

Governance Review – Culture and Values

March 2019

Employees

Councillors

Responses to the survey...

2534

2534 employees completed the survey



57%



46%

32

32 Councillors completed the survey

Employee's feel...

The majority of employees provided positive feedback towards the council as a whole and their opinion of the council's behaviour is positive



... Councillors feel

The majority of Councillors provided positive feedback towards the council as a whole and their opinion of the council and councillors behaviour is overall positive

Delivers good services	They are supported	The council is ethical	They know the values	Money is used responsibly	Respected by other Councillors	The Council is ethical	They know the values
90%	96%	87%	97%	91%	97%	94%	100%

Outcome of the Assessment of Maturity...

Level 3



Good culture and ethical framework is working for the Council & key partners

Proud of where we work...

88%



88% of employees have a sense of pride working for LCC. 90% also believe LCC provides a good service to residents.

100% of Councillors are proud to sit on Lincolnshire's County Council

Whistle blowing...

91%



91% of Councillors are aware of the whistle blowing process and 89% of employees are aware of the whistle blowing process

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Distribution

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Executive Summary

From the beginning of our review it was clear that the Council has well defined values that are understood and influence the culture of the authority. There is recognition of some cultural differences across the wide variety of service areas the Council has, but this is seen to be more beneficial as services are so different and not considered detrimental to the overall corporate culture.

There was a strong positive response to our survey, workshops and interview process. Comments around the overall culture at the Council included:

*"There is an **open door** policy and people come in and **say what they think**, debate is logical"*

*"A **positive culture** that is **lived**, not just quoted"*

*"**Open, transparent and inclusive**".*

We found that the core values¹ were at the heart of what the Council does. Members and officers recorded a 100% and 97% positive response respectively that they understood the values of the Council.

Conclusions on the individual assessment criteria

On the basis of the evidence obtained during our review we have concluded as follows:

Strand	Assessment of maturity (scale 1 to 5)	
Leadership and Management	4	Embedded and integrated
People	3	Working
Culture, Values and Consistency	3	Working
Processes and Procedures	4	Embedded and integrated
Assurance and Accountability	3	Working

¹ Council's values – Professional, Resourceful, Respectful, Reflective

Overall Conclusion and recommendations

Our overall assessment is that the Council has reached **Level 3** in its governance arrangements around culture and values.

Level 3	Good culture and ethical framework is working for the Council & key partners
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Key Findings

During the review we found many examples of good practice, these include,

- Clear and effective Leadership setting the 'tone from the top'.
- Although culture can be a hard area to pinpoint we found agreement and understanding across officers and members. Individuals gave similar responses on their feeling of positive culture and values at the Council.
- There was strong positive feedback from the workforce towards the Council as a whole. Officers and Members gave an average 95% positive response that they understand the Council's values, that they have the support of colleagues and that the Council is ethical and respectful.
- Clear corporate values and behaviours which are threaded through employee induction and appraisal systems.
- Active encouragement and promotion of high standards by the Management throughout the Council.
- The feeling of confidence to empower and be empowered to take decisions
- A willingness to subject the Council's governance arrangements around culture and its ethical framework to independent review and assessment. Modify existing arrangements where possibilities exist to support further integration and embedding.

Suggested Improvements

It is not unexpected, given the nature of the review, the results showed some mixed messages – but it does give the Council the opportunity to reflect on the findings and a platform to seek improvements. Key areas for consideration include –

Ref	Recommendation
R1	Senior managers need to be more visible to those not based in Lincoln and On Call fire fighters. This has started to be addressed through CEX roadshows and more are planned for Spring 2019. Periodic attendance by senior management at team meetings to discuss objectives, values and culture will also help keep the connection with more remote team members.

Ref	Recommendation
R2	A review of lessons learnt from the recent senior leader appointments should be undertaken – with consideration of 'cultural fit' in the recruitment process.
R3	That the Head of Paid Service and new Corporate Management Board consider whether there is a need to develop a statement to describe the Council's culture – linking this to the stated Values.
R4	<p>The appraisal process should be reviewed to ensure that the individual is at the heart of the assessment and there is adequate focus on achievement and development.</p> <p>Consider ways the Council can make better use of appraisal data. Currently number driven analysis should be expanded to bring out information that can be acted upon to improve workforce development.</p>
R5	<p>There is no specific training or e-learning around the Council's ethical framework. This should be established and cover:</p> <ul style="list-style-type: none"> • Values and Culture of the Council • Bringing them to life on a day to day basis • Expectations around key policies such as gifts and hospitality, Whistleblowing, counter fraud, identifying and managing personal relationships at work (potential conflicts of interest)
R6	We suggest that employees and members are reminded of expectations around the Council's ethical values and key policies – emphasising the safe and secure whistle blowing arrangements put in place.
R7	Raise awareness across the workforce on the how to respond and report issues which may breach our codes of conduct – even if information is shared in confidence.
R8	The Council continues its review of the Overview and Scrutiny process and considers information, training, and support to enable getting the most effective challenge and pre-decision scrutiny for the Council on its key decisions.
R9	The Council uses the report on Local Government Ethical Standards by the Committee on Standards in Public Life to review the Members Code against the Committee's recommendations and update as considered appropriate.
R10	Review of declarations of interests, gifts and hospitality as per the recent audit report considering the recommendations made in the recent review by the Committee on Standards in Public Life.

Ref	Recommendation
R11	Consider updating the website with information on the Council's governance / ethical framework – including all relevant policies. This will help support transparency and accountability within the Council and set out expectations to those who work with or for the Council.
R12	Only about 15% of leavers since April 2015 have record of an exit interview on the system – whilst these are not mandatory managers should be reminded to encourage them wherever possible to try and increase this rate and the valuable feedback they can provide as this can help improve workforce motivation and satisfaction in the future.
R13	To include in the Audit Committees work plan areas around standards and the Council's ethical framework eg reviewing contract exceptions, member code of conduct, gifts and hospitality etc.

Reporting and next steps

Our findings and recommendations are set out in the following sections of the report. These recommendations provide a roadmap for future improvements – creating an action plan designed to sustain a culture of integrity to enhance and embed good governance across the Council.

Background

It is crucial to the Council's success that its governance arrangements are applied in a way that demonstrates the spirit and ethos of good governance – this cannot be achieved by rules and procedures alone. The Council is expected to have a culture that places the public and integrity at the heart of its business.

Organisations have developed a greater awareness of their ethical obligations partly due to the high profile failures of some organisations to adhere to the Standards of Public Life.

The public expect services to be delivered responsibly and ethically, regardless of the provider. They also need to apply high ethical standards when managing public money.

The Officer and member leadership have prime responsibility for defining and analysing organisational culture by promoting good ethics and values – this review aims to provide them with some insight on this.

Our report sets out the results of our independent assessment of how well the Council's governance arrangements work in practice on a scale of 1 to 5 – where level 5 is the highest level of maturity. The assessment is based upon the principles of good practice in good governance as recognised by:

- CIPFA / SOLACE²
- International Federation of Accountants
- Institute of Business Ethics
- Committee of Standards in Public Life
- Institute of Internal Auditors

In this context the level of ethical maturity is described as follows:

Maturity Level	Descriptor
1	Good culture & ethical framework are emerging within the Council
2	Good culture and ethical framework is happening within Council & key partners
3	Good culture and ethical framework is working for the Council & key partners
4	Good culture and ethical framework is embedded & integrated within the Council & key partners
5	Good culture and ethical framework is driving the Council

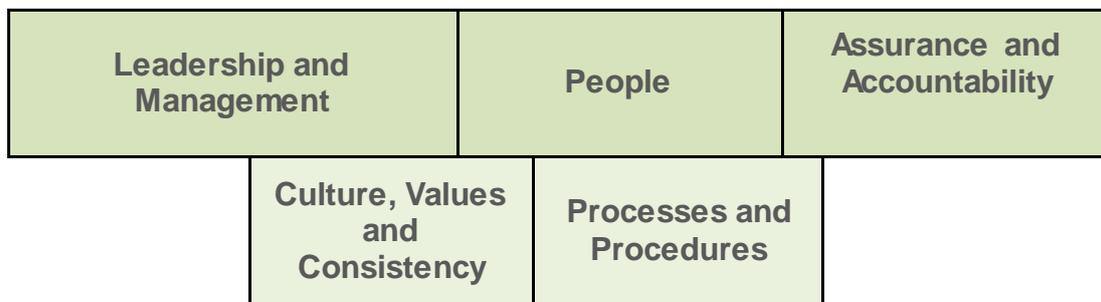
² The Chartered Institute of Public Finance and Accountancy and Society of Local Authority Chief Executives

Our Scope and objectives

The **scope** has encompassed key aspects of **Principle A - Integrity & Values** of the good practice:-

"Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law".

Specifically, we have focussed on five recognised 'strands' that support an effective culture and ethical framework, namely:



Our main **objective** has been to assess the current level of Culture and Ethical maturity across the Council and to work with you to develop an action plan to support success and continuous improvement of good governance.

Our Approach

To help us establish how your governance arrangements work in practice our approach has included the following:

- A staff **survey** (2017) and Member **survey** (2018) with questions around
 - Behaviour
 - Understanding of policies
 - Scenarios

Exploring employees and managers attitudes to certain ethical practices in the workplace and their perceptions of ethical behaviour in the organisation.

- **Data analytics** – a comprehensive review of relevant documentation and the intelligence that these show us eg complaints, staff exit interviews, whistleblowing.
- **Focus groups** to research and obtain perceptions, opinions, beliefs and attitudes around the 'ethical mind-set' on how you do your business and make decisions.
- **Discussions with key stakeholders** – including the Leader of the Council, Corporate Management Board, lead members, Heads of Service and Chairman of the Audit Committee.

Key Question

Do senior officer's and member's support and promote expectations around ethical conduct?

Why is it Important

Clear leadership from the very top level of the organisation is crucial to the Council's success. How it conducts its business is as important as what it does. Senior officer and member leaders need to recognise and actively support a culture that places the public and integrity at the heart of its business and decision making – championing this throughout the organisation.

Findings

Responses confirmed that 87% of staff and 94% of members think Lincolnshire County Council is an ethical organisation. 96% of staff and 97% of members feel respected and supported, indicating a strong positive culture.

There is a clear "tone from the top" around what Senior Management and Members expect from the organisation – communicating shared values with members, staff and the community and partners.

Leaders have defined the way that the Council expects its employees to behave and conduct themselves and this is documented in the Code of Conduct.

Ethical behaviour is also at the heart of the Council's values: Professional, Respectful, Resourceful, and Reflective.

Part 5 of the Council's constitution sets out expectations on Members standards, values and code of conduct.

During 2018 the Council saw a great deal of change in its officer leadership with four different Heads of Paid Service and the appointment of new Executive Directors. Such extensive changes in senior management inevitably bring with them differences in approach, vision, management style and cultural assumptions. This in turn can impact on the "tone from the top" and potentially blur previously clear messages about the Council's culture and values.

It is particularly important that the Council's culture and values play a key role in all stages whether that be recruitment, induction or the ongoing building of senior management relationships at such times of change.

A recent HMICFRS³ inspection of Fire and Rescue reported Staff on the whole displays a positive and friendly culture that is focused on people.

The Audit Committee terms of reference set out its role and responsibilities – this includes oversight of member standards and the Governance & Ethical Framework of the Council.

People generally thought the senior managers display corporate values and this has improved over the last decade or so. Some, especially those outside of Lincoln, felt disconnect from senior management. They felt the Council is 'Lincoln centric'. This was also the outcome in a recent Fire and Rescue inspection that reported senior managers are well regarded by most whole-time staff. They describe them as visible and approachable. However they did report On Call firefighters' disconnectedness from senior management, the County Council and its values.

Conclusion

Level 4 Good culture and ethical framework is embedded & integrated within the Council & key partners

Scope for further improvement

Ref	Recommendation
R1	Senior managers need to be more visible to those not based in Lincoln and On Call fire fighters. This has started to be addressed through CEX roadshows and more are planned for Spring 2019. Periodic attendance by senior management at team meetings to discuss objectives, values and culture will also help keep the connection with more remote team members.
R2	A review of lessons learnt from the recent senior leader appointments should be undertaken – with consideration of 'cultural fit' in the recruitment process.
R3	That the Head of Paid Service and new Corporate Management Board consider whether there is a need to develop a statement to describe the Council's culture – linking this to the stated Values.

³ Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services

Key Question

Are people aware of our values, our ethical and governance framework?

Why is it Important

People who work in or for the public sector need to understand the standards of public life and the requirements placed upon them. It is extremely important to develop, review and maintain an effective awareness and training strategy within the context of overall organisational development strategies.

Findings

Our work has told us that members and staff know what is expected of them around culture and behaviours. 97% of employees and 100% of members consulted knew the values of the Council.

There is good understanding throughout the organisation of individual and collective responsibility for maintaining high ethical standards

The organisation has a positive record for good governance & ethical decision-making. The Council regularly reviews its Constitution, Code of Conduct and Annual Governance Statement.

Our conversations further confirmed that people are aware of our frameworks for values, ethics and governance and how these link into their training, development and appraisal. Whilst people were familiar with the values they found it harder to describe culture. They felt this was not really defined and that it differed from one director area to the next.

The code of conduct and other ethical guidance are easily accessed on the Council website and people knew where to find them.

One area where knowledge of corporate values and culture requires improvement is for On Call firefighters. The recent HMICFRS inspection of Fire and Rescue reported:

'We found that many staff do not understand the service's values, or the concepts behind them. This is most notable among on-call firefighters. They describe themselves as disconnected from the senior management team at the service headquarters and the county Council. On-call station staff say they feel a greater sense of identity with their local community

than with the fire and rescue service. As a result, some on-call stations have developed their own values that they view as more relevant'.

We evidenced a number of examples of good practice:

- Induction process for staff which includes reference to the Code of Conduct and Council values framework.
- Values and culture questions included in the staff survey.
- A complaints process that ensures that outcomes and actions are reported to back to services as well as members through Audit committee meetings— supporting resolution and future learning to take place.
- There is good awareness values and behaviours expected in delivering services to the public.
- 96% of staff feel they are supported.
- 97% of staff saying they know the values.
- Good working relationships with the Unions through the JCC panel.

We asked staff for suggestions on 'what would improve the way the Council is run / operates?' The following areas were mentioned:

- Less focus on statistics and more focus on individuals and the value they add.
- Building better relationships with partners.
- The positive steps being taken to develop a next generation workforce.
- Use the power of informal conversation to strengthen relationships and create inclusive decision making.
- Continue to encourage people to be open and honest so learning can continue.
- Work better with customers – engage with them rather than impose on them.

For Members the following suggestions were made:

- More opportunity for informal discussions and information sharing between members and officers.
- Easier ways to do things online.
- Better communication links that are effective across the whole county.
- More information sharing with Councillors.

Conclusion

Level 3 Good culture and ethical framework is working for the Council & key partners

Scope for further improvement

Ref	Recommendation
R4	<p>The appraisal process should be reviewed to ensure that the individual is at the heart of the assessment and there is adequate focus on achievement and development.</p> <p>Consider ways the Council can make better use of appraisal data. Currently number driven analysis should be expanded to bring out information that can be acted upon to improve workforce development.</p>
R5	<p>There is no specific training or e-learning around the Council's ethical framework. This should be established and cover:</p> <ul style="list-style-type: none"> • Values and Culture of the Council • Bringing them to life on a day to day basis • Expectations around key policies such as gifts and hospitality, Whistleblowing, counter fraud, identifying and managing personal relationships at work (potential conflicts of interest)

Key Question

How does the organisation perceive member and management's commitment to compliance?

Why is it Important

This question is about the effectiveness of action taken for bad practice across all levels of the organisation. It is vital that bad practice is handled appropriately and proportionately as this influences people's attitudes, habits and behaviours.

Senior leaders need to encourage and support people to raise concerns without fear of reprisal – learning from mistakes and promoting a 'just culture'.

Ethics is about making choices. Decisions about right and wrong are part of everyday life. Delivering services in the public sector it's about –

'doing the right things in the right way – putting the public interest in decision making at all times'

It is widely accepted that ethics begins where the law ends – consequently ethical decisions commonly inhabit what are referred to as 'grey areas' where the course of action invariably is not a simple black/white decision. Differences in opinion, upbringing and experience influence people's **behaviours** and **attitudes** at work. We asked a number of questions to test this out – the results showed:

- Members overwhelmingly selected the 'most ethical' answer.
- there were a very small number of outliers stating that it was 'totally acceptable' to:
 - accept gifts from a potential supplier or contractor at the time of awarding contracts
 - recommend family or friends when awarding contracts or recruiting for a job

Policy and procedures do exist to help manage potential conflicts of interest but the above does indicate that it may be worthwhile reminding members and staff of some of these.

89% of employees and 87% of members are aware of the Council's whistleblowing facilities and 100% of members are aware of the role of the Council's monitoring officer.

Generally people felt the Council makes it easy to report wrong doing and were confident that if they reported wrong doing it would be followed up. There were some instances of people disclosing concerns regarding behaviour to peers in confidence. Generally these confidences were maintained, when it would have been in the interest of the individual and the Council for confidence not to be accepted and the concerns escalated.

Discussions at focus groups provided feedback that the Council responds fairly to serious mistakes. They recognised the need to manage each case differently and talked about people needing to take, and be held to account for their actions and they recognised that this is not the same as blame.

Employees at all levels talked about accountability and decision making. They felt that managers at all levels demonstrated willingness to empower people to make decisions.

Our discussions verified that people thought communication between members, officers, suppliers and contractors is open and honest with good relationships established. We did get feedback from some stakeholders on the quality of information to scrutiny in terms of timing and also support of officers. They felt this could be improved to inform members of options sooner and to provide more information to allow them to fully appraise all options.

The East Midlands Councils completed a review over scrutiny arrangements, making a number of recommendations that were implemented by the Council from May 2017. Work is currently being undertaken to review what difference this has made and if any further improvements could be made. This should take account of feedback from this review.

We noted that the Council's member code of conduct was established in 2012. Expectations and good practice has changed since and the recent publication of the report on Local Government Ethical Standards by the Committee on Standards in Public Life provides the Council with an opportunity to review the Members Code against the Committee's recommendations.

Conclusion

Level 3 Good culture and ethical framework is working for the Council & key partners

Scope for further improvement

Ref	Recommendation
R6	We suggest that employees and members are reminded of expectations around the Councils ethical values and key policies – emphasising the safe and secure whistle blowing arrangements put in place.
R7	Raise awareness across the workforce on the how to respond and report issues which may breach our codes of conduct – even if information is shared in confidence.
R8	The Council continues its review of the Overview and Scrutiny process and considers information, training, and support to enable getting the most effective challenge and pre-decision scrutiny for the Council on its key decisions.
R9	The Council uses the report on Local Government Ethical Standards by the Committee on Standards in Public Life to review the Members Code against the Committee's recommendations and update as considered appropriate.

Key Question

Are there clear policies and procedures for standards of conduct, linked to the CIPFA / SOLACE Delivering Good Governance Framework – Principle A – Integrity & Values?

Why is it Important

Policies and procedures need to be user-friendly, understood and accessible to clarify expectations around conduct and behaviour – the culture and values of the organisation. They need to be flexible enough to allow for changes faced by the sector in general.

Findings

Currently the Council's governance framework is based on the following:

- Delivering Good Governance in Local Government Framework 2016 Edition CIPFA.
- Audit Committee.
- Governance Framework and Annual Governance Statement.

During 2016 we benchmarked the Council against the CIPFA Delivering Good Governance in Local Government Framework. This provided substantial assurance around the quality of the Council's governance processes and procedures.

Our review evidenced a commitment to setting expectations around ethical governance – integrity and values in the following ways:

- We confirmed that a code of conduct is in place.
- The Council has counter fraud and whistleblowing policies.
- A complaint policy is in place.
- Financial regulations are in place that set out expectations and accountabilities and are in the process of being updated.
- There is an effective risk management strategy and process in place.
- A gifts and hospitality policy and register is in place - although we acknowledge that the process needs improvement following a recent Internal Audit.

Our examination of the documents in place confirmed that the policies are fit for purpose as well as being up to date. Those reviewed also included the constitution, disciplinary policy and procedures, grievance policy and procedures, recruitment and

selection, and records management.

We recently conducted an audit of register of interests, gifts and hospitality which made some recommendations around updating the policy to ensure clarity and consistent application. A recent review by the Committee on Standards in Public life highlighted some recommended actions in relation to declarations of interest, gifts and hospitality. These recommendations should be considered as part of the review.

Our review of the Council's website confirmed that although documents and policies can be found it was not easy to navigate or identify the Council's local code of corporate governance eg how the Council is run, its values and code of conduct, Annual Governance Statement.

Conclusion

Level 4 Good culture and ethical framework is embedded & integrated within the Council & key partners

Scope for further improvement

Ref	Recommendation
R10	Review of declarations of interests, gifts and hospitality as per the recent audit report considering the recommendations made in the recent review by the Committee on Standards in Public Life.
R11	Consider updating the website with information on the Council's governance / ethical framework – including all relevant policies. This will help support transparency and accountability within the Council and set out expectations to those who work with or for the Council.

Key Questions

Does the organisation have assurance that its governance framework is working well?

How effective is the structure for monitoring ethical conduct and enforcing accountability?

Why is it Important

This is about the day to day reality, and specifically about the extent to which governance issues are handled well. The organisation needs to have assurance that its governance arrangements work well in practice – giving the public an open and honest account on any significant governance issues it is facing.

Findings

The public want services to be delivered responsibly and ethically, regardless of the provider. They also need to apply high ethical standards when managing public money⁴.

Organisations have developed a greater awareness of their ethical obligations in recent years – partly due to the high profile failures of some organisations to adhere to the Standards of Public Life⁵.

Our review provides strong evidence that governance framework work well.

Turnover of staff and staff sickness levels are two strong indicators of an effective governance framework. Staff turnover of 10.92% falls within the 'healthy' national of 10-12% and sickness averaged 6.1 days per employee against a target of 7.5 at the end of Dec 17.

Exit interviews are available to all leavers if they wish to partake. Currently only 15% of leavers have an exit interview on record. These interviews can provide valuable insight into culture, ethics and improvements to the employee experience so whilst not mandatory managers should encourage these to be completed.

Records of Council disciplinary hearings show the most frequent reason is Behaviour, along with standards of work, demonstrating the Council's strong approach to dealing with issues relating to behaviour.

Statistics on use of the whistleblowing line demonstrate that

⁴ The Committee on Standards in Public Life – The Continuing Importance of Ethical Standards for Public Service Providers – May 2018

⁵ Selflessness, integrity, objectivity, accountability, openness, honesty, leadership plus stewardship of resources

this is a trusted confidential reporting mechanism and that both employees and the public are confident to use it.

Complaints are monitored and reported to audit committee annually and do not identify any trends in relation to complaints about ethics or behaviours.

The Council has an annual 'Combined Assurance report' which is reported to the Corporate Management Board and Audit Committee with the support of its Internal Auditors – Assurance Lincolnshire.

This process provides an assurance overview of the Council's critical services is reviewed by senior management and members and provides information and supports the Annual Governance Statement and the Annual Internal Audit Plan.

The Council produces an Annual Governance Statement. It requires an organisation to report publicly on the extent to which they comply with their own governance arrangements on an annual basis.

Whilst the Audit Committee Terms of Reference requires them to review matters in relation to standards the only work undertaken in recent times is to receive the annual report on complaints.

Conclusion

Level 3 Good culture and ethical framework is working for the Council & key partners

Scope for further improvement

Ref	Recommendation
R12	Only about 15% of leavers since April 2015 have record of an exit interview on the system – whilst these are not mandatory managers should be reminded to encourage them wherever possible to try and increase this rate and the valuable feedback they can provide as this can help improve workforce motivation and satisfaction in the future.
R13	To include in the Audit Committees work plan areas around standards and the Council's ethical framework eg reviewing contract exceptions, member code of conduct, gifts and hospitality etc.

Appendix 1 – Some useful definitions

Governance



"Achieving the Intended Outcomes While Acting in the Public Interest at all Times"

It is comprised of systems, processes, culture and values, by which the Council is directed and controlled and through which they account to shareholders on their stewardship.

The public want all providers of public services to adhere to and operate by common ethical standards, regardless of whether they are in the private, public or voluntary sectors. For the public "how" things are done are as important as "what" is done⁶.

Good Governance can mean different things to people – in the public sector it means:

"Achieving the Intended Outcomes While Acting in the Public Interest at all Times"

"If management is about running the business – governance is about seeing that it is run properly"⁷

It means:

- **Reflecting the organisations values** – the principles and standards underpinning the way we interact with others to support excellent service delivery
- **Behaviour** – the way we conduct ourselves and act out those values as part of our day to day functions in business operations and service delivery (the principles of public life). How this is perceived by colleagues, members of the public, partners, suppliers and the media
- **Good governance** – achieving business success by having the good systems and processes in place to run the organisation well

It means distinguishing between:

- **Simple mistakes or errors** – individuals should not be 'blamed' for things going wrong but they should be held accountable for their actions and learn from mistakes
- **Risky behaviour** – having a strong risk and control culture. Clearly understanding your risks and their potential impact. Where risk decisions need to be improved then individuals should be coached and educated to be more careful
- **Reckless behaviour** – systems and processes set up to encourage people to comply but where they deliberately over-ride controls – action is taken

⁶ Committee on Standards of Public Life – Ethical Standards for providers of public services

⁷ Robert Tricker. An expert in Corporate Governance.

Public Interest

The definition of public interest is complex and can vary but a useful way to think about the 'public interest test' is to reflect on the following.

It's more than putting self-interest aside – it also includes the spirit of public services (integrity and transparency).

The public want services to be delivered responsibly and ethically, regardless of the provider. They also need to apply high ethical standards when managing public money⁸.

Organisations have developed a greater awareness of their ethical obligations in recent years – partly due to the high profile failures of some organisations to adhere to the Standards of Public Life.⁹

It's about:

- Ensuring that private interests do not interfere with the broader public interest considerations (social responsibility).
- Making sound decisions and informed judgements with an evidenced based decision making process – avoiding suggestion of private gain
- As part of the decision making rationale to not only think about 'what' you are doing but 'how' and 'should' you do it. You still may go ahead but you will have a more informed rationale.
- Having an 'ethical mind-set' – it's about the Leadership Team looking at high profile cases where something has gone wrong and asking yourself - could it happen here? If it did would we get to know about it?
- Taking care that own political and intellectual priorities and prejudices do not interfere with their judgement or their responsibilities
- Managing conflicts as they inevitably arise – in a transparent and appropriate manner

⁸ The Committee on Standards in Public Life – The Continuing Importance of Ethical Standards for Public Service Providers – May 2018

⁹ Selflessness, integrity, objectivity, accountability, openness, honesty, leadership plus stewardship of resources

What we do best...

Innovative assurance services

Specialists at internal audit

Comprehensive risk management

Experts in countering fraud

...and what sets us apart

Unrivalled best value to our customers

Existing strong regional public sector partnership

Auditors with the knowledge and expertise to get the job done

Already working extensively with the not-for-profit and third sector

Disclaimer

The matters raised in this report are only those which came to our attention during our internal audit work. Our quality assurance processes ensure that our work is conducted in conformance with the UK Public Sector Internal Audit Standards and that the information contained in this report is as accurate as possible – we do not provide absolute assurance that material errors, fraud or loss do not exist.

The Head of Audit is only responsible for the due professional care in developing the advice offered to managers on risk, control and governance issues. Where managers accept our advice they accept the accountability for the consequences of implementing the advice. Internal Auditors working in partnership with managers during the consultancy assignment will not take part in any sign off decision.

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