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DATE: 14 January 2019

To: Members of the  
**STANDARDS COMMITTEE**

Councillor Vanessa Allen, Councillor Nicholas Bennett J.P., Dr Simon Davey,  
Councillor Melanie Stevens, Councillor Michael Tickner and Councillor Stephen Wells

A meeting of the Standards Committee will be held at Committee Room 6 - Bromley  
Civic Centre on **TUESDAY 22 JANUARY 2019 AT 7.00 PM**

MARK BOWEN  
Director of Corporate Services

#### A G E N D A

- 1 TO APPOINT A CHAIRMAN AND VICE-CHAIRMAN FOR 2018/19
- 2 APOLOGIES FOR ABSENCE
- 3 DECLARATIONS OF INTEREST
- 4 QUESTIONS FROM MEMBERS OF THE PUBLIC ATTENDING THE MEETING

In accordance with the Council's Constitution, questions to the Chairman of this Committee must be received in writing 4 working days before the date of the meeting. Therefore please ensure questions are received by the Democratic Services Team by 5pm on Wednesday 16<sup>th</sup> January 2018.

- 5 **MINUTES OF THE MEETING HELD ON 22ND FEBRUARY 2018 AND MATTERS ARISING**  
(Pages 1 - 4)
- 6 **DISCUSSION WITH HEAD OF AUDIT**
- 7 **ANNUAL GOVERNANCE STATEMENT**  
(Pages 5 - 28)

**8 MONITORING OFFICER'S GENERAL REPORT**  
(Pages 29 - 42)

**9 LOCAL GOVERNMENT ACT 1972 AS SUBSEQUENTLY AMENDED**

The Chairman to move that the Press and public be excluded during consideration of the items of business listed below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of confidential information.

**Items of Business**

**Schedule 12A Description**

- |   |  |
|---|--|
| <b>10 EXEMPT MINUTES OF THE MEETING HELD ON 22ND FEBRUARY 2018</b><br>(Pages 43 - 44)   | Information which is likely to reveal the identity of an individual. |
| <b>11 MONITORING OFFICER'S GENERAL REPORT: APPENDIX - COMPLAINTS</b><br>(Pages 45 - 46) | Information which is likely to reveal the identity of an individual. |

## STANDARDS COMMITTEE

Minutes of the meeting held at 7.00 pm on 22 February 2018

### Present:

Councillor Ian F. Payne (Chairman)  
Councillor Vanessa Allen (Vice-Chairman)  
Dr Simon Davey, Councillor David Livett, Mr Nicholas  
Marcar, Councillor Michael Tickner and Councillor Stephen  
Wells

### 10 APOLOGIES FOR ABSENCE

There were no apologies for absence.

### 11 DECLARATIONS OF INTEREST

There were no declarations of interest.

### 12 QUESTIONS FROM MEMBERS OF THE PUBLIC ATTENDING THE MEETING

No questions had been submitted before the deadline. The Chairman reported that he had been contacted by a member of the public asking whether there was any intention to change the Council's Code of Conduct in the light of the Development Control Committee's recent re-consideration of the planning application for the proposed Bullers Wood Boys School. This issue would be considered by the Committee.

### 13 MINUTES OF THE MEETING HELD ON 6TH JULY 2017 AND MATTERS ARISING

It was noted that the Head of Audit should have been invited to attend this meeting; this would now be arranged for the Committee's next meeting.

**RESOLVED** that the minutes of the meeting held on 6<sup>th</sup> July 2017 be confirmed.

### 14 MONITORING OFFICER'S GENERAL REPORT Report CSD18033

The Committee considered a report from the director of Corporate Services as Monitoring Officer summarising a number of issues for consideration.

### Code of Conduct

At its last meeting, the Committee had agreed that no changes were needed to the Code of Conduct except that a Member with a disclosable pecuniary

interest should be allowed to remain in a meeting provided that they did not address the Committee where that right would be available to a member of the public.

One area where the Code could be made more consistent was in the issue of declaration of non-pecuniary, personal interests. Bromley's Code of Conduct went beyond the statutory provision in requiring Members to register a range of personal interests and gifts and hospitality. Although most Members routinely declared such interests when they arose in meetings, there was no requirement to do so in the Council's Code of Conduct. The Committee concluded that the current Code of Conduct worked well and there was no need to make a further change. It was suggested that a print-out of the Register of Interests could be brought to each meeting so that it could be inspected by members of the public.

It was confirmed that new Councillors would be provided with a copy of the Code of Conduct.

**RESOLVED that no further changes to the Code of conduct be recommended.**

#### **Registration of Gifts and Hospitality**

The Committee received a schedule (Appendix A to the report) setting out all gifts and hospitality declarations made by Councillors in the current Council – from May 2014. It was suggested that the Committee should review these declarations at their meetings on a regular basis. Committee Members commented that in some cases it was not clear who had provided hospitality – this was as important as the date, the event and the value. It was also suggested that there should be a RAG system linked to different values of hospitality received.

**RESOLVED that the declarations of Gifts and Hospitality made since May 2014 be noted.**

#### **Review of Local Government Ethical Standards**

The Committee on Standards in Public Life was conducting a stakeholder review of local government ethical standards and was carrying out a public consultation closing on 18<sup>th</sup> May 2018. The Standards Committee was asked to consider whether Bromley should respond to the consultation, and whether there were any areas of particular concern.

The Committee considered that the main area of concern was the lack of sanctions open to Standards Committees, and the potential reliance on party groups to suspend or discipline their Members. There were criminal penalties for serious failures to register or declare disclosable pecuniary interests, but the vast majority of complaints against Members were fairly trivial and often related to issues where the complainant was not happy with a Council decision, or where Councillors had, legitimately, expressed a strong view on

an issue. The Monitoring Officer highlighted that Councillors were not disqualified from office if convicted of a criminal offence unless given a sentence, suspended or not, of at least eighteen months. This was a loophole that could potentially see a Member convicted of a serious offence but still able to continue as a Councillor.

The Monitoring Officer confirmed that the Committee could still hold hearings to investigate particular complaints, but that where this was required he had to consult with one of the Independent Persons.

A Member noted that there were stiff penalties for offences involving electoral fraud – Councillor Michael Tickner declared that his company was involved in providing postal services for the Electoral Commission.

**RESOLVED that a response be sent to the consultation setting out the Committee's concerns about disqualification from office and the lack of sanctions available to Standards Committees, as outlined above.**

### **Annual Governance Statement 2017/18**

The Committee was informed of the timetable for the production of the Annual Governance Statement for 2017/18, which formed a part of the Council's statutory accounts. With the example of the statement for 2016/17 before them, the Committee provided comments as follows –

Page 26: Members asked whether the Standards Committee had the right profile, and whether the public, contractors and officers were aware of the processes for complaining against Councillors.

Page 28: Regarding the review of effectiveness of the governance framework, a member suggested that the phrase "detailed checklist" was perhaps a little too glib. Members asked whether there was indeed a thorough check, or just a paper exercise.

Page 30: Members noted the comment in the text that Internal Audit was "generally" compliant, and suggested stronger language could be used. It was also suggested that evidence was needed to support the comment that the authority's fraud arrangements were satisfactory.

Page 31: The Committee noted that although the formal Ofsted judgement of Inadequate for Children's Services was still in place until the next inspection, the Council had confronted the issues and the direction of travel was very positive.

Page 32: Officers would check whether reference to the Youth Justice Board was required in relation to the Youth Offending Service.

Councillor Wells, as chairman of the Contracts Sub-Committee, asked whether the Council could insist that potential contractors complied with the same levels of ethical conduct as the Council. The monitoring Officer

responded that although equalities issues could be taken into account, broadly speaking the Council had to take a commercial view when assessing tenders.

**RESOLVED that the Committee's comments as set out above be fed in to the 2017/18 Annual Governance Statement.**

### **Work Programme**

Members proposed that three meetings a year be timetabled, and commented that they wished to examine the Council's whistle-blowing procedures at their next meeting.

**RESOLVED that three meetings per annum be included in the Council's Programme of Meetings.**

### **15 LOCAL GOVERNMENT ACT 1972 AS SUBSEQUENTLY AMENDED**

**RESOLVED that the Press and public be excluded during consideration of the items of business referred to below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of exempt information.**

**The following summary  
refers to matters  
involving exempt information**

### **16 MONITORING OFFICER'S GENERAL REPORT - APPENDIX D: COMPLAINTS**

The Committee considered a part 2 appendix containing details of complaints received about individual councillors.

As this was the last meeting before the local elections, the Chairman offered his thanks to everyone present for their work.

The Meeting ended at 9.12 pm

Chairman

Report No.  
CSD19020

London Borough of Bromley

PART ONE - PUBLIC

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**Decision Maker:**       **STANDARDS COMMITTEE**

**Date:**                   **Tuesday 22 January 2019**

**Decision Type:**       Non-Urgent                   Non-Executive                   Non-Key

**Title:**                   **ANNUAL GOVERNANCE STATEMENT**

**Contact Officer:**     Graham Walton, Democratic Services Manager  
Tel: 0208 461 7743   E-mail: [graham.walton@bromley.gov.uk](mailto:graham.walton@bromley.gov.uk)

**Chief Officer:**       Mark Bowen, Director of Corporate Services

**Ward:**                   All

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1.   Reason for report

- 1.1 Each year the Council must prepare an Annual Governance Statement (AGS) which forms a part of the Council's statutory accounts. Comments are sought from this Committee to inform the new statement for the 2018/19 financial year. The final version of the 2017/18 AGS is attached to this report as the basis for development of the new statement.
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2.   **RECOMMENDATION**

**That the Committee provides comments for the 2018/19 Annual Governance Statement.**

## Impact on Vulnerable Adults and Children

1. Summary of Impact: Not applicable
- 

## Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Excellent Council:
- 

## Financial

1. Cost of proposal: No Cost:
  2. Ongoing costs: Not Applicable:
  3. Budget head/performance centre: Democratic Services
  4. Total current budget for this head: £350,650
  5. Source of funding: General Fund
- 

## Personnel

1. Number of staff (current and additional): 6.79 FTE
  2. If from existing staff resources, number of staff hours: Not applicable
- 

## Legal

1. Legal Requirement: Statutory Requirement: Accounts and Audit Regulations (England) 2015
  2. Call-in: Not Applicable:
- 

## Procurement

1. Summary of Procurement Implications: Not applicable
- 

## Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Not applicable
- 

## Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: Not applicable

### 3. Background

- 3.1 The Accounts and Audit Regulations (England) 2015 require the Council to conduct, at least Annually, a review of the effectiveness of its system of internal control and to approve an Annual Governance Statement (AGS), prepared in accordance with proper practices in relation to internal control.
- 3.2 The Council must assure itself that its internal control environment is effective. Regulation 3 of the Accounts and Audit Regulations 2015, requires audited bodies to ensure that they have a sound system of internal control which:
- (a) facilitates the effectiveness of its functions and the achievement of its aims and objectives;
  - (b) ensures that the financial management and operational management of the authority is effective; and
  - (c) includes effective arrangements for the management of risk.
- Regulation 6 requires that each financial year, the authority must:
- (a) conduct a review of the effectiveness of the system of internal control; and
  - (b) Prepare an Annual Governance Statement.
- 3.3 The AGS must be prepared in accordance with proper practices as defined in the CIPFA publication “Delivering Good Governance in Local Government: Framework 2016”. The guidance outlines seven core principles of governance focusing on the systems and processes for the direction and control of the Council and its activities whereby it engages with and leads the community. There is no prescribed format.
- 3.4 The annual review and development of the Annual Governance Statement is undertaken by the Internal Audit Team in consultation with the Corporate Leadership Team, and includes input from the Monitoring Officer, Section 151 Officer, Democratic Services Manager and Corporate Risk Management Group.
- 3.5 The assurance framework sets out the sources of assurance that are relied upon on to enable preparation of the Annual Governance Statement. These include the work of Internal Audit, and of directors and managers within the Council who have responsibility for the development and maintenance of the internal control environment. It also includes the comments made by the external auditors and other review agencies and inspectorates. The Head of Audit opinion set out in the internal audit annual report forms a key element of the review.
- 3.6 The timetable for the production of the 2018/19 AGS is set out in Appendix A; the 2017/18 AGS is at Appendix B.

<b>Non-Applicable Sections:</b>	Impact on Children and Vulnerable Adults/Policy/ Financial/Personnel/Legal/Procurement
Background Documents: (Access via Contact Officer)	None

**Annual Governance Statement 2018/19 - Timetable**

<b>Action</b>	<b>By when (2019)</b>
2017/18 Annual Governance Statement presented to Standards Committee	22 <sup>nd</sup> January
2017/18 Annual Governance Statement sent to relevant departments to update wording 2018/19 Assurance Statements sent to Corporate Leadership Team members	8 <sup>th</sup> February (Confirmed agenda item 5 <sup>th</sup> February meeting)
Departmental Assurance Statements signed by members of Corporate Leadership Team	1 <sup>st</sup> March
Draft Annual Governance Statement to Corporate Leadership Team	5 <sup>th</sup> April (Confirmed agenda item 2 <sup>nd</sup> April meeting)
Draft Annual Governance Statement agreed by Corporate Risk Management Group	3 <sup>rd</sup> May (meeting arranged 1 <sup>st</sup> May)
Any revisions to wording of Annual Governance Statement finalised	17 <sup>th</sup> May
Draft Annual Governance Statements submitted to Technical and Control	Deadline 31 <sup>st</sup> May
Annual Governance Statement to Audit Sub Committee for approval	4 <sup>th</sup> June (provisional)
2 x Annual Governance Statements signed by the Chief Executive and Leader of the Council and submitted to Technical and Control	28 <sup>th</sup> June
Annual Governance Action Plan completed and diarised for review in line with Audit Sub Committee Meetings	February 2020



# Annual Governance Statement 2017/18

## **FINAL**

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## 1. Executive Summary

The Leader of the Council and Chief Executive recognise the importance of having appropriate processes and controls in place to run the Council and ensure its services are delivered effectively.

The Council is required to produce an Annual Governance Statement (AGS) which describes how its corporate governance arrangements have been working. The Council's Audit Sub-Committee review the production of the AGS and considers and scrutinises the content.

Bromley is a Member led, commissioning authority, delivering services through whoever is best placed to provide quality and value for money to its residents, who are supported to manage their lives with the minimum of intervention from the Council. 'Building a Better Bromley' has contained the guiding principles for Bromley Council since 2004/05 and was amended in 2013 to reflect the Public Health and Wellbeing agenda as well as the priority to continue to invest in the economic wellbeing of the borough. Following public consultation, in 2016 Bromley Council updated and relaunched the priorities contained in the vision and strengthened links with key partner organisations to help deliver important outcomes for residents, businesses and visitors to Bromley.

### [Building a Better Bromley \(2016-2018\)](#)

Bromley's governance framework comprises the systems and processes, culture and values, by which the authority is directed and controlled, and the activities through which it accounts to, engages with and leads its community. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate services and value for money.

The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of Bromley's policies, aims and objectives; to evaluate the likelihood and potential impact of those risks being realised, and to manage them efficiently, effectively and economically.

The governance framework has been in place at Bromley for the year ended 31 March 2018 and up to the date of approval of the Leader's Foreword and Statement of Accounts.

The Council conducts an annual review of its governance arrangements, including the system of internal control. The purpose of the review is to provide assurance from a number of sources including Members, Chief Officers, internal and external audit, other review agencies and inspectorates that corporate governance arrangements are adequate and operating effectively; or where gaps are revealed, action is planned that will ensure effective governance in future.

With substantial additional savings to be made over the next four years, the financial situation continues to drive the future direction and work of the Council.

## 2. Significant Governance Issues

Overall, we can confirm that the Council has appropriate systems and processes in place to ensure that good governance is maintained in line with the 'Delivering Good Governance in Local Government Framework, 2016 Edition'. Whilst we are satisfied that these generally work and can be regarded as fit for purpose, we have identified a number of areas for improvement.

Progress made in dealing with the governance issues identified in the 2016/17 Annual Governance Statement is detailed on page 16.

The five areas detailed overleaf have been identified as requiring further work during 2018/19:

Governance Issue	Action	Lead Officer
<p><b>Finance</b> Capacity to make further budget savings and maintain frontline services. The Council has set a balanced budget for 2018/19 without a detrimental impact on key services. There are savings/income generating options required for 2019/20. However, there are significant challenges for 2020/21 and beyond</p>	<p>Work is ongoing to explore options to address the future years' budget gap through the four year forward planning arrangements.</p> <p>Draft 2018/19 budget and update on Council's financial strategy 2019/20 to 2021/22 report to Executive on 10<sup>th</sup> January 2018 identified the 'One Council' approach.</p> <p><a href="#">Draft 2018/19 Budget and update on Council's Financial Strategy 2019/20 to 2021/22</a></p>	<p><b>Director of Finance</b></p>
<p><b>Contract Management</b> Contract issues have been identified across the organisation in the last two years which have identified the need for strengthened control and management oversight</p>	<p><b>Contract Database</b> Authorisation system for tendering/change control</p> <p><b>Document Management System</b> Holds all contracts electronically and also Minutes of meetings, Change Control Notices (CCN), Waivers</p> <p><b>Training</b> Has been identified as a mandatory requirement for 'commissioners of services'. It consists of four modules (3 hours per module) with compulsory attendance on all four to complete the course.</p> <ul style="list-style-type: none"> <li>• Module 1 – Commissioning</li> <li>• Module 2 – Contracting process, engaging with the market (procurement)</li> <li>• Module 3 – Tender &amp; evaluation process</li> <li>• Module 4 – Award (Governance)</li> </ul> <p><b>Restructuring of the Commissioning Team</b> To improve Governance and Quality Assurance</p>	<p><b>Director of Commissioning</b></p>
<p><b>Performance Management</b> Further work is required to ensure a comprehensive understanding of the strengths and weaknesses of services provided; effective use of performance management information and robust quality assurance arrangements across the Council, building on the work undertaken in Children's Services</p>	<p>We will be launching an Adults Performance Framework during 2018/19 to compliment the new Children's Performance Management Framework launched in 2017/18. The Council will also be improving performance management arrangements more broadly across the Council.</p> <p><a href="#">Performance Reporting - Children's Services - covering report</a></p> <p><a href="#">Performance Index</a></p>	<p><b>Assistant Director, Strategy, Performance and Business Support</b></p>

Governance Issue	Action	Lead Officer
<b>Code of Corporate Governance</b> The Council's Code of Corporate Governance has not been updated to reflect the 2016 CIPFA /Solace guidance	A review of the Code will be undertaken to ensure that it reflects recommended practice	<b>Director of Corporate Services and Monitoring Officer</b>
<b>General Data Protection Regulations (GDPR)</b> Significant changes were required to ensure that the Council is compliant with the General Data Protection Regulations 2016 (GDPR) when introduced on the 25 <sup>th</sup> May 2018.	Following an independent review which provided a data protection compliance review and initial gap analysis, a project plan was created with actionable tasks for working towards GDPR compliance. Additional staff support and investment have been secured. The 25 <sup>th</sup> May 2018 was not a finish line and work is continuing on the project plan.  <a href="#">GDPR Regulations Executive Report 6<sup>th</sup> December 2017</a>	<b>Director of Corporate Services</b>

### 3. What is Corporate Governance?

#### 3.1 Definition

The CIPFA International Framework 'Good Governance in the Public Sector' defines governance as:-

*'The arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved'*

It also states that:-

*'To deliver good governance in the public sector, both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times'*

*'Acting in the public interest implies primary consideration of the benefits for society, which should result in positive outcomes for service users and other stakeholders'*

Governance is about how local government bodies ensure that they are doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner. It comprises the systems and processes, cultures and values, by which local government bodies are directed and controlled and through which they account to, engage with and, where appropriate, provide leadership to their communities.

Effective corporate governance and the capacity to lead and manage change are essential to meet the ever increasing challenges for the public sector. Good governance is important to all involved in local government and a key responsibility of the Chief Executive, the Leader of the Council and other statutory governance Chief Officers.

Our governance framework comprises the culture, values, systems and processes by which the Council is directed and controlled. It brings together an underlying set of legislative and regulatory requirements, good practice principles and management practice.

**Bromley Council recognises that:**

- ▶ Good governance leads to good management, good performance, good stewardship of public money, good public engagement and, ultimately, good outcomes for residents and service users
- ▶ Good governance enables an authority to pursue its vision effectively, as well as underpinning that vision with appropriate mechanisms for control and management of risk
- ▶ All authorities should aim to meet the standards of the best and governance arrangements should not only be sound, but also be seen to be sound

**3.2 The Principles**

**Principle A – Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law**

**How we do this**

- Having regard for the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership
- Being accountable for decisions to the public and co-operating fully with whatever scrutiny is appropriate to one’s office
- Commitment to promoting an anti-fraud and corruption culture evidenced through a detailed anti-fraud and corruption policy and ensuring fraud and corruption are dealt with effectively
- Adherence to ethical values and respect for the rule of law
- Creating a culture where statutory officers and other key post holders are able to fulfil their responsibilities

**Principle B – Ensuring openness and comprehensive stakeholder engagement**

**How we do this**

- Ensuring transparency of decisions supported by an effective scrutiny and challenge process
- Consulting with residents during the budget setting process for 2018/19 and beyond
- Demonstrating engagement with all groups of stakeholders to determine the most appropriate course of action/effective intervention
- Ensuring a clear, evidence based, decision making path

## Principle C – Defining outcomes in terms of sustainable, economic, social and environmental benefits

### How we do this

- Having a clear vision and strategy, with key partner organisations through 'Building a Better Bromley'
- Delivering defined, sustainable outcomes within the limits of resources and authority
- Balancing competing demands with finite resources when determining priorities; managing service users' expectations effectively with regard to determining priorities and making the best use of the available resources
- Taking a longer term view with regard to decision making, taking account of potential conflicts between the organisation's vision and short term factors such as financial constraints

## Principle D – Determining the interventions necessary to optimise the achievement of the intended outcomes

### How we do this

- Having a clear vision and strategy setting out our intended outcomes for citizens and service users
- Ensuring decision makers receive a robust best value option analysis detailing associated risks and outcomes to be achieved
- Considering stakeholder feedback and future impact when making decisions about service delivery, prioritising competing demands

## Principle E – Developing capacity including the capability of leadership and individuals

### How we do this

- Ensuring that the decision making process is clearly defined and supported by protocols to ensure a shared understanding of roles and objectives is maintained
- Ensuring Members and Officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities, reflecting the structure and diversity of the community
- Evaluating, and supporting, staff performance through regular reviews which take into account training and development needs
- Supporting the workforce to maintain their health and wellbeing

## Principle F – Managing risks and performance through robust internal control and strong public financial management

### How we do this

- Regular review of Corporate and Departmental Risks and Risk Registers
- Integration of effective risk management arrangements into the decision making process
- Ensuring an effective scrutiny function which provides a constructive challenge and allows for debate at all stages of the decision making process
- Ensuring effective counter fraud and anti-corruption policies are in place and there is good staff awareness
- Having an effective Audit Sub-Committee whose remit incorporates financial delegation, fraud prevention, internal and external audit

## Principle G – Implementing good practices in transparency, reporting, and audit to deliver effective accountability

### How we do this

- Publishing information on our activities and decisions
- Maintaining a rigorous, effective and transparent decision making and scrutiny process
- Ensuring that public reports are easily accessible and use a style appropriate to the intended audience
- Embracing peer challenge, reviews and inspections from regulatory bodies, implementing recommendations for corrective action as required
- Maintaining an effective internal and external audit service, with direct access to Members

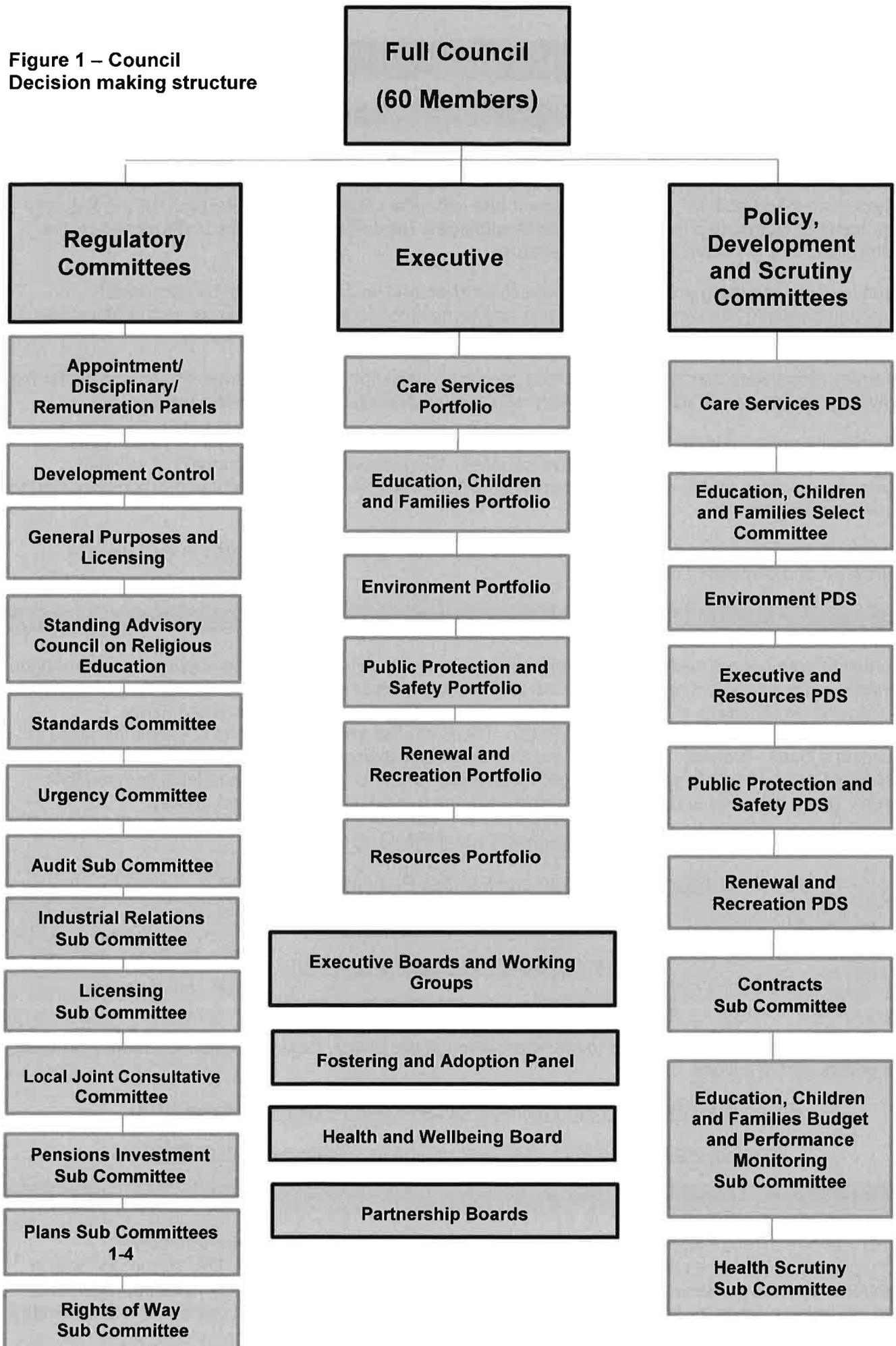
## 4. The Council - How it Works

This Annual Governance Statement covers the period 1<sup>st</sup> April 2017 to 31<sup>st</sup> March 2018.

The Council is made up of 60 Councillors with the decision making structure divided between Executive and non-Executive matters. Executive duties are carried out by an Executive body of Councillors, which includes six Councillors with specific Portfolio responsibilities. Non-Executive duties are performed by the Development Control Committee and the General Purposes and Licensing Committee.

The decision making structure is depicted overleaf:

**Figure 1 – Council Decision making structure**



## 5. Outcomes and Value for Money

### 5.1 Building a Better Bromley 2016-2018

Bromley Council will continue to reduce bureaucratic burdens whilst meeting its role in providing key services. An environment will be created where individuals and communities can thrive and where people can lead healthier, more independent and self-reliant lifestyles. This means that the authority can focus on supporting the Borough's most vulnerable residents with services underpinned by the principles of early intervention and prevention.

Bromley aims to create an environment where children and young people can be successful: supporting people into work; offering advice and signposting to self-help solutions, and working with partners to minimise crime and antisocial behaviour.

Bromley recognises that this activity cannot be done in isolation, so will continue strong support for the voluntary sector as well as working closely with outside bodies in the private and public sector.

Despite the unprecedented financial challenge, Bromley will serve and advocate on behalf of its residents and aim to deliver cost-effective services. Working with strategic partners, it will also continue to ensure that it receives the fairest deal from the Government on issues that are important to Bromley residents.

Bromley's achievements over the past year and plans for the future are reported in the Leader's Foreword and Statement of Accounts.

### 5.2 Portfolio Plans

Portfolio Plans set out each Portfolio Holder's aims in the current year and the supporting performance targets, using a range of national and local indicators. Overseeing the successful delivery of each plan is the joint responsibility of the Portfolio Holder and the Members of the appropriate Policy Development and Scrutiny Committee (PDS). The Portfolios are aligned to the priorities identified in Building a Better Bromley. In addition, the Health and Wellbeing Board is a collaboration between Bromley Council and various partner agencies whose role is to understand their local community's needs, agree priorities and encourage commissioners to work in a more joined up way.

[Care Services Portfolio Plan 2017/18](#)

[Education, Children and Families Portfolio Plan 2017/18](#)

[Environment Portfolio Plan 2017/18](#)

[Public Protection Portfolio Plan 2017/18](#)

[Renewal and Recreation Portfolio Plan 2017/18](#)

Updates on progress are reported to Members through the Policy, Development and Scrutiny process. Examples of this include:

[Environment Portfolio Plan - half year update covering report \(January 2018\)](#)

[Environment Portfolio Plan - half year update on progress \(January 2018\)](#)

### 5.3 Managing our Resources (Value for Money)

The Council's external auditors issued a qualified 'except for' conclusion on the authority's arrangements to secure value for money for 2016/17 on 27 September 2017. The 'except for' was in relation to Children's Services following the Ofsted rating of inadequate in 2015/16 as improvements had not been in place for the entirety of 2016/17. They issued an unqualified opinion on the authority's

financial statements on 27<sup>th</sup> September 2017. This means that they believe the financial statements give a true and fair view of the financial position of the Authority and of its expenditure and income for the year. The financial statements also include those of the pension fund.

The Council's external auditors 'External Audit Plan' for 2017/18 (published February 2018) states that:

'Our risk assessment regarding your arrangements to secure value for money has identified the following VFM significant risks to date:

- ▶ **Delivery of budgets:** As a result of reductions in central government funding and overspends in children's services, the Authority is having to identify savings beyond those from prior years. We will consider how the Authority identifies, approves, and monitors savings plans and how budgets are monitored throughout the year.
- ▶ **Findings from regulatory bodies:** As a result of the Ofsted inspection in June 2016 children's services were rated as 'inadequate'. We will review the Council's continuing response to this review and the progress that has been made. We will consider the results of any recent reports from Ofsted'.

The external auditors have therefore stated that the 2017/18 review will incorporate:

- ▶ 'The Controls the Authority has in place to ensure financial resilience, specifically that the Medium Term Financial Plan has duly taken into consideration factors such as funding reductions, salary and general inflation, demand pressures, restructuring costs and sensitivity analysis given the degree of variability in the above factors'.
- ▶ 'The Council's continuing response to the Ofsted report including how the Council is working with the Commissioner to improve services. We will consider how the approach to improving services is being managed across the Authority, for example, whether there is an appropriate amount of Senior Manager and Councillor oversight of issues. We will also consider the results of any recent relevant reports from Ofsted or similar bodies'.

The Budget Strategy for 2018/19 has been set within the context of a reducing resource base, with Government funding reductions likely to continue beyond 2020 – the on-going need to reduce the size and shape of the organisation to secure priority outcomes within the resources available. There is also a need to build in flexibility in identifying options to bridge the budget gap, as the gap could increase further. The overall strategy has to be set in the context of the national state of public finances, with austerity continuing given the level of public sector debt, and the high expectation from Government that services should be reformed and redesigned with devolution contributing to the transformation of local government.

The Council has had to take significant action to reduce the cost base while protecting priority front line services and providing sustainable longer term solutions.

Council Tax has been kept low compared with other Councils. A combination of front loading of savings in previous years, pro-actively generating investment income and prudent financial management have provided an opportunity to provide a balanced budget for next year with potential opportunity to balance the budget in 2019/20, assuming any further cost pressures are contained and relentless cost control is undertaken.

There will be significant challenges as the Council is a low cost authority and the position will need to be regularly reviewed, particularly as there are risks relating to recent increases in inflation compared with the previous year's forecast, and further cost pressures/new burdens. Apart from early identification of options to address the future years' budget gap (2020/21 and beyond), including any significant transformation and income generating opportunities, it remains essential that Chief Officers identify mitigating action to address any in year cost pressures/new burdens to remain within their 'cash envelope'.

Stewardship and delivering sustainable finances are increasingly important whilst the Government's austerity measures continue. It is important to consider actions now that address the "budget gap" in the medium term.

The Council's prudent approach to identify and deliver front loading efficiency savings, together with being debt free and having healthy reserves, places the Council in a stronger position to respond to the challenges that will undoubtedly arise. The strategy needs to remain flexible and the Council's reserves resilient to respond to the impact of volatile external events and the structural budget deficit during this austerity period.

## 6. How do we know our arrangements are working?

### 6.1 The Role of Management

The Corporate Leadership Team are responsible for the Strategic Leadership of the organisation, with managers having day to day responsibility for the management and control of service delivery. Our managers set the 'tone from the top' and develop and implement policies, procedures, processes and controls. They ensure compliance.

The Corporate Risk Management Group (CRMG), chaired by the Director of Finance and including the Head of Audit in its membership, oversees the Council's governance arrangements and delivery of the Annual Governance Statement.

This year, Internal Audit commissioned Zurich, in their capacity as the Authority's insurers, to carry out a 'check and challenge' exercise on the departmental Risk Registers. The aim of this was to provide the Departmental Management Teams (DMT) and the Corporate Leadership Team (CLT) with an independent discussion on risk and one which challenged, refreshed and validated the current risk register content.

Zurich attended the October 2017 Corporate Risk Management Group (CRMG) meeting to discuss their findings and recommendations prior to the Corporate Leadership Team's approval of each refreshed Risk Register and presentation of the same to Audit Sub Committee on 8<sup>th</sup> November 2017. Each Risk Register was then submitted to the most appropriate Policy Development and Scrutiny Committee/Sub Committee for scrutiny.

This year, a review of our governance arrangements was undertaken by Internal Audit, overseen by the Corporate Risk Management Group. The outcome of this is that we have adequate governance arrangements in place and relevant to the environment we work in. The review suggested a number of improvements in the areas of performance management and the Council's Code of Corporate Governance (having not been updated to reflect the 2016 CIPFA/Solace guidance). However, in practice, the code consists of a number of codes and documents which can be regarded as fit for purpose in accordance with the governance framework.

### 6.2 The Role of the Audit Committee

The Council has appointed an Audit Sub-Committee which considers financial delegations, fraud prevention, internal and external audit. It is a sub-committee of the General Purposes and Licensing Committee and meets three times a year.

#### [Audit Sub Committee Meetings \(Agendas, Papers, Minutes\)](#)

The Audit Sub-Committee plays an important role in ensuring that the Council learns from Internal Audit findings and rectifies identified weaknesses in control. All Priority One recommendations from Internal Audit are tracked by the Committee until implemented.

## 6.3 Our Governance Framework

Key Policies/Processes/Posts/Functions in our Governance Framework include:

	Policy/Process	
<b>A</b>	Annual Audit Letter	
	Annual Governance Statement	
	Anti-Fraud and Corruption Strategy	
	Audit Sub Committee	
<b>B</b>	Building a Better Bromley	
<b>C</b>	Capital Strategy	
	Code of Conduct for Members	
	Communications Strategy	
	Complaints System	
	Constitution	
	Contract Procedure Rules/Standing Orders	
	Corporate Induction Process	
	Corporate Leadership Team	
	Corporate Operating Principles	
	Customer Access Channel Strategy	
	Customer Services Charter	
	<b>D</b>	DISCUSS Appraisal Scheme
	<b>E</b>	Executive and Resources PDS Committee Annual Report
	<b>F</b>	Financial Regulations
		Financial Strategy
Forward Plan of Key Decisions		
<b>G</b>	'Getting it Right – Complaints, Compliments and Suggestions	
	Gifts and Hospitality Code of Conduct	
<b>H</b>	Head of Audit	
	Head of Paid Service	
<b>I</b>	Internal and External Audit Reports	
	Internal Audit Opinion and Annual Report	
	Internal Controls	
	IT Governance	
<b>L</b>	Leader's Foreword and Statement of Accounts	
	Learning and Development	
	Local Development Framework	
<b>M</b>	Member/Officer Protocol	
	Monitoring Officer (Director of Corporate Services)	
<b>P</b>	Portfolio Plans	
	Public Consultations/Meetings	
<b>R</b>	'Raising Concerns' whistle blowing	
	Register of Interests	
	Risk Management Strategy	
<b>S</b>	Scheme of Delegation	
	Section 151 Officer (Director of Finance)	
	Statement of Accounts	
<b>T</b>	Treasury Management Strategy	

## 6.4 Annual Governance Assurance Statement

Each member of the Corporate Leadership Team is required to confirm that:

**'In meeting my responsibilities above, I have:**

- ▶ Contributed to the review of Risk Registers and the outcomes
- ▶ Ensured that there are controls in place to mitigate the risks highlighted in the above exercise
- ▶ Considered relevant assessments of key service areas within the Department  
e.g. benchmarking, peer review
- ▶ Taken into account internal and external audit and inspection reports and results of follow ups regarding implementation of recommendations

**I am satisfied that to the best of my knowledge the following procedures are in place:**

- ▶ The service is planned and managed in accordance with the Council's Corporate Operating Principles
- ▶ Business risks are identified, assessed and reported on a regular basis
- ▶ Key controls over systems and processes are in place to ensure the Council's assets are safeguarded
- ▶ Business Continuity Plans are maintained and reviewed as circumstances change
- ▶ The monthly Cumulative Spend Report has been reviewed and agreed as part of the Full Budget Monitoring System
- ▶ Key contract information is kept up to date in the Contracts Database to allow Contract Registers and other management information to be reported

Where unable to confirm all, or some of these, the areas for improvement and planned actions must be detailed.

## 6.5 External Inspections/Peer Reviews

During the last year the Council has received the following assessments from other Inspectorates, agencies or Peer Reviews:

- The London Association of Directors of Social Services (ADASS) Peer Review of Bromley – Use of Resources (22<sup>nd</sup> – 24<sup>th</sup> November 2017).  
[ADASS Peer Review - Use of Resources](#)
- Ofsted – sixth monitoring visit (13<sup>th</sup> and 14<sup>th</sup> March 2018).  
[Press release 20th April 2018](#)  
[Ofsted sixth monitoring visit](#)
- CQC review of Health Services for Children Looked After and Safeguarding in Bromley (16<sup>th</sup> – 20<sup>th</sup> October 2017, published 29<sup>th</sup> January 2018).  
[Health Services for Children Looked After and Safeguarding](#)

- Food Standard Agency audit of the food hygiene service (24<sup>th</sup> April 2017).  
[Food Standards Agency - audit of food hygiene service delivery Committee Report](#)  
[FSA report](#)  
[Action Plan](#)  
[Executive Report - additional resources](#)  
[Executive Report - additional resources - minutes](#)

## 6.6 The Role of Internal Audit

Internal Audit provides independent and objective assurance to the Council through its Audit Sub-Committee, to support them in discharging their responsibilities under S151 of the Local Government Act 1972, relating to the proper administration of the Council's financial affairs, and is a key component of Corporate Governance within the Council.

An independent Internal Audit function will, through its risk-based approach to work, provide assurance to the Council's Audit Sub-Committee and senior management on the higher risk and more complex areas of the Council's business, allowing management to focus on providing coverage of routine operations.

Internal Audit's objectives include supporting a positive culture of internal control improvement, effective risk management and good governance. The purpose, authority and responsibility of the internal audit activity are formally defined in the Internal Audit Charter, which will be periodically reviewed and presented to senior management and the Audit Sub-Committee for approval.

## 6.7 The Role of the Head of Audit and Opinion on Governance Risk and Control

The Council is responsible for ensuring that it has a sound system of governance (incorporating the system of internal control).

The Head of Audit is required to provide an independent opinion on the overall adequacy of the effectiveness of the Council's governance, risk and control framework. Their Annual Report and Opinion has been considered and any significant issues incorporated as a result.

From the work undertaken during 2017/18, reasonable assurance can be provided that there is generally a sound system of internal control, designed to meet the Council's objectives and that controls are applied consistently. Where weaknesses are identified, i.e. Limited Assurance reports and Priority One recommendations are made; these are tracked by the Corporate Leadership Team and the Audit Sub Committee until implemented or discharged.

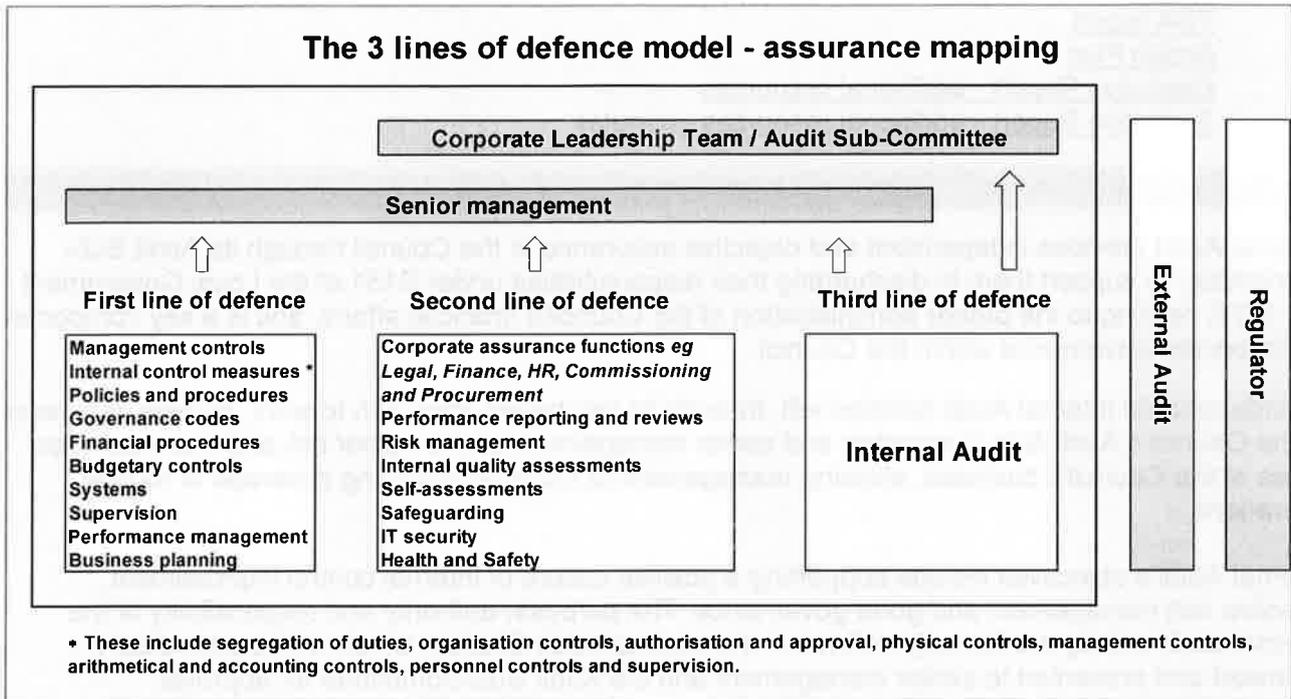
## 7. Our Strategic Risks

The Accounts and Audit Regulations require the Council to undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account the Public Sector Internal Auditing Standards (PSIAS) or guidance. Internal audit is a key component of corporate governance within the Council. The three lines of defence model, as detailed below, provides a simple framework for understanding the role of internal audit in the overall risk management and internal control processes of an organisation.

- ▶ First line – operational management controls
- ▶ Second line – monitoring controls, e.g. the policy or system owner / sponsor
- ▶ Third line – independent assurance

The Council's third line of defence includes Internal Audit, who should provide independent assurance to senior management and the Audit Sub-Committee on how effectively the first and second lines of defence have been operating.

**Figure 2 – 3 Lines of Defence Model**



Risk management is an important element of the system of internal control at Bromley Council. It is based on a process designed to identify, prioritise and control the risks to achieving Bromley’s policies, aims and objectives.

The Corporate Risk Register (CRR) is a key document in the Council’s approach to risk management; it captures the key strategic risks to the delivery of the corporate objectives as set out in the ‘Building a Better Bromley’ vision. It also provides a context through which high level risks are identified and is used to inform decision making about business planning and service delivery. Chief Officers assume the lead role for Strategic Risks affecting their own service areas with the Corporate Risk Register reviewed at least annually. The Corporate Risk Management Group takes the lead in championing and co-ordinating the Council’s approach to risk management, and ensures that effective risk management processes are fully embedded.

The current Corporate Risk Register can be viewed by following the link

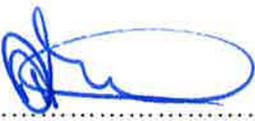
[Corporate Risk Register](#)

## 8. Looking Back on 2016/17

Governance Issue	Actions	Progress
Capacity to make further budget savings and maintain frontline services: The Council will need to make significant savings of around £24m per annum by 2020/21.	The Executive is working to balance the budget for 2017/18. Where possible identified savings will be taken as early as possible. We continue to retain four year forward planning.	The Executive have achieved a balanced budget for 2018/19 and there are options to balance the budget for 2019/20 without a detrimental impact on key services. Work is ongoing to explore options to address the future years' budget gap through the four year forward planning arrangements.
Commissioning and transformation agenda	The Commissioning Team will continue to identify services that are either standalone or can be bundled together and then seek approval to market test or other options.	Officers have, and will continue, to review all services to identify more efficient ways of commissioning and to contribute to the Council's budget gap.

To the best of our knowledge, the governance arrangements as defined above, have been operating effectively during the year.

We propose to take steps over the coming year to address the Significant Governance Issues defined on Page 3 and 4 to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

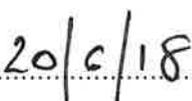
Signed.....  


Chief Executive

Signed.....  


Leader of the Council

Date.....  


Date.....  


## 9. Appendix 1 – Links to Documents

<b>Page 2</b>	<b>Building a Better Bromley (2016-2018)</b>
<a href="http://www.bromley.gov.uk/downloads/file/2005/building_a_better_bromley">http://www.bromley.gov.uk/downloads/file/2005/building_a_better_bromley</a>	
<b>Page 3</b>	<b>Draft 2018/19 Budget and update on Council's Financial Strategy 2019/20 to 2021/22</b>
<a href="http://cds.bromley.gov.uk/documents/s50056259/Executive%20100118%20Draft%20Budget%20Report.pdf">http://cds.bromley.gov.uk/documents/s50056259/Executive%20100118%20Draft%20Budget%20Report.pdf</a>	
<b>Page 3</b>	<b>Performance Reporting - Children's Services - covering report</b>
<a href="http://cds.bromley.gov.uk/documents/s50059461/Performance%20Reporting%20-%20Childrens%20Services.pdf">http://cds.bromley.gov.uk/documents/s50059461/Performance%20Reporting%20-%20Childrens%20Services.pdf</a>	
<b>Page 3</b>	<b>Performance Index</b>
<a href="http://cds.bromley.gov.uk/documents/s50059462/App.%20to%20Performance%20Reporting%20-%20Childrens%20Services.pdf">http://cds.bromley.gov.uk/documents/s50059462/App.%20to%20Performance%20Reporting%20-%20Childrens%20Services.pdf</a>	
<b>Page 4</b>	<b>GDPR Regulations Executive Report 6th December 2017</b>
<a href="http://cds.bromley.gov.uk/documents/b50011952/10.%20THE%20GENERAL%20DATA%20PROTECTION%20REGULATIONS%202016%20Wednesday%2006-Dec-2017%2019.00%20Executive.pdf?T=9">http://cds.bromley.gov.uk/documents/b50011952/10.%20THE%20GENERAL%20DATA%20PROTECTION%20REGULATIONS%202016%20Wednesday%2006-Dec-2017%2019.00%20Executive.pdf?T=9</a>	
<b>Page 9</b>	<b>Care Services Portfolio Plan 2017/18</b>
<a href="http://www.bromley.gov.uk/downloads/file/1741/care_services_portfolio_plan">http://www.bromley.gov.uk/downloads/file/1741/care_services_portfolio_plan</a>	
<b>Page 9</b>	<b>Education, Children and Families Portfolio Plan 2017/18</b>
<a href="http://www.bromley.gov.uk/downloads/file/1796/education_children_and_families_portfolio_plan">http://www.bromley.gov.uk/downloads/file/1796/education_children_and_families_portfolio_plan</a>	
<b>Page 9</b>	<b>Environment Portfolio Plan 2017/18</b>
<a href="http://cds.bromley.gov.uk/documents/s50051289/Appendix%201%20for%20Environment%20Portfolio%20Plan.pdf">http://cds.bromley.gov.uk/documents/s50051289/Appendix%201%20for%20Environment%20Portfolio%20Plan.pdf</a>	
<b>Page 9</b>	<b>Public Protection Portfolio Plan 2017/18</b>
<a href="http://cds.bromley.gov.uk/documents/s50051026/Enc.%201%20for%20Draft%20Portfolio%20Plan%20PPS.pdf">http://cds.bromley.gov.uk/documents/s50051026/Enc.%201%20for%20Draft%20Portfolio%20Plan%20PPS.pdf</a>	

<b>Page 9</b>	<b>Renewal and Recreation Portfolio Plan 2017/18</b>
<a href="http://cds.bromley.gov.uk/documents/s50051160/Appendix1%20RENEWAL%20AND%20RECREATION%20PORTFOLIO%20PLAN%20201718.pdf">http://cds.bromley.gov.uk/documents/s50051160/Appendix1%20RENEWAL%20AND%20RECREATION%20PORTFOLIO%20PLAN%20201718.pdf</a>	
<b>Page 9</b>	<b>Environment Portfolio Plan - half year update covering report (January 2018)</b>
<a href="http://cds.bromley.gov.uk/documents/s50056769/Environment%20Portfolio%20Plan%20201720%20Half-Year%20Progress%20Report.pdf">http://cds.bromley.gov.uk/documents/s50056769/Environment%20Portfolio%20Plan%20201720%20Half-Year%20Progress%20Report.pdf</a>	
<b>Page 9</b>	<b>Environment Portfolio Plan - half year update on progress (January 2018)</b>
<a href="http://cds.bromley.gov.uk/documents/s50056770/Appendix%20for%20Environment%20Portfolio%20Plan%20201720%20Half-Year%20Progress%20Report.pdf">http://cds.bromley.gov.uk/documents/s50056770/Appendix%20for%20Environment%20Portfolio%20Plan%20201720%20Half-Year%20Progress%20Report.pdf</a>	
<b>Page 11</b>	<b>Audit Sub Committee Meetings (Agendas, Papers, Minutes)</b>
<a href="http://cds.bromley.gov.uk/ieListMeetings.aspx?CId=135&amp;Year=0">http://cds.bromley.gov.uk/ieListMeetings.aspx?CId=135&amp;Year=0</a>	
<b>Page 13</b>	<b>ADASS Peer Review - Use of Resources</b>
<a href="http://cds.bromley.gov.uk/documents/s50059178/ADASS%20Peer%20Review%20of%20Bromley%20-%20Use%20of%20Resources.pdf">http://cds.bromley.gov.uk/documents/s50059178/ADASS%20Peer%20Review%20of%20Bromley%20-%20Use%20of%20Resources.pdf</a>	
<b>Page 13</b>	<b>Press release 20<sup>th</sup> April 2018</b>
<a href="http://www.bromley.gov.uk/press/article/1373/bromley_early_intervention_service_is_jewel_in_the_crown">http://www.bromley.gov.uk/press/article/1373/bromley_early_intervention_service_is_jewel_in_the_crown</a>	
<b>Page 13</b>	<b>Ofsted sixth monitoring visit</b>
<a href="https://reports.ofsted.gov.uk/sites/default/files/documents/local_authority_reports/bromley/070_Bromley_Monitoring%20visit%20of%20LA%20childrens%20services.pdf">https://reports.ofsted.gov.uk/sites/default/files/documents/local_authority_reports/bromley/070_Bromley_Monitoring%20visit%20of%20LA%20childrens%20services.pdf</a>	
<b>Page 13</b>	<b>Health Services for Children Looked After and Safeguarding</b>
<a href="http://www.cqc.org.uk/sites/default/files/20180129_clas_bromley_final_report.pdf">http://www.cqc.org.uk/sites/default/files/20180129_clas_bromley_final_report.pdf</a>	
<b>Page 14</b>	<b>Food Standards Agency - audit of food hygiene service delivery Committee Report</b>
<a href="http://cds.bromley.gov.uk/documents/s50051118/Food%20Standards%20Agency%20Report.pdf">http://cds.bromley.gov.uk/documents/s50051118/Food%20Standards%20Agency%20Report.pdf</a>	

<b>Page 14</b>	<b>FSA report</b>
<a href="http://cds.bromley.gov.uk/documents/s50051119/FSA-Enc%201.pdf">http://cds.bromley.gov.uk/documents/s50051119/FSA-Enc%201.pdf</a>	
<b>Page 14</b>	<b>Action Plan</b>
<a href="http://cds.bromley.gov.uk/documents/s50051120/Enc2.pdf">http://cds.bromley.gov.uk/documents/s50051120/Enc2.pdf</a>	
<b>Page 14</b>	<b>Executive Report - additional resources</b>
<a href="http://cds.bromley.gov.uk/documents/s50051984/Additional%20Resources%20for%20Environment%20Community%20Services.pdf">http://cds.bromley.gov.uk/documents/s50051984/Additional%20Resources%20for%20Environment%20Community%20Services.pdf</a>	
<b>Page 14</b>	<b>Executive Report - additional resources - minutes</b>
<a href="http://cds.bromley.gov.uk/documents/g6245/Printed%20minutes%20Wednesday%2009-Aug-2017%2009.00%20Executive.pdf?T=1">http://cds.bromley.gov.uk/documents/g6245/Printed%20minutes%20Wednesday%2009-Aug-2017%2009.00%20Executive.pdf?T=1</a>	
<b>Page 15</b>	<b>Corporate Risk Register</b>
<a href="http://cds.bromley.gov.uk/documents/s50060593/Appendix%20B.%20Corporate%20Risk%20Register.pdf?CT=2">http://cds.bromley.gov.uk/documents/s50060593/Appendix%20B.%20Corporate%20Risk%20Register.pdf?CT=2</a>	

Report No.  
CSD19010

London Borough of Bromley

PART ONE - PUBLIC

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**Decision Maker:**       **STANDARDS COMMITTEE**

**Date:**                   **Tuesday 22 January 2019**

**Decision Type:**       Non-Urgent                   Non-Executive                   Non-Key

**Title:**                   **MONITORING OFFICER'S GENERAL REPORT**

**Contact Officer:**       Graham Walton, Democratic Services Manager  
Tel: 0208 461 7743   E-mail: graham.walton@bromley.gov.uk

**Chief Officer:**       Mark Bowen, Director of Corporate Services

**Ward:**                   All

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1.   Reason for report

1.1 To update the Committee on a number of standards issues -

- Independent Persons
  - Whistle-blowing procedures
  - Committee for Standards in Public Life
  - Dispensations Granted
  - Gifts and Hospitality Register
  - Register of Interests
  - Work Programme
  - Complaints (see part 2 appendix)
- 

2.   **RECOMMENDATIONS**

**That the Committee -**

**(1) Considers and notes the Monitoring Officer's Report.**

**(2) Comments on whether a replacement Independent Person should be appointed (paragraphs 3.1/3.2.)**

**(3) Comments on whether the Mayor's Consort, if a serving Councillor, should be required to declare gifts and hospitality received when acting in the role of consort (paragraph 3.7.)**

**(4) Considers its future work programme (paragraphs 3.9/3.10.)**

### Impact on Vulnerable Adults and Children

1. Summary of Impact: Not applicable
- 

### Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Excellent Council:
- 

### Financial

1. Cost of proposal: No Cost:
  2. Ongoing costs: Not Applicable:
  3. Budget head/performance centre: Democratic Representation
  4. Total current budget for this head: £1,067,960
  5. Source of funding: 2018/19 revenue budget
- 

### Personnel

1. Number of staff (current and additional): Not applicable
  2. If from existing staff resources, number of staff hours: Not applicable
- 

### Legal

1. Legal Requirement: Statutory Requirement: Local Government Acts 1972, 2000 and subsequent legislation.
  2. Call-in: Not Applicable: This report does not involve an executive decision.
- 

### Procurement

1. Summary of Procurement Implications: Not applicable
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The standards system has the potential to impact on any person who has contact with a Member of Bromley Council where that person considers that the Member has breached the Code of Conduct.
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: Not applicable.

### **3. COMMENTARY**

#### **Independent Persons**

- 3.1 Every principal local authority must appoint at least one independent person to be consulted by the authority or by members of the authority on standards issues. Mr Nicholas Marcar has recently resigned as an Independent Person, leaving the Council with just one Independent Person, Dr Simon Davey. The changes to the Standards system brought about by the Localism Act 2011 have greatly reduced the involvement of Independent Persons compared to the former arrangements where there were several co-opted members of the Standards Committee, a need for frequent Sub-Committee meetings and the Chairman was an co-opted member. However, it is still useful to have two Independent Persons, not only to have a broader input at Committee meetings, but so that different parties on a particular issue are not dependent on the same person for independent advice and also to avoid conflicts of interest. Should Dr Davey also resign, the authority could potentially be without an Independent Person for a period.
- 3.2 The Committee's views are sought on the following potential courses of action -
- To continue with just one Independent Person
  - To advertise for a new Independent Person to replace Mr Marcar
  - To explore the possibility of sharing Independent Persons with a neighbouring authority.

#### **Whistle-blowing procedures**

- 3.3 The Council's whistle-blowing policy is called "Raising Concerns" and is available on the Council's website and intranet. The policy directs staff with concerns that they feel they cannot raise with their managers firstly to the Director of Corporate Services or the Head of Audit, or alternatively to the Chief Executive or the Chairman and Vice-Chairman of the Audit Sub-Committee. A copy of the policy is attached as [Appendix 1](#).

#### **Committee for Standards in Public Life**

- 3.4 At its last meeting on 22<sup>nd</sup> February 2018 the Committee provided some comments for a public consultation on local government ethical standards being carried out by the Committee on Standards in Public Life. The Committee's submission, which focussed on the need for a range of effective sanctions to be available for Standards Committees where there were breaches of the Code of Conduct, is attached at [Appendix 2](#). The report of the Committee on Standards in Public Life is expected to be published on 30<sup>th</sup> January 2019 and any significant issues will be reported to the next meeting.

#### **Dispensations Granted**

- 3.5 The Council has delegated to the Monitoring Officer, in consultation with members of the Urgency Committee, the authority to grant dispensations to Councillors to attend and speak at meetings of the authority in circumstances where, under the Code of Conduct, they have a disclosable pecuniary interest (Scheme of Delegation to Officer, Part 2A, 3 (xxv)). Where these dispensations have been sought, they are typically about town planning issues, where the Code of Conduct means that councillors have less opportunity to assert their interests than other residents, or about employment, where technically there is a disclosable pecuniary interest, but in practice that interest is not significant. In order to be transparent, applications for dispensations since the delegation was first made are listed in [Appendix 3](#). It is proposed that future dispensations are reported at each meeting of this Committee.

## Gifts and Hospitality Register

- 3.6 Under the Code of Conduct, Councillors are required to declare gifts and hospitality received due to their role as Councillors over the value of £25. These are published on the Council website. At its last meeting the Committee requested an annual update on Gifts and Hospitality declarations, and a schedule of the gifts and hospitality received since then is attached as [Appendix 4](#). Declarations have been registered by 14 serving Members; 46 members have not declared any gifts or hospitality in this period.
- 3.7 One issue that has arisen since the Committee's last meeting relates to declarations made by the Mayor and the Mayor's Consort. Gifts and hospitality received by the Mayor in the course of his or her role are not normally declared in the Gifts and Hospitality Register (although they are recorded by the Mayor's Office.) This year, the Mayor's Consort is also a Councillor, Councillor Mike Botting, so there is a question that does not usually arise about whether he needs to record gifts and hospitality received during his role as Consort (as differentiated from his role as a Councillor). The approach taken so far is that he has declared gifts and hospitality received when acting as Consort, but the Committee's views are sought on whether this is necessary.

## Register of Interests

- 3.8 Under the Localism Act 2011, the Register of Interests is required to be published on the Council's website, and a link to each Councillor's declaration is provided on their page. At its last meeting the Committee suggested that a print-out of these declarations should be available at each meeting of the Committee for inspection by members of the public, and this will be done.

## Work Programme

- 3.9 At its last meeting, the Committee suggested that it should have three meetings a year scheduled in the Council's programme of meetings. The 2019/20 programme of meetings is being prepared for approval by the General Purposes and Licensing Committee at its meeting on 12th February 2019. The following dates have provisionally been scheduled -
- Thursday 11<sup>th</sup> July 2019
  - Thursday 31<sup>st</sup> October 2019
  - Thursday 12<sup>th</sup> March 2020
- 3.10 Members of the Committee are also requested to consider what issues they wish to consider at future meetings.

## Complaints (see [Appendix 5](#) - part 2)

- 3.11 A summary of recent complaints against Councillors, since the Committee's last meeting, is included on the part 2 agenda, as these complaints contain personal details about Councillors and complainants, and also the Councillors concerned have not necessarily done anything that is clearly against the Code of Conduct.

<b>Non-Applicable Sections:</b>	Impact on Vulnerable Adults and Children/Policy/ Financial/personnel/Legal/Procurement
Background Documents: (Access via Contact Officer)	None

## RAISING CONCERNS (WHISTLEBLOWING) POLICY

### INTRODUCTION

1. Employees are often the first to realise that there may be something wrong within the Council. Usually these concerns are easily resolved. However, when the concern feels serious because it is about a possible fraud, corruption or misuse of position that might affect others or the council itself, it can be difficult to know what to do.
2. You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the Council. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.
3. The Public Interest Disclosure Act provides workers with protection from dismissal or other damage as a result of making a disclosure of information in the public interest about wrongdoing at work. The Chief Executive, Chief Officers and Members are committed to adhering to the Public Interest Disclosure Act and to provisions contained therein. Provided you are acting honestly and reasonably believe it to be in the public interest, it does not matter if you are mistaken.
4. The Council is committed to running the organisation in the best way possible and to do so we need your help. We have introduced this policy to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.
5. This Raising Concerns Policy is intended to encourage and enable employees and members to raise serious concerns. This policy applies to all those who work for us; whether full-time or part-time, employed through an agency, contractors or as a volunteer. If you have a concern, please let us know.
6. These procedures are in addition to the Council's complaints procedures and other statutory reporting procedures applying to some departments. If, however, you wish to make a complaint about your employment or how you have been treated, please use the grievance procedure - which you can get from One Bromley or HR officer. This Raising Concerns Policy is primarily for concerns where the interests of others or of the organisation itself are at risk. These include:
  - conduct which is an offence or a breach of law
  - disclosures related to miscarriages of justice
  - health and safety risks, including risks to the public as well as other employees
  - the unauthorised use of public funds
  - possible fraud and corruption
  - sexual, physical, verbal or financial abuse of clients

**If in doubt - raise it!**

### OUR ASSURANCES TO YOU

7. The Chief Executive, Chief Officers and Members are committed to this policy. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result. We will not tolerate the harassment or victimisation of anyone raising a genuine concern. Provided you are acting honestly and reasonably believe it to be in

the public interest, it does not matter if you are mistaken or if there is an innocent explanation for your concerns. Of course we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

8. With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.
9. Please remember that if you do not tell us who you are it will be much more difficult for us to look into the matter. We will not be able to protect your position or to give you feedback. Accordingly you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.
10. If you are unsure about raising a concern you can get independent advice from Public Concern at Work which is an independent charity on 020 7404 6609 or by email at [helpline@pcaw.org.uk](mailto:helpline@pcaw.org.uk). Their lawyers can talk you through your options and help you raise a concern about malpractice at work.

## HOW TO RAISE A CONCERN INTERNALLY

11. As a first step, you should normally raise concerns with your immediate manager or team leader. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.
12. If you are unable to raise the matter with your manager, for whatever reason, please raise the matter with:

**Mark Bowen**

Director of Corporate Services  
Bromley Civic Centre,  
Stockwell Close,  
Bromley, Kent.  
T: 020 8313 4355  
[mark.bowen@bromley.gov.uk](mailto:mark.bowen@bromley.gov.uk)

**OR**

**David Hogan**

Head of Audit  
Bromley Civic Centre,  
Stockwell Close,  
Bromley, Kent.  
T: 020 8313 4886  
[david.hogan@bromley.gov.uk](mailto:david.hogan@bromley.gov.uk)

13. If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact

**Ade Adetosoye**

Interim Chief Executive  
Bromley Civic Centre,  
Stockwell Close,  
Bromley, Kent.  
T: 020 8313 4652  
[ade.adetosoye@bromley.gov.uk](mailto:ade.adetosoye@bromley.gov.uk)

**Neil Reddin** - Chairman,  
Audit Sub- Committee  
c/o Members' Room,  
Bromley Civic Centre,  
Stockwell Close,  
Bromley, Kent.  
BR1 3UH  
T: 07850 921767  
[neil.reddin@bromley.gov.uk](mailto:neil.reddin@bromley.gov.uk)

**OR** **William Huntington-Thresher** -Vice Chairman,  
Audit Sub- Committee  
c/o Members' Room,  
Bromley Civic Centre,  
Stockwell Close  
Bromley, Kent.  
BR1 3UH  
T: 07733 116799  
[william@ocat.co.uk](mailto:william@ocat.co.uk)

14. The concern could be raised verbally or in writing. If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

#### **HOW THE COUNCIL WILL RESPOND**

15. Once you have told us of your concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you.
16. If you ask, we will write to you summarising your concern and setting out how we propose to handle it and provide a timetable for feedback. If we have misunderstood the concern or there is any information missing please let us know.
17. When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant procedure, we will let you know.
18. Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

#### **MONITORING / OVERSIGHT**

19. The Monitoring Officer (who is the Director of Corporate Services) has overall responsibility for the maintenance and operation of this policy. That officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Council.

#### **HOW THE MATTER CAN BE TAKEN FURTHER**

20. While we hope this policy gives you the reassurance you need to raise such matters internally, we recognise that there may be circumstances where you can properly report matters to outside bodies, such as regulators or the police. Public Concern at Work (see paragraph 10) or your union will be able to advise you on such an option and on the circumstances in which you may be able to contact an outside body safely.

Committee on Standards in Public Life  
Review of Local Government Ethical Standards:  
Stakeholder Consultation

Submission from the Standards Committee  
of the London Borough of Bromley

1.1 The Standards Committee of the London Borough of Bromley considered the consultation on local government ethical standards at its meeting on 22<sup>nd</sup> February 2018. The Committee is comprised of five elected members of the Council, from all political groups, plus two co-opted members. This submission is based on the Committee's comments.

1.2 The Committee wished to make one particular comment in relation to the consultation. This is a general comment applicable across local government in England and is related most closely to consultation questions (b) about significant gaps in the ethical standards regime and (f) on sanctions for councillor misconduct.

1.3 The Committee's concern is about the lack of sanctions available to Standards Committees, and the reliance on party groups to discipline their own members. There are criminal penalties in place for serious failures to register or declare pecuniary interests, and Councillors can be disqualified if they are convicted of a criminal offence and receive a sentence of eighteen months or longer. However, there is a potential loophole in that a councillor could be convicted of a relatively serious criminal offence, but still remain in office as a councillor if the sentence was below eighteen months. The Committee considered that the eighteen month limit should potentially be lowered.

1.4 In practice, the complaints made against Councillors in Bromley in recent years have been of a relatively minor nature, and there has been no need to impose any significant sanctions. However, there is a concern that, below the level of serious criminal conduct, there seems to be very little in the way of effective sanctions that a Standards Committee could apply beyond naming and shaming and certain limited administrative actions. Even sanctions such as requiring an apology or attendance at appropriate training cannot be made mandatory, and removal or suspension from committees can only be carried out with the cooperation of the relevant party group. This also means that there is a lack of any deterrent effect.

1.5 In conclusion, the Standards Committee would like to see consideration of how a broader range of sanctions can be made available that spans the current divide between the penalties for committing serious criminal offences and the limited actions that are needed for very minor matters. These could include giving Standards Committees powers to suspend councillors for temporary periods, remove them from committees or other offices, or require mandatory training.

Contact:

Graham Walton  
Democratic Services Manager,  
London Borough of Bromley  
[graham.walton@bromley.gov.uk](mailto:graham.walton@bromley.gov.uk)

**Dispensations granted by the Monitoring Officer**

<b><u>Cllr</u></b>	<b><u>Request Received</u></b>	<b><u>Date of Decision</u></b>	<b><u>Decision</u></b>	<b><u>Notes</u></b>
Simon Fawthrop	4/9/18	5/9/18	A dispensation be granted to allow Cllr Simon Fawthrop to attend and speak at Executive, Resources and Contracts PDS Committee on 5 <sup>th</sup> September 2018 when the report on Social Care Case Management System on the Executive's Agenda for the meeting on 12 <sup>th</sup> September 2018 is discussed. (As an employee of British Telecom, the Council's IT contractor who have been involved in assessing this project, Cllr Fawthrop would potentially have a pecuniary interest. However, he considers that this interest is tangential at this stage, arising only from his employment, and that there are no immediate recommendations in relation to BT, or that would benefit BT or himself.)	Dispensation re-confirmed 14/11/18 by Mark Bowen for ER&C PDS, Executive and full Council meetings in November/December
Will Harmer	4/9/18	5/9/18	A dispensation be granted to allow Cllr Will Harmer to attend and speak at Executive, Resources and Contracts PDS Committee on 5 <sup>th</sup> September 2018 when the report on Social Care Case Management System on the Executive's Agenda for the meeting on 12 <sup>th</sup> September 2018 is discussed. (Cllr Harmer is also employed by BT - See note above.)	Confirmed at ER&C PDS Committee on 5/9/18  Dispensation re-confirmed 14/11/18 by Mark Bowen for ER&C PDS, Executive and full Council meetings in November/December
Nicholas Bennett	30/4/15	20/5/15	That an unconditional dispensation be granted to Councillor Nicholas Bennett J.P. to be allowed to attend and address Plans Sub-Committee No. 1 on 21 <sup>st</sup> May 2015 on his planning application for 18 Upper Park Road, Bromley. The dispensation applies to any subsequent meetings on the same application until the end of the current Council.	

Simon Fawthrop	7/7/15	9/7/15	<p>In the absence of any objection or request to refer the matter to a meeting of the Urgency Committee I confirm that you have a dispensation</p> <ol style="list-style-type: none"> <li>1. To remain in the room and chair the BAE item if there is any discussion this evening</li> <li>2. To report the views of the Committee to the Executive</li> </ol> <p>It is on balance appropriate to extend the dispensation to cover any matters which arise from any discussion at E&amp;R tonight or from the Executive decision next week save where they directly affect the employment of Mrs Fawthrop which come back to your committee for the remainder of the municipal year.</p>	
Katy Boughey	22/7/15	29/7/15	That an unconditional dispensation be granted to Councillor Katy Boughey to be allowed to attend and address Plans Sub-Committee No. 2 on 30 <sup>th</sup> July 2015 on her planning application for 6 The Meadow, Chislehurst (15/01930). The dispensation applies to any subsequent meetings on the same application until the end of the current Council.	(Decision made by Susan Fraser, Acting Monitoring Officer)
David Livett	19/8/15	26/8/15	That an unconditional dispensation be granted to Councillor David Livett to be allowed to attend and address Plans Sub-Committee No. 4 on 27 <sup>th</sup> August 2015 on the planning application for Chislehurst House, 143 Chislehurst Road, Orpington (15/00887). The dispensation applies to any subsequent meetings on the same application until the end of the current Council.	
Katy Boughey	15/10/15	21/10/15	That an unconditional dispensation be granted to Councillor Katy Boughey to be allowed to attend and address Plans Sub-Committee No. 4 on 22 <sup>nd</sup> October 2015 on her planning application for 46 Camden Park Road, Chislehurst (15/03351/FULL1). The dispensation applies to any subsequent meetings on the same application until the end of the current Council.	(Decision made by Susan Fraser, Acting Monitoring Officer)

Mary Cooke	5/10/16	12/10/16	That an unconditional dispensation be granted to Cllr Mary Cooke to be allowed to attend and address Plans Sub-Committee No. 2 on 3 <sup>rd</sup> November 2016 on her planning application for 45 Tootswood Road (16/04088). The dispensation applies to any subsequent meetings on the same or similar applications until the end of the current Council year.	
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**Gifts and Hospitality Declarations (since February 2018)**

<b>Councillor</b>	<b>Date</b>	<b>Provider</b>	<b>Gift or hospitality</b>
<b>Graham Arthur</b>	22nd June 2018	New owners of Liberata	Guards Polo Club, Windsor - Polo Match and lunch, with taxi journeys.
	18 <sup>th</sup> August 2018	Biggin Hill Airport Ltd	Biggin Hill Airshow - 2 Complimentary tickets and hospitality.
<b>Julian Benington</b>	18th August 2018	Biggin Hill Airport Ltd	Biggin Hill Airshow with Mrs Benington. The Invitation included lunch and tea/coffee, but other drinks were in a cash bar.
<b>Nicholas Bennett</b>	May 2018	Mytime Active Board of Trustees	Bottle of Chateau Neuf Du Pape and Decanter on retirement as a trustee
	18 August 2018	Biggin Hill airport Ltd	2 Tickets and hospitality to the Biggin Hill Airshow
<b>Mike Botting</b> <i>(Mayor's Consort 2018/19)</i>	6th July 2018	Bromley Cricket Club	Bromley Cricket Club - v England XI fundraising event at Bromley Cricket Club, 98 Plaistow Lane, Bromley, BR1 3AS - Accompanied the Mayor as her consort (cost of a seat at the event approximately £25).
	16th August 2018	A resident	Received a bottle of Taylor's Port from a resident as thanks for assistance with a planning matter - donated to the Mayor's Charity Raffle
	18th August 2018	Chairman of Biggin Hill Airport Ltd	Received hospitality as the Mayor's Consort at the Biggin Hill Air Show
	7th-10th September 2018	Lord Mayor of Neuwied	Accompanied the Mayor of Bromley as her consort on an official visit to our Twin Town Neuwied in Germany. The cost of the trip was funded by ourselves, the London Borough of Bromley and the Lord Mayor of Neuwied. Hospitality received included travel, accommodation and food exceeding £25.
	11th September 2018	Province of West Kent Masons/ Giacomo's Ristorante Italiano	Accompanied the Mayor of Bromley as her consort to the Giacomo's Ristorante Italiano in Morleys Road, Sevenoaks where the Mayor was presented with a cheque towards her charities by the Province of West Kent Masons. A meal was provided which would have exceeded £25.
	23rd September 2018	Sundridge Park Golf Club	Accompanied the Mayor of Bromley as her consort to celebrate the new Club Captain's 'Drive In' and lunch to follow. The hospitality received was in excess of £25.

	29th September 2018	Ada and Albert Charity	Accompanied the Mayor of Bromley as her Consort to the inaugural Ball for the Ada and Albert Charity at the Warren Sports Club. The hospitality that I received was in excess of £25.
	5th October 2018	St. Christopher's Hospice/ Beaverwood Club	Accompanied the Mayor of Bromley as her Consort to the St. Christopher's Hospice Charity fundraiser at the Beaverwood Club, Beaverwood Road, Chislehurst. The hospitality that I received was in excess of £25.
	12th October 2018	The Warren Sports Club.	Accompanied the Mayor of Bromley as her Consort to the Healthcare Ball at the Warren Sports Club. The hospitality that I received was in excess of £25.
	18th November 2018	Asian Curry Awards - the Grosvenor House Hotel	Accompanied the Mayor of Bromley as her Consort to the Asian Curry Awards at the Grosvenor House Hotel, Park Lane. London. W1. The hospitality that I received was in excess of £25.
	30th November 2018	Cystic Fibrosis Ball/Club Langley,	Accompanied the Mayor of Bromley as her Consort to the Cystic Fibrosis Ball at Club Langley, Hawksbrook Lane, Beckenham. The hospitality that I received was in excess of £25.
<b>Katy Boughey</b>	8th June 2018	Bruce and Anna Walker	Lunch at Bullers Wood School
	7th December 2018	The Substantia Group	Lunch
	19th December 2018	Bruce Walker	Lunch at Bullers Wood School
<b>David Cartwright</b>	December 2018	Churchill Theatre	Pantomime tickets (4 at reduced price of £20 each)
<b>Peter Fortune</b>	25th July 2018	A resident	A bottle of champagne for resolving a long term environmental/utility issue.
<b>David Jefferys</b>	7th July 2018	Mytime Active	Attended London Youth Games
<b>Charles Joel</b>	18th March 2018	Langley Park Centre for the Performing Arts	Two complimentary tickets worth £10 each.
	6th January 2019	A ward resident	A financial gift to use for a meal for myself and my wife.

<b>Michael Rutherford</b>	8th July 2018	MyTime Active	VIP pass for the London Youth Games and two items of Team Bromley clothing (total value about £60.)
<b>Diane Smith</b>	26th August 2018	Abbots Way Allotments	Gift of bottle of Brandy (value unknown) for judging exhibits at the Annual Site Show
<b>Melanie Stevens</b>	18th August 2018	Biggin Hill Airport Ltd	Guest, with Mr Stevens, at the Air Show. The Invitation included lunch and tea/coffee, but other drinks were in a cash bar.
	1st December 2018	Churchill Theatre	2 Pantomime Tickets at the half price cost of £40.00, given directly to be used by our Looked After Children
<b>Stephen Wells</b>	18th August 2018	Biggin Hill Airport Ltd	Free ticket to airshow (made equivalent donation to the Chartwell Cancer Trust)
<b>Angela Wilkins</b>	27th July 2018	Ballers FC	Football shirt with personalised stripe

By virtue of paragraph(s) 2 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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