



Governance and Audit Committee

Item
7(ii)

16 December 2025

Report of	Head of Governance and Monitoring Officer	Author	Andrew Weavers ☎ 282213
Title	Review of the Council's Ethical Governance Policies		
Wards affected	Not applicable		

1. Executive Summary

- 1.1 This report requests the Committee to review the Council's updated Ethical Governance policies. These are the key policies which set out the standards of conduct and integrity that the Council expects of councillors, staff, partners, suppliers and customers when conducting Council business. They contain procedures for dealing with breaches of the policies and processes to be followed.
- 1.2 The report also requests the Committee to recommend to Full Council to include the updated policies in the Policy Framework which comprises all the Authority's key policies.

2. Recommended Decisions

2.1 To review the following revised policies:

- Anti-Fraud and Corruption Policy
- Whistleblowing Policy
- Anti-Money Laundering Policy
- Covert Surveillance Policy
- Acceptable Use Policy (including password policy) Digital / ICT
- Income and Debt Policy

and to recommend to Full Council that they be approved for inclusion in the Council's Policy Framework.

3. Background

- 3.1 The Council is committed to maintaining the highest standards of governance including the elimination of fraud and corruption and to ensuring that all activities are conducted ethically, honestly, openly and accountably in order to protect public safety and public money.
- 3.2 A varied range of policies and procedures form the Corporate Governance framework and a selection of these relate to Ethical Governance - those specifically regarding conduct and integrity.
- 3.3 The Ethical Governance policies set out the standards of conduct and integrity that it expects from staff, elected members, suppliers, partners, volunteers and the public. Breaches of the policies will be pursued, and procedures have been introduced to enable any person to raise genuine concerns they may have about the conduct of anybody acting for or on behalf of the Council.
- 3.4 At its meeting on 26 February 2025 Full Council adopted a Statement of Intent in relation to both Ethical and Corporate Governance which gave a high organisational commitment

to zero tolerance of fraud, corruption and bribery. An updated Statement of Intent is attached at Appendix 1.

4. Review of Ethical Governance Policies

- 4.1 The Anti-Fraud and Corruption, Whistleblowing, Anti-Money Laundering, Covert Surveillance, Information Security, Data Protection, Acceptable Use, Data Retention, Processing of Special Category & Criminal Convictions Personal Data, ICT Password and Income and Debt policies were last reviewed by this Committee at its meeting on 13 December 2023. The Ethical Governance policies were subsequently adopted as part of the Council’s Policy Framework by Full Council at its meeting on 21 February 2024.
- 4.2 The following policies will be revised in February / March 2026 as part of the Data Protection Audit remediation and Delivery Plan.
- Information Security Policy
 - Data Protection Policy
 - Retention Policy
 - Processing of Special Category & Criminal Convictions Personal Data Policy

4.3 The following table indicates the number of times a policy was invoked in the past year and where appropriate whether it was effective.

Policy	No. of times invoked during 2021/22	No. of times invoked during 2022/23	No. of times invoked during 2023/24	No. of times invoked during 2024/25	Whether procedures effective
Anti-Fraud and Corruption	None	None	None	None	N/A
Whistleblowing	None	2	2	1	Yes
Anti-Money Laundering	None	None	None	None	N/A
Covert Surveillance	None	None	None	None	N/A

- 4.4 The Anti-Fraud and Corruption, Anti-Money Laundering and Covert Surveillance policies have all been reviewed to ensure that they remain fit for purpose and no changes are proposed to these policies which are appended to this report. The Whistleblowing report has been updated to make reference to the Council’s Grievance Procedure and its Anti-Harassment, Bullying and Victimisation Policy and employment legislation in line with good practice. This updated version has also been agreed with Unison.
- 4.5 The Monitoring Officer writes an annually to both Members and Officers reminding them of their obligations regarding the Anti-Fraud and Corruption and Whistleblowing policies.
- 4.6 The Council’s Head of Digital has reviewed the Acceptable Use and Password policy to ensure that they remain fit for purpose. The Head of Digital has identified that the current Acceptable Use and Password policies require urgent revision and implementation to protect the Council from increased Cyber Security risks and the National Security Threat level which is currently “Substantial – an attack is likely”.
- 4.7 Colchester City Council does not currently hold a Public Sector Network (PSN) Certificate of compliance, which is a requirement of the Cabinet Office. An independent health check by a National Cyber Security Centre approved company, (a prerequisite for a compliance certificate) was conducted in August 2025 which identified several high-risk vulnerabilities.
- 4.8 The Councils internal auditors conducted three audits, namely; Data Protection, Network Resilience (Cyber) and Mobile Device Management (MDM) in September 2025 and

concluded their recommendations in November 2025. All three audits returned Limited Assurance.

- 4.9 The independent health check and the three audits all have comprehensive remediation and delivery plans associated with them. Progress on these is reported via the Cyber, Security and Information Governance Board (CSIG), who will report to this committee.
- 4.10 The three audits each made priority one findings in relation to the significant risk associated to the practice of Members ability to download data to personal devices. This functionality was removed on 12th September 2025 and was temporarily reinstated on the 22 September 2025 to allow Members to adjust to using a corporate device.
- 4.11 Mandatory Cyber training was referenced in the audits and was accordingly introduced in November 2025. The training has a 100% compliance requirement for staff across Colchester City Council which has been achieved. Failure to have complied would have resulted in withdrawal of access to systems. Members as at the date of this report currently stand at 52% completion. All Members are urged to complete the training without further delay.
- 4.12 The Public Sector Networks IT health check combined with three audits findings are the principal drivers for the changes to the Acceptable Use Policy.
- 4.13 The Head of Operational Finance has reviewed the Income and Debt Policy and confirms that no changes are proposed to processes, which are still relevant and meet legislative requirements, whilst supporting strong collection rates. There is a proposed change to the fees for liability order and summons, as well as proposed changes to write off limits.
- 4.14 Court fees include costs for the issuing of a summons and obtaining a liability order for debt recovery. The fees are based on cost recovery and have not been increased for a number of years. Due to increase in costs of processing, it is proposed that the total fee for summons and liability order is £98.
- 4.15 The Council will endeavour to recover all debts owed, as set out within this policy. However, on occasions debts become uneconomical to pursue, or there is no realistic chance of recovery, for example in cases of liquidation. The current write off limits create an administrative burden to the Council and the proposed increases in authorisation limits will help to create a more efficient process, whilst not affecting efforts to recover debt.
- 4.16 The Council continues to achieve high collection rates for Council Tax and Business Rates. The teams are working to support customers through the cost-of-living crisis and are adapting processes where necessary to do this.
- 4.17 The Council will continue to improve processes, making payment options simple for residents and businesses and encouraging customers to contact as soon as possible if they are suffering financial difficulties.

5. Strategic Plan References

- 5.1 The Council's governance arrangements form part of the Council's commitment to delivering modern services for a modern city which underpins the Council's Strategic Plan vision.

6. Publicity Considerations

- 6.1 The Council's ethical governance policies will be published on the Council's website.

- 6.2 Financial Regulations form part of the Council's Constitution published on the Council's website
- 7. **Financial, Equality, Diversity and Human Rights, Consultation, Health, Wellbeing and Community Safety, Health and Safety, Risk Management and Environmental and Sustainability and Devolution and Local Government Reorganisation Implications**
- 7.1 None.

Ethical Governance Statement 2025/26

Colchester City Council will not tolerate breaches of its ethical governance policies.

The Council is committed to maintaining the highest standards of governance including the elimination of fraud and corruption and to ensuring that all activities are conducted ethically, honestly, openly and accountably so as to protect public safety and public money.

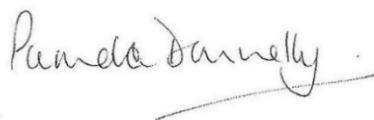
The Council expects the highest standards of conduct and integrity from all that have dealings with it including staff, elected members, suppliers, partners, volunteers and the public. Therefore, policies have been put in place to outline the standards required and procedures have been introduced to enable any person to raise genuine concerns they may have about the conduct of anybody acting for or on behalf of the Council.

The Ethical Governance policies form part of the Council's overall Corporate Governance Framework and details of all the policies have been published on the Council's website at www.colchester.gov.uk.

We will take all reasonable steps to ensure that concerns are investigated, and appropriate action taken where necessary. There will be no distinction made in investigation between cases that generate financial benefits and those that do not.



David King
Leader of the Council



Pamela Donnelly
Chief Executive

