

Action Plan Following Independent Investigation

Title	Recommendation	Action	By whom	By When
1	<p>The Council's policy on allowing senior managers and other employees to own and manage businesses or take on other paid work should be reviewed and clarified both at interview and in the conditions attached to appointment.</p>	<p>Following consultation with Trade Unions, Senior Managers contracts have been amended to state that only work for the Council is permitted, unless there is express permission granted and providing additional activities do not give rise to conflicts of interest.</p> <p>With regards to the rest of the existing workforce, Trade Unions have been consulted, whilst reviewing and clarifying employee's role titles it is proposed making this contract amendment at the same time.</p> <p>Code of Conduct mandatory training was rolled out in December 2022. Conflict of Interest forms are being sent to individuals on completion of the training.</p> <p>Where a conflict of interest arises, discussion will need to be held with People Manager / Director, People Specialists and Trade Unions to determine a way forward.</p> <p>Recruitment Interview template includes declarations of interest proforma for all posts.</p>	Lead Specialist - People	<p>Completed Dec 21</p> <p>Ongoing</p> <p>By end of Feb 23</p> <p>Ongoing</p> <p>Completed</p>

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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, has been revised and updated.</p> <p>Code of Conduct training rolled out from December 2022.</p>	Monitoring Officer	<p>Completed</p> <p>Completed</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 have been developed, including a process to provide an auditable record of completion within the LMS (Learning Management System)</p> <p>An online training module was included in the Mandatory Employee Training Programme for 2022/23 following sign off by the unions and was rolled out to employee group from 5th December. By 17.01.2023 91% of all staff had completed the training. Training on the Code of Conduct is also being deployed via toolbox talks for relevant staff.</p>	Monitoring Officer	Completed

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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 is now carried out as part of the induction process for all new starters.</p>	<p>S151 officer and Lead Specialist – Finance</p> <p>S151 Officer</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>

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		Considering the impending changes to Financial Regulations for the new Somerset Council, training for all staff is being prepared on the new regulations and will be rolled out after Vesting Day.		
6	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>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 automatically issued with PO's. This will be addressed through the implementation of a new financial management system for the new Somerset Council in April 2023.</p> <p>All procurements over £25K are required to be reviewed by the procurement specialist in line with adopted Contract Standing Orders.</p> <p>The procurement specialist has reviewed the council's approach to agency staffing in conjunction with the People team and Monitoring Officer and new interim guidance has been developed by the People team to reduce the risk of conflicts of interest arising.</p> <p>All agency agreements information collated and provided to SCC to assist with the procurement of a new supplier(s).</p>	Lead Specialist - Procurement	<p>Completed</p> <p>Completed</p> <p>Ongoing</p> <p>Completed</p> <p>Completed</p>

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		<p>Work ongoing with LGR colleagues to align approach to market. A procurement exercise has been completed by Somerset County Council for an agency staffing provider and will in place for the new Somerset Council.</p> <p>A step-by-step guide for the recruitment of agency workers within SSDC has been produced and has been rolled out for the interim by the People team.</p>		<p>Completed</p> <p>Completed</p>
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>

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8	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>Bribery and Corruption training promoted in February as part of the wider annual compliance/governance refresher training programme.</p> <p>By 17.01.2023 96% 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>
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>

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