

Title	Recommendation	Action	By whom	By When
2	<p>The Council's Code of Conduct should clarify and strengthen the provisions in respect of declarations of interest for gifts and payments in kind and for the declaration of related party transactions. Employees need to be clear what needs to be declared, when and to whom.</p>	<p>Code of Conduct, including declarations of interest and gifts and hospitality, revised and updated.</p> <p>Roll out to all staff.</p>	Monitoring Officer	<p>Completed</p> <p>June 2022</p>
3	<p>Training on the Code of Conduct (including the Principles of Public Life) should be compulsory for all staff as part of their induction, and should be refreshed when necessary, potentially on a yearly basis.</p>	<p>Code of Conduct training and supporting materials being developed, including a process to provide an auditable record of completion within the LMS (Learning Management System)</p> <p>Training module to be included in the Mandatory Employee Training Programme for 2022/23</p>	Monitoring Officer	June 2022

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4	The Council's policy on allowing staff and elected members to use Council resources such as (but not limited to) the facilities at the Lufton Depot for their own benefit should be reviewed and strengthened, and the systems for invoicing and recording payment for such work should be similarly reviewed and strengthened	<p>Policy has been reviewed. Staff and Elected Members can now only access services as any other member of the public.</p> <p>All council equipment and assets can only be used for council work.</p> <p>Any staff discounts applicable are transparent in the councils' fees and charges policy 2022/23 and at point of sale.</p>	Director of Strategy, Support Services and Environmental Services	<p>Completed</p> <p>Completed</p>
5	Financial Regulations training should be carried out as part of the induction process and should be refreshed at yearly intervals as a minimum. Appropriate records should be kept on a learning management database.	<p>Learning Management database fully reflects employees group, plus contractors and agency staff.</p> <p>Weekly reconciliation of starters and leavers conducted.</p> <p>Revised Financial Procedure Rules prepared for approval by Audit Committee</p> <p>Mandatory Employee Training on the revised Financial Procedure Rules will be rolled out following approval.</p>	<p>S151 officer and Lead Specialist – Finance</p> <p>S151 Officer</p>	<p>Completed</p> <p>Completed</p> <p>June 2022</p> <p>To start in June 2022</p>

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6	<p>Agency contracts and suppliers should have to go through a procurement process and should be part of a preferred supplier list to ensure that personal relationships and any other connections are declared centrally. The use of agency and contractors at SSDC should be reviewed to ensure that the allocation of funds are in the best interests of the public and the Council.</p>	<p>Standard ITT document checked - Section 3 (3.1 (g) grounds for discretionary exclusion requires suppliers to identify conflicts of interest as defined in Reg 24 PCR Regs 2015.</p> <p>SSDC standard terms and conditions (clause 16) refer to ethical trading and are attached to the Council's RFQ template, but not currently issued on PO's. This is being reviewed by finance.</p> <p>All procurements over £25K are reviewed by the procurement specialist.</p> <p>Procurement specialist has reviewed the councils approach to agency staffing.</p> <p>All agency agreements now collated.</p> <p>Work ongoing with LGR colleagues to align approach to market. A new agency framework strategy is being actively developed for the new Somerset Council.</p> <p>A step by step guide for the recruitment of agency workers within SSDC has been produced and is being rolled out for the interim</p>	Lead Specialist - Procurement	<p>Completed</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Completed</p> <p>By November 2022</p> <p>June 2022</p>

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7	<p>Ensuring that applicants are aware that they must declare any involvement in any other businesses and any conflict may result of the job offer not being able to be made</p> <p>The recruitment of family members and what should be declared should be part of SSDC's Recruitment Policy.</p>	<p>At all stages of the recruitment process potential candidates are required to declare any conflict of interest. This includes at the stage of advertisement, application, interview, and in the offer letter.</p> <p>The 'New Starter' form also requires the recruiting manager to confirm that no declaration has been made or any other outside interest is recorded.</p> <p>Recruitment policy and procedure has been updated and requires candidates and their recruiting managers to declare any relationships. All applications, both external and internal have been reviewed and updated.</p>	People Specialist	<p>Completed</p> <p>Completed</p> <p>Completed</p>
8	<p>Corruption and bribery training should be a mandatory part of the induction process for all new employees and should be given to employees on a periodic basis, including a test of their understanding.</p>	<p>Bribery and Corruption training promoted in February as part of the wider annual compliance/governance refresher training programme.</p> <p>By 09.05.22 74% of all staff had completed the training</p> <p>Proactive approach through people managers and 1-2-1's with staff to ensure all employees complete the training</p>	Lead Specialist – Procurement, Performance and Change	<p>Completed</p> <p>Ongoing</p> <p>Ongoing</p>

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9	The financial process for using P cards and expenses must be reviewed and updated to prevent the improper use of the facility.	<p>Reviewed and updated Procurement Card Procedures/ training notes and fact sheet of commonly asked questions</p> <p>All users reminded of their responsibilities</p> <p>Monthly transactional report monitoring implemented – sent to budget holders and subject to audit checks by finance officers.</p>	Lead Specialist - Finance	<p>Completed</p> <p>Completed</p> <p>Reporting effective from 01.04.22</p>