Minutes of the 51st Meeting of the
Office for Legal Complaints Audit and Risk Committee
Wednesday 6 October 2021

Members Present:

Harindra Punchihewa, Chair,

Annette Lovell

Alison Sansome

Martin Spencer

In attendance

Elisabeth Davies, OLC Chair – observing

Paul McFadden, Chief Ombudsman

Michael Letters, Head of Finance

Laura Stroppolo, Head of Programme Management and Assurance

Leona Awoyele, Ministry of Justice (items 4 to 10)

Jorjie Woodroffe, Government Internal Audit Agency

Matt Ellis, Government Internal Audit Agency

Ella Firman, National Audit Office

Katrina Bell, Policy Associate, Legal Service Board

Jonathan Davies, Risk Manager (item 4)

David Anderson, Head of IT (items 6, 11,12 and 13)

Apologies:

Sandra Strinati, Chief Operating Officer

Alison Wedge, Ministry of Justice

Matthew Hill, CEO, Legal Services Board

Alex Clarke, National Audit Office

Board Secretary:

Kay Kershaw

Item 1 – Welcome, Apologies and Preliminary Matters

1. The Chair welcomed all those in attendance and specially introduced and welcomed the new members to the committee.

2. Apologies were noted.

3. The meeting was quorate.

4. There were no declarations of interest reported.

Item 2 – Previous Minutes

5. ARAC **approved** the minutes of the meetings held on 6 May 2021 and 1 July 2021 as an accurate record of the meeting.

Item 3 – Previous Actions

6. ARAC **noted** the update on actions arising from previous meetings.

Item 4 – Risk Assurance review

7. ARAC considered a detailed paper setting out the latest position on strategic issues and risks, and the progress being made on enhancing the Risk and Assurance Framework. ARAC's attention was drawn to the following key points:

   - SI01 – PAP Backlog.

     The score for this strategic issue remains unchanged. Progress was being made on delivering a range of initiatives to reduce the PAP backlog going forward which in turn would reduce the score for this strategic issue in the future.

   - SI02 – Framework of Governance.

     Since issuing the Risk Assurance paper, further progress had been made on progressing the actions arising from the Corporate Governance Audit relating to internal governance structures.

     This strategic issue was now owned by the Head of Programme Management and Assurance, who advised that a Framework of Governance was to be drafted in Q3. It was expected that this strategic issue would be closed and tracked as a risk once the Framework of Governance had been completed.

     The Executive was considering a proposal to re-purpose the Management Team to ensure better use of time and resource.

     All Corporate Governance Audit actions had been closed within the agreed timescales.

   - SIO4 – Managing Transformation and Change

     This strategic issue was now owned by the Head of Programme Management and Assurance.

- SR01 – Failure to deliver against performance trajectory and consequent loss of credibility and confidence in LeO's ability to deliver the scheme effectively in the long term.

  The score for this risk remained unchanged. An action plan was being developed to address this risk and work was progressing to improve the robustness of LeO's forecasting model .

- SR02 – Inability to attract, engage, mobilise and retain the right talent, skills at all levels and embed the desired culture.

  The score for this risk remained unchanged due to the ongoing recruitment challenges faced by LeO. To mitigate this risk, an attraction strategy was being developed by the Head of People Strategy and Performance.

- SR03 – Lack of resilience at a senior level.

  This risk score had reduced following recruitment to several corporate roles during the first six months of the year, which had strengthened senior level resilience. Considering the ongoing recruitment challenges faced by LeO, and the high number of corporate roles that were single points of failure, this risk would continue to be closely monitored.

  An Internal Communications Manager had been appointed on a fixed term contract, bring resilience to the External Affairs Team.

  Recruitment for a Quality Manager was ongoing, after two unsuccessful recruitment rounds. The Executive was open to this appointment being on a permanent, fixed term or interim basis.

- SR04 – Failure to effectively manage and implement transformational change.

  The ownership of this risk had been transferred to the Head of Programme Management and Assurance who would be working closely with the Risk Manager, to ensure that the right mitigating actions were in place to manage this risk.

  A Programme Manager would commence in post of 1 November and would work closely with the Internal Communications Manager to improve the way change and transformation was managed and communicated across the organisation.

- SR05 – Covid-19 evolution; lack of resilience and agility to deliver our service

  The score for this risk remained unchanged because of the unknown factors associated with Covid-19. The Executive was continuing to engage with staff as it developed an appropriate hybrid working model.

- Financial Governance

  The Executive was currently managing an underspend. The Head of Finance and the Risk Manager were working closely to ensure that the actions to mitigate the underspend were being tracked as an issue. An update on this would be provided in the January 2022 ARAC papers.

- Casework Compliance Audit

  One low rated action arising from the Casework Compliance audit remained outstanding due to resource constraints within the Quality Team. In agreement with GIAA and the ARAC Chair, this action was to be paused until a Quality Manager had been recruited.

- Financial Management Audit

  A response was awaited from the MoJ following a request for guidance on actions relating to two procurement policy recommendations arising from this audit. These actions were overdue but could not be progressed until the MoJ response had been received.

- Workforce Planning Audit

  An action to produce technical documentation for the forecasting model would now be progressed following the appointment of a Business Intelligence Manager.

8. Having noted the absence of a strategic risks on cyber security, data loss and information management, ARAC was advised that these risks were captured as a business unit risks and were managed proactively at Management Team level and at the Security Forum which was attended by the Information Asset Owners.

9. Following discussion, the Head of Finance **agreed** to report on the business unit cyber security risk at future ARAC meetings.

   ACTION: The Head of Finance to report on the business unit cyber security, data loss and information management risks at future ARAC meetings.

10. Having reviewed that strategic issues and strategic risks, ARAC had been concerned to note that some mitigating actions were overdue, some risk scores had remained static in Q1 and Q2 and target risk scores for Q3 and Q4 had not been specified. The Committee sought to understand when planned mitigating actions would have an impact on reducing risk scores and what the implications of overdue mitigating actions would be on risk exposure in Q3 and Q4.

11. In response, ARAC was advised that risk scores in Q3 and Q4 were expected to reduce following the successful completion of planned mitigating actions. However, some of the mitigating actions would take longer to have an impact, such as those associated with the strategic issues and strategic risks linked to the Pre- Assessment Pool (PAP) backlog and the improvement trajectory. Some of these actions were overdue and could not be progressed until productivity had improved; until then, the Executive would not be comfortable reducing the risk scores.

12. The impact of mitigating actions on risk scores would be continually monitored and assessed and the scores would be adjusted when it was appropriate to do so. In circumstances where mitigating actions were having little or no impact on reducing risk scores, the Executive would reconsider the action with a view to identifying one that was more effective.

13. The Executive was urged to expedite work to reduce those risk scores that had not reduced in Q1 and Q2.

14. In response to a suggestion put forward by the CO, ARAC was in support of an accompanying narrative being included in the Risk Assurance report to help the Committee better understand the timeframes for mitigating actions to have an impact on improving risk scores and ratings.

ACTION: Risk owners to include an accompanying narrative in the Risk Assurance report to explain the timeframes for mitigating actions to have an impact on improving risk scores and ratings.

15. Reflecting on LeO's recruitment challenges, ARAC acknowledged that the lack of resource was a significant ongoing factor underpinning the organisation's ability to deliver mitigating actions that would reduce strategic risk scores.

16. Considering the number of operational risks with high risk scores, and the potential implications of this on strategic risks, the ARAC Chair asked for an update at the next meeting to assure the Committee that operational risks were in control and that their risk ratings were reducing.

ACTION: The Risk Manager to report on operational risks at the next ARAC meeting to provide assurance to the Committee that they were in control and that their risk ratings were reducing.

17. Considering the importance of adopting an aggressive level of risk management and the need to pro-actively manage risks that were not reducing, the Committee reflected on the level of risk it was prepared to accept. In discussion, the ARAC Chair **recommended** that the organisation's risk appetite acceptable risk profile was developed and that risk appetite descriptions were quantified to assist with benchmarking.

ACTION: The Risk Manager to develop LeO's risk appetite acceptable risk profile and quantify the risk appetite descriptions.

18. Clarity was sought on whether the individual risk appetite scores correlated with the overall risk appetite score of cautious. In response the Risk Manager explained that a holistic approach to risk appetite had been agreed at the Board's risk workshop earlier in the year, but, as the management of risk evolved, a greater focus would be placed on individual risk themes and then formal measures would be implemented to determine how the organisation assessed risk appetite based on those risk themes. The ARAC Chair was keen to see this is in place sooner and suggested the Executive to pick this up asap.

19. ARAC welcomed the proposed approach to horizon scanning for Q3 onwards. It was suggested that, as risk horizon scanning developed, it should be linked to potential impact and interdependencies.

20. ARAC **noted** the outcome of the risk culture survey. There was some disappointment about the high percentage of questions that had been answered incorrectly by staff, but the Committee **noted** that LeO was in the early stages of embedding risk culture and risk knowledge across the organisation, and that progress was being made, but more work was still to be done. The Committee was reminded that risk was now included as part of the induction programme for new starters.

21. The ARAC Chair thanked the Head of Programme Management and Assurance and the Risk Manager for the quality of the Risk Assurance Report, commenting on the considerable improvements that had been made to the report in the last 12 months.

22. Following a detailed discussion, ARAC **noted** the Risk Assurance paper and **approved** the:

- Current status and rating of strategic risks and issues.
- Current top Business Unit level risks.
- Current tracked Internal Audit actions.
- Risk appetite statements based on agreed risk themes.
- Proposed approach to horizon scanning for Q3 onwards

Item 5 – Internal Audit Update

23. GIAA reported on the good progress being made on delivering the 2021/22 Internal Audit plan, the following key points were made:

- All Q1 audits had been finalised.
- The Business Continuity and Covid Response Audit had received a substantial rating, with one medium and three low recommendations being made for further improvements. Auditors reported that the substantial rating reflected the resilience and good practice demonstrated by LeO in implementing the changes and improvements required in response to the Covid-19 pandemic. This audit had included a staff survey on the business continuity arrangements put in place in response to the pandemic which had received very positive responses from staff.
- The audit of Recruitment had been rescheduled from Q2 to Q3, enabling GIAA to take advantage of the specialist skills of a new Auditor joining the team.
- The audit of Performance Reporting was soon to be launched. It was expected that this audit would be concluded, and a final audit report completed in time to be presented at the next ARAC meeting in January.
- The OLC may be engaged in cross departmental audit activity as part of the MoJ's agreed 2021/22 Core Internal Audit Plan. ARAC's attention was drawn to the areas of potential OLC involvement and was asked to notify GIAA of any areas that it felt were not applicable or relevant.

ACTION: ARAC to notify GIAA of any areas set out in the MoJ's core Internal Audit plan that were not applicable or relevant for OLC involvement.

24. ARAC **noted** the Internal Audit update and congratulated LeO on the substantial audit rating received following the audit of Business Continuity and Covid Response.

Item 6 – Business Continuity Plan

25. ARAC received a report on the progress that had been made on developing the Business Continuity Plan (BCP), which had been audited by GIAA. The key points made were:

- The minor recommendations made by GIAA for further improvement to the BCP had been completed.

- Efforts in Q3 would be focussed on formal BCP training for appropriate staff; planning for the roll out of BCP guidance to staff; rolling out contact lists to appropriate staff; incorporating information on BCP into the staff induction programme and aligning the BCP with Business Plan activities.

- Regular reviews of the BCP would be scheduled to ensure that it remained up to date.

26. In discussion, ARAC had been pleased to note the substantial BCP audit rating and the BCP improvements that had been made including improved staff communications and the introduction of staff training. Acknowledging the significant amount of work that had underpinned these improvements, ARAC thanked all those staff involved.

27. The ARAC Chair enquired about cyber attack simulation protocols and was advised that in-house protocols were in place involving desktop simulation exercises which were undertaken in line with industry best practice.

28. ARAC **noted** the update on the Business Continuity Plan.

Item 7- External Audit Update

29. External Audit reported on External Audit activity that had taken place since the last ARAC meeting and presented the 2020/21 Management Letter. The following key points were made:

- The audit of the 2020/21 financial statements had been completed in July 2021.

- The 2020/21 Annual Report and Accounts had been certified by the Comptroller and Auditor General on 12 July 2021. The final updated Audit Completion Report had been circulated to ARAC in advance of certification.

- There were no new recommendations made following the audit of the 2020/21 Annual Report and Accounts; this demonstrated the significant improvements that had been made since 2019/20.

- Auditors had followed up on the recommendations that had been made during the 2019/20 audit in respect of the necessary changes to the governance structure and had included an update in the 2020/21 Management Letter.

- Overall External Auditors had been very content with the progress that had been made on addressing the recommendations from the 2019/20 financial audit but had highlighted some areas where there were opportunities for further improvement.

- In an informal response to the 2020/21 Management Letter and the further recommendations that had been made, the Head of Finance had advised External Audit that most of the serious issues arising from the 2019/20 audit had been addressed and had welcomed the further recommendations which would provide an opportunity to improve financial governance and associated financial statements and working papers even further.

30. Noting that the 2020/21 Management Letter still showed the risk ratings as high risk for each of the 2019/20 recommendations, the ARAC Chair sought clarity on whether these risk ratings would reduce following the action that had been taken in 2020/21 to address

the recommendations. Auditors confirmed that the risk ratings had reduced and were now considered medium to low risk. The ARAC Chair requested that this was reflected in the next iteration of the Management Letter.

ACTION: External Audit to reflect in the next iteration of the 2020/21 management Letter that the risk rating for each of the recommendations made following the 2019/20 audit had now reduced to medium / low risk

31. ARAC was advised that the Executive would formally respond to the 2020/21 Management Letter. A copy of this response would be presented at the next ARAC meeting.

ACTION: The Head of Finance to present the formal response to the 2020/21 management Letter at the next ARAC meeting in January and the Board Secretary to note this on the ARAC forward Plan.

32. ARAC **noted** the 2020/21 Management Letter and had been pleased with the progress that had been made on addressing the recommendations arising from the 2019/20 Financial Audit and that no further recommendations had been made following the 2020/21 Financial Audit.

33. The ARAC Chair stated that it would be helpful if a representative from Deloitte's attended the next ARAC meeting in January.

Item 8- Financial Governance

34. The Head of Finance reported on the full year financial forecast underspend against budget and other key financial reporting. The following key points were made:

- Aged debts (over 60 days) relating to case fees remained at a stable and low level.

- The average number of invoice payment days had reduced and over 60% of invoices were now paid on time.

- An overall underspend of approximately £600k has been forecast. A significant proportion of this underspend relates to staff costs, with a £500k underspend being forecast in the Resolution centre.

35. The ARAC Chair had been concerned by the magnitude of the budget underspend and sought assurance that there were sufficient mechanisms and processes in place to ensure that the budget was spent appropriately and in a timely manner, and that sufficient staff resource was in place to deliver the Business Plan.

36. The Chief Ombudsman and Head of Finance sought to assure ARAC on the steps that were being taken to mitigate the risks associated with staff recruitment and the associated staffing underspend, but explained that LeO had encountered some constraints, which were outside of its control. These constraints had hindered progress on plans to recruit more widely and were creating significant business risks. To give ARAC a sense of the challenges, the Committee's attention was drawn to the following points:

- Plans had been put in place to over recruit at the beginning of the year to mitigate the risks associated with insufficient staff resource.

- Two recruitments rounds for investigative staff had taken place: one in July, the other in November. There had been a degree of success following July's recruitment campaign.

- November's recruitment campaign had been brought forward to September to mitigate the level of operational vacancies at that time. LeO had only able to recruit 40% of the staff required; this had significant budgetary implications.

- Recognising the recruitment challenges, which were underpinned by a buoyant local recruitment market in which LeO was unable to compete in terms of pay and benefits, proposals had been put forward to the MoJ in August to consider the approval of a managed recruitment service to provide specialist skills to attract a wider range of candidates.

- This approval process had been cumbersome and unclear. LeO did not have a letter of delegation from the MoJ providing clarity on contract delegations and procurement procedures and LeO had encountered issues relating to how the managed recruitment service could be procured and contracted and in obtaining MoJ approval. The Chief Ombudsman would be providing feedback on this process to the MoJ.

- This had resulted in delays which had hindered plans for November's recruitment campaign being supported by the managed recruitment service. It had been expected that with the support of the managed recruitment service, LeO would have been able to attract the required number of staff and consequently reduce the staffing underspend but instead LeO has had to manage this recruitment campaign in house. It was expected that this campaign would now yield a similar number of new recruits to September's campaign.

- LeO was now able to proceed with one of the managed recruitment services, which would support the next recruitment rounds in January 2022. Work was ongoing to pursue additional support for recruitment activity and consideration was being given, with support from the Performance and Quality Task and Finish Group, to over recruiting in 2022 to address workforce fluctuations.

- Some budgetary spend has been prioritised on additional staffing in HR to address people performance issues and pursue activities to promote staff retention. Budget had also been prioritised for the recruitment of a communications expert to fill a post that would soon become vacant.

- Approval to advertise the communications role requires both Cabinet Office and MoJ approval; this could take up to two months. This vacancy presents a critical business risk, and the Chief Ombudsman is taking steps to expedite the approvals required so that the post can be advertised and recruited to as soon as possible.

- Recognising that the Legal Services Act 2007 currently prevents LeO using agency staff to undertake investigative work, The Chief Ombudsman was working with the MoJ colleagues to consider what scope there was for making legislative changes that would enable LeO to the use of agency staff in the future.

37. ARAC acknowledged the efforts that were being made by the Executive to deliver the Business Plan, recognised the constraints and delays that LeO was experiencing and the implications this had on fully utilising the staffing underspend.

38. Noting the points raised, Leona Awoyele **agreed** to provide clarity on the MoJ's contract delegations and the procurement procedures that LeO was required to follow and to discuss with her team ways to improve its processes for dealing with business cases, commenting that the MoJ was already aware of these issues, which had been raised in the past.

   ACTION: Leona Awoyele to provide clarity on the MoJ's contract delegations and procurement procedures that LeO was required to follow and to discuss with her team ways to improve its processes for dealing with business cases from Arm's Length Bodies.

39. The ARAC Chair expressed his thanks to Leona, commenting that any help provided by the MoJ to expedite requests for approvals from LeO/ OLC and provide clarity and support on contract delegations and procurement would be appreciated.

40. The Committee formally expressed its disappointment on behalf of LeO's customers and those that fund LeO's service for the impact of these delays which is not helpful for those that use the organisation to make complaints and also for the reputation of LeO.

41. Recognising that similar discussions had taken place about budgetary underspends in relation to LeO's ability to recruit and retain staff in previous years, ARAC emphasised the importance of MoJ's support in helping to resolve the issues that were being experienced in order to break this cycle.

42. Following a detailed discussion, the ARAC Chair recommended further discussion at the January Board to consider alternative protocols that might support LeO and break the cycle associated with recruitment, retention and the budgetary underspend and the associated risks.

   ACTION: The Board to consider alternative protocols that might support LeO and break the cycle associated with recruitment, retention and the budgetary underspend and the associated risks at its meeting in January 2022.

43. ARAC **noted** the update on financial governance.

Item 9 – Attestations and Single Tenders

44. The Head of Finance reported that, for the period May to August 2021 there were no items to attest for and no single tenders to report. The MoJ had been advised accordingly and confirmed that a formal paper was not required.

45. ARAC **noted** the update on attestations and single tenders

Item 10 – 2022/23 Budget Planning

46. The Head of Finance presented a high-level paper setting out the process in place for assuring ARAC and the Board in January 2022 that appropriate challenges and checks

have been undertaken as part of the 2022/23 budget and Business Plan submission. The following key points were made:

- Closer working arrangements were now in place between Finance, Business Intelligence, HR and Operations to strengthen the checks and verifications around key assumptions that underpinned forecasting and budget setting.

- Assumptions on current productivity levels were not driving the 2022/23 budget requirement. The 2022/23 budget would therefore be based on the existing budget and subject to any additional posts being added by the Executive.

47. The ARAC Chair reported that GIAA would be undertaking an audit of the 2022/23 budget setting process in Q1 to provide independent assurance on the robustness of the budget setting model and the process used.

48. There was some concern, considering the resource and capacity issues across the wider organisation, that rolling forward the same budget requirements in to 2022/23 might constrain business plans throughout the year and hinder the progress.

49. In response, the Executive reported that, having considered feedback from stakeholders, it would be looking to seek a budget that was necessary and realistic to deliver the improvements, rather than seeking one that was desirable. Recognising that there were pressures regarding capacity across the business, particularly in corporate support areas, the Chief Ombudsman stated that the 2022/23 budget ask needed to be prioritised on the key areas that addressed the operational challenges, whilst also balancing requirements in other areas of the business.

50. A discussion took place about whether there was scope to set out in the budget application what was actually needed to run the business successfully, making overt the limitations that LeO had, rather than putting forward a budget that undercharged for the cost of the service which made it look like the OLC was not asking for enough or it was constraining its ambition.

51. In response, the OLC Chair reported that in the past the OLC had not explicitly set out the various budget options but had sought to articulate this in a narrative. There was scope in the consultation document to set out different scenarios and what could be achieved with different budgets, but the OLC should be mindful of stakeholder feedback and consider the implications of LeO's current performance levels despite a 13% increase in budget in 2021/22.

52. Recognising that it would be important to ensure that the 2022/23 budget ask was credible, articulated well and that the balance was right, a further discussion on the 2022/23 budget would be taking place at the October Board meeting.

53. ARAC **noted** the budget setting assurance report.

Item 11 – Information Rights and Security Incidents

54. The Head of IT and Information Governance provided an update on information rights and security incidents. The following key points were made:

- Information requests remained stable with no emerging trends. All information requests had been dealt within statutory deadlines.

- Data breaches remained low, representing a small fraction of LeO's overall contacts with customers and stakeholders. The measures in place to ensure a robust data protection regime remained proportionate and effective.

55. ARAC sought to understand whether there had been any data breaches where the content of the data breached had been significant. In response, the Head of IT and Information Governance reported that majority of data breaches related to incorrect email recipient, none of the data sent to incorrect recipients was significant and there had been no involvement by the Information Commissioner.

56. ARAC was advised that data security e-learning had been undertaken by all staff, all new starters took part in data security induction sessions, and there was ongoing guidance and training delivered to staff throughout the year.

57. ARAC sought to understand whether there had been an impact on the number of data security incidents reported while staff were working from home during the pandemic. The Committee was advised of a small drop in the number of incidents reported at the start of the pandemic. Concerned that incidents were not being properly reported, all staff had been required to take part in refresher training and guidance was issued. Following this intervention, the number of incidents reported returned to pre-pandemic levels.

58. ARAC **noted** the update on information rights and security incidents.

Item 12 – Cyber security self-assessment and infrastructure report

59. The Head of IT and Information Governance reported on the 2021/22 cyber security self-assessment, which had identified some potential vulnerabilities and emerging threats relating to homeworking. Appropriate mitigating action had been taken and the cyber security framework now looked healthy, with proportionate and effective measure in place to provide adequate mitigation of the current cyber security threats.

60. An external review of cyber security was to be undertaken to provide further assurance and accordingly, further mitigating action would be taken to address any new threats identified.

61. ARAC **noted** the cyber security self-assessment and infrastructure report.

Item 13 – Annual Cyber Security report

62. The Head of IT and Information Governance presented the annual cyber security report, advising ARAC that:

- Key improvements that had been made to the IT infrastructure and cyber security in response to the findings of the 2020/21 cyber security self-assessment.

- Further to the 2021/22 cyber security self-assessment and the improvements identified through BCP rehearsals, further steps were taken to introduce proportionate measures to improve cyber security.

63. In response to a question raised, The Head of IT and Information Governance reported on the procedures and processes in place to mitigate ransomware attacks.

64. Following discussion, it was **agreed** that the Head of IT and Information Governance would liaise with GIAA, the LSB and MoJ to ensure that LeO's ransomware protocols were aligned.

ACTION: The Head of IT and Information Governance to liaise with GIAA, the LSB and MoJ to ensure the alignment of LeO's ransomware protocol.

Item 14 – Any other business

65. The ARAC Chair reported on a discussion with the Board Secretary regarding the requirement set out in the ARAC Terms of Reference for the Committee to undertake an annual self-assessment. The Board Secretary had raised strong concerns that ARAC had not undertaken a self-assessment since 2019. This had been because of changes in Committee membership and decisions made by previous ARAC Chair to postpone the self-assessment until Committee members had been in post longer on the basis that they would then be able to provide more detailed self-assessment feedback. To satisfy the requirements of the ARAC Terms of reference, the Board Secretary had recommended that Committee undertook its next self-assessment as a priority.

66. The ARAC Chair sought the Committee's views on this, asking when it should next undertake a self-assessment. The OLC Chair reported on plans, as part of the Board's wider review of governance and effectiveness, for an external review of Board effectiveness in March 2022; a paper setting out further details of this was to be presented at the October Board meeting. The paper sets out proposals and timelines for the future internal and external Board and Committee effectiveness reviews and how they would be better aligned. Considering this, it was **agreed** that ARAC would defer its self-effectiveness review and bring it in line with the wider external Board effectiveness review being undertaken in March 2022.

67. The ARAC Chair thanked the Executive for their hard work and for the quality of the papers presented at this meeting.

68. The ARAC Chair thanked Committee members for their commitment and challenge at this meeting.