

ANNUAL GOVERNANCE STATEMENT 2016/2017/2018**Scope of Responsibility**

1. The City of London Corporation is a diverse organisation with three main aims: to support and promote the City as the world leader in international finance and business services; to provide modern, efficient and high quality local services, including policing, within the Square Mile for workers, residents and visitors; and to provide valued services, such as education, employment, culture and leisure to London and the nation. Its unique franchise arrangements support the achievement of these aims.
2. Although this statement has been prepared to reflect the City of London Corporation in its capacity as a local authority and a police authority, the governance arrangements are applied equally to its other funds – City's Cash and Bridge House Estates.
3. The City of London Corporation ("the City Corporation") is responsible for ensuring that its business is conducted in accordance with the law and proper standards; that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively; and that arrangements are made to secure continuous improvement in the way its functions are operated.
4. In discharging this overall responsibility, the City Corporation is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, which includes arrangements for the management of risk.
5. The City Corporation has approved and adopted a code of corporate governance which is consistent with the principles of the CIPFA/SOLACE ¹Framework *Delivering Good Governance in Local Government*. A copy of the code is on the City Corporation's website at www.cityoflondon.gov.uk. This statement explains how the City Corporation has complied with the code and also meets the requirements of regulation 6(1) of the Accounts and Audit (England) Regulations 2015, which requires all relevant bodies to prepare an annual governance statement.

The Purpose of the Governance Framework

6. The governance framework comprises the systems and processes by which the City Corporation is directed and controlled and its activities through which it accounts to, engages with and leads its communities. It enables the City to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.
7. The system of internal control is a significant part of that framework and is designed to manage all risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable rather than absolute assurance of effectiveness. The City Corporation's system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the City's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them economically, efficiently, and effectively and economically.
8. The governance framework has been in place at the City Corporation for the year ended 31 March 2018 and up to the date of approval of the statement of accounts.

Key Elements of the Governance FrameworkCode of Corporate Governance

¹ CIPFA is the Chartered Institute of Public Finance and Accountancy
SOLACE is the Society of Local Authority Chief Executives

9. The principles of good governance are embedded within a comprehensive published Code of Corporate Governance. This code covers both the local authority and police authority roles, and links together a framework of policies and procedures, including:
 - Standing Orders, which govern the conduct of the City Corporation's affairs, particularly the operation of Committees and the relationship between Members and officers;
 - Financial Regulations, which lay down rules that aim to ensure the proper management and safeguarding of the City Corporation's financial and other resources;
 - Terms of reference for each Committee;
 - A Scheme of Delegations, which defines the responsibility for decision-making and the exercise of authority;
 - A Members' Code of Conduct, which defines standards of personal behaviour;
 - A Standards Committee whose role is to promote high standards of member behaviour and to deal with complaints made against Members, and register of interests, gifts and hospitality;
 - A Code of Conduct for employees;
 - The Corporate Plan 2015-19;
 - A corporate complaints procedure, operated through the Town Clerk's Department, with a separate procedure in the Department of Community and Children's Services, to comply with the relevant regulations, and a separate complaints process in respect of complaints about the City of London Police;
 - A corporate Project Toolkit and other detailed guidance for officers, including procedures and manuals for business-business-critical systems;
 - An anti-fraud and corruption strategy, including: anti-bribery arrangements; a social housing tenancy fraud, anti-fraud and prosecution policy; and a whistleblowing policy;
 - A Risk Management Strategy;
 - Job and person specifications for senior elected Members and the Court of Aldermen; and
 - A protocol for Member/officer relations.
10. The City Corporation's main ~~decision~~-making body is the Court of Common Council, which brings together all of ~~the City's~~ elected members. Members sit on a variety of committees which manage the organisation's different functions, and report to the Court of Common Council on progress and issues as appropriate. The Town Clerk and Chief Executive is the City Corporation's statutory head of paid service, and chairs the Chief Officers' Group, and the Summit Group, which is the primary officer decision-making body. In 2015/16 a new officer governance framework was introduced, ~~now~~ comprising four Chief Officer Strategic Steering Groups, reporting to the Summit Group, although, following the substantive development of the new Corporate Plan 2018-23, three of these groups have ceased to meet. The Comptroller and City Solicitor discharges the role of monitoring officer under the Local Government and Housing Act 1989.
11. The Court of Common Council is defined as the police authority for the City of London Police area in accordance with the provisions of the City of London Police Act 1839 and the Police Act 1996.
12. The role of the police authority is to ensure that the City of London Police runs an effective and efficient service by holding the Commissioner to account; to ensure value for money in the way the police is run; and set policing priorities taking into account the views of the community. These, and other key duties, are specifically delegated to the Police Committee. The Police Committee has the following Sub Committees and Boards to provide enhanced oversight in specific areas of police work:

- The Professional Standards and Integrity Sub Committee has responsibility for providing detailed oversight over professional standards and integrity within the Force, and examines the casework of every single complaint recorded by the Force;
 - The Performance and Resource Management Sub Committee monitors performance against the Policing Plan and oversees management of risk, human and financial resources; ~~and~~
 - The Economic Crime Board considers matters relating to the Force's national responsibilities for economic crime and fraud investigation; ~~and~~
 - The Police Pensions Board assists the City of London Police in securing compliance with pension scheme regulations and other legislation relating to the governance and administration of the scheme.
13. Under the Localism Act 2011, the City Corporation is under a duty to promote and maintain high standards of conduct by Members and co-opted Members. In particular, the Court of Common Council must adopt and publicise a code dealing with the conduct that is expected of Members when they are acting in that capacity, and have in place a mechanism for the making and investigation of complaints. The Court approved ~~the current~~ revised Code of Conduct in ~~October 2014~~ March 2018, following a review ~~by the Standards Working Party~~ by the Standards Committee.
 14. The City Corporation has appropriate arrangements in place under which written allegations of a breach of the Member Code of Conduct can be investigated and decisions on those allegations taken. ~~The Standards Committee has approved a~~ Complaints Procedure is in place and following a review a revised model will come into force in the 2018/19 municipal year. A Dispensations Sub Committee exists for the purposes of considering requests from Members for a dispensation to speak or vote on certain matters (where they have a disclosable pecuniary interest and are otherwise prevented from participation) being considered at Committee meetings. Elected and co-opted Members are invited to review and update their Member Declarations on an annual basis (although there is no statutory requirement to do so).
 15. Under ~~Section~~ Section 28 of the Localism Act, the City Corporation is required to appoint at least one Independent Person to support the ~~new~~ standards arrangements. ~~In June 2012, the Court of Common Council gave support to~~ has made three appointments to the position of Independent Person, ~~and also agreed a revised constitution and terms of reference for the Standards Committee, to be adopted under section 28 of the Act.~~
 16. The Localism Act also requires the City Corporation to prepare and publish a Pay Policy Statement each year, setting out its approach to pay for the most senior and junior members of staff. The Pay Policy Statement for ~~2016~~ 2017/17-18 was agreed by the Court of Common Council in March ~~2016~~ 2017 and published on the City Corporation's website.
 17. To assist in meeting the City Corporation's obligations under the Bribery Act 2010, officers with decision-making powers in relation to higher risk activities are required to make an annual declaration to confirm that they have met the requirements relating to potential conflicts of interest, as set out in the Employee Code of Conduct, and to confirm that they have not engaged in any conduct which might give rise to an offence under the Act.
 18. As a result of the Protection of Freedoms Act 2011-12, revisions were agreed to the City Corporation's policy and procedures in respect of the Regulation of Investigatory Powers Act 2000 (RIPA), which regulates surveillance carried out by public authorities in the conduct of their business. A report ~~is was~~ made six monthly in September 2017 to the Policy and Resources Committee on the City Corporation's use of RIPA powers. In September 2015, the Office of the Surveillance Commissioners conducted an inspection of the City Corporation's arrangements. The inspector concluded that the City Corporation is keen to set and maintain standards and has a sound RIPA structure, with good policies and procedures.

Standards Committee

19. The Standards Committee oversees the conduct of Members in all areas of the City of London Corporation's activities be it local authority, police authority or non-local authority functions. Its main responsibility is to promote and maintain high standards of conduct by elected Members and Members co-opted on to City of London Committees.

20. Its functions include:

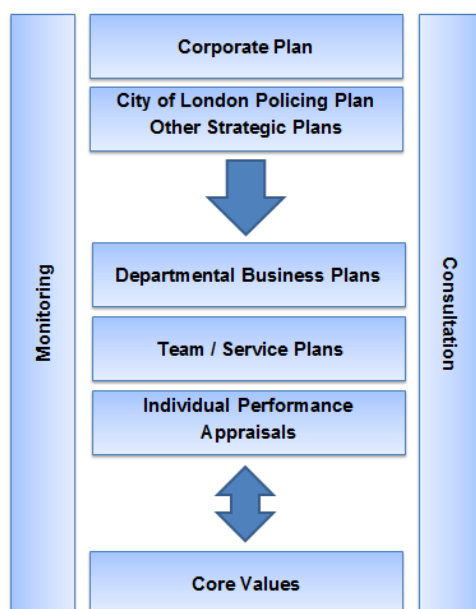
- monitoring and regularly reviewing the operation of the Code of Conduct for Members and related procedures;
- considering any alleged breaches of the Code;
- monitoring Members' declarations to ensure compliance with both the statutory and local registration requirements;
- regularly reviewing the complaints procedure and dispensations arrangements;³ and
- submitting an annual report to the Court of Common Council.

21. During 2016/17, the Standards Committee commissioned an independent, broadly-based review of the arrangements in place for addressing matters connected with the conduct of Members (including co-opted Members) under the Localism Act 2011, with particular focus on the Complaints Procedure (relating to alleged breaches of the Members' Code of Conduct). A Member Working Party ~~has been~~ formed to review the resulting report and how the recommendations in the report might be progressed and implemented. The Working Party's recommendations were considered and adopted by the Court of Common Council, with changes due to be implemented during the 2018/19 municipal year. The Committee undertakes an annual review of the Protocol on Member/Officer Relations. In October 2016, the Committee undertook its annual review of the Protocol on Member/Officer Relations, and approved changes including the inclusion of specific reference to equality, diversity and inclusion, and appending the Protocol to both the Employee Code of Conduct and the guidance to Members on the Members' Code of Conduct. No Five allegations of breaches of the Members' Code of Conduct were made to the Committee during ~~2016~~2017/18.

21-22. Following the March 2017 Ward elections, 26 new Members were elected to the Court of Common Council. A comprehensive package of learning and development was offered to all new and returning Members and included briefing sessions on corporate planning, the Member Code of Conduct and the Member/Officer Protocol, as well as other aspects of the governance framework i.e. how decisions are taken, Standing Orders and financial regulations.

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Business Strategy and Planning Process



22-23. The City Corporation has a clear hierarchy of plans, setting out its ambitions and priorities:

- The Corporate Plan, 2015-19, shows how the City Corporation will fulfil its role as a provider of services both inside and outside of the City boundaries. The ~~current~~ Corporate Plan ~~(2015-19)~~ includes a statement of the City's Vision, Strategic Aims, Key Policy Priorities, Core Values and Behaviours. It will however have since been replaced by a new Corporate Plan covering the period 2018-23, to be which was approved by Court of Common Council on 8th March 2018 and introduced from 1st April 2018.
- The City of London Policing Plan details the policing priorities and shows how these will be delivered over the coming year. It also contains all the measures and targets against which the Police Committee hold the City of London Police to account.
- Other corporate plans and strategies are mentioned elsewhere in this document.

23-24. Plans and strategies are informed by a range of consultation arrangements, such as City-wide residents' meetings, representative user groups and surveys of stakeholders. The City Corporation has a unique franchise, giving businesses (our key constituency) a direct say in the running of the City, and a range of engagement activities, including through the Lord Mayor, Chairman of Policy and Resources Committee and the Economic Development Office. An annual consultation meeting is held for business rates and council tax payers.

24-25. The Health and Social Care Act 2012 transferred responsibility for health improvement of local populations to local authorities in England, with effect from 1st April 2013. The new duties included the establishment of a Health and Wellbeing Board, which provides collective leadership to improve health and wellbeing for the local area.

Information Management Strategy

25-26. The Information Management Strategy (approved October 2009) sets out the headline approach to information management in the City Corporation. It summarises the current position, gives a vision of where we want to be and proposes a set of actions to start us on the path to that vision. The Strategy defines our approach to the other key elements for

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information management, in particular data security and data sharing. The Information Management Strategy is being updated and refreshed with a new Information Management Strategy to be published in July 2018 alongside recommendations for a new Information Management Operating Model.

27. Overall responsibility for Information Management Governance is vested in the Information Technology (IT) Sub Committee. The Information Management Governance Steering Group reports to the Strategic Resources Group and the IT Steering Group, both chaired by the Chamberlain. Both groups report to the Summit Group and the IT Sub Committee. The Comptroller and City Solicitor is now the Senior Information Risk Owner (SIRO) and work continues to identify Information Asset Owners (IAO) within departments and build an information asset register.

26-28. The Corporation has undertaken a thorough review and update of its policies and procedures in preparation for the coming into force of the General Data Protection Regulation (GDPR) on 25th May 2018, together with a programme of training for officers and members.

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Financial Management Arrangements

27-29. The Chamberlain of London is the officer with statutory responsibility for the proper administration of the City's financial affairs. In 2010 CIPFA issued a "*Statement on the Role of the Chief Financial Officer in Local Government*"² which ~~codifies~~ defines the key responsibilities of this role and sets out how the requirements of legislation and professional standards should be met. The City's financial management arrangements conform to the governance requirements of the Statement. The Chamberlain also fulfils the role of Treasurer of the Police Authority.

28-30. The system of internal control is based on a framework of regular management information, financial regulations, administrative procedures (including segregation of duties), management supervision, a system of delegation and accountability, and independent scrutiny. In particular the system includes:

- a rolling ~~in-in~~ depth survey of the City Corporation's forecast position over a ~~five-five~~-year period;
- comprehensive budget setting processes;
- monthly, quarterly and annual financial reports ~~which-that~~ indicate performance against budgets and forecasts;
- access by all departmental and central finance staff to systems providing a suite of enquiries and reports to facilitate effective financial management on an ongoing basis;
- ongoing contact and communication between central finance officers and departmental finance officers;
- clearly defined capital expenditure guidelines;
- formal project management disciplines;
- the provision of high quality advice across the organisation;
- an internal audit service combining in-house staff with external knowledge and expertise;
- insuring against specific risks;
- scrutiny by Members, OFSTED, CQC, HMIC, other inspectorates, External Audit and other stakeholders³; and
- requests for Members and Chief Officers to disclose related party transactions including instances where their close family have completed transactions with the City ~~of London~~ Corporation.

² Updated in 2016

- ~~29-31.~~ The City Corporation has a long-standing and in-built culture of maximising returns from its resources and seeking value for money. It assesses the scope for improvements in efficiency /value for money at a corporate and service level by a variety of means, including improvement priorities set by the Policy and Resources Committee through the annual resource allocation process, and internal examination and review by the Efficiency and Performance Sub Committee.
- ~~30-32.~~ The Efficiency and Performance Sub Committee also has responsibility for monitoring and oversight of the delivery of the service based review savings and increased income, and the cross-cutting efficiency reviews, and continues to challenge the achievement of value for money, helping to embed further a value for money culture within the City Corporation's business and planning processes.
- ~~33.~~ Following approval by the Court of Common Council in October 2016, an Efficiency and Sustainability Plan for the City Corporation was submitted to and accepted by the Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government). This provided a degree of certainty over central government funding for the period from 2016/17 to 2019/20. It also establishes a framework for continuous efficiency improvement beyond 2017/18 when the current service based review programme will be substantially complete, including a 2% per annum budget reduction target that will deliver sufficient efficiencies across the City Corporation's funds from 2018/19 to sustain these budgets over the medium term and allow for planned investment in services through the Priorities Investment Pot. ~~In addition, further corporate efficiency and effectiveness reviews are planned for when the current cross-cutting programmes are completed.~~
- ~~34.~~ In anticipation of the completion of the service based review programme, a new methodology for identifying cross-cutting efficiencies was piloted in 2017. The pilot for the Chief Officer Peer Review was completed in July 2017 and the methodology was refined for the wider roll out made up of 3 additional groups. Sessions began in October 2017 and the final meetings were completed in March 2018. The focus of these sessions was to discuss how each Chief Officer can make their departments more innovative, collaborative and agile whilst delivering the required 2% per annual budget reductions. These sessions aimed to help Chief Officers develop their business plans to make efficiency savings or generate income to help meet the annual 2% continuous improvement requirements of the Efficiency and Sustainability Plan and achieve better alignment of activities to the outcomes in the Corporate Plan.
- ~~31-35.~~ As part of the Chief Officer Peer Review, Chief Officers have been presenting their outputs of their Peer Reviews, in the form of -plans, to address the 2% budget reductions to Summit Group and then, if recommended by Summit Group, to -Efficiency and Performance Sub-Committee. The outcomesA summary of the Chief Officer Peer Review outputs will be reported to Efficiency and Performance Sub-Committee in quarter 1 of the 2018/19 financial year.
- ~~36.~~ For non-Police services, the local government settlement in autumn ~~2016-2017~~ was challenging but fell within the prudent assumptions included with the City's financial forecast. Agreed actions from a service based review will deliver efficiencies, savings and opportunities for additional income totalling some £11m a year by 2018/19. Subject to there being no significant adverse changes in financial planning assumptions across the period, forecasts indicate a surplus across the period to ~~2020~~2021/24-22, although from 2019/20, the inclusion of funding for the Museum of London and Combined Courts relocation projects will move the fund into a deficit position. However,
- ~~37.~~ ~~the~~The economic outlook and public finances remain uncertain following 'Brexit'~~the EU Referendum and the national election~~ and there is no guarantee that government funding will be not be revised further downwards in later years. The Ministry of Housing, Communities and Local Government is currently consulting on a Fair Funding Review that will recalculate the baseline grant for City Fund from 2020/21. This may also coincide with a move to greater business rates retention nationally, currently under consideration by the Government. The position is being monitored on an ongoing basis.

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~~32-38.~~ The City Corporation is participating in a pilot scheme for business rate devolution during 2018/19 with all 32 London Boroughs and the Greater London Authority, involving the establishment of a business rates pool. The proposal was approved in December 2017. The scheme has a financially neutral starting point but enables any year-on-year growth in rates revenue to be retained within London. Some of this will be used to establish a strategic investment fund and the rest will be shared among participating authorities.

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~~33-39.~~ The City of London Police manages its budget on a ring-fenced basis. The Court of Common Council agreed to increase the Business Rates Premium from April 2016 with the additional income, estimated at £1.6m a year, being allocated to the Police to cover emerging cost pressures relating to security. Nevertheless, the underlying financial position remains challenging with deficits forecast across the period and reserves exhausted during ~~2017/2018/1819. This is despite implementing a challenging savings plan and previous budget reductions.~~

~~34-40.~~ The Force has a forecast deficit in subsequent years arising from increasing demand and the changing nature of policing. The Force is in the process of implementing recommendations following the Deloitte Demand and VfM review which was commissioned by the Commissioner and Chamberlain during 2017/18 to address the underlying budget deficit. Additional support is being provided by the City Corporation for capital investment priorities over the period between 2017/18 and 2022/23 totalling £17.5m plus some further IT and pension costs. ~~has a robust financial strategy in place to balance the budget over the period to 2018/19, which includes provision for a minimum general reserve balance for unforeseen or exceptional operational requirements.~~ The Force and the City Corporation are also investigating areas for greater collaboration, including the development of a Joint Contact and Control Room as part of the Secure City programme.

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~~35-41.~~ The Police Performance and Resource Management Sub Committee's responsibilities include overseeing the Force's resource management in order to maximise the economic, efficient and effective use of resources to deliver its strategic priorities; monitoring government and other external agencies' policies and actions relating to police performance; overseeing the Force's risk management arrangements; and ensuring that the Force delivers value for money. The Sub Committee also receives regular updates on the work of internal audit in relation to the Force.

~~36-42.~~ The Policy and Resources Committee determines the level of the City Corporation's own resources to be made available to finance capital projects on the basis of a recommendation from the Resource Allocation Sub Committee. Ordinarily, such projects are financed from capital rather than revenue resources, and major projects from provisions set aside in financial forecasts.

~~37-43.~~ The City Corporation has a number of procedures in place to ensure that its policies and the principles that underpin them are implemented economically, efficiently and effectively. This framework includes:

- Financial Strategy ~~-~~ This provides a common base for guiding the City Corporation's approach to managing financial resources and includes the pursuit of budget policies that seek to achieve a sustainable level of revenue spending and create headroom for capital investment and policy initiatives;
- Budget policy ~~-~~ The key policy is to balance current expenditure and current income over the medium term. Both blanket pressure and targeted reviews are applied to encourage Chief Officers to continuously seek improved efficiency;
- Annual resource allocation process ~~-~~ This is the framework within which the City Corporation makes judgements on adjustments to resource levels and ensures that these are properly implemented;
- Corporate Property Asset Management Strategy ~~-~~ This aims to ensure that the City Corporation's operational assets are managed effectively, efficiently and sustainably, in support of the organisation's strategic priorities and business needs;

- Capital project evaluation, management and monitoring – The City Corporation has a comprehensive system of controls covering the entire life cycle of capital and major revenue projects; and
- Treasury Management and Investment Strategies – Setting out the arrangements for the management of the City Corporation's investments, cash flows, banking and money market transactions; the effective control of risks associated with those activities; and the pursuit of optimum performance consistent with those risks.

~~38-44.~~ Consideration is given to efficiency during the development and approval stages of all major projects, with expected efficiency gains quantified within reports to Members.

~~39-45.~~ The performance of the City Corporation's financial and property investments ~~are~~ is monitored and benchmarked regularly, both in-house and independently, through experts in the field.

~~40-46.~~ The City Corporation's project management and procurement arrangements provide a consistent approach to project management and co-ordination of the portfolio of projects across the organisation. The Projects Sub Committee meets monthly to ensure that projects align with corporate objectives and strategy, and provide value for money.

Risk Management

~~41-47.~~ In May 2014, the Audit and Risk Management Committee approved a new Risk Management Strategy which set out a new policy statement and a revised framework, which aligns with the key principles of ISO 31000: Risk Management Principles and Guidelines, and BS 31100: Risk Management Code of Practice, and defines clearly the roles and responsibilities of officers, senior management and Members. The Strategy emphasises risk management as a key element within the City's systems of corporate governance and establishes a clear system for the evaluation of risk and escalation of emerging issues to the appropriate scrutiny level. The Strategy assists in ensuring that risk management continues to be integrated by Chief Officers within their business and service planning and aligned to departmental objectives.

~~42-48.~~ The Risk Management Group, consisting of senior managers representing all departments, including the City of London Police, meets twice annually. The group is a considerable driver in promoting the application of consistent, systematic risk management practices across the organisation. Strategic decisions on risk management are made by the Summit Group on a quarterly basis. Oversight of corporate risk is provided by the Chief Officers' Group and the Audit and Risk Management Committee. These arrangements have been strengthened with the establishment of a Chief Officer Risk Management Group. This meets quarterly to review, in depth, the corporate risk register and report their findings to the Summit Group when they consider the quarterly risk update report. In addition to receiving quarterly risk update reports, the Audit and Risk Management Committee has adopted a cycle of regular departmental risk challenge sessions, with Chief Officers and their respective Committee Chairmen, which take place prior to their meetings. The Committee has also introduced the regular reporting of top departmental risks to every Service Committee.

~~43-49.~~ The corporate risk register contains ~~eleven~~ thirteen risks, including two new risks which have been added during the last year.

~~50.~~ During 2016/17 an external review was undertaken of the City's risk management arrangements. ~~The report's key finding was that systems and processes that support the risk management framework had significantly improved over the last two years and six areas that should be considered for improvement were suggested. An improvement plan is now being developed and is currently being implemented.~~

- a. Risk management training was delivered, during the second half of 2017, to the City Corporation's top 120 managers. In addition, there were several departmentally focussed risk management training sessions for other managers and staff. The regular monthly manager and staff business risk management training sessions have been run as part of the corporate training programme.

b. Using the services of an external risk consultancy practice, the City Corporation has developed an understanding of its organisational risk appetite. Work is now in hand to assess its most significant risks against the appetite levels.

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c. To improve the sharing of risk information and encourage co-operation between the various risk disciplines within the City Corporation (Resilience, H&S, IT, City Procurement, Internal Audit, Anti-Fraud, Corporate Performance), a new Risk Specialism group now meets on a quarterly basis.

d. Further, the corporate risk register will be reviewed following the adoption of the new Corporate Plan 2018-23.

~~44. [suggest adding something on the refresh of the corporate risk register in light of / to align with the new Corporate Plan.]~~

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~~45. The external risk management review also provided evidence to support a risk maturity assessment of the City as a strong "working" (level 3 out of 5) based upon the National Performance Model for Risk Management in the Public Services (used by CIPFA/Alarm for benchmarking purposes).~~

Health & Safety and Wellbeing

~~46-51.~~ The Health & Safety at Work etc. Act 1974 ~~(the Act)~~ requires the City as an employer to ensure that it implements systems for the protection of its staff and ~~visitors~~ others affected by its activities. The City's City Corporation health and safety management system is aligned to HSG65, the Health and Safety Executive's guidance document on the essential philosophy of good health and safety. The City's City Corporation systems will remain aligned with this guidance, to ensure that safety becomes part of normal business by applying a practical, sensible and ~~common~~ common-sense approach.

~~47-52.~~ Corporate Risk 09 concerns the City's Health and Safety Management System and its application. Effective health and safety management enables innovation, growth and enhances productivity, as well as helping the City Corporation to achieve its strategic objectives.

~~48-53.~~ Driving is the one of the most hazardous work activities, contributing to far more accidental deaths and serious injuries than all other work-related tasks. The City ~~has~~ Corporation introduced a *Corporate Transport Policy* along with associated procedures and guidance to manage occupational road risk. Embedding of the policy continues, with a focus during 2017 on assuring compliance across the organisation.

~~49-54.~~ There is an established annual inspection and audit programme for property and people health and safety - for example audit, inspections and compliance checks have focused on water hygiene (legionella), fire safety, asbestos management, workplace transport and lone working/preventing violence. These are currently considered to be the City's City Corporation's areas of higher risk profile.

~~50. Like many large organisations the City may become aware of credible risk information through external contact, such as liaison with clients and service users. At present the majority of this type of risk information resides at the departmental level. The Personal Safety Visiting Tool (PSVT) is a new initiative being rolled out in 2017 by Corporate Health and Safety (People). It aims to provide departments' access to a corporate register of issues they and other visiting officers have encountered at various residential properties. The PSVT should enable all necessary departments to appropriately share their data, creating a seamless source of information to aid in the safety of all staff, recognising the interconnectedness of risk.~~

~~55.~~ The Covalent Pentana Risk Management Information System is used to manage significant health and safety risks. Covalent Pentana enables departments to highlight their safety risks as a 'Top X' risk, emphasising any activities with considerable implications that are unmitigated, or where there is a lack of clarity. Significant fire safety support has been provided to several departments, including the Barbican Centre, Department for Community and Children's Services and Mansion House/Central Criminal Court.

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51-56. The CityWell wellbeing strategy is a strong employee brand and has helped embed the wellbeing programme at the City Corporation. The CityWell programme has been re-focused on mental health as the top priority with mandatory training for managers supported by a wider health promotion and wellness programme.

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52-57. The City Corporation has established key performance indicators for health and safety including accident/incident reporting and investigation. The health and safety professionals have supported departments with their more challenging and/or significant health and safety investigations. This has helped to ensure that lessons are learned and are fed back into the development of the health and safety management system.

Business Continuity

53-58. The Civil Contingencies Act 2004 requires the City Corporation, as a Category 1 responder, to maintain plans to ensure that it can continue to exercise its functions in the event of an emergency. The City Corporation is required to train its staff responsible for business continuity, to exercise and test its plans, and to review these plans on a regular basis. Business Continuity Leads retraining is planned for roll-out in 2018/19.

54-59. The City Corporation has an overarching Business Continuity Strategy and Framework and each department has their own business continuity arrangements. Both corporate and departmental arrangements are regularly reviewed to ensure they align with the relevant risk registers and business objectives. Officers from the different departments share best practice and validate their arrangements through the Emergency Planning and Business Continuity Steering Group, which sits on a quarterly basis. New arrangements that seek to increase the resilience of the City Corporation's technology infrastructure have been introduced and technical tests are being carried out to ensure their robustness. These arrangements seek to replace-ensure that the Guildhall can no longer be as a potential single point of failure for the City Corporation's IT provision. The move to a more resilient backbone should enhance the continuity of service for remote workers, and at other sites, even if the Guildhall is affected.

55-60. Business Continuity testing is undertaken periodically by departments, with the intention of testing their ability to cope under pressure. Testing scenarios are based on adverse effects and 'worst case' events which aim to limit 'Business as Usual' operations, and are derived from departmental emergency management and business continuity plans, national and local risk register documentation, previous lessons learned and horizon scanning events. Testing is undertaken in formats including live play exercise, table top / workshop, and seminar/discussion exercises, and is based on objectives which aim to be specific, measurable, achievable, realistic and targeted towards departmental functions. Information is captured throughout testing and fed back to the departments being exercised. Reports are produced and any lessons learned are sought to be implemented.

56-61. Programme management of the City Corporation's business continuity management system (BCMS) lies with the Resilience Planning Team, and all departments play a role in it. In 2014, the City Corporation's resilience arrangements (including its BCMS) were reviewed by peers from other Central London local authorities. This review was part of a regular assurance process linked to the Minimum Standards for London (which set out London's core resilience capabilities). The Team continues its on-going work with the IT service provider Agilisys to ensure robust business continuity plans dovetail between IT functions and critical services.

57-62. The City continues to experience an array of protests and demonstrations, as it is a desirable location for protest groups to maximise publicity both nationally and globally. However, by working with business and emergency service partners to ensure robust Business Continuity and emergency response plans are in place, the City Corporation maintains 'business as usual', and thus its reputation of working with and supporting business and local communities.

Role of Internal Audit

58-63. Internal Audit plays a central role in providing the required assurance on internal controls through its comprehensive risk-based audit programme, with key risk areas being reviewed

annually. This is reinforced by consultation with Chief Officers and departmental heads on perceived risk and by a rigorous follow-up audit and spot checks regime.

~~59-64.~~ The internal audit process is supported, monitored and managed by the Audit and Risk Management Committee in accordance with the Public Sector Internal Audit Standards. An Audit Charter established in 2013 was updated and agreed by the Audit and Risk Management Committee in ~~May-May 2017 and again in March 2018~~⁷. This defines the role of internal audit, and ~~codifies-sets out~~ accountability, reporting lines and relationships that internal audit has with the Audit and Risk Management Committee, Town Clerk and Chief Executive, Chamberlain and Chief Officers.

~~60-65.~~ The Internal Audit Section operates under the requirements of the Public Sector Internal Audit Standards (PSIAS). The City of London's internal audit function was subject to an External Quality Assessment by Mazars LLP in February 2017⁷, and assessed as "generally conforms" to the new standard. A number of recommendations identified during the review are currently being addressed to ensure that the Internal Audit Section fully conforms to the new ~~s~~Standards.

~~61-66.~~ The anti-fraud and investigation function continues to be effective in identifying and investigating allegations of fraud and corruption, with mature processes in place to tackle fraud across the City ~~Corporation's~~ social housing estates; along with conducting a wide range of risk based anti-fraud and awareness activities. The Audit and Risk Management Committee is provided with six-monthly anti-fraud and investigation up-date reports which detail the anti-fraud and investigation activity undertaken by the Anti-Fraud Team and provides progress against the strategic pro-active anti-fraud plan.

Performance Management

~~62-67.~~ The corporate business planning framework sets out the planning cycle with clear linkages between the different levels of policy, strategy, target setting, planning and action (the "Golden Thread").

- All departments are required to produce annual departmental business plans for approval by the relevant service committee(s). These are all clearly linked to the overall Corporate Plan and show key objectives aligned with financial and staffing resources.
- All departmental business plans are reviewed for compliance with the corporate business planning framework, and regular meetings are held between the Corporate Strategy and Performance Team and business planners.
- All departments are required to report regularly to their service committees with progress against their business plan objectives and with financial monitoring information.
- Performance and Development Appraisals are carried out for all staff, using a standard set of core behaviours. The appraisals are used to set individual objectives and targets and to identify learning and development needs that are linked to business needs. Pay progression is linked to performance assessments under the appraisal process.

~~63-68.~~ Performance is communicated to Council Tax and Business Rate payers through the City-wide residents' meetings, the annual business ratepayers' consultation meeting and regular electronic and written publications, including an annual overview of the accounts.

~~64-69.~~ ~~During 2016/17 a review of the existing business planning process was undertaken, as a precursor to a broader~~~~In tandem with the development of the new Corporate Plan 2018-23,~~ ~~approved by the Court of Common Council in March 2018, a new review of corporate and departmental planning and performance management framework has been developed, to be completed rolled out across the City Corporation during 2017/2018/18-19. These will shortly be supported by a new appraisals process and set of corporate behaviours.~~

Audit and Risk Management Committee

~~65-70.~~ The Audit and Risk Management Committee is an enhanced source of scrutiny and assurance over the City ~~Corporation's~~ governance arrangements. It considers and approves

internal and external audit plans, receives reports from the Head of Audit and Risk Management, external audit and other relevant external inspectorates, including HMIC, as to the extent that the City Corporation can rely on its system of internal control. The Committee reviews the financial statements of the City Corporation prior to recommending approval by the Finance Committee and considers the formal reports, letters and recommendations of the City Corporation's external auditors. The Committee also monitors and oversees the City Corporation's Risk Management Strategy. The Committee undertakes a systematic programme of detailed reviews of each of the risks on the City Corporation's Strategie Corporate Risk Register.

~~66-71.~~ During 201~~7~~⁶/~~18~~⁷, the Committee continued its schedule of departmental risk challenge sessions. The Committee reviews the risks and risk management process for each department, on a rota basis, with one or two departments being invited to each meeting. These reviews are attended by the relevant Chairman and Chief Officer, with support and challenge applied so that risks are fully understood, and clear mitigation plans are in place. The Committee has also actively promoted a process for the regular reporting of top departmental risks to Service Committees, to encourage all Members to engage with the management of risk.

~~67-72.~~ The Committee has strongly supported the internal audit function by setting clear performance expectations for Chief Officers in the timely implementation of audit recommendations, as well as ensuring internal audit's independence is fully recognised. It has reviewed the outcome of the Service Based Review of the internal audit function, and is overseeing the adoption of a more efficient approach to the targeting of internal audit resources.

~~68-73.~~ The Committee has supported the management of the Information Security corporate risk, highlighting the mandatory awareness training for all staff, resulting in a significant increase in the percentage of staff fully completing this training.

~~69-74.~~ The Committee has taken a keen interest in cyber-security risks and remains committed to supporting the continuous development of cyber security across the City ~~of London~~ Corporation, including the incorporation into the City Corporation's controls of lessons learned from good practice elsewhere in the private and public sectors.

Review of Effectiveness

~~70-75.~~ The City Corporation has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the internal auditors and managers within the authority who have responsibility for the development and maintenance of the governance environment and also by comments made by the external auditors and other review agencies and inspectorates.

~~74-76.~~ Processes that have applied in maintaining and reviewing the effectiveness of the governance framework include scrutiny primarily by the Policy and Resources, Finance, Police, Audit and Risk Management, Investment, and Standards Committees; and the Resource Allocation, Police Performance and Resource Management, and Efficiency and Performance Sub Committees.

~~72-77.~~ This review of the main elements of the City Corporation's governance framework has not identified any significant issues for reporting to senior management.

Head of Internal Audit's Opinion

~~73-78.~~ The Public Sector Internal Audit Standards require the Head of Internal Audit to deliver an annual internal audit opinion and report that can be used by the City ~~of London~~ Corporation to inform its Annual Governance Statement. The Head of Internal Audit is satisfied that sufficient quantity and coverage of internal audit work and other independent assurance work has been undertaken to allow him to draw a reasonable conclusion as to the adequacy and effectiveness of the City's risk management, control and governance processes. In his opinion,

the City Corporation has adequate and effective systems of internal control in place to manage the achievement of its objectives. In giving this opinion he has noted that assurance can never be absolute and, therefore, only reasonable assurance can be provided that there are no major weaknesses in these processes.

~~74-79.~~ Notwithstanding this overall opinion, internal audit's work identified a number of opportunities for improving controls and procedures, which ~~management has accepted and~~ are documented in each individual audit report. Four areas reviewed in ~~2016~~2017/17-18 resulted in 'red' (limited) assurance opinions. These relate to internal audit reviews undertaken of: ~~the City of London Police use of fuel cards; IT asset management; IT network infrastructure; and IT Wi-fi security and operations~~Members and Officers Declarations of Interests; Open Spaces Repairs and Maintenance; Barbican Centre Retail and Bars and Guildhall School of Music and Drama Catering. All reports and recommendations have been accepted ~~and are being addressed~~ by management ~~and implementation of the recommendations will be verified by internal audit follow up.~~

Future ~~Developments~~Work Programme

~~75-80.~~ The governance framework is constantly evolving due to service and regulatory developments and assessments. Improvement plans have been compiled in response to the reports and assessments summarised above. Controls to manage principal risks are constantly monitored, in particular for services with statutory responsibilities for the safety of vulnerable people. The City Corporation proposes over the coming year to take the following steps to maintain, develop and strengthen the existing governance framework:

- Review the City Corporation's governance arrangements against the requirements of the CIPFA/Solace framework *Delivering Good Governance in Local Government* 2016.
- ~~Develop a~~Roll out the refreshed Corporate Plan, for the period 2018-23, and both develop and begin collecting data against a set of outcome-based measures for the whole City Corporation, that demonstrate impact and progress towards delivering the Plan~~setting out a set of overarching goals for the organisation which will prioritise activity over the medium term and thereby achieve more in the context of reducing budgets.~~
- ~~Review the framework for departmental business planning and performance management to ensure that all work carried out contributes to delivery of the outcomes in the refreshed Corporate Plan.~~
- ~~Introduce a programme of Chief Officer peer reviews, to assist in developing a culture of innovation, agility, collaboration and continuous improvement.~~
- Undertake an annual update for the registration and publication of declarations of interest by the City Corporation's Members and Co-opted Members following the March 2017 Ward elections.
- Deliver the benefits from the programme of cross-cutting efficiency and effectiveness reviews resulting from the service based review, the 2% budget efficiency target and the Chief Officer ~~P~~peer ~~R~~eviews.
- ~~Complete the review of information security and management, leading to: the identification of Information Asset Owners; the production of an information asset register; the development of an Information Management Policy, and the implementation of an appropriate Data Classification Scheme.~~Publish a new Information Management (IM) Strategy with recommendations for an Information Management Operating Model, which will require:
 - the set-up of an IM organisation with additional job roles.
 - a change to the method of information management in the City Corporation.
 - specific projects and "units of work" to be delivered in 2018/19.

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- ~~Develop-Implement the a-new risk appetite framework~~ for the City Corporation, ~~linked to the City's objectives and the external environment~~, which reflects ~~the City's~~ capacity to manage risk and willingness to take risk in order to meet the strategic objectives.
- Review the corporate risk register following the adoption of the City Corporation's new Corporate Plan.
- Review project and programme governance arrangements, to improve the handling of corporate and departmental projects, including reviewing the terms of reference of relevant governance groups and a process for escalating risks to the appropriate levels.
- Investigate ISO22301 accreditation for our business continuity services.
- Extend the remit of the Audit & Risk Management Committee to include oversight of the audit, risk and anti-fraud approaches in respect of the City of London Academies Trust.

This annual governance statement was approved by the City Corporation's Audit and Risk Management Committee on ~~24-29 July-May 2017~~2018.

John Barradell
Town Clerk and Chief Executive

Date:

Catherine McGuinness
Chairman, Policy and Resources
Committee
Date: