



ANNUAL GOVERNANCE STATEMENT – 2020/2021

1.0 Introduction

- 1.1 This is the Council's Annual Governance Statement for 2020/21. It provides an opinion on the Council's governance arrangements, a review of the effectiveness of the governance statement, an update on the actions agreed in last year's statement and issues identified in 2020/21.
- 1.2 The Council adopted a Code of Corporate Governance which reflects the principles and is consistent with the CIPFA/SOLACE Framework, "Delivering Good Governance in Local Government" 2016. This framework requires that local authorities are responsible for ensuring that;
- Their business is conducted in accordance with all relevant laws and regulations.
 - Public money is safeguarded and properly accounted for.
 - Resources are used economically, efficiently and effectively to achieve priorities which benefit the local authority.
- 1.3 All Councils are required to produce an Annual Governance Statement (AGS) and review their governance arrangements at least once a year. The Accounts and Audit (Amendment) Regulations 2020 have amended the timing of the review and publication of the 2020/21 financial statements.
- 1.4 Covid 19 has had a significant impact on the delivery of council services and new arrangements that were implemented during 2020/21. The Council participated in the multi-agency response to the emergency as part of the Surrey Local Resilience Forum. The impact of the pandemic on governance has been identified in a separate section in this report.

2 Corporate Governance

- 2.1 Corporate governance is the process by which the Council directs, controls and is held to account. The Council's governance framework aims to ensure that in conducting its business it:
- Operates in a lawful, open, inclusive and transparent manner;
 - Makes sure that public money is safeguarded, properly accounted for and used economically, efficiently and effectively
 - Has effective arrangements for the management of risk and;
 - Secures continuous improvements in its governance

- 2.2 Strategy & Resources Committee approved the Council's Code of Corporate Governance on 4 April 2017. The Code is based on the seven new principles within the Chartered Institute of Public Finance (CIPFA)/ Society for Local Authority Chief Executives (SOLACE) Framework 2016. The Code summarises the Council's internal arrangements; each section looks at how the Council accounts for the principles. The Council acknowledges that it is responsible for ensuring that there is a sound system of governance and internal control compliant with its adopted principles within the local code. A high level summary is included in this document.

3 Compliance with the Principles

3.1 PRINCIPLE A- Behaving with Integrity, demonstrating strong ethical values and respecting the law

This is achieved by:

- 3.2 The Council's Constitution lays out compliance with legislation and includes;
- Codes of conduct which define our standards and behaviour and deals with Conflicts of interest
 - Whistleblowing procedures
 - Financial Regulations and Contract Standing Orders
 - Anti-Fraud and Corruption Strategy and the Anti-Bribery Policy
 - Rules relating to Members external interests
 - Rules relating to Gifts and Hospitality
 - Codes of Conduct for Members and Officers
 - Scheme of Delegation to officers
 - Information Security Policy
 - Information Governance Policy
 - Money Laundering Policy
- 3.3 The Monitoring Officer has specific responsibility for ensuring legality and investigating issues to ensure compliance with laws and regulations.

3.4 PRINCIPLE B - Ensuring openness and comprehensive stakeholder engagement.

This is achieved by:

- 3.5 Documenting a commitment to openness and acting in the public interest.
- 3.6 Establishing clear channels of communication with different sectors of the community and other stakeholders, ensuring accountability and encouraging open consultation.
- 3.7 Ensuring an effective scrutiny function is in place.
- 3.8 PRINCIPLE C - Defining outcomes in terms of sustainable economic, social and environmental benefits.**

This is achieved by:

- 3.9 Developing and communicating a vision which specifies intended outcomes for citizens and service users and is used as a basis for planning.

3.11 PRINCIPLE D - Determining the interventions necessary to optimise the achievement of the intended outcomes.

This is achieved by:

- 3.12 Translating the vision into courses of action for the Council, its partnerships and collaborations.
- 3.13 Reviewing the effectiveness of the decision making framework, including delegation arrangements, decision making in partnerships, information provided to decision makers and robust data quality.
- 3.14 Measuring the performance of services and related projects and ensuring that they are delivered in accordance with defined outcomes and that they meet the agreed use of resources and value for money.

3.15 PRINCIPLE E- Developing the Council's capacity, including the capability of its leadership and the individuals within it.

This achieved by:

- 3.16 Defining and documenting the roles and responsibilities of members and management with clear protocols for effective communication in respect of the Council and partnership arrangements.
- 3.17 Ensuring effective arrangements are in place for discharging the duties of the Head of Paid Service.
- 3.18 Providing induction and identifying the development needs of members and senior management.

3.19 PRINCIPLE F - Managing risks and performance through robust internal control and strong public financial management.

This is achieved by:

- 3.20 Reviewing the effectiveness of the framework for identifying and managing risks and for performance and then demonstrating clear accountability.
- 3.21 Ensuring effective counter fraud and anti-corruption arrangements are developed and maintained in accordance with the Code of Practice on managing the risk of fraud and corruption (CIPFA 2015).
- 3.22 Independent review of the internal controls by Internal Audit when carrying out assessments of key activity areas.

3.23 PRINCIPLE G - Implementing good practices in transparency, reporting, and audit, to deliver effective accountability.

This achieved by:

- 3.24 Ensuring that assurance arrangements conform to the governance requirements of the CIPFA statement on the Role of the Head of Internal Audit (2010) and where they do not, explain why and how they deliver the same impact.
- 3.25 Undertaking the core functions of an audit committee, as defined in audit Committee, Practical Guidance for Local Authorities and Police (CIPFA 2013).
- 3.26 Ensuring that the Council provides timely support and information and responses to external auditors and properly considers audit findings and recommendations.

4. How do we know that our arrangements are working?

4.1 The Code of Corporate Governance requires assurance upon:

- Delivery of the Council's Corporate Plan and the Key Priorities
- Services delivered economically, efficiently and effectively
- Management of risk
- Financial planning and performances
- Effectiveness of internal controls
- Community engagement and public accountability
- Project management and project delivery
- Governance of shared services and alternative services delivery modules
- Procurement processes
- Roles and responsibilities of members and officers
- Standards of conduct and behaviour
- Training and development of members and officers
- Compliance with laws and regulations, internal policies and procedures
- Records keeping

4.2 Sources of Assurance

- Constitution and scheme of delegation
- Council Meetings and Full Council
- Corporate Plan and Service delivery plans
- Performance Management Framework
- Risk Management Framework
- Project Management methodology
- Medium Term Financial Strategy and budget monitoring
- Complaints Policy
- HR Policies and procedures
- Whistleblowing policies
- Organizational Development Strategy

- Training for Members and Officers
- External Audit and Internal Audit
- Role of Head of Paid Service (Chief Executive), Section 151 Officer (Chief Finance Officer) and Monitoring Officer (Chief Legal Officer)
- Member Officer Protocol
- Role of Audit, Crime & Disorder and Scrutiny Committee.

4.3 Assurances Received and Review of Effectiveness

- All Heads of Service are required to complete a Divisional Assurance Statement.
- The Statutory Officers were consulted on the review process and their roles and responsibilities and consulted on the outcome.
- The Chief Executive and the Chair of Strategy and Resources sign the AGS.
- Any frauds reported and complaints to the Ombudsman are reviewed.
- The Head of Internal Audit's Opinion for 2020/21 is taken into account, and comments made by external audit and other external reviews.
- Performance and performance indicators are reviewed.
- We have made progress in implementing the action plan from 2019/20, as set-out in section 15.
- The Leadership Team assists with good governance in delivering key services and making corporate decisions and monitors performance.
- Key management roles are defined and are within the Leadership Team.
- The Council's finances are driven through the Medium Term Financial Strategy. The Council sets an annual budget which is regularly monitored and reviewed and the Council's financial systems and processes are regularly audited.

4.4 Opportunities to improve

This AGS builds upon previous AGS's. All the key governance mechanisms remain in place. This documents includes any changes to the key governance systems and an update of the significant governance arrangements in 2019/20.

5 The Council and how it functions

- 5.1 The Council is a committee authority where policies and decisions are determined and scrutinized.
- 5.2 The Council has the following committees in place; Audit, Crime & Disorder and Scrutiny, Licensing and Planning Policy, Community & Wellbeing, Environment and Safe Communities, Strategy & Resources, Planning and Standards.
- 5.3 The Council's Regulatory and Advisory Committees/Panels include; Licensing (Hearing and General) Panels, the Appointments Panel, Financial Policy Panel, Health Liaison Panel, Human Resources Panel and the Shareholder Sub-Committee.

- 5.4 In addition the joint committees and outside bodies include; Epsom and Walton Downs Conservators, Epsom & Walton Downs Consultative Committee and the Nonsuch Park Joint Management Committee.
- 5.5 The Constitution sets out the roles and responsibilities and there is a terms of reference for each committee/body.
- 5.6 Meetings are open and all agenda papers, reports and decisions can be found on the Council's website and partnership risks are identified in committee reports. Details of all consultations and surveys are also available. The Council's budget and financial statements are available through the website. The website also highlights all completed and approaching public consultations.
- 5.7 The management structure is available on the Council's website. The Chief Executive is the Head of Paid Service. During 2020 the role of Chief Operating Officer was replaced by the role of Director of Environment, Housing & Regeneration. These posts meet regularly and also are part of the Leadership Team.

6 Significant operational events in 2020/21

- 6.1 The Local Government Boundary commission for England has been undertaking an electoral review to recommend new ward boundaries. A draft submission for the consultation was submitted in March but the final outcome will be published in February 2022
- 6.2 In March 2021, the Local Government Association undertook a Finance Peer Review. This focused on five themes - Financial Leadership; Financial strategy, planning & forecasting; Decision-making; Financial outcomes; Partnership & Innovation. The review found that the Council had a strong prudent financial management but also highlighted some areas for consideration to strengthen the Council which have been developed into an agreed action plan. This includes a review of the approach to financial decision making and scrutiny.

7 Reflecting the challenges from Covid 19 – Impact on Governance

- 7.1 This section considers the impact of Covid and any conclusion on the adequacy of the governance arrangements in place.
- 7.2 There has been significant impact as a result of local and national restrictions, both in delivering new services and supporting residents and businesses and delivering services as usual. All key services have remained available through a variety of channels. Our reception area was opened for a short period in November as regulations allowed, but most contact has been remotely
- 7.3 Changes and new areas of activity as part of the national response to coronavirus and any governance issues arising included;

- Delivery of virtual meetings after the MHCLG laid recommendations before parliament in April 2020 to provide flexible meetings between 4th April 2020 and 6th May 2021. These regulations enabled the Council to hold all meetings virtually. This was set up on a new app and a survey of members was undertaken to review the adequacy of arrangements.
- We have worked closely with the community and voluntary sector.
- Housed all rough sleepers through the “everyone in programme”.
- Provided Covid 19 regulatory advice to businesses through the Environmental Health Team, with pressures brought on traditional Environmental health work. This includes enforcement to protect the public and to ensure businesses are educated and supported to maintain standards.
- We have worked hard to ensure residents have been kept informed with dedicated webpages created and continually updated.
- We have also cascaded information through a range of channels, with regular staff and members briefings.
- The government published “Working safely during Coronavirus “on 11th May 2020. This created a significant amount of work to ensure buildings and services were subject to health and safety measures to be Covid Secure. To maintain essential services, the Council procured and supplied necessary PPE.
- Payments to residents who must self isolate have been processed through the government’s Test & Trace Scheme.

7.4 The Council created a Community Hub on 24 March 2020 which was stood down in June and then re-established to support the most vulnerable residents, with protocols and processes all documented. The data on clinically vulnerable was distributed to the Hub and had to be controlled and monitored.

7.5 The Council also put in place processes to pay grants to eligible businesses and self-isolation payments to residents. The first grants were announced in March 2020 and since then 10 further grants have been processed and paid by the Revenues and Benefits Team. In May, Local Restrictions Grants were introduced for some businesses that did not qualify for other grants. In addition, a series of business rate reliefs were introduced to further support businesses.

7.6 As a result of the pandemic, the Internal Audit Plan was updated to reflect the changes, new systems and processes, and to provide additional assurances over our arrangements. The delivery of the internal audit plan was impacted but has not affected the ability to provide a Head of Internal Audit’s year end opinion. All outstanding audits will be completed within quarter 1 in 21/22.

Funding of the Response

7.7 The financial impact for 2020/21 is significant although the council has received a number of government grants. The grants received and budget variances are monitored and have been reported to Strategy & Resources Committee during the year.

- 7.8 The provisional financial outturn and funding position for 2020/21 is due to be reported to Strategy & Resources in July 2021.

8 Managing Risks

- 8.1 All Members and officers are responsible for ensuring that the risk implications are considered and included when making decisions and planning services. To deliver services and key priorities the Council must manage its risks and opportunities.
- 8.2 Significant risks are recorded in the Leadership Risk Register which is managed and monitored. The Leadership Team reviews this every 6 months. The risk register is used to formulate the internal audit plan. The service risks are identified from the Divisional Assurance Statements completed by the Heads of Services. The Risk Management Framework is reviewed annually and was reported to the Audit, Crime & Disorder Committee in November. The Leadership Risk Register is currently being updated.
- 8.3 The Council's IT systems are regularly audited and the Council has an IT Security & Acceptable Use Policy and IT Information Assurance Policy.

9 Managing Fraud

- 9.1 The Council's Whistleblowing Policy is part of the Constitution which is available on the Council's website. The Council also has an Anti-Fraud and Anti-Corruption Strategy which supports the culture of honesty and opposing fraud and corruption. This strategy was last reviewed in 2019.
- 9.2 There has been an increased risk of fraud during 2020/21 due to Covid support grants for businesses. Checks have been put in place to check any fraudulent business transactions and regular updates and awareness bulletins received from the National Anti-Fraud Network.

10 Managing Resources

- 10.1 The Council continues to manage the effect of austerity measures and now Covid-19 through its Medium Term Financial Strategy and has introduced some new initiatives.
- 10.2 The Council is required to set a balanced budget on an annual basis. The budget sets out how much money will be spent on services, invested in projects and the level of Council tax for individual residents. The level of Council Tax also includes tax required by Surrey County Council and Surrey Police & Crime Commissioners Office although it has no control over the amount set by these bodies.

11 Responsibility of the Chief Finance Officer

- 11.1 The Chief Finance Officer is responsible for delivering and overseeing the financial management arrangements for the Council. He is part of the Council's Leadership Team and reports directly to the Chief Executive. These arrangements, both in design and in day to day practice, enable the financial aspects of material business decisions to be given due weight.
- 11.2 The Council maintains an effective system of financial control which is clearly set out within the Council's financial regulations and procedure rules. Control and oversight is facilitated by an effective internal audit function and underpinned by a strong culture of careful management of public money demonstrated by all managers. The effectiveness of the control environment can be evidenced through the Council's recent history of financial outturns and the timeliness and quality of the financial statements and other financial returns.
- 11.3 The Chief Finance Officer is the Council's S.151 Officer and in accordance with the statutory requirement has the relevant accountancy qualification and significant local government experience. In the opinion of the Chief Finance Officer, the Council's finance function is adequately resourced and contains a mix of staff with the appropriate levels of professional qualifications and experience.
- 11.4 The Chief Finance Officer is involved in the preparation of the Annual Governance Statement.

12 Managing Performance

- 12.1 The Council's performance management arrangements use a RAG system (red/amber/green). Targets are set annually based on the Council's Four Year Plan. The relevant Heads of Service and Committee Chairmen are consulted on proposed targets. The Audit, Crime & Disorder and Scrutiny Committee receives and reviews all key priority targets, although accountability rests with the relevant Head of Service. A report on performance against the 2020/21 year end priority targets identified that 63% of all targets were achieved. This was slightly lower than in previous years but 5 of the targets were only narrowly missed which would have increased overall performance to 72%.

13 Stakeholder Engagement & Partnership working

- 13.1 The Council has a two stage procedure for addressing complaints. This is clearly laid out in our procedure backed by the customer charter. **In 2020/21, (awaiting new figures)** For 19/20 - 502 complaints were received, of these 73% were resolved within 15 days. 39 complaints escalated to Stage 2 and of these 64% were resolved within 15 days. There was an improvement in both the number of Stage 1 and Stage 2 complaints resolved in 15 days from 2018/19 The number of complaints to the Ombudsman forms part of this procedure and an annual report is received. For 2020 the Ombudsman reported that a total of 12 complaints were referred to the Ombudsman with none upheld. **The data for 2021 is awaited.**

- 13.2 Data is published on the website to meet the requirements of the Local Government Transparency Code. An audit undertaken in 2019/20 on information governance identified gaps and some of the recommendations have still to be implemented, principally due to a focus on the Covid-19 response. Officers are working to implement the recommendations in the current year.
- 13.3 The Southern Internal Audit Partnership who provide internal audit services has a key Stakeholder Board, in accordance with the Partnership Agreement and the Head of Policy, Performance & Governance sits on the Board.
- 13.4 Insurance is provide in partnership with the London Borough of Sutton who regularly report on contract arrangements and provide an annual report
- 13.5 The Council agreed in July 2020 to establish a new Community Safety Partnership, the Epsom & Ewell CSP to improve how it serves the needs of Borough residents. The EECSP has set 4 key priorities.

14 Internal Audit and External Audit Assurance

- 14.1 Internal audit is a key element of the governance arrangements and provides an independent, risk based approach.
- 14.2 Internal Audit has been delivered by the Southern Internal Audit Partnership since 2019 (SIAP). SIAP was established in 2012 and is hosted by Hampshire County Council and is one of the largest providers of public sector internal audit in the region.
- 14.3 SIAP have been externally assessed as compliant with the Public Sector Internal Audit Standards. In September 2020 the Institute of Internal Auditors were commissioned to complete an external assessment of the SIAP. It confirmed that “SIAP conforms to the definition of Internal Auditing, the Code of Ethics and the standards”
- 14.4 In accordance with these practices (Public Sector Internal Audit Standards), and the Internal Audit Charter the Chief Internal Auditor provides a written status report to the Leadership Team and the Audit, Crime & Disorder and Scrutiny Committee, summarising the status of ‘live’ internal audit reports; an update on progress against the annual audit plan; a summary of internal audit performance, planning and resourcing issues; and a summary of significant issues that impact on the Chief Internal Auditor’s annual opinion. Internal audit reviews culminate in an opinion on the assurance that can be placed on the effectiveness of the framework of risk, management, control and governance designed to support the achievement of management objectives of the service area under review. A large part of the internal audit plan for 2020/21 has been delivered and includes adequate coverage of IT. The Head of Internal Audit’s opinion is stated below;

Annual Internal Audit Opinion 2020-2021

“I am satisfied that sufficient assurance work has been carried out to allow me to form a reasonable conclusion on the adequacy and

effectiveness of Epsom & Ewell Borough Council's internal control environment.

In my opinion, Epsom & Ewell Borough Council's framework of governance, risk management and control is 'Reasonable' and audit testing has demonstrated controls to be working in practice.

Where weaknesses have been identified through internal audit review, we have worked with management to agree appropriate corrective actions and a timescale for improvement."

- 14.5 The Audit, Crime & Disorder and Scrutiny Committee carries out the role of an Audit Committee as identified in CIPFA's "Audit Committees – Practical Guidance for local authorities". The Committee produces an Annual Report to Council which covers the work of internal audit. This Committee meets throughout the year and monitors specific areas of governance including performance management, risk management and internal audit; it receives the Head of Internal Audit's Year end opinion. As a Scrutiny Committee, it also conducts a number of specific reviews.
- 14.6 In 2020/21, the Committee met 3 times including one special meeting to approve the 19/20 Annual Governance Statement and reviewed progress against the audit plan, progress in implementing recommendations, and risk management arrangements. The Committee annually reviews how effective it has been in overseeing the arrangements in their annual report to Council.
- 14.7 External Audit is provided by Grant Thornton, who were appointed through Public Sector Audit Appointments Ltd (PSAA). The statutory accounts have been audited and Grant Thornton have issued an unqualified opinion and value for money assurance.

15 Issues from 2019/20

- 15.1 The implementation of the actions identified in 2019/20 have been monitored and reported in detail to the Audit, Crime & Disorder and Scrutiny Committee as part of the arrangements for approving the AGS.

Issues identified for 2019/20	Action taken to date
The financial impact of Covid and further losses in future years depending on the outcome of the fair funding review and funding available.	The on-going financial impact has been regularly reviewed and reported to Financial Policy Panel and Strategy & Resources Committee. The Chief Finance Officer equally reports to MHCLG on current impact. A register of all grants received is maintained.
Organisational capacity was significantly challenged whilst responding to the emergency and	The service delivery plan for 2019/20 was updated to reflect the impact of the pandemic.

<p>this will continue for a number of months.</p>	<p>Capacity to support the further impact of the pandemic, a surge or other incidents is an ongoing challenge and is closely monitored.</p> <p>The Council is undertaking a restructure in 2021 to improve capacity and resilience</p>
<p>The updated Local Plan programme as agreed in June 2019 was delayed by Covid which delayed the Regulation 18 consultation.</p>	<p>A new timetable was agreed by the Licensing, Planning Policy Committee on 4 March 2021 The deadline for the estimated date of adoption is December 2023.</p>
<p>Emergency response to Covid-19.</p>	<p>A report on lessons learnt from the Covid-19 pandemic went to the Audit, Crime & Disorder and Scrutiny Committee in April 2021.</p> <p>The major incident status in Surrey was stood down on 28th April 2021 and the Council worked with partners to support the emergency response.</p> <p>We continue to work with partners to deliver ongoing support requests as required.</p> <p>Internally the Emergency Plan has been reviewed and updated with the Emergency Assistance Centre Plan. Training is also being rolled out by Applied Resilience, the Council's Emergency planning provider.</p>
<p>Review and strengthen compliance with policies, procedures and legislative requirements for procurement.</p>	<p>This is an on-going area for improvement and captured in the 20/21 AGS.</p> <p>The contract register was updated to capture all contracts and will be regularly refreshed.</p> <p>The Contract Standing Orders are under review and will be reported to S&R in November with the updated Financial Regulations.</p>
<p>Significant work has been undertaken on the health and safety framework in 19/20, but there is additional risks to be managed due to the impact of the Covid Secure requirements.</p>	<p>Over 80 Covid Secure documents and risk assessments have been completed to ensure compliance and will be overseen by the Corporate Health & Safety Group.</p> <p>As more services return and officers return to work these arrangements will be reviewed and updated in line with government guidance.</p>
<p>Due to Covid-19, the annual performance report against the</p>	<p>The 2019/20 year-end performance report was presented to the Audit, Crime &</p>

2019/20 key priority targets has not yet been finalized for Audit, Crime & Disorder and Scrutiny Committee.	Disorder and Scrutiny Committee in November 2020.
The new Corporate/Four Year Plan was published and then immediate impacted by Covid	The Build Back Better Programme has been developed to promote the Council's priorities as confirmed by Strategy & Resources Committee on 16 th March 2021.
Due to Covid-19, the annual report from Audit, Crime & Disorder and Scrutiny Committee on the work of internal audit in 2019/20, has not yet been presented to Full Council.	The report was produced and presented to Full Council on 8 th December 2020
The Council's Equality and Diversity Policies are in need of updating.	The Council's Equity, Inclusion and Diversity Policy was updated and consulted on. It was approved by the Strategy & Resources Committee on 30 th March 2021

16 Conclusion and significant governance issues 2020/2021

- 16.1 The Council is satisfied that the appropriate governance arrangements are in place, however it remains committed to maintaining and where required improving those areas. The key issues to be addressed in 2020/21 are listed below and these will be reviewed and monitored with a detailed action plan.

Issues identified for 2020/21	Action to be undertaken taken
<p>Funding shortfall caused by sustained losses to income and increased costs due to long-term impact of Covid-19 on Council services.</p> <p>Potential reduced funding from New Homes Bonus Grant and further losses in future years depending on outcome and timing of government reviews into Fair Funding and Business Rates.</p>	<p>Budget monitoring and utilisation of government financial support schemes for Local Authorities.</p> <p>Delivery of existing MTFS planned service savings and new savings identified in January 2021.</p> <p>Strategic Asset Reviews undertaken in 2021/22.</p> <p>Production of new budget for 2022/23 to factor in updated income and expenditure levels following Covid-19.</p>
The full impact of the pandemic is unlikely to be clear until out of current national lockdown and all restrictions lifted	The service delivery plan and annual plan need be flexible to reflect the recovery plans, new and adapted services and backlogs, and new demands created as a

Covid 19 Recovery Plan will need to assess both the medium and longer term impact on the economy and the community	result of the pandemic These will be monitored and reviewed regularly. The Recovery Plan will be monitored and regularly updated by Senior Leadership Team
The Council need to build upon the digital improvements and opportunities resulting from the pandemic	The ICT Road Map will be updated and developed to ensure digital progress..
There are challenges in delivering effective data security management	A health check of the arrangements for data management should be undertaken and training provided

Statement of the Chair of Strategy and Resources & Chief Executive

We have been advised of the result of the review of the effectiveness of the arrangements by senior officers and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework.

Signed:

.....

Chair of Strategy and Resources

Date

Signed:

.....

Chief Executive

Date