

Agenda Item 4	Appendix
Code of Corporate Governance	<b>A</b>



**LOCAL CODE  
OF  
CORPORATE GOVERNANCE**

**2025**

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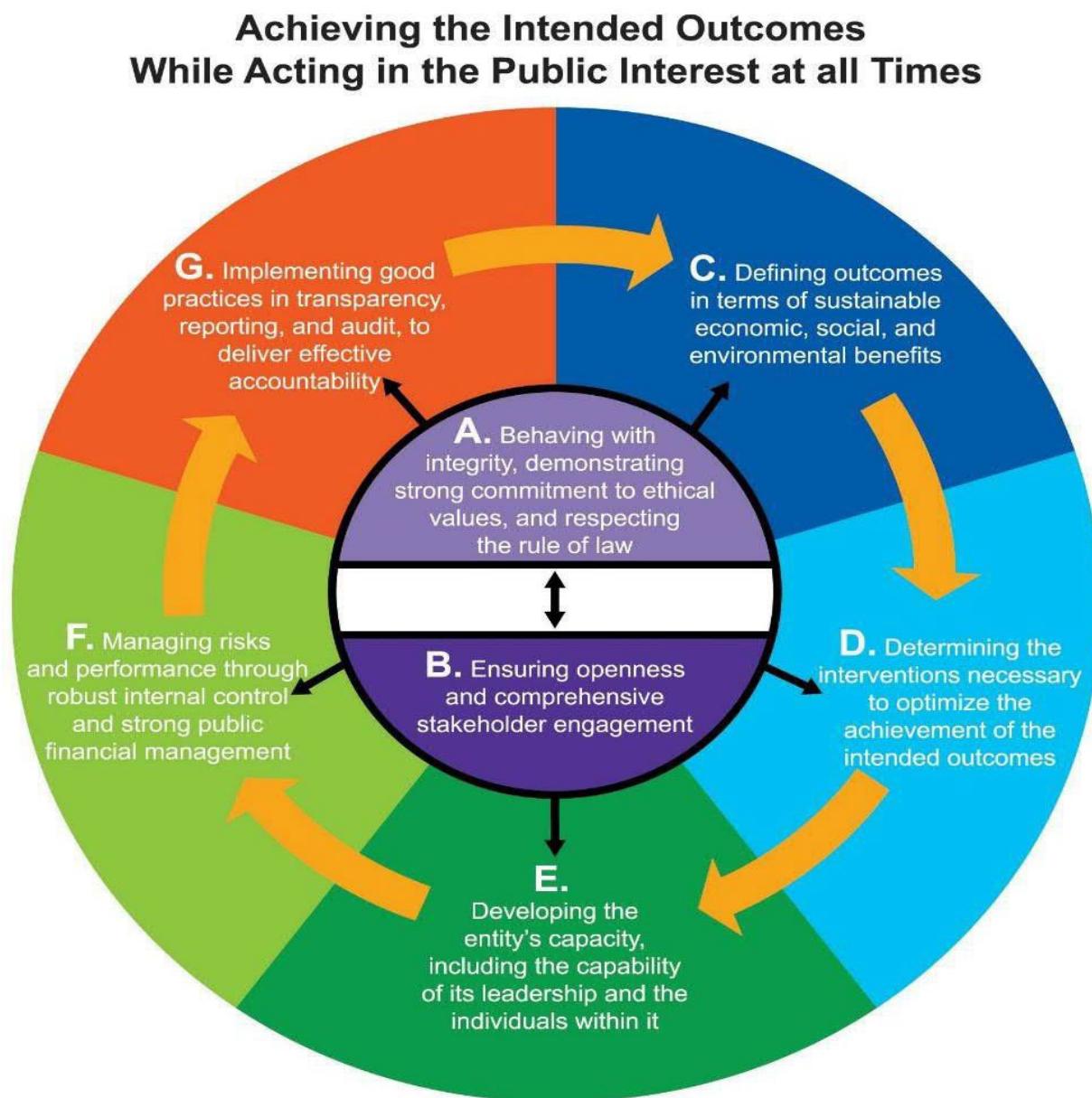
## Foreword

Good governance underpins the way in which Cambridgeshire and Peterborough Combined Authority ('CPCA') delivers its services. It involves effective collaboration, transparent decision making and balancing current financial challenges with longer term planning. Corporate governance is defined as "The system by which local authorities direct and control their functions and relate to communities".

CPCA has approved and adopted a local code of corporate governance which is consistent with the principles of the best practice guidance issued jointly by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE). CIPFA/SOLACE updated in 2016 with their new framework to assist organisations in ensuring that resources are directed in accordance with agreed policy and according to priorities, that there is sound and inclusive decision making and that there is clear accountability for the use of those resources in order to achieve desired outcomes for service users and communities. The seven core principles are:

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
- Ensuring openness and comprehensive stakeholder engagement
- Defining outcomes in terms of sustainable economic, social, and environmental benefits
- Determining the interventions necessary to optimise the achievement of the intended outcomes
- Developing the entity's capacity, including the capability of its leadership and the individuals within it
- Managing risks and performance through robust internal control and strong public financial management
- Implementing good practices in transparency, reporting, and audit to deliver effective accountability

Diagrammatically, this can be demonstrated as:



CPCA is committed to meeting these principles. This statement sets out how the supporting principles beneath each statement will be achieved, monitored and reviewed. It is the responsibility of the Audit and Governance Committee to keep corporate governance matters under review. As part of this process, it undertakes regular reviews throughout the year of the processes and systems in place with a formal review at the year end. This includes the results of the work carried out by internal audit. The Committee reviews and agrees the Annual Governance Statement, ahead of approval, which forms part of the statutory annual accounts which are subject to external audit.

## Principle A: Integrity, Ethical Values and Rule of Laws

### ***Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law.***

The Combined Authority is accountable not only for how much it spends, but also for how it uses the resources under its stewardship. This includes accountability for outputs, both positive and negative, and for the outcomes they have achieved. In addition, we have an overarching responsibility to serve the public interest in adhering to the requirements of legislation and government policies. It is essential that, as a whole, we can demonstrate the appropriateness of all our actions and have mechanisms in place to encourage and enforce adherence to ethical values and respect the rule of law.

Principle	How we achieve it	Evidence	Key Documents
We will behave with integrity	Ensures members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated, Leads by example, ensuring members take the lead in establishing specific standard operating principles and values (building on the Seven Principles for Public Life) for the Combined Authority and its staff and that they are communicated and understood. Utilises the operating principles and values above as a framework for decision making and other actions. Demonstrate, communicate and embed the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively.	A Code of Conduct for Members to ensure high standards of conduct are maintained. The code also applies to members of committees, co-opted members, and members of the Business Board.  Established procedure for dealing with breaches of the Member Code of Conduct, which is subject to a review and update in Autumn 2025 to ensure that it remains fit for purpose and follows current best practice  Registers of Members' interests are published on the CPCA's, and constituent council's, websites.  Members and Officers must declare gifts or hospitality with an estimated value of at least £50. A gifts and hospitality policy has been introduced including Records of gifts and hospitality and standard forms and Members register is published on the CPCA's and Business Board's websites  Officers must also declare any gifts or hospitality received either before, during or after the procurement.  Standard decision-making reporting format and processes in place to ensure that all those responsible for taking decision have the necessary information on which to do so  Members' declaration of interests are a standing item on all CPCA and Business Board agendas. Minutes show declarations of interest were sought and the appropriate declarations made.  Complaints, whistleblowing and third-party confidential reporting policy and procedure is published on the CPCA website	Constitution includes Member Code of Conduct and procedure dealing with breaches  Declarations of Interest forms  Gifts and Hospitality Policy  Gifts and Hospitality register  Report templates  Agenda templates  Whistleblowing Policy, Third Party Confidential reporting policy,

Principle	How we achieve it	Evidence	Key Documents
		<p>policy requires all conflicts of interests to be declared annually, including nil returns.</p> <p>Induction programmes for new staff incorporate the required standard of behaviour expected will be developed.</p> <p>Equality, Diversity and Inclusion Policy is available for staff on the HR Hub within the CPCA Intranet.</p> <p>Declarations and conflicts of interest were subject to an internal audit review during Summer 2025. The recommendations for improvement and/or best practice will be acted upon by officers. This includes an annual declaration by staff which has now been done.</p>	<p>Equality, Diversity and Inclusion Policy</p>
We will demonstrate strong commitment to ethical values	<p>The Combined Authority has approved and embedded a set of values (known as its 'CIVIL' values) which is a commitment to the key areas of Collaboration, Integrity, Vision, Innovation and Leadership in the ways of working.</p> <p>The Audit and Governance Committee oversee the Authority's ethical standards and performance.</p> <p>Robust policies and procedures which place emphasis on agreed ethical values which underpin behaviour and all aspects of the Combined Authority's culture and operation.</p> <p>The Authority requires that external providers of services are required to act with integrity and in compliance with the same ethical standards expected of the Combined Authority.</p>	<p>Policies and procedures that make the constitution, which sets out delegations to the Combined Authority, its Committees and Senior Officers, and the decision-making processes.</p> <p>All committees and working groups have clear terms of reference.</p> <p>Annual reports are published regarding audit activities and governance arrangements.</p> <p>An anti-fraud and corruption policy that is reviewed with associated action plans where required.</p> <p>Mandatory fraud training for staff.</p> <p>Six-month reminder to staff/Members to register gifts and hospitality, with a revised gifts and hospitality and a new sponsorship policy to be approved in autumn 2025.</p> <p>Audit and Governance Committee's annual report includes a report of the past year's complaints and Freedom of Information requests.</p> <p>The Combined Authority has agreed CIVIL values that are embedded throughout the organisation and evidenced through recruitment processes, general expected behaviours and showcased through the CIVIL awards.</p> <p>As part of the Authority's LEAP process the annual staff appraisals and mid-year reviews include specific reference to evidencing and displaying expected CIVIL values and behaviours.</p> <p>Partnership agreements comply with own procurement rules - partners and contractors to operate within our core values and demonstrates transparency with regards to any potential conflicts</p> <p>Member Code of Conduct training is taking place on 25 November 2025.</p>	<p>Constitution, Annual Governance Statement and Audit reports</p> <p>Anti-Fraud and Corruption Policy;</p> <p>CIVIL Values</p> <p>Statement of Partnership Working</p>

Principle	How we achieve it	Evidence	Key Documents
We will respect the rule of the law	<p>Ensures members and staff demonstrate a strong commitment and adheres to relevant laws and regulations.</p> <p>Creates the environment to ensure that the statutory officers, other key post holders and Members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements, optimising full powers available to the benefit of communities, citizens and other stakeholders.</p> <p>Deals with breaches of legal and regulatory provisions promptly and effectively.</p>	<p>The Combined Authority has a Monitoring Officer to ensure that policies, procedures, laws and regulations are followed. They attend all Combined Authority meetings and appoint a Deputy to act in their absence.</p> <p>The Chief Finance Officer is designated as the statutory S73 Officer for the Combined Authority and is responsible for the proper administration of the Authority's financial affairs.</p> <p>A scheme of delegation is set out within the Constitution and identifies responsibilities and authorisation levels.</p> <p>Internal Audit report annual activity and outcomes to the Audit &amp; Governance Committee based on assurances gained and issues identified where appropriate.</p> <p>External Audit provides an Annual Audit Letter which is presented to the Audit and Governance Committee and published on the Combined Authority's website.</p> <p>The Combined Authority will maintain a record of complaints made to the Local Government Ombudsman as well as self-referring to the Information Commissioner where information data breaches occur and actions taken to improve processes.</p> <p>The Combined Authority has a Data Protection Policy.</p>	<p>Constitution includes Financial Regulations and Contract Rules, Job descriptions for the Executive Director Resources, Director of Legal and Governance, Assistant Director Finance, and Head of Legal</p> <p>Head of Internal Audit's annual opinion</p> <p>External Audit annual letter</p> <p>Data Protection Policy</p>

## Principle B: Openness and Stakeholder Engagement

### ***Ensuring openness and comprehensive stakeholder engagement,***

Local government is run for the public good. The Combined Authority should ensure openness in its activities. Clear, trusted channels of communication and consultation should be used to engage effectively with all groups of stakeholders, such as individual citizens and service users, as well as institutional stakeholders.

Principle	How we achieve it	Evidence	Key Documents
We will be open	<p>Supports an open culture through demonstrating, documenting, and communicating the Combined Authority's commitment to openness.</p> <p>Makes decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. Where a decision is considered confidential, reasons for this are provided.</p> <p>Provides clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear.</p>	<p>Adoption of a Publication Scheme that describes the kinds of information available and provides guidance about how submit a Freedom of Information request.</p> <p>The Combined Authority's committee meetings timetable is published and the public are able to both view the Committee meeting reports and attend the meetings unless there is a reason for confidentiality (exempt reports). All formal Committee/Board meetings are webcast live to the public and copies of the webcast are retained on the website for a set period to allow meetings to be viewed by the public after they have taken place. The public are able ask questions and present petitions at all Combined Authority meetings.</p> <p>The forward plan of all decisions to be taken is published each month.</p> <p>Committee meetings are minuted, detailing decisions/deliberations and are published.</p> <p>A standard reporting process is utilised for consistency this includes setting the purpose of the report as it relates to the CA's objectives and sections setting out legal and financial implications.</p> <p>A rolling schedule of projects, outlining a brief description of the project, names of key recipients of funds/contracts and amounts of funds designated by year.</p> <p>The Single Assurance Framework sets out the robust assurance, project appraisal and value for money processes that the Combined Authority has put in place for programme and project development and delivery in alignment with the requirements set out in the English Devolution Accountability Framework (EDAF) and has been approved by the Department of Housing, Communities and local Government (DHCLG) –now renamed as the Ministry for Housing, Communities and Local Government (MHCLG).</p> <p>Officer Decision Notices are published online to support full transparency.</p>	<p>Freedom of Information and Publication Scheme</p> <p>Public meetings timetable</p> <p>Questions and petitions scheme</p> <p>Forward Plan</p> <p>Board and committee meetings agendas, reports and minutes</p> <p>Single Assurance Framework</p>

Principle	How we achieve it	Evidence	Key Documents
		<p>The Risk Management Framework is CPCA's approach to identifying, assessing, managing and monitoring risks to achieve the Authority's objectives. Ensuring informed decision-making, transparency and effective use of public resources through assessment of risk.</p> <p>The Authority's commitment to capturing the impact of its work is demonstrated by the Monitoring and Evaluation Framework and the Performance Management Framework along with the associated quarterly performance reporting to Scrutiny Committee and the CA Board ensuring that those impacts are reported to the Public.</p> <p>The Authority is committed to improving the accessibility of information with a new website being launched in early 2025/26.</p> <p>Freedom of information provision sits within the Legal &amp; Governance Service. Training and awareness is provided to staff via the all teams staff meeting, the 'Happenings' newsletter and staff information communications. The Data Protection Officer has a weekly meeting with the Monitoring Officer to discuss ongoing freedom of information work including freedom of information assessments in new areas where required. Freedom of information responses are published on the Combined Authority website and regular updates are provided to Corporate Management Team (CMT) and formal committee meetings in relation to the number of requests and response times.</p>	Risk Management Framework  Monitoring and Evaluation Framework  Performance Management Framework
We will engage comprehensively with institutional stakeholders	<p>Effectively engages with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably.</p> <p>Utilise formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively</p> <p>Ensuring that partnerships are based on trust and a shared commitment</p> <p>A culture that promotes and accepts challenge among partners</p> <p>The added value of partnership working is explicit in the work that we do.</p>	<p>The Combined Authority operates extensively with institutional stakeholders and partners to identify the most effective approaches to service delivery.</p> <p>Working closely with our Constituent Councils, we use the powers and funding devolved from Government to make strategic decisions that support sustainable growth and prosperity across our region.</p> <p>Our partnership approach extends beyond local government and across regional boundaries, encompassing collaboration with businesses, schools, colleges, universities, health services, emergency services, and community organisations. These strong and evolving relationships enable us to design and deliver more effective, evidence-based solutions.</p> <p>Our commitment to stakeholder engagement and collaboration is set out in our Corporate Plan and Local Growth Plan, which guide our collective efforts to drive inclusive growth and deliver positive outcomes for all communities across Cambridgeshire and Peterborough.</p> <p>This approach is continuously evolving, with recent and current partnerships including: Strategic Place Partnership (SPP) with Homes England which enables greater collaboration and partnership working to deliver place-based growth and regeneration. SPP underpinned by a signed Memorandum of Understanding (MOU) with a partnership business plan under development.</p>	Corporate Plan 2025-29  Local Growth Plan  Communications, Engagement and Public Affairs Strategy  SPP MOU

Principle	How we achieve it	Evidence	Key Documents
		<p>The Combined Authority Chief Executive has recently joined the Innovate Cambridge Board and the Oxford- Cambridge Supercluster Board to strengthen ways of working.</p> <p>Taking a commissioning approach to the delivery of capital schemes via grant agreements with constituent Councils and national partners (e.g. Network Rail).</p> <p>Engaging with other Combined Authorities is undertaken by both the Mayor and senior officers are part of regular national Combined Authority meetings. For the Mayor this includes the Council of Nations and Regions and the UK Mayors Network. Officer meetings include areas such as CEXs meetings, Finance and Policy &amp; Evaluation.</p> <p>The Combined Authority consults in many ways to ensure that stakeholders have the opportunity to contribute views to the organisation's vision, performance and intended outcomes. Examples include – bus franchising proposal and draft budget and MTFP.</p> <p>The Combined Authority Chief Executive is a member of the Cambridgeshire Public Services Board which provides an opportunity for the leaders of public sector organisations in Cambridgeshire and Peterborough to come together and make strategic interventions and to provide better outcomes for our residents and place.</p> <p>Partnership agreements are in place which determine the roles and responsibilities for each partnership arrangement where it is expected that the Combined Authority's values are adhered to.</p>	Various consultation documents
We will engage stakeholders effectively including citizens and service users	<p>Consults with or involve individual citizens, service users and other stakeholders to ensure that service provision is contributing towards the achievement of intended outcomes.</p> <p>Uses formal and informal consultation and engagement to determine the most appropriate and effective interventions/ courses of action.</p> <p>Ensures communication methods are effective and that members and officers are clear about their roles with regard to community engagement.</p> <p>Encourages, collects and evaluates the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs.</p> <p>Implements effective feedback mechanisms in order to demonstrate</p>	<p>The Combined Authority seeks views from individuals, organisations and businesses on a number of areas including strategies, policies and detailed projects, using a variety of means including face to face and online.</p> <p>The Mayor and Members ensure they are accessible to the community and contact details are held on the Combined Authority's website;</p> <p>Question time at Board and committee meetings and petition scheme is advertised on the Combined Authority website</p> <p>Public consultation takes place on the budget and other key policy documents and responses and any proposed changes to the policy as a result are included in public reports. Significant recent consultations and engagement exercises include development of a Shared Ambition, Bus Reform and development of a new Local Growth Plan.</p>	<p>Member contact details on website, budget,</p> <p>Constitution includes questions and petition scheme</p>

Principle	How we achieve it	Evidence	Key Documents
	<p>how their views have been taken into account.</p> <p>Balances feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity.</p>		

## Principle C: Economic, Social and Environmental Benefits

### ***Defining outcomes in terms of sustainable economic, social, and environmental benefits***

The long-term nature and impact of many of the Combined Authority's responsibilities mean that it should define and plan outcomes and that these should be sustainable. Decisions should further the Authority's purpose, contribute to intended benefits and outcomes, and remain within the limits of authority and resources. Input from all groups of stakeholders, including citizens, service users, and institutional stakeholders, is vital to the success of this process and in balancing competing demands when determining priorities for the finite resources available.

Principle	How we achieve it	Evidence	Key Documents
We will define outcomes	<p>Maintains a statement of the Combined Authority's purpose and intended outcomes containing appropriate performance indicators, which provides the basis for the organisation's overall strategy, planning and other decisions.</p> <p>Identifies the intended impact on, or changes for, stakeholders including citizens and service users, both in the short and long term.</p> <p>Delivers defined outcomes on a sustainable basis within the resources that will be available.</p> <p>Identifies and manages risks to the achievement of outcomes.</p> <p>Manages service user's expectations effectively with regard to determining priorities and making the best use of the resources available.</p>	<p>4-year Corporate Plan, Annual Business Plan and Directorate Business Plans set out ambitions, detailed plans and measurable outcomes set out in interim Outcomes Framework.</p> <p>Medium term financial strategy and effective quarterly budget reporting processes ensures sustainability is effectively managed.</p> <p>The Combined Authority's risk management framework and associated risk registers identify, address and treat areas that may impact on the achievement.</p> <p>Corporate Risk Register is taken to every Audit &amp; Governance meeting along with a deep dive, and taken to CPCA Board quarterly</p> <p>CMT, Overview and Scrutiny Committee and Board receive quarterly corporate performance monitoring reports in line with Performance Management Framework.</p> <p>Programmes and projects are assessed against the Single Assurance framework with outcomes set and confirmed when they are approved.</p> <p>Programmes and projects are monitored against the Monitoring and Evaluation Framework</p>	<p>2025-2029 Corporate Plan</p> <p>Interim Outcomes Framework</p> <p>Annual Business Plan</p> <p>Direktorate Business Plans</p> <p>Medium Term Business Plan</p> <p>Budget reports to CA Board</p> <p>Risk management framework and associated risk registers</p> <p>Risk reports to Audit &amp; Governance and Board</p> <p>Assurance Framework</p> <p>Performance Management Framework</p> <p>Quarterly Corporate Performance Reports to Board</p> <p>Monitoring and Evaluation Framework</p>

		Gateway Review reports produced in line with National Evaluation Framework provide evidence of the impact of the Investment Fund.	Gateway Review Mid Term Report, 2024 Gateway Review Final Report (due end 2025)
We will provide sustainable economic, social and environmental benefits	<p>Considers economic, social and environmental impact of policies, plans and decisions when taking decisions about service provision.</p> <p>Takes a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between intended outcomes and short-term factors such as the political cycle or financial constraints.</p> <p>Determines the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs.</p>	<p>A Cambridgeshire and Peterborough Independent Economic Review (CPIER) published in September 2018, outlined the long-term drivers of growth across the Cambridgeshire and Peterborough economy. This evidence base was refreshed and broadened in 2024, with the publication of a comprehensive State of the Region review of the economic, socio-economic and environmental condition of the region. The State of the Region data portal is refreshed quarterly with latest available data, and reports are published annually.</p> <p>The 2025-2029 Corporate Plan was adopted in September 2025 and provides the strategic framework for the organisation for the Mayoral term. It proposes key activities that will focus the Authority's work around six objectives: Connectivity, Growth, Jobs, Homes, Resilience and Performance. The Corporate Plan is part of a cohesive strategic framework, which includes a Local Growth Plan.</p> <p>The region's Local Growth Plan (LGP) was adopted in October 2025. The LGP is the 10-year <i>guiding light</i> on how the Combined Authority will allocate its time and resources to support the growth of the area's economy. The LGP includes a baseline growth forecast and two further LGP growth scenarios, doubling GVA (our core growth scenario) and tripling GVA (our aspirational Mayoral target). The LGP also identifies key six sectors and four opportunity zones and the barriers that need to be addressed. The LGP is underpinned by an emerging pipeline of priority projects.</p> <p>All the Authority's plans and strategies are fully integrated, with a clear line of sight from the Corporate Plan through to directorates, teams, and individual objectives. This ensures alignment at every level of the organisation and is supported by an Annual Business Plan and annual Directorate Business Plans.</p>	<p>Cambridgeshire and Peterborough Independent Economic Review (September 2018)</p> <p>State of the Region online data portal</p> <p>State of the Region Reports, 2024 and 2025</p> <p>2025-2029 Corporate Plan</p> <p>Local Growth Plan, Oct 2025</p> <p>Annual Business Plan Directorate Business Plans</p>

## Principle D: Achievement of Intended Outcomes

### **Determining the interventions necessary to optimise the achievement of the intended outcomes.**

The Combined Authority achieves its intended outcomes by providing a mixture of legal, regulatory, and practical interventions. Determining the right mix of these courses of action is a critically important strategic choice that the Combined Authority has to make to ensure intended outcomes are achieved. It needs robust decision-making mechanisms to ensure that defined outcomes can be achieved in a way that provides the best trade-off between the various types of resource inputs while still enabling effective and efficient operations. Decisions made need to be reviewed continually to ensure that achievement of outcomes is optimised.

Principle	How we achieve it	Evidence	Key Documents
We will determine interventions	Ensures decision makers receive objective information covering a variety of options indicating how intended outcomes would be achieved along with the associated risks and value achieved.	<p>The strategic priorities are set out in the Corporate Plan which shapes the decision making of the Combined Authority and ensures interventions are aligned with priorities to deliver the aims and objectives.</p> <p>This ties into the Local Growth Plan, which is a 10-year <i>guiding light</i> on how the Combined Authority will allocate its time and resources to support the growth of the area's economy.</p> <p>We apply the principle of government's 5 stage business model and treasury green book principles, along with monitoring and evaluation processes applicable to the projects we fund.</p> <p>The format of decision-making reports ensures that all relevant information is considered such as analysis of options, resource implications, and outcomes of Integrated Impact Assessment etc. Options are clearly defined and analysed to ensure decisions are based on the best possible information.</p> <p>Project appraisal processes seek to ensure maximum value for money from investments in programmes and projects. The Single Assurance Framework (SAF) is applied to these projects and ensure that they are effectively assessed (in terms of analysis of options, resource implications and strategic outcomes) and evaluated before approval is sought to proceed and that outcomes are achieved.</p> <p>Papers presented to the Funding Committee and Combined Authority Board are reviewed by the S73 Officer and Monitoring Officer prior to publication.</p>	Corporate Plan  Local Growth Plan  Monitoring and Evaluation Framework  Single Assurance Framework
We will plan interventions	Consult and consider feedback from citizens and service users when making decisions about service improvements or closures in order to prioritise competing demands within limited resources, whilst considering future impacts.  Ensure that those making decisions,	<p>Financial reporting processes which include budget setting processes and budget monitoring are clearly defined to highlight budget pressures where intervention may be required.</p> <p>Performance monitoring against key performance indicators and benchmarking is undertaken and reported to the Corporate Management Team and Board quarterly.</p> <p>Financial and legal representation at committee meetings. Financial and Legal</p>	Corporate Plan Medium Term financial plan Local Growth Plan Local Transport and Connectivity Plan

Principle	How we achieve it	Evidence	Key Documents
	<p>whether for the authority or any partnerships, are provided with information that is fit for purpose, relevant and timely.</p> <p>Ensure that proper professional advice on matters that have legal or financial implications is available, recorded and used appropriately.</p>	<p>review and sign off is required for business cases, approving certain project spend et cetera.</p> <p>Committee and Board reporting framework requiring legal and financial authorisation prior to issue.</p>	<p>Monitoring and Evaluation Framework</p> <p>Quarterly Financial Reports</p> <p>Quarterly Corporate Performance Reports</p>
We will optimise achievement of intended outcomes	<p>Ensure that risk management is embedded into the culture of the authority, with members and managers at all levels.</p> <p>Ensure that effective arrangements for whistleblowing are in place and accessible to officers, staff and all those contracting with or appointed by the authority.</p> <p>Ensure that delivery of our services and projects are monitored, reported on and, where disruptions occur these are recognised early and reacted to.</p>	<p>The annual budget is prepared for scrutiny and approval by Members and published in line with statutory requirements as part of the medium-term financial plan. The Medium-term financial plan is consulted on between November and the end of January every year including with our Constituent Authorities and the public.</p> <p>The single assurance framework provides the means to assess projects in terms of outcomes to enable a prioritisation of interventions.</p> <p>A risk management framework that is regularly reviewed by senior management and the Audit and Governance Committee including an annual risk appetite statement.</p> <p>There are regular performance reports to the Funding Committee (on the most material projects) and the Combined Authority Board (on all operations), including explanation where there are material variances expected or seen. Where changes are needed to in-delivery services and projects these are reported and requested via the relevant Thematic Committee, in the case of services, and via the Single Assurance Framework change control process for projects.</p> <p>Formal monthly reporting of corporate risks takes place at the Corporate Management team Executive level in addition to corporate risk reporting</p> <p>The annual internal audit plan is approved at the Audit and Governance Committee.</p> <p>Bi-annual Internal audit action progress is reported at the Audit and Governance Committee.</p> <p>A whistleblowing policy is accessible to all, detailing key officers and feedback processes.</p> <p>Ongoing review of projects and programme risk registers.</p>	<p>Medium-Term Financial Plan</p> <p>Single Assurance Framework</p> <p>Risk management Framework and Process</p> <p>Whistleblowing policy</p> <p>Risk register</p>

## Principle E: Capacity and Capability

### *Developing the organisation's capacity, including the capability of its leadership and the individuals within it.*

The Combined Authority needs appropriate structures and leadership, as well as people with the right skills, appropriate qualifications and mind-set, to operate efficiently and effectively and achieve their intended outcomes within the specified periods. It must ensure that it has both the capacity to fulfil its own mandate and to make certain that there are policies in place to guarantee that its management has the operational capacity for the organisation as a whole. Because both individuals and the operating environment will change over time, there will be a continuous need to develop capacity as well as the skills and experience of the leadership and of individual staff members. Leadership is strengthened by the participation of people with many different types of backgrounds, reflecting the structure and diversity of communities.

Principle	How we achieve it	Evidence	Key Documents
We will develop the Combined Authority's capacity	<p>Review operations and performance to ensure their continuing effectiveness in light of new Corporate Plan and in advance of additional Devolved power.</p> <p>Improving resource use through appropriate application of techniques to determine how the authority's resources are allocated so that outcomes are achieved effectively and efficiently.</p> <p>Recognises the benefits of partnerships and collaborative working where added value can be achieved.</p> <p>Targeted use of consultancy support to provide specific skills, or increase capacity to deliver specific projects and commissions</p> <p>Workforce Planning, range of HR policies and guides for Managers and Staff.</p> <p>Lobbying Government in order to secure a sustainable funding model for Combined Authority,</p>	<p>The Combined Authority has established an organisational structure. Following the adoption of the new 4-year Corporate Plan there will be a period of considering what resource realignment is required to deliver agreed priorities and responsibilities.</p> <p>Corporate Plan &amp; Directorate Business Plans outline priority areas of activity, with golden thread to individual annual objective setting cycle and mid-year reviews for all staff</p> <p>Capacity and Capability Workstream led by a member of CMT established. Mapping work completed, identification of short resource requirements and prioritized recruitment to new functional areas aligned to English Devolution &amp; Community Empowerment Bill.</p> <p>Workforce planning cycle, informed by engagement with Directors.</p> <p>CSR and Budget submissions and consultation responses to Government.</p>	<p>Staffing structure</p> <p>LEAP cycle</p> <p>Workstream updates, Devolution updates to Board</p> <p>HR Policies</p> <p>Various submissions to Government</p>
We will develop the capability of the Combined Authority's leadership and other individuals	<p>Has protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained.</p>	<p>The Combined Authority has a robust framework via the constitution of the roles and responsibilities of members and officers that encompass the Mayor, Members, Overview and Scrutiny Committee and Audit and Governance Committee.</p> <p>The Mayor, Board and Committees hold responsibilities set out in the Combined Authority's Constitution which sets out their respective roles.</p>	<p>Constitution</p> <p>Senior Management job description, HR</p>

Principle	How we achieve it	Evidence	Key Documents
	<p>Publishes a statement that specifies the types of decisions that are delegated and those reserved for collective decision making.</p> <p>Ensure the mayor and the chief executive have clearly defined and distinctive leadership roles.</p> <p>Develops the capabilities of members and senior management to achieve effective shared leadership and to enable the Combined Authority to respond successfully to changing legal and policy.</p> <p>Has structures in place to encourage public participation.</p> <p>Holding staff to account through annual objective setting and appraisal reviews, LEAPs which take account of training, development needs and fit with CIVIL values..</p> <p>Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing.</p>	<p>The scheme of delegation is in place and reviewed annually;</p> <p>Overview and Scrutiny Committee members receive an extensive training programme delivered by external providers this includes training on their strategic role within a Combined Authority, work programming and running an effective scrutiny session, budget scrutiny etc .</p> <p>Audit and Governance Committee and Overview and Scrutiny Committee members have received training on their role and specific topics.</p> <p>Officers are appointed using competency-based job descriptions.</p> <p>Various HR policies exist to support the performance of staff including Recruitment and Retention, Capability and Attendance Management.</p> <p>CMT development programme</p> <p>Staff Appraisals have been linked to the Combined Authority's core values, known as CIVILs</p> <p>LEAPS which take place annually with a six-monthly review and the opportunity to discuss LEAP objectives at regular 121 meetings.</p> <p>Agreed training programme, consisting of mandatory training modules and, apprenticeships. Training programmes commissioned based on review of learning and development needs identified through LEAPs and to support organisational priorities.</p> <p>Health and Safety policies designed to protect and enhance the welfare of staff will be actively promoted and monitored.</p>	<p>policies</p> <p>Constitution</p> <p>Job descriptions</p> <p>HR Policies</p> <p>CIVILS</p> <p>LEAPs</p> <p>HR training programme</p> <p>Wellbeing Strategy</p>

## Principle F: Managing Risks and Performance

### ***Managing risks and performance through robust internal control and strong public financial management***

The Combined Authority needs to ensure that the governance structures it has implemented can sustain an effective performance management system that facilitates effective and efficient delivery of planned services. Risk management and internal control are important and integral parts of a performance management system and crucial to the achievement of outcomes. Risk should be considered and addressed as part of all decision making activities.

A strong system of financial management is essential for the implementation of policies and the achievement of intended outcomes, as it will enforce financial discipline, strategic allocation of resources, efficient service delivery, and accountability.

It is also essential that a culture and structure for scrutiny is in place as a key part of accountable decision making, policy making and review. A positive working culture that accepts, promotes and encourages constructive challenge is critical to successful scrutiny and successful delivery. Importantly, this culture does not happen automatically, it requires repeated public commitment from those in authority.

Principle	How we achieve it	Evidence	Key Documents
We will manage risk	<p>Implement robust and integrated risk management arrangements to inform decision making processes and ensure that they are working effectively.</p> <p>Ensure ownership for managing individual risks is clearly identified.</p>	<p>The Combined Authority's Risk Management Framework sets out the approach to Risk Management. This is overseen by Corporate Management Team and the Audit and Governance Committee.</p> <p>Monthly CMT and departmental reviews of risk and associated registers both operationally and strategically which identifies who owns the risks and timescales for any required actions.</p> <p>Risk reports are taken to every scheduled Audit &amp; Governance meeting along with Risk Deep Dives, and quarterly reports are taken to CPCPA Board.</p> <p>At a project level risk registers are produced and reviewed at project board meetings.</p> <p>Risk leads are identified for each risk and are responsible for implementing any mitigating actions in a timely manner.</p> <p>All risk leads are provided with in-depth training in not only the framework but also the process of risk reporting.</p> <p>Both the Risk Management Framework and Procedure are approved at the Combined Authority Board.</p>	<p>Risk Management Framework including Risk Appetite Statement</p> <p>Audit &amp; Governance and CPCPA Board Risk reports Corporate Risk Register</p> <p>Service Risk Registers</p> <p>Project Risk Registers</p> <p>Agenda, minutes of Audit and Governance Committee and CPCPA Board</p>

Principle	How we achieve it	Evidence	Key Documents
		<p>This Framework sits within a broader Single Assurance Framework (SAF). The SAF sets out the processes, approach and criteria that demonstrate to government the robust assurance, appraisal and value for money considerations.</p> <p>The Risk Management Procedure outlines the Combined Authority's approach to managing risk and outlines the tools and techniques involved in ensuring that this takes place effectively and in a consistent manner.</p> <p>The CPCA is committed to supporting the organisation-wide risk management culture that exemplifies high levels of risk maturity and best practice in the identification, evaluation and effective management of risk in respect of current activities and new opportunities.</p> <p>The Risk Management Framework has been reviewed by the following groups:</p> <ul style="list-style-type: none"> <li>• M10 Assurance network</li> <li>• Internal Officer Working Group – officers from across all CPCA service areas.</li> <li>• Partner Working Group – nominated officers from all CPCA constituent councils.</li> </ul> <p>The Authority undertakes an annual Risk Appetite Statement exercise.</p> <p>The statement provides the parameters for the management and decision making of the risks being faced by the organisation. Different categories of risk have been defined, and each has an appetite aligned to it. The associated risk appetite level aids in informing the target risk score for each risk within the corporate risk register.</p>	
We will manage performance	<p>Monitors service delivery effectively including planning, specification, execution and independent post implementation review.</p> <p>Makes decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation's financial, social and environmental position and outlook.</p> <p>Ensures an effective scrutiny or oversight function is in place which encourages constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing performance.</p> <p>Provides members and senior</p>	<p>The Chief Finance Officer is the authority's S73 Officer and is responsible for ensuring that effective financial management is in place.</p> <p>The Combined Authority has an established approach to financial governance involving members, senior officers and budget holders in the budget setting process and on-going monitoring arrangements by way of forecast performance against budget.</p> <p>The Scrutiny Standing Orders provide for the Overview and Scrutiny Committee to call in any CA decision. Throughout the year, it develops a programme that enables it to consider policy and objectives before, during and after decisions are made. The Overview and Scrutiny Committee has chosen to meet two days.</p> <p>The adopted Performance Management Framework and Monitoring &amp; Evaluation Framework details the Combined Authorities approach. Quarterly performance reporting to CMT, Scrutiny &amp; Board. Quarterly performance reporting to CMT on DBPs and corporate services. Moving towards a new Interim Outcomes Framework, a requirement of additional devolved functions linked to an Integrated Settlement, before the Board meetings to scrutinise the Board's agenda and make</p>	<p>Constitution includes Terms of Reference and procedure rules of Overview &amp; Scrutiny Committees, contract standing orders and Financial Regulations Budget monitoring reports to Board Performance Management Framework and quarterly performance</p>

Principle	How we achieve it	Evidence	Key Documents
	<p>management with regular reports on service delivery plans and on progress towards outcome achievement.</p> <p>Ensures there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements).</p>	<p>any representations to the Board via the Chair before decisions are made. The Overview and Scrutiny Committee have the power to scrutinise the work of the Business Board (the Business Board is undergoing a review in autumn 2025 and reference to it is subject to the outcome of that review).</p> <p>Agenda, minutes of Overview and Scrutiny meetings and any associated reports with recommendations to the CA are published on the CA's website.</p> <p>Contracts Standing Orders and Financial Regulations set out the council's arrangements and ensure that processes continue to operate consistently.</p> <p>The Performance Management Framework outlines the approach to managing performance. The Corporate Plan has historically included performance metrics, these are now moving into a new Interim Outcomes Framework, a requirement of additional devolved functions. Quarterly performance reporting to CMT, Overview and Scrutiny Committee and Board</p>	<p>reporting to Board</p> <p>Monitoring &amp; Evaluation Framework</p> <p>Constitution call in mechanism</p> <p>Agenda, minutes of Overview and Scrutiny</p>
We will have robust internal control	<p>Aligns the risk management framework and policies on internal control with achieving the objectives.</p> <p>Evaluates and monitor the authority's risk management and internal control on a regular basis.</p> <p>Ensures effective counter fraud and anti-corruption arrangements are in place.</p> <p>Ensures that additional assurance is provided by the Chief Internal Auditor regarding the governance, risk and control environment.</p> <p>Has an audit committee that receives assurance regarding arrangements for managing risk and maintaining an effective control environment and recommendations are listened to and acted upon.</p>	<p>An annual report is produced by Internal Audit which provides an opinion on the CA's control environment, and a self-assessment of its arrangements against the public sector internal audit standards and CIPFA's guide on the role of the Head of Internal Audit.</p> <p>Financial Regulations ensures responsibility and controls over expenditure are clearly assigned.</p> <p>The Annual Governance Statement (AGS) is produced for inclusion in the annual accounts that are subject to review and approval by the Audit and Governance Committee.</p> <p>The Audit and Governance Committee oversee the management of governance issues, internal controls, risk management and financial reporting.</p> <p>The Audit and Governance Committee Terms of Reference are reviewed annually and revised to reflect professional bodies' expectations and best practice.</p> <p>The Combined Authority has a Risk Management Framework which is agreed by senior management and the Audit and Governance Committee.</p> <p>Corporate risk register containing strategic risks is regularly reviewed and reported to the Audit and Governance Committee including deep dives into specific risks. An annual schedule of deep dives is agreed at the Audit and Governance Committee.</p> <p>Internal audit action implementation reporting takes place bi-annually to ensure that the Audit and Governance Committee can be assured that actions from internal audit exercises are completed in a timely manner.</p> <p>Risk management effectiveness is reviewed as part of the Annual Governance Statement and Head of Internal Audit annual reporting process.</p> <p>The Chief Internal Auditor is responsible for fraud and investigation activities. A strategy has been developed and annual investigation activity is reported to the</p>	<p>HoIA annual report, Annual Governance Statement</p> <p>Constitution includes terms of reference of committee</p> <p>Audit and Governance Committee Reports</p> <p>Anti-Fraud, Bribery, Corruption Policy and Strategy</p>

Principle	How we achieve it	Evidence	Key Documents
		audit committee.	
We will manage data	<p>Ensures effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data.</p> <p>Ensures effective arrangements are in place and operating effectively when sharing data with other bodies.</p> <p>Reviews and audits regularly the quality and accuracy of data used in decision making and performance monitoring.</p>	<p>Procedures for the effective, fair and lawful processing of data are set out in the Data Protection Policy and supporting information governance framework.</p> <p>The CA's ICT policies control access to the network and data held on it, with information regarding the use of passwords and sharing of data set out.</p> <p>Effective information sharing is undertaken in accordance with the Data Protection Act and the CA's Data Protection Policy. Needs to be updated Data Protection Policy to comply with GDPR</p> <p>Data Subjects are informed why their personal information is being collected and how it will be processed (including when shared with other bodies) through the appropriate form of privacy notices.</p> <p>Information Sharing Agreements are in place to document the sharing of information with other organisations.</p> <p>Data verification and validation processes are integrated within systems and processes.</p> <p>Procedures are in place for reporting data breaches which are recorded and reviewed to identify any remedial process actions required.</p> <p>Details of data breaches will be reported to senior management with self-referral to the ICO where required by ICO regulations.</p> <p>Mandatory data protection training is undertaken by staff. Internal audits that encompass data quality.</p> <p>Information governance strategy and associated policies, information risk register, data protection training</p>	Data Protection Policy
We will implement strong public financial management	<p>Ensures financial management supports both long term achievement of outcomes and short-term financial and operational performance.</p> <p>Ensures well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls.</p> <p>Annual Accounts produced and published in accordance with Required reporting timelines and subject to External Audit</p> <p>Unqualified External Audit Report</p>	<p>The Medium-Term Financial Plan, Forward Plan and Constitution identifies the resources and processes required in achieving both short and long term aims. The Medium Financial Plan is aligned to the CPCA Corporate Plan.</p> <p>Budget is subject to two phase scrutiny process which allows scrutiny of the in year position (phase 1) and scrutiny of the proposed draft budget (phase 2). This includes separate sessions for Economy and Growth, Place and Connectivity and the Corporate Core</p> <p>Regular finance and performance reporting to senior management and Board ensures pressures and risks are discussed and action is taken as appropriate in a timely manner.</p> <p>In-year monitoring and reporting of financial performance is reviewed regularly with CMT/Board/Committees being minuted.</p> <p>Reports produced for ADs/Directors supported by meetings with finance business</p>	<p>Medium Term Financial Plan and Corporate Plan</p> <p>Agenda, minutes from Overview and Scrutiny Committee</p> <p>Agenda, minutes from Board</p> <p>Grants Register</p> <p>Published Annual Accounts and Annual Governance Statement</p>

Principle	How we achieve it	Evidence	Key Documents
		<p>partners and follow-up meetings/correspondence as needed.</p> <p>Month end processes, quarterly reporting to Corporate Management Team/Board/Committees on longer term forecast position</p> <p>A Grants register is in place to support the management of financial risks and controls.</p> <p>Annual Accounts to External Audit and presented to Audit and Governance Committee in line with statutory reporting deadlines</p>	<p>External Auditors Reports on the Accounts</p> <p>Agenda, minutes from Audit and Governance Committee</p>

## Principle G: Transparency, Audit and Accountability

### ***Implementing good practices in transparency, reporting, and audit to deliver effective accountability***

Accountability is about ensuring that those making decisions and delivering services are answerable for them. Effective accountability is concerned not only with reporting on actions completed, but also ensuring that stakeholders are able to understand and respond as the organisation plans and carries out its activities in a transparent manner. Both external and internal audit contribute to effective accountability.

Principle	How we achieve it	Evidence	Key Documents
We will implement good practice in transparency	<p>Produces reports for the public and other stakeholders in an understandable style appropriate to the intended audience, ensuring that they are easy to access and interrogate.</p> <p>Strikes a balance between providing the right amount of information to satisfy transparency but can be understood by users to encourage public scrutiny.</p>	<p>Agendas, reports and minutes for CA and formal committees are published on the CA website in accordance with statutory deadlines. The Business Board agenda, reports and minutes are published on the website.</p> <p>Forward Plan of upcoming CA decisions published monthly</p> <p>Publication Scheme providing information on the website regarding CA business, expenditure and governance.</p> <p>The process for making Freedom of Information requests is clearly set out on the website</p> <p>Freedom of Information requests and responses are published on the website.</p> <p>Officer and Mayoral Decision Notices are published on the website</p>	<p>Board and committee agenda, reports and minutes</p> <p>Business Board agenda, reports and minutes</p> <p>Forward Plan</p> <p>Freedom of Information scheme</p> <p>Publication Scheme</p> <p>Publication of Freedom of Information Requests and Response</p> <p>Officer and Mayoral Decision Notices</p>
We will implement good practices in reporting	<p>Reports at least annually on performance, value for money and the stewardship of its resources.</p> <p>Ensures members and senior management own the results.</p> <p>Has robust arrangements for assessing the extent to which the principles contained in the Framework have been applied and publishing the results on this assessment including an action plan for improvement and evidence to demonstrate good governance (annual governance statement).</p> <p>Provides performance information that accompanies the financial statements is prepared on a consistent and timely basis.</p>	<p>The Combined Authority publishes its Annual Report and Statement of Accounts which is available on the website. It includes information on performance along with financial statements.</p> <p>The external auditor's report covering both the Combined Authority's accounts and Value for Money opinion are also published on the website once issued.</p> <p>An Annual Governance Statement is produced each year with the annual report and accounts</p>	<p>Annual Report and Statement of Accounts, Annual Governance Statement.</p> <p>External Auditor's annual report.</p>

Principle	How we achieve it	Evidence	Key Documents
Assurance and effective accountability	<p>Ensures that recommendations for corrective action made by external audit are acted upon.</p> <p>Provides an effective internal audit service with direct access to members which provides assurance with regard to governance arrangements and recommendations are acted upon.</p> <p>Encourages peer challenge, reviews and inspections from regulatory bodies and implementing recommendations.</p> <p>Obtains assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement.</p> <p>Ensures that when working in partnership, arrangements for accountability are clear and that the need for wider public accountability has been recognised and met.</p>	<p>An external audit programme is completed each year. External Audit recommendations are formally responded to and reported to Audit &amp; Governance Committee. Regular meetings are held with senior management and External Audit to review progress.</p> <p>An independent internal audit team commissioned from RSM which conforms to Public Sector Internal Audit Standards (PSIAS). Its Annual Plan and outcomes are reported to the Audit &amp; Governance Committee via the Head of Internal Audit Annual Audit Opinion.</p> <p>Follow up action is undertaken to monitor recommendations implementation.</p> <p>The Chief Internal Auditor has direct access to the Chair of the Audit and Governance Committee.</p> <p>Governance arrangements for partnerships and shared services are defined in partnership and contract agreements.</p> <p>An independent panel is utilised for setting member allowances.</p>	<p>External Audit Annual Report and Letter</p> <p>Annual Audit Plan HoIA Annual Report</p> <p>Internal Audit Charter,</p> <p>Internal Audit Effectiveness Report,</p> <p>Annual Governance Statement</p> <p>Internal Audit Reports</p>

**Documentation Review Schedule**

<b>Document</b>	<b>Production / Review Frequency</b>
Medium Term Financial Plan	Produced Annually
Annual Report	Produced Annually
Statement of Accounts	Produced Annually
Prudential Code and Treasury Management Strategy	Annual
Finance Reports	Quarterly
Annual Governance Statement	Produced Annually
Head of Internal Audit Opinion	Annual
Investigations Annual Report	Annual
External Audit Letter	Annual
Risk Management Framework	Reviewed Annually
Constitution	Reviewed Annually
Corporate Risk Register	Reviewed Monthly
Core Values – Behavioural Framework	As required
Corporate Priorities	Reviewed in line with Corporate Plan
Local Code of Corporate Governance 2024	Annual
Internal Audit Annual Plan	Annual
Financial Regulations	Annual (aligned to the Constitution)
Contract Rules	As required, considered regularly by officers.
Constitution	Ongoing, at least annually by way of formal consideration
Code of Conduct for Members	As required, considered regularly by the Monitoring Officer
Code of Conduct for Officers	Reviewed 3 yearly or in line with legal/ required changes
Anti-Fraud, Bribery and Corruption Policy and Strategy Statement	Reviewed Annually
Complaints Policy	Reviewed 3 yearly or in line with legal / required changes
Health and Safety Policy	Reviewed 3 yearly or in line with legal / required changes
HR Policies <ul style="list-style-type: none"> <li>• Attendance and Absence Management Policy</li> <li>• Capability Policy</li> <li>• Capability Procedure</li> <li>• CPCA Professional Development Policy</li> <li>• Dignity at Work Policy</li> <li>• Disciplinary Policy</li> <li>• Disciplinary Procedure</li> <li>• Eyesight Testing Guidance</li> <li>• Equality Diversity and Inclusion Policy</li> <li>• Family Leave Policy</li> </ul>	Reviewed 3 yearly or in line with legal / required changes

**Documentation Review Schedule**

Document	Production / Review Frequency
<ul style="list-style-type: none"> <li>• Fertility Treatment Policy</li> <li>• Flexible Working Request Policy</li> <li>• Grievance Policy</li> <li>• Grievance Procedure</li> <li>• Health and Safety Policy</li> <li>• Menopause at Work Policy</li> <li>• Menopause Handbook</li> <li>• Organisational Change Policy</li> <li>• Parental Bereavement Policy</li> <li>• Pay Policy</li> <li>• Pensions Discretionary Policy</li> <li>• Pregnancy Loss Policy</li> <li>• Probation Policy and Procedure</li> <li>• Recruitment Policy and Procedure</li> <li>• Retirement Policy</li> <li>• Time Off Policy</li> <li>• Travel Subsistence and Expenses Policy</li> <li>• TUPE Policy</li> <li>• Use of Social Media Policy</li> <li>• Gifts and hospitality policy</li> </ul>	
Whistleblowing Policy	Reviewed 3 yearly or in line with legal/ required changes
Information Governance Policy	To be reviewed annually
Single Assurance Framework	Reviewed Annually
Freedom of Information Policy	Reviewed annually or when legislation changes.
Privacy Policy	Reviewed annually
Records Management Policy	To be reviewed annually.
Performance Management Framework	Reviewed Annually
Procurement Policy	Reviewed annually or when legal or other requirements change
Use of Social Media Policy	Reviewed annually or when legal or other requirements change
Antivirus Policy	Reviewed annually or when legal or other requirements change
Backup Policy	Reviewed annually or when legal or other requirements change
Access Control Policy	Reviewed annually or when legal or other requirements change
Acceptable Usage Policy	Reviewed annually or when legal or other requirements change
Damaged Device Policy	Reviewed annually or when legal or other requirements change
IT Security Policy	Reviewed annually or when legal or other requirements change
Business Continuity Policy	Reviewed annually or when legal or other requirements change
Change Management Policy	Reviewed annually or when legal or other requirements change
Network Management Policy	Reviewed annually or when legal or other requirements change
Patch Management Policy	Reviewed annually or when legal or other requirements change
Password and Authentication Policy	Reviewed annually or when legal or other requirements change
Remote Access Policy	Reviewed annually or when legal or other requirements change
Data Incident Reporting Policy	Reviewed annually or when legal requirements change. Formal

**Documentation Review Schedule**

<b>Document</b>	<b>Production / Review Frequency</b>
	reporting annually to Audit and Governance
Data Protection Policy	Reviewed annually or when legal requirements change. Formal reporting annually to Audit and Governance Committee
Data Retention Policy	Reviewed annually or when legal requirements change. Formal reporting annually to the Audit and Governance Committee
Data Retention Schedule	Reviewed annually or when legal requirements change. Formal reporting annually to the Audit and Governance Committee
Procedure for Handling Data Subject Rights	Reviewed annually or when legal requirements change
Consent Policy	To be reviewed annually or when legal requirements change
Data Deletion Policy	To be reviewed annually or when legal requirements change