national external bodies. In addition, Councillors are either appointed to or are members in their own right, of a variety of local charities, organisations and business groups which helps ensure strong links and communications. When appointed by the Council, Members are expected to be open and transparent

about their activities to ensure public accountability. Select Committees proactively undertake their statutory health and crime and disorder partnership scrutiny responsibilities with senior representatives of partner organisations attending regularly and being held to account, coupled with strategic health governance via the Health and Wellbeing Board. The Council has formal agreements for the provision of crematorium and mortuary services with two other London boroughs. The Council has created company entities for the efficient delivery of services, including Hillingdon First Ltd for housing and land acquisitions and The Hillingdon Care Company, for adult care services.

2. Applying the Principles of Good Governance

To achieve and maintain good governance, the Council will seek to apply each of the seven principles of good governance referred to above in the following way, representing recommended best practice:

A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.	
Council Strategy	✓ Our vision and priority commitments underpin everything the Council does, including how it makes decisions, serves communities, works with partners, and facilitates our ambitions for residents.
Constitution	✓ Hillingdon Council's governance structure, decision-making processes and areas of responsibility are covered in the Council's Constitution and Schemes of Delegation.
Committee Standing Orders	✓ Committee Standing Orders, Procurement & Contract Standing Orders & Scheme of Delegation to Officers are incorporated in the Constitution and reviewed annually.
Codes of Conduct	✓ The Member and Co-opted Member Code governs the behaviour and actions of all Council Members and co-opted members and requires that any allegations of misconduct are investigated. There is a separate 'Code of Conduct for Employees', which applies to all Council officers and is part of their contract of employment.
Standards Committee	✓ The Council's Standards Committee sits outside of the Cabinet and reports directly to Full Council. It promotes and maintains high standards of conduct across the Council and oversees the respective Codes of Conduct which apply to both Councillors and Officers. The Standards framework includes a 'Whips Protocol' for use in the first instance when considering allegations of breaches of the Member Code of Conduct. Complaints are only escalated to the Monitoring Officer and Standards Committee if they cannot be resolved through this process.
Counter Fraud Strategic Plan	✓ The Council sets out its approach in relation to fraud and corruption in the Council's Counter Fraud Strategic Plan . This is underpinned by the Fraud Risk Register and a full range of investigative policies and procedures.
Whistleblowing Policy	✓ This policy sets out how the Council complies with the Public Interest Disclosure Act 1998, allows Council staff, contractors and residents to raise complaints regarding any behaviour or activity connected to the authority, ranging from unlawful conduct to fraud or corruption.
Member Register of Interests	✓ The Register (detailed on the website on each individual Councillor's page) records the pecuniary and non-pecuniary interests of Members and co-opted members of Hillingdon Council. There is a separate 'Related Parties' register that all Members and a selection of senior officers are required to complete each year. ✓ Guidance is in place regarding the acceptance of Gifts and Hospitality by both members and officers, detailed in the Gifts and Hospitality Policy.
Legal & Regulatory Powers	✓ There are measures to address breaches of its legal and regulatory powers. The Council's Monitoring Officer has statutory reporting duties in respect of unlawful decision making and maladministration.
B. Ensuring openness and comprehensive stakeholder engagement	
Council's Website	✓ The Council's website continues to improve functionality and content for residents and visitors and is set out in a clear and easily accessible way using plain language. The information which residents use most, such as Council Tax, and Waste and Recycling can be accessed easily from the main page. There is increasing use of AI and automation to improve sign-posting and relevant of online information to residents.
Council and Committee Meetings	✓ All Council and Committee meetings are held in public (other than limited circumstances where consideration of confidential or exempt information means that the public are excluded), with agenda and reports available on the Council's website. Key Council meetings are also broadcast live on YouTube .

Consultation/ Engagement Standards	✓ These standards demonstrate and support the Council's commitment to transparency, to engage, consult and respond to the views of local communities, and to build strong relationships with residents, visitors, and businesses. All feedback supports and informs the Council's corporate intelligence, which drives business planning, policy, decision-making including commissioning and procurement.
Council's Select Committees	✓ The Council's well-established overview and scrutiny arrangements comprises Select Committees which engage local stakeholder and expert witness participation in their reviews, to deliver added value findings to Cabinet. Exercising its statutory Health and Crime & Disorder responsibilities, the Health and Social Care and Residents' Services Select Committees regularly scrutinises the work of the local NHS, Safer Hillingdon Partnership and other public agencies with their most senior representatives attending. Corporate parenting responsibilities have been integrated within the Council's overview and scrutiny arrangements to provide stronger oversight and directly engage children in care and care leavers. Meetings are co-chaired by Children representatives.
Hillingdon Foster Carers	✓ Regular virtual and face to face meetings take place between the Hillingdon Foster Carers and the Corporate Director of Children's Services and relevant Heads of Service, to discuss and consult on issues pertinent to our Hillingdon foster carers who are corporate parents for our most vulnerable children.
Tenant and Resident Associations	✓ There are well established Tenant and Resident Associations in the Borough as well as Council tenant forum groups (e.g. sheltered housing forum) which provide valuable opportunities to discuss important service developments and to receive and listen to resident feedback. The Council is now in the process of bringing forward a new Tenant & Leaseholder Engagement & Empowerment Strategy which will reshape its approach to hearing and acting upon the voice of its tenants and leaseholders.
Petition Scheme	✓ The Council operates a well-established Petition Scheme , including for e-Petitions, which is widely used by residents in the borough to submit their views on local matters directly to decision-makers.
Joint Strategic Needs Assessment	✓ The Joint Strategic Needs Assessment (JSNA) is continuously updated to outline the current and future health and wellbeing needs of the population over 3 to 5 years. It informs the Council's service planning, commissioning strategies and links to strategic plans such as LBH's Joint Local Health and Wellbeing Strategy.
Hillingdon Youth Council	✓ HYC is a youth-led forum where young people can discuss community issues, influence decision-making, and engage in meaningful projects. While the core group is elected annually from Hillingdon schools, the council remains open to all young people who wish to get involved. HYC collaborates with the UK Youth Parliament and London Youth Assembly, taking part in various youth-led initiatives, including project work, consultations, and campaigns that promote cultural understanding and community engagement
Children in Care Council	✓ "These forums enable children in care and care experienced young people to make a difference and improve services and outcomes for children and young people. The forums provide young people a space to express their thoughts and feelings on their involvement in services. Young people regularly meet with senior leaders in children's services and attend councillor led meeting (corporate parenting panel) to discuss changes we would like to make to practices and procedures which are affecting them."
Youth Voice	✓ This monthly forum enables young people involved with children's services an opportunity to make a difference and improve services and outcomes for children and young people. The forum provides young people a space to express their thoughts and feelings on their involvement in services. Young people regularly meet with senior leaders in children's services
Older People's and Disabled People's Assemblies	✓ This forum invites residents to voice their opinion on the services for older people and disabled people in Hillingdon. There are different speakers at each meeting covering a wide range of topics of interest.

C. Defining outcomes in terms of sustainable economic, social and environmental benefits	
Performance Management Framework	✓ Services in the council set and monitor their own targets to ensure service delivery against statutory compliance where applicable. This are normally benchmarked vs other councils to further improve service delivery as well as reviewing best practise. Key aspects of performance are monitored on a regular basis through a combination of reporting and live dashboards. this is an area that is being actively developed as the more recent the data the more reactive we can be for the resident.
Medium-Term Financial Strategy	✓ The Medium-Term Financial Strategy (MTFS) is the Council's key process for service and corporate financial planning, providing a forward view of the Council's financial position over the forthcoming five years and a framework to develop savings proposals to manage emerging budget gaps. This follows an annual cycle from initial scoping in February/ March through a robust challenge process involving both Senior Managers and Members to deliver a consultation budget before Council Tax setting for the subsequent financial year. ✓ An annual budget consultation report is also produced for each Select Committee for discussion with any comments added to the final budget report for Cabinet/Council approval. In-year, select committees undertake robust budget scrutiny. ✓ The Council also undertakes the statutory budget consultation process with business ratepayers and residents in the Borough across December and January with the responses included as an appendix to the final budget report. Throughout this process updates are communicated through key officer forums, such as CMT and Business Transformation Board.
Health and Wellbeing Board	✓ The Health and Wellbeing Board seeks to improve the quality of life of the local population and provide high-level collaboration between Hillingdon Council, the NHS and other agencies to develop and oversee the strategy and commissioning of local health and social care services. The Board is co-chaired by the relevant Cabinet Member and the Managing Director, Hillingdon Health and Care Partners
Safer Hillingdon Partnership (SHP)	✓ The SHP is the statutory Community Safety Partnership for the borough established under the Crime and Disorder Act 1998, the Police and Justice Act 2006 and Police and Crime Act 2009. The SHP has a duty to conduct an annual strategic assessment of community safety trends and agree key community safety priorities for implementation across the partnership. The Residents Services Select Committee undertake the statutory oversight of the SHP.
Hillingdon Housing Strategy	✓ This Hillingdon Housing Strategy 2021 – 2026 identifies key challenges and sets out our key aims and priorities for housing over the next five years. The council has responsibilities for housing both as a landlord and in relation to its strategic housing role. This includes assessing needs, identifying priorities and planning for the delivery of affordable housing; standards of housing and management across both the social sector and the private rented sector; homelessness and housing advice; housing support and aids and adaptations. It takes account national policy and legislation and the London Housing Strategy 2018: Homes for London.
Public Sector Equality Duty	✓ The Council is on track to achieve its equality-related objectives as part of the Council's Public Sector Equality Duty set out in the Equality Act 2010.
D. Determining the interventions necessary to optimise the achievement of the intended outcomes	
Constitution	✓ The Constitution sets out how the authority operates, how decisions are made, and the procedures that are followed to ensure that they are efficient, transparent and accountable to local people. ✓ The Constitution also sets out the Cabinet and Officer Scheme of Delegations which govern the allocation of responsibilities and the discharge of executive functions by the Leader, the Cabinet, individual Cabinet Members and officers to perform the authority's activities. This is regularly updated to reflect changes to Cabinet Member portfolios and to reflect changes to Corporate Directors' responsibilities in line with business priorities.
Business Performance	✓ Decision makers receive accurate, relevant and timely performance and intelligence to support objective and analysis of options, financial impact and associated risks informing service delivery. ✓ The effectiveness of the Council's interventions and the quality of its services is monitored through the provision of regular performance reports showing progress towards goals and targets set in the budget and business plans. ✓ Annual performance reports are scheduled to Cabinet and select committees for monitoring purposes.

E. Developing the entity's capacity, including the capability of its leadership and the individuals within it	
Member Training	✓ Elected Members are trained and briefed on a wide range of topics, with mandatory training on planning and licensing duties and the Code of Conduct. Regular seminars and briefings are held which include an annual Member Development Day.
Training and Development Programme	✓ Council staff are required to complete a range of learning through the internal intranet. Training includes induction programmes, e-learning packages and vocational development courses under the Qualifications and Credit Framework. Digital and AI training is undertaken across the Council.
Performance Appraisal	✓ A new Performance and Development Appraisal process was introduced for 2023/24 and requires all staff to record employees' key objectives and tasks, set targets for when these must be delivered and identify staff learning and development needs. Performance reviews are required to be completed on a bi-annual basis against the relevant competency framework.
Digital Excellence Academy	✓ The Digital Excellence Academy has been formed to ensure staff have the skills and capabilities to use technology to its fullest extent. Featuring a blended approach, the programme provides self paced learning, webinars, and formal level 3 to level 5 apprenticeship training on subjects such as Leadership in AI and Data literacy for improving insight and business decisions.
Wellbeing	✓ The Council is committed to promoting the physical and mental health and wellbeing of the workforce through specific interventions and as a central part of the role of all managers. There is a dedicated programme with a range of support and guidance for employees and their managers covering mental health in the workplace, wellbeing initiatives and a 24/7 Employee Assistance Programme.
F. Managing risks and performance through robust internal control and strong public financial management	
Risk Management Framework	✓ The Council has processes in place to identify and manage risks to the achievement of its objectives, as set out in the Risk Management Policy. The Corporate Risk Register is a part of this framework and is used to inform decision making, provide assurance over actions being taken to manage key risks, and to inform risk management planning and mitigation activities.
Insurance	✓ The Council's insurance contracts support the transfer of financial risk through a mixed portfolio of suppliers specialising in specific insurance sectors.
Health and Safety	✓ The Council's health and safety management system assists in managing health and safety incidents and integrating health and safety risk assessments into daily business.
Counter Fraud	✓ Hillingdon Council maintains policies and arrangements to effectively manage both the internal and external risks of fraud and corruption against the Council. These include the Counter Fraud Strategic Plan, Whistleblowing, Anti Money Laundering and Anti Bribery Policies.
Expenditure Controls	✓ Robust expenditure controls in place to facilitate compliance with Standing Orders and financial regulations. This includes a comprehensive capital release process for the approved MTFF Capital Programme and wider expenditure control processes. ✓ An established, rigorous process for developing the budget through the Medium Term Financial Forecast (MTFF) process. This includes close alignment with the service planning process and the Transformation Programme, with the overall approach to managing the Council's finances within the framework established in CIPFA's Financial Management Code
Managing data	✓ Personal data is processed in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. GDPR training forms part of the mandatory induction process and refresher e-learning training was rolled out to all staff in March 2022. ✓ The Hillingdon Information Assurance Group (HIAG), chaired by the Senior Information Risk Owner, meets quarterly to review updated information governance policies, procedures, assess the Council's effectiveness in complying with data protection and information security legislation, and to mitigate organisation-wide information governance risks. Individual data protection incidents are reviewed to ensure that appropriate action is taken to reduce the impact of the event and likelihood and recurrence, with any learning requirements identified and addressed.
Caldicott Guardian	✓ The Corporate Director for Adult Social Care & Health and the Corporate Director for Children's Services are the jointly appointed Caldicott Guardian and play a key role in ensuring the highest practical standards for handling person identifiable information and embedding the principles within practice.

Data Security	✓ The Council is compliant with the Data Security and Protection Toolkit requirements in order to access systems and data provided by the NHS, and meet the requirements of the Public Services Network (PSN) by ensuring our ICT Infrastructure is secure. The PSN enables specific teams across the Council to directly access Government data which includes high risk data about individuals, such as social care issues.
Emergency Planning & Resilience	✓ Hillingdon Council maintains governance arrangements to support its statutory duties under the Civil Contingencies Act 2004. This includes a dedicated Emergency Management and Response Service, a Corporate Emergency Response Plan, and oversight through the Emergency Planning Board chaired by the Chief Executive. These arrangements ensure the Council can respond to and recover from emergencies.
Business Continuity Plans	✓ All services within the authority are obliged to maintain business continuity plans and to review those plans on an annual basis to ensure essential services are able to be maintained. The plans are to be approved by a senior manager who are ultimately responsible for their implementation.
G. Implementing good practices in transparency, reporting and audit to deliver effective accountability	
Transparency and Publishing of Finance Data	✓ The Council follows the Local Government Transparency Code 2015, which includes requirements and recommendations for local authorities to publish certain types of data. In accordance with this code, financial information about projected and actual income and expenditure, procurement, contracts and financial audit is published on the Council's website.
Privacy Notices	✓ The Council has published Privacy Notices, which are transparency requirements under the GDPR as individuals have the right to be informed about the collection, type and use of their personal data. ✓ Information is made available to the public via the information access regimes provided for by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. Individuals may access their own personal data by exercising the right of subject access under the Data Protection Act 2018.
Internal Audit & Audit Committee	✓ An assessment of the overall effectiveness of the framework of governance, risk management and control is provided by the Council's Internal Audit service in the Head of Internal Audit's Annual Opinion. ✓ An Independently Chaired Audit Committee operates to oversee financial reporting, provide scrutiny of the financial and non-financial systems, and provide assurance on the effectiveness of risk management procedures and the control environment.
Scrutiny via Select Committees	✓ Select Committees undertake regular monitoring of services, performance, the budget and an annual programme of Member-led service reviews involving witness testimony aimed at influencing Executive policy. Statutory scrutiny of health and police bodies is undertaken annually. Regulatory decisions on planning, licensing and related matters are undertaken judiciously by experienced and trained elected Councillors, in accordance with the Council's ethical standards.