#### **APPENDIX A**

#### WARWICK DISTRICT COUNCIL

#### **ANNUAL GOVERNANCE STATEMENT 2010/11**

#### 1 SCOPE OF RESPONSIBILITY

Warwick District 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. Warwick District 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.

In discharging this overall responsibility, Warwick District Council is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions and arrangements for the management of risk.

Warwick District Council has approved and adopted a code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework, *Delivering Good Governance in Local Government*. A copy of the code is on our website at **www.warwickdc.gov.uk** or can be obtained from the Deputy Chief Executive (AJ). This statement explains how Warwick District Council has complied with the code and also meets the requirements of regulation 4[2] of the Accounts and Audit Regulations 2003 as amended by the Accounts and Audit (Amendment) [England] Regulations 2006 in relation to the publication of a statement on internal control.

#### 2 THE PURPOSE OF THE GOVERNANCE FRAMEWORK

The governance framework comprises the systems and processes, and culture and values, by which the Authority is directed and controlled and the activities through which it accounts to, engages with and leads the community. It enables the Authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.

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 Warwick District Council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.

The governance framework has been in place at Warwick District Council for the year ended 31<sup>st</sup>, March 2011 and up to the date of approval of the annual report and statement of accounts.

#### 3 THE GOVERNANCE FRAMEWORK

The key elements of the systems, processes and activities that comprise the Authority's governance arrangements are as follows:

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

In October 2010 the Council adopted Fit For the Future (FFF), its strategic response for dealing with the challenges of reduced income and rising customer expectations and demand. FFF provides an organisational framework to help the Council make progress towards its organisational purpose "To make Warwick District a great place to live, work and visit". It sets out a range of activities, interventions and projects falling into two broad areas:

- a) Activities which are designed to directly improve societal outcomes for our communities. Most of these are being developed jointly with the Council's partners and relate to one or more of the priority or cross cutting themes of the Sustainable Community Strategy.
- b) Activities which are designed to improve our organisation and the services provided by the Council. These activities aim to bring about the following improvements:
  - i) delivering a balanced budget; whilst
  - ii) improving the services we provide to customers; and
  - iii) helping develop our organisation and culture so that we are better able to continuously improve.

FFF was formulated following an extensive period of consideration and consultation which took account of:

- Warwick District Council's values;
- the political ambitions of the Council's ruling Administration;
- the Warwick district and Warwickshire Partnership Sustainable Community Strategies;
- a Systems Thinking approach to service design;
- an organisational design focusing on People and Place;
- the state of public finances;
- information on the quality of life in Warwick District;
- information from the most recent Citizens' Panel Survey;
- Strategy rationalisation;
- views of staff, the unions and various stakeholders and partners

A comprehensive governance framework is in place to manage the progress of FFF on an ongoing basis. Measures as opposed to targets are used to track the Council's progress.

The Council's Portfolio Holders each publish an annual statement indentifying and communicating the Council's priorities for the year. The statements are published on the Council's website.

Progress towards the Council's objectives is communicated to the local community through its publication, *District Focus* and via the website. Council efficiency details were included on the annual council tax bill for 2010/11 in accordance with central government requirements. This requirement has now been removed.

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

During 2008 and 2009 the Local Strategic Partnership (LSP) reviewed both its strategic approach to delivering improved outcomes for Warwick district residents and the enabling governance arrangements. The outcome of the review was Warwick district's Sustainable Community Strategy (SCS), endorsed by all LSP partners, along with streamlined governance arrangements overseen by the Warwick Partnership Executive Group (WPEG). The SCS has a vision of improving the quality of life for all the residents of Warwick district by making the district a great place to live, work and visit. Following Warwick District Council's adoption of the SCS a review of its own Corporate Strategy commenced. The culmination of the review was the production of FFF as described in 3.1 above.

The review has not impacted the Council's constitutional governance arrangements which can be summarised as follows:

- Council is the ultimate decision making body for those matters which have not been delegated to Executive, specific officers or are required to be taken at Council level by law;
- Executive will make decisions in respect of the majority of Council matters or make recommendations to the Council;
- Overview and Scrutiny Committee will have oversight responsibility for policy development and performance monitoring whilst Finance and Audit Scrutiny Committee will oversee the adequacy of the Council's risk management and control frameworks;
- Standards Committee will provide the final health check on the authority's governance arrangements. The Committee will also undertake regular reviews of the Constitution;
- key partnerships are reviewed on an ongoing basis by the Council's Scrutiny Committees.

The development of FFF has been based on Systems Thinking principles whereby service delivery is considered wholly from a customer perspective. Some progress has been made in engaging the Scrutiny Committees in a new approach to scrutiny, particularly in the area of Partnerships. It is

recognised that further work is required to ensure that focus on outcomes, rather than on process and meeting artificial targets, is achieved.

The new Coalition Government has abolished many forms of inspection. The previous Government had introduced an inspection framework in 2009, namely Comprehensive Area Assessment (CAA). As part of the inspection Warwick District Council had an organisational assessment based on its Use of Resources score and a separate score for Managing Performance. Warwick District Council scored a 2 for its Use of Resources and 2 for Managing Performance. Each score was out of 4 and the descriptor associated with a score of 2 is "meets minimum requirements".

The Council had an Action Plan for improving its Use of Resources score and this has helped the Council undertake a Value for Money Assessment. Further improvements will be addressed as part of the Fit For the Future Change Programme.

## 3.3 Measuring the quality of service for users, for ensuring they are delivered in accordance with the Authority's objectives and for ensuring that they represent the best use of resources

Performance monitoring and reporting mechanisms ensure performance management is embedded into the core management structures of the organisation. The Council has moved away from performance targets as it is considered that these act as a barrier to the ethos of continuous improvement. In their place the Council is using key performance measures to track service delivery progress. Key customer performance measures are identified in the Service Plans and Portfolio Holder Statements.

The Council regularly measures the experience of its services for users through the use of the citizens' panel of approximately 1,000 representative local citizens and in addition through service specific local surveys from time to time e.g. annual Housing Services survey, Customer Service surveys. For the year 2011/2012 the Council will be using a new approach which will enable a better understanding of customer priorities when the choices are complex and numerous. The approach will involve face-to-face interviews and on-line consultation.

The Council has previously utilised an online performance management system which required identified responsible officers to input data on at least a quarterly basis. This system was abandoned during 2010/11 as a new performance management regime and associated governance framework was developed. The Council is now in a position to roll-out the new approach during 2011/12.

The new performance management framework will focus on outcomes, based on what matters to people in our communities. The CAA process highlighted that whilst there are areas of very strong performance, there are also areas where performance is not progressing or the Council is unable to demonstrate what difference it is making. The new framework and governance arrangements should ensure that the organization focuses on

what is important to customers and responds more quickly to underperformance.

Where service falls below customer expectations it often manifests itself in complaints. The Complaints Policy has recently been reviewed and updated. Training sessions have been provided by the Local Government Ombudsman for relevant frontline and investigating officers and Standards Committee reviews complaints trends.

Benchmarking is seen as a key tool for properly understanding service delivery and cost. However, analysis must be done on a like-for-like basis taking account of the desires, needs and priorities of elected members and local communities. It is hoped that the Local Government Group's forthcoming data-hub will be a valuable tool to aid benchmarking.

## 3.4 Defining and documenting the roles and responsibilities of the executive, non-executive, scrutiny and other functions, with clear delegation arrangements and protocols for effective communication

The Constitution sets out the respective responsibilities of Members and Officers through Codes and Protocols. It sets out the terms of reference for the Council and all of the Council's Committees. The Executive reviews the Constitution on an ongoing basis and ensures the levels of delegation are appropriate. Amendments necessary to the scheme of delegation following a senior management restructure and other minor changes were identified during the year and included in the revision to the Constitution. A further review of the Constitution will need to be presented to Executive during early summer of 2011 following further senior management changes. The Standards Committee regularly reviews the Constitution.

There is a management matrix which shows the relationship between Portfolio Area and Service Area. This has been communicated to all service managers and is used as part of the induction programme for new staff.

## 3.5 Developing, communicating and embedding codes of conduct, defining the standards of behaviour for members and staff

The Constitution contains a Member and Officer Protocol and Codes of Conduct for Members and Officers. All new Members and Officers receive a copy of their respective Code(s). The Officer Code is currently under review and will be presented to the Council's Employment Committee in June for approval. There is a regular review of Member interests (detailed on the Council's website) by the Standards Committee and a six-monthly review by Senior Management Team (SMT) of officer interests and declarations of gifts and hospitality. Staff are reminded annually through their payslip of the need to make declarations for conflicts of interest. There is an Anti-Fraud and Corruption Policy which is reviewed each year by the Executive. All new staff receive training on the Policy as part of the induction process and it is brought to the attention of all staff annually through the Council's internal information Portal (known as WaSP).

The Authority agreed new Organisational Values in 2007 and these are now reflected in the Competency Framework which is a fundamental part of the staff appraisal and development process. The Organisational Values have been a key element in the development of FFF.

3.6 Reviewing and updating standing orders, standing financial instructions, a scheme of delegation and supporting procedure notes/manuals, which clearly define how decisions are taken and the processes and controls required managing risks

The Code of Financial Practice was updated and agreed by Council in April 2010. This followed a major review in 2008. The Code of Financial Practice will continue to be reviewed at least once every other year, with changes made as appropriate. The Code forms part of the Constitution.

The Code of Procurement Practice (formerly Code of Contract Practice) is part of the Council's Constitution. Amendments to the Code were agreed by Council in April 2010. This follows reviews in 2008 and 2009. The Code of Procurement Practice will be reviewed at least once every other year, with changes made as appropriate. The Code will be included in on-going procurement training for senior officers and those involved in procuring goods and services. A Procurement Strategy has been agreed by the Council and an annual Procurement Action Plan is monitored by Finance & Audit Scrutiny Committee. The Plan is overseen by the Procurement Manager who champions procurement issues across the Council. Senior Managers have received specialist procurement training and are responsible for following good procurement practice.

Finance & Audit Scrutiny Committee has taken a keen interest in procurement forming a Procurement Working Party of three members which has helped raise the profile of the function throughout the organisation.

It has been recognised that ongoing work needs to be undertaken in relation to Procurement and contract management in general. In March 2010 Executive agreed extra officer resource to help enable the authority to realise further savings: Monitoring of the savings is part of the Council's budget/financial monitoring process. With regard to contract management, comprehensive training was due to be provided for all budget managers but due to other demands had to be delayed. This will be addressed in financial year 2011/2012.

There is a uniform report template which sets out the standard information required for a Committee decision to be taken, and a protocol is in place for officer attendance at Committees. There are guidance notes for officers on writing reports. The template and associated guidance have been updated to reflect FFF and will be in place for early 2011/2012.

Committee Services has identified the need to set up a system to monitor the implementation of decisions. Appropriate software has been installed allowing this to happen but other work demands have left the initiative outstanding. The Corporate Management Team (CMT) has identified the need to better record the comments of officers involved in the development of

reports. It is probable that officers will be using software which enables more effective collaborative working on reports from autumn 2011.

The Council approved a Risk Management Policy Statement and Strategy in January 2003 and this is updated annually and reported to Finance & Audit Scrutiny Committee. This explains the methodology which provides a comprehensive framework for the management of risk throughout the Council. A cross-departmental Risk Management Group has been refreshed and its Terms of Reference revised to develop a comprehensive performance framework for risk management and to help embed risk management across the Authority. Service Area risk registers are in place and appropriate staff have been trained in the identification, assessment and monitoring of risks. From April 2010 there is a rolling review of Service Area risks and high level corporate risks are reported to the Executive every quarter. The Corporate and Strategic Risk Register has been updated to reflect FFF. In addition, the FFF programme has its own risk register.

The Use of Resources (UoR) assessment for managing risk scored the authority at "2" (meets minimum requirements). Further actions for improvement are being addressed as part of the Fit for the Future Change Programme.

### 3.7 Undertaking the core functions of an audit committee, as identified in CIPFA's Audit Committees – *Practice for Local Authorities*

The core functions of an audit committee are delivered by the Authority's Finance & Audit Scrutiny Committee. These are set out in its terms of reference approved by the Executive.

The main purposes of the Finance & Audit Scrutiny Committee is to provide independent assurance of the adequacy of the risk management framework and the associated control environment; independent scrutiny of the Authority's financial and non-financial performance to the extent that if affects the Authority's exposure to risk and weakens the control environment; and to oversee the financial reporting process.

In addition to the main purposes of the Finance & Audit Scrutiny Committee it also:

- Approves (but not directs) Internal Audit's strategy, plan and performance;
- reviews summary Internal Audit reports and the main issues arising and seeks assurance that action has been taken where necessary;
- considers the reports of external audit and inspection agencies;
- considers the effectiveness of the Authority's risk management arrangements, the control environment and associated anti-fraud and anti-corruption arrangements;
- seeks assurances that action is being taken on risk related issues identified by auditors and inspectors;
- satisfies itself that the Authority's assurance statements, including the Annual Governance Statement, properly reflect the risk environment and any actions required to improve it;

- ensures that there are effective relationships between external and internal audit, inspection agencies and other relevant bodies, and that the value of the audit process is actively promoted;
- reviews the financial statements, external auditor's opinion and Reports to members and monitors management action in response to the issues raised by external audit.

## 3.8 Ensuring compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful

Compliance with law and regulation is achieved by recruiting suitably qualified staff and having job descriptions and personal specifications for all posts. All senior managers receive a local government briefing to alert them to changes in the external regulatory framework and major changes are identified for reports to the Executive or Council as appropriate. As part of the service planning process the impact of new laws is addressed.

SMT will monitor compliance with internal policies from time to time; examples are the annual review of appraisals undertaken; compliance with health and safety policy; Equality and Diversity annual report. Internal Audit will identify any key policies that might need to be tested as part of any audit.

To ensure expenditure is lawful the Council agrees detailed budgets. Managers responsible for the budgets are required to sign acceptance of them. The Code of Financial Practice and Code of Procurement Practice set out procedures to ensure lawful expenditure. Both finance staff and the Chief Financial Officer are required to sign off Committee reports to ensure relevant financial issues have been addressed. Where appropriate, reports are considered by the Council's shared Legal Service. All Executive reports are considered by the Council's Monitoring Officer.

Establishing a shared Legal Service with the County Council has meant that arrangements have been put in place whereby there is a responsibility for the relevant Head of Service to satisfy themselves as to the legality of any recommendation and if there is any doubt seek advice.

The Council publishes a Forward Plan on a monthly basis which contains details of all decisions to be made by the Executive.

## 3.9 Whistle-blowing and arrangements for receiving and investigating complaints from the public

An Anti Fraud and Corruption Strategy and a Whistle-blowing Policy and Procedure are in place. Both documents are reviewed annually by Finance & Audit Committee and publicised widely, including on the Council's website.

The Anti Fraud and Corruption strategy comprises a series of measures and procedures that are designed to frustrate any attempted fraudulent or corrupt acts. This includes:

Establishing the appropriate culture;

- appointing statutory officers;
- maintaining a Council committee structure which reviews decisions, examines specific issues and promotes high standards, as well as investigating alleged breaches of the code of conduct;
- recruiting and retaining high calibre staff;
- establishing relevant procedures and codes that form the Council's overall control framework;
- exchanging information with other bodies;
- undertaking a comprehensive approach to the preparation of the Annual Governance Statement.

The strategy also describes the arrangements for investigating allegations of wrongdoing.

The Whistle-blowing policy provides a channel for those that have serious concerns about any aspect of the Council's work to come forward and express those concerns.

#### The policy aims to:

- encourage employees to feel confident in raising serious concerns and to question and act upon concerns about practice,
- provide avenues for employees to raise those concerns and receive feedback on any action taken,
- ensure that employees receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied and
- reassure employees that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure in good faith.

The policy gives examples of the possible concerns that may exist, how these should be raised and how the Council will respond. In the event of dissatisfaction, other avenues for raising concerns are also set out within the policy.

The Council has a Complaints Policy which describes how members of the public can make a complaint. All officers dealing with complaints have been appropriately trained. If a complainant is dissatisfied with the outcome of the initial investigation they can request that the complaint be investigated again. This will be by an officer outside of the service to which the complaint relates. If the complainant is still dissatisfied they have the right to have the complaint referred to the Local Government Ombudsman for investigation and resolution.

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

There is a Members' Development Programme agreed by the Members' Development Group. The Group considers the Programme to be of high quality and a submission has previously been made to the West Midlands Local Government Association for the Members' Development Charter

Primary Award. Members undertake a self-assessment of development needs and significant support is provided by officers.

Training for senior officers is identified through the induction programme and on an ongoing basis through the competency and personal development framework process which requires a review of development needs.

Members of the Corporate Management Team are encouraged to attend appropriate SOLACE training whilst all senior mangers are encouraged to attend relevant professional seminars and conferences. The Senior Management Team has received on-going professional coaching throughout the year to aid service transformation.

## 3.11 Establishing clear channels of communication with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation

The Council issues a residents' magazine distributed cost-effectively with the Observer free newspaper or separately delivered in rural areas that do not receive the Observer. The Council's annual performance is reported in one of these issues.

The LSP and its sub groups enable a two-way dialogue across the whole spectrum of the Council's activities that involve key local stakeholders in partnership working e.g. County Council, Primary Care Trust (PCT) and Voluntary Sector (VS). As described at 3.2, the LSP has been reviewed and revised.

Neighbourhood Working, which has extended the remit of the local neighbourhood policing forums to cover the totality of local government working (District, County and Parish/Town) along with PCT and VS, is now active in all parts of the District. Forum attendees identify community priorities and allocate resources provided by the District and County Councils to specific projects.

The Council has identified the need to improve its dialogue with hard to reach groups in order to ensure its services are responsive to the whole community. A Community Engagement Strategy has been agreed by Executive and the revised Committee Report template is more explicit in ensuring that officers identify what consultation has occurred when proposals are brought forward.

The results of the Place Survey are analysed according to geographical communities and communities of interest.

The Council has had two citizens' panels during the year in order to gain views from a representative sample of constituents.

A Communication and Marketing Strategy has been drafted although this will need re-visiting during 2011/12 to take account of organisational and cultural developments.

# 3.12 Incorporating good governance arrangements in respect of partnerships and other group working as identified by the Audit Commission's report on the governance of partnerships, and reflecting these in the Authority's overall governance arrangements.

The Council has updated its policy for managing its partnership arrangements. The governance arrangements for all partnerships have been reviewed with all lead officers being required to complete a Partnership Checklist to identify any governance weaknesses. All new partnerships must be approved by Executive with a partnership checklist accompanying the report presented to the Executive.

The Scrutiny Committees have reviewed the effectiveness of a number of partnerships and it is hoped that this work can be built on during 2011/2012.

#### 4 REVIEW OF EFFECTIVENESS

Warwick District 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 effectiveness is informed by:

- the work of senior managers within the Authority who have responsibility for the development and maintenance of the governance environment;
- the Audit & Risk Manager's annual report; and
- comments made by the external auditors and other review agencies and inspectorates.

The process that has been applied in maintaining and reviewing the effectiveness of the governance framework is as follows:

#### 4.1 The Council

The Council is responsible for agreeing the changes to the Constitution that have been developed during the year. This Annual Governance Statement is also reported to the Council when it approves the financial statements.

#### 4.2 The Executive

The Executive agreed a new Code of Corporate Governance in March 2008. The Code of Corporate Governance is endorsed by Standards Committee each year.

## 4.3 The Finance & Audit Scrutiny Committee and the Overview and Scrutiny Committee

The Council has delegated to Finance & Audit Scrutiny Committee responsibility for discharging the functions of an audit committee. Its main purposes are to provide independent assurance of the adequacy of the risk management framework and the associated control environment; independent scrutiny of the authority's financial and non-financial performance; and oversee the financial reporting process.

Each quarter the committee reviews the findings from Internal Audit assignments completed during those periods, whilst annually it receives a report on the effectiveness of Internal Audit. It also considers reports from external audit and other review agencies as and when they are issued.

#### 4.4 The Standards Committee

The Code of Corporate Governance and the requirement to produce an Annual Governance Statement has led to responsibility for Corporate Governance, and the review of the Annual Governance Statement, being explicitly recognised in the terms of reference of the Standards Committee.

#### 4.5 Internal Audit

Internal Audit is responsible for monitoring the quality and effectiveness of systems of internal control. A risk model is used to formulate a three-year plan which is approved by Finance & Audit Scrutiny Committee and from which the audit assignments are identified.

A report of each audit is submitted to the relevant Service Area Manager. The report includes an action plan comprising recommendations for improvements in control and management responses.

Quarterly reports are issued to Members on progress in achieving the annual plan. The reports also contain copies of all action plans issued to managers in the quarter, details of any outstanding responses and, where the level of assurance given is less than substantial, summaries of the audits

Internal Audit is fully-compliant with all eleven elements of the CIPFA Code of Practice for Internal Audit in Local Government in the UK.

The Internal Audit Section is subject to regular inspection by the Council's external auditors who place reliance on the work carried out by the section.

#### 4.6 Other review/assurance mechanisms

The Scrutiny Committees, the Standards Committee and External Audit contribute to the review of the authority's compliance with policies, procedures, laws and regulations. Occasional use has been made of other review agencies such as peer assessors from the West Midlands Local Government Association. It is anticipated that self-regulation will develop through 2011/12.

The Council has actively used the EFQM Excellence Model as a tool for improving practice against an internationally recognised model and as a tool for benchmarking against cross-sector organisations. The Council has consistently increased its EFQM scores over four assessments. In 2008 the Council was the West Midlands Award Winner (competing against organisations from all sectors) in the Midlands Excellence EFQM Awards. The Council has also been Investors In People accredited since the late 1990s. A number of services are externally accredited against specific standards, for

instance Building Control, and Food Safety are both accredited under ISO9000.

We have been advised on the implications of the result of the review of the effectiveness of the governance framework by the Finance and Audit Scrutiny Committee and a plan to address weaknesses and ensure continuous improvement of the system is in place.

#### 5 SIGNIFICANT GOVERNANCE ISSUES

Governance issues that are identified for improvement are highlighted in the bullets below. The actions have been identified from work done on the statement above, in collecting the evidence required and through completion of the Service Assurance Statements:

- 1. Ensure that budgets are managed robustly so the Council is able to deliver the services its customers value but with a much reduced income. **ACTION** Ongoing support from accountants; training on Code of Financial Practice and Code of Procurement Practice.
- 2. Ensure that procurement practice addresses compliance and innovation issues with a focus on planning for the tender process. **ACTION**Organisation-wide awareness sessions on best practice approach to procurement; training on Code of Financial Practice and Code of Procurement Practice.
- 3. Ensure that the new performance management framework is embedded and understood throughout the organisation. **ACTION** Ongoing support to service areas from line managers to focus on the importance of measures and how to learn from them to improve service.
- 4. Ensure that the Council's decision-making processes enable full officer and Member scrutiny. **ACTION** Reports to be circulated in a timely fashion allowing contribution from all appropriate officers and Members receive reports with necessary time for consideration.
- 5. Ensure that the Council has a joined-up approach to communication and marketing. **ACTION** Review the draft Communication and Marketing Strategy.
- 6. Ensure that the Council's individual partnerships are reviewed on an annual basis. **ACTION** Completion of the annual health check for each of the Council's partnerships.

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 need 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:		
Michael Doody Leader of the Council	Chris Elliott Chief Executive	
Dated:		