

**DRAFT ANNUAL GOVERNANCE STATEMENT
2021/22**

Scope of responsibility

The New Forest National Park Authority is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for and used economically, efficiently and effectively.

The Authority 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, the Authority is also responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of the Authority's functions which includes arrangements for the management of risk.

In March 2022 the Authority approved and adopted an updated Local Code of Corporate Governance, which is consistent with the principles of the CIPFA/Solace Framework Delivering Good Governance in Local Government. A review of compliance with the Code is carried out on an annual basis by the Chief Executive, Monitoring Officer and Chief Finance Officer. A copy of the Code is published on the Authority's website and can be obtained from Corporate Services.

This statement explains how the Authority has complied with the Code and also meets the requirements of the Accounts and Audit Regulations 2015 in relation to the publication of a statement of corporate governance.

The purpose of the governance framework

The updated governance framework comprises the systems and processes, and culture and values, by which the Authority is directed and controlled and its 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 on-going process designed to identify and prioritise the risk to the achievement of the Authority's aims, objectives and policies, 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

The Local Code of Corporate Governance describes the Authority's governance framework in relation to the seven core principles below and demonstrates how it complies with these:

1. behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law
2. ensuring openness and comprehensive stakeholder engagement
3. defining outcomes in terms of sustainable economic, social and environmental benefits
4. determining the interventions necessary to optimise the achievement of the intended outcomes
5. developing the Authority's capacity, including the capability of its leadership and individuals within it
6. managing risks and performance through robust internal controls and strong public finance management
7. implementing good practice in transparency, reporting and audit to deliver effective accountability.

Our code was first adopted by the Authority in June 2012 and was most recently updated and approved by Members in March 2022.

Through carrying out its general statutory duties and responsibilities in connection with the two national park purposes, the Authority also seeks to work for and with the local communities to foster the social and economic wellbeing of communities within the National Park.

Focusing on outcomes for the community and implementing a vision for the local area

The Authority's purposes, vision and intended outcomes for residents, visitors and other stakeholders are identified in a range of policy documents. The overarching vision for the management of the Forest was set out in the Partnership Plan 2015–2021 and has recently been revised into the subsequent 2022-2027 Plan published in March 2022. These Plans are developed and approved following extensive community and stakeholder engagement. The Plans are for the geographic area of the National Park, not for one particular body or organisation within it, and so have a wide range of important stakeholders who put down in writing what they will be doing for the Forest during this time, increasing governance and accountability for all. A Partnership Plan monitoring group will be established soon to monitor, review and assess the stated actions and outcomes from the Plan over the next five years.

The Authority's own Business Plan and annual Work Programmes take their cues from the Partnership Plan, incorporating those actions for which the Authority has direct responsibility. The Authority adopted a Business Plan covering the period 2018-2021 at its Authority meeting on 22 March 2018 following extensive consultation of Members and Staff. This consultation was invaluable in identifying the priorities and objectives to be included in the Plan over the three-year term and responding proactively to future challenges and opportunities affecting the New Forest National Park. Shortly the Authority will develop a new multi-year Business Plan to provide a framework for those elements of the new Partnership Plan directly deliverable by the Authority.

The 2021/22 Work Programme, which sits under the Business Plan, presents an account and assessment of the Authority's activities, alongside the separate reports of its financial position and performance, and are aligned to the Authority's purposes and duty of 'Protect, Enjoy, Prosper' whilst under the headings of:

- Climate and Nature Emergency
- Connection with Nature and the National Park
- Sustainable Communities in a Working Forest
- Positive Land Use Change
- Achieving Excellence

Progress is monitored regularly by the Executive Board and the Resources, Audit and Performance Committee. Pending the adoption of the Partnership Plan and Business Plan, the key actions within the 2021/22 Work Programme were refreshed for use in 2022/23. In 2021/22, the Authority received a single-year grant settlement at the same financial level as 2020/21 - £3.25m (the grant was latterly extended to cover a further year in 2022/23, again at the same level of funding). The Authority is focusing resources towards developing medium-term strategic plans for key areas of work and to identify how the Authority and its partnerships can work together to achieve even more for the Forest – these themes provide important direction in the annual work programmes.

Recognising that people are our biggest asset, in 2019 we introduced a 'People Plan' to help focus our development as an organisation. This looks at how we work and sets out actions to further improve our working practices and develop/sustain a high-performing team. We are continuing to work with staff and members in rolling out the actions in the People Plan and will review all its work to date in 2022/23.

Management information is produced to assist with the measurement of performance including a number of performance indicators. Budgetary control reports are reviewed monthly by the budget holders and on a regular basis by the Executive Board and Resources, Audit and Performance Committee. The Committee also considers the Authority's medium-term financial position. The Medium-Term Financial Plan aligns resources to their priorities. Where performance slips this is further examined, and action taken where possible.

The Authority continues to be very highly successful in attracting external funding into the area, leveraging around £17 for every £1 of funding we put towards partnership projects. The Authority is also keenly investigating corporate partnerships (sponsorship) through the wider National Park family and the National Parks Partnerships Ltd formed in 2015 by the UK's 15 National Parks. Its remit is to create successful corporate partnerships that generate vital income to make a significant, sustainable and discernible contribution to the improved quality of UK National Parks and the benefits they offer for generations to come. In 2017, the Partnership secured its largest corporate partnership on behalf of the 15 UK National Parks which has led to a significant sponsorship deal being negotiated with Columbia Sportswear to provide all corporate clothing requirements.

The Chief Executive reports to the Authority on the development and performance of the Authority overall. A full Annual Review document, detailing the Authority's activities and achievements over each year is published each Summer.

The Authority has adopted and maintains a complaints process to enable complaints about the Authority's activities to be considered and responded to. Information on how to use the complaints process is available on the Authority's website. Information on complaints received is considered by the Authority's officers and lessons for service improvement are identified wherever practicable.

The Authority also deals with a number of requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004, as well as Subject Access Requests under the Data Protection legislation. Officers have been continuing their review of the Authority's records management systems in tandem with a major project to introduce Microsoft Office 365. This project will also include a review of our Access to Information Policy, data storage and document retention. Once completed the review will significantly improve the Authority's compliance with the General Data Protection Regulation (GDPR) and new Data Protection Act. These new measures will also streamline requests for information and improve the overall efficiency, effectiveness and security of our records management and ICT processes.

The Authority is subject to a full and independent audit of the financial management arrangements in place for 2021/22. Audit reports are issued by the External Auditors and Internal Auditors to be considered by the Authority's Resources, Audit and Performance Committee.

In March 2017 the Resources, Audit and Performance Committee approved an Assurance Framework which specifies the sources of information on which the Authority relies to gain assurance that all key risks are identified and that controls are operating effectively. The Resources, Audit and Performance Committee on 1 March 2021 also approved an Internal Audit Charter which clearly defined the purpose, authority and responsibility of the internal audit activity; at the same meeting the Committee also approved the Audit Plan for 2021/22.

Services are required to review policies and procedures to ensure those services are delivered, designed and continually monitored to meet the needs of the whole community. As part of its response to the original Landscapes Review, the Authority set up an officer group to review, under the heading of 'New Forest Voices', our approach to accessibility and diversity both within the organisation and the geographic area. Meetings of the group will continue into 2022/23 working around three streams – understanding, experiences and ways of working.

Working together to achieve a common purpose with clearly defined functions and roles

Standing Orders, Scheme of Delegations, Financial Regulations, Contract Standing Orders and other procedures describe how the Authority operates and how decisions are made to ensure that these are efficient, transparent and accountable to local people. All these key policies were kept under review during the year and amendments made as and when necessary (for example following the coronavirus pandemic outbreak). A full review of all the above documents took place during the autumn of 2019 and the amended drafts were submitted firstly to the Standards Committee in October 2019 and then to the Planning and Resources, Audit and Performance Committees in March 2020.

Meetings of the Authority are held in public, save for individual items of a sensitive nature properly considered in confidential session. Agendas and minutes of meetings are available for inspection on the Authority's website. Members of the public may ask questions and make representations in person / remotely on relevant matters at meetings. Each of the committees has distinct terms of reference, with each having a periodic review. Member attendance for the Authority and Committee meetings during the year was 81% (very close to the annual target of 82%).

The roles and responsibilities of the Members and Officers are further defined in Member/Officer job descriptions and there is a Local Protocol for Member and Officer Relations - we are currently awaiting the official government response to the recent Landscapes Review consultation which further considered governance structures within National Park Authorities. The roles of Chief Executive, Monitoring Officer and Chief Finance Officer are filled, with each officer fully understanding their respective responsibilities – none of the holders of these roles have changed during the year.

The effect of strong budgeting and regular financial monitoring procedures has also shown in the financial outturn; for example, in recent years the Authority's outturn has always been within the targeted 2% of the original budget and 1% of any revised budget.

On 21 January 2016, Defra approved a four-year grant settlement; for the Authority that covered the four-year period to 2019/20 and included a 1.72% inflationary rise each year, ensuring that the Authority's budgets were protected in real terms over that four-year cycle. Following the end of that period, the Authority has received "frozen" grant settlements, therefore equating to small reductions each year in real terms. In March 2021, the Authority also agreed its Medium-Term Financial Plan to cover the period to March 2024, two years beyond the grant settlement period. We have been advised by Defra of a new single-year grant settlement for 2022/23, with the same cash amount as 2021/22 (no inflationary rise).

There are agreed protocols for consultation with the Chief Finance Officer on key decisions and advice to the Authority and its Committees. The CFO attends meetings of the Authority's Executive Leadership Team, Strategic Leadership Team and Executive Board in order to ensure a sound understanding of the organisation's key priorities and risks.

The role of the Monitoring Officer is performed in-house by the Senior Solicitor with a remaining nil-cost service level agreement with Hampshire County Council for any additional specialist legal support required. All such service level agreements are reviewed, and their performance monitored.

Promoting and demonstrating values through high standards of conduct and behaviour

There are Codes of Conduct for Members and Officers in place and performance appraisal processes for officers. Training is given to Members on the Code of Conduct and there is a complete Register of Members' Interests. The Authority operates a standards regime for the conduct of Members in compliance with the Localism Act 2011. There is currently a Standards Committee which monitors the ethical framework of the Authority. An internal audit review into the 'Corporate Governance Framework for Members' was undertaken this year and received the second highest assurance level.

There is an adopted Whistleblowing Policy, with confidential reporting arrangements in place to enable internal and external whistleblowing. There is also an Anti-fraud & Corruption Policy in place and a supplementary Anti-Money Laundering Policy. The Authority's core 'Values' were included in the 2021/22 staff annual appraisals to provide an opportunity for staff to consider how they have put the Authority's values into practice; ideas to promote the values covered on the Authority intranet.

The Monitoring Officer continuously reviews the Authority's Standing Orders and Scheme of Delegations and updates them as and when necessary. The Authority's Committee structure is also kept under review as is the meetings timetable to facilitate long term planning and diarising of meetings.

Taking informed and transparent decisions and managing risk

There is a systematic strategy, framework and processes for managing risk. The Risk Management Strategy was updated and reviewed in December 2015. The risk register was reviewed in 2019 and focuses on those projects where the risk of not achieving them would have a significant impact on the Authority. These projects are grouped in the register under Protect, Enjoy and Prosper. Significant operational risks potentially affecting the Authority have been grouped under Achieving Excellence. Risks are scored by likelihood and impact to give a green, amber or red warning level and regular consideration is given to appropriate measures and strategies to mitigate the risks – the risk register details eighteen key risks across the organisation and as of May 2022, eleven risks were green, seven amber and none red. The register is monitored and reviewed by the Executive Board and half-yearly by the Resources, Audit and Performance Committee.

The risks associated with our annual work programme are monitored through the quarterly reports to RAPC using the traffic light system to monitor progress. Members oversee the strategic direction and annual objectives. This enables relevant risks to be identified and evaluated, with consideration given to appropriate mitigation strategies.

The Authority complies with the Local Government Transparency Code and, as such, has a designated page on its website containing all the information required to be published; in a number of cases the Authority has actually gone beyond the minimum requirements of the Code and published further information to better aid understanding and transparency.

The Authority is fully compliant with all current procurement legislation including the Public Contract Regulations 2015. It uses an online e-procurement portal (In-Tend) for all significant quote/tender/framework opportunities, ensuring openness and fairness to all potential suppliers.

Developing capacity to be effective

Senior Officers' learning and development needs are identified and met through induction programmes and the appraisal system, which includes learning and development target areas. Eleven Authority staff have undertaken a bespoke 'Leading the Green Revolution' development programme this year, designed and led by an external consultant and our Chief Executive. All new Members undergo a full internal induction programme and are actively encouraged to attend a general 'National Parks' induction.

There have been a number of informal training sessions for Members and Members Days on various aspects of their responsibilities and to aid the development of policy, these include training days for the Partnership Plan, planning committee members and meetings with representatives from Forestry England.

The Authority seeks to continually train its Managers and Officers; advocating mental health wellbeing in the workplace is an important part of the People Plan and we have arranged training and certification of number of Mental Health First Aiders to assist staff with crisis intervention and to act as advocates of mental health wellbeing in the workplace. We have also arranged mental health awareness courses for all staff and managers - this will be an ongoing programme designed to provide staff with an understanding of mental health enabling us to build resilience and apply self-care and has helped managers recognise the early warning signs of poor or declining mental health within their team to enable early intervention and signposting. This has been particularly important during the current pandemic and lockdown periods which can impact employees' mental health and wellbeing.

Other important developments and training include Emergency First Aid at Work, Discovery Days and many more specific personal development courses. Officers continue to be encouraged to complete relevant courses through the e-learning portal which offers a wide range of training and development opportunities for all staff.

Engaging with people to ensure accountability

The Authority has developed and maintained a range of relationships and arrangements with other agencies in the public, private and voluntary sectors, to ensure that they are able to engage with and contribute to the work of the Authority.

Following the launch of the Accord between Forestry England and National Parks England in July 2018, members agreed that although there was a significant amount of engagement with Forestry England, there was good case for more formal mechanisms that would ensure more effective and collaborative working as well as early engagement and identification of opportunities and solutions. Officers from both Forestry England and the Authority accordingly held a number of workshops to finalise proposals for delivering local outcomes for the shared priorities. At the November 2020 meeting of the Resources, Audit and Performance Committee, members were updated on joint working activities between Forestry England and the Authority in relation to each of the 5 priority areas of joint working mentioned in the Accord, namely:

- Decision making that enhances National Park landscapes and the woodlands in them
- Woodland creation and expansion in National Parks
- Exemplary FE and NPA owned/managed woodlands in National Parks
- Woodland grant schemes fit for the future
- National Parks woodlands for people

At that meeting it was noted that 50% of the New Forest National Park was under the management of Forestry England and the two organisations were working hard to develop local outcomes that interpreted the national accord at the local level. There was a strong and mutually supportive relationship which had been reflected during the summer months, in particular the pressures that were placed on the Forest from the pandemic.

A Statement of Community Involvement (SCI) setting out how the National Park Authority would involve local communities and others in its work was approved by the Authority on 12 December 2013. Although the production of the SCI is a requirement of the Government's planning regulations, updating the document also provided an opportunity for the Authority to set out how people can get involved in the preparation of the Authority's other plans and strategies.

Member representation has continued with a number of external bodies such as the Court of Verderers, the Hampshire and Isle of Wight Local Government Association, New Forest Local Access Forum, New Forest Marque and Campaign for National Parks.

The Authority continues to work with local businesses to deliver Local Information Points to promote visitor information in the National Park. Our core ranger work is boosted by jointly funded projects with Forestry England and New Forest District Council, enabling us to engage with visitors and local residents throughout the National Park and in nearby communities. Other examples of joint working include the developing the Green Halo Partnership (supporting the local economy, improved health and wellbeing encouraging sustainable living and enhancing the natural environment) and Hampshire Greenprint.

The Authority continued to develop contacts during the 2021/22 year to promote understanding of the National Park (despite having to curtail some such events during some parts of the year due to the pandemic). This included work with schools to highlight the things that make the New Forest special and how we can all care for it. They also assisted with the delivery of Green & Blue Horizons projects and supervised multiple conservation tasks for volunteers of all ages.

Progress continued to be made on the Recreation Management Strategy review during 2021/22. The [Recreation Management Strategy](#) sets out the strategic direction for the management of outdoor recreation in the New Forest National Park from 2010 – 2030. The strategy seeks to guide and influence recreation and spatial planning policy and implementation across the whole of the National Park and adjoining areas. Work to manage recreation in partnership with other organisations is ongoing through the Recreation Management Steering Group and Advisory Group. This includes both issue-specific activities and wider strategic work.

The Authority has continued to support and input into the New Forest Consultative Panel, which is an advisory forum comprising representatives from approximately eighty organisations with an interest in the New Forest National Park and adjacent areas. It meets quarterly (virtual meetings) to discuss topical issues and provide views to the National Park Authority and other statutory bodies. We also facilitate other Forums with wide representation from relevant organisations to help guide and communicate work programmes relating to dog walking, cycling, equine issues, animal accidents and recreation management.

The New Forest Land Advice Service has continued to provide wide-ranging support to landowners, land managers and young commoners throughout the year.

The Authority routinely consults Parish Councils for their views on all planning applications by providing them with an initial planning officer assessment alongside details of the application. Communication has been aided further with the successful Parish Quadrant meetings which are held throughout the year and the Member presence at Parish Councils.

The Authority published, or engaged with, the New Forest Essential Guide, Park Life, a Pocket Guide and an Annual Report to ensure regular communication on our work performance and issues and opportunities, together with events, press releases, regular email newsletters, website updates and social media posts.

Continuous Improvement

In December 2018, the Authority fed into the Landscapes Review – Call for Evidence (often referenced as the ‘Glover Review’), reflecting views expressed by members and staff to the questions raised. The final review document was published on 21 September 2019 and the Authority clearly set out its initial response to react positively to its thoughts and recommendations. In January 2022, the government published their response to the original report recommendations and undertook a 12-week open consultation to which the Authority responded in April. We now await the feedback and response to that consultation.

The Authority aims to be clearly accountable for the effective delivery of services, through setting targets and measuring performance. A revised and streamlined set of key national performance indicators continue to be applied and these indicators as well as a set of local indicators are monitored regularly by the Resources, Audit and Performance Committee.

Objectives and targets are developed for each service, and performance reviewed against these. Despite the effects of the pandemic and the uncertainty of our grant, the Authority is using the period of financial stability in 2021/22 to review its efficiency and effectiveness and to plan more strategically. Senior officers from National Park Authorities are constantly exploring possible savings and efficiencies in sharing best practices and, in some cases, sharing services.

Service level agreements with New Forest District Council provided the services of strategic HR advice, internal audit, GIS and some financial services. The Authority also provides services to other local bodies through SLAs; this included archaeology, rangers and communications services during the last year. The Authority also asked the District Council to undertake a Health & Safety Review of the Authority's policies and practices – this has recently made a number of recommendations which will be further reviewed and enacted in 2022/23.

Review of Effectiveness:

The Authority has responsibility for conducting, 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 Officers within the Authority who have the responsibility for the development and maintenance of the governance environment, the Internal Auditor's report and also by comments made by the external auditors and other review agencies and inspectorates.

Factors which influence the controls environment include: ethics, integrity, operating style and the way management and Members assign responsibility and authority.

The roles of the Authority, the Resources, Audit and Performance Committee and Internal Audit are explicit in maintaining the effectiveness of the governance framework.

Of the thirty-nine Actions/Outcomes in the 2021/22 Work Programme, there were twenty-nine green, nine amber and one red.

Major strategic plans and policies receive consideration by Members. A comprehensive scheme of delegation to Officers has been approved by Members and makes clear that the role of Officers is to implement and give effect to strategies and policies approved by the Authority. The scheme and other constitutional documents of the Authority have been revised in response to changes in governance brought about by the pandemic including holding largely virtual meetings during 2020/21.

The Authority has maintained arrangements to ensure that its dealings are lawful and comply with financial regulations. The Authority's Solicitor considers all reports considered by Members and is present at meetings to give advice to Members as required. This assists in ensuring that the Authority discharges its functions in accordance with the law.

Members have a key role in providing assurance that the Authority's funds are used economically, efficiently and effectively in accordance with agreed policies. The Medium-Term Financial Plan and Budget is agreed annually by the Authority and budget monitoring reports are considered quarterly at meetings of the Resources, Audit and Performance Committee. The Authority's Accounts are subject to external audit on an annual basis and reported to the Authority at a public meeting.

There were two complaints made against members during the year. Following an investigation, neither of these were taken forward.

All Member meetings of the Authority commence with an item regarding declaration of pecuniary and non-pecuniary interests, with signed records of interests declared kept with the minutes of the meeting. A Register of Members' Interests is maintained, in accordance with the Local Government Act 2000.

The Internal Auditor's report for 2021/22, considered at the Resources, Audit and Performance Committee meeting on 6 June 2022, states:

"I am satisfied that sufficient assurance work has been carried out to allow me to form a reasonable conclusion on the adequacy and effectiveness of the New Forest National Park Authority's internal control environment. In my opinion, the New Forest National Park Authority's framework of governance, risk management and control is 'Reasonable' and audit testing has demonstrated controls to be working in practice. Where weaknesses have been identified through internal audit review, we have worked with management to agree appropriate corrective actions and a timescale for improvement."

[Note: audit assurance levels are graded as either substantial, reasonable, limited or none]

Ernst & Young act as the Authority's external auditors and are responsible for reviewing and reporting on the Financial Report (Statement of Accounts) and arrangements for securing economy, efficiency and effectiveness in the use of resources.

The Authority's Business Continuity Plan was updated and reviewed during 2017/18 and audited by the internal auditors with a reasonable level of assurance and a limited number of management actions which have been agreed to by officers. This Plan was reviewed again by internal audit during 2021/22 to consider the recent pandemic arrangements and any lessons that can be learned from them for possible future scenarios.

In response to the 2020 Coronavirus Pandemic, the Authority closed its offices to the public and staff were requested to work from home where possible. The Authority held its first virtual meeting of the Planning Committee in April that year and, from that point, all Authority and Committee meetings were held virtually. During 2021/22 the pandemic situation improved meaning that public meetings have been held in-person again, with the live streaming continued whenever possible, and staff have now begun to use the offices more frequently again. Our rangers and other staff continued their engagement and campaigns in the Forest with partners. Planning application numbers continue to mirror those seen in years prior to the pandemic and the Authority maintained a high-quality planning service within the overall constraints of the pandemic.

The wellbeing of our staff was monitored very closely during this last year, including the continuation of the Wellbeing Group, a full staff survey completed in Summer 2021, regular All-Staff Team meetings and an increased frequency of Health & Safety Forum meetings.

Significant governance issues:

Following the adoption of the National Park-wide Partnership Plan in early 2022, the Authority will now prioritise the updating of its own Business Plan during 2022/23, to include a further review of its provisional annual Work Programme and its monitoring framework.

The Authority's review of its Counter Fraud policies and procedures, in light of updated code of practices and self-assessment toolkit from the Chartered Institute of Public Finance & Accountancy (CIPFA) and International Framework for Good Governance in the Public Sector, was not progressed as expected in 2021/22 due to other pressures and so this work will be prioritised in 2022/23 to ensure the Authority continues to follow best practice.

As mentioned above, the Authority will look to complete its, broader/longer than expected work on establishing best practice in records management across the organisation, thus ensuring compliance with data protection legislation (including the new GDPR) and retention schedules. The Authority will also give full consideration to the new Financial Management Code with a view to its full implementation in 2022/23.

CERTIFICATION

To the best of our knowledge, governance arrangements, as defined above have been in place within the Authority for the year ending 31 March 2022 and up to the date of approval of the Annual Report and Statement of Accounts.

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

Signed:

Signed:

Prof. Gavin Parker
Chairman

Alison Barnes
Chief Executive

Date: xx October 2022

Date: xx October 2022