



# Annual Governance Statement 2018/19

**FINAL**

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## 1. Executive Summary

The Leader of the Council and Interim Chief Executive recognise the importance of having appropriate processes and controls in place to run the Council and ensure its services are delivered effectively.

The Council is required to produce an Annual Governance Statement (AGS) which describes how its corporate governance arrangements have been working. The Council's Audit Sub-Committee review the production of the AGS and considers and scrutinises the content.

Bromley is a Member led, commissioning authority, delivering services through whoever is best placed to provide quality and value for money to its residents, who are supported to manage their lives with the minimum of intervention from the Council. 'Building a Better Bromley' contains the guiding principles for Bromley Council. Following public consultation, in 2016 Bromley Council updated and relaunched the priorities contained in the vision and strengthened links with key partner organisations to help deliver important outcomes for residents, businesses and visitors to Bromley.

### [Building a Better Bromley \(2016-2018\)](#)

Bromley's governance framework comprises the systems and processes, culture and values, by which the authority is directed and controlled, and the activities through which it accounts to, engages with and leads its 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 services and value for money.

The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of Bromley's policies, aims and objectives; to evaluate the likelihood and potential impact of those risks being realised, and to manage them efficiently, effectively and economically.

The governance framework has been in place at Bromley for the year ended 31 March 2019 and up to the date of approval of the Leader's Foreword and Statement of Accounts.

The Council conducts an annual review of its governance arrangements, including the system of internal control. The purpose of the review is to provide assurance from a number of sources including Members, Chief Officers, internal and external audit, other review agencies and inspectorates that corporate governance arrangements are adequate and operating effectively; or where gaps are revealed, action is planned that will ensure effective governance in future.

With substantial additional savings to be made over the next four years, the financial situation continues to drive the future direction and work of the Council.

## 2. Significant Governance Issues

Overall, we can confirm that the Council has appropriate systems and processes in place to ensure that good governance is maintained in line with the 'Delivering Good Governance in Local Government Framework, 2016 Edition'. Whilst we are satisfied that these generally work and can be regarded as fit for purpose, we have identified a number of areas for improvement.

Progress made in dealing with the governance issues identified in the 2017/18 Annual Governance Statement is detailed on pages 18 - 20.

Four areas, detailed overleaf, have been identified as requiring further work during 2019/20:

Governance Issue	Action	Lead Officer
<p><b>Finance</b> Capacity to make further budget savings and maintain frontline services. The Council has set a balanced budget for 2019/20 without a detrimental impact on key services. There are significant mitigation options to partly offset growth/cost pressures being implemented for 2019/20. Significant challenges remain for 2020/21 and beyond.</p>	<p>Work is ongoing to explore options to address the future years' budget gap through the four year forward planning arrangements.</p> <p>Draft 2019/20 budget and update on Council's financial strategy 2020/21 to 2022/23 report to Executive on 16<sup>th</sup> January 2019 identified the 'One Council' approach and new arrangements for a Transformational Review and Core Statutory Minimum Requirements review to explore further budget choices.</p> <p><a href="#">Draft 2019/20 Budget and update on Council's Financial Strategy 2020/21 to 2022/23</a></p>	<p><b>Director of Finance</b></p>
<p><b>Health and Safety/Fire Safety Compliance</b> Strengthen the Health and Safety Management systems and processes across the Council ensuring compliance with good practice.</p>	<p><b>Health and Safety Risk Assessments</b> Compile a full suite of comprehensive Health and Safety Risk Assessments, demonstrating that Health and Safety Risks have been established and action plans are in place to implement controls.</p> <p><b>Fire Safety Risk Assessments</b> Action is being taken to address the site management issues identified in the Operational Property Estate Fire Risk Assessments:-</p> <ul style="list-style-type: none"> <li>• A person responsible for fire safety is identified at each building</li> <li>• Contractors occupying buildings are carrying out fire safety properly, if their responsibility</li> <li>• Suitable training/guidance is delivered either in house or externally, to ensure that responsible personnel are enabled to carry out their duties correctly and with confidence.</li> </ul>	<p><b>Director of Human Resources and Customer Services</b></p>
<p><b>Contract Management and Monitoring</b> Strengthen control arrangements and effectiveness of Contract Management.</p>	<p>Clarify and communicate to all staff their roles and responsibilities in respect of the management of key contracts.</p> <p>Monitor compliance against Contract Procedure Rules Contract Monitoring requirements, identifying any issues for action to be taken through the Chief Officers' Executive/Corporate Leadership Team.</p> <p>Via the Procurement Board, periodically review contract management and contract monitoring issues for key contracts, feeding back any issues/actions to the Chief Officers' Executive/Corporate Leadership Team.</p> <p>Embed learning and best practice for contract management via Practice Notes on the Managers' Toolkit and through a quarterly Contract Owners Forum to ensure governance compliance and consistency.</p>	<p><b>Assistant Director, Governance and Contracts</b></p>

**Valuation of Fixed Assets**

Issues have been identified relating to the methodology used for the valuation of fixed assets for reporting in the Council's 2018/19 Statement of Accounts. It is clear that a revised approach is necessary which will require significant work relating to a full re-valuation of the Council's assets.

The Council's Assistant Director, Strategic Property, is working with our external real estate property advisors/valuers to ensure that this work is completed within a timescale to allow restatement of the Council's accounts prior to the end of the current financial year.

**Assistant Director, Strategic Property**

### 3. What is Corporate Governance?

#### 3.1 Definition

The CIPFA International Framework 'Good Governance in the Public Sector' defines governance as:-

*'The arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved'*

It also states that:-

*'To deliver good governance in the public sector, both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times'*

*'Acting in the public interest implies primary consideration of the benefits for society, which should result in positive outcomes for service users and other stakeholders'*

Governance is about how local government bodies ensure that they are doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner. It comprises the systems and processes, cultures and values, by which local government bodies are directed and controlled and through which they account to, engage with and, where appropriate, provide leadership to their communities.

Effective corporate governance and the capacity to lead and manage change are essential to meet the ever increasing challenges for the public sector. Good governance is important to all involved in local government and a key responsibility of the Interim Chief Executive, the Leader of the Council and other statutory governance Chief Officers.

Our governance framework comprises the culture, values, systems and processes by which the Council is directed and controlled. It brings together an underlying set of legislative and regulatory requirements, good practice principles and management practice.

**Bromley Council recognises that:**

- ▶ Good governance leads to good management, good performance, good stewardship of public money, good public engagement and, ultimately, good outcomes for residents and service users
- ▶ Good governance enables an authority to pursue its vision effectively, as well as underpinning that vision with appropriate mechanisms for control and management of risk
- ▶ All authorities should aim to meet the standards of the best and governance arrangements should not only be sound, but also be seen to be sound.

**3.2 The Principles**

**Principle A – Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law**

**How we do this**

- Having regard for the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership
- Being accountable for decisions to the public and co-operating fully with whatever scrutiny is appropriate to one’s office
- Commitment to promoting an anti-fraud and corruption culture evidenced through a detailed anti-fraud and corruption policy and ensuring fraud and corruption are dealt with effectively
- Adherence to ethical values and respect for the rule of law
- Creating a culture where statutory officers and other key post holders are able to fulfil their responsibilities

**Principle B – Ensuring openness and comprehensive stakeholder engagement**

**How we do this**

- Ensuring transparency of decisions supported by an effective scrutiny and challenge process
- Consulting with residents during the budget setting process for 2019/20 and beyond
- Demonstrating engagement with all groups of stakeholders to determine the most appropriate course of action/effective intervention
- Ensuring a clear, evidence based, decision making path

## Principle C – Defining outcomes in terms of sustainable, economic, social and environmental benefits

### How we do this

- Having a clear vision and strategy, with key partner organisations through ‘Building a Better Bromley’
- Delivering defined, sustainable outcomes within the limits of resources and authority
- Balancing competing demands with finite resources when determining priorities; managing service users’ expectations effectively with regard to determining priorities and making the best use of the available resources
- Taking a longer term view with regard to decision making, taking account of potential conflicts between the organisation’s vision and short term factors such as financial constraints

## Principle D – Determining the interventions necessary to optimise the achievement of the intended outcomes

### How we do this

- Having a clear vision and strategy setting out our intended outcomes for citizens and service users
- Ensuring decision makers receive a robust best value option analysis detailing associated risks and outcomes to be achieved
- Considering stakeholder feedback and future impact when making decisions about service delivery, prioritising competing demands

## Principle E – Developing capacity including the capability of leadership and individuals

### How we do this

- Ensuring that the decision making process is clearly defined and supported by protocols to ensure a shared understanding of roles and objectives is maintained
- Ensuring Members and Officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities, reflecting the structure and diversity of the community
- Evaluating, and supporting, staff performance through regular reviews which take into account training and development needs
- Supporting the workforce to maintain their health and wellbeing

## Principle F – Managing risks and performance through robust internal control and strong public financial management

### How we do this

- Regular review of Corporate and Departmental Risks and Risk Registers
- Integration of effective risk management arrangements into the decision making process
- Ensuring an effective scrutiny function which provides a constructive challenge and allows for debate at all stages of the decision making process
- Ensuring effective counter fraud and anti-corruption policies are in place and there is good staff awareness
- Having an effective Audit Sub-Committee whose remit incorporates financial delegation, fraud prevention, internal and external audit

## Principle G – Implementing good practices in transparency, reporting, and audit to deliver effective accountability

### How we do this

- Publishing information on our activities and decisions
- Maintaining a rigorous, effective and transparent decision making and scrutiny process
- Ensuring that public reports are easily accessible and use a style appropriate to the intended audience
- Embracing peer challenge, reviews and inspections from regulatory bodies, implementing recommendations for corrective action as required
- Maintaining an effective internal and external audit service, with direct access to Members

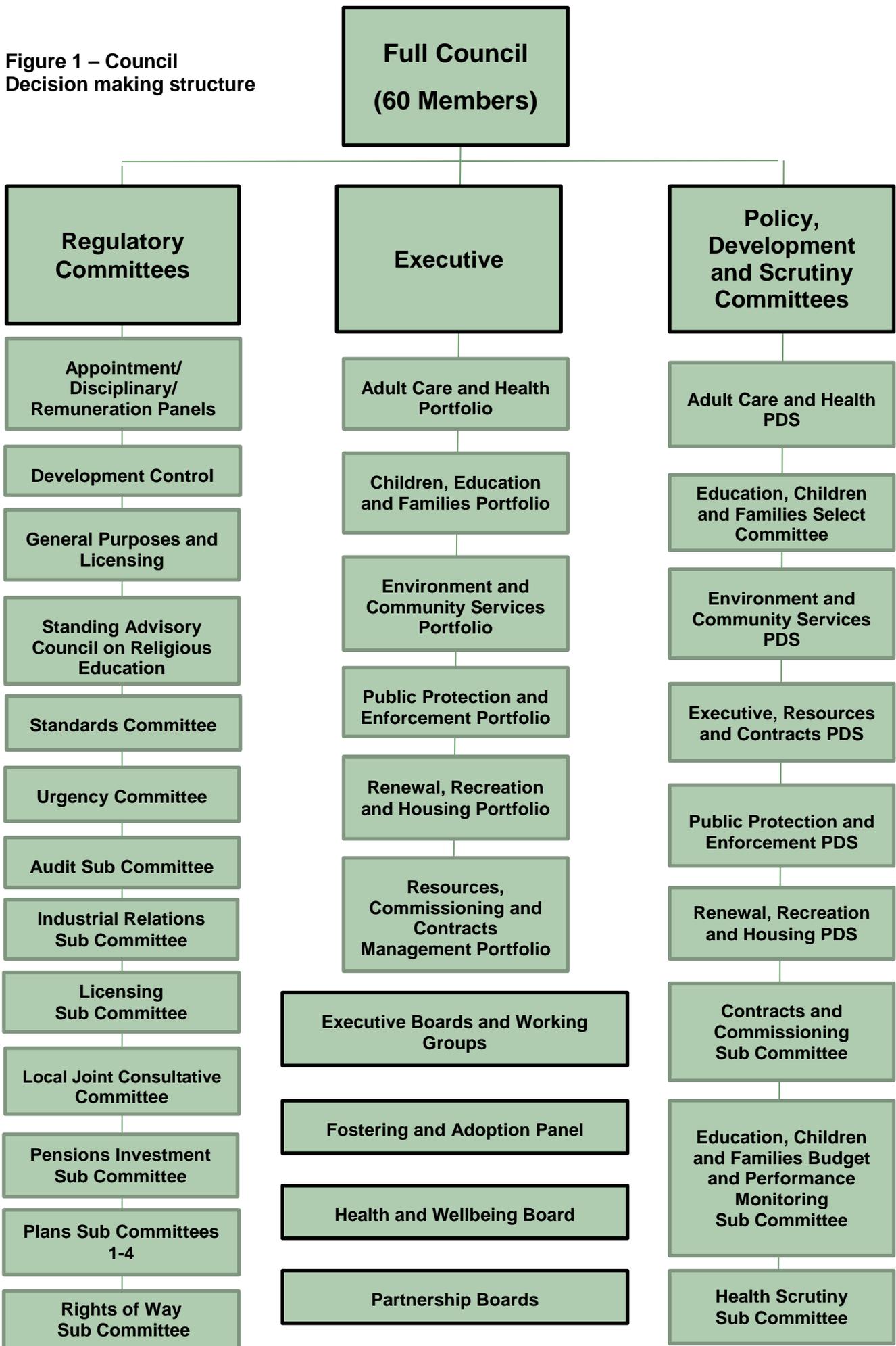
## 4. The Council - How it Works

This Annual Governance Statement covers the period 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2019.

The Council is made up of 60 Councillors with the decision making structure divided between Executive and non-Executive matters. Executive duties are carried out by an Executive body of Councillors, which includes the Leader and six Councillors with specific Portfolio responsibilities. Non-Executive duties are performed mainly by the Development Control Committee and the General Purposes and Licensing Committee.

The decision making structure is depicted overleaf:

Figure 1 – Council Decision making structure



## 5. Outcomes and Value for Money

### 5.1 Building a Better Bromley 2016-2018

Bromley Council will continue to reduce bureaucratic burdens whilst meeting its role in providing key services. An environment will be created where individuals and communities can thrive and where people can lead healthier, more independent and self-reliant lifestyles. This means that the authority can focus on supporting the Borough's most vulnerable residents with services underpinned by the principles of early intervention and prevention.

Bromley aims to create an environment where children and young people can be successful: supporting people into work; offering advice and signposting to self-help solutions, and working with partners to minimise crime and antisocial behaviour.

Bromley recognises that this activity cannot be done in isolation, so will continue strong support for the voluntary sector as well as working closely with outside bodies in the private and public sector.

Despite the unprecedented financial challenge, Bromley will serve and advocate on behalf of its residents and aim to deliver cost-effective services. Working with strategic partners, it will also continue to ensure that it receives the fairest deal from the Government on issues that are important to Bromley residents.

Bromley's achievements over the past year and plans for the future are reported in the Leader's Foreword and Statement of Accounts.

### 5.2 Portfolio Plans

Portfolio Plans set out each Portfolio Holder's aims in the current year and the supporting performance targets, using a range of national and local indicators. Overseeing the successful delivery of each plan is the joint responsibility of the Portfolio Holder and the Members of the appropriate Policy Development and Scrutiny Committee (PDS). The Portfolios are aligned to the priorities identified in Building a Better Bromley. In addition, the Health and Wellbeing Board is a collaboration between Bromley Council and various partner agencies whose role is to understand their local community's needs, agree priorities and encourage commissioners to work in a more joined up way.

[Adult Care and Health Portfolio Plan 2018/22](#)

[Children, Education and Families Portfolio Plan 2018/22](#)

[Environment and Community Services Portfolio Plan 2018/21](#)

[Public Protection and Enforcement Portfolio Plan 2018/19](#)

[Renewal, Recreation and Housing Portfolio Plan 2018/19](#)

Updates on progress are reported to Members through the Policy, Development and Scrutiny process. Examples of this include:

[Adult Care and Health Portfolio Plan 2018/2022 - Quarter Two update covering report \(November 2018\)](#)

[Adult Care and Health Portfolio Plan 2018/2022 - Quarter Two update on progress \(November 2018\)](#)

[Education, Children and Families Portfolio Plan 2018/2022 - Quarter Two update covering report \(October 2018\)](#)

[Education, Children and Families Portfolio Plan 2018/2022 - Quarter Two update on progress \(October 2018\)](#)

[Renewal, Recreation and Housing Portfolio Plan 2018/19 - Quarter Two update covering report \(January 2019\)](#)

[Renewal, Recreation and Housing Portfolio Plan 2018/19 - Quarter Two update on progress \(January 2019\)](#)

[Public Protection and Enforcement Performance Overview \(January 2019\)](#)

[Environment and Community Services Performance Overview \(February 2019\)](#)

### 5.3 Managing our Resources (Value for Money)

The Council's external auditors issued an unqualified opinion on the Authority's financial statements on 26<sup>th</sup> July 2018. This means that they believe the financial statements give a true and fair view of the financial position of the Authority and of its expenditure and income for the year. The financial statements include those of the Pension Fund.

The audit procedures are designed to:

- ▶ Identify misstatements which are material to their opinion on the financial statements as a whole. Materiality for the Authority's accounts was set at £9 million which equates to around 1.5% of gross expenditure;
- ▶ Detect errors in specific accounts at a lower level of precision. Materiality for the Pension Fund was set at £9 million which is approximately 0.99% of gross assets.

The external auditors identified one audit adjustment with a total value of £1.36 million relating to the reclassification of a property from assets held for sale to surplus assets. This adjustment does not result in a change in the reported deficit on provision of services or a net change in the general fund balance. The external auditors stated that they were provided with a good first draft of the financial statements. Their audit work was designed to specifically address the following significant risks for which no issues were identified:-

- ▶ **Management Override of Controls** – The audit methodology incorporates the risk of management override as a default significant risk;
- ▶ **Valuation of PPE (Plant, Property and Equipment)** – The authority has adopted a rolling revaluation model which sees all land and buildings revalued over a five year cycle. As a result of this, individual assets may not be revalued for four years. This creates a risk that the carrying value of those assets not revalued in year differs materially from the year end fair value;
- ▶ **Pension Liabilities** – Valuation of the Local Government Pension Scheme relies on a number of assumptions, most notably around the actuarial assumptions and actuarial methodology which results in the Authority's overall valuation;
- ▶ **Faster Close** – The timetable available to produce draft accounts was reduced by one month and the overall time available for completion of both accounts production and audit is two months shorter than in previous years.

Whilst not explicitly covered by the audit opinion, the external auditors reviewed other information that accompanies the financial statements to consider its material consistency with the audited accounts. For 2017/18, they reviewed the Annual Governance Statement and Narrative Report. They concluded that they were consistent with their understanding and did not identify any issues.

There were no significant issues arising from their audit of the pension fund and the external auditors issued an unqualified opinion on the pension fund financial statements as part of their audit report.

A qualified 'except for' conclusion was issued on the authority's arrangements to secure value for money (VFM conclusion) for 2017/18 on 26<sup>th</sup> July 2018. This means that the external auditors were satisfied that during the year the Authority had appropriate arrangements for securing economy, efficiency and effectiveness in the use of resources, except for the area of children's services where the authority received an 'Inadequate' Ofsted inspection in June 2016 and these findings had not yet been fully remediated. This was an ongoing issue from previous years. To arrive at their conclusion, external audit looked at the Authority's arrangements to make informed decision making, sustainable resource deployment and working with partners and third parties. It should be noted that Ofsted subsequently judged children's services as 'Good' across all practice areas and the impact of leaders on social work practice has been judged as 'Outstanding'.

The audit cannot be formally concluded and an audit certificate issued as the external auditors are currently considering elector queries relating to 2016/17 and 2017/18. Until they have completed their consideration of these, they are unable to certify that they have completed the audit of the accounts in accordance with the requirements of the Local Audit and Accountability Act 2014.

The detailed approach of the Council towards budgeting over the medium to longer term was reported to Executive on 16<sup>th</sup> January 2019.

#### [Draft 2019/20 Budget and update on Council's Financial Strategy 2020/21 to 2022/23](#)

Although the London Business Rate Pilot provides additional income in 2019/20, there is uncertainty on the impact of full devolution of business rates, awaited Spending Review and the outcome of the Government's 'Fairer Funding' review which may result in new responsibilities for the Council and associated risks. The changes are not expected to be implemented until at least 2020/21, whilst the fiscal squeeze for local government is expected to continue beyond that period and a possible future recession provides significant financial risks. The continuation of long term financial planning as part of the Medium Term Financial Strategy remains essential to ensure that any future service challenges are managed effectively.

The Budget Strategy has to be set within the context of a reducing resource base, with Government funding reductions likely to continue beyond 2020 – the on-going need to reduce the size and shape of the organisation to secure priority outcomes within the resources available. There is also a need to build in flexibility in identifying options to bridge the budget gap, as the gap could increase further. The overall updated strategy has to be set in the context of the national state of public finances, with the fiscal squeeze for local government continuing.

The background to the impact of the real reductions in government funding within the local authority landscape was reported to the January 2019 meeting of the Executive. Bromley has delivered savings of over £97m since 2011 and has a low cost base which makes further savings more challenging. Real term reductions in Government funding, future year cost pressures and new burdens are expected to continue over the next four years.

The Council is 'better placed' than many other authorities due to remaining debt free, has retained adequate level of reserves and maintained adequate provisions in the Council's revenue budget for unforeseen costs and risks. The Council has maintained four year financial planning despite the future funding uncertainty (awaited Spending Review, Fair Funding review and devolution of business rates from 2020/21) and it remains essential that action is taken to address any in year overspends, recognising that there could be a full year impact which could increase the 'budget gap' further. Apart from continuing the 'One Council' approach as reported to the January 2019 meeting of the Executive, the further new measures relating to the Transformational Review and Core Statutory Minimum Requirements review are essential to identify options from 2020/21 to address the medium term budget gap and ensure the Council can continue to 'live within its means'. It also remains essential that Chief Officers identify mitigating action to address any in year cost pressures/new burdens to remain within their 'cash envelope'.

Stewardship and delivering sustainable finances are increasingly important whilst cost pressures and the Government's fiscal squeeze continues. The strategy needs to remain flexible and the Council's reserves resilient to respond to the impact of volatile external events and the structural budget deficit.

This year we sought to collect views from residents through meetings with residents' associations and by requesting views through media and social media as the Council sets the budget for 2019-20 and beyond.

Two round table meetings for representatives of the Borough's residents' associations were held at the Civic Centre. These meetings were attended by 57 people from 29 associations, out of the 131 associations invited from across the Borough. Background information was uploaded to the Council's website, distributed to the residents' association representatives and highlighted to the wider audience through media and social media. Residents were invited to get in touch through the Leader's mailbox and say what they think the Council is doing well, where they believe improvements could be made and a greater focus placed, and how we can work together better to keep and improve our Borough as the great place it is to live, work, do business and relax in, as we move to the future.

Residents' comments will be considered as the Council prioritises key issues and as Councillors make decisions on the Council's services into the future. A bullet point summary of the observations made by residents at the meetings and through E mail and social media can be found in Appendix 9 (page 91 onwards) of the Draft 2019/20 Budget and update on the Council's Financial Strategy 2020/21 to 2022/23.

[Draft 2019/20 Budget and update on Council's Financial Strategy 2020/21 to 2022/23](#)

## 6. How do we know our arrangements are working?

### 6.1 The Role of Management

The Corporate Leadership Team is responsible for the Strategic Leadership of the organisation, with managers having day to day responsibility for the management and control of service delivery. Our managers set the 'tone from the top' and develop and implement policies, procedures, processes and controls. They ensure compliance.

The Corporate Risk Management Group (CRMG), chaired by the Director of Finance and including the Head of Audit in its membership, oversees the Council's governance arrangements and delivery of the Annual Governance Statement.

This year, Internal Audit commissioned Zurich, in their capacity as the Authority's insurers, to carry out a series of 'check and challenge' sessions to review and refresh the departmental Risk Registers resulting in an updated suite reflecting the current risk profile of the organisation. Zurich attended the January 2019 Corporate Risk Management Group meeting to discuss the output, further strengthening Risk Management and controls within the Council. None of the registers required wholesale changes and a good general awareness and understanding of Risk Management was reported. Overall there was a good level of engagement and it was evident throughout those discussions that in the last couple of years, and in particularly recently, risk has become embedded and is more 'live'.

This year, a review of our governance arrangements was undertaken by Internal Audit, overseen by the Corporate Risk Management Group. As part of that review, the Council's Anti-Fraud and Corruption Strategy was updated and approved by the Audit Sub Committee on 26<sup>th</sup> February 2019. This also includes updates to the Raising Concerns (Whistleblowing Policy), Anti Bribery Policy and the Money Laundering Policy.

#### [Anti-Fraud and Corruption Strategy](#)

The Standards Committee of 22<sup>nd</sup> January 2019 considered the Monitoring Officer's General Report. This updated the Committee on a number of Standard issues including the Authority's Whistleblowing

policy (Raising Concerns), Dispensations granted by the Monitoring Officer and Members' Gifts and Hospitality Register entries.

### [Monitoring Officer's General Report 22nd January 2019](#)

The outcome of this is that we have adequate governance arrangements in place and relevant to the environment we work in.

## 6.2 The Role of the Audit Committee

The Council has appointed an Audit Sub-Committee which considers financial delegations, fraud prevention, internal and external audit. It is a sub-committee of the General Purposes and Licensing Committee and meets three times a year.

### [Audit Sub Committee Meetings \(Agendas, Papers, Minutes\)](#)

The Audit Sub-Committee plays an important role in ensuring that the Council learns from Internal Audit findings and rectifies identified weaknesses in control. All Priority One recommendations from Internal Audit are tracked by the Committee until implemented.

In January 2019, the Constitution Improvement Working Group concluded that allowing an Executive Member to sit on the Audit Sub Committee could, potentially, be perceived as compromising its independence. Following approval by Council, para 2.02 of the Constitution was amended to 'Audit Sub Committee (Membership proportional, and to exclude any member of the Executive)'.

## 6.3 Our Governance Framework

Key Policies/Processes/Posts/Functions in our Governance Framework include:

	Policy/Process
<b>A</b>	Annual Audit Letter
	Annual Governance Statement
	Anti-Bribery Policy and Procedures
	Anti-Fraud and Corruption Strategy
	Anti-Money Laundering Policy
	Audit Sub Committee
<b>B</b>	Building a Better Bromley
<b>C</b>	Capital Strategy
	Code of Conduct for Members
	Complaints System
	Constitution
	Contract Procedure Rules/Standing Orders
	Corporate Induction Process
	Corporate Leadership Team
	Corporate Operating Principles
	Customer Access Channel Strategy
	Customer Services Charter
<b>D</b>	DISCUSS Appraisal Scheme
<b>E</b>	Executive and Resources PDS Committee Annual Report
<b>F</b>	Financial Regulations
	Financial Strategy
	Forward Plan of Key Decisions
<b>G</b>	'Getting it Right' – Complaints, Compliments and Suggestions
	Gifts and Hospitality Code of Conduct
<b>H</b>	Head of Audit
	Head of Paid Service
<b>I</b>	Internal and External Audit Reports
	Internal Audit Opinion and Annual Report
	Internal Controls
	IT Governance
<b>L</b>	Leader's Foreword and Statement of Accounts
	Learning and Development
	Local Development Framework
<b>M</b>	Member/Officer Protocol
	Monitoring Officer (Director of Corporate Services)
<b>P</b>	Portfolio Plans
	Public Consultations/Meetings
<b>R</b>	'Raising Concerns' whistle blowing
	Register of Interests
	Risk Management Strategy
<b>S</b>	Scheme of Delegation
	Section 151 Officer (Director of Finance)
	Statement of Accounts
<b>T</b>	Treasury Management Strategy

## 6.4 Annual Governance Assurance Statement

Each member of the Corporate Leadership Team is required to confirm that:

**'In meeting my responsibilities above, I have:**

- ▶ Contributed to the review of Risk Registers and the outcomes
- ▶ Ensured that there are controls in place to mitigate the risks highlighted in the above exercise
- ▶ Considered relevant assessments of key service areas within the Department e.g. benchmarking, peer review
- ▶ Taken into account internal and external audit and inspection reports and results of follow ups regarding implementation of recommendations

**I am satisfied that to the best of my knowledge, the following procedures are in place:**

- ▶ The service is planned and managed in accordance with the Council's Corporate Operating Principles
- ▶ Business risks are identified, assessed and reported on a regular basis
- ▶ Key controls over systems and processes are in place to ensure the Council's assets are safeguarded
- ▶ Business Continuity Plans are maintained and reviewed as circumstances change
- ▶ The monthly Cumulative Spend Report has been reviewed and agreed as part of the Full Budget Monitoring System
- ▶ Key contract information is kept up to date in the Contracts Database to allow Contract Registers and other management information to be reported

Where unable to confirm all, or some of these, the areas for improvement and planned actions must be detailed'.

## 6.5 External Inspections/Peer Reviews

During the last year the Council has received the following assessments from other Inspectorates, agencies or Peer Reviews:

- ▶ Ofsted – Inspection of Children's Social Care Services (19<sup>th</sup> – 30<sup>th</sup> November 2018)  
[Ofsted - Inspection of Children's Social Care Services](#)  
[Press Release - 7th January 2019](#)  
[Press Release - 17th January 2019](#)
- ▶ Care Quality Commission – Review of Reablement (2<sup>nd</sup> May 2018, published 30<sup>th</sup> May 2018)  
[Care Quality Commission - Review of Reablement \(2nd May 2018\)](#)
- ▶ Ofsted – Inspection of Further Education and Skills (15<sup>th</sup> – 18<sup>th</sup> January 2019)  
[Ofsted - Inspection of Further Education and Skills \(15th - 18th January 2019\)](#)  
[Press Release - 8th March 2019](#)

- ▶ [Care Quality Commission – Review of Shared Lives \(2<sup>nd</sup> May 2018, published 30<sup>th</sup> May 2018\)](#)  
[Care Quality Commission - Review of Shared Lives \(24th January 2019\)](#)

## 6.6 The Role of Internal Audit

Internal Audit provides independent and objective assurance to the Council through its Audit Sub-Committee, to support them in discharging their responsibilities under S151 of the Local Government Act 1972, relating to the proper administration of the Council's financial affairs, and is a key component of Corporate Governance within the Council.

An independent Internal Audit function will, through its risk-based approach to work, provide assurance to the Council's Audit Sub-Committee and senior management on the higher risk and more complex areas of the Council's business, allowing management to focus on providing coverage of routine operations.

Internal Audit's objectives include supporting a positive culture of internal control improvement, effective risk management and good governance. The purpose, authority and responsibility of the internal audit activity are formally defined in the Internal Audit Charter, which will be periodically reviewed and presented to senior management and the Audit Sub-Committee for approval.

## 6.7 The Role of the Head of Audit and Opinion on Governance Risk and Control

The Council is responsible for ensuring that it has a sound system of governance (incorporating the system of internal control).

The Head of Audit is required to provide an independent opinion on the overall adequacy of the effectiveness of the Council's governance, risk and control framework. Their Annual Report and Opinion has been considered and any significant issues incorporated as a result.

From the work undertaken during 2018/19, reasonable assurance can be provided that there is generally a sound system of internal control, designed to meet the Council's objectives and that controls are applied consistently. Where weaknesses are identified, i.e. Limited Assurance reports and Priority One recommendations are made; these are tracked by the Corporate Leadership Team and the Audit Sub Committee until implemented or discharged.

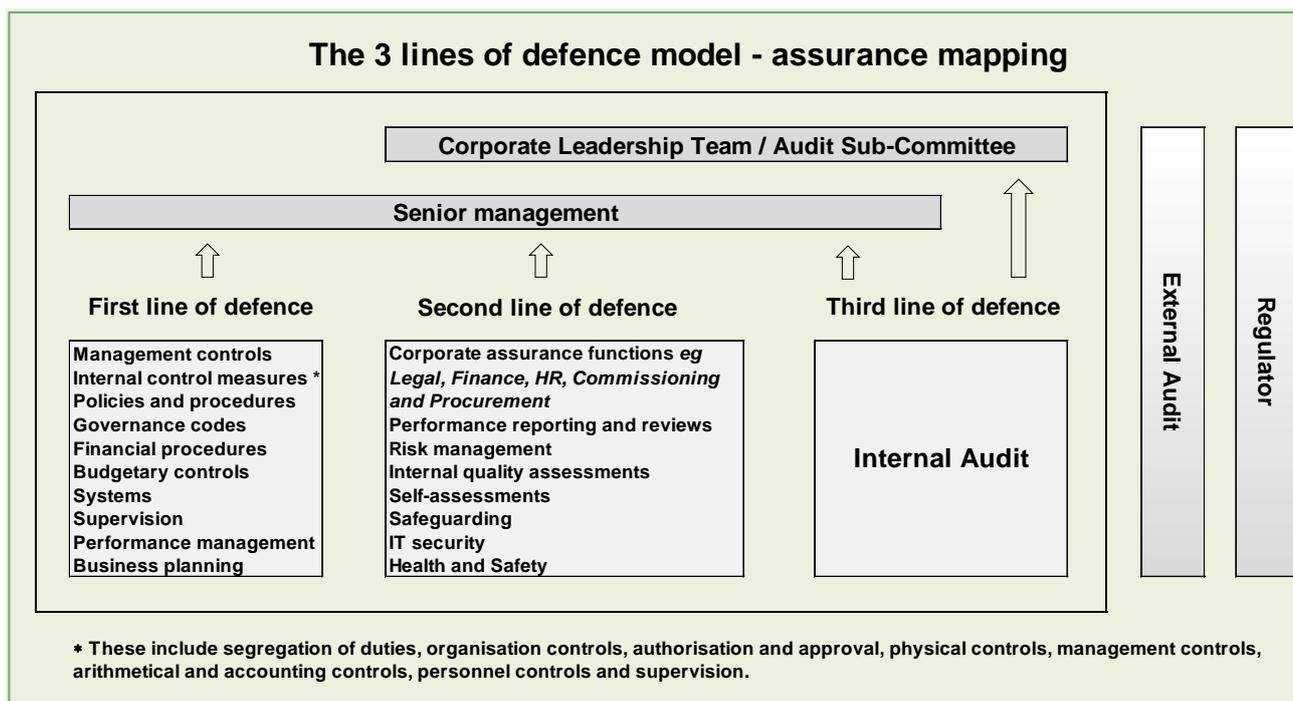
## 7. Our Strategic Risks

The Accounts and Audit Regulations require the Council to undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account the Public Sector Internal Auditing Standards (PSIAS) or guidance. Internal audit is a key component of corporate governance within the Council. The three lines of defence model, as detailed below, provides a simple framework for understanding the role of internal audit in the overall risk management and internal control processes of an organisation.

- ▶ First line – operational management controls
- ▶ Second line – monitoring controls, e.g. the policy or system owner / sponsor
- ▶ Third line – independent assurance

The Council's third line of defence includes Internal Audit, who should provide independent assurance to senior management and the Audit Sub-Committee on how effectively the first and second lines of defence have been operating.

**Figure 2 – 3 Lines of Defence Model**



Risk management is an important element of the system of internal control at Bromley Council. It is based on a process designed to identify, prioritise and control the risks to achieving Bromley’s policies, aims and objectives.

The Corporate Risk Register is a key document in the Council’s approach to risk management; it captures the key strategic risks to the delivery of the corporate objectives as set out in the ‘Building a Better Bromley’ vision. It also provides a context through which high level risks are identified and is used to inform decision making about business planning and service delivery. Chief Officers assume the lead role for Strategic Risks affecting their own service areas with the Corporate Risk Register reviewed at least annually. The Corporate Risk Management Group takes the lead in championing and co-ordinating the Council’s approach to risk management, and ensures that effective risk management processes are fully embedded.

The current Corporate Risk Register can be viewed via following the link

[Corporate Risk Register](#)

## 8. Looking Back on 2017/18

Governance Issue	Action	Progress
<p><b>Finance</b> Capacity to make further budget savings and maintain frontline services. The Council has set a balanced budget for 2018/19 without a detrimental impact on key services. There are savings/income generating options required for 2019/20. However, there are significant challenges for 2020/21 and beyond</p> <p><b>(Director of Finance)</b></p>	<p>Work is ongoing to explore options to address the future years' budget gap through the four year forward planning arrangements.</p> <p>Draft 2018/19 budget and update on Council's financial strategy 2019/20 to 2021/22 report to Executive on 10<sup>th</sup> January 2018 identified the 'One Council' approach.</p> <p><a href="#">Draft 2018/19 Budget and update on Council's Financial Strategy 2019/20 to 2021/22</a></p>	<p>Draft 2019/20 budget and update on Council's financial strategy 2020/21 to 2022/23 report to Executive on 16<sup>th</sup> January 2019 identified the 'One Council' approach and new arrangements for a Transformational Review and Core Statutory Minimum Requirements review to explore further budget choices.</p> <p>Work is ongoing to explore options to address the future year's budget gap through the four year forward planning arrangements.</p> <p><a href="#">Draft 2019/20 Budget and update on Council's Financial Strategy 2020/21 to 2022/23</a></p>
<p><b>Contract Management</b> Contract issues have been identified across the organisation in the last two years which have identified the need for strengthened control and management oversight</p> <p><b>(Director of Commissioning)</b></p>	<p><b>Contract Database</b> Authorisation system for tendering/change control</p> <p><b>Document Management System</b> Holds all contracts electronically and also Minutes of meetings, Change Control Notices (CCN), Waivers</p> <p><b>Training</b> Has been identified as a mandatory requirement for 'commissioners of services'. It consists of four modules (3 hours per module) with compulsory attendance on all four to complete the course.</p> <ul style="list-style-type: none"> <li>• Module 1 – Commissioning</li> <li>• Module 2 – Contracting process, engaging with the market (procurement)</li> <li>• Module 3 – Tender &amp; evaluation process</li> <li>• Module 4 – Award (Governance)</li> </ul> <p><b>Restructuring of the Commissioning Team</b> To improve Governance and Quality Assurance</p>	<p><b>Contract Database</b> Manual authorisation system updated with templates and guidance available. Monitoring of the authorisation process through the Commissioning Board. Managing the authorisation process through the Database is in development with expected roll out in early 2019.</p> <p><b>Document Management System</b> The Database is fully in place and embedded through the organisation. Regular data quality checks and follow up actions are in place.</p> <p><b>Training</b> The first suite of training has been completed (now five modules). Sessions are being repeated in the first half of 2019.</p> <p><b>Restructuring of the Commissioning Team</b> Restructure carried out. Structure to be reviewed in context of Transformation agenda.</p>
<p><b>Performance Management</b> Further work is required to ensure a comprehensive understanding of the strengths and weaknesses of services provided; effective use of</p>	<p>We will be launching an Adults Performance Framework during 2018/19 to compliment the new Children's Performance Management Framework launched in 2017/18. The Council will also be improving performance management</p>	<p>The Adults Performance Framework was launched in June 2018. Implemented through a phased approach, there are ongoing improvements to management oversight.</p>

<p>performance management information and robust quality assurance arrangements across the Council, building on the work undertaken in Children's Services</p> <p><b>(Assistant Director, Strategy, Performance and Business Support)</b></p>	<p>arrangements more broadly across the Council.</p> <p><a href="#">Performance Reporting - Children's Services - covering report</a></p> <p><a href="#">Performance Index</a></p>	<p><a href="#">Performance Management Framework - Adults Services</a></p> <p>In regards to the Children's Performance Management Framework it is noteworthy that the Ofsted inspection in December 2018 highlighted the following:- 'Performance Information has substantially improved since the last inspection and it can now be relied on to help leaders and managers to identify and understand important areas of risk and to prioritise actions. Senior Leaders, including the Chief Executive and Lead Member, have a clear understanding of frontline practice and they interrogate performance information effectively in order to continue to improve. The use of performance information is embedded throughout Children's Services and is accessible to all managers. Improved accountability means that there is sharp analysis and challenge ensuring that issues are tackled as they arise'.</p>
<p><b>Code of Corporate Governance</b> The Council's Code of Corporate Governance has not been updated to reflect the 2016 CIPFA /Solace guidance</p> <p><b>(Director of Corporate Services and Monitoring Officer)</b></p>	<p>A review of the Code will be undertaken to ensure that it reflects recommended practice</p>	<p>A draft code has been produced reflecting the CIPFA/Solace guidance. This will accompany the Annual Governance Statement through the Audit Sub-Committee, General Purposes and Licensing Committee approval process.</p>
<p><b>General Data Protection Regulations (GDPR)</b> Significant changes were required to ensure that the Council is compliant with the General Data Protection Regulations 2016 (GDPR) when introduced on the 25<sup>th</sup> May 2018.</p> <p><b>(Director of Corporate Services)</b></p>	<p>Following an independent review which provided a data protection compliance review and initial gap analysis, a project plan was created with actionable tasks for working towards GDPR compliance. Additional staff support and investment have been secured. The 25<sup>th</sup> May 2018 was not a finish line and work is continuing on the project plan.</p> <p><a href="#">GDPR Regulations Executive Report 6<sup>th</sup> December 2017</a></p>	<p>Work was undertaken and prioritised in terms of risk to ensure that the Council met and continues to meet its data protection obligations. Risk impact assessments were conducted to ensure that Council processes are actioned giving consideration to adequate technical and organisational measures. Significant structures have been put in place to ensure the organic inclusion of privacy by design and by default that ensures robustly embedded in security. The evolution of this work is the delivery of the progressive Information Management strategy with work currently being carried</p>

		out to implement and transition it into operation throughout the Council to support the IT Transformation project.
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[Zurich Information Governance Health Check Report November 2018](#)

To the best of our knowledge, the governance arrangements as defined above, have been operating effectively during the year and remain fit for purpose.

We propose to take steps over the coming year to address the Significant Governance Issue defined on pages 3 and 4 to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

Signed.....

Signed.....

Chief Executive

Leader of the Council

Date.....

Date.....

## Appendix 1 – Links to Documents

Page 2	<b>Building a Better Bromley (2016-2018)</b>
<a href="http://www.bromley.gov.uk/downloads/file/2005/building_a_better_bromley">http://www.bromley.gov.uk/downloads/file/2005/building_a_better_bromley</a>	
Page 3	<b>Draft 2019/20 Budget and Update on Council's Financial Strategy 2020/21 to 2022/23</b>
<a href="https://cds.bromley.gov.uk/documents/s50066150/Executive%20160119%20Draft%202019-20%20Budget%20Report%20Final%20Version.pdf">https://cds.bromley.gov.uk/documents/s50066150/Executive%20160119%20Draft%202019-20%20Budget%20Report%20Final%20Version.pdf</a>	
Page 9	<b>Adult Care and Health Services Portfolio Plan 2018/22</b>
<a href="https://www.bromley.gov.uk/downloads/file/1741/care_services_portfolio_plan">https://www.bromley.gov.uk/downloads/file/1741/care_services_portfolio_plan</a>	
Page 9	<b>Children Education and Families Portfolio Plan 2018/22</b>
<a href="https://www.bromley.gov.uk/downloads/file/1796/education_children_and_families_portfolio_plan">https://www.bromley.gov.uk/downloads/file/1796/education_children_and_families_portfolio_plan</a>	
Page 9	<b>Environment and Community Services Portfolio Plan 2018/21</b>
<a href="https://cds.bromley.gov.uk/documents/s50061598/Appendix%201%20Environment%20Portfolio%20Plan.pdf">https://cds.bromley.gov.uk/documents/s50061598/Appendix%201%20Environment%20Portfolio%20Plan.pdf</a>	
Page 9	<b>Public Protection and Enforcement Portfolio Plan 2018/19</b>
<a href="https://cds.bromley.gov.uk/documents/s50061439/appendix%201%20draft%20PPE%20PP.pdf">https://cds.bromley.gov.uk/documents/s50061439/appendix%201%20draft%20PPE%20PP.pdf</a>	
Page 9	<b>Renewal, Recreation and Housing Portfolio Plan 2018/19</b>
<a href="https://cds.bromley.gov.uk/documents/s50061284/Appendix%201%20for%20Renewal%20Recreation%20and%20Housing%20Portfolio%20Plan.pdf">https://cds.bromley.gov.uk/documents/s50061284/Appendix%201%20for%20Renewal%20Recreation%20and%20Housing%20Portfolio%20Plan.pdf</a>	
Page 9	<b>Adult, Care and Health Portfolio Plan 2018/22 – Quarter Two update covering report (November 2018)</b>
<a href="https://cds.bromley.gov.uk/documents/s50064768/Adult%20Care%20and%20Health%20Portfolio%20Plan%202018-2022%20Update%20-%20Quarter%202%20201819.pdf">https://cds.bromley.gov.uk/documents/s50064768/Adult%20Care%20and%20Health%20Portfolio%20Plan%202018-2022%20Update%20-%20Quarter%202%20201819.pdf</a>	
Page 9	<b>Adult, Care and Health Portfolio Plan 2018/22 – Quarter Two update on progress (November 2018)</b>

<https://cds.bromley.gov.uk/documents/s50064769/App.%201%20to%20Adult%20Care%20and%20Health%20Portfolio%20Plan%202018-2022%20Update%20-%20Quarter%202%20201819.pdf>

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**Education, Children and Families Portfolio Plan 2018/22 – Quarter Two update covering report (October 2018)**

<https://cds.bromley.gov.uk/mgConvert2PDF.aspx?ID=50063955&ISATT=1#search=%22portfolio%20plan%2022>

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**Education, Children and Families Portfolio Plan 2018/22 – Quarter Two update on progress (October 2018)**

<https://cds.bromley.gov.uk/mgConvert2PDF.aspx?ID=50063956&ISATT=1#search=%22portfolio%20plan%2022>

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**Renewal, Recreation and Housing Portfolio Plan 2018/19 - Quarter Two update covering report (January 2019)**

<https://cds.bromley.gov.uk/documents/s50065860/Renewal%20Recreation%20and%20Housing%20Portfolio%20Plan%20-%20Quarter%20Two%20UpdatePART%201%20REPORT%20TEMPLATE.pdf>

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**Renewal, Recreation and Housing Portfolio Plan 2018/19 - Quarter Two update on progress (January 2019)**

<https://cds.bromley.gov.uk/documents/s50065861/Enc.%201%20for%20Renewal%20Recreation%20and%20Housing%20Portfolio%20Plan%20-%20Quarter%20Two%20Update.pdf>

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**Public Protection and Enforcement Performance Overview 2018/19 (January 2019)**

[https://cds.bromley.gov.uk/documents/s50066154/Copy%20of%2019.01.30%20PPE%20Portfolio\\_RAG\\_Report%202018\\_vFINAL\\_21.01.19.pdf?CT=2](https://cds.bromley.gov.uk/documents/s50066154/Copy%20of%2019.01.30%20PPE%20Portfolio_RAG_Report%202018_vFINAL_21.01.19.pdf?CT=2)

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**Environment and Community Services Performance Overview 2018/19 (January 2019)**

<https://cds.bromley.gov.uk/documents/s50066260/ECS%20Performance%20Monitoring%20201819.pdf?CT=2>

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**Draft 2019/20 Budget and Update on Council's Financial Strategy 2020/21 to 2022/23**

<https://cds.bromley.gov.uk/documents/s50066150/Executive%20160119%20Draft%202019-20%20Budget%20Report%20Final%20Version.pdf>

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**Draft 2019/20 Budget and Update on Council's Financial Strategy 2020/21 to 2022/23**

<https://cds.bromley.gov.uk/documents/s50066150/Executive%20160119%20Draft%202019-20%20Budget%20Report%20Final%20Version.pdf>

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**Anti-Fraud and Corruption Strategy**

<https://cds.bromley.gov.uk/documents/s50067028/Appendix%20C-Update%20to%20Anti%20Fraud%20Corruption%20PolicyWhistleblowingBriberyMoney%20Laundering%20Policies.pdf>

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**Monitoring Officer's General Report 22<sup>nd</sup> January 2019**

<https://cds.bromley.gov.uk/documents/s50065897/MONITORING%20OFFICERS%20GENERAL%20REPORT.pdf>

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**Audit Sub Committee Meetings (Agendas, Papers, Minutes)**

<http://cds.bromley.gov.uk/ieListMeetings.aspx?CId=135&Year=0>

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**Ofsted – Inspection of Children's Social Care Services (19<sup>th</sup> – 30<sup>th</sup> November 2019) – Report**

<https://reports.ofsted.gov.uk/provider/44/305>

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**Ofsted – Inspection of Children's Social Care Services (19<sup>th</sup> – 30<sup>th</sup> November 2019) – Press Release 7<sup>th</sup> January 2019**

[https://www.bromley.gov.uk/press/article/1466/bromley\\_children\\_s\\_services\\_leap\\_to\\_good\\_with\\_outstanding\\_leadership](https://www.bromley.gov.uk/press/article/1466/bromley_children_s_services_leap_to_good_with_outstanding_leadership)

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**Ofsted – Inspection of Children's Social Care Services (19<sup>th</sup> – 30<sup>th</sup> November 2018) – Press Release 17<sup>th</sup> January 2019**

[https://www.bromley.gov.uk/press/article/1467/outstanding\\_leadership\\_and\\_good\\_overall\\_ofsted\\_judgements\\_brought\\_about\\_by\\_fundamental\\_shift\\_in\\_approach\\_to\\_children\\_s\\_services](https://www.bromley.gov.uk/press/article/1467/outstanding_leadership_and_good_overall_ofsted_judgements_brought_about_by_fundamental_shift_in_approach_to_children_s_services)

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**Care Quality Commission – Review of Reablement (2<sup>nd</sup> May 2018) - Report**

<https://www.cqc.org.uk/location/1-176333932>

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**Ofsted Inspection of Further Education and Skills. (15<sup>th</sup> – 18<sup>th</sup> January 2019)**

<https://cds.bromley.gov.uk/documents/s50067494/Final%20Ofsted%20report%20-%20Bromley%20Adult%20Education%20January%202019.pdf>

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**Ofsted Inspection of Further Education and Skills (15<sup>th</sup> – 18<sup>th</sup> January 2019) – Press Release 8<sup>th</sup> March 2019**

[https://www.bromley.gov.uk/press/article/1487/bromley\\_adult\\_education\\_gets\\_good\\_marks\\_from\\_ofsted](https://www.bromley.gov.uk/press/article/1487/bromley_adult_education_gets_good_marks_from_ofsted)

<b>Page 16</b>	<b>Care Quality Commission – Review of Shared Lives (24<sup>th</sup> January 2019)</b>
<a href="https://www.cqc.org.uk/sites/default/files/new_reports/INS2-2838196510.pdf">https://www.cqc.org.uk/sites/default/files/new_reports/INS2-2838196510.pdf</a>	
<b>Page 17</b>	<b>Corporate Risk Register</b>
<a href="https://cds.bromley.gov.uk/documents/s50064510/Appendix%20A2%20-%20Corporate%20Risk%20Register.pdf?CT=2">https://cds.bromley.gov.uk/documents/s50064510/Appendix%20A2%20-%20Corporate%20Risk%20Register.pdf?CT=2</a>	
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<b>Page 19</b>	<b>Performance Reporting – Children's Services – Covering Report</b>
<a href="http://cds.bromley.gov.uk/documents/s50059461/Performance%20Reporting%20-%20Childrens%20Services.pdf">http://cds.bromley.gov.uk/documents/s50059461/Performance%20Reporting%20-%20Childrens%20Services.pdf</a>	
<b>Page 19</b>	<b>Performance Reporting – Children's Services – Performance Index</b>
<a href="http://cds.bromley.gov.uk/documents/s50059462/App.%20to%20Performance%20Reporting%20-%20Childrens%20Services.pdf">http://cds.bromley.gov.uk/documents/s50059462/App.%20to%20Performance%20Reporting%20-%20Childrens%20Services.pdf</a>	
<b>Page 19</b>	<b>Performance Management Framework – Adults Services</b>
<a href="https://cds.bromley.gov.uk/documents/s50061329/Performance%20Management%20Framework%20-%20Adults%20Services.pdf">https://cds.bromley.gov.uk/documents/s50061329/Performance%20Management%20Framework%20-%20Adults%20Services.pdf</a>	
<b>Page 19</b>	<b>GDPR Regulations Executive Report 6<sup>th</sup> December 2017</b>
<a href="http://cds.bromley.gov.uk/documents/b50011952/10.%20THE%20GENERAL%20DATA%20PROTECTION%20REGULATIONS%202016%20Wednesday%2006-Dec-2017%2019.00%20Executive.pdf?T=9">http://cds.bromley.gov.uk/documents/b50011952/10.%20THE%20GENERAL%20DATA%20PROTECTION%20REGULATIONS%202016%20Wednesday%2006-Dec-2017%2019.00%20Executive.pdf?T=9</a>	
<b>Page 20</b>	<b>Zurich Information Governance Health Check Report</b>
<a href="https://cds.bromley.gov.uk/documents/s50067026/Appendix%20A-Zurich%20Information%20Governance%20Report.pdf">https://cds.bromley.gov.uk/documents/s50067026/Appendix%20A-Zurich%20Information%20Governance%20Report.pdf</a>	