

# **GREATER MANCHESTER COMBINED AUTHORITY STANDARDS COMMITTEE**

**DATE:** Friday, 15th December, 2023

**TIME:** 10.00 am

**VENUE:** Council Chamber Ante-room, Manchester Town Hall  
Extension (Entry via Mount Street Entrance),  
Manchester, M602LA

## **AGENDA**

- 1. Apologies**
- 2. Chairs Announcements and Urgent Business**
- 3. Declarations of Interest** 1 - 4  
To receive declarations of interest in any item for discussion at the meeting. A blank form for declaring interests has been circulated with the agenda; please ensure that this is returned to the Governance & Scrutiny Officer at least 48 hours in advance of the meeting.
- 4. Terms of Reference** 5 - 10  
To note the terms of reference for the GMCA Standards Committee.
- 5. Minutes of the meeting held 10 February 2023** 11 - 14  
To consider the approval of the minutes of the meeting held 10 February 2023.

<b>BOLTON</b>	<b>MANCHESTER</b>	<b>ROCHDALE</b>	<b>STOCKPORT</b>	<b>TRAFFORD</b>
<b>BURY</b>	<b>OLDHAM</b>	<b>SALFORD</b>	<b>TAMESIDE</b>	<b>WIGAN</b>

6. **Review of GMCA Complaints Procedure** 15 - 26  
Report of Gillian Duckworth, GMCA Solicitor and Monitoring Officer
7. **Review of the Code of Corporate Governance** 27 - 48  
Report of Gillian Duckworth, GMCA Solicitor and Monitoring Officer
8. **Standards Committee Work Programme 2023/24** 49 – 50

<b>Name</b>	<b>Organisation</b>	<b>Political Party</b>
Geoff Linnell		
Councillor Gerald Cooney	Tameside Council	Labour
Councillor Bev Craig	Manchester CC	Labour
Councillor Mark Hunter	Stockport	Liberal Democrats
Councillor Nicholas Peel	Bolton Council	Labour
Councillor Arooj Shah	Oldham Council	Labour

For copies of papers and further information on this meeting please refer to the website [www.greatermanchester-ca.gov.uk](http://www.greatermanchester-ca.gov.uk). Alternatively, contact the following Governance & Scrutiny Officer: nicola.ward@greatermanchester-ca.gov.uk

This agenda was issued on 7 December 2023 on behalf of Julie Connor, Secretary to the Greater Manchester Combined Authority, Broadhurst House, 56 Oxford Street, Manchester M1 6EU

## Declaration of Councillors' Interests in Items Appearing on the Agenda

Name and Date of Committee.....>

Agenda Item Number	Type of Interest - PERSONAL AND NON PREJUDICIAL Reason for declaration of interest	NON PREJUDICIAL Reason for declaration of interest Type of Interest – PREJUDICIAL Reason for declaration of interest	Type of Interest – DISCLOSABLE PECUNIARY INTEREST Reason for declaration of interest

Please see overleaf for a quick guide to declaring interests at GMCA meetings.

## Quick Guide to Declaring Interests at GMCA Meetings

Please Note: should you have a personal interest that is prejudicial in an item on the agenda, you should leave the meeting for the duration of the discussion and the voting thereon.

This is a summary of the rules around declaring interests at meetings. It does not replace the Member's Code of Conduct, the full description can be found in the GMCA's constitution Part 7A.

Your personal interests must be registered on the GMCA's Annual Register within 28 days of your appointment onto a GMCA committee and any changes to these interests must notified within 28 days. Personal interests that should be on the register include:

1. Bodies to which you have been appointed by the GMCA
2. Your membership of bodies exercising functions of a public nature, including charities, societies, political parties or trade unions.

**You are also legally bound to disclose the following information called Disclosable Personal Interests which includes:**

1. You, and your partner's business interests (eg employment, trade, profession, contracts, or any company with which you are associated).
2. You and your partner's wider financial interests (eg trust funds, investments, and assets including land and property).
3. Any sponsorship you receive.

**Failure to disclose this information is a criminal offence**

**Step One: Establish whether you have an interest in the business of the agenda**

1. If the answer to that question is 'No' then that is the end of the matter.
2. If the answer is 'Yes' or Very Likely' then you must go on to consider if that personal interest can be construed as being a prejudicial interest.

## Step Two: Determining if your interest is prejudicial

A personal interest becomes a prejudicial interest:

1. where the wellbeing, or financial position of you, your partner, members of your family, or people with whom you have a close association (people who are more than just an acquaintance) are likely to be affected by the business of the meeting more than it would affect most people in the area.
2. the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice your judgement of the public interest.

### For a non-prejudicial interest, you must:

1. Notify the governance officer for the meeting as soon as you realise you have an interest.
2. Inform the meeting that you have a personal interest and the nature of the interest.
3. Fill in the declarations of interest form.

### To note:

1. You may remain in the room and speak and vote on the matter  
If your interest relates to a body to which the GMCA has appointed you to, you only have to inform the meeting of that interest if you speak on the matter.

### For prejudicial interests, you must:

1. Notify the governance officer for the meeting as soon as you realise you have a prejudicial interest (before or during the meeting).
2. Inform the meeting that you have a prejudicial interest and the nature of the interest.
3. Fill in the declarations of interest form.
4. Leave the meeting while that item of business is discussed.
5. Make sure the interest is recorded on your annual register of interests form if it relates to you or your partner's business or financial affairs. If it is not on the Register update it within 28 days of the interest becoming apparent.

### You must not:

Participate in any discussion of the business at the meeting, or if you become aware of your disclosable pecuniary interest during the meeting participate further in any discussion of the business,  
participate in any vote or further vote taken on the matter at the meeting.

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**Terms of Reference Template**

<p><b>Portfolio</b></p> <p><i>Insert the name of the Committee / portfolio body</i></p>	<p>GMCA Standards Committee</p>
<p><b>Function/Purpose</b></p> <p><i>Include here where functions have been given to the Committee through Government legislation, or where a joint purpose has been agreed.</i></p>	<p>The GMCA has delegated to the Standards Committee the following powers to deal with matters of conduct and ethical standards, and the GMCA's Standards Committee has the following role and functions:</p> <ul style="list-style-type: none"><li>(a) to promote and maintain high standards of conduct by GMCA Members;</li><li>(b) to assist GMCA Members to observe the GMCA's Code of Conduct for Members;</li><li>(c) to advise the GMCA on the adoption, revision or replacement of the GMCA's Code of Conduct for Members and the GMCA's Arrangements for Dealing with Complaints that GMCA Members have failed to comply with the GMCA's Code of Conduct for Members ("the GMCA's Arrangements");</li><li>(d) to monitor the operation of the GMCA's Code of Conduct for Members and the GMCA's Arrangements;</li><li>(e) to advise, train or arrange to train GMCA Members to observe the GMCA's Code of Conduct for Members;</li></ul>

(f) to determine, or to delegate to a Standards (Hearings) Sub-Committee to determine, in accordance with the GMCA's Arrangements whether a GMCA Member has failed to comply with the GMCA's Code of Conduct for Members and, if so, to determine, or to delegate to a Standards (Hearings) Sub-Committee to determine, what action (if any) to take in respect of the GMCA Member, such actions to include –

- publication of the findings of the GMCA's Standards (Hearings)
- Sub-Committee in respect of the Subject Member's conduct;
- reporting the findings of the GMCA's Standards (Hearings) Sub Committee to the GMCA for information;
- recommendation to the GMCA that the Subject Member should
- be censured;
- instructing the GMCA's Monitoring Officer to arrange training for
- the Subject Member;
- recommendation to the GMCA that the Subject Member should
- be removed from all appointments to which the Subject Member
- has been appointed or nominated by the GMCA;
- placing such restrictions on the Subject Member's access to
- staff, buildings or parts of buildings provided for the use of the
- GMCA as may be reasonable in the circumstances.

(g) to determine appeals against the GMCA Monitoring Officer's decision on the grant of dispensations.



<p><b>Delegations</b></p> <p><i>Include here where delegations have been given through legislation or directly by the GMCA or GM Mayor.</i></p>	<p>(a) to overview the GMCA's whistle blowing policy;</p> <p>(b) to consider the GMCA's Code of Corporate Governance and the Annual Governance Statement.</p>
<p><b>Accountability</b></p> <p><i>Include here how the committee or portfolio body is made up, to where it directly reports etc.</i></p>	<p>The Standards Committee is a Committee of the GMCA, its minutes are noted by them. The Standards Committee may appoint one or more sub-committees for the purpose of discharging any of the Committee's functions. Any such subcommittee shall be chaired as determined by the Committee and shall have a quorum of three.</p>
<p><b>Statutory/Decision Making/Informal</b></p> <p><i>Include here whether the committee or portfolio body is statutory i.e. legally required.</i></p>	<p>Statutory</p>
<p><b>Membership</b></p>	<p>The Standards Committee will be composed of:</p> <ul style="list-style-type: none"> <li>• Five members of the GMCA (none of whom shall be the Chair);</li> </ul> <p>and</p>

<p><i>Detail here the membership of the committee or portfolio body, the required number of (and type of) members i.e. those who are elected members. In listing officers, ensure that these are referenced by job title/organisation.</i></p>	<ul style="list-style-type: none"> <li>• One person appointed by the GMCA who is not a Member or officer of the GMCA or an elected member or officer of any of the Constituent Councils (Co-opted Independent Member).</li> </ul>
<p><b>Appointment of Chair (and Vice Chair)</b></p> <p><i>Explain how the Chair is appointed and whether there is a legal requirement to appoint a certain person to Chair, also whether there is a designated length of term.</i></p>	<p>The GMCA will appoint the Co-opted Independent Member as Chair of the Committee. In the absence of the appointed Chair, the Committee will be chaired as determined by the Committee.</p>
<p><b>Quoracy</b></p>	<p>The quorum for the Standards Committee shall be three (and in relation to the matters referred to in paragraph 4.3 (f) and (g) of whom at least one must be the Co-opted Independent Member), provided that the Co-opted Independent Member is not prevented or restricted from</p>

<p><i>Detail how many members of the Committee or portfolio body are required to be present before a meeting can take place, and whether there are any specifications as to the breakdown of these members.</i></p>	<p>participating by virtue of the GMCA's Code of Conduct.</p>
<p><b>Voting</b></p> <p><i>Set out here how a vote will be taken, if there is a majority vote, any casting vote etc.</i></p>	<p>The Co-opted Independent Member will not be entitled to vote at Meetings.</p> <p>Decisions will be taken by a simple majority.</p>
<p><b>Meeting arrangements</b></p> <p><i>Detail here the current meeting arrangements, i.e. frequency, location etc</i></p>	<p>The Standards Committee shall meet at least once per year, other meetings to be held as the Work Programme demands.</p>
<p><b>Lead contact</b></p>	<p>Gillian Duckworth, GMCA Monitoring Officer</p>

<i>Include here who is the main point of contact for the Committee / portfolio body</i>	
<b>Date TOR were approved</b> <i>Detail the date that these terms of reference were approved</i>	September 2019 by the Committee, although approved by the GMCA in June 2022.

## MINUTES OF THE MEETING OF THE GMCA STANDARDS COMMITTEE HELD ON FRIDAY 10 FEBRUARY 2023

### PRESENT:

Geoff Linnell	Independent Member
City Mayor Paul Dennett	Salford
Councillor Gerald Cooney	Tameside
Councillor Bev Craig	Manchester

### ALSO PRESENT:

Sarah Horseman	Head of Audit and Assurance, GMCA
Gwynne Williams	Deputy Monitoring Officer, GMCA
Nicola Ward	Governance & Scrutiny, GMCA

### GMSC/01/23      APOLOGIES

Apologies were received and noted from Councillor Amanda Chadderton (Oldham) and Councillor Martyn Cox (Bolton).

### GMSC/02/23      CHAIRS ANNOUNCEMENTS AND URGENT BUSINESS

#### RESOLVED/-

There were none.

### GMSC/03/23      DECLARATIONS OF INTEREST

#### RESOLVED/-

There were no declarations of interest.

**GMSC/04/23            MINUTES OF THE GMCA STANDARDS COMMITTEE  
MEETING HELD ON 17 DECEMBER 2021**

**RESOLVED/-**

That the minutes of the GMCA Standards Committee meeting held on 17 December 2021 be approved.

**GMSC/05/21            LOCAL GOVERNMENT ASSOCIATION (LGA) MODEL CODE  
OF CONDUCT FOR MEMBERS**

Gwynne Williams, Deputy Monitoring Officer to the GMCA, took members through a report which updated the Standards Committee on the publication of the Local Government Association Model Code of Conduct for Members.

The Committee had previously considered this model code at their last meeting, however had determined to defer its adoption until Government had responded to the Committee for Standards in Public Life (CSPL) on their recommendations on suggested legislative changes. Government published its response to the CSPL's recommendations in March 2022 which was to make no legislative changes in relation to strengthening sanctions.

Members were reminded that this Code applied to all members of the GMCA, the GM Mayor and any Local Authority elected members who are appointed to a GMCA or joint committee. In addition, the Deputy Mayor for Policing and Crime voluntarily undertakes to abide by the Code. Mayoral Advisors are held to account either through the officer code of conduct if they are employees of the GMCA or otherwise through the standards stipulated in their appointments.

Over the past two years, four GM Local Authorities had already adopted the Model Code, therefore the Committee were asked to consider whether they would like to recommend to the GMCA to also adopt it.

Members considered that the threshold for gifts and hospitalities of £100 (or cumulative) was felt a reasonable level and in line with other Local Authorities.

The Committee also urged that the reference to disclosable pecuniary interests be made as clear as possible within the Code.

**RESOLVED/-**

1. That the report be noted.
2. That with the modifications referred to, the GMCA be recommended to adopt the LGA Model Code of Conduct.
3. That the arrangements for dealing with complaints under the Code of Conduct be approved and published as appropriate.

**GMSC/07/23 MEMBER/OFFICER RELATIONS GUIDANCE**

Gwynne Williams, Deputy Monitoring Officer GMCA, introduced a report which provided an opportunity for the Committee to review the Member/Officer Relations Guidance contained in the GMCA's Constitution.

There had been a few amendments made to this guidance, predominately to include reference to reference to behaviour on social media.

Members requested that if appropriate, reference is made to the use of Teams / Zoom meetings within this guidance.

**RESOLVED/-**

1. That the report be noted.
2. That the minor revisions be approved.

Sarah Horseman, Head of Audit and Assurance, GMCA presented a report which provided an opportunity for the Committee to review the GMCA Whistleblowing Policy.

There had been one minor change in relation to the inclusion of the Freedom to Speak Guardian route by which to whistle-blow. Members were pleased to see this inclusion.

**RESOLVED/-**

That the updated version of the GMCA Whistleblowing Policy be approved.



## **GMCA Standards Committee**

Date: 15 December 2023  
Subject: Review of the GMCA Complaints Procedure  
Report of: Gillian Duckworth, GMCA Monitoring Officer

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### **PURPOSE OF REPORT:**

To report on the latest review of the GMCA Complaints Procedure and suggested amendments.

### **RECOMMENDATIONS:**

The GMCA Standards Committee is requested to note the review of the GMCA Complaints Procedure and request that officers make the suggested amendments as outlined.

### **CONTACT OFFICERS:**

Melinda Edwards, Deputy Monitoring Officer, GMCA

Nicola Ward, Statutory Scrutiny Officer, GMCA

BOLTON  
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SALFORD

STOCKPORT  
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WIGAN

## **1. INTRODUCTION**

- 1.1 In line with guidance<sup>1</sup> produced by the Local Government & Social Care Ombudsman on effective complaint handling, a review of the GMCA Complaints Procedure has been undertaken with GMCA colleagues from Governance & Scrutiny and Legal Services.
- 1.2 This report outlines the suggested amendments to ensure that our practices are simple, accessible, and as effective as possible. The complete reviewed complaints procedure is appended for reference.

## **2. SUGGESTED AMENDMENTS**

### **Simplified and accessible**

- 2.1 Although this is a GMCA complaint procedure, it is important that it makes reference to how complaints are dealt with by our delivery organisations, such as those in relation to transport and waste management. The previous iteration of the procedure listed numerous complaints mechanisms for each structure which was felt to be unnecessarily complex for those using the procedure, so we have amalgamated this list into key points of contact for transport, fire, waste and police & crime complaints.
- 2.2 We have removed the requirement for any request for a complaint review to be put in writing as this may be an inaccessible mechanism for complainants.
- 2.3 We have also ensured that the procedure itself is fully accessible so that there are no formatting or document layout barriers for readers.

### **Two stage complaint process**

- 2.4 In support of our accessible approach, we have suggested a two-stage complaint process that begins with a formal complaint and ends in a complaint review. This has

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<sup>1</sup> <https://www.lgo.org.uk/assets/attach/5908/Good-complaint-handling-spaced-out-short-page-F-13.5.22.pdf>

removed the need for an informal complaint (previously stage one complaint) as quite often these are dealt with by a department as ordinary business, i.e. enquiry, comment, suggestion and classification as a complaint would not change the approach to a response.

- 2.5 The suggested stage one is for formal complaints, which is applied when someone is not satisfied by the response given by a GMCA department and they wish to escalate it further. At this stage a manager within the department being complained about will provide a full response, noting that they are closest to the issues raised.
- 2.6 If the complainant wishes to escalate their complaint to stage two, a review can be requested. Previously the procedure specified that this had to be completed by the Monitoring Officer, however it is suggested that a review could be undertaken by any member of the Chief Executives Management Team to reduce any delay in sign off.

### **Response timeframes**

- 2.7 In line with our response timeframe for requests under Freedom of Information and formal complaints, it is suggested that the timeframe for responding to review requests (stage 2) should be amended from 25 to 20 working days.

### **Seeking consent for sharing of personal information**

- 2.8 If the complaint relates to another organisation (outside of the GMCA or TfGM), consent to share any personal data would still be required.

### **Complaint exclusions**

- 2.9 Having sought best practice from other Local Authority and Combined Authority Complaints Procedures we have also included reference to areas which are excluded from the procedure, including data protection or code of conduct complaints. However, we have also referenced that any such complaints would be directed to the appropriate point of entry.

## **3. NEXT STEPS**

- 3.1 All of the relevant and useful elements of the previous procedure remain in the updated version, including reference as to how we will deal with complaints and how to escalate a complaint once a complainant has been through our procedure and still remains dissatisfied.
  
- 3.2 With the Committee's feedback and comments, we will ensure that these changes are now made on the GMCA website and update the GMCA Constitution accordingly.

**Appendix 1 – Draft reviewed GMCA Complaints Procedure 2023**

# Greater Manchester Combined Authority Complaints Procedure

Updated December 2023

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# Greater Manchester Combined Authority – Complaints Procedure

The Greater Manchester Combined Authority ('GMCA') aims to provide the best possible service to the people and organisations across Greater Manchester. We are committed to providing high quality services to all our customers, but there may be times when things go wrong, and you are left unhappy or dissatisfied. This policy describes our procedure for handling complaints. We will treat your complaint seriously and deal with your complaint positively. We see any complaint as an opportunity to improve the way we do things.

## Our aims

We are committed to putting you first and providing quality customer service. This includes dealing with any complaint you may have as follows -

- We will deal with your complaint quickly and fairly.
- We will tell you what is happening with your complaint, and we will do everything we can to help you.
- We will treat the information you give us in confidence and will not share it with other organisations without your permission unless the law says we must (such as to prevent and detect fraud).
- We will explain our decision.
- We will use complaints to review and improve the way we provide services.
- If you make a complaint, it will not affect your rights to receive or use a GMCA service.

## How do I make a complaint?

Before submitting a complaint to the GMCA you should ensure that you have raised the complaint with the correct organisation. The GMCA has not replaced existing local authorities, individual councils of Greater Manchester's ten districts deliver most services for your community.

If you make a complaint to us that does not directly relate to an activity carried out by the GMCA we will advise which organisation, you should make your complaint to. If you have emailed or written to us, we will seek your consent before passing your complaint onto the right organisation if we need to.

Any personal data provided to the GMCA will be managed in line with the requirements of the General Data Protection Regulation and Data Protection Act 2018.

## Transport Complaints

If you have a complaint about any transport-related matter Transport for Greater Manchester's Customer Engagement Team will be pleased to help. They can be contacted on: [hello@beenetwork.com](mailto:hello@beenetwork.com) or via social media using @beenetwork. The team will make sure that any comments or complaints are logged and responded to, and further information can be found online at [www.tfgm.com](http://www.tfgm.com)

## Greater Manchester Fire and Rescue Service Complaints

Greater Manchester Fire and Rescue Service (GMFRS) is fully committed to providing the highest possible levels of service to the public of Greater Manchester. Your comments and complaints will help us to identify areas for improvement in our service delivery and result in a better and more responsive service.

[Complaints Information - GMFRS Website \(external link, opens in new tab\)](#)

## Waste and Resources Complaints

If you have a complaint about a waste site in Greater Manchester (excluding Wigan), please put your complaint in an email to the operating waste contractor, SUEZ UK Ltd. They will respond directly to you.

Email [ContractManagerGM.uk@suez.com](mailto:ContractManagerGM.uk@suez.com)

If you have been through the complaints procedure of the appropriate waste company and you are unhappy with the response provided you may wish to escalate your complaint to the GMCA Waste and Resource Team who will work with the waste contractor to investigate the issue.

Email [GMWaste@greatermanchester-ca.gov.uk](mailto:GMWaste@greatermanchester-ca.gov.uk)

Call 0161 778 7110

## Police and Crime Complaints

If you are not satisfied with how your complaint was handled by Greater Manchester Police, then you may be able to request an independent review.

Complaints relating to the outcome of a Police Review will not be considered under this process. Such complaints can only be dealt with by requesting a Judicial Review. Further information on this process is available through clicking on the link below:

[Form N461: Apply for a judicial review of a decision \(Gov.uk\)](#)

Information on how to make a general complaint regarding policing and crime can be found here - [Police and Crime Complaints](#)

## How the Greater Manchester Combined Authority Deals with Complaints

We want to make sure that when you tell us that you are not happy with something, your complaint is dealt with fairly and as quickly as possible. We have tried to make our complaints process as straight forward as possible, which is set out below.

### Exclusions

There are separate complaints processes for some specific services.

These are:

- Data Protection (Subject Access Requests)/Freedom of Information/ Environmental Information Regulations
- Your Mayor or Councillor
- Matters already subject to legal proceedings
- Insurance claims against the GMCA
- Employee (or, former employees) complaints relating to employment issues or disciplinary and grievance process
- Issues raised through the GMCA's 'Whistle-blowing' policy – these matters can be reported here - [Reporting Fraud and Whistleblowing](#)

You don't have to know which process your complaint falls within, this is just to let you know that we will sometimes deal with things differently depending on the type of complaint.

### The Complaint Stages



## Step One - Formal Complaint

If you are not happy with the services provided by the GMCA, the next step is for you to make a formal complaint.

You can do this by:

Email [enquiries@greatermanchester-ca.gov.uk](mailto:enquiries@greatermanchester-ca.gov.uk)

Post

c/o GMCA Enquiries

GMCA

Broadhurst House

56 Oxford Street

Manchester

M1 6EU

If you are unable to make a complaint using the above methods, please contact us by phone on 0161 778 7000 to discuss your requirements.

Your complaint will be handled by a manager in the team you're complaining about.

For all complaints we will:

- Let you know that your complaint has been received within 3 working days.
- Provide you with a full response within 20 working days or explain why it might take longer.
- Give you details of who has investigated your complaint and their decision on it.
- Advise you on how to take your complaint further if you are still unhappy with the outcome.

You should complain to us within 12 months of the issue happening. We will not normally act on any complaint made after a period of 12 months. However, we will consider any exceptional reasons you may give us for not meeting this time limit.

If you submit a Data Protection (Subject Access Requests)/ Freedom of Information/Environmental Information Regulations request at the same time as a complaint

relating to the same issue, we are likely to deal with the information request first as there are statutory timescales for these requests and the response may help resolve your complaint. If you do not wish to complain yourself, with your written permission, someone else can do so on your behalf.

## Step 2 - Complaint Review

If you have been through Step 1 of the complaints procedure and you are unhappy with the outcome, you can ask for your complaint to be reviewed. Please do this within 10 working days of receiving the outcome of your complaint.

We will write to you within three working days to let you know:

- Who is reviewing your complaint;
- approximately how long it will take us to carry out the review; and
- when they will send you a written reply.

We aim to complete a complaints review within 20 working days.

## Managing Unreasonable Complainant Behaviour

We are committed to dealing with all complaints fairly and impartially, and to providing a high-quality service to those who make them. Occasionally customers may pursue a complaint in an unreasonable way which impacts on the GMCA's resources and capacity to respond to their, or other people's complaints. We refer to such complainants as either vexatious or unreasonably persistent, and in such cases, we may take action to limit the contact the complainant has with us. Such occurrences are rare, and we will first write to the complainant to advise that their contact is no longer considered reasonable. Further information can be found here - [Policy on the management of unreasonable complainant behaviour](#).

## If you'd like to take things further – Local Government and Social Care Ombudsman

We hope we can resolve any complaints you might have. If, however, you are unhappy with the action we have taken, you may want to contact the Local Government Ombudsman.

You can contact the Local Government and Social Care Ombudsman about your complaint at any time. However, the Ombudsman usually gives the Combined Authority the opportunity to investigate first.

You can contact the Local Government and Social Care Ombudsman at:

Local Government and Social Care Ombudsman

PO Box 4771

Coventry CV4 0EH

Phone: 0300 061 0614

Text: 'call back' to 0762 480 3014

Website: [www.lgo.org.uk](http://www.lgo.org.uk)

If your complaint relates to a matter that is overseen by the Information Commissioner your right of appeal will be to the ICO rather than the LGO, but we will let you know when we write to you.

## Comments and suggestions

As well as learning from complaints, we want to know any comments or suggestions you may have that will help us improve our services. You can do this by telling a member of staff about your comment or suggestion or by putting your comment or suggestion in writing. You can contact us by sending an email to [enquiries@greatermanchester-ca.gov.uk](mailto:enquiries@greatermanchester-ca.gov.uk) or writing to us at:

GMCA

Broadhurst House

56 Oxford Street

Manchester

M1 6EU

## Frequently Asked Questions

### **I'm worried that if I complain, the service I receive will be affected**

We always aim to provide the best possible service to all our customers, and we will not change that just because we are investigating your complaint.

**Is the information I give you confidential?**

Any information you give us is covered by Data Protection guidelines. This means that we - will keep personal data safe and secure; will not share it with other organisations without your permission unless the law says we must; and may use it to prevent and detect fraud.

**I want to make a complaint, but want to stay anonymous - will you still investigate it?**

Yes. While it is helpful to us to know who you are so we can get in touch with you for extra details, we believe everyone has a right to complain. As a result, we will investigate anonymous complaints thoroughly.

## **GMCA Standards Committee**

Date: 15 December 2023  
Subject: Review of the GMCA Code of Corporate Governance  
Report of: Gillian Duckworth, GMCA Monitoring Officer

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### **PURPOSE OF REPORT:**

To present the GMCA's Code of Corporate Governance for review in accordance with the Standards Committee's Terms of Reference.

### **RECOMMENDATIONS:**

That the GMCA Standards Committee:

1. Reviews the GMCA's Code of Corporate Governance, and the proposed amendments;
2. Provides any additional feedback the Committee considers appropriate; and
3. Recommends the revised Code to the GMCA for adoption.

### **CONTACT OFFICERS:**

Gwynne Williams, Deputy Monitoring Officer, GMCA  
Nicola Ward, Statutory Scrutiny Officer, GMCA

BOLTON  
BURY

MANCHESTER  
OLDHAM

ROCHDALE  
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WIGAN

## **1. INTRODUCTION**

- 1.1 It is the role of the Standards Committee to consider the GMCA's Code of Corporate Governance, in accordance with its Terms of Reference as set out in the GMCA's Constitution.
- 1.2 This report outlines suggested amendments, and the proposed Code is appended for consideration.

## **2. SUGGESTED AMENDMENTS**

- 2.1 Section 4 of the Code is updated to reflect the evolving governance of the GMCA in relation to transport functions and the Bee Network Committee and in relation to overview and scrutiny following the introduction of a single committee.
- 2.2 Section 4.10 was added to the Code following the review of the constitution this year.
- 2.3 Other suggested amendments are of a typographical nature.

## **3. NEXT STEPS**

- 3.1 With the Standard's Committee's feedback and comments, the revised Code will be recommended for to the GMCA.

**Appendix 1 – Code of Corporate Governance**

## **SECTION E CODE OF CORPORATE GOVERNANCE**

### **1 INTRODUCTION**

- 1.1** This Code of Corporate Governance sets out the Greater Manchester Combined Authority's (GMCA's) governance standards. 'Corporate governance' describes how the GMCA (the Authority) directs and controls what it does.
- 1.2** Good governance provides the conditions for the GMCA and its partners to work effectively, economically and ethically. The Authority should carry out its functions in a way that demonstrates accountability, transparency, effectiveness, integrity, and inclusivity. Good governance will support the Authority to pursue its vision and secure its agreed objectives.
- 1.3** The GMCA's governance framework comprises the legislative requirements, principles, management systems and processes – including the Authority's Constitution, Operating Agreement and Protocols – and cultures and values through which the Authority exercises its leadership, fulfils its functions, and by which it is held accountable for its decisions and activities.
- 1.4** This Code is a public statement that sets out the way in which the GMCA and its attendant structures will fulfil these principles in practice and demonstrate its commitment to good corporate governance. The business of the Authority will be conducted in accordance with the Seven Principles of Public Life identified in The Nolan Committee Report (1995), namely: selflessness; integrity; objectivity; accountability; openness; honesty; and leadership.
- 1.5** This Code will be reviewed annually to ensure it continues to be fit for purpose and relevant. The Authority will review the effectiveness of its governance arrangements and internal control systems and publish the review outcomes in an annual governance review. These standards ensure the Authority is doing

the right things, in the right way, in a timely, inclusive, open, effective, honest and accountable manner.

- 1.6 The governance of the combined area of Greater Manchester is subject to a series of Parliamentary orders which continue to provide the legislative framework in which the GMCA and the elected mayor operate.

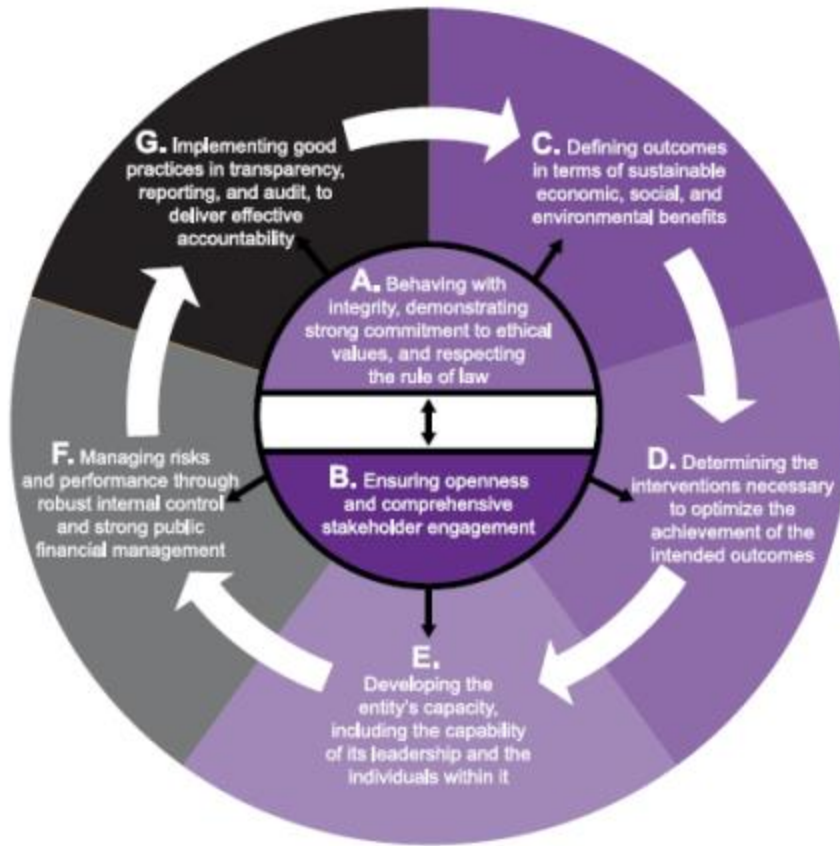
## 2 What is Good Governance

- 2.1 [International Framework: Good Governance in the Public Sector](#) (CIPFA/IFAC) describes governance as the:

*arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.....To deliver good governance in the public sector, both governing bodies and individuals working for [an authority] must try and achieve their authority's objectives while acting in the public interest at all times.*

- 2.1 The diagram below illustrates the principles of good governance, which is seen as dynamic process involving continuous evaluation and review and improvement. The following sections of this document describe how the GMCA fulfils the requirements set out in the seven principles good governance described in the diagram.





### **3 A. BEHAVING WITH INTEGRITY, DEMONSTRATING STRONG COMMITMENT TO ETHICAL VALUES, AND RESPECTING THE RULE OF LAW.**

- 3.1** The GMCA fosters a culture of behaviour based on shared values, ethical principles and good conduct that is put into practice by members and officers alike.
- 3.2** The leadership of the GMCA embodies these values and creates a climate of openness, support and respect that covers the whole organisation. It establishes, monitors and maintains the organisation's ethical standards and performance.
- 3.3** One of the challenges of working across the combined area of Greater Manchester is being clear about the relationships and roles between the districts and the GMCA. There is an operating agreement between each district and the GMCA which sets out their respective roles and also [governance protocols](#) developed as part of the first devolution agreement in November 2014.

#### **Behaving With Integrity**

- 3.4** The GMCA is committed to maintaining its values and integrity and operates a [whistle-blowing policy](#) to ensure that individuals who draw attention to factors that compromise the GMCA's integrity are adequately protected and supported in doing so. The Policy was updated in **February 2023** to ensure that it remains up-to-date and compliant with legislation. Information on how to report concerns can be located on both the external facing GMCA website and the staff intranet.

#### **Demonstrating Strong Commitment to Ethical Values**

- 3.5** The leadership of the Combined Authority has put in place robust policies and procedures which put its values into practice; these include:

- 3.6** A voluntary Standards Committee, composed of elected Members and an independent co-opted member, with responsibility for promoting and maintaining high standards of conduct; assisting Members to observe the Member Code of Conduct; overseeing the Authority's Whistleblowing Policy and monitoring the Member/Officer Protocol.
- 3.7** A Member Code of Conduct and arrangements for determining allegations that a Member has acted in breach of the Authority's Member Code of Conduct as required by the Localism Act 2011. The Code of Conduct is reviewed annually by the Standards Committee.
- 3.8** A Code of Conduct for Officers which makes it clear what standards are expected from staff across the organisation in the performance of their duties.
- 3.9** A Register of Member's Interests records members' interests in other bodies or land or assets in the Combined Authority's area and also outlines the process for registering gifts and hospitality. Each members recorded register of interests can be found on their individual member pages on the GMCA website.
- 3.10** Systems for reporting and dealing with any incidents of wrongdoing including fraud, corruption, bribery and money laundering.

### **Respecting the Rule of Law**

- 3.11** The GMCA has a Monitoring Officer (the GMCA's Solicitor) who is a member of both the GMCA's **Senior Chief Executive's** Management Team (**SCEMT**) and the Wider Leadership Team. The Monitoring Officer ensures that decisions are taken in a lawful and fair way and agreed procedures are followed and that all applicable statutes, regulations and procedure rules are complied with.
- 3.12** The GMCA uses its legal powers to promote its values and priorities to the full benefit of the citizens and communities across Greater Manchester. The GMCA has full regard to the extent of its powers and does not act beyond them, and

will observe specific requirements in legislation as well as general responsibilities of public law.

- 3.13** The GMCA's decision making process will adhere to the principles of good administrative law, respect human rights and demonstrate rationality, legality and natural justice.

### **Dealing With Breaches of Legal and Regulatory Power**

- 3.14** The GMCA appoints Statutory Officers that have the skills, resources and support necessary to perform effectively in their roles. These statutory officers include:

Head of the Paid Service (Chief Executive)

Monitoring Officer

Chief Finance Officer (GMCA Treasurer - Section 73 officer)

- 3.15** The officers working on GMCA business support these statutory officers as well as other key post holders and elected members to fulfil their responsibilities within legislative and regulatory requirements.

## **4 B. ENSURING OPENNESS AND COMPREHENSIVE STAKEHOLDER ENGAGEMENT**

### **Openness**

- 4.1** The GMCA sets out its commitment to openness in this Code, the Constitution and Annual Governance Statement.
- 4.2** Decisions taken by the GMCA subject to limited exemptions, are made in public, [minuted](#) (alongside the reasons and the evidence considered) and information relating to those decisions is made available to the public. This includes access through live webcasts of the public part only of the Authority,

Police Fire and Crime Panel and Overview and Scrutiny meetings which remain online for six months.

- 4.3** The Authority ensures that, subject to limited exemptions, its most significant decisions are recorded and that information relating to such decisions is made available to the public. The Authority publishes its intention to take key decisions through the GMCA's Register of Key Decisions which is published monthly along with GMCA's papers. Decisions taken at each meeting of the GMCA and ~~Transport for Greater Manchester~~ Bee Network Committee are published on the web page relating to that meeting and are also circulated by email to members of the GMCA Scrutiny Pool.
- 4.4** The GMCA has established one overview and scrutiny committee. The overarching purpose of ~~thesethis~~ new structure is to improve the quality of decisions made by the GMCA and elected Mayor. The committee ~~s-will~~ **does** this by:
- Reviewing the work and decisions of the GMCA and the elected Mayor, and
  - By acting as a critical friend in the development of policy and new work streams.
- 4.5** The GMCA's approach is consistent with the requirements of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. The Authority holds its key meetings in public with the agenda and public reports available on the GMCA's website. However, certain exclusions apply where there is a need to comply with confidentiality laws. - The Authority informs, consults and involves residents in significant decisions and their views are submitted to those making decisions for consideration.
- 4.6** In May 2017 the Greater Manchester Combined Authority (Transfer of Police and Crime Commissioner Functions to the Mayor) Order 2017 transferred all property, rights and liabilities of the former Police and Crime Commissioner for

Greater Manchester to the GMCA and made the functions of the police and crime commissioner in Greater Manchester, functions exercisable by the Mayor.

- 4.7** In accordance with the legislation, the Mayor has arranged for the Deputy Mayor for Policing and Crime to exercise PCC functions and he has made a Mayor's PCC Scheme of delegation as set out in the Police and Crime Commissioner Functions - Governance Documents contained in Part 9 of the GMCA Constitution.
- 4.8** The Police and Crime Panel, which is a joint committee of the Constituent Councils, was established in 2017. Following the passing in parliament of the Greater Manchester Combined Authority (Fire and Rescue Functions) (Amendment) Order 2020 – the GM Mayor was permitted to incorporate fire and rescue into the functions exercised by the GM Deputy Mayor. As of June 2020, the Panel evolved into the Police, Fire & Crime Panel. Membership of the Police, Fire and Crime Panel may not ~~longer~~ include members or substitute members of the GMCA. The role of the **GMPFCP** is to scrutinise and review decisions made or actions taken by the Mayor, the Deputy Mayor for Policing and Crime and any other person who exercises any PCC function [or fire and rescue](#) of the Mayor.

### **Engaging Comprehensively with Institutional Stakeholders**

- 4.9** The Authority develops and maintains relationships with leaders of other organisations across the private, public and voluntary sector. They ~~to~~ help [to](#) deliver the shared vision for the city region through formal governance structures and through partnership working.
- 4.10** Partnership working arrangements shall be registered by the authorising Director in the Partnership Register, held by the Deputy Director, Audit and Assurance.

### **Engaging With Individual Citizens and Service Users Effectively**

- 4.11** The GMCA consults communities, individuals, service users and other stakeholders whenever there is a legal duty to do so. The Authority informs, consults and involves residents on strategic matters and issues of interest to them. This dialogue is sustained and encouraging through a number of channels, including the live streaming of GMCA meetings and through an active social media presence on Facebook, and Twitter.
- 4.12** The Authority is committed to considering and acting upon feedback from residents and stakeholders. A transparent complaints handling procedure is in place which enables the Authority to learn effectively from the complaints it has received.

## **4 C. DEFINING OUTCOMES IN TERMS OF SUSTAINABLE ECONOMIC, SOCIAL, AND ENVIRONMENTAL BENEFITS**

### **Defining Outcomes**

- 5.1** The GMCA's strategic plan: the Greater Manchester Strategy [ [About Greater Manchester](#) ] is jointly owned by the GMCA and the GM Local Enterprise Partnership.
- 5.2** The Greater Manchester Strategy sets out Greater Manchester's ambitions for the conurbation and both bodies are jointly responsible for ensuring that the ambitions contained within these plans are delivered.
- 5.3** The Strategy 2021-2031 sets out a vision to make Greater Manchester a place where everyone can live a good life, growing up, getting on and growing old in a greener, fairer and more prosperous city region.

At the heart of the Strategy stood three shared outcomes:

- People's Wellbeing: better homes, jobs, transport, and health, living in vibrant communities
- Thriving Organisations: which succeed and look after their people, places and planet
- Leading the UK and the World: in sectors including low carbon and digital

**5.4** To enable the GMCA and GM LEP to understand performance across all strategic priorities, headline progress measures, targeted indicators and qualitative assessments will form the basis of the comprehensive performance framework and progress monitoring of the delivery of the Greater Manchester Strategy.

### **Sustainable Economic, Social and Environmental Benefits**

**5.6** The Greater Manchester Strategy's vision for the conurbation is predicated on developing a modern and productive economy, where residents are able to contribute to and benefit from growth, and where social and environmental objectives are delivered alongside GM's economic ambitions. All of its priorities are focused on delivering this vision and ensuring that everyone in GM realises their potential and all parts of Greater Manchester become thriving places.

**5.7** An Equalities Impact Assessment has been undertaken for the new Greater Manchester Strategy and its Implementation Plan, with no significant adverse impacts identified against any groups with protected characteristics.

**5.8** The leader portfolio for Equalities, Inclusion and Cohesion continues to ensure that all of the conurbation can play the fullest part and benefit from the growth of Greater Manchester.

**5.9** The portfolio holder's work is informed in part, by the Equality Act (2010) and help work to ensure that:



- GM's key strategic initiatives proactively embed the principles of promoting equalities, inclusion and cohesion within their design (and in so doing fulfil the requirements of the general equality duty);
- As an employer the GMCA integrates the consideration of equalities, inclusion and cohesion into its day-to-day business and adopts best practice to fulfil the aims of the general equality duty.

**5.10** Finally, the GMCA has been proactive in using Social Value as an enabler to deliver additional benefits for suppliers and partners across all procurement and commissioning activity. GM understands that social value can be used to reinforce the core objectives of the GM strategy and to increase the spending power – in the widest sense of the word - of every pound spent in GM. The GMCA's funding is subject to the provisions of the Public Services (Social Value) Act 2012 and so has adopted a **Social Value Framework** whose objectives are:

- To provide the best employment that you can
- To keep the air clean in Greater Manchester
- To create the employment and skills opportunities that we need to build back better
- To be part of a strong local community
- To make your organisation greener
- To develop a local, GM based and resilient supply chain

## **6 Determining the Interventions Necessary to Optimise the Achievement of the Intended Outcomes**

### **Determining Interventions**

**6.1** The GMCA provides decision makers with objective and rigorous analysis of options, covering intended outcomes, financial impact and associated risks supporting efficient service delivery.

**6.2** Greater Manchester has invested heavily in developing the evidence base which underpins its policy interventions. This has been a distinctive feature of GM's approach to developing strategic interventions. High quality evidence (including a forecasting model) together with Treasury Green Book compliant techniques for undertaking cost benefit analysis on policy interventions have been developed over the last decade. Key aspects of GM's strategic approach to evidence include the MIER (2008) – the Manchester Independent Economic Review: a significant assessment of the opportunities and challenges faced by Greater Manchester; the Greater Manchester Forecasting Model – an externally commissioned model which provides a twenty year forward look; and the Greater Manchester 'Deep Dive' work – an assessment of sectoral growth opportunities and the driver and barriers to enhanced productivity and labour market participation performance.

### **Planning Interventions**

**6.4** The GMCA plans its activity through its budget and business planning cycle and does this in consultation with internal and external stakeholders to ensure that work delivered across different organisations and partners complement each other and avoid duplication.

**6.5** This is facilitated by GM's [comprehensive governance structures](#) which support the delivery of GM's priorities across the conurbation and co-ordinate their activity. The effectiveness of interventions are monitored through the provision of regular performance reports to thematic meetings such as the Low Carbon Hub and as well as the GMCA itself.

### **Optimising Achievement of Intended Outcomes**

**6.6** GMCA is required to secure value for money as set out in the Code of Audit Practice 2010. The GMCA has to put in place proper arrangements to:

- secure economy, efficiency and effectiveness in its use of resources
- ensure proper stewardship and governance
- review regularly the adequacy and effectiveness of these arrangements.

- consider the GMCA's arrangements to secure economy, efficiency and effectiveness.

**6.7** The GMCA's approach to investing in interventions which will deliver its intended outcomes is guided by its investment strategy, which focuses on maximising the uplift in jobs and GVA. GM's model was originally developed for transport investment but has since been expanded to include regeneration and economic development investment funds to support businesses and has been complemented by more recent work using cost benefit analysis in the development of public service reform interventions.

**6.8** The Authority procures goods and services in compliance with UK and Authority regulations and ensure that value for money is obtained through a balanced consideration of social, economic and environmental impacts that can be derived from procurement spend.

## **7 E. DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT**

### **Developing the Organisation's Capacity**

**7.1** The GMCA monitors its governance and staffing to support the delivery of planned work programme. The Authority ensures that resources are directed to those activities that will make the greatest contribution to the conurbation's vision through its budget and business planning process.

**7.2** Where possible the Authority seeks information about functions, expenditure and performance from comparator organisations and uses these findings to inform its own work. Where intelligence suggests different ways of doing things will lead to improved value for money these options are explored.

7.3 The GMCA continues to develop all aspects of its approach to workforce planning and development.

### **Developing The Capability of the Organisation's Leadership and Other Individuals**

7.4 The roles and responsibilities of members and senior officers are clearly defined within the GMCA Constitution, Operating Agreement and Protocols. The Constitution also sets out the GMCA's scheme of delegation (see part 3 section [DG](#)) and a protocol governing member/officer relations so that elected members and senior officers have a shared understanding of their respective roles.

7.5 The GMCA is committed to developing the capability of people with governance responsibilities and ensuring that officers working on GMCA business understand the importance of governance within their role. An induction and training programme for members and officers is tailored to individual needs and provides an opportunity to learn about new developments as well as their governance responsibilities.

7.6 The Authority has an open approach to external and peer review and inspection and actively considers constructive feedback.

## **8 F. MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT**

### **Managing Risk**

8.1 The GMCA maintains a risk register, which supports the identification and management of key risks. The risk register is reviewed at every meeting of the [Audit Committee](#) and informs decision making, protects the Authority's reputation and other assets and is compliant with statutory and regulatory

obligations. The GMCA's Corporate Risk Register names risk **owners** for each of its key strategic risks.

## **Managing Performance**

**8.2** Regular performance reports are provided to the GMCA's thematic meetings who manage the Authority's work programme as well as the GMCA itself.

**8.3** Relevant, objective and reliable performance information is used to inform decision making, alongside the financial implications and risk information associated with each decision.

## **Effective Overview and Scrutiny**

**8.4** The Authority believes that effective overview and scrutiny of decisions leads to improved decision making and improved public services. The Authority has established and maintains an effective Scrutiny function as required by the Combined Authorities (Overview and Scrutiny Committees, Access to Information and Audit Committees) Order 2017 which is able to constructively challenge decision-makers, including those who work in partnership with the Authority, and policy makers.

## **Robust Internal Control**

**8.5** Internal control systems support the Authority to achieve its objectives by managing its risks while complying with regulations and organisational policies. This safeguards the Authority's resources against loss, fraud, misuse and damage and safeguards the confidentiality and integrity of its ICT and information systems. The Authority maintains clear policies and arrangements in respect of counter fraud and anti-corruption.

**8.6** The GMCA's [Audit Committee](#) provides a further source of assurance of the GMCA's approach to risk management and the control environment.

## **Managing Data**

- 8.7** The Authority is committed to safeguarding the personal data it holds and sharing this data only in circumstances permitted by law. Its approach to data protection is set out in its publication scheme. The Authority is committed to the safe-sharing of data -where appropriate- with other agencies where this supports the delivery of the Greater Manchester Strategy's priorities and vision.
- 8.8** The GMCA complies with the [Local Government Transparency Code 2015](#) by publishing accurate data within appropriate time frames in the areas mandated by the Code on the [GMCA website](#). The Authority regularly reviews the quality and accuracy of the data it produces, and uses in decision making and performance monitoring.

## **Strong Public Financial Management**

- 8.9** The Authority's approach to financial management ensures that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively. Its approach supports both long term achievement of objectives and short term financial and operational performance.
- 8.10** The Section 73 Officer, the GMCA's Treasurer, ensures that appropriate advice is given on all financial matters, proper financial records and accounts are kept, and oversees an effective system of internal financial control. The Treasurer ensures well developed financial management is integrated at all levels of planning and control including management of financial risks and controls.
- 8.11** The GMCA maintains a prudential financial framework; keeps its commitments in balance with available resources; and monitors income and expenditure levels to ensure that this balance is maintained and takes corrective action if necessary.

## **9. G. IMPLEMENTING GOOD PRACTICES IN TRANSPARENCY, REPORTING, AND AUDIT TO DELIVER EFFECTIVE ACCOUNTABILITY**

### **Implementing Good Practice in Transparency**

**9.1** The Authority is committed to publishing information including reports in a manner which is accessible to residents and other stakeholders. The publication of information will strike a balance between satisfying the demands of transparency and becoming too onerous for users to understand.

### **Implementing Good Practices in Reporting**

**9.2** The Authority seeks to demonstrate to its stakeholders that it has delivered its priorities. It publishes an Annual Report setting out how it has performed, charting the city region's progress towards delivering its vision. There is also an annual review of the effectiveness of its governance framework including its system of internal control and an Annual Governance Statement which is published alongside its accounts.

### **Assurance and Effective Accountability**

**9.3** The GMCA welcomes peer challenge, internal and external review and audit, and inspections from regulatory bodies. Officers and relevant member bodies consider any recommendations made and put in place arrangements for the implementation of actions agreed to be taken as a result. There is clear oversight from the GMCA and wider leadership team on the conclusions and resultant actions.

### **Monitoring and Review**

**9.4** This Code is reviewed on an annual basis to ensure it is kept up to date. Where the review identifies that changes to the Code are necessary, the revised Code will be submitted to Standards and Audit Committee for comments before being incorporated within the GMCA's Constitution.

**9.5** The GMCA has two committees that are jointly responsible for monitoring and reviewing corporate governance arrangements. These committees are:

- Audit Committee – responsible for approving the GMCA's annual accounts and responding to the auditor's annual management letter. It also oversees the effectiveness of the GMCA's governance and risk management arrangements, the internal control environment and associated anti-fraud and anti-corruption arrangements
- Standards Committee – responsible for promoting and maintaining high standards of conduct amongst Members, for advising the GMCA on the adoption and revision of the Code of Conduct for Members, and for monitoring the operation of the Code.

**9.6** Full terms of reference for each of these Committees are included in the GMCA's Constitution. The GMCA's members are informed of the work of these Committees through minutes submitted to the GMCA.

**9.7** The GMCA will ensure that corporate governance arrangements are kept under continual review by updating, as appropriate, these Committees on:

- The work of Internal and External Audit
- The opinion of other review agencies and inspectorates
- Opinions from the GMCA's Statutory Officers
- General matters relating to the implementation of the Code



- The production of the Annual Governance Statement and actions planned to address arising governance issues.

## **The Annual Governance Statement**

**9.8** Each year the GMCA publishes an Annual Governance Statement to accompany the Annual Accounts. The Statement provides an overall assessment of the GMCA's corporate governance arrangements and how it adheres to the governance standards set out in this Code. Evidence relating to the principles of this Code is reviewed and analysed to assess the robustness of the GMCA's governance arrangements.

**9.9** The Statement includes an appraisal of the key controls in place to manage the GMCA's principal governance risks and the effectiveness of systems and processes governing decision making and financial control. The Statement also provides details of where improvements need to be made. Actions to address significant governance issues are identified and recorded in an action plan. The Annual Governance Statement is audited by the GMCA's external auditors as part of the audit of the annual accounts.

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## GMCA Standards Committee

Work Programme 2023-24

\*\*This is a working document, and subject to change.

Meeting date	Item	Last reviewed by Standards	Notes
Late 2023	Code of Corporate Governance	March 2017	
Early 2024			

Policies which are within the remit of the GMCA Standards Committee

Policy	Review of any significant changes	Detailed review	Notes
The Code of Corporate Governance	As and when required following change in legislation	Every 3 years (last reviewed March 2017)	Reviewed by Audit Committee in July 2022
Members' Code of Conduct	As and when required following change in legislation	Every year (last reviewed February 2023)	
Arrangements for dealing with a complaint in relation to the Code of Conduct	As and when required following change in legislation	Every 3 years in line with a review of the constitution (November 2020)	
Gifts and Hospitality	As and when required following change in legislation	Every 2 years	
The Member/Officer Relations Protocol	As and when required following change in legislation	Every 2 years in line with a review of the constitution (Feb 2023)	

Complaints and Whistleblowing Policy	As and when required following change in legislation	Every year (Feb 2023)	
Register of Members Interests	As and when required following change in legislation	Every 3 years (December 2021 but updated in 2023 in line with changes to the Code of Conduct)	