



**LIVERPOOL
CITY REGION**
COMBINED AUTHORITY



METROMAYOR
LIVERPOOL CITY REGION

Code of Corporate Governance



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1. Purpose

- 1.1 It is the responsibility of the Liverpool City Region Combined Authority (LCRCA) and Merseytravel (hereafter referred to as “the organisations”) to establish, and maintain under regular review, governance arrangements which are robust, appropriate and effective.
- 1.2 The purpose of this Code of Corporate Governance (hereafter referred to as the “Code”) is to demonstrate how the organisations demonstrate good governance.
- 1.3 The adoption of a Code is a key requirement of the relevant Statement of Recommended Practice: *Delivering Good Governance in Local Government*, (CIPFA/SOLACE, 2016) (hereafter referred to as “the guidance”) and this Code reflects how the principles embodied within this guidance have been adopted by the organisations.
- 1.4 The adoption of, and compliance with, the Code is also one of the key areas for comment in the Annual Governance Statement (AGS), which the organisations are each required to produce and publish under the Accounts and Audit Regulations 2015 (regulation 6(1)(a)). The Annual Governance Statement is produced by the Director of Corporate Services and is based upon a ‘review of effectiveness’ incorporating a number of sources of assurance, primarily: the work of Internal Audit and other providers of assurance, and through provision of assurance from management; all of which provide a commentary on how robust and consistently applied the governance framework is in practice.
- 1.5 All staff have a key role to play in demonstrating good governance, and so should be aware of this Code and should seek to demonstrate the principles embodied within it in their work, in conjunction with the Corporate Behaviours: LCR First, Action Focus and Respect.

2. Definitions

- 2.1 The guidance defines corporate governance as that which “*comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved*” (CIPFA/SOLACE, 2016).
- 2.2 In order to demonstrate good corporate governance, the organisations should carry out their functions in a way that demonstrates accountability, transparency, effectiveness, integrity, and inclusivity. This means doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner.
- 2.3 This links directly to the Principles of Public Life, known as the Nolan Principles, which all public servants are expected to demonstrate in their work. The

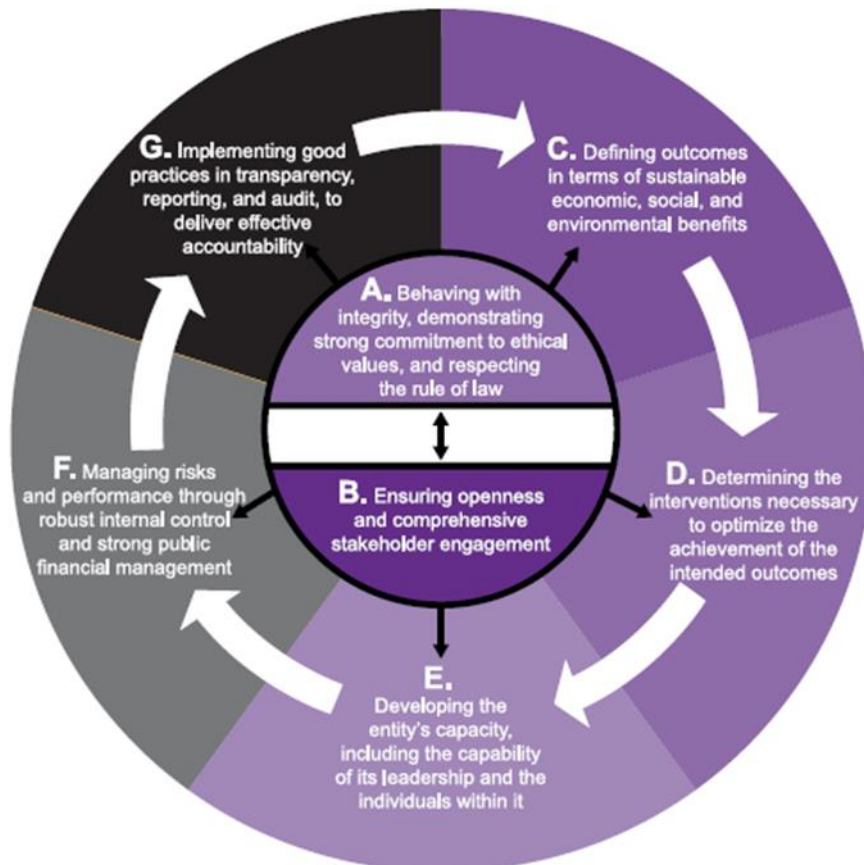
Committee on Standards in Public Life defines the principles as detailed in the table below:

Principle	Definition
 <p>Selflessness</p>	<p>Holders of public office should act solely in terms of the public interest.</p>
	<p>Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.</p>
	<p>Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.</p>
	<p>Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.</p>
	<p>Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.</p>
	<p>Holders of public office should be truthful.</p>
	<p>Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.</p>

3. The Principles of Good Governance

3.1 The guidance sets out seven Core Principles that detail the key requirements for the governance of the organisation. These are illustrated in the diagram below:

Achieving the Intended Outcomes While Acting in the Public Interest at all Times



Source: *Delivering Good Governance in Local Government* (CIPFA/SOLACE, 2016)

3.2 Under each of the Core Principles detailed in the diagram, the guidance sets out a number of supporting principles which detail how the organisations should demonstrate good governance.

4. Applying the Principles of Good Governance

4.1 In order to achieve good governance, the organisations will seek to apply each of the seven Core Principles, along with their Sub-Principles, and this is demonstrated via the supporting evidence detailed in the table below:

Core Principle	Sub-Principles	Requirements	Supporting Evidence
A. Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of the law	Behaving with integrity	<ul style="list-style-type: none"> Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles) Leading by example and using the behaviours and values as a framework for decision making and other actions Demonstrating, communicating and embedding the behaviours or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively 	<ul style="list-style-type: none"> Clear set of approved Corporate Behaviours. LCRCA Constitution and Merseytravel Constitution. Employee Ethics Policy. Officer Code of Conduct. Member Code of Conduct (updated June 2021) supported by co-ordinated provision of training September 2021. Individual Performance Plan (IPP) process. Fraud, Bribery and Corruption Policy; and associated Policy Framework: Anti Bribery Policy; Anti Money Laundering Policy; Confidential Reporting (Whistle-blowing) Policy; Investigation Protocol; Surveillance Policy. Declarations of Interest process by employees and Members. Gifts and Hospitality Policy. IT Acceptable Use Policy. IT Security Policy.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
			<ul style="list-style-type: none"> • Public access to relevant meetings (including online public viewing – webcasting, and availability of meeting agendas and minutes). • Freedom of Information and Environment Regulations Policy. • Publication Scheme. • Grievance Policy. • Corporate induction/staff handbook. • Cultural architects and change catalysts in place. • I4P system utilised to issue all new and revised policies to staff and monitor completion. • E-learning.
	<p>Demonstrating strong commitment to ethical values</p>	<ul style="list-style-type: none"> • Seeking to establish, monitor and maintain the organisation’s ethical standards and performance • Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation’s culture and operation • Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values • Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with ethical standards expected by the organisation 	<ul style="list-style-type: none"> • Corporate Plan. • Clear set of approved Corporate Behaviours. • Employee Ethics Policy. • Officer Code of Conduct. • Member Code of Conduct • LCRCA Constitution and Merseytravel Constitution. • Dignity at Work Policy. • Social Value Group (and development of a Social Value Policy). • Contract Procedure Rules incorporating social value considerations • Corporate induction/staff handbook.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
	Respecting the rule of law	<ul style="list-style-type: none"> Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations Creating the conditions 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 Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders Dealing with breaches of legal and regulatory provisions effectively Ensuring corruption and misuse of power are dealt with effectively 	<ul style="list-style-type: none"> LCRCA Constitution and Merseytravel Constitution. Legal team providing general support to officers; specialist advice, where required; and available for input at all Committee meetings. Monitoring officer in place (review of reports and associated advice). Individual Performance Plan (IPP) process Declarations of Interest process by employees and Members. Gifts and Hospitality Policy. Section in Committee reports to consider legal and risk implications. Review of reports via Modern.Gov and Legal sign off required for all delegated decisions and Committee reports. Call-in procedure. Consideration of the need for Section 5 reports under the Local Government Housing Act 1989
B. Ensuring openness and comprehensive stakeholder engagement	Openness	<ul style="list-style-type: none"> Ensuring an open culture through demonstrating, documenting and communicating the organisation's commitment to openness Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is 	<ul style="list-style-type: none"> Public access to relevant meetings. Standard format for committee reports. Overview and Scrutiny Committee. Public consultations. Statement of Accounts. Freedom of Information and Environment Regulations Policy. Publication Scheme.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<p>not the case, a justification for the reasoning for keeping a decision confidential should be provided</p> <ul style="list-style-type: none"> • Providing 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 • Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/ courses of action 	<ul style="list-style-type: none"> • Annual Governance Statement. • Equality Impact Assessment Toolkit. • Publishing full business cases of projects supported by the Strategic Investment Fund (SIF) as well as regular updates on other decisions taken. • Defined Assurance Framework and Investment Strategy in place for SIF projects • Defined Assurance Framework in place for AEB service • Authors of formal reports seek to identify options and alternatives, and weigh up considerations. • Briefings of relevant lead members in place. • Member induction and training.
	Engaging comprehensively with institutional stakeholders	<ul style="list-style-type: none"> • Effectively engaging 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 • Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively • Ensuring that partnerships are based on: <ul style="list-style-type: none"> ○ trust 	<ul style="list-style-type: none"> • Corporate Plan. • Local Enterprise Partnership. • The Audit, Risk and Governance Board has an independent chair and a further independent member. Audit and Governance Committee has an independent member. • Stakeholder engagement in relation to transport delivery. • Stakeholder engagement about what the LCRCA does and how it benefits the local area. • Transport Advisory Group in place. • Growth Directors???

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<ul style="list-style-type: none"> ○ a shared commitment to change ○ a culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit 	<ul style="list-style-type: none"> ● Results of Transport Focus surveys inform aims of Bus Alliance. ● Stakeholder consultation regarding the Local Industrial Strategy. ● LCR Listens. ● Building Back Better economic recovery plan utilising stakeholder engagement.
	Engaging with individual citizens and service users effectively	<ul style="list-style-type: none"> ● Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve communities, individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes ● Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement ● Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs ● Implementing effective feedback mechanisms in order to demonstrate how views have been taken into account 	<ul style="list-style-type: none"> ● Corporate Plan. ● LCR Listens. ● Public consultations. ● Health and Safety Policy. ● Communications Team. ● Overview and Scrutiny Committee. ● LCRCA Constitution and Merseytravel Constitution. ● Equality Impact Assessment Toolkit. ● Stakeholder engagement in relation to transport delivery. ● Merseytravel welcomes public participation in formal meetings through the facility for public petitions and questions. ● Stakeholder engagement in relation to bus services. ● Stakeholder engagement about what the LCRCA does and how it benefits the local area. ● Customer insight informs marketing campaigns. ● Transport Advisory Group in place.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<ul style="list-style-type: none"> Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity Taking account of the impact of decisions on future generations of tax payers and service users 	<ul style="list-style-type: none"> Growth Directors??? Results of Transport Focus surveys inform aims of Bus Alliance. Stakeholder consultation regarding the Local Industrial Strategy. Corporate commercial agreements in place with Stadler, Merseyrail and Network Rail in relation to the Rolling Stock project, working positively in a collaborative manner and the wider Merseyrail network and services Bus Alliance in place to encourage common shared view and continuous improvement in bus services. Relationship/governance arrangements with Local Enterprise Partnership (LEP).
C. Defining outcomes in terms of sustainable economic, social and environmental benefits	Defining outcomes	<ul style="list-style-type: none"> Having a clear vision, which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the organisation's overall strategy, planning and other decisions Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer Delivering defined outcomes on a sustainable basis within the resources that will be available 	<ul style="list-style-type: none"> Corporate Plan. Service Plans in place to translate corporate objectives into service objectives. Clear set of approved Corporate Behaviours. Risk Management Policy and associated Risk Registers. Revision of the report template to reflect social value etc

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<ul style="list-style-type: none"> Identifying and managing risks to the achievement of outcomes Managing expectations effectively with regard to determining priorities and making the best use of the resources available 	
	Sustainable economic, social and environmental benefits	<ul style="list-style-type: none"> Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints Determining 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 Ensuring fair access to services 	<ul style="list-style-type: none"> Corporate Plan. Annual Governance Statement. Finance monitoring reports. Public consultations. Social Value Group (and development of a Social Value Policy). Contract Procedure Rules incorporate social value considerations. Environmental Policy. Strategic Investment Fund (SIF) Assurance Framework. LCRCA has approved long-term strategies for Rail, Bus, short journeys and Tunnels. Integration of evidence and policy teams has allowed better evidential decisions, and integration of decision-making and forward planning across policy teams. Development of Local Industrial Strategy. Spatial Development, Housing and Air Quality policies under development. Mayor's vision and aims communicated through regular briefings and communications. Relevant financial, social and environmental

Core Principle	Sub-Principles	Requirements	Supporting Evidence
D. Determining the interventions necessary to optimise the achievement of the intended outcomes	Determining interventions	<ul style="list-style-type: none"> Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore ensuring best value is achieved however services are provided Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts 	<p>and risk considerations have to be included within Committee/Board reports.</p> <ul style="list-style-type: none"> Public consultations – including options appraisal. Business case evaluations. Strategic Investment Fund (SIF) Assurance Framework. Medium Term Financial Strategy.
	Planning interventions	<ul style="list-style-type: none"> Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered Considering and monitoring risks facing each partner when working collaboratively, including shared risks Ensuring arrangements are flexible and 	<ul style="list-style-type: none"> Corporate Plan. Service Plans. Team Plans. Individual Performance Plan (IPP) process. Risk Management Policy. Business Continuity Policy (and associated plans). Public consultations. Strategic Investment Fund (SIF) Assurance Framework. LCRCA Constitution and Merseytravel Constitution.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<p>agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances</p> <ul style="list-style-type: none"> Establishing appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured Ensuring capacity exists to generate the information required to review service quality regularly Preparing budgets in accordance with objectives, strategies and the medium term financial plan Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy 	<ul style="list-style-type: none"> Delegated decisions system in place to record rationale and approval of decisions within delegated authority. Briefings by Metro Mayor and senior leaders. Regular briefings to members on the Rolling Stock project. Operational and Executive Programme Boards in place for Rolling Stock project, with dashboard reports presented to these. Social Value Group (and development of a Social Value Policy). Contract Procedure Rules incorporating social value considerations. Continued management of delivery of required outputs under Devolution Deal. Service Area Measures defined and reported throughout the year with remedial actions being put in place where this is falling below target. Customer feedback obtained regarding transport and used to feed into plans and working with providers, e.g. Bus Alliance.
	<p>Optimising achievement of intended outcomes</p>	<ul style="list-style-type: none"> Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term 	<ul style="list-style-type: none"> Corporate Plan. Medium Term Financial Strategy. LCRCA Constitution and Merseytravel Constitution. Social Value Group (and development of a Social Value Policy). Contract Procedure Rules incorporating social value considerations.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<ul style="list-style-type: none"> Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage Ensuring the achievement of 'social value' through service planning and commissioning 	
E. Developing the entity's capacity, including the capability of its leadership and the individuals within it	Developing the entity's capacity	<ul style="list-style-type: none"> Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently Recognising the benefits of partnerships and collaborative working where added value can be achieved Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources 	<ul style="list-style-type: none"> Corporate Plan. Service Plans. Team Plans. Recruitment and Selection Policy. Appropriate capacity maintained and developed so as to meet the needs of the organisation.
	Developing the capability of the entity's	<ul style="list-style-type: none"> Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding 	<ul style="list-style-type: none"> LCRCA Constitution and Merseytravel Constitution. Corporate Plan.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
	<p>leadership and other individuals</p>	<p>their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained</p> <ul style="list-style-type: none"> • Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body • Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's authority • Developing the capabilities of members and senior management to achieve effective leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by: <ul style="list-style-type: none"> ○ ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and 	<ul style="list-style-type: none"> • Service Plans. • Team Plans. • Individual Performance Plan (IPP) process. • Regular Heads of Service and Directors meetings held along with Management Conferences. • Learning and Development Procedure. • Employee Assistance Programme. • Attendance at Work Policy. • Job descriptions in place. • Management/1:1 meetings in place. • Corporate induction/staff handbook. • Member training and briefings in place. • Chief Executive and Metro Mayor briefings for staff. • Health and Safety Policy.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<p>encouraged</p> <ul style="list-style-type: none"> ○ ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis ○ ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external ● Ensuring that there are structures in place to encourage public participation ● Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections ● Holding staff to account through regular performance reviews which take account of training or development needs ● 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 	

Core Principle	Sub-Principles	Requirements	Supporting Evidence
<p>F. Managing risks and performance through robust internal control and strong public financial management</p>	<p>Managing risk</p>	<ul style="list-style-type: none"> • Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making • Implementing robust and integrated risk management arrangements and ensuring that they are working effectively • Ensuring that responsibilities for managing individual risks are clearly allocated 	<ul style="list-style-type: none"> • Risk Management Policy. • Risk Group. • Corporate and Transport Risk Registers. • Service Risk Registers. • Risk management training sessions. • Sessions with Directors to identify key risks and produce fully updated Corporate Risk Registers. • Inclusion of risk management considerations in all Committee reports.
	<p>Managing performance</p>	<ul style="list-style-type: none"> • Monitoring service delivery effectively including planning, specification, execution and independent post implementation review • Making 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 • Ensuring an effective scrutiny or oversight function is in place which provides constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the organisation’s performance and that of any organisation for which it is responsible 	<ul style="list-style-type: none"> • Corporate Plan. • Business Continuity Policy (and associated plans). • Overview and Scrutiny Committee • Committee reports and Member briefings. • Performance Management Framework. • Medium Term Financial Strategy. • LCRCA Constitution and Merseytravel Constitution.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<ul style="list-style-type: none"> • Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement • Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements) 	
	Robust internal control	<ul style="list-style-type: none"> • Aligning the risk management strategy and policies on internal control with achieving objectives • Evaluating and monitoring risk management and internal control on a regular basis • Ensuring effective counter fraud and anti-corruption arrangements are in place • Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor • Ensuring the audit committee which is independent of the executive and accountable to the governing body: <ul style="list-style-type: none"> ○ provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment ○ that its recommendations are 	<ul style="list-style-type: none"> • Corporate Plan. • Service Plans. • Corporate and Transport Risk Registers. • Service Risk Registers. • Risk Management Policy. • Annual Governance Statement and supporting review. • Internal Audit review of risk management. • Internal Audit Annual Audit Plan. • Head of Internal Audit – Annual Report and Opinion. • Head of Internal Audit – regular reports to Audit and Governance Committee and Audit, Risk and Governance Board. • Fraud, Bribery and Corruption Policy; and associated Policy Framework • Policies cover how to report a suspected fraud. • Whistleblowing policy in place and staff have accepted via I4P. • Fraud Awareness training available as an e-learning package.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<p>listened to and acted upon</p>	<ul style="list-style-type: none"> • Fraud awareness campaigns – such as Fraud Awareness Week. • Internal Audit proactive counter-fraud work carried out and Fraud Risk Register in place. • Participation in the National Fraud Initiative (NFI).
	<p>Managing data</p>	<ul style="list-style-type: none"> • Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data • Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies • Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring 	<ul style="list-style-type: none"> • Data Protection Policy. • CCTV Code of Practice. • Freedom of Information • Environment Regulations Policy. • Publication Scheme. • Records Management Policy and Procedures. • Off-site Records Retrieval Guidance. • Record Retention Schedule and Guidance. • Corporate Retention Policy in place • Social Media Policy. • IT Acceptable Use Policy. • IT Security Policy. • PCI Compliance Policy. • Data Protection/GDPR training including e-learning packages being available. • Portal for reporting data breaches maintained. • SIMO and SIRO in place. Annual self-assessment undertaken in relation to the role of SIRO (utilising the governance requirements detailed in Local Public Services Data Handling Guidelines 5th Edition, April 2018).

Core Principle	Sub-Principles	Requirements	Supporting Evidence
			<ul style="list-style-type: none"> • Corporate Retention Policy in place. • Physical controls in place to protect data held in paper format. • Electronic system access controls in place. • Information Asset Registers in place.
	Strong public financial management	<ul style="list-style-type: none"> • Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance • Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls 	<ul style="list-style-type: none"> • LCRCA Constitution and Merseytravel Constitution. • Medium Term Financial Strategy. • Budget monitoring and reporting. • Monthly budget monitoring statements received by Heads of Service and discussions held. • Financial information available via Agresso access. • Financial implications of decisions included within Committee reports and Delegated Decisions, both of which require Finance sign off. • Agresso authorisation levels and delegated authority in place. • Income reconciliation at source within high volume transactional areas. • Medium Term Financial Strategy. • Budget proposals shared with Transport Committee and Overview and Scrutiny Committee to allow consideration and scrutiny prior to formal approval. • Finance consideration and sign off required for reports to LCRCA and to Merseytravel – facilitates robust discussion regarding

Core Principle	Sub-Principles	Requirements	Supporting Evidence
			financial implications of decisions. <ul style="list-style-type: none"> Annual self-assessment undertaken in relation to the role of the Chief Financial Officer in Local Government (utilising CIPFA document 'The Role of the Chief Financial Officer in Local Government' 2016).
G. Implementing good practices in transparency, reporting and audit to deliver effective accountability	Implementing good practice in transparency	<ul style="list-style-type: none"> Writing and communicating reports for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand 	<ul style="list-style-type: none"> Public access to relevant meetings. Standard committee report template. Heads of Service have responsibility for ensuring data on website and intranet is up to date. Limited number of reports identified as being wholly part 2 most are identified as being partially part 2 to satisfy transparency requirements
	Implementing good practices in reporting	<ul style="list-style-type: none"> Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way Ensuring members and senior management own the results reported Ensuring robust arrangements for assessing the extent to which the principles contained in this Code have been applied and publishing the results on this assessment, including an action 	<ul style="list-style-type: none"> Review of Committee reports by a range of officers to ensure that issues are expressed clearly. Members then scrutinise the reports and ask questions. Consideration of internal audit work at LCRCA Audit and Governance Committee, and Merseytravel Audit, Risk and Governance Board. Annual Governance Statement. Statement of Accounts. Risk Group.

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<p>plan for improvement and evidence to demonstrate good governance (the annual governance statement)</p> <ul style="list-style-type: none"> • Ensuring that this Framework is applied to jointly managed or shared service organisations as appropriate • Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations 	
	Assurance and effective accountability	<ul style="list-style-type: none"> • Ensuring that recommendations for corrective action made by external audit are acted upon • Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon • Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations • Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement • Ensuring that when working in partnership, arrangements for 	<ul style="list-style-type: none"> • External Audit Reports to LCRCA Audit and Governance Committee and Merseytravel Audit, Risk and Governance Board. • Internal Audit Annual Audit Plan. • Head of Internal Audit – Annual Report and Opinion. • Head of Internal Audit – regular update reports to LCRCA Audit and Governance Committee and Merseytravel Audit, Risk and Governance Board. • Compliance with Public Sector Internal Audit Standards. • Annual Governance Statement. • Corporate Plan. • Strategic Investment Fund (SIF) Assurance Framework. • Self-assessment undertaken in relation to the role of the Head of Internal Audit in

Core Principle	Sub-Principles	Requirements	Supporting Evidence
		<p>accountability are clear and the need or wider public accountability has been recognised and met.</p>	<p>Public Sector Organisations (utilising CIPFA document 'The role of the Head of Internal Audit in Public Sector Organisations' 2019 edition).</p> <ul style="list-style-type: none"> • Risk-based Internal Audit Plan. • Annual bus survey used to shape service going forward. • Annual Conversation – positive relationship with government in place and developing. • Ferries Domestic Safety Management external review. • All reports require approvals from Head of Service/Assistant Director/Executive Director, to enable any issues of clarity or accuracy to be challenged or questioned.