

GATESHEAD COUNCIL - LOCAL CODE OF GOVERNANCE

SELF ASSESSMENT

Principle A: Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law		
Sub principle: Behaving with integrity	We demonstrate this by:	Action required:
<ul style="list-style-type: none"> • Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation. 	<ul style="list-style-type: none"> • Code of conduct for members of the Council (consistent with Nolan’s Seven Principles of Public Life); identifying other Registerable Personal Interests 	<ul style="list-style-type: none"> • Code is updated as and when required.
<ul style="list-style-type: none"> • Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles). 	<ul style="list-style-type: none"> • Code of conduct for employees (paragraph 2 of Part 2 of the handbook of national conditions of service for local authority employees states “Employees will maintain conduct of the highest standard such that public confidence in their integrity is sustained.”) 	<ul style="list-style-type: none"> • Annual review of the protocols
<ul style="list-style-type: none"> • Leading by example and using these standard operating principles or values as a framework for decision making and other actions. 	<ul style="list-style-type: none"> • Declarations of interests at meetings • Council Protocols eg Councillor/Officer relations, Development Control – protocol on Good Practice, Regulatory and Licensing Committees – protocols on Good Practice 	<ul style="list-style-type: none"> • Annual review of the Constitution and Governance Statement
<ul style="list-style-type: none"> • Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively. 	<ul style="list-style-type: none"> • Member Induction programme • Corporate induction for employees • Annual Governance Statement • Gift and Hospitality register • Audit and Standards Committee remit • Strengthened independent scrutiny and challenge of governance and standards by the Audit and Standards Committee’s independent members • Appraisal and Development sessions • Whistleblowing Policy - Arrangements for the Public 	

	<ul style="list-style-type: none"> Whistleblowing Policy for employees Contract Procedure Rules 	
Sub principle: Demonstrating strong commitment to ethical values		
<ul style="list-style-type: none"> Seeking to establish, monitor and maintain the organisation's ethical standards and performance. 	<ul style="list-style-type: none"> Council's strategic approach of Making Gateshead a Place Where Everyone Thrives is based on tackling inequality across the borough Code of conduct for officers and members Council Protocol 1 – Council's Corporate Values Employee competency framework Member Officer protocol Workforce Strategy & Workforce Plan Equal Opportunities Policy Councillor Development Framework includes appropriate training Strategic Commissioning framework Corporate Social Responsibility Pledge Audit and Standards Committee remit Strengthened independent scrutiny and challenge of governance and standards by the Audit and Standards Committee's independent members 	<ul style="list-style-type: none"> Annual review of councillor training needs following changes in their roles and remit Review of Equal Opportunities Policy
<ul style="list-style-type: none"> Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation. 		
<ul style="list-style-type: none"> Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values. 		
<ul style="list-style-type: none"> Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with high ethical standards expected by the organisation. 		
Sub principle: Respecting the rule of law		
<ul style="list-style-type: none"> Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations. 	<ul style="list-style-type: none"> Monitoring officer provisions/statutory roles Financial regulations Contracts procedure rules Statement of accounts Council reports including implications from financial and legal officers Audit and Standards Committee – members assurance statements 	<ul style="list-style-type: none"> Risk management policy to be reviewed
<ul style="list-style-type: none"> Creating the conditions to ensure that the statutory officers, other key post holders and members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements. 		
<ul style="list-style-type: none"> Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders. 		
<ul style="list-style-type: none"> Dealing with breaches of legal and regulatory provisions effectively. 		

<ul style="list-style-type: none"> • Ensuring corruption and misuse of power are dealt with effectively. 	<ul style="list-style-type: none"> • Council’s decision making processes eg Planning and Development Committee • Constitution • Partnership arrangements • Gateshead Trading Company • Risk management policy • Whistleblowing policy • ICT security policy • Complaints procedure • Counter Fraud and Bribery policy 	
Principle B: Ensuring openness and comprehensive stakeholder engagement		
Sub principle: Openness	We demonstrate this by:	Action required:
<ul style="list-style-type: none"> • Ensuring an open culture through demonstrating, documenting and communicating the organisation’s commitment to openness. 	<ul style="list-style-type: none"> • Transparency agenda eg FOIs, council expenditure over £500, senior officer salaries • Constitution (references meetings open to the public) • Council papers, agendas and minutes (including Calendar of Meetings) • Access to information rules • Customer feedback and complaints • Equality impact assessments • Consultation principles • Viewpoint Panel • Consultation portal • Partnership meetings • Trade Union Consultation Framework • Employee forums • Annual report • Use of social media and email eg Gateshead Now • Corporate Social Responsibility Pledge 	
<ul style="list-style-type: none"> • Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided. 		
<ul style="list-style-type: none"> • Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear. 		
<ul style="list-style-type: none"> • Use formal and informal consultation and engagement to determine the most appropriate and effective interventions/courses of action. 		

Sub principle: Engaging comprehensively with institutional stakeholders		
<ul style="list-style-type: none"> Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably. 	<ul style="list-style-type: none"> Partnership arrangements/ agreements/memorandum of understanding Partnership protocol Partnership guidance for officers Partnership Risk Register 	<ul style="list-style-type: none"> Partnerships audited on annual basis Review of Corporate Communications Strategy
<ul style="list-style-type: none"> Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively. 		
<ul style="list-style-type: none"> Ensuring that partnerships are based on: <ul style="list-style-type: none"> trust a shared commitment to change a culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit. 		
Sub principle: Engaging stakeholders effectively, including individual citizens and service users		
<ul style="list-style-type: none"> Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes. 	<ul style="list-style-type: none"> Consultation principles Viewpoint panel Service user involvement forums Consultation portal Communications Strategy Social media Members briefing Council News Numerous public surveys held throughout the year Gateshead Now email Have your Say inbox Web feedback Reflect full range of comments in council reports Youth Assembly Corporate Parenting role Social Care Commissioning Intentions Joint Strategic Needs Assessment 	
<ul style="list-style-type: none"> Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement. 		
<ul style="list-style-type: none"> Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs. 		
<ul style="list-style-type: none"> Implementing effective feedback mechanisms in order to demonstrate how their views have been taken into account. 		
<ul style="list-style-type: none"> Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity. 		
<ul style="list-style-type: none"> Taking account of the interests of future generations of tax payers and service users. 		

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits		
Sub principle: Defining outcomes	We demonstrate this by:	Action required:
<ul style="list-style-type: none"> • Having a clear vision which is an agreed formal statement of the organisation’s purpose and intended outcomes containing appropriate performance indicators, which provides the basis for the organisation’s overall strategy, planning and other decisions. 	<ul style="list-style-type: none"> • Corporate policy, planning framework • Vision 2030 • Making Gateshead a Place Where Everyone Thrives strategic approach • Service Business Plans • Medium Term Financial Strategy 2018-23 • Corporate performance management framework - 6 monthly performance reports • Impact assessments • Strategic and Operational Risk Registers • Budget consultation • Corporate Social Responsibility Pledge 	<ul style="list-style-type: none"> • MTFS updated at least annually • Service Business Plans reviewed annually • Operational risk registers are reviewed at least yearly
<ul style="list-style-type: none"> • Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer. 		
<ul style="list-style-type: none"> • Delivering defined outcomes on a sustainable basis within the resources that will be available. 		
<ul style="list-style-type: none"> • Identifying and managing risks to the achievement of outcomes. 		
<ul style="list-style-type: none"> • Managing service user expectations effectively with regard to determining priorities and making the best use of the resources available. 		
Sub principle: Sustainable economic, social and environmental benefits		
<ul style="list-style-type: none"> • Considering and balancing the combined economic, social and environmental impact of policies, plans and decisions when taking decisions about service provision. 	<ul style="list-style-type: none"> • Council reports include relevant implications • Medium Term Financial Strategy 2018-23 • Capital Programme • Consultation Principles • Records of decision making • Equal opportunities policy • Strategic Risk Register • Corporate Social Responsibility Pledge • The Council’s Thrive Agenda • The Health and Wellbeing Board’s remit as set out in the Council’s Constitution 	<ul style="list-style-type: none"> • MTFS updated at least annually • Development of an Investment Strategy • Annual review of Strategic Risk Register • Annual Review of the Council’s Constitution
<ul style="list-style-type: none"> • Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation’s intended outcomes and short-term factors such as the political cycle or financial constraints. 		
<ul style="list-style-type: none"> • Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs. 		
<ul style="list-style-type: none"> • Ensuring fair access to services. 		

Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes												
Sub principle: Determining interventions	We demonstrate this by:	Action required:										
<ul style="list-style-type: none"> • Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and including the risks associated with those options. Therefore ensuring best value is achieved however services are provided. 	<ul style="list-style-type: none"> • Medium Term Financial Strategy 2018-23 • Decision making protocols • Outcomes from consultations • Council reports including summary of consultation, alternative options, and implications 	<ul style="list-style-type: none"> • MTFS updated at least annually 										
<ul style="list-style-type: none"> • Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts. 			Sub principle: Planning interventions			<ul style="list-style-type: none"> • Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets. 	<ul style="list-style-type: none"> • Policy planning framework • Project management • Risk management policy • Corporate performance management framework • Project management • Commissioning Strategy - monitoring mechanisms in place • Medium Term Financial Strategy 2018-23 • Budget guidance • Budget consultation • Budget Report • Capital Programme 		<ul style="list-style-type: none"> • Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered. 	<ul style="list-style-type: none"> • Considering and monitoring risks facing each partner when working collaboratively including shared risks. 	<ul style="list-style-type: none"> • Ensuring arrangements are flexible and agile so that the mechanisms for delivering outputs can be adapted to changing circumstances. 	<ul style="list-style-type: none"> • Establishing appropriate key performance indicators as part of the planning process in order to identify how the performance of services and projects is to be measured.
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<ul style="list-style-type: none"> • Ensuring capacity exists to generate the information required to review service quality regularly. 												
<ul style="list-style-type: none"> • Preparing budgets in accordance with organisational objectives, strategies and the medium term financial plan. 												

<ul style="list-style-type: none"> Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy. 		
Sub principle: Optimising achievement of intended outcomes		
<ul style="list-style-type: none"> Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints. 	<ul style="list-style-type: none"> Budget consultation framework Budget Guidance Medium Term Financial Strategy 2018-23 Corporate Commissioning strategy Service Business Planning 	<ul style="list-style-type: none"> Budget guidance issued annually to Leadership Team MTFS updated at least annually
<ul style="list-style-type: none"> Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term. 		
<ul style="list-style-type: none"> Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage. 		
<ul style="list-style-type: none"> Ensuring the achievement of 'social value' through service planning and commissioning. 		
Principle E: Developing the Council's capacity, including the capability of its leadership and the individuals within it		
Sub principle: Developing the entity's capacity	We demonstrate this by:	Action required:
<ul style="list-style-type: none"> Reviewing operations, performance use of assets on a regular basis to ensure their continuing effectiveness. 	<ul style="list-style-type: none"> Roles and responsibilities of the Executive and senior officers Job descriptions for councillor roles Councillor Development framework Annual Pay policy statement Partnership arrangements Workforce Strategy and Workforce Plan 	
<ul style="list-style-type: none"> Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how the authority's resources are allocated so that outcomes are achieved effectively and efficiently. 		
<ul style="list-style-type: none"> Recognising the benefits of partnerships and collaborative working where added value can be achieved. 		
<ul style="list-style-type: none"> Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources. 		
Sub principle: Developing the capability of the entity's leadership and other individuals		
<ul style="list-style-type: none"> Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in 	<ul style="list-style-type: none"> Councillor officer protocol 	

<p>the relationship and that a shared understanding of roles and objectives is maintained.</p>	<ul style="list-style-type: none"> • Relevant job profiles • Constitution – delegated decisions • Induction Programme • Member personal development plans (Councillor support and development group) • Workforce Strategy • Workforce Plan • Learning from Ofsted and CQC Inspections • Scrutiny framework • Staff development plans linked to Appraisal and Development • Health and Safety policy • Wellbeing at work initiatives eg health advocates and mental health first aiders • Viewpoint Residents Panel • Resident’s Survey • Constitution (reference meetings open to public) 	
<ul style="list-style-type: none"> • Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body. 		
<ul style="list-style-type: none"> • Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads the authority in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and balance for each other’s authority. 		
<ul style="list-style-type: none"> • Developing the capabilities of members and senior management to achieve effective shared leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by: <ul style="list-style-type: none"> – ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged – ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis – ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external. 		
<ul style="list-style-type: none"> • Ensuring that there are structures in place to encourage public participation. 		
<ul style="list-style-type: none"> • Taking steps to consider the leadership’s own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections. 		
<ul style="list-style-type: none"> • Holding staff to account through regular performance reviews which take account of training or development needs. 		

<ul style="list-style-type: none"> Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing. 		
Principle F: Managing risks and performance through robust internal control and strong public financial management		
Sub principle: Managing Risk	We demonstrate this by:	Action required:
<ul style="list-style-type: none"> Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making. 	<ul style="list-style-type: none"> Service Operational risk register Strategic Risk Register Corporate Risk and Resilience Group Audit and Standards Committee remit Business Continuity Plans Service Business Plans Corporate Risk Management Policy 	<ul style="list-style-type: none"> Centralisation of risk documents and tools (via the intranet) to enable easier access for councillors and employees
<ul style="list-style-type: none"> Implementing robust and integrated risk management arrangements and ensuring that they are working effectively. 		
<ul style="list-style-type: none"> Ensuring that responsibilities for managing individual risks are clearly allocated. 		
Sub principle: Managing Performance		
<ul style="list-style-type: none"> Monitoring service delivery effectively including planning, specification, execution and independent post implementation review. 	<ul style="list-style-type: none"> Council's Forward Plan/Schedule of Decisions Corporate performance management framework Member development eg scrutiny training Quarterly monitoring updates regarding revenue and capital spend Publication of agendas and minutes of meetings 	<ul style="list-style-type: none"> Annual training update relating to Risk for members of the Audit and Standards Committee
<ul style="list-style-type: none"> Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation's financial, social and environmental position and outlook. 		
<ul style="list-style-type: none"> Ensuring an effective scrutiny or oversight function is in place which encourages constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the organisation's performance and that of any organisation for which it is responsible. 		
<ul style="list-style-type: none"> Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement. 		
<ul style="list-style-type: none"> Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting (eg financial statements). 		

Sub principle: Robust internal control		
<ul style="list-style-type: none"> Aligning the risk management strategy and policies on internal control with achieving the objectives. 	<ul style="list-style-type: none"> Corporate Risk Management Policy Internal Audit programme Corporate Risk and Resilience Group Strategic and Operational Risk Registers Audit and Standards Committee – oversight of management processes Counter Fraud and Bribery Policy Anti-money laundering policy Local Code of Governance Internal Audit Charter and Strategy Annual governance statement Audit and Standards Committee, minutes and agendas Overview and Scrutiny Committees 	<ul style="list-style-type: none"> Risk management policy to be reviewed Development of a policy relating to the prevention of the facilitation of tax evasion (Criminal Finances Act 2017)
<ul style="list-style-type: none"> Evaluating and monitoring the authority’s risk management and internal control on a regular basis. 		
<ul style="list-style-type: none"> Ensuring effective counter fraud and anti-corruption arrangements are in place. 		
<ul style="list-style-type: none"> Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor. 		
<ul style="list-style-type: none"> Ensuring an audit committee or equivalent group or function which is independent of the executive and accountable to the governing body: <ul style="list-style-type: none"> Provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment That its recommendations are listened to and acted upon. 		
Sub principle: Managing data		
<ul style="list-style-type: none"> Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including process to safeguard personal data. 	<ul style="list-style-type: none"> Constitution – Data Protection Statement Data Protection policy Information Security Strategy Provide performance information to scrutiny and senior officer group Data sharing agreements in place regarding Troubled Families programme and health data Internal audit of data quality on strategic outcome indicators Annual information Technology Health Check as part of the Council’s Public Services Network compliance submission 	<ul style="list-style-type: none"> Annual data quality audit undertaken of the strategic outcome indicators
<ul style="list-style-type: none"> Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies. 		
<ul style="list-style-type: none"> Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring. 		

Sub principle: Strong public financial management		
<ul style="list-style-type: none"> Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance. 	<ul style="list-style-type: none"> Constitution - Financial regulations, Delegations, Budget and Policy Framework rules and Contracts Procedure rules Budget monitoring reports Strategic Risk Register Assurance Statements Internal and External Audit 	
<ul style="list-style-type: none"> Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls. 		
Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability		
Sub principle: Implementing good practice in transparency	We demonstrate this by:	Action required:
<ul style="list-style-type: none"> Writing and communicating reports for the public and other stakeholders in an understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate. Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand. 	<ul style="list-style-type: none"> Council’s website Council Protocol 3 – Report Formats and Preparing Reports Adopting Plain English standards Comply with the local government transparency code and publish all required information in a timely manner Access to information rules Publication of reports on the open part of committee agenda subject to the Access to information rules 	<ul style="list-style-type: none"> Council Protocols are reviewed on an annual basis
Sub principle: Implementing good practices in reporting		
<ul style="list-style-type: none"> Reporting at least annually on performance, value for money and the stewardship of its resources. 	<ul style="list-style-type: none"> Corporate performance management framework Roles and responsibilities outlined in Constitution Audit and Standards Committee Cabinet agendas Medium Term Financial Strategy 2018-2023 	<ul style="list-style-type: none"> Annual review of the Constitution MTFS updated at least annually
<ul style="list-style-type: none"> Ensuring members and senior management own the results. 		
<ul style="list-style-type: none"> Ensuring robust arrangements for assessing the extent to which the principles contained in the Framework have been applied and publishing the results on this assessment including an action plan for improvement and evidence to demonstrate good governance (annual governance statement). 		

<ul style="list-style-type: none"> • Ensuring that the Framework is applied to jointly managed or shared service organisations as appropriate. 	<ul style="list-style-type: none"> • Annual Governance Statement • Council’s Annual Report 	
<ul style="list-style-type: none"> • Ensuring the performance information that accompanies the financial statement is prepared on a consistent and timely basis and the statements allow for comparison with other similar organisations. 		
<p>Sub principle: Assurance and effective accountability</p>		
<ul style="list-style-type: none"> • Ensuring that recommendations for corrective action made by external audit are acted upon. 	<ul style="list-style-type: none"> • Managed through the Audit and Standards Committee - review of the effectiveness of internal audit 	<ul style="list-style-type: none"> • Partnership arrangements and risk register is reviewed annually by Internal Audit
<ul style="list-style-type: none"> • Ensuring an effective internal audit service with direct access to members is in place which provides assurance with regard to governance arrangements and recommendations are acted upon. 	<ul style="list-style-type: none"> • Findings from internal audit programme of inspections are reported to Audit and Standards Committee. 	
<ul style="list-style-type: none"> • Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations. 	<ul style="list-style-type: none"> • Ofsted and CQC inspections reported through political framework 	
<ul style="list-style-type: none"> • Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement. 	<ul style="list-style-type: none"> • Annual governance statement • Partnership arrangements and risk register 	
<ul style="list-style-type: none"> • Ensuring that when working in partnership, arrangements for accountability are clear and that the need for wider public accountability has been recognised and met. 	<ul style="list-style-type: none"> • Annual Audit Letter issued by external auditor 	