

RUSHMOOR BOROUGH COUNCIL

ANNUAL CORPORATE GOVERNANCE STATEMENT 2015/16

1 SCOPE OF RESPONSIBILITY

- 1.1 Rushmoor Borough Council ("the Council") is responsible for ensuring that its business is conducted in accordance with the law and proper standards and that public money is safeguarded and properly accounted for and used economically, efficiently and effectively. The Council also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2 In discharging this overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions and which include arrangements for the management of risk.
- 1.3 The Council approved and adopted a revised Code of Corporate Governance on the 10th July 2014, which is consistent with the principles of the CIPFA/SOLACE Framework Delivering Good Governance in Local Government (based on the December 2012 addendum). A copy of the Code is available on the Council's website. CIPFA published Delivering Good Governance in Local Government: Framework (2016 Edition) in April 2016 and the Council will review its Code of Corporate Governance against this framework in the forthcoming year.
- 1.4 This statement explains how the Council has complied with the Code and also meets the requirements of the Accounts and Audit Code of Regulations 2015, regulation 6(1), which require all relevant public bodies to prepare an annual governance statement.

2 THE PURPOSE OF THE GOVERNANCE FRAMEWORK

- 2.1 The governance framework comprises the systems, processes, culture and values, by which the Council is directed and controlled and the activities through which it accounts to, engages with and leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective value for money Services.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of

the Council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and to manage them efficiently, effectively and economically.

- 2.3 The governance framework has been in place at the Council for the year ended 31st March 2016 and up to the date of the approval of the Council's Statement of Accounts.

3 THE GOVERNANCE FRAMEWORK

- 3.1 The key elements of the systems and processes that comprise the Council's governance arrangements are as described below and include arrangements for:

Identifying and communicating the authority's vision of its purpose and intended outcomes for citizens and service users

- 3.2 There is a clear vision of the Council's purpose and intended outcomes for citizens and service users communicated within the organisation and to stakeholders. This is set out in the Rushmoor Borough Council Corporate Plan 2015-2016 as "working with others to improve the quality of people's lives". This document has been informed by the Rushmoor Strategic Partnership Sustainable Community Strategy (SCS) 2010-2026 prepared by the Rushmoor Strategic Partnership, a non-statutory, non-executive organisation working within the boundaries of Rushmoor bringing together the skills of the public, private, voluntary and community sectors when working at a local level. This document sets out the partners' vision for the future and the key priorities for the future. The vision and priorities from the SCS have been reflected in the Corporate Plan. The Corporate Plan will be reviewed during 2016-17.

- 3.3 Underpinning the Purpose in the Corporate Plan are five themes:-

- Leadership: Providing leadership to make Rushmoor the place where our communities want to live and work
- Prosperity: Sustaining and developing our local economy
- Place: Protecting and developing a safe , clean and sustainable environment
- People and Communities: Supporting our people and communities and meeting local needs
- Good Value Services: Ensuring quality services that represent good value for money

Reviewing the authority's vision and its implications for the Authority's governance arrangements

- 3.4 The Cabinet reviews progress against the Corporate Plan on a quarterly basis by reviewing the targets that relate to what the Council has said that it will do in order to deliver the plans priorities. Details of these reviews are published and the 4th quarter review informs the measures and targets to be incorporated in the next year's plan. The Council's Cabinet meeting of the 31st May considered the 4th quarter and the end of year monitoring report.

- 3.5 The Directors' Management Board (DMB) and the Council's service heads also undertake regular more detailed monitoring and performance against targets in the Corporate Plan and which also can be scrutinised by member panels with specific remits. This acts as the key corporate performance monitoring process for the Council.
- 3.6 The Council has adopted a Code of Corporate Governance (CCG), which identifies, in one document, how the Council ensures that it runs itself in a lawful, structured, ethical and professional manner. The CCG is administered by the Head of Democratic and Customer Services and the Head of Paid Service (Chief Executive) in consultation with the Solicitor to the Council and is subject to an annual "light touch" review with any recommendations presented to the Licensing and General Purposes Committee (formerly the Standards and Audit Committee).

Measuring the quality of services for users, to ensure that they are delivered in accordance with the authority's objectives and for ensuring they represent the best use of resources

- 3.7 The Rushmoor Borough Council Corporate Plan - Strategic and Performance Updates Quarter 4 2015-16 and End of Year Section 3 Key Initiatives and Service Measures in the Good Value Services section sets out the monitoring measures and the customer satisfaction results on the web site service, Customer Service Unit call statistics and customer satisfaction surveys.
- 3.8 The Council's Procurement Strategy and associated Contract Standing Orders, which form part of the Council's constitution, govern how the Council buys the supplies, services and works that it needs. The Council is committed to achieving Best Value from its suppliers and ensuring that goods and services are procured in the most efficient and cost effective way.

Defining and documenting the roles and responsibilities of the executive, non-executive, scrutiny and officer functions, with clear delegation arrangements and protocols for effective communication in respect of the authority and partnership arrangements

- 3.9 The Council has a Constitution that sets out how it operates, how decisions are made (including Officers Delegated Powers contained in Part 3 of the Constitution) and the procedures followed to ensure that these are efficient, transparent and accountable to local people. Some of these procedures are statutory whilst other are discretionary in nature. The Constitution is divided into 16 Articles and sets out the detailed rules governing the Council's business. It is published on the internet at <http://www.rushmoor.gov.uk/article/3625/The-constitution>

Developing, communicating and embedding codes of conduct, defining the standard of behaviour for members and staff

- 3.10 The Council's Constitution contains a Code of Conduct for Councillors, which was reviewed in 2014 and contains the statutory code relating to disclosable pecuniary interests, requirements relating to the disclosure of non-pecuniary interests and sets out the expected behaviour and standards to be adhered to by councillors. In

addition, the Protocol for Member-Officer Relations, the Disciplinary Procedure, the Code of Conduct for Officers, the Whistle Blowing Policy and the Anti-Fraud and Corruption Policy set out the standards of service and conduct that are expected of employees.

Reviewing the effectiveness of the authority's decision making framework, including delegation arrangements, decision making in partnerships and robustness of data quality

- 3.11 The Council's Constitution details how the Council operates, including how decisions are made and the role of the Policy and Review Panels performing scrutiny and overview functions. It also includes the powers, duties and functions that are delegated to officers in Part 3 of the Constitution. The Head of Democratic and Customer Services, with advice from the Monitoring Officer, is conducting an ongoing review of the Council's constitutional arrangements in order to ensure that the arrangements are up to date and compliant with the Council's legal duties. The Licensing and General Purposes Committee will consider reports prior to submission to Council for adoption of any recommended changes.

Reviewing the effectiveness of the framework for identifying and managing risks and demonstrating clear accountability

- 3.12 The Standards and Audit Committee had responsibility for providing independent assurance on the adequacy of the risk management framework and the internal control and reporting environment including (but not limited to) the reliability of the financial reporting processes and the annual governance statement. This Committee has been merged with the Licensing and General Purposes Committee from May 2016, which will continue to discharge this role. In addition, the Licensing and General Purposes Committee needs to satisfy itself that appropriate action is being taken on risk and internal control related issues identified by the internal and external auditors and other review and inspection bodies.
- 3.13 The Council has in place a Risk Management Policy which is under review and which sets out the Council's overall approach to managing risk. The policy, which was formally approved by the Standards and Audit Committee (and in future the Licensing and General Purposes Committee), is to be subject to an annual review by a risk management group. This will be reported to the Licensing and General Purposes Committee, to ensure that it continues to reflect good practice and remains aligned with current business processes and practices and allows the Council to maintain the Corporate Risk Register.
- 3.14 The Council also has in place a Business Continuity and Disaster Recovery Plan, which is undergoing a refresh and will be retitled the Business Continuity Plan and considered by Licensing and General Purposes Committee in 2016.

Ensuring effective counter-fraud and anti-corruption arrangements are developed and maintained

- 3.15 The Council has in place an Anti-Fraud and Corruption Policy and which is published on the internet as part of the Council's Constitution reflecting the Council's approach and commitment to the prevention and detection of fraud and corruption.

Ensuring effective management of change and transformation System Thinking

- 3.16 The Council continues to develop and deliver improvements using System Thinking (ST) principles to improve the quality and efficiency of its services and the organisation through an intervention programme, shared learning, training and development activities. A Systems Thinking Learning Network has been developed embedding the learning across the organisation with services carrying out their own ST reviews, with a review having been carried out in Local Taxation this year and with a ST review of Sundry Debtors being planned for this year. System Thinking showcases have been given to both staff and members. Service reviews of Parking and Personnel Services have also been undertaken this year. Wider learning events have also been held with other local authorities who also use the method. This year, shared learning events have taken place with Portsmouth, Windsor & Maidenhead and Waverley Councils.
- 3.17 A Channel Shift and Mobile Working Project is in place aimed at improving customer interaction and identifying efficiency savings. Additionally, linked to the 8-Point Plan, a wider digital strategy is being developed in consultation with elected members and partner organisations.
- 3.18 A Co-location programme has been developed to create an appropriate and effective working environment, which secures significant financial benefit and prepares the Council to meet future changes in services. A second phase of this successful programme is currently being worked upon to identify short and longer-term opportunities. This project is now incorporated within Point 4 of the 8-Point Plan.
- 3.19 Shared Services - The Council has an existing programme of shared services and has, this year, established a shared Building Control service between Rushmoor and Hart DC to secure resilience of the service.
- 3.20 The 8-Point Plan - Further work has been undertaken to deliver and develop the Council's 8 Point Plan that is a strategy to ensure financial and service sustainability, by reducing net revenue spend over the medium to long term. The plan contains eight projects, which are as follows:-
- Point 1: The Work Book
 - Point 2: Efficiency and Transformation
 - Point 3: Income Generation and Investment Opportunities
 - Point 4: Better Use of Property and Assets
 - Point 5: Financial Strategy
 - Point 6: Organisational Structure
 - Point 7: Better Procurement, and

■ Point 8: Effective Taxation Policies

Each project within the plan has a programme manager and a senior management level programme board provides governance, oversight and the resources required by programme managers to enable the projects to move forward. The 8-Point Plan is “owned” by the Cabinet and all staff and councillors have been briefed upon the projects contained within the plan.

- 3.21 The Organisational Development Strategy, which is designed to support the service transformation and cultural change required for longer term financial sustainability, continues to be developed with Action Learning Sets, mentoring and coaching initiatives and Crucial Conversations Training for senior and middle managers having been completed. This strategy and related programme is designed to shape a flexible, motivated and effective workforce fit for the future and to support the community leadership role of councillors.
- 3.22 Organisational Structure (Point 6 of the 8 Point Plan) - this project is reviewing the functional and organisational arrangement of the Council, identifying a range of possible options for the design of the organisation into the future. A budget challenge process was introduced this year where Directors reviewed service budgets with Heads of Service to identify savings and new ways of working.
- 3.23 Options for future contract arrangements for refuse, recycling and ground maintenance - the Council is currently engaged in competitive dialogue procurement to deliver this service to a high standard and, subject to the tendered outcomes, at a reduced cost.
- 3.24 The Welfare Reform Task and Finish Group reviewed the Local Council Tax Support Scheme. Following public consultation, changes to the scheme were introduced. The group continue to review the impact of this and government welfare change on our most vulnerable residents. The government have now set up working groups to consider (i) system design (ii) needs and redistribution, and (iii) responsibilities.
- 3.25 The legislation to introduce 100% Business Rates retention will be the Local Growth and Jobs Bill, which will be introduced in early 2017. A consultation paper is expected to be issued later this year.

Ensuring the authority’s financial management arrangements conform with the governance requirements of the CIPFA “statement on the Role of the Chief Financial Officer in Local Government (2010)”

- 3.26 The Chief Financial Officer has responsibility for the proper administration of the Council’s financial affairs in accordance with Section 151 of the Local Government Act 1972. The Council has designated the Head of Financial Services as the Chief Financial Officer. While this arrangement does not conform precisely with the requirements of the CIPFA Statement, it does not impact on the effectiveness of the Chief Financial Officer in undertaking her role. The Head of Financial Services is a

member of the WLT and has unfettered access to Directors' Management Board, the Chief Executive and to Cabinet.

- 3.27 A significant review of the Council's senior management structure was undertaken in 2014/2015 with collaborate working by senior officers to establish an officer structure for the Council, which is fit for the challenges of the future. This review revised the role of DMB to enhance its strategic role and to devolve operational issues to Heads of Service. The DMB now consists of two Corporate Directors and the Chief Executive. Directors no longer have direct service responsibility but manage a number of strategic projects, which cut across a number of different service areas within the Council. During this year, DMB introduced Board appraisals for the Wider Leadership Team (WLT). The Council's WLT has been further reviewed and reduced to seven Heads of Service following the appointment of a Head of Service to the role of Director. The WLT, together with the members of the DMB, forms the Senior Leadership Team for the Council. The appointment of the new Director will lead to a review the responsibilities of some of the Heads of Service to include the services previously managed by that Director. Each Head of Service will be looking at the structure within their service area over the coming year.

Ensuring the authority's assurance arrangements conform with the governance requirement of the CIPFA "Statement on the Role of the Head of Internal Audit (2010)"

- 3.28 The Head of Internal Audit (HIA) occupies a critical position in the organisation, helping it to achieve its objectives by giving assurance on its internal control arrangements and playing a key role in promoting good corporate governance. The HIA reports directly to the Corporate Director who has strategic responsibility for this function and has unfettered access to the Chief Executive, Chief Financial Officer, DMB and to the Licensing and General Purposes Committee. The HIA works closely with the WLT in carrying out internal audit work, promoting good governance and more recently in providing project management expertise. The HIA also works closely with the independent, external auditor in order to use audit resources most effectively.

Ensuring the arrangements are in place for the discharge of the monitoring officer function

- 3.29 The Solicitor to the Council is designated as the Monitoring Officer with responsibility for ensuring compliance with established policies, procedures, laws and regulation, and reporting any actual or potential breach of the law or maladministration to the full Council and / or the Cabinet. The Legal Services Manager is the nominated Deputy Monitoring Officer.

Ensuring effective arrangement are in place for the discharge of the Head of Paid Service function

- 3.30 The Chief Executive is designated as the Head of Paid Service with responsibility for leading the DMB and the WLT and in driving forward the strategic agenda, set by Cabinet, improving the efficiency and performance of the council and ensuring that the community receives high quality, value for money services.

Undertaking the core function of an audit committee, as identified in CIPFA's Audit Committee – Practical Guidance for Local Authorities

- 3.31 The Council has a formally constituted Licensing and General Purposes Committee that undertakes the core functions of an audit committee and operates in accordance with CIPFA guidance. It provides independent assurance on the adequacy of the risk management framework and the internal control and reporting environment, including (but not limited to) the reliability of the financial reporting processes and the annual governance statement. The Council's Licensing & General Purposes Committee is also the body 'charged with governance'.

Whistle Blowing and receiving and investigating complaints from the public

- 3.32 The Council is committed to the highest possible standards of openness, probity and accountability and has in place a "Whistle Blowing Policy". This Policy was revised in 2014 and reflects the legal framework and obligation on the Council to enable staff to raise concerns that may involve unlawful conduct, illegality, financial malpractice or dangers to the public, employees or the environment.
- 3.33 Complaints from the public are dealt with in accordance with the Complaints Policy. This Policy is under revision to reflect the Ombudsman's guidance and will be coming forward for approval by Cabinet shortly and will then be published on the Council's website. There is a separate policy in place in respect of dealing with complaints made about members, which is on the Council's website.

Identifying the development needs of members and senior officer in relation to their strategic roles, supported by appropriate training

- 3.34 The Council has developed and keeps under review a Member Training and Development Plan, which is aimed at providing a long-term view to learning and development, whilst remaining sufficiently flexible to reflect changing priorities. The Council was awarded the South East Employers Charter for Member Development in 2013, following an assessment of the Council's training programme. The Cabinet has appointed a cross party Member Development Group to drive forward member development and support.
- 3.35 The Member Training and Development Plan currently include the following:-
- Induction Programme
 - Regulatory roles training, including licensing and development management
 - Ward Member mentoring Scheme
 - Skills training and workshops
 - Personal development planning is offered and available
 - Work shadowing front line services
 - Scrutiny training
 - Governance and Code of Conduct training
 - A range of electronic resources and training
- 3.36 This year, the Council's appraisal programme has been refreshed with appraisal processes designed to suit individual services.

- 3.37 The Council's Organisational Development Programme for staff is now moving into its fourth year and has been rolled out throughout the organisation to ensure that the Council is sustainable for the future. Action Learning Sets, Coaching Skills, System Thinking Learning Networks, Appraisal champion's group work on management development, reviews of some key policies and engagement with staff through the Chief Executive's briefing sessions are all features of this programme for 16/17.

Establishing clear channels of communication with all sections of the community and other stake holders, ensuring accountability and encouraging open consultation

- 3.38 The Council believes that all people should have the opportunity to voice their opinions on issues that affect them and to this end developed a Community and Business Engagement Strategy. During 2015/16, Members agreed a new focus for communications to increase digital communications alongside traditional methods such as Arena, the Council's magazine. The Council actively seeks the views of customers and staff through customer satisfaction surveys, community consultations, working with community groups, events and exhibitions, social media and through its web site. The Council has a walk in Customer Services Unit, where customers can seek advice and access services.
- 3.39 The Council promotes how people can have their say in a number of ways. It publicises individual consultations through traditional media (media, posters, flyers, exhibition boards, etc.), email, social media and its website. The Council's Statement of Community Involvement guides and Planning Policy consultations.
- 3.40 As part of the Council's work on organisational development, work has continued with elected Members to understand their community leadership and representational roles and how these can be developed in the future.
- 3.41 The Rushmoor Borough Council website has a section devoted to enabling people to 'have their say', including an on-going survey about the Council and the local area. The website also provides information about the Rushmoor Business Network, the Senior Citizens' Forum, the Council's Citizens' Panel and the Rushmoor Youth Forum.
- 3.42 The purpose of these various groups is to provide a systematic analysis of needs provision, opportunities and gaps in the Borough, based on accurate, relevant and up-to-date information that will inform collaborative work with partners and help deliver the priorities in the Rushmoor Corporate Plan. The Council also carries out an annual budget consultation exercise with its Senior Citizens' Forum, business ratepayers and the voluntary sector.

Enhancing the accountability for service delivery and effectiveness of other public service providers

- 3.43 The Council produces an annual Corporate Plan. This plan sets out its future priorities and planned activities and actions to deliver on the Council's stated purpose of "working with others to improve the quality of people's lives". The

Cabinet reviews progress against the Corporate Plan on a quarterly basis. The Directors' Management Board also regularly carries out monitoring and the Council's senior officers and member panels scrutinise performance on areas under their particular remit. This report acts as the key corporate performance monitoring process for the Council. The quarterly report contains details of performance and identifies where targets are not being met, or where slippage has occurred in delivering improvement measures.

- 3.44 A number of Council services are delivered in partnership with external service providers. A contract management team that provide a senior management interface between the Council and our partnership service provider manages these out sourced contracts. All such arrangements include a suite of key performance indicators and are based upon a culture of continuous improvement, recognising the need to achieve a balance between the Council's financial position and long term strategic aims

Incorporating good governance arrangements in respect of partnership and other joint working as identified by the Audit Commission report on the governance of partnerships, and reflecting these in the authority's overall governance arrangements

- 3.45 The terms of all joint working arrangements with other authorities are set out in Joint Service agreements, such as that of the North Hampshire Community Safety Partnership.

4. REVIEW OF EFFECTIVENESS

- 4.1 The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of the effectiveness is informed by the work of the Chief Executive and Directors within the Authority that has responsibility for the development and maintenance of the governance environment, the Head of Internal Audit's annual report, and by comments made by the external auditors and other review agencies and inspectorates.

- 4.2 The review process applied in respect of maintaining and reviewing the effectiveness of the system of internal control is informed by:-

- The views of Internal Audit reported to the Licensing and General Purposes Committee via the Internal Audit Progress Report, which includes executive summaries of new reports published where critical weaknesses or unacceptable levels of risk were identified
- The views of the external auditors, regularly reported to the Licensing and General Purposes Committee, including regular progress reports, the Annual Audit Letter and Annual Governance Report
- The Chief Internal Auditor Annual Report and Opinion on the adequacy and effectiveness of the Council's internal control environment
- The Internal Audit Strategy and delivery of the annual operational plan

- The work of the Corporate Directors and Chief Executive and Head of Democratic and Customer Services within the authority who have responsibility for the development and maintenance of the governance environment
- The independent views of regulatory inspection agencies such as the OSC and Government Connect audit
- The Risk Management Strategy, the Risk Management Manual and the Corporate Risks Register supported by the work of the Risk Management Group
- The work of the Licensing and General Purposes Committee to the discharge of its responsibility to lead on all aspects of corporate governance
- The Licensing and General Purposes Committee has advised us on the implications of the result of the review of the effectiveness of the governance framework and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework. The areas already addressed and those to be specifically addressed with new actions planned are outlined below.

	GOVERNANCE ISSUE	PLANNED ACTION	OFFICER RESPONSIBLE
1	The Council's Anti-Fraud and Corruption Policy, Whistle Blowing Policy and Anti-Money Laundering Policies have all been updated and require monitoring to ensure that they are effective	Appropriate arrangements are to be made to communicate the updated policies to staff and responsibility for monitoring compliance with these policies will be undertaken by the Risk Management Group	Auditor
2	Contract Standing Orders have been revised and a training programme has been rolled out throughout the Council to ensure compliance	Review to ensure that all contracting officers have attended training on the Contract Standing orders, procurement procedures and contracts register	Successor Head of Service to the Head of Strategy Engagement and Organisational Development
3	Revised Code of Conduct has been adopted covering interests other than DPI's	Make sure all new members are trained to the same standard as existing members	Monitoring Officer
4	Media guidelines for councillors	In view of the increased use of social media for communications and engagement, the Council will consider adopting social media guidance for staff and councillors. Current guidance and protocols will be updated during 2016/17.	Monitoring Officer and Head of Strategy Engagement and Organisational Development
5	Confidential Information	Review need for protocol	Monitoring Officer
6	Complaints procedure	Complaints procedure has been reviewed in accordance with new regulators' code	Head of Democratic and Customer Services

		and following approval, staff need to be informed of revised procedures and the procedure promoted on the Council's website	
7	Transparency Code	Complete the work required to comply with the Code of recommended Practice of Local Authorities on Data Transparency Dec 2014 in relation to land ownership	Monitoring Officer and Head of IT & Facilities
8	Equality Objectives	Work towards "developing standard" of the Public Sector Equalities Duty across the Council	Monitoring Officer
9	Fraud	Embed the new arrangement for investigating corporate fraud resulting from the transfer of the benefit investigation function to the DWP and monitor effectiveness	Head of Finance
10	Project management	The Council has been strengthening its management and governance of projects associated with the 8-Point Plan, and has agreed to develop and implement a programme of improvement for Capital Project Management and projects generally. In terms of capital projects, the Council has considered an internal audit report in October 2015 on how this could be improved and agreed some key points to be taken forward by the Asset Management Group.	Head of Strategy Engagement and Organisational Development in consultation with Audit
11	Peer Review	Respond to the findings of the Peer Challenge and agree and implement an action/ improvement plan. Key recommendations from the Peer Review have been incorporated into our	DMB

		performance management and project governance processes.	
12	Scheme of Delegation	Review of the officer Scheme of Delegation is underway	Head of Democratic and Customer Services
13	Risk Management	Review and update the Risk Management Policy and the Corporate Risks Register	Head of Financial Services
14	Amalgamation of Licensing & General Purposes and Standards & Audit Committees	Training on new roles and responsibilities	Head of Financial Services and Audit Manager
15	Review of Code of Governance	To reflect the Delivering Good Governance in Local Government: Framework (2016 Edition	Solicitor to the Council

4.4 We propose over the coming year to take steps to address the above matters to enhance further our governance arrangements. We are satisfied that these steps will address the needs for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review

Signed.....

Leader of the Council

Signed.....

Chief Executive

Dated.....