

**Ethical Standards for Providers of Public Services
Self-Assessment**

Measures	Ethical Expectations	WDC current position (Jan 2016)	Action Points?
<p>Evidence of leadership commitment to ethical standards - What is the tone from the top and how is this lived out throughout the organisation? What are the values and behaviours this organisation is encouraging and discouraging?</p>	<p>Public statements and day-to-day behaviour that demonstrate visible commitment to ethical standards and taking responsibility – being publicly accountable – for ethical standards.</p>	<p>We are a public body and operate in a transparent way in line with government requirements. Decisions are taken having regard to ethical standards in line with our Corporate Plan and core values.</p> <p>The Council has chosen to retain a separate Standards Committee as part of its public statement of its commitment to maintaining high ethical standards. The Committee has shown itself to be highly supportive of on-going training.</p> <p>Clear and up-to-date policies and processes are in place to deal with Member and officer code of conduct issues.</p> <p>New starters (Officers) have to read the Code of Conduct as part of their induction.</p> <p>Both Standards Committee and Audit Committee will be involved in reviewing this self-assessment.</p>	<p>A summary of the training provided to the Standards Committee could be included in Members' Update.</p>

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	<p>In a small organisation this could be as simple as telling all staff about the ethical expectations of those in the organisation delivering public services.</p>	<p>Core values have been communicated and promoted to all staff during 2015. Induction course includes coverage of ethical expectations of working for, and representing, the Council.</p> <p>Both Member and Officer codes of conduct are incorporated into the Constitution.</p>	
<p>Evidence of board and individual responsibility for ethical standards - how are employees and (if applicable) board members held to account collectively and individually for ethical issues?</p>	<p>Board level oversight of ethical matters and board level responsibility for or championing of ethical compliance.</p>	<p>Corporate Governance Group notes are submitted for review/approval by Strategic Management Board.</p> <p>Core values refreshed during 2015 and personally promoted by the Chief Executive at staff meetings and in weekly newsletters to staff.</p>	
	<p>Ethics committees can be used as a mechanism to improve and scrutinise ethical decision making but they should be integrated to the governance arrangements and not a "bolt-on".</p>	<p>We have no separate ethics committee. Audit Committee and Standards Committee perform this role for the Council, each with clear terms of reference and reporting lines into the governance of the Council, which are publically available.</p> <p>As noted above, the Council has chosen to retain a separate Standards Committee, evidencing that this is not</p>	

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		viewed as a “bolt-on”.	
	Annual attestations - individual annual sign off of compliance with the company’s Code of Conduct and compliance regulations or policies.	Annual Governance Statement is produced each year and signed by the Leader of the Council and the Chief Executive, following consideration by Audit Committee, and published.	
	Employees are aware of the code of conduct and the consequences of failing to adhere to the Code.	Employees are made aware through the induction process and reminded at regular frequencies, e.g. Review Point.	
Evidence of internal control and accountability measures - what is the internal control environment for maintaining ethical behaviour and standards in the organisation?	A suitable code of conduct - typically a series of Do’s and Don’ts, publically available and adherence to the code monitored.	Clear and up-to-date policies and processes are in place to deal with Member and officer code of conduct issues.	
	Identification of key indicators or measures of an ethical culture within the organisation and periodic reviews of their effectiveness.	Periodic reviews of policies are undertaken and scheduled via Review Point.	
	Existence of and adherence to whistleblowing policy or speak up mechanisms, gifts and hospitality registers, anti-bribery and corruption, declarations of interests requirements, procedures for dealing with conflicts of interest, which are regularly reviewed.	These policies are in place and reviewed on a regular basis with reminders to staff of the requirements. The AAS (Annual Assurance Statement) requires each Head of Service to confirm that staff are aware and reminded on an annual basis, of the systems, processes and procedures	

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		relating to employee’s code of conduct, registration of interests, gifts and hospitality, as well as effective whistle blowing arrangements.	
	Ethical risks captured and controlled in the risk management process and evidence they have been identified, assessed and where required mitigated.	Strategic and operational risk registers in place. We include a potential risk around Member standards, self- certification via the AAS, although ethical risks not explicitly covered.	An article in Members’ Update as regards ethics and use of some external cases where it has gone wrong would be useful.
	Transparency and reporting arrangements which encourages “intelligent accountability” putting out good quality information in intelligible and adaptable formats creating a genuine dialogue with stakeholders.	We have complied and embraced the transparency agenda, with a “Data Share” section on the Council’s website. Annual report on our priorities. Public information on financial accounts, with opportunity to make representations.	More data sets to be made public as required and resources allow.
Evidence of establishing an ethical awareness and capability in recruitment, induction, progression, training and professional development - how is ethical awareness embedded in the organisation?	Recruitment procedures that take account of values and ethics alongside other skills.	All posts have a person specification, as well as a job description, with scoring based on the person specification. Core training for managers on recruitment and selection undertaken November 2015.	
	Induction processes that give new starters an understanding of the	Induction process in place	Continue to strengthen the focus on core values.

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	ethical expectations of them, the Codes of Conduct and ethical framework operating in the organisation.		
	Training and guidance on ethical standards generally through ethical and values based training online and face to face. Self-assessment often web based tools.	Comprehensive training in place at Member and officer level. Member induction process following the May 2015 elections covered standards of conduct in detail. Performance management training has been identified as part of the “Successful Wycombe Manager Development Programme” for April/May 2016.	
	Employees encouraged to demonstrate achievement of e.g. ethical component of commercial capability requirements such as Chartered Institute of Purchasing and Supply’s ethical procurement and supply e-learning module.	Commercial awareness is being developed. Initial workshop held for Strategic Management Board on 8 December 2015.	To be considered as part of roll-out of commercial awareness training.
Evidence of appraisal, promotion and reward procedures that take account of values and ethical behaviour - how does	Codes of conduct linked to performance incentives.	SMB (16/12/15) considered the linking of core values to performance objectives.	To be included in a refreshed scheme from April 2016.
	Assessing staff on behaviour based criteria the “how” as well “what” they	SMB (16/12/15) considered personal objectives to have a greater focus on	To be included in a refreshed scheme from

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the organisation encourage (or not) its intended values and behaviours?	have achieved. Assessing behaviours against core values - e.g. do they role model behaviours consistently, do they coach and encourage others to achieve similar high standards, for leaders do they develop a working culture which emphasises integrity and ethics? Do they champion the company values?	the “how”, not just the “what”.	April 2016.
	Including questions on ethical matters in employee’s surveys.	Relevant questions regarding our core values and ethics are included in our staff surveys, which are undertaken annually.	Full staff survey scheduled for summer 2016.
Evidence of commissioner-provider and user-provider dialogue - what is the success or failure for this contract including the supply chain and what are the essential behaviours to deliver success? How does the organisation learn from criticism and compliments?	Use of staff feedback surveys and self-assessment.	We have introduced in 2015 a contract review framework and annual process. First year’s learning has been reviewed and refinements made for 2016. (CGG 07/12/15)	Undertake the revised annual contract review process for 2016.
	Responding to and acting on feedback.	We have introduced in 2015 a contract review framework and annual process. First year’s learning has been reviewed and refinements made for 2016. (CGG 07/12/15)	Undertake the revised annual contract review process for 2016.
	Robust complaints system and evidence of good complaints handling; the effective use of complaints data to evaluate how well	We have a well embedded corporate complaints system, with a focus on reviewing and identifying service improvements. Quarterly reviews by	Further work is planned during 2016 on capturing service improvements.

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	standards are being achieved and to help deliver service improvements.	Strategic Management Board with public information sheets to Standards Committee and Cabinet.	
	Setting out clear expectations and standards throughout the supply chain, monitoring compliance with them and clear explanation provided as to the consequences of failing to meet the standards expected.	Review of Contract Standing Orders is currently being undertaken – is this aspect being considered?	Consider a defined Supplier Code of Practice that we invite/encourage/mandate our suppliers to demonstrate adherence to, and can be used to consolidate existing rules and requirements?