



To: Renfrewshire Integration Joint Board

On: 24 June 2022

Report by: Chief Finance Officer

Heading: Unaudited Annual Governance Statement 2021/22

Direction Required to	Direction to:	
Health Board, Council or	No Direction Required	х
Both	2. NHS Greater Glasgow & Clyde	
	3. Renfrewshire Council	
	NHS Greater Glasgow & Clyde and Renfrewshire Council	

1. Purpose and Context

- 1.1. As members will be aware, normal practice is for the Unaudited Annual Governance Statement to be considered by the IJB's Audit, Risk and Scrutiny Committee and then subsequently brought forward to the IJB for approval within the Unaudited Accounts.
- 1.2. Owing to the circumstances where it has been necessary to cancel the planned meeting of the IJB Audit, Risk and Scrutiny Committee on 17 June 2022, there is a need for this report to be considered and approved by the IJB itself, as part of the requirements and timescales linked to the development of the Unaudited Annual Accounts for 2021/22.
- 1.3. The report sets out the IJB's Unaudited Annual Governance Statement for 2021/22 and provides an opportunity to review and comment on the content. It also allows for agreement to be sought on the assurances on the governance framework which can be provided to Renfrewshire Council and NHS Greater Glasgow & Clyde (NHSGGC).

2. Recommendation

It is recommended that the IJB:

• Approve the draft Annual Governance Statement, as set out in Appendix 1.

3. Background

3.1. The IJB is responsible for ensuring that its business is conducted in accordance with the law and appropriate standards, that public money is safeguarded, properly accounted for, and used economically, efficiently and effectively. The IJB also aims to foster a culture of continuous improvement in the performance of the IJB's functions and to make arrangements to secure best value.

- 3.2. In discharging these responsibilities, the Chief Officer has a reliance on NHSGGC and Renfrewshire Council's systems of internal control which support compliance with both organisations' policies and promotes achievement of each organisation's aims and objectives, as well as those of the IJB.
- 3.3. The IJB has adopted governance arrangements consistent where appropriate with the principles of CIPFA and the Society of Local Authority Chief Executives (SOLACE) framework "Delivering Good Governance in Local Government". The Annual Governance statement explains how the IJB has complied with these governance arrangements and meets the requirements of the Code of Practice on Local Authority Accounting in the UK, which includes the requirement for an Annual Governance Statement.
- 3.4. In addition, the annual governance statement which forms a key part of the annual accounts, provides readers of the accounts with assurance that the governance framework is fit for purpose.
- 3.5. The Annual Governance Statement for 2021/22 is attached and has been prepared in accordance with the relevant regulation and guidance taking account of the Internal Audit Annual Report and the Chief Officer's evaluation of the governance arrangements within each service area.
- 3.6. The Governance Statement is subject to statutory audit by the Council's External Auditors as part of their review of the annual accounts.

Implications of the Report

- 1. Financial none
- 2. HR & Organisational Development none
- 3. Community Planning none
- 4. Legal none
- 5. **Property/Assets** none
- 6. Information Technology none
- 7. Equality & Human Rights none
- 8. Health & Safety none
- 9. **Procurement** none
- **10. Risk** The Annual Governance Statement provides information on the effectiveness of the IJB Governance Framework. Specific risks identified from the Chief Auditor's Annual Report and the assessments of the CO are disclosed in the statement.
- **11. Privacy Impact** none.

List of Background Papers – None

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Annual Governance Statement 2021/22

The Annual Governance Statement explains the IJB's governance arrangements and reports on the effectiveness of the IJB's system of internal control.

Scope of Responsibility

The IJB is responsible for ensuring that its business is conducted in accordance with the law and appropriate standards, that public money is safeguarded, properly accounted for, and used economically, efficiently and effectively. The IJB also aims to foster a culture of continuous improvement in the delivery of the IJB's functions and to make arrangements to secure best value.

To meet this responsibility, the IJB has established arrangements for governance which includes a system of internal control. The system is intended to manage risk to support the achievement of the IJB's policies, aims and objectives. Reliance is also placed on the NHSGGC and Renfrewshire Council systems of internal control which support compliance with both organisations' policies and promotes achievement of each organisation's aims and objectives.

This system can only provide reasonable and not absolute assurance of effectiveness.

The IJB has adopted governance arrangements consistent, where appropriate, with the principles of CIPFA¹ and the Society of Local Authority Chief Executives (SOLACE) framework "Delivering Good Governance in Local Government" and the CIPFA Financial Management Code 2019 (FM Code). This statement explains how the IJB has complied with the governance arrangements and meets the requirements of the Code of Practice on Local Authority Accounting in the UK, which details the requirement for an Annual Governance Statement.

Purpose of the Governance Framework

The governance framework comprises the systems and processes, and culture and values, by which the IJB is directed and controlled. It enables the IJB to monitor the achievement of the objectives set out in the IJB's Strategic Plan. The governance framework is continually updated to reflect best practice, new legislative requirements and the expectations of stakeholders.

The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the IJB's objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them effectively.

Governance Framework and Internal Control System

The Board of the IJB comprises the Chair and seven other voting members. Overall, four are Council Members nominated by Renfrewshire Council, and four are Board members of NHSGGC. There are also a number of non-voting professional and stakeholder members on the IJB Board. Stakeholder members currently include representatives from the third and independent sector bodies, carers and service users. Professional members include the Chief Officer and Chief Finance Officer. The IJB, via a process of delegation from NHSGGC and Renfrewshire Council, and its Chief Officer, has responsibility for the planning, resourcing and operational delivery of all delegated health and social care within its geographical area.

The main features of the governance framework in existence during 2021/22 were:

¹ CIPFA – The Chartered Institute of Public Finance and Accountancy

Principles

 The IJB follows the principles set out in CoSLA's Code of Guidance on Funding External Bodies and Following the Public Pound for both resources delegated to the IJB by the Health Board and Local Authority and resources paid to its Local Authority and Health Service partners.

Formal frameworks

- The IJB is formally constituted through the Integration Scheme agreed by Renfrewshire Council and NHSGGC and approved by Scottish Ministers.
- The IJB operates within an established procedural framework. The roles and responsibilities of Board members and officers are defined within: Standing Orders and Scheme of Administration; Contract Standing Orders; Scheme of Delegation, and Financial Governance arrangements; these are subject to regular review.
- A Local Code of Corporate Governance was approved by the IJB early in 2017 which
 is subject to ongoing updates as required. Board members adhere to an established
 Code of Conduct and are supported by induction and ongoing training and
 development. Staff 'Performance and Personal Development' (PPD) schemes are
 also in place, the aim of which is to focus on performance and development that
 contributes towards achieving service objectives.
- The HSCP has a robust Quality, Care and Professional Governance Framework and supporting governance structures which are based on service delivery, care and interventions that are: person centred, timely, outcome focused, equitable, safe, efficient and effective. This is reported annually to the IJB and provides a variety of evidence to demonstrate the delivery of the core components within the HSCP's Quality, Care and Professional Governance Framework and the Clinical and Care Governance principles specified by the Scottish Government. The most recent report covering the period April 2020 to March 2021 was reviewed by the IJB in September 2021. It noted that governance arrangements which had been suspended or augmented at the start of the pandemic had now been fully reinstated using virtual methods, and that work had also been taken forward to strengthen local governance arrangements within Mental Health, Addictions and Learning Disabilities.

Strategic planning

- The overarching strategic vision and objectives of the IJB are detailed in the IJB's Strategic Plan – newly updated and approved for 2022-25 - which sets out the key outcomes the IJB is committed to delivering with its partners.
- The Strategic Planning Group sets out the IJB's approach to engaging with stakeholders. Consultation on the future vision and activities of the IJB is undertaken with its Health Service and Local Authority partners. The IJB publishes information about its performance regularly as part of its public performance reporting.
- The Medium-Term Financial Plan 2020/21 to 2025/26 outlined the financial challenges and opportunities the Health and Social Care Partnership (HSCP) anticipated over that five-year period and provided a framework which would support the HSCP to remain financially sustainable. It complemented the HSCP's Strategic Plan 2019-2022, highlighting how the HSCP Medium-Term Financial Planning principles would support the delivery of the IJB's strategic objectives and priorities.

- Given the much changed national and local context within which the IJB will be working over the next three years, the MTFP was updated and approved by the IJB in March 2022. As with the previous iteration, the new MTFP highlights the key financial challenges the IJB faces, as well as the strategic aims that it aspires to deliver and the community priorities that it strives to meet.
- For 2021-22. the HSCP has an interim Workforce Plan, developed in partnership with its parent organisations. Work is currently ongoing to develop a detailed Workforce Plan for 2022-25, aligning with the IJB's Strategic Plan and Medium Term Financial Plan covering the same period. This will be published by the end of October 2022 in line with Scottish Government timelines.

Oversight

- Effective scrutiny and service improvement activities are supported by the formal submission of reports, findings and recommendations by Inspectorates and the appointed Internal Audit service to the HSCP's Senior Management Team, the IJB and the IJB Audit, Risk and Scrutiny Committee, as appropriate.
- Performance management, monitoring of service delivery and financial governance is provided by the HSCP to the IJB, who are accountable to both the Health Board and the Local Authority. It reviews reports on the effectiveness of the integrated arrangements including the financial management of the integrated budget. This ensures there is regular scrutiny at senior management, committee and Board level. Performance is linked to delivery of objectives and is reported regularly to the IJB. Information on performance can be found in the Annual Performance Report published on the IJB website.

Risk management

- The IJB's risk management processes are well developed. The Risk Management Framework was last reviewed in early 2021 to reflect the maturity of the IJB and its approach to managing risk in the context of the pandemic, and was subsequently approved by the Audit, Risk and Scrutiny Committee in March 2021. This review process considered leading practice in other IJBs and comparable organisations and resulted in significant changes in the overarching framework and supporting risk management processes within the HSCP (with regards reporting, ownership, the establishment of a risk network, and development of additional guidance and training).
- The framework sets out the principles by which the HSCP and IJB identify and manage strategic and operational risks impacting upon the organisation, and forms a key strand of the IJB's overall governance mechanisms. This Risk Framework is reviewed every two years, with the next review scheduled in early 2023.
- The IJB's approach to managing its obligations with regards public records as set out in the Public Records (Scotland) Act 2011 is outlined in the IJB Records Management Plan.
- Staff are made aware of their obligations to protect client, patient and staff data.
 The NHS Scotland Code of Practice on Protecting Patient Confidentiality has been issued to all staff.
- Staff are also required to undertake annual mandatory training on information security.

Financial control

Responsibility for maintaining and operating an effective system of internal financial control rests with the Chief Finance Officer. The system of internal financial control is based on a framework of regular management information, Financial Regulations and Standing Financial Instructions, administrative procedures (including segregation of duties), management and supervision, and a system of delegation and accountability. Development and maintenance of these systems is undertaken by managers within the HSCP supported by NHSGGC and Renfrewshire Council in relation to the operational delivery of health and social care services.

Transformational change

The HSCP's medium term approach (Tier Two) to financial planning recognised the need to transform the way in which the HSCP delivers services, to ensure the sustainability of health and social care services going forward. COVID-19 significantly disrupted the IJB's delivery of its 2020/21 Financial Plan, requiring a re-evaluation and reprofiling of the delivery of approved in-year (Tier One) savings. Transformational (Tier Two) changes were disrupted and delayed; as was work to bring forward and develop a second tranche of savings for 2021/22 and beyond. Nonetheless, the IJB remained focussed on delivering the transformation programme and seeking to deliver targeted savings where necessary, focusing on mitigating the risk of financial instability. Accordingly, in the summer of 2020, the IJB approved the development of a Recovery and Renewal Programme. The programme builds on and supports our two-tier model for delivering financial sustainability.

COVID-19 Supplementary Governance Arrangements

The governance context in which the IJB operates has been impacted by the need to implement business continuity processes in response to the significant public health challenge presented by the COVID-19 Pandemic. In order to adapt to the challenge of planning and delivering health and social care services during the pandemic the IJB has had to adapt its governance structures accordingly.

During the first year of the pandemic a number of key meetings were established to enable regular dialogue on key and emerging issues. At Board level, this included the Strategic Executive Group (SEG) and Chief Officers (HSCP) Tactical Group to consider and agree arrangements for HSCPs and IJBs within the NHSGGC area. At a local level, an Emergency Management Team (EMT) was established by Renfrewshire Council and a Local Response Management Team (LRMT) was established by the HSCP.

As we moved into the second year of responding to the pandemic, the requirement for separate fora to manage issues regarding Covid-19 lessened as pandemic management actions were embedded fully in the day-to-day governance and operational management of the IJB, HSCP and our partners. As a result, the EMT and LRMT were stood down and were replaced by enhanced Local Authority Corporate Management Team (CMT) arrangements, and enhanced HSCP Senior Management Team (SMT) arrangements respectively, both of which were stepped up in frequency during surges of the virus. At the time of writing, the SEG and Chief Officers Tactical Group remain operational.

Additionally, the temporary decision-making arrangements approved by the IJB in March 2020, whereby authority is delegated, if required, to meet immediate operational demand, to the Chief

Officer in consultation with the Chair and Vice Chair of the IJB, were reinstated in January 2022 in response to the impact of the Omicron variant. These arrangements were in place until March 2022 however they were not required to be used.

Renfrewshire IJB continues to work with partners to participate in the wider response to the pandemic at Health Board and national level and is a key participant in the Council family and Greater Glasgow and Clyde governance structures working with other HSCPs to manage the impact of the pandemic.



Review of Adequacy and Effectiveness

The IJB has responsibility for conducting, at least annually, a review of effectiveness of the system of internal control and the quality of data used throughout the organisation. The review is informed by the work of the Senior Management Team (who have responsibility for the development and maintenance of the internal control framework environment), the work of the internal auditors and the Chief Internal Auditor's annual report, and reports from external auditors and other review agencies and inspectorates.

The review of the IJB's governance framework is supported by a process of self-assessment and assurance certification by the Chief Officer. The Chief Officer completes "Self-assessment Checklists" as evidence of review of key areas of the IJB's internal control framework, these assurances are provided to Renfrewshire Council and NHSGGC. The Senior Management Team has input to this process through the Chief Finance Officer. In addition, the review of the effectiveness of the governance arrangements and systems of internal control within the Health Board and Local Authority partners places reliance upon the individual bodies' management assurances in relation to the soundness of their systems of internal control. There were no internal control issues identified by the review.

Internal Audit undertakes an annual programme following an assessment of risk completed during the strategic audit planning process. The appointed Chief Internal Auditor provides an annual report to the Audit, Risk and Scrutiny Committee and an independent opinion on the adequacy and effectiveness of the governance framework, risk management and internal control.

Due to the nature of IJB Board Membership, a conflict of interest can arise between an IJB Board Members' responsibilities to the IJB and other responsibilities that they may have. The IJB has arrangements in place to deal with any conflicts of interest that may arise. It is the responsibility of Board and Committee Members to declare any potential conflicts of interest, and it is the responsibility of the Chair of the relevant Board or Committee to ensure such declarations are appropriately considered and acted upon.

The arrangements continue to be regarded as fit for purpose in accordance with the governance framework and the FM Code.

Roles and Responsibilities

The Chief Officer is the Accountable Officer for the IJB and has day-to-day operational responsibility to monitor delivery of integrated services, with oversight from the IJB.

The IJB complies with the CIPFA Statement on "The Role of the Chief Finance Officer in Local Government 2014". The IJB's Chief Finance Officer has overall responsibility for RHSCP's financial arrangements and is professionally qualified and suitably experienced to lead the IJB's finance function and to direct finance staff.

The IJB complies with the requirements of the CIPFA Statement on "The Role of the Head of Internal Audit in Public Organisations 2019". The IJB's appointed Chief Internal Auditor has responsibility for the IJB's internal audit function and is professionally qualified and suitably experienced to lead and direct internal audit staff. The Internal Audit service operates in accordance with the CIPFA "Public Sector Internal Audit Standards 2017".

Board members and officers of the IJB are committed to the concept of sound internal control and the effective delivery of IJB services. The IJB's Audit Risk and Scrutiny Committee operates in accordance with CIPFA's Audit Committee Principles in Local Authorities in Scotland and Audit Committees: Practical Guidance for Local Authorities.

The Committee's core function is to provide the IJB with independent assurance on the adequacy of the risk management framework, the internal control environment and the integrity of the financial reporting and governance arrangements.

Internal audit opinion

No system of internal control, nor Internal Audit, can provide absolute assurance. On the basis of audit work undertaken during the reporting period and the assurances provided by the partner organisations, the Chief Internal Auditor is able to conclude that a reasonable level of assurance can be given that the system of internal control, risk management and governance is operating effectively within the organisation.

Certification

On the basis of assurances provided, we consider that the internal control environment operating during the reporting period provides reasonable and objective assurance that any significant risks impacting upon the achievement of our principal objectives will be identified and actions taken to avoid or mitigate their impact. Systems are in place to continually review and improve the internal control environment and the following action plan is in place to identify areas for improvement.

Action Plan

Following consideration of the review of adequacy and effectiveness the following action plan has been agreed to ensure continual improvement of the IJB's governance. Regular updates on progress of the agreed actions will be monitored by the IJB Audit, Risk and Scrutiny Committee.

A copy of the agreed Action Plan is included in the following table:

Agreed Action	Responsible Person	Date
Develop the Strategic Delivery Plan for Year 1 of the Strategic Plan - informed by relevant Care Planning Groups – setting out success measures and milestones, to evidence how the agreed strategic objectives will be progressed each year.	Head of Strategic Planning and Health Improvement	June 2022
Develop a new three-year workforce plan to help address challenges in recruitment and retention, providing detail on how the IJB will endeavour to ensure that the workforce is adequately resourced and has the qualifications, knowledge, skills and resilience required to deliver safe, fit for purpose services that deliver real improvements to the health and wellbeing of Renfrewshire's population.	Head of Strategic Planning and Health Improvement	October 2022

Update on 2020/21 Action Plan

Agreed Action	Progress	Responsible Person	Date
Further the implementation of the IJB's Risk Management Framework through delivery of risk management training with the IJB Audit, Risk and Scrutiny Committee.	Risk management training was delivered to the IJB Audit, Risk and Scrutiny Committee (and additional IJB members who wished to attend) in November 2021. The timing of the training reflected wider work being undertaken to embed the framework, and availability of key staff.	Head of Strategic Planning and Health Improvement	Complete
Work with the Strategic Planning Group to develop and consult on an updated Strategic Plan 2022-25, reflecting the impact of COVID and the need for flexibility within the current policy environment, for IJB approval in March 2022.	Renfrewshire HSCP's Strategic Plan for 2022-25 was approved by the IJB in March 2022. Our new plan reflects the COVID-19 response and the impact of the pandemic across our communities, and of how the HSCP has worked flexibly to re-focus our priorities to adapt to the needs of the rapidly changing environment. The Plan looks to continue to progress those priorities which have increased in importance in the last two years. We have taken a different approach to identifying our objectives in the new Plan, focusing on a range of themes	Head of Strategic Planning and Health Improvement	Complete

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	which underpin how we deliver services, rather than looking at individual service areas themselves. We have also sought to place equalities and lived and living experience at the heart of our Plan. The new Plan has been developed through engagement and consultation with Care Groups and our wider communities.		
Update the HSCP Medium Term Financial Plan to account for the ongoing impact of COVID-19, aligning where possible to the recommendations in the Independent Review of Adult Social Care, and link to the refreshed HSCP Strategic Plan.	The IJB's new Medium Term Financial Plan (MTFP) 2022-25 was approved in March 2022. The new Plan reflects the impact of COVID-19 and other emerging issues facing the IJB. It seeks to outline the specific service and funding issues over the next three-year period and how the IJB will work towards achieving financial sustainability and resilience, whilst delivering its priorities. As with the new Strategic Plan, the MTFP aims to be cognisant of, and responsive to, the national context. This includes both considerations around policy and the public health emergency caused by the COVID-19 pandemic.	Chief Finance Officer	Complete
As set out in our Strategic Plan 2019- 2022 we will further the establishment of unified quality care and professional governance arrangements.	As outlined in our Quality, Care and Professional Governance annual report 2020/21 (published Sept 21) Renfrewshire HSCP has successfully continued to further the establishment of unified quality, care and professional governance arrangements. Throughout the pandemic Renfrewshire HSCP have sought to continue services wherever possible, adapting to reflect the most effective way of working with patients and service users. New arrangements have been necessary to strengthen oversight of care homes and help care providers deal with pandemic pressures. We will continue to work in a way that fosters continuous improvement in clinical, quality and safety at all times.	Chief Finance Officer	complete

	we will ensure safe and effective		
	quality care has a focus on		
	management of risk, of improving care		
	and delivering better outcomes.		
Assess the implications	The IJB approved a response to the	Chief Officer	Ongoing
of agreed	National Care Service Consultation in		
recommendations taken	October 2021.		
forward following the			
Independent Review of	Analysis of the consultation was		
Adult Social Care	published in February 2022 and		
(Feeley Review), with a	indicated that overall, a majority are		
particular focus on	broadly supportive of the proposals. It		
implications for IJB	is expected that draft legislation will be		
governance, and	introduced within the Scottish		
provide regular	Parliament in Summer 2022.		
assessments to the IJB.			
	In anticipation of the progression of		
	these plans, Renfrewshire HSCP has		
	created a number of posts to help		
	support us to deliver on the		
	recommendations and the next stages		
	of the wider NCS proposals as they are		
	taken through parliament.		

Update on 2019/20 Action Plan

Agreed Action	Progress	Responsible Person	Date
Reprofile scheduling of 2020/21 savings targets and transformational activity for period to 2022/23 in response to COVID-19 crisis and implement robust programme and benefits management to ensure continued financial control.	By end March 2022, all outstanding approved savings had been successfully delivered. Further scoping work will take place in early 2022/23 to determine the transformation projects of greatest strategic importance for the IJB and the communities it serves.	Chief Finance Officer	September 2022
Implement standing agenda item at each IJB Audit, Risk and Scrutiny Committee to provide update on transformational activity and benefits management in line with above reprofiling.	As previously noted, our Transformation Programme was paused in March 2020 to enable the HSCP to focus on critical and essential services. Prioritisation of transformational activity will now occur in September 2022 and updates to the Audit, Risk and Scrutiny Committee will	Chief Finance Officer	Updated timescale: September 2022

Put in place a plan to review, on a rolling basis, IJB key governance documents, including for example Standing Orders, Scheme of Delegation and Financial Regulations.	commence at this point, with a view to delivery of key transformational activity by end March 2024. Key governance documents are reviewed on an ongoing basis, as required, and considered through the IJB's Audit, Risk and Scrutiny Committee and/or the IJB, as appropriate. Work is underway to take forward the development of an updated Scheme of Delegation for the IJB that explicitly sets out the arrangements that are in place regarding delegations to officers and those that remain within the remit and responsibility of the parent organisations.	Head of Strategic Planning & Health Improvement	Ongoing
Working with NHSGGC and the five other GGC HSCP's, develop commissioning plans in relation to acute setaside resources.	In September 2021 the IJB received a report on the Board-wide draft Unscheduled Care Joint Commissioning Plan, which was subsequently agreed by the other five HSCPs in NHSGGC. The final version of the HSCP-led NHSGGC Unscheduled Care Joint Commissioning Plan was presented to the IJB in March 2022.	Head of Health and Social Care (Paisley)	Complete

Update on 2018/19 actions

Agreed Action	Progress	Responsible Person	Date
Implement Ministerial Steering Group Review of Integration Proposals and Self Actions identified to be delivered over 2019/20, including: the development of commissioning plans to support the implementation of the set aside arrangements; working closely with the IJB and the Director of Finance for NHSGGC to ensure that all possible	As above, the final version of the HSCP-led NHSGGC Unscheduled Care Joint Commissioning Plan was presented to the IJB in March 2022. Contained within the Plan was a Financial Framework to support its delivery, developed in partnership with all six IJBs and the NHSGGC Board.	Head of Health and Social Care (Paisley)	Complete

steps are taken to enable the IJB to approve the delegated health budget prior to the start of the financial year.			
Carry out a review of the Renfrewshire Integration Scheme in line with the Public Bodies (Joint Working) (Scotland) Act 2014)	At the time of writing, work is ongoing between Renfrewshire Council, the other five Local Authorities within Greater Glasgow and Clyde and NHSGGC to confirm the timescales for consultation, and subsequent approval of, Integration Schemes. The existing Integration Scheme will remain in place until this time.	Chief Officer	Ongoing

Conclusion and Opinion on Assurance

While recognising the importance of continuous improvement, as detailed above, it is our opinion that reasonable assurance can be placed upon the adequacy and effectiveness of the IJB's governance arrangements.

We consider that the internal control environment provides reasonable and objective assurance that any significant risks impacting on the IJB's principal objectives will be identified and actions taken to avoid or mitigate their impact.

Systems are in place to regularly review and improve the internal control environment and the implementation of the action plan will be monitored by the HSCP Senior Management Team throughout the year.

John Matthews OBE, Chair, Renfrewshire Integration Joint Board	Date:
Christine Laverty, Chief Officer Date:	