

MANAGEMENT ACTION PLAN

Directorate:	Chief Executives
Audit report:	IR/121 – Elected members register of interests & related-party disclosures
Dated:	January 2012

PRIORITY RATINGS

Priority 1 (high) - major control weakness requiring immediate implementation of recommendation

Priority 2 (medium) - existing procedures have a negative impact on internal control or the efficient use of resources

Priority 3 (low) - recommendation represents good practice but its implementation is not fundamental to internal control

Para Ref	Recommendation	Priority Rating	Management Action Proposed	Timescale for Action	Officer Responsible	Audit Agree ?
4.12	Members should be reminded of the Guidance requiring them not to use acronyms and abbreviations, and Democratic Services should appropriately challenge any returns made using such.	2	Guidance to Members completing new style register of interests will address this point and entries checked and any lack of clarity drawn to members' attention	31 July 2012	Lead Officer Democratic Services	Yes
4.13	It is recommended that the Register design be revised to allow for distinct areas for answers to multiple questions within one same Section of the return.	2	The Register will need to be redesigned to address the requirements of the Localism Act. It is likely that Members will complete on line entries on	1 Jul 2012	Lead Officer Democratic Services	Yes

I agree the action above and overleaf.

Head of Service: Ann Charlton

Date: 24 January 2012

The action agreed is satisfactory / is not satisfactory.

Supervising Auditor: David John

Date: 24 January 2012

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			the Register			
4.14	Where member responses are insufficiently detailed when reviewed against the guidance, as identified for Section 3 responses, then Democratic Services should ask for more detailed answers for transparency.	2	Democratic Services will be able to draw lack of detail to members' attention but do not have authority to police members' declarations-	31 July 2012	Lead Officer Democratic Services	Yes
4.21	The Head of Legal and Democratic Services should review the results of the comparison of directorships declared through the Register to information online to determine the appropriate course of action in relation to each member affected.	2	No action proposed. Members do not have a duty to register all directorships in the register of Interests, although they must register any employment or business carried out by them	Not applicable	Not applicable	Yes
4.28	Members should be reminded of the need to ensure all of their interests are kept up to date in the Register of Interests as and when they change.	2	No action proposed. There will be no requirement for members to do so after 1 Jul 2012	Not applicable	Not applicable	Yes
4.29	Given the accessibility to data is straightforward, and in some case published online, it is proposed that Democratic Services officers might	2	No action proposed. It is a matter of personal responsibility for members to register their interests and officers do not have	Not applicable	Not applicable	Yes

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	periodically check the information for the twin-hatted members to corresponding borough and district council registers for consistency, and challenge any discrepancies.		authority to police this Post 1 July there will be no requirement to keep registers updated, so discrepancies would not necessarily be a breach of the Code			
4.30	It is also proposed that consideration be given to maintaining one single electronic Register of interests on a shared drive accessible to Democratic Services and the officer responsible for related party disclosures. This could include all details of personal and related party interests, and allow for one single record to be kept up to date.	2	To discuss with Leader and members agreeing new Code of Conduct and arrangements for registering interests post 1 July 2011 As of 1 July 2012 members' interests will have to be published on line. Again, there will be no requirement to update annually so members would have to agree to accept more onerous arrangements than required by law.	March 2012	Head of Legal and Democratic Services	Yes
4.35	The existing template should be amended to ensure that members formally sign their declaration to authorise content.	2	As requirement will be to register online, to look at building electronic signatures into process	1 July 2012	Lead Officer Democratic Services	Yes

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4.36	If entries to a member's declaration are made by Democratic Services officers then they must ensure that in every case an email from the member exists to approve the change, and that they and the member subsequently initials the amendment to authorise it.	2	See above	1 July 2012	Lead Officer Democratic Services	Yes
4.37	Sections of the Register should not be left blank, but be completed with an affirmation that the member has nothing to declare for that particular area.	2	Officers will take this into account in designing on line form	1 July 2012	Lead Officer Democratic Services	Yes
4.38	The use of "not applicable", "none" and such phrases should not be used to indicate no change from prior declarations. The interest(s) should be detailed in full in each return completed.	2	To take into account in designing on line declarations	1 July 2012	Lead Officer Democratic Services	Yes
4.45	The Member/Officer Protocol should be revised to offer practical guidance to officers should concerns arise in respect of whether a member interest has been appropriately declared at a council meeting.	2	From 1 July 2012 Members will not be required to disclose interests at meetings if they are registered in the Members Register. However, there will be a	1 July 2012	Head of Legal and Democratic Services	Yes

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			requirement not to participate or vote if the interest is pecuniary. Officers will deal with this through changes to Standing Orders			
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