#### **GOVERNANCE COMMITTEE**



#### TUESDAY, 22 JANUARY 2019

#### 11.30 AM (OR AT THE CONCLUSION OF THE CABINET, WHICHEVER IS THE LATER) COMMITTEE ROOM - COUNTY HALL, LEWES

#### MEMBERSHIP - Councillor Keith Glazier (Chair) Councillors Godfrey Daniel, David Elkin, Rupert Simmons and David Tutt

#### <u>A G E N D A</u>

- 1 Minutes of the meeting held on 13 November 2018 (Pages 3 4)
- 2 Apologies for absence
- 3 Disclosures of interests

Disclosures by all members present of personal interests in matters on the agenda, the nature of any interest and whether the member regards the interest as prejudicial under the terms of the Code of Conduct.

4 Urgent items

Notification of items which the Chair considers to be urgent and proposes to take at the appropriate part of the agenda. Any members who wish to raise urgent items are asked, wherever possible, to notify the Chair before the start of the meeting. In so doing, they must state the special circumstances which they consider justify the matter being considered urgent.

- 5 Anti Money Laundering Policy (Pages 5 16) Report by Chief Operating Officer
- 6 Appointment to outside bodies (Pages 17 18) Report by Assistant Chief Executive
- 7 Local Managers' Pay 2019/20 *(Pages 19 24)* Report by Chief Operating Officer
- 8 Any other items previously notified under agenda item 4

PHILIP BAKER Assistant Chief Executive County Hall, St Anne's Crescent LEWES BN7 1UE

Contact Andy Cottell, 01273 481955,

Email: andy.cottell@eastsussex.gov.uk

14 January 2019

#### GOVERNANCE COMMITTEE

MINUTES of a meeting of the Governance Committee held at Committee Room - County Hall, Lewes on 13 November 2018.

PRESENT Councillors Keith Glazier (Chair), Godfrey Daniel, David Elkin, Rupert Simmons and David Tutt

ALSO PRESENT Councillor John Ungar (who spoke on minute 23)

#### 21 MINUTES OF THE MEETING HELD ON 18 SEPTEMBER 2018

21.1 RESOLVED – that the minutes of the previous meeting of the Committee held on 18 September 2018 be confirmed and signed as a correct record.

#### 22 <u>REPORTS</u>

22.1 A copy of the report referred to below are included in the minute book.

#### 23 NOTICE OF MOTION: WEBCASTING OF SCRUTINY COMMITTEE MEETINGS

23.1 The Committee considered a report by the Assistant Chief Executive regarding a Notice of Motion in relation to the webcasting of scrutiny committee meetings.

23.2 The Committee RESOLVED (by 4 votes to 1) to – recommend the County Council to reject the Notice of Motion

# Agenda Item 5

Report to:	Governance
Date of meeting:	22 January 2019
By:	Chief Operating Officer
Title:	Anti-Money Laundering Policy
Purpose:	To provide details of, and seek approval to, the main changes to the above policy.

#### RECOMMENDATIONS

# The Governance Committee is recommended to approve the Anti-Money Laundering Policy as set out at Appendix 1 to this report

#### 1 Background

1.1 As part of a programme of work to strengthen the County Council's approach to antifraud and corruption, a review has recently been conducted of our Anti-Money Laundering Policy to ensure that it remains fit for purpose and consistent with best practice.

#### 2 Supporting information

2.1 This work has now been completed, with the updated policy recently endorsed by the Audit Committee, prior to being presented to this Committee for final approval. The updated policy document is therefore attached to this report and set out below is a high level summary of the main changes.

#### 2.2 The main changes are:

- Updated reference to relevant legislation
- Changes to money laundering officer and deputy
- Adoption of risk based approach, inclunding a money laundering risk assessment
- The rationale for these changes is the need to ensure that the policy is fit for purpose and complies with current legislation and best practice.

#### 3. Conclusion and reasons for recommendations

3.1 The Council continues to demonstrate a commitment to anti-fraud and corruption and the changes made to this document seek to strengthen its arrangements further, not through any fundamental shift in approach, but rather through building on and enhancing what we already have in place.

#### KEVIN FOSTER Chief Operating Officer

Contact Officer: Simon White, Audit Manager Counter Fraud Tel. No. 020 8541 9191 Email: simon.white@surreycc.gov.uk

## **Anti-Money Laundering Policy**



Date: October 2018

### **Document summary**

This policy sets out the procedures that must be followed to enable the Council to comply with its legal obligations to prevent criminal activity through Money Laundering.

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## About this document:

Enquiries: Internal Audit and Counter Fraud Author: Internal Audit and Counter Fraud Telephone: 020 8541 9191 Email: <u>simon.white@surreycc.gov.uk</u> Download this document From: http://intranet.escc.gov.uk/helping/financepu rchasing/finance/Documents/antimoneylaun dering.doc	Version number: 05 Related information Anti-Fraud and Corruption Strategy Code of Conduct and Conflict of Interest Policy Disciplinary Policy and Procedures Whistleblowing policy – Raising concerns
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### Accessibility help

Zoom in or out by holding down the Control key and turning the mouse wheel.

CTRL and click on the table of contents to navigate.

Press CTRL and Home key to return to the top of the document

Press Alt-left arrow to return to your previous location.

References shown in blue text are available on the Intranet/Czone

References shown in underlined blue text are links to other areas of this document

### Policy statement

East Sussex County Council will do all it can to:

- Prevent any attempts to use the Council and its staff to launder money;
- Identify potential areas where money laundering may occur; and
- Comply with all legal and statutory requirements, especially with regard to the reporting of actual or suspected cases of money laundering.

### 1. Introduction

- 1.1 The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, the Proceeds of Crime Act 2002 and the Terrorism Act 2000 (and all relevant amending legislation) place obligations on the council, including its members and employees, with respect to suspected money laundering.
- 1.2 While most money laundering activity in the UK occurs outside of the public sector, vigilance by Council members and officers can help identify those who are, or may be, perpetrating crimes relating to the financing of terrorism and money laundering.
- 1.3 This policy forms part of the Council's counter fraud framework and sets out:
  - Definitions and legal background in respect of money laundering;
  - The Council's approach to money laundering including the responsibility of members and officers to report suspicions promptly; and
  - Guidance and procedures for members and officers.

### 2. Scope of the policy

- 2.1 This policy applies to all members and officers of the Council and aims to maintain the high standards of conduct that the public is entitled to expect from the Council.
- 2.2 It is vital that all members and officers are aware of their responsibilities and remain vigilant; criminal sanctions may be imposed for breaches of legislation.
- 2.3 Failure to comply with the procedures set out in this policy will result in action being considered under the Sanctions Policy. This may include disciplinary action in line with the Officer, or Member, Code of Conduct.

### 3. Definitions and legal background

- 3.1 Money laundering is the process of converting illegally obtained money or assets into 'clean' money or assets with no obvious link to their criminal origin.
- 3.2 There are three primary money laundering offences set out in legislation:
  - Concealing, disguising, converting, transferring, or removing from the UK any criminal property (Section 327 of the Proceeds of Crime Act 2002);
  - Entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (Section 328); and

- Acquiring, using or possessing criminal property (Section 329).
- 3.3 There are also two secondary offences:
  - Failure to disclose any of the three primary offences; and
  - Tipping off (the act of informing a person suspected of money laundering in such a way as to prejudice an investigation).
- 3.4 Any member or employee of the Council may potentially be implicated in money laundering if they suspect money laundering and either become involved with it in some way and/or do nothing about it. The key requirement is to promptly report any suspected money laundering activity to the Money Laundering Reporting Officer.

### 4. The Money Laundering Reporting Officer (MLRO)

4.1 The officer nominated to receive disclosures about money laundering activities within the Council and its Orbis partners is the Auditor Manager for Counter Fraud:

Simon White Audit Manager (Counter Fraud)

Telephone: 0208 541 9191 / 07779 455501 Email: simon.white@surreycc.gov.uk

Telephone: 01273 292573 / 07592 103574 Email: Alex.Mclaren@brighton-hove.gov.uk Room 318, County Hall Penrhyn Road Kingston upon Thames Surrey, KT1 2DN

4.2 In the absence of the MLRO, the Principal Auditor (Counter Fraud) is authorised to deputise:

Alex McLaren Principal Auditor Brighton Town Hall Bartholomew Square Brighton BN1 1JP

#### 5. Procedures

#### Cash

- 5.1 The Council will not accept any cash payment in excess of £5,000 irrespective of whether this is through a single payment or series of linked payments. 'Cash' includes notes, coins, banker's drafts and travellers cheques.
- 5.2 This does not necessarily mean that cash transactions below this value are legitimate and legal. Professional scepticism is encouraged at all times and any suspicions must be reported to the MLRO or their deputy.

#### Responsibilities of members and officers

- 5.3 Any member or officer who suspects money laundering activity must report their suspicion promptly (as soon as practicable) to the MLRO or their deputy if appropriate. If you prefer, you can discuss your suspicions with your line manager first.
- 5.4 Your disclosure must be made at the earliest opportunity following the information coming to your attention, not weeks or months later, and should be made to the MLRO or deputy using the form attached at the end of this policy.

- 5.5 You must follow any subsequent directions from the MLRO or deputy. You must not:
  - Make any further enquiries into the matter;
  - Take any further steps in any related transaction without authorisation from the MLRO or deputy;
  - Disclose or otherwise indicate your suspicions to the person suspected of money laundering; or
  - Discuss the matter with others or make a note on file that a report to the MLRO or deputy has been made unless there is a risk that other officers may progress the matter or a related transaction, as this may alert the suspected perpetrator.

#### Responsibilities of the MLRO

- 5.6 The MLRO or deputy must promptly evaluate any disclosure to determine whether it should be reported to the National Crime Agency (NCA). Any decision not to submit a report to the NCA must be recorded.
- 5.7 If they so determine, the MLRO or deputy must promptly submit an online Suspicious Activity Report (SAR) to the NCA. Alternatively, a SAR may be manually reported to the NCA. Both online and up to date manual reporting forms are available on the NCA's website.
- 5.8 If a disclosure provides the MLRO or deputy with knowledge or reasonable grounds to suspect that a person is engaged in money laundering, and they do not disclose this to the NCA as soon as practicable, the MLRO or deputy will have committed a criminal offence.

#### Risk based approach, customer due diligence and record retention

- 5.9 Under MLR 2017, the Council is obliged to adopt a risk-based approach towards antimoney laundering regulations and how they approach due diligence.
- 5.10 MLR 2017 stipulate risk mitigation policies must be in writing and be proportionate to the risks identified. They must include internal controls over money-laundering and terrorist financing risks. They must also include revised customer due diligence procedures as well as reporting, record keeping and monitoring requirements.
- 5.11 Regulation 18 of MLR 2017 requires a written risk assessment to identify and assess the risk of money laundering and terrorist financing that the Council faces. This will:
  - Assist in developing policies, procedures and controls to mitigate the risk of money laundering and terrorist financing;
  - Help in applying a risk-based approach to detecting and preventing money laundering terrorist financing Inform an assessment of the level of risk associated with particular business relationships and transactions and enable appropriate risk-based decisions about clients and retainers;
  - Inform an assessment of the level of risk associated with particular business relationships and transactions and enable appropriate risk-based decisions about clients and retainers.
- 5.12 In carrying out risk assessments we will take into account information on moneylaundering and terrorist financing risks made available by the Law Society and/or SRA, and risk factors relating to:

- Customers;
- Geographic areas where the Council operates;
- Products and services;
- Transactions;
- Delivery Channels.
- 5.13 Under MLR 2017, there ceases to be "automatic" simplified due diligence requirements for any transactions. Instead, a relevant person needs to consider both customer and geographical risk factors in deciding whether simplified due diligence is appropriate. There are various levels of due diligence as follows:
  - Simplified due diligence is only permitted where it is determined that the business relationship or transaction presents a low risk of money laundering or terrorist funding, taking into account the risk assessment;
  - Enhanced due diligence' (Regulation 33) for those with a high-risk status, for example remote transactions where the customer is not physically present to be identified would require additional appropriate documents to be requested;
  - The 'beneficial owner', the individual that ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted, should be identified;
  - The business relationship should be scrutinised throughout its existence and not just at the beginning.
- 5.14 In all cases, the evidence of the customer identification and record of the relationship/transaction should be retained for at least five years from the end of the business relationship of transaction(s). The records that must be kept are:
  - A copy of, or references to, the evidence of the identity obtained under the customer due diligence requirements in the Regulations;
  - The supporting evidence and records in respect of the business relationships and occasional transactions which are the subject of customer due diligence measures or ongoing monitoring;
  - A copy of the identification documents accepted and verification evidence obtained;
  - References to the evidence of identity.
- 5.15 If satisfactory evidence of identity is not obtained at the outset of the matter then the business relationship or one off transaction(s) cannot proceed any further.
- 5.16 The customer identification procedure must be carried out when the Council is undertaking business in relation to accountancy, procurement, asset management, audit and legal services with a financial or real estate transaction and:
  - Forms a business partnership with a customer;
  - Undertakes a one-off transaction (including a property transaction or payment of a debt) involving payment by or to a customer of £5,000 or more;
  - Undertakes a series of linked one-off transactions involving total payment by or to the customer(s) of £5,000 or more;
  - It is known or suspected that a one-off transaction, or a series of them, involves money laundering;
  - This must be completed before any business is undertaken for that customer..

- 5.15 In the above circumstances, employees must:
  - Identify the person seeking to form the business relationship or conduct the transaction (an individual or company);
  - Verify their identity using reliable, independent sources of information, Identify who benefits from the transaction;
  - Monitor transactions to make sure they are consistent with what you understand about that person or country;
  - Understand the source of their funds;
  - Ensure there is a logical reason why they would want to do business with the Council.
- 5.17 Transaction and business relationship records should be maintained in a form from which a satisfactory audit trail may be compiled, and which may establish a financial profile of any suspect account or customer.
- 5.18 The steps that will be followed to continuously mitigate the risks associated with money laundering are:
  - Applying customer due diligence measures to verify the identity of customers and any beneficial owners obtaining additional information on customers;
  - Conducting ongoing monitoring of the transactions and activity of customers with whom there is a business relationship;
  - Having systems to identify and scrutinise unusual transactions and activity to determine whether there are reasonable grounds for knowing or suspecting that money laundering or terrorist financing may be taking place.
- 5.19 Risks will be reviewed continuously as part of the annual review of the Council Risk Register.

### 6. Guidance and training

- 6.1 The Council will:
  - Make members and officers aware of the requirements and obligations placed on the Council, and on themselves as individuals, by anti-money laundering legislation; and
  - Give targeted training to those considered to be the most likely to encounter money laundering.
- 6.2 Further information can be obtained from the MLRO and the following sources:
  - Anti-money laundering responsibilities from gov.uk: <u>https://www.gov.uk/guidance/money-laundering-regulations-your-responsibilities</u>
  - Anti-money laundering guidance from the Law Society: <u>http://www.lawsociety.org.uk/support-services/advice/articles/quick-guide-to-</u> <u>the-money-laundering-regulations-2017/</u>
  - CIPFA: <u>www.cipfa.org/members/members-in-practice/anti-money-laundering</u>
  - The National Crime Agency: <u>www.nationalcrimeagency.gov.uk</u>

Confidential report to the Money Laundering Rep	oorting	g Off	icer
To: Money Laundering Reporting Office	r		
From:	[in	sert yo	ur name]
Title/Service:	[in	sert yo	ur post title and service]
Telephone:			
Date of report:			
Response needed by:	[e.	g. tran:	saction due date]
Name(s) and address(es) of person(s) involved:	_	_	
[If a company/public body please include details of nature of bo	usiness	]	
Noture value and timing of activity involved			
Nature, value and timing of activity involved: [Please give full details e.g. what, when, where, how. Continu-	0 0 0 0 0 0	onara	to shoot if nocessan/l
	eonae	epara	te sheet ii hecessaryj
	Yes	No	
Has any investigation been undertaken?			
Have you discussed your suspicions with anyone			lf 'yes' please provide details below
else?			
Details of investigation undertaken and/or discus	ssions	s helo	d:

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS

## To be completed by the Money Laundering Reporting Officer

Date report received: Date acknowledged:

Evaluation	
What action is to be taken?	
Are there reasonable grounds to suspect money laundering activity?	
If so, please provide details	

Reporting		
If there are reasonable grounds for suspicion, will a report be made to the NCA?	Yes	🗌 No
If 'no', reasons for non-disclosure		
If 'yes', date of report to NCA		Online / Manual [delete as appropriate]

Consent		
Is NCA consent required for any ongoing or imminent transactions?	Yes	No No
If 'yes', please confirm details		
Date consent received from NCA		
Date consent passed on to officer		

Other relevant information

Signed

Date:

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS

# Agenda Item 6

Report to:	Governance Committee
Date:	22 January 2019
By:	Assistant Chief Executive
Title of report:	Appointments to Outside Bodies
Purpose of report:	To receive an update in relation to appointments to outside bodies

**RECOMMENDATIONS:** The Governance Committee is recommended to:

- (1) appoint a councillor, nominated by the Leader of the Independent Group, as a Council representative on the East Sussex Fire Authority for the period to May 2021 ; and
- (2) appoint a councillor as the Council's representative on the Local Government Association Coastal Issues Special Interest Group for the period to May 2021

#### 1. Supporting Information

1.1 The County Council is invited to appoint Members (and in some cases non-County Councillors are eligible) to serve on a wide range of outside bodies whose role has a relationship to a function of the County Council. The appointments are a vital part of the County Council's working in partnership with voluntary bodies, statutory agencies and the public and private sectors.

East Sussex Fire Authority

1.2 In May 2017 the Council agreed to appoint various councillors to the East Sussex Fire Authority based on the following allocation of places to Groups in accordance with the political balance provisions. Councillor Earl was appointed as the Independent Group representative by the Council.

Conservative – 7 Liberal Democrat – 3 Labour – 1 Independent Group - 1 Independent Democrat - 0

1.3 The Leader of the Independent Group has been contacted and any nomination received to fill the vacancy will be reported to the Committee at the meeting.

Local Government Association Coastal Issues Special Interest Group

1.4 In May 2017, Councillor Earl was appointed as the Council's representative on the Local Government Association Coastal Issues Special Interest Group and the Committee therefore needs to consider who to appoint to fill the vacancy.

1.5 The Coastal Issues Special Interest Group considers issues such as funding of coast protection, regeneration of coastal economies, and coastal management and environmental issues.

1.6 Any nominations received from Groups will be reported at the meeting.

#### 2. Recommendations

2.1 The Committee is asked to agree to the appointment of a councillor to the East Sussex Fire Authority (nominated by the Leader of the Independent Group) and a councillor as the Council's representative on the Local Government Coastal Issues Special Interest Group for the period until May 2021.

PHILIP BAKER Assistant Chief Executive

Contact Officer: Andy Cottell

Tel: 01273 481955 E-mail: andy.cottell@eastsussex.gov.uk

Background Documents None

# Agenda Item 7

Report to:	Governance Committee
Date of meeting:	22 January 2019
By:	Chief Operating Officer
Title:	LMG Managers Pay 2019/20
Purpose:	To appraise the Governance Committee on the considerations in relation to the LMG pay award for 2019/20.

#### RECOMMENDATIONS

The Governance Committee is recommended to agree the pay award for LMG Managers for the financial year 2019/20 as being 2%, in line with the national (NJC) award.

#### 1 Background

1.1 LMG Managers' pay is locally negotiated with Unison and reported to the Governance Committee on an annual basis, to approve the pay offer and any subsequent settlement. Two reports are therefore presented: the first, in January, seeking agreement to the offer and the second, in March, finalising the offer following local negotiations with Unison in January/February.

1.2 The national (NJC) pay award is relevant to these local negotiations as the decision made regarding the local pay offer needs to take into account the impact on the wider workforce and organisation as a whole. In addition, there is an overlap between LMG1 and the top of the Single Status pay range (SS13) which applies to specialist professional posts, such as Senior Practitioners in Adult Social Care and Children's Services. It is therefore important to ensure that these two grades remain comparable and that the relativities do not widen too far.

1.3 Set against this background, the local pay award for LMG Managers has therefore historically mirrored the national award. Any consideration of a pay increase must, however, take into account the savings targets and significant financial challenges facing the Council, as well as any Government pay policy for the public sector.

#### 2 Supporting information

2.1 The annual Consumer Prices Index (CPI) inflation measures changes in the price level of consumer goods and services purchased by households. On 21 March 2017, the CPI was replaced by a new measure: the Consumer Prices Index, including owner occupier's housing costs (CPIH). This extends the CPI to include a measure of the costs associated with owning, maintaining and living in one's own home (owner occupiers' housing costs OOH), along with council tax. This is the most comprehensive measure of inflation. The CPIH 12 month rate between October 2017 and October 2018 stood at 2.2% (Office for National Statistics, November 2018); down from 2.8% in October 2017.

2.2 For the three months ending October 2018, the median pay settlement for the private sector was 2.5%, whereas in the public sector it was 2%. The median for the whole economy was 2.3% (Xpert HR, October 2018). Overall, average weekly earnings for employees in Great Britain in real terms (that is, adjusted for price inflation) increased by 0.9% to 2.2% including bonuses compared with a year earlier (Labour Market Statistics, ONS).

2.3 The wastage figure for voluntary leavers among LMG Managers (e.g. resignations) for the half year period April to Sept 2018 is 4.03%. For comparison purposes, for the period April to Sept 2017 it was 2.54% and for April to Sept 2016, 2.63%

#### Pay Negotiations 2018-20

2.6 The national NJC local government services reached a two-year pay deal in April 2018 covering the period 1 April 2018 to 31 March 2020. The two-year deal provided for pay increases of 2% each year on salaries at the top end of the scale (lower at the bottom to account for national living wage increases).

2.7 LMG Managers received a pay award of 2% for the financial year 1 April 2018 to 31 March 2019 to mirror the national NJC award. It was decided that no decision about the second year (April 2019 to 31 March 2020) would be made at that time to enable the prevailing market position at the relevant time to be taken into account.

#### Benchmarking

2.8 An assessment of the market position in relation to key LMG grades has been undertaken: firstly, in respect of other local authorities, including our neighbours, and secondly, in respect of a wider public sector dataset through Korn Ferry Hay (KFH), specialist pay consultants.

2.9 Appendix 1 provides high level benchmarking data in relation to other similar sized local authorities and our closest neighbours. As can be seen from this, the LMG grades are within the lower to median quartile range of local authorities.

2.10 Appendix 2 provides high level benchmarking data in relation to the wider public sector dataset provided by KFH. Again, this shows the LMG grades are within the lower to median quartile range, with the majority of grades being in the lower quartile.

2.11 In the context of the core offer and significant financial challenges facing the Council, it is recognised that there is a level of scrutiny on pay for managers. It is, however, equally important that the Council is able to attract and retain high calibre staff to manage the complex range of services provided by the Council. Whilst acknowledging that pay is only one element of the overall employment package, it is, nonetheless, an important one. Both sets of benchmarking data show that pay for our managers is in the lower to median quartile ranges. Given this backdrop, it would seem appropriate to offer a 2% pay award as provided for in the second year of the national pay award. On LMG1, this would equate to a per annum increase of £828 gross; on LMG5, £1329 gross.

#### Financial Implications

2.8 The LMG pay bill is approximately £26.4m per annum including on-costs. If the national NJC pay award were mirrored, this would provide for an offer of 2% in 2019/20, which would cost approximately £528,500 including on-costs.

2.9 Revenue budgets for 2019/20 have been prepared with provision for a pay award of 2%.

2.10 Attached at Appendix 3 is a copy of the current LMG salary scales showing the impact of a 2% uplift.

#### 3. Recommendations

3.1. The Governance Committee is recommended to agree the pay award for LMG Managers for the financial year 2019/20 as being 2% (in line with the national NJC award).

#### KEVIN FOSTER Chief Operating Officer

Contact Officers: Sarah Mainwaring, Head of HR & OD Tel. No. 01273 482060 Email: <u>sarah.mainwaring@eastsussex.gov.uk</u>

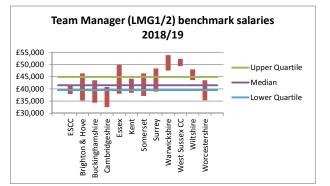
Ruth Wilson, Lead Consultant – Pay and Reward Tel No 01273 481762 Email: <u>ruth.wilson@eastsussex.gov.uk</u>

#### Appendix 1

#### Comparison against similar sized or neighbouring authorities

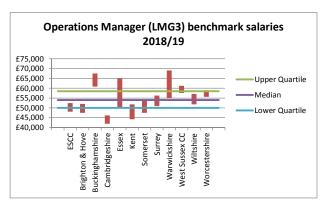
Team Manager (LMG 1/2)

	М	Min Salary		ax Salary
ESCC	£	37,892	£	41,408
Brighton & Hove	£	35,229	£	46,326
Buckinghamshire	£	34,322	£	43,547
Cambridgeshire	£	32,500	£	40,800
Essex	£	38,000	£	50,000
Kent	£	38,415	£	44,209
Somerset	£	37,107	£	46,347
Surrey	£	38,888	£	48,395
Warwickshire	£	47,512	£	53,845
West Sussex CC	£	49,391	£	52,310
Wiltshire	£	39,002	£	41,846
Worcestershire	£	35,288	£	43,522



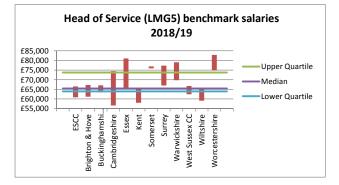
**Operations Manager (LMG 3)** 

ESCC f Brighton & Hove f Buckinghamshire f	,	£	52,469
0	E 47,483	f	
Buckinghamshire £		L	52,064
	60,812	£	67,501
Cambridgeshire f	E 41,900	£	46,150
Essex f	E 50,000	£	65,000
Kent f	E 44,210	£	51,779
Somerset f	E 47,499	£	53,742
Surrey f	E 50,903	£	56,261
Warwickshire f	E 55,005	£	69,117
West Sussex CC	E 57,549	£	61,270
Wiltshire f	51,763	£	57,066
Worcestershire f	E 55,599	£	59,001



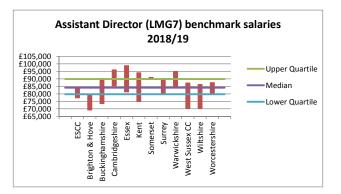
#### Head of Service (LMG 5)

	Min Salary		Max Salary	
ESCC	£	60,844	£	66,489
Brighton & Hove	£	61,222	£	67,286
Buckinghamshire	£	63,558	£	67,054
Cambridgeshire	£	56,600	£	74,500
Essex	£	65,000	£	81,000
Kent	£	58,021	£	65,683
Somerset	£			75,897
Surrey	£	66,976	£	77,297
Warwickshire	£	69,772	£	79,076
West Sussex CC	£	62,459	£	66,756
Wiltshire	£	59,120	£	65,176
Worcestershire	£	74,818	£	82,892



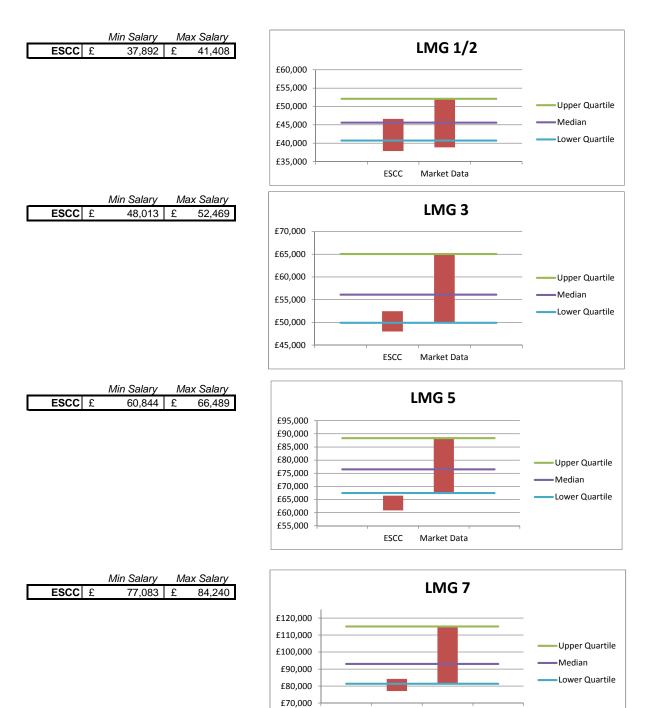
#### Assistant Director (LMG 7)

	Min Salary		Max Salary	
ESCC	£	77,083	£	84,240
Brighton & Hove	£	68,986	£	79,599
Buckinghamshire	£	73,280	£	90,469
Cambridgeshire	£	84,892	£	96,230
Essex	£	81,000	£	99,000
Kent	£	74,677	£	94,305
Somerset	£			90,213
Surrey	£	79,389	£	90,469
Warwickshire	£	84,038	£	95,239
West Sussex CC	£	70,000	£	87,500
Wiltshire	£	69,963	£	86,621
Worcestershire	£	79,659	£	87,741



#### Appendix 2

#### Comparison against Korn Ferry Hay data set



ESCC

Market Data