

APPENDIX 1

UPDATE ON ACTION PLAN IN RESPONSE TO THE SECOND REPORT IN THE PUBLIC INTEREST

1. The Council has fully accepted all recommendations made by the external auditor (R1-R12)
2. There are 7 statutory recommendations from the external auditor for the Council to urgently address:

R1 – Cabinet papers for major projects
R2 – Contract execution & storage
R3 – Updating legal advice
R4 – Payments to third parties

R7 – Record keeping arrangements
R9 – Roles and responsibilities
R11 – Financial reporting on significant capital projects

Green – Completed

Amber – Progressing

Recommendation 1

The Chief Executive supported by the Monitoring Officer and the Section 151 Officer should ensure that Cabinet papers for major projects set out clearly:

R1.1 the legal powers to enter into a particular arrangement and attendant risk

R1.2 how the Council can protect its interests and secure economy, efficiency and effectiveness

Response / Improvement Work to Date

Generally, the Council has taken action to improve the processes surrounding the submission and contents of reports to Cabinet. There is improved forward planning. Authors of reports must ensure comments are received from statutory officers and legal powers and risks are

sufficient addressed. There is early consideration of all cabinet papers at the Corporate Management Team (CMT) and Mayor Advisory Board (MAB). The Chief Executive, Section 151 and Monitoring Officer are in attendance and do ensure the issue raised in R1 are always addressed. The process allows for much earlier consideration of papers and more opportunity for assurance of, and challenge to, advice being presented to the Cabinet.

Currently, as part of the budget monitoring process, the spend on Capital Projects are reported monthly and reviewed at Capital Board, CMT and then Cabinet.

For 2023/24, as part of the budget setting process, a list of major capital schemes will be put forward for approval. It will include the relevant legal powers, best value considerations and the proposed funding envelop.

Action Plan

1.1 A new report writers guide will be produced alongside a new report template for all Council reports to use regardless of which board or committee in will be presented in. This will explain the issues raised in the RIPI and why commentary is needed on the lawfulness of the council's arrangements

**Deadline
September 2022**

**Accountability
Monitoring
Officer**

Comments

A new officer report template and guidance that addresses the issue raised in R1 has been produced and will be rolled out in September/October 22. A copy is attached.

1.2 The template for reports will be amended to include a reference in the legal comments section to the need to ensure legal advice is recorded in the paper on the power to enter into a particular arrangement for a major project and the actions required to ensure it remains lawful

**Monitoring
Officer**

Comments

This is contained in the current and new report guidance. Also, reports are reviewed by the Monitoring Officers and his Deputies to ensure legal powers for and lawfulness of decisions.

1.3 The Capital Board will be asked to produce guidance on what constitutes a major project and this will be incorporated into the new report writers' guide. This section in the report will also draw out the need for officers and those delivering on the Council's behalf to ensure the council delivers value for money within all its major projects and secures economy, efficiency and effectiveness for the taxpayers and residents of Croydon in accordance with Section 3(1) of the Local Government Act 1999 and the duty of best value. The template will stress the importance of ensuring the report provides decision makers with full information and the requirement to update the decision-making body when this information changes.

December 2022

**Director of
Commercial
Investment**

Comments

Guidance on establishing and managing capital schemes, including what constitutes a capital scheme, will be included in the work to prepare for the 2023/24 Capital Programme. This will form part of the Capital Strategy. The proposed 2023/24 Capital Programme will be reported as part of the 2023/24 Council Tax Setting process.

1.4 Progress reports on the delivery of major projects to Cabinet will also incorporate an assurance section that the requirements are to ensure the arrangements are lawful and have been met e.g. contracts signed, land correctly transferred etc prior to committing the Council contractually. These reports will also be available to the Scrutiny and Overview Committee in order to enable them to fully scrutinise the delivery of major projects based on the same full suite of information that is available to the Cabinet Members. These requirements will also be included in the new guide.

December 2022

**Monitoring
Officer**

**Director of
Commercial
Investment**

Comments

In August 2022, Capital Board set up a working group to develop a specific Capital Strategy. The Strategy that will provide further assurance on the delivery of capital projects lawfully and ensuring properly executed agreement before discharge of obligations.

The Council's Constitution contains the procurement safeguards referred to above including legality and executed contract before commencement of obligations.

Expenditure on capital schemes is included in the monthly Financial Performance Report to Cabinet.

The Capital Board is developing a more detailed quarterly Capital Projects Performance Report. The first report will be presented to Cabinet and Scrutiny by 31 December 2022 reflecting progress on all capital schemes to the end of the September 2022. The report will be produced quarterly thereafter.

1.5 Once the new guide and the new report template has been produced, it will be brought to the Audit and Governance Committee for member consultation and agreement. Training will then be developed to ensure understanding of the new requirements by report writers.

December 2022

Monitoring Officer

Comments

The new report template and guidance will be taken to Audit and Governance Committee in September 2022.

Director of Commercial Investment

1.6 The Council will make full use of its decision management software (Mod.Gov) to automate production of reports. This will have the benefit of allowing report authors to draw in expert advice earlier in the process and prevent reports from being changed after they have received legal and financial commentary.

To be determined

Monitoring Officer

Comments

The plan now is to use Share Point in Microsoft Teams. This will be rolled out as part of the new report writing template and guidance

Recommendation 2

The Monitoring Officer should ensure that:

R2.1 contracts are properly executed before entering into arrangements with third parties

R2.2 the properly executed documents are stored robustly to allow future scrutiny

R2.3 key requirements underpinning the legal advice are in place before progressing with the arrangement

Response

Action Plan

2.1 The Monitoring Officer will undertake a review of existing council processes for the signing of contracts, storage of signed contracts, and assurance on underpinning legal requirements prior to arrangements being entered into. The Council will also take further action to enhance and ensure compliance with these processes.

**Deadline
September 2022**

**Accountability
Monitoring
Officer**

**Director of
Commercial
Investment**

Comments

The Monitoring Officer is working with the Head of Strategic Procurement and Contracts on R2. The process is in place for the signing of contracts in accordance with the Constitution Tenders and Contracts Regulations and which also accords with R2. Legal Services has in place a process for signing and storing contracts on matters they are dealing with. Strategic Procurement are looking at a central repository of all Council contracts. This forms part of the Strategic Procurement and Contract Plan.

2.2 The Capital Board will be given a formal role going forward in the assurance of the contracts having been signed, that they are stored securely and all legal requirements have been met prior to approval to proceed with a major project.

Comments

It is recommended that the action plan be amended to read:-

‘The Capital Board will be given a formal role going forward in monitoring that contracts have been signed, that they are stored securely and that all legal requirements were met prior to the project proceeding.’

This will be undertaken through the proposed Quarterly Capital Projects Performance Report. The terms of reference of the Capital Board will be updated to reflect this.

This will now be part of Capital Board and Procurement Board standard agenda items for monitoring purposes.

2.3 This review will be reported to the Statutory Officers’ Board in the first instance and will include any recommendations on required changes to processes, thresholds and delegations. This review will then be brought to the Audit and Governance Committee for Member oversight and comment.

Comments

The review arising from this recommendation will be reported to the Statutory Officers’ Board and the Audit and Governance Committee once it has been concluded.

Recommendation 3

The Monitoring Officer should ensure that where legal advice changes after a Cabinet decision that the consideration of the implications of the changes is documented and where the Monitoring Officer considers additional legal risks are identified that the Cabinet is updated on the impact on the original decision made.

Response

Action Plan

**Deadline
May 2022**

**Accountability
Monitoring
Officer**

3.1 The Monitoring Officer will review the Council's Constitution, particularly Part 5A, the Protocol on Decision Making. This review will have particular regard to setting out proportionate thresholds for decisions to be reported back to the relevant decision-making body when advice (legal or otherwise) upon which the decision was based significantly changes. The review will also consider introducing a time limitation on the delegated decisions that are made by Cabinet in order to ensure they remain relevant and are used appropriately. This will also be included in the new Report Writers Guide.

Comments

Completed – a revised Part 5A was approved by Council in March 2022. This included addition of text to require Corporate Directors to keep the implementation of decisions under review and ensure that circumstances relevant to the decision continue to apply. Where there has been a material change of circumstances, a further report must be made to the decision-making body prior to implementation.

3.2 A standing item will be included on the Statutory Officers' meeting to identify if there have been any significant changes to advice underpinning Cabinet decisions.

Immediate

Chief Executive

Comments

This will usually be discussed at Corporate Management Team which includes the Head of Paid Service, Chief Finance Officer, and Monitoring Officer. Cabinet will be updated on material

changes in the circumstances given rise to decisions made and such that will require a review of the decision.

Recommendation 4

The Section 151 Officer should ensure that prior to making payments to third parties that appropriate legal documentation is in place such as a properly executed contract or a properly executed loan agreement

Response

Action

4.1 The Section 151 officer will undertake a review of the Council's existing processes for ensuring payments to third parties meet the required governance controls such as a signed and dated loan agreement or contract. This review will make any recommendations that are necessary to ensure that there are proportionate thresholds, checks and balances on payments to third parties. The Council will also take further action to enhance and ensure compliance with these processes.

**Deadline
July 2022**

**Accountability
Corporate
Director of
Resources**

Comments

The Section 151 officer confirmed that this task has been completed. A further assurance will be sought by commissioning an internal audit of these processes.

In relation to procured contracts, the requirements of the Tenders and Contracts Regulations (Regulation 29)¹ in the Constitution covers the process for assurances prior to proceeding with arrangements with contractors. A reminder note will be sent to staff.

¹ 29. Contract Pre-conditions and Preliminaries

29.1 A Director must not authorise or permit a contractor to enter on any land or buildings belonging to the Council or to proceed with the Contract or start work on site until a written order to proceed with the Contract has been issued and the following actions are completed:

- a.** the contractor has provided proof of insurance;
- b.** the contractor has completed and returned to the Council the contract documents unless the Director can satisfy the Director of Legal Services and the Chair of CCB that the Council's position is otherwise adequately secured;

4.2 The Capital Board will incorporate this assurance check as part of their formal programme board oversight on the progress of major projects and will amend their terms of reference to reflect this additional role.

Comments

As mentioned above, this will form part of Capital Board and Procurement Board standard agenda item.

4.3 The findings of this review will be reported to the Statutory Officers' meeting in the first instance, with any changes that are required to the Council's Constitution being reported to the Council via the Audit and Governance Committee or Ethics Committee.

Comments

An update report will be provided to the Statutory Officers' next meeting in October 2022.

Recommendation 5

The Monitoring Officer and Section 151 Officer should ensure that arrangements are in place to properly consider public procurement rules and UK obligations on subsidy control rules before entering into arrangements

c. where appropriate the performance bond is duly completed;

d. all procedures have been completed to the satisfaction of the Director of Legal Services.

29.2 Once the actions in Regulation 29.1 are completed then a purchase order must be raised on the Council's financial system, prior to any goods or services being provided. Raising purchase orders, and any permitted exceptions, must be conducted in accordance with the Council's P2P Guidance documentation.

Response

Action

Deadline

Accountability

5.1 The Council's Director of Commercial Investment will review the Council's existing arrangements for ensuring compliance with subsidy control legislation. This review will be reported to the Section 151 Officer and Monitoring Officer and will highlight any risks in the Council's current arrangements. The review will also make recommendations and set out an action plan to mitigate and address any risks that are identified. The Capital Board may play a part in the assurance mechanism before entering into arrangements. If so, its terms of reference will be amended.

September 2022

Director of
Commercial
Investment

Comments

There are representatives from Finance, Legal and Procurement at Procurement Board and Capital who ensure that there is compliance with statutory provisions and the Constitution's Tender and Contract Regulations. There is regular and ongoing review of arrangements for both Procurement Board and Capital Board to ensure compliance with statutory and constitutional provisions. There is a log kept of any non-compliances with a view to escalation to CMT and to ensure any systemic failings are rectified.

For all contract, procurement, and subsidy related matters requiring Cabinet decision, legal advice/comments are sought to ensure compliance with procurement and subsidy control rules. Also, for compliance with the Council's Tender and Contracts Regulations where relevant. These reference the need to check for public subsidy issues. Risks of public subsidy will vary from project to project and each project will have to be reviewed on its own merits.

Recommendation 6

The Chief Executive, Monitoring Officer and Section 151 Officer need to consider how to respond appropriately to challenge on decisions and be prepared to take corrective action where necessary.

Response

Improvement Work to Date

As part of the Croydon Renewal and Improvement Plan, a range of actions have been undertaken to improve the culture of the organisation in relation to openness, transparency, accountability and challenge. The various actions are all designed to facilitate constructive challenge and open dialogue from Members, residents, officers and each other. To date, this work has included:

- Introducing a 'guardians' programme for staff, providing a safe space for staff across the organisation to raise concerns
- New customer complaints handling process
- Developing a new access to information protocol for Councillors
- Introducing new codes of conduct for Members, Co-opted Members and Officers

There is regular dialogue between the Chief Executive, Section 151 Officer and Monitoring Officer to consider various challenging governance issues and decide on the appropriate response and if required, an action plan.

Action

6.1 A new member enquiry / casework process and supporting software will be rolled out to allow more pro-active tracking, management and responses to member casework enquiries and also allow learning from the casework to be captured more effectively to improve services. This may result in policy decisions needing to be revisited.

Deadline

July 2022

Accountability

Assistant Chief Executive

Comments

This has been completed.

6.2 A new system of internal control officer boards have been implemented following a review of core business meetings and forums (Capital, Health & Safety, Equality Diversity & Inclusion, Finance & Assurance, Performance, Digital, Resident Voice and Corporate Resilience). To be implemented are boards on Information Management and Workforce).

July 2022

Director of Policy, Programmes & Performance

Comments

This has been completed

**6.3 A new Member / Officer working protocol will be developed and submitted to Council for adoption into the Council's Constitution.
*Please note that this action will also support 9.2***

March 2022

Monitoring Officer

Comments

This has been completed and was approved by Full Council in March 2022

6.4 A new assurance framework will be developed and reported on annually to the Audit and Governance Committee

July 2022

Corporate Director of Resources

Comments

The Council's governance framework has been reviewed and informed by the NAO's Three Lines of Defence model.

Recommendation 7

The Chief Executive should improve record keeping arrangements so that:

R7.1 the records supporting key decisions including financial analysis are maintained

R7.2 a standard approach to record keeping with monitoring of which decisions have been implemented
R7.2 tolerances are established for reporting back changes to Cabinet

Response

Action

Deadline
October 2022

Accountability
Assistant Chief Executive

7.1 A review will be undertaken by the Council’s Information Management Team of record keeping across the Council for key decisions, delegated decisions and Cabinet decisions in general and record keeping of formal internal control boards. The review will make any necessary recommendations regarding proposed future systems of control, in particular to ensure required or agreed future reporting requirements are adhered to through the forward plan and these will be reported to the Audit and Governance Committee and Cabinet.

7.2 This review to provide assurance that the Council is operating in accordance with the relevant legislation including the good practice recommendations in the Information Commissioner’s Office “S46 Code of Practice – Records Management” issued under section 46 of the Freedom of Information Act 2000.

December 2022

Assistant Chief Executive

Comments

This task is to be allocated to the Monitoring Officer who is responsible for Democratic Services and who in turn is responsible for record keeping of Executive decisions.

Recommendation 8
The Chief Executive, as Head of Paid Service, should ensure appropriate governance arrangements are implemented in a timely manner particularly for strategic developments such as Brick by Brick including where appropriate that there is clear guidance for nominated representatives on the expectations of the role including reporting back to the Council.

Response

Improvement Work to Date

Actions already taken by the Council to strengthen the governance arrangements for strategic and major projects and programmes include:

- Appointment of a new Commercial Investment Director;
- Establishment of a Croydon Companies Supervision and Monitoring Panel (officer only) to have oversight of all Council owned companies
- Establishment of a Brick by Brick Shareholder Cabinet Advisory Board (Member only);
- Established a new programme office that includes a remit to work on the capital programme
- Agreement of new terms of reference for the Capital Board with a focus on good planning, governance and delivery
- Where warranted, non-executive and / or independent chairing and leadership has been sought, including independent chairs for the Council's General Purposes and Audit Committee, Housing Improvement Board, Children's Improvement Board and the Croydon Adult Safeguarding Board.
- External training on statutory officers responsibilities has been completed separately for members and officers with additional training for non-statutory officers on company law and shareholder function.

Action Plan

| | Deadline | Accountability |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------------------|
| 8.1 The Croydon Companies Supervision and Monitoring Panel be tasked with considering what additional measures, if necessary, need to be introduced to support and clarify the roles and responsibilities of any person appointed by the Council to be a director of a Council owned company. This review to incorporate an undertaking to abide by the code of conduct and standards of public life (commonly known as the Nolan principles). <i>Please note that this action will also support 9.4</i> | May 2022 | Director of Commercial Investment |
| 8.2 The Council has had guidance notes agreed on the role of a non-executive appointee on behalf of the Council but these will now be reviewed and brought back to Ethics Committee for approval. | September 2022 | Monitoring Officer |

Comments

The guidance notes have been drafted and are ready to go to the Ethics Committee.

8.3 Mandatory training will be provided on a regular and timely basis to all Council owned company directors. Attendance at this training is part of the requirements to remain a Council appointed Director.

October 2022

**Monitoring
Officer**

Comments

Initial training has taken place but there is further training planned.

8.4 The terms of reference for the Council's new internal control boards will be reviewed to ensure that there is clarity on how the work undertaken by these boards flows into member meetings and formal member briefings as appropriate.

**To be
determined**

**Director of
Policy,
Programmes &
Performance**

Comments

The Internal Control Boards have recently been established and a review of their effectiveness is planned.

Recommendation 9

- 1. The Chief Executive should work with the Executive Mayor to continue to embed**
- 2. R9.1 a clearly understood distinction between the different roles and responsibilities of Members, officers and representatives akin to Brick by Brick**
- 3. R9.2 clear responsibilities for officers and Portfolio Holders in challenging reports presented to Cabinet and other committees for balance, accuracy and consistency with their knowledge**

Improvement Work to Date

The Council has agreed a new code of conduct and guidance for Members and a new code of conduct for officers. This is being supplemented by tailored learning and development activity as part of the May 2022 Member Induction Programme, in new officer induction programmes and the corporate culture change programme.

Action

9.1 Review role descriptions for members and a revised member handbook is being developed. This work will be brought to the Ethics Committee for approval.

**Deadline
May 2022**

**Accountability
Monitoring
Officer**

Comments

This task is completed. A revised member handbook developed including role descriptions. All members were given access to the handbook following the elections.

9.2 A new Member / Officer working protocol will be developed and submitted to Council for adoption into the Council's Constitution. This protocol will clarify responsibility for providing effective advice and challenge.

May 2002

**Monitoring
Officer**

Please note that this action will also support 6.3

Comments

This task is completed. Member/Officer protocol approved by Full Council in March 2022.

9.3 The Croydon Companies Supervision and Monitoring Panel be tasked with considering what additional measures, if necessary, need to be introduced to support and clarify the roles and responsibilities of any person appointed by the Council to be a director of a Council owned company.

May 2022

**Director of
Commercial
Investment**

9.4 The Croydon Companies Supervision and Monitoring Panel be tasked with considering what additional measures, if necessary, need to be introduced to support and clarify the roles and responsibilities of any person appointed by the Council to be a director of a Council owned company. This review to incorporate an undertaking to abide by the code of conduct and standards of public life (commonly known as the Nolan principles).

May 2022

**Director of
Commercial
Investment**

Please note that this action will also support 8.1

Comments

Completed

Recommendation 10

The Chief Executive should review the terms of reference for officer and member/officer boards that oversee significant projects and capital/revenue expenditure and clarify the escalation routes for significant additional expenditure in excess of the budget

Response

Improvement Work to Date

The Council has introduced new system of internal control officer boards following a review of core business meetings and forums. The Boards are Capital, Health & Safety, Equality Diversity & Inclusion, Finance & Assurance, Performance, Digital, Resident Voice and Corporate Resilience. To be implemented are Boards on Information Management and Workforce. The Capital Board and Finance and Assurance Board oversees significant projects and capital/revenue expenditure and has in place escalation and reporting route to Corporate Management Team (CMT).

Since June 2021 the Cabinet has been receiving a monthly update on the council's general fund, housing revenue account and capital expenditure. Currently, as part of the budget monitoring process, the spend on Capital Projects are reported monthly and reviewed at Capital Board, CMT and then Cabinet.

Action

10.1 The Capital Board will review its terms of reference to develop an effective role in regard to its oversight of the delivery of major projects and clarify the escalation routes for significant overspends. Future project governance should be reflective of the scale

**Deadline
May 2022**

**Accountability
Director of
Commercial
Investment**

of each project, with an appropriate level of monitoring, reporting and resource allocated.

Comments

Capital Board regularly reviews the funding envelop for projects and reports any discrepancies to CMT and if required Cabinet.

Capital Board is also developing a more detailed quarterly Capital Projects Performance Report. The first report will be presented to Cabinet and Scrutiny by 31 December 2022 reflecting progress on all capital schemes to the end of the September 2022. The report will be produced quarterly thereafter.

10.2 The format of the monthly cabinet update on general fund, HRA and capital expenditure will be reviewed in general to ensure it is incorporating the best practice of high performing councils in budget reporting to members. This review will also pay specific regard to the reporting on risks and opportunities, over and underspends on the delivery of significant projects either revenue or capital expenditure and either general fund, parking places reserve account or housing revenue account related.

May 2022 P1 Report

Corporate Director of Resources

Comments

The S.151 officer confirms that this task is completed. There is regular budget monitoring report to Cabinet that deals with 10.2 above.

10.3 The Internal Control Board terms of reference template will be reviewed for all boards to ensure clarity on responsibilities for risks in regard to its responsibilities, workload and escalation routes.

July 2022

Director of Policy, Programmes & Performance

Comments

An initial Terms of Reference template has been used to establish the new Internal Control Boards. Once the boards have been in operation for a few months, a review will be undertaken of their effectiveness and a final Terms of Reference template will be agreed.

10.4 The current monthly budget assurance meetings chaired by the Chief Executive and Corporate Director of Resources will be reviewed to assess effectiveness after its first year of operation.

Feb 2023

Director of Policy, Programmes & Performance

Comments

The monthly budget assurance meetings are continuing and their effectiveness continues to grow.

The planned review will be undertaken later this financial year.

Recommendation 11

The Section 151 Officer should ensure financial reporting on significant capital projects is enhanced so that

R11.1 a clear agreed budget for the project is identified and the underlying financial analysis is maintained

R11.2 a clear agreed project expenditure amount can be reported through appropriate governance processes

R11.3 where there are changes in the original financial assumptions that there is an assessment on the project's financial viability with appropriate reporting

R11.4 the revenue impact of any changes in the capital project are addressed in future budget setting

Response

Action Plan

Deadline

Accountability

11.1 The Corporate Director of Resources will oversee the review work to be undertaken by the Director of Commercial Investment in regard to improving the role of the Capital Board in meeting a number of these recommendations. That review will incorporate the recommendations above.

May / June 2022

**Corporate Director
of Resources**

Comments

The Section 151 Officer attends Capital Board meetings at which these issues are addressed.

The Capital Board is developing a detailed quarterly Capital Projects Performance Report. The first report will be presented to Cabinet and Scrutiny by 31 December 2022 reflecting progress on all capital schemes to the end of the September 2022. The report will be produced quarterly thereafter. This addresses the issues raised by R11.1, R11.2, R11.3 and R11.4.

The Council tax Setting process for 2023/24 is being project managed to encompass constant review across the revenue, capital and treasury arrangements. This will also address R11.4.

11.2 The review of the monthly budget report format will also take into account these recommendations and report to the Audit and Governance Committee, the Scrutiny and Overview Committee and finally Cabinet taking into account members' views.

December 2022

**Corporate Director
of Resources**

Capital projects will continue to be monitored through the monthly Finance Performance Report. In addition, the Capital Board is developing a separate detailed quarterly Capital Projects Performance Report. The first report will be presented to Cabinet and Scrutiny by 31 December 2022 reflecting progress on all capital schemes to the end of the September 2022. The report will be produced quarterly thereafter. This addresses the issues raised by R11.1 and R11.2.

Recommendation 12

The Chief Executive should put in place arrangements to consider inherent conflicts of interest for executive officers

Response

Action

12.1 A new code of conduct for all officers is currently in development which will incorporate best practice in regard to the declaration of interests and arrangements for managing any conflicts.

**Deadline
May 2022**

**Accountability
Monitoring Officer**

Comments

This task has been completed and approved by Full Council in March 2022

12.2 An annual review of declarations for all officers will be undertaken each May. This will update a formal register of all declarations to be published on the council website.

May annually

**Head of Internal
Audit**

Comments

This is planned for the end of the financial year.

12.3 CMT, DMTs and all internal governance boards will have declarations of interest added as a standing item to their agendas.

May 2022

**Director of Policy,
Programmes &
Performance**

Comments

This has been actioned and completed

12.4 The Statutory Officers' Board will amend its terms of reference to include the formal review of any officer conflicts of interest and the agreement of arrangements for managing them.

May 2022

Chief Executive

Comments

There is a standard agenda item for declaration of interest at the Statutory Officer's Board meeting. Officers are aware of the need to withdraw from parts of the meeting where there is likely to be a conflict of interest.