



Department for  
Business, Energy  
& Industrial Strategy

# THE COMMITTEE ON RADIOACTIVE WASTE MANAGEMENT

Tailored Review Report 2018

October 2018



**OGL**

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# Contents

Executive summary	4
List of recommendations	6
Introduction	7
Form and function	8
Efficiency and effectiveness	11
The UK exiting the European Union	13
Devolution	14
Corporate governance	15
Terms of Reference	17
List of interviewees	22
Corporate governance assessment	23

# Executive summary

The Committee on Radioactive Waste Management (CoRWM) is an advisory NDPB, with a remit to provide independent scrutiny and advice to UK government and Devolved Administrations' ministers on the long-term management of higher activity radioactive wastes.

The CoRWM last had a Triennial Review in 2015<sup>1</sup> when it was a NDPB of the Department for Energy & Climate Change (DECC). The report findings were published in early 2016.

This Tailored Review has been conducted in accordance with [Cabinet Office principles](#), with an emphasis on:

- Form & function;
- Improving effectiveness and efficiency; and
- Governance

There are clear and persuasive reasons why the role performed by CoRWM continues to be needed and should be delivered by them. Given the importance of public trust in the government in delivering radioactive waste management policy and programmes, it is important that the function is delivered with political impartiality and, equally, that it is delivered independently of ministerial control.

CoRWM is a small Committee but it is well-respected amongst its industry peers, universities covering this subject matter, and the devolved administrations. It performs an important role in a sensitive area of government policy and generally discharges its role effectively. The review has found some areas where the Committee's ways of working could be improved to enhance their effectiveness.

There is an effective and good relationship between CoRWM and the BEIS Sponsorship Team. Here, there is evidence of an open dialogue and the BEIS Sponsorship Team has sufficient knowledge of the Committee to act as both an effective advocate and supporting critical friend to CoRWM.

At the time of the review, BEIS was in the process of recruiting a new permanent Chair for CoRWM. The Review Team recognised that CoRWM and its Sponsors had already identified that change was required in some areas. They had planned a 'Ways of Working' workshop to address questions around remit and interacting with Sponsors, which had been deferred so that it could happen when the new Chair was in place, and to take into account the recommendations coming out of this review.

The review heard evidence of concerns that CoRWM's remit was not clearly defined, so the Committee did not always focus on the most appropriate areas and recommends action to provide clarity. It would be important to have a regular process of review to ensure the Committee's remit adapts as required to reflect changes in the GDF programme, and sponsor requirements.

The role of CoRWM, and how it interacts with its Sponsors in BEIS and the Devolved Administrations (hereafter referred to as 'Sponsors') and other key stakeholders is closely

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<sup>1</sup> [www.gov.uk/government/consultations/committee-on-radioactive-waste-management-cormw-triennial-review-2015](http://www.gov.uk/government/consultations/committee-on-radioactive-waste-management-cormw-triennial-review-2015)

linked. A framework document is proposed which should describe these relationships and provide clarity around CoRWM's remit and governance arrangements going forward.

CoRWM works with, advises and / or scrutinises a number of stakeholders such as the Sponsors, BEIS policy teams, Radioactive Waste Management Ltd (RWM) and the Nuclear Decommissioning Authority (NDA). Some of these relationships are more developed than others, and there is a need for CoRWM to work with relevant parties to define how it will engage with them in a more open way. Work has been done in recent months to begin this process, which is welcome and should be continued.

# List of recommendations

The recommendations from the review are collated below.

## Recommendation 1: Form and function

There is a need for greater clarity around the remit for CoRWM, and how that is agreed. CoRWM Sponsorship Team to work with CoRWM and the Devolved Administrations on reviewing and updating the CoRWM remit, and to seek wider approval, where necessary. This should include consideration of how CoRWM should engage, advise and scrutinise other bodies such as NDA and RWM.

**Milestone:** December 2018

## Recommendation 2: Form and function

There is a need to formalise CoRWM's agreed remit in a Framework Document including governance principles, and defined roles and responsibilities.

**Milestone:** December 2018.

## Recommendation 3: Form and function

CoRWM and its Sponsors to consider to what extent their remit involves public engagement, and, if CoRWM is expected to deliver this function, set out some guidelines or expectations.

**Milestone:** December 2018.

## Recommendation 4: Effectiveness and efficiency

There is a need to maintain a capable secretariat within the BEIS Sponsor Team, with the right skills to provide professional added-value secretariat function.

**Milestone:** Ongoing

## Recommendation 5: UK exiting the EU and Devolved Administrations

CoRWM to work with Sponsors to carry out further analysis on how the devolved administrations are impacted by the UK exit from the EU. In collaboration with BEIS, CoRWM will also carry out an impact analysis on how the Committee will be impacted by the UK's exit from the EU and from Euratom, and take any mitigating actions as necessary.

**Milestone:** December 2018

# Introduction

The purpose of the Committee on Radioactive Waste Management (CoRWM) is to provide independent advice, based on informed scrutiny of the available evidence, to UK government and Devolved Administration ministers (hereafter called ‘sponsor ministers’) on the long-term management of radioactive waste, arising from civil and where relevant defence nuclear programmes, including storage and disposal.

CoRWM will provide strategic oversight of radioactive waste management in the UK, in such a way that does not duplicate the role already fulfilled by the statutory independent safety, security and environmental regulators.

The primary objectives of CoRWM are to:

- a) provide independent evidence-based advice to sponsor ministers on the government’s NDA’s and RWM’s proposals, plans and programmes to deliver geological disposal (excluding Scotland), together with robust interim storage, for the UK’s higher activity wastes as set out in the work programme agreed annually between CoRWM and sponsor ministers; and
- b) provide independent, evidence-based advice on other radioactive waste management issues as requested by sponsor ministers, including advice requested by Scottish government in relation to its policy for higher activity radioactive waste.

In fulfilling its remit to provide independent and evidence-based advice, CoRWM is expected to maintain an independent overview of issues relevant to the delivery of government’s radioactive waste management programmes. It should bring to the attention of sponsor ministers issues that it considers to be either:

- positive and worthy of note or
- concerns that, in the Committee’s opinion need to be addressed

In the past year, CoRWM focussed on the processes preparing for the Working with Communities (WWC) consultation in England and Northern Ireland and the National Policy Statement (NPS) consultation in England and Wales (both launched in January), helping to refine the final documents that were released. They also produced a report considering the impact of Euratom exit on the UK’s radioactive waste management arrangements.

# Form and function

## Background

CoRWM was set up in 2003 as part of government's Managing Radioactive Waste Safely (MRWS) programme. Its initial remit was to conduct a review of the options for the long-term management of the UK's higher activity radioactive waste (HAW) and to recommend an option (or combination of options) to government. CoRWM reported in July 2006 and government responded in October 2006, accepting most of CoRWM's recommendations. The government then began work on the implementation of policy for geological disposal, using a voluntarism and partnership approach.

There was a public consultation in 2007 on a framework for implementing geological disposal. The consultation was followed in June 2008 by a White Paper and an invitation to local communities to express an interest in hosting a geological disposal facility. In 2007, the Scottish government decided not to endorse deep geological disposal and it subsequently developed its own policy for the management of civil radioactive waste located within its territory, which consists of near-surface, near-site storage and disposal.

In October 2007, government changed the focus of CoRWM and gave it new terms to provide independent scrutiny and advice to UK government and devolved administration ministers on the long-term management, including storage and disposal, of radioactive waste. This Committee, known colloquially as "CoRWM 2", had the primary task of providing independent scrutiny of the UK government's and NDA's proposals, plans and programmes to deliver geological disposal, together with robust interim storage, as long-term management options for the UK's higher activity wastes.

In November 2012, government refreshed the membership of the committee, with a new Chair and six new members. The 2012 Committee had a Chair and 12 Members; this was reduced to a Chair and 11 Members in 2014. In 2016 the Committee saw some time-limited appointments come to an end and, following an open competition, new members joined. The Committee comprised of a Chair and 13 Members.

## Tailored Review process

The Review Team spoke to committee members, BEIS officials and representatives from the devolved administrations, RWM and NDA. All agreed that CoRWM should continue to exist. Without CoRWM or an equivalent there would be no means to provide independent and impartial advice to ministers and made available to the public.

A clear technical function means that it is necessary that CoRWM's work is delivered in line with the Corporate Governance Code on Good Practice. Equally, it means that the work must be delivered independently of ministerial control. The importance of having an independent scrutiny and advice function is recognised by other countries. Most countries with a radioactive waste management programme have both nuclear regulators, and a body fulfilling a role similar to that of CoRWM, including Switzerland, Sweden, France, USA and Canada. There are a variety of approaches where expert opinions differ and communities, the developer or governments wish to obtain an objective opinion. Stakeholders pointed to international experience in demonstrating the importance of the UK having an independent body in



providing advice and scrutiny, across a wide range of issues above and beyond the statutory roles of the independent regulators:

Similarly, experience overseas has demonstrated the important role an independent body can play in helping to ensure this full range of issues is considered in an open and transparent manner that allows progress to be made.

The review team concluded that there is continued support for independent scrutiny and advice to UK government and Devolved Administration ministers on the long-term management of higher activity radioactive waste (HAW). This is in line with the findings of the previous Triennial Review of CoRWM, where there was also strong stakeholder support for these functions. It also aligns with the findings of the Cabinet Office Public Bodies Review in 2010 and the House of Lords Select Committee on Science and Technology's inquiry into CoRWM, both of which supported the existence of an independent and effective scrutiny body in playing a role in maintaining public trust and confidence in the government's strategy for radioactive waste disposal.

CoRWM was involved in the 'Functional review of bodies providing expert advice to government' -March 2017. Its suitability for Expert Committee status was considered and discounted.

The team considered whether CoRWM could be merged with another body, say from private sector. None of the interviewees saw any benefit in such a merger, and many thought it would be actually harmful, as it would lose the independence and impartiality CoRWM has built up over the years.

The review also considered whether there would be a potential benefit in bringing CoRWM within BEIS' departmental boundary. Again, interviewees were universally against this option, for evidenced reasons. Bringing the CoRWM into BEIS would compromise the perception of impartiality and freedom from ministerial control. CoRWM also serves the Devolved Administrations as well as BEIS.

The review explored the 'breadth' and 'depth' of CoRWM's remit when engaging with its stakeholders. There were comments that potentially CoRWM is over-stretching itself and not necessarily concentrating on those areas where it can best add value, or able to keep abreast of the details of such a broad spectrum of work. It was felt that seeking collective agreement on CoRWM's remit and area of focus would help.

As a small Committee, CoRWM had to ensure they had capacity to cover topics in sufficient detail. This means thinking carefully about their core areas of expertise and ensuring their remit is as clearly defined, agreed and documented as possible. CoRWM's remit should be reviewed on a regular basis as the GDF programme advances or the sponsor requirements change.

## Recommendation 1: Form and function

There is a need for greater clarity around the remit for CoRWM, and how that is agreed. CoRWM Sponsorship Team to work with CoRWM and the Devolved Administrations on reviewing and updating the CoRWM remit, and to seek wider approval, where necessary. This should include consideration of how CoRWM should engage, advise and scrutinise other bodies such as NDA and RWM.

**Milestone:** December 2018

The review looked at key operational and strategic documents pertaining to CoRWM. These include;

- Proposed Programme of work 2018-2021
- CoRWM's Code of Conduct, which sets out ways of working; and
- CoRWM's Terms of Reference, which details the scope of the Committee's work.

These three documents, although serving different purposes could potentially lead to the possibility of confusion and lack of clarity. Benefits would be realised by having an over-arching Framework Document.

## Recommendation 2: Form and function

There is a need to formalise CoRWM's agreed remit in a Framework Document including governance principles, and defined roles and responsibilities.

**Milestone:** December 2018.

The review heard evidence that the level of public involvement and engagement with CoRWM business was very low and that the added value was minimal.

Interviewees expressed a range of views on the type and extent of CoRWM's public role so the review has concluded that due consideration should be given to future plans in this area. As the GDF programme becomes more public in terms of engaging with host communities, it will be important for CoRWM to have a clear remit so they can confidently engage with stakeholders and the public to communicate their advice and views clearly.

## Recommendation 3: Form and function

CoRWM and its Sponsors to consider to what extent their remit involves public engagement, and, if CoRWM is expected to deliver this function, set out some guidelines or expectations, taking account of CoRWM's current skills and plans for future recruitment.

**Milestone:** December 2018.

## Efficiency and effectiveness

The review heard evidence from a variety of interviewees on how CoRWM could be more effective and efficient. There was uncertainty around the right approach for public engagement, and the need to ensure it continues to happen. There was a lack of clarity amongst some interviewees around how CoRWM arrived at an official view when working through sub-groups (e.g. if a position is developed by a sub-group of three or four members). Some of the sub-group discussions were more of a summary of what was considered rather than an overall conclusion. CoRWM had recently introduced a system for codifying advice which should bring clarity here going forwards.

It was important that CoRWM were free to undertake site visits as part of their scrutiny work, and to make sure they are informed about the latest position of radioactive waste management at key sites. Some interviewees raised questions over the resource implications when CoRWM members go on site visits. It would be important to agree objectives for visits which set out the benefits for both CoRWM and the host.

For the Committee to be most effective and to operate efficiently for Members and for those it scrutinises and advises, there is a strong case for continued well-resourced secretariat support. Many of the groups interviewed reported the continual need for a good and well-resourced Secretariat in BEIS, that can provide the necessary technical support as well as co-ordination for CoRWM. Previous years have been challenging, but there have been great strides made by the recently bolstered Secretariat. Examples of where the secretariat added value, included; logistic arrangements; uploading documents to the CoRWM website to increase visibility, drafting reports and documents; and monitoring the performance and outputs of the Committee. It would be important for the Secretariat to continue to be appropriately resourced as the terms of the current team were coming to an end. Plans were in hand for these vacancies to be filled.

### Recommendation 4: Effectiveness and efficiency

There is a need to maintain a capable secretariat within the BEIS Sponsor Team, with the right skills to provide professional added-value secretariat function.

#### **Milestone:** Ongoing

This proposed work programme outlines what the Committee believes to be the key activities that are planned to deliver the objectives of the Implementing Geological Disposal programme in England and Wales and the delivery of the Scottish government's policy on radioactive waste management. The work programme has been tailored to deliver what the Committee believes is necessary to meet the expected challenges in year 2018-19, including examining the implications for radioactive waste management as a result of the UK's withdrawal from the Euratom Treaty.

The proposed programme consists of a 3-year rolling plan and, as such, the greatest detail is given for the first year (2018-21). Broadly, the programme for 2018-19 shows that CoRWM will focus most of its time on the scrutiny of the work carried out by BEIS and RWM on the delivery of the work packages outlined in the July 2014 White Paper "Implementing Geological Disposal" (IGD), and the effectiveness of the launch of the IGD programme in England and Wales. Other activities included in the work programme are: the scrutiny of radioactive waste management in Scotland and Wales, with a watching brief on Northern Ireland; RWM's plans

for to GDF site investigation and the development of the GDF safety case; the ongoing storage of radioactive waste, spent fuel and nuclear materials that may be destined for disposal in a GDF and the implications of the UK withdrawal from the Euratom Treaty.

# The UK exiting the European Union

As part of the review, the impact on CoRWM of the UK leaving the EU was considered. Both CoRWM and its stakeholders have a general interest in overall implications but expect actual impact on the Committee and the work it delivers to be minimal.

CoRWM was included in BEIS work to look at the implications on BEIS Partner Organisations of the UK's withdrawal from the EU. CoRWM and the Sponsor Team met to assess the implications of Brexit on the Committee and its work, and agreed to a plan was not necessary as a result.

In terms of the work of the Committee, CoRWM had established a Euratom sub-group which had delivered a report assessing potential gaps in legislation from a radioactive waste management perspective arising out of the UK's withdrawal from Euratom. This was welcomed by Sponsors who were seeking further advice from the Committee as the withdrawal process continues. The review heard evidence of how specific impacts could affect localities. However, overall the review heard positive messages around CoRWM's collaboration with European partners, over the years, and it was hoped that any EU exit does not have wider implications with further collaborations, going forwards.

## Recommendation 5: UK exiting the EU

CoRWM to work with Sponsors to carry out further analysis on how the devolved administrations are impacted by the UK exit from the EU. In collaboration with BEIS, CoRWM will also carry out an impact analysis on how the Committee will be impacted by the UK's exit from the EU and from Euratom and take any mitigating actions as necessary.

**Milestone:** December 2018.

## Devolution

CORWM has a responsibility to advise ministers in BEIS and the Devolved Administrations. DAERA in Northern Ireland has not had a minister since March 2017, so where sponsor minister approval has been required during this time, responsibility for this has fallen to senior officials in Northern Ireland. The Committee has a good relationship with all Administrations, who are all supportive of the work CoRWM does and advice it provides. CoRWM has been active in supporting the Welsh government as they developed their Policy on the Management and Disposal of Higher Activity Radioactive Waste and launched a public consultation, and the Scottish government as they developed their Higher Activity Radioactive Waste Policy.

CoRWM's Work Programme must be approved by all Sponsor Ministers annually. The Devolved Administrations had been closely involved in the appointments process for new CoRWM members, which must be agreed by all four sponsor ministers. The Chair has a regular meeting with all Sponsors to brief them on CoRWM's progress in delivering the Work Programme.

CoRWM's proposed work programme for 2018-21 was presented to sponsor ministers in April. Officials from the Devolved Administrations worked with the Committee during the drafting process to ensure that the Work Programme covered their priorities.

## Corporate governance

The review assessed CoRWM's adherence to principles of good corporate governance. It examined how CoRWM is held to account for delivery of its objectives and against the requirements of any arm's-length body, as well as the governance of decision-making.

An assessment of Corporate Governance is given on page 20.

## Framework Document

There is no Framework Document between CoRWM and BEIS. CoRWM has a Code of Conduct, which sets out ways of working, and a Terms of Reference, which details the scope of the Committee's work. Under its Terms of Reference, CoRWM only provides advice to government, through ministers or their officials. CoRWM may also provide comments or observations to others, in which case these will be developed through deliberation by the whole committee.

The Review has recommended that a Framework Document is put in place – see Recommendation 2 above.

## Reaching consensus

The CoRWM Code of Conduct describes how formulation of advice is carried out collaboratively and wherever possible, decisions are reached by consensus and reports or publications should reflect these. CoRWM strives to produce advice which is agreed in Plenary by all members.

CoRWM has an agreed process for the rare circumstances where consensus cannot be achieved, although there has not been a need for this in recent memory. Reports should adequately reflect the differences and give adequate weight to a majority opinion. Any member may disassociate him or herself from a particular decision and this should be recorded alongside the record of the decision. Members do not have an absolute right to express a minority view for inclusion in a CoRWM report and in such cases agreement from the rest of the committee should be sought. The Chair has the final decision in this case. Members should not take personal initiatives to disassociate themselves publicly from CoRWM's reports or publications.

If the Committee agrees that a minority view can be published there are two ways in which members who do not agree to all, or parts of, a "Recommended Draft" can have their views made known. One is to have their views recorded in the minutes of the relevant plenary meeting, with their names given if the dissenting members request this. The other is the production by the dissenting members of an addendum to the document. In such cases the length and format of the addendum must be agreed with the CoRWM Chair or his/her appointed deputy for the document but the content of the addendum is for the dissenting members alone.

## Communications with ministers

Communications between the Committee and ministers will generally be through the Chair except where the Chair has agreed that an individual member should act on his or her behalf. However, any member has the right to raise a matter directly with minister(s) on any matter which he or she believes raises important issues relating to CoRWM business. In such cases, members should normally seek agreement from the Chair and, if appropriate, other members of the Committee.

## Publications

CoRWM's policy is to make as much of its information as possible available to the public by publishing documents online.

The Committee will maintain its best efforts to ensure that there are 'no surprises' in published documents where time allows so that the sponsoring ministers or their officials are aware of CoRWM's advice before it is published. Documents should be shared with relevant stakeholders and time allowed for checks of factual accuracy or sensitivities, without compromising CoRWM's independence and impartiality.

'Closed' or 'Draft' material should not be disclosed outside the Committee, unless it is to check facts, for example to accurately record information that was received in a meeting. If a member receives a request for closed or draft information, the member should seek permission from the Chair before releasing it.

## Corporate governance reform

The government set out plans to raise standards of corporate governance across the business community in its response to its Green Paper on Corporate Governance Reform, published in August 2017.

Key measures include improving shareholder scrutiny of executive pay, strengthening the employee voice in board-rooms, and building confidence in the way large private companies are run. The government intends to deliver this through a mix of changes to the non-legislative UK Corporate Governance Code, business-led action and regulation where necessary.

While these reforms do not directly require such action to be taken by public bodies or government departments, BEIS will consider the role it should play in working with both government departments and its partner organisations to ensure similar standards are maintained, including the benefits of adopting the voluntary corporate governance principles.

The relevance of this to a Committee set-up was considered and although much of it is not relevant, it is important that CoRWM continues to work to the highest standards of corporate governance, where applicable.



# Tailored Review 2018 Terms of Reference

## The Committee on Radioactive Waste Management

The Committee on Radioactive Waste Management (CoRWM) is an advisory NDPB, with a remit to provide independent scrutiny and advice to UK government and Devolved Administration ministers on the long-term management of higher activity radioactive wastes. Its primary task is to provide independent scrutiny on the government's and Radioactive Waste Management Ltd's (RWM) proposals, plans and programmes to deliver geological disposal, together with robust interim storage, as the long-term management solution for most of the UK's higher-activity wastes.

It reports to ministers from the UK Department for Business, Energy and Industrial Strategy (BEIS), the Scottish government, the Welsh government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland. Sponsor ministers jointly make appointments to the Committee and agree its annual work programme, and the budget is set and paid by BEIS.

CoRWM has no employees and comprises a Chair and 13 members who are paid on a per diem basis. The Chair has a time commitment of approximately one and a half days per week and members have a maximum time commitment of one day per week. The Committee holds open (accessible to the public) and closed plenary meetings at various locations around the UK. The CoRWM Secretariat, comprising one full time member of staff, is within BEIS. The Committee also currently has a 'technical secretary' who is seconded into BEIS for 6 months from November 2017 – May 2018. In 2017-18, CoRWM had a budget of £318,000. £275,000 of this is delegated to the Committee and £43,000 is managed by the Secretariat.

## Previous reviews

The CoRWM last had a Triennial Review in 2015<sup>2</sup> when it was a NDPB of the Department of Energy & Climate Change (DECC). The report findings were published early 2016.

## Background

This Tailored Review will be conducted in line with [Cabinet Office principles](#) and as a light touch review being proportionate, timely, challenging, inclusive, transparent and providing value for money. Considering these principles, the CoRWM review will have specific emphasis on:

- **Efficiency.** Both reporting on measures already in progress, and recommending other opportunities for efficiencies as appropriate. The 2014 Triennial Review made recommendations linked to financial monitoring and business planning. The review will consider progress on these recommendations and the commercial context of the organisation.

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<sup>2</sup> [www.gov.uk/government/consultations/committee-on-radioactive-waste-management-cormw-triennial-review-2015](http://www.gov.uk/government/consultations/committee-on-radioactive-waste-management-cormw-triennial-review-2015)

- **Governance.** Good corporate governance is central to the effective operation of organisations. The review will cover the governance arrangements for CoRWM. The controls, processes and safeguards in place will be assessed against the relevant principles and policies set out in the code of good corporate governance which reflects best practice in the public and private sectors. This will include review of the lines of accountability, performance of the governance structures and key roles within them, approach to financial management, and associated controls and/or oversight and the associated links between the CoRWM and BEIS.

In assessing the potential for Efficiencies the Review will principally consider the following types of potential benefits:

#### Type A –

**Efficiencies or improvements in outcomes:** (greater use of shared services, release of resources to front-line activity). These benefits should result in increased productivity/other improved performance outcomes of which some will be cashable in the short-medium term.

For example –

- Improved performance outcomes – better operational processes resulting in more for less.
- Greater efficiency in support functions and/or increased use of shared services.
- Clearer or more clearly stated organisational purpose, resulting in better focus on key areas.

#### Type B –

**Wider benefits:** (such as improved governance, transparency, accountability, or staff engagement). These benefits may not result in cashable savings immediately, but some may yield or prompt cashable savings in the medium term.

For example -

- Stronger internal controls and governance; Better risk management processes.
- Closer engagement with secretariat and the Committee.
- Increased customer satisfaction.

In making these assessments the Review will consider (for example) how CoRWM:

- Delivers of its current functions and responsibilities
- Prioritises and makes decisions
- Innovates and plans for the future
- Communicates internally and externally
- Manages its reputation and promotes its work
- Works with BEIS, and with other bodies
- Generates income and develops its commercial capability

- Uses digital services and technologies

To ensure a holistic approach, the review team will also consider the remaining principles of the tailored review principles. These are:

- **Devolution.** Understanding the remit and reach of the body, dependencies and stakeholders within each of the devolved territories as well as within England, should be a fundamental part of scoping the review.
- **The UK leaving the EU.** It is appropriate to consider the extent to which the CoRWM's functions are delivered in an environment currently directly affected by EU regulations or processes. Understanding how the body intends to respond to the UK leaving the EU should then be considered as part of the review where possible.
- **Status.** Assessing the continuing requirement for the functions performed and the current form of CoRWM, and determining appropriate status, form and function. Including the Cabinet Office "three tests":
  1. Is this a technical function (which needs external expertise to deliver)?
  2. Is this a function which needs to be, and be seen to be, delivered with absolute political impartiality (such as certain regulatory or funding functions)?
  3. Is this a function which needs to be delivered independently of ministers to establish facts and/ or figures with integrity?

The review will conclude by producing a clear and concise report that will describe the areas probed by the review, the evidence referred to during the course of the review, and also any recommendations. A final report will be published on GOV.UK.

## Approach and methodology

The review is conducted on behalf of the Secretary of State. A small, dedicated review team will be the day-to-day contacts for CoRWM and will produce the final report. The review team will be led by an individual independent of the body and sponsor function, and will include members with relevant expertise and knowledge of the specific areas being considered under the review; for example finance/Management of Public Money (MPM); corporate governance, etc.

The review team will be:

- Reviewer – Anurag Kher, BEIS Partnerships Team
- Reviewer – Eileen Mortby, BEIS Partnerships Team
- Critical Friend – Helen Bodmer
- The devolved administrations will be consulted during the review and on any findings.

The approach will be participative and inclusive. Although Cabinet Office guidance does not allow organisations being reviewed, or their sponsors, to be members of the review team itself, they will be closely involved as the review progresses:

- The review team will agree Terms of Reference with the acting Chair, Campbell Gemmell, and its Departmental sponsors – and then with Cabinet Office Public Bodies Reform Team;
- The review will begin with a meeting with CoRWM senior managers and its sponsor team, to agree approach and timings;
- Following this the review team will work with the CoRWM to set up interviews and ensure it understands the evidence base;
- The approach will be iterative and the review team will share emerging findings and recommendations with CoRWM and its sponsors throughout;
- Interim and final reports will be produced in draft and then finalised following discussion with the CoRWM and sponsors.

The team will be supported by a Tailored Review programme governance structure within BEIS to ensure consistency and transparency throughout the process (Annex 1). As a Cabinet Office defined Tier 3 review, the CoRWM Review will not be subject to a formal Challenge Panel. However the report may be subject to a random audit by the Public Bodies Reform Team, Cabinet Office.

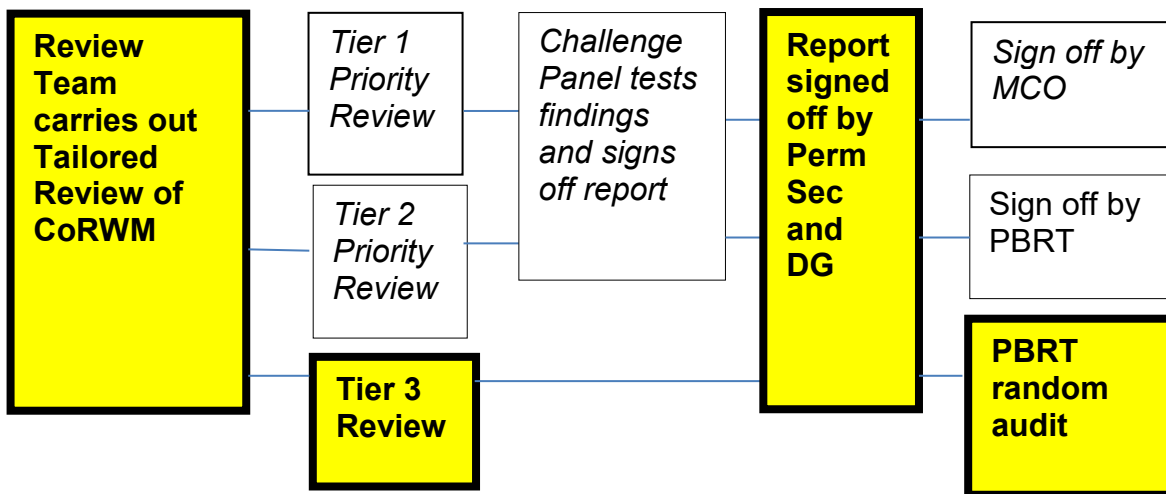
The end-to-end review is anticipated to last up to 8 weeks between February-March 2018 (from confirming the review scope to the report being completed).

## Annex 1 – BEIS Tailored Review Programme: governance

Tailored Reviews are designed to be proportionate and capable of being delivered at pace. The Cabinet Office has set a “Three Tier” approach to Reviews. The Tier to which an Organisation has been allocated will to an extent determine the conduct and the Governance of the Review.

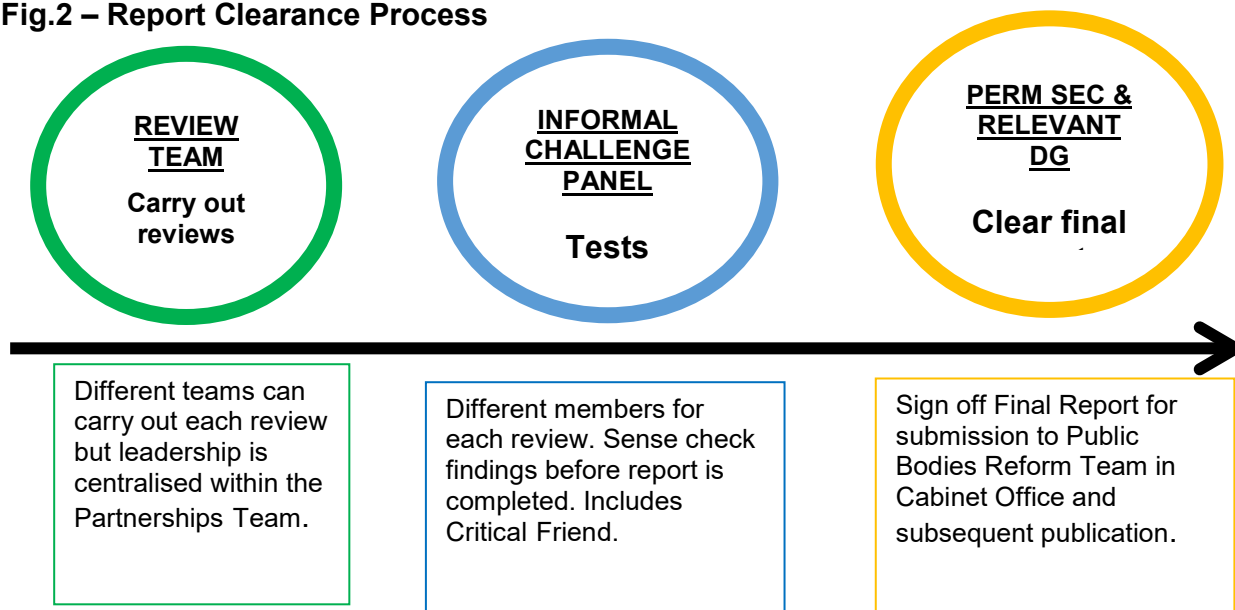
Based on Cabinet Office criteria, including spend, size and length of time since last Triennial Review CoRWM has been designated as a Tier 3 Review.

**Fig.1 - Governance of CoRWM Tailored Review**



Once agreed, the final report will be cleared by DG and the Permanent Secretary. It may then be subject to a random audit by the Public Bodies Reform Team (PBRT) in Cabinet Office.

**Fig.2 – Report Clearance Process**



# List of interviewees

Andrew Craze, Head of HSSEQ Systems - RWM Ltd

James McKinney, Head of Integrated Waste Management, NDA

Umran Nazir, Deputy Director, Decommissioning & Radioactive Waste, BEIS

Ian Mulvaney, GDF Governance, Strategy & National Geological Screening, BEIS

Frankie Brooks-Tombs, Head of Decommissioning, Spent Fuel & Nuclear Materials, BEIS

Kate McCready, BEIS Sponsorship Team

Seb Lawson, BEIS Sponsorship Team

Campbell Gemmell, CoRWM interim Chair

Julia West, CoRWM interim Deputy Chair

Janet Wilson, CoRWM member (Chair, Sub-group 1)

Stephen Newson, CoRWM member (Chair, Sub-Group 4)

Andrew Walters, CoRWM member

Melissa Denecke, CoRWM member

Joanne Hill, CoRWM member

Martin MacDonald, Policy Advisor, Radioactive & Nuclear Decommissioning Team, Scottish government

Bruce Cairns, Chief Policy Advisor, RWM Ltd

James Gibbs, Welsh government

Robert Williams, Welsh government

Charles Stewart-Roper, Team Leader, Radioactive Waste & Nuclear Decommissioning Policy, Scottish government

# Principles of corporate governance – assessment

## Accountability

Principles of corporate governance	Assessment	Explain
<b>Statutory Accountability:</b> The public body complies with all statutory and administrative requirements on the use of public funds (inc HMT Managing Public Money, and CO/HMT spending controls)	Compliant	The CoRWM budget is managed by the CoRWM Secretariat based in BEIS and so follows government accounting rules and procedures, including around travel and subsistence.
The public body operates within the limits of its statutory authority and in accordance with delegated authorities agreed with BEIS	Compliant	The CoRWM budget is managed by the CoRWM Secretariat based in BEIS; it is not delegated to the Committee.  Although there is no Framework Document between CoRWM and BEIS, there is, instead a Terms of Reference, whilst recognising the policy framework within which it will operate, including the roles and responsibilities of government, the NDA, RWM and the various statutory independent regulators in relation to CoRWM's own advisory role.
The public body operates in line with statutory requirements for the Freedom of Information Act (Fol)	Compliant	CoRWM remains ready to honour its responsibilities under the Freedom of Information Act and, in the past year (2017-18), received one request under that provision, which was answered within the prescribed timescale.
The public body has a comprehensive publication scheme	Compliant	CoRWM is committed to openness of information on its activities. Its website provides a wide range of information and it is updated regularly. CoRWM continues to publish all of its reports and minutes, within a short period after they have been issued, and further plans to make available previous decisions, in electronic form.
The public body proactively releases information that is of legitimate public interest	Compliant	CoRWM actively publishes responses to calls for evidence, reports and minutes their website.
The public body Produces Annual Reports and Accounts which are laid before Parliament	Compliant	The organisation's Annual Reports and Work Programme are published on <a href="http://www.gov.uk">www.gov.uk</a> rather than being laid before Parliament. It does not produce accounts but include information on their spending in their annual report.

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The public body applies with data protection legislation	Compliant	CoRWM follows BEIS Data Protection procedure and public information charter. The Secretariat has been liaising with BEIS central teams on implementation towards GDPR. An initial assessment has been carried out.
The public body complies with Public Records Acts 1958 and 1967	Compliant	As a Committee appointed by ministers, CoRWM is deemed part of the Crown. Under the Public Records Act 1967 (PRA), this requires CoRWM's records to be transferred to The National Archives or a place of deposit within 20 years. This does not require the records to be publicly available, but they are subject to FOI requests. CoRWM's first records stem from 2003, and all records are currently being organised for publication on The National Archives website.
<b>Accountability for public money:</b> there is a formally designated Accounting Officer (AO) who in particular has a responsibility to provide evidence-based assurances required by the Principal Accounting Officer (PAO)	N/A	BEIS does not appoint an AO for CoRWM. The Nuclear Directorate within BEIS allocates a small admin budget for Travel & Subsistence.
The role, responsibilities and accountability of the AO should be clearly defined and understood and the AO should have received appropriate training.	N/A	See above
The public body should be compliant with requirements set out in Managing Public Money, relevant Dear Accounting Officer letters and other directions.	Compliant	CoRWM follows the principles of Managing Public Money.



Principles of corporate governance	Assessment	Explain
<p>The public body should establish appropriate arrangements to ensure that public funds:</p> <ul style="list-style-type: none"> <li>• are properly safeguarded;</li> <li>• are used economically, efficiently and effectively;</li> <li>• are used in accordance with the statutory or other authorities that govern their use;</li> <li>• deliver value for money for the Exchequer as a whole;</li> <li>• are subject to Treasury approval, either directly or through established delegated authority</li> </ul>	Compliant	<p>Small admin budget is for Travel &amp; Subsistence for Committee members, approved as part of the BEIS settlement from Treasury. CoRWM discuss the appropriate use of funds and seek to maximise value for money by reducing travel costs where possible and making use of digital communications where appropriate. Budget is discussed at Plenary meetings.</p>
<p>The annual accounts are laid before Parliament after certification by the Comptroller and Auditor General.</p>	Compliant	<p>The budget allocated to CoRWM is included within the BEIS budget and is accounted for within the BEIS Annual Report &amp; Accounts</p>
<p><b>Ministerial Accountability:</b> The Secretary of State (SoS) and Sponsor should exercise appropriate scrutiny and oversight of the public body.</p>	Compliant	<p>CoRWM is accountable to BEIS ministers and Parliament for the work that it does. BEIS has good oversight on the CoRWM activities and risks. Officials from the Devolved Administrations worked with the Committee during the drafting process to ensure that the Work Programme covered their priorities.</p>
<p>Appointments to the committee should be made in line with any statutory requirements and, where appropriate, with the <i>Code of Practice</i> issued by OCPA.</p>	Compliant	<p>Appointments to CoRWM are made in accordance with the Code of Practice of the Commissioner for Public Appointments. All appointments are made on merit and political activity plays no part in the selection process. However, in accordance with the Nolan recommendations, appointees' political activity (if any declared) must be made public.</p>
<p>The Secretary of State will normally appoint the Chair and all non-executive committee members of the public body and be able to remove individuals whose performance or conduct is unsatisfactory.</p>	Compliant	<p>The appointment of the Chair and Committee members is recommended by the BEIS minister and approved by the Secretary of State. Devolved Administrations have been involved and consulted in the process.</p>

Principles of corporate governance	Assessment	Explain
The Secretary of State should be consulted on the appointment of the Chief Executive and will normally approve the terms and conditions of employment.	N/A	There is no Chief Executive
The Secretary of State should meet the Chair and/or Chief Executive on a regular basis.	Part-compliant	In BEIS, oversight for CoRWM is delegated to the responsible junior minister, but a meeting had not taken place over the last year due to the change in CoRWM's leadership. The Acting-Chair had recently met with the Cabinet Secretary in Scotland. . The new Chair is seeking an introductory meeting with sponsor minister soon after their appointment.
Parliament should be informed of the activities of the public body through publication of an annual report.	Compliant	The annual report is published on gov.uk.
A range of appropriate controls and safeguards should be in place to ensure that the Secretary of State is consulted on key issues and can be properly held to account (e.g. Business Plan, power to require information, a general or specific power of Ministerial direction over the public body, a power for the Secretary of State to be consulted on key financial decisions.)	Compliant	CoRWM's deliverables and budget will be set out each year in a proposed three-year rolling work programme, which is approved by sponsor ministers on an annual basis.

## Roles and responsibilities

Principles of corporate governance	Assessment	Explain
<p><b>Role of the Sponsoring Group:</b> The Group should scrutinise the performance of the public body. There should be appropriate systems and processes to ensure effective governance, risk management and internal control in the public body.</p>	Compliant	<p>The Chair has regular meetings with Sponsors to discuss the work of the Committee / delivery of the work programme. Over the last year the BEIS Sponsor Team has asked the Committee to focus more on outputs, and have started to analyse how they have delivered against the outputs included in the Work Programme. The Chair has an annual appraisal carried out by BEIS where Committee performance would be discussed. The Secretariat would also plan for an annual meeting with the minister to discuss performance. The Chair undertakes annual appraisals of member performance. The Sponsorship Team seeks feedback on Committee performance from policy teams and other stakeholders.</p>
<p>There should be a Framework Document in place which sets out clearly the aims, objectives and functions of the public body and the respective roles and responsibilities of the Secretary of State, the Sponsoring Group and the public body. It should be regularly reviewed and updated and follow relevant CO and HMT guidance. The Framework document should include a Financial Memorandum as an appendix.</p>	Non-compliant	<p>There is no current Framework Document between CoRWM and BEIS.</p> <p>Members have terms and conditions they must follow. There is no current document that sets out CoRWM's remit, governance, how they interact with the Department. The Sponsorship Team has been discussing the need for a Framework Document and we recommend that this is put in place over the next year.</p>
<p>A Sponsor should be identified and there should be regular and on-going dialogue between the Sponsoring Group and the public body. Senior officials from the Sponsoring Group may as appropriate attend committee and/or committee meetings.</p>	Compliant	<p>The BEIS Sponsor Team is well-known to CoRWM and has a good working relationship. There will also be benefit from complementary support, as part of BEIS's transformation programme to improve and strengthen the quality of BEIS's relationship with its partner organisations. This will be through the framework, which provides expert corporate governance advice to the Sponsor Team and CoRWM.</p>
<p><b>Role of the Committee:</b> The Committee of the public body should meet regularly, retain effective control over the body, and monitor the SMT, holding the CEO accountable for the performance and management of the public body.</p>	Compliant	<p>CoRWM is a small Committee of 14 (13 currently) members. It does not have or need an internal governance structure. Governance of the Committee is managed by the Sponsorship Team.</p>

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<p>The committee of the public body should be appropriate in size with membership from a diverse background.</p>	<p>Compliant</p>	<p>Diversity was looked at closely in the last recruitment round – the male/female ratio got better as a result (though diversity across the board could be improved). The size of the Committee is agreed through consultation between sponsors and the Committee, and through processes such as this Tailored Review. The size of the committee is reviewed at regular points when members’ terms come to an end and a decision is taken on whether to reappoint or recruit to maintain the right balance of skills for the Committee to deliver their Work Programme. The diversity of the Committee is monitored by the central BEIS public appointments team and they will place a strong emphasis on attracting applications from a diverse range of backgrounds in any upcoming recruitment. The Committee is seeking to recruit members with different skills which may open up the field to a wider range of applicants than they have attracted in the past.</p>
<p>The Committee of the public body should establish a framework of strategic control specifying what matters are reserved for the board and establish arrangements to ensure it has access to relevant information, advice and recourses to carry out its role effectively.</p>	<p>N/A</p>	<p>CoRWM is a small Committee and does not have a Board.</p>
<p>The Committee of the public body should establish formal procedural and financial regulations to govern the conduct of its business.</p>	<p>Compliant</p>	<p>Guidance on claiming expenses etc. is included in Members’ Terms and Conditions.</p>
<p>The Committee of the public body should make a senior executive responsible for ensuring appropriate advice is given on financial matters, procedures are followed, and that all applicable statutes and regulations and other relevant statements of best practice are complied with.</p>	<p>Compliant</p>	<p>The CoRWM Secretariat based in BEIS has overall responsibility for the Committee’s finance budget, with oversight from the Chair. The Secretariat also ensures correct finance procedures are followed.</p>

Principles of corporate governance	Assessment	Explain
<p>The Committee of the public body should establish a remuneration committee to make recommendations on the remuneration of top executives. Information on senior salaries should be published. The committee should ensure that rules for recruitment and management of staff provide for appointment and advancement on merit.</p>	<p>Compliant</p>	<p>The day rate is agreed by BEIS, the Committee does not decide on levels of remuneration. CoRWM committee members' remuneration is included within the T&amp;Cs and published in the Annual Report.</p> <p>Consideration has been given to CoRWM's gender pay gap. All equivalent members are paid at the same rate.</p>
<p>The Committee of the public body should evaluate annually, including an evaluation of the chair and committee members.</p>	<p>Compliant</p>	<p>The Chair has an annual appraisal carried out by BEIS where Committee performance would be discussed, and an annual meeting with the minister. The Chair undertakes annual appraisals of member performance.</p>
<p><b>Role of the Chair:</b> The Committee should be led by a non-executive Chair, whose duties, roles and responsibilities, terms of office and remuneration should be set out clearly and formally defined in writing. Terms and conditions must be in line with CO guidance and any statutory requirement.</p>	<p>Compliant</p>	<p>This is stated in the appointment letter and associated terms and conditions.</p>
<p>There should be a formal, rigorous and transparent process for the appointment of the Chair, which is compliant with the Code of Practice issued by OCPA. The Chair should have a role in the appointment of non-executives.</p>	<p>Compliant</p>	<p>The recruitment of the Chair follows the code of practice issued by OCPA. The Chair is appointed by all sponsor ministers. The Chair is involved in the recruitment of CoRWM members.</p>

Principles of corporate governance	Assessment	Explain
<p>The responsibilities of the Chair can include:</p> <ul style="list-style-type: none"> <li>• representing the public body in discussions with the Secretary of State.</li> <li>• advising the Sponsor Group/the Secretary of State about committee appointments and performance of non-executive members.</li> <li>• ensuring non-executives understand their responsibilities; are trained appropriately and undergo annual assessments.</li> <li>• ensure the committee takes account of guidance provided by the Secretary of State; carries out its business efficiently and effectively, has its views represented to the public.</li> <li>• develops effective working relationships with the CEO (role of Chair and CEO must be held by different individuals.)</li> <li>• subject to an annual appraisal by the Permanent Secretary or relevant Director General.</li> <li>• appraises other committee members ensuring they are performing to standard, following disciplinary procedures if necessary and ensuring they are committing the appropriate time to the work.</li> </ul>	<p>Compliant</p>	<p>The roles and responsibilities are set out in the Terms of Reference and in the Terms and Conditions.</p>
<p><b>Role of the Chief Executive Officer (CEO):</b> the public body should be led by a CEO, whose duties, roles and responsibilities, terms of office and remuneration should be set out clearly and formally defined in writing. Terms and conditions must be in line with CO guidance and any statutory requirement.</p>	<p>N/A</p>	<p>There is no Chief Executive</p>

Principles of corporate governance	Assessment	Explain
There should be a formal, rigorous and transparent process for the appointment of the CEO.	N/A	There is no Chief Executive.
<p>The responsibilities of the CEO can include the responsibilities of the Accounting Officer, which involve:</p> <ul style="list-style-type: none"> <li>• overall responsibility for the public body's performance, accounting for any disbursements of grant to the public body.</li> <li>• establish the public body's corporate and business plans and departmental targets.</li> <li>• management of senior staff within the public body ensuring they are meeting objectives and following disciplinary procedures if necessary</li> <li>• maintains accounting records that provide the necessary information for the consolidation if applicable.</li> </ul>	N/A	CoRWM does not have an Accounting Officer. Funds to CoRWM, are all managed within the secretariat as a BEIS budget, with oversight from the Chair.
<p><b>Role of the Non-Executive Committee Members:</b> Non-executive members should form the majority of the committee.</p>	Compliant	All members are public appointments. CoRWM does not have an Executive.
Non-executive members should be appointed under a formal, rigorous and transparent process compliant with the code of practice issued by OCPA.	Compliant	All Chair, Deputy-Chair and member appointments follow OPCA guidelines, and are approved by sponsor ministers.
Non-executive members should have their duties, roles and responsibilities, terms of office and remuneration set out clearly and formally defined in writing. Their terms and conditions must be in line with CO guidance and any statutory requirement.	Compliant	Any roles and responsibilities are set out in appointment letters and Terms and Conditions, and in broader terms in the job descriptions outlined in recruitment campaigns.

Principles of corporate governance	Assessment	Explain
Non-executive members should be independent of management.	N/A	
Non-executive members should allocate sufficient time to the committee with details of their attendance published.	Compliant	Members commit to a specific number of days per annum, laid out in the CoRWM Work Programme. The amount of fees they claim during each financial year is published in the Annual Report, which indicates their time worked. Attendance is discussed during annual appraisals. Attendance at Open Plenary meetings is published within the minutes of that meeting.
Non-executive members should undergo proper induction, and appraisals.	Compliant	The Chair is responsible for the work of the Committee and the performance of members, and members receive a yearly appraisal from the Chair. The responsibility for induction lies with the Chair and the Secretariat (on administrative matters).
<p>Non-executive members' responsibilities include:</p> <ul style="list-style-type: none"> <li>• establishing strategic direction of the public body and oversee development and implementation of strategies, plans, priorities and performance/financial targets.</li> <li>• ensuring the public body complies with statutory and administrative requirements on the use of public funds and operates within its statutory and delegated authority.</li> <li>• that high standards of corporate governance are observed.</li> </ul>	Compliant	The duties of Committee members are outlined in the Terms of Reference and Terms and Conditions of CoRWM
Publish on time an objective, balanced and understandable annual report which complies with Treasury guidance, and includes an Annual Governance Statement.	Compliant	CoRWM publish an Annual Report of their work, but as an advisory body, are not required to produce a Governance Statement.
Comply with NAO requirements relating to the production and certification of their annual accounts.	N/A	Not applicable for CoRWM. The budget is managed by the CoRWM Secretariat based in BEIS, so would follow BEIS auditing processes.



Principles of corporate governance	Assessment	Explain
Have effective systems of risk management as part of their systems of internal control.	Non-compliant	There is no formal risk register, but this will be discussed as part of the process to agree a Framework Document, to ensure any new process is proportionate to the size and remit of the Committee.
Ensure an effective internal audit function is established which operates to government Internal Audit Standards in accordance with CO guidance.	Compliant	CoRWM would be included in any BEIS audit processes.
Have appropriate financial delegations in place understood by all relevant staff and stakeholders. Effective systems must be in place to ensure compliance with these delegations and the systems are regularly reviewed.	Compliant	CoRWM budget is managed by the Secretariat.
Have anti-fraud and anti-corruption measures in place, and clear published rules governing claiming of expenses, with systems in place to ensure compliance. Information on expenses claimed by committee members and senior staff should be published.	Compliant	BEIS Travel policy applies to Committee members. The Secretariat processes expense claims in line with this and keeps a record of receipts.
Establish an audit (or audit and risk) committee with responsibility for independent review of the systems of internal control and external audit process.	N/A	The Committee does not spend any money itself; this is managed through the Secretariat who are included in BEIS audit processes.
Take steps to ensure objective and professional relationship is maintained with external auditors.	N/A	Not applicable. The relationship is managed via BEIS.
Comply with BEIS guidance with regard to any department restrictions on spending.	Compliant	Guidance on controls and restrictions is managed via the BEIS Sponsor Team. BEIS' Travel Policy applies to Committee Members.

Principles of corporate governance	Assessment	Explain
Report to Corporate Finance with management accounts and Grant In Aid authorities.	N/A	Not applicable, finances are managed via BEIS. Final receipts are sent to BEIS Sponsor Team for onward processing with finance.
The public body should establish clear and effective channels of communication with stakeholders.	Compliant	CoRWM follows and has a Stakeholder Engagement Strategy, as of 2014, but this has not been updated since. This could be developed when the Framework Document is drafted.
The public body should make an explicit commitment to openness in all activities. Engage and consult with public on issues of public interest or concern and publish details of senior staff and committee members with contact details.	Compliant	The organisation publishes reports and data in the public interest on <a href="http://www.gov.uk">www.gov.uk</a> .
The public body should hold open committee meetings or an annual open meeting.	Compliant	CoRWM holds regular open Committee meetings.
The public body should proactively publish agendas, minutes of committee meetings and performance data.	Compliant	CoRWM actively publishes agendas and open meeting minutes on gov.uk. Performance data is included in the Annual report.
The public body should establish and publish effective correspondence handling and complaint procedures, and make it simple for members of the public to contact them/make complaints. Complaints should be investigated thoroughly and be subject to investigation by the Parliamentary Ombudsman. Performance in handling correspondence should be monitored and reported on.	Part-Compliant	<p>CoRWM does not have a formal complaints procedure.</p> <p>The CoRWM Secretariat has contact details including an email address on their website, so members of the public can contact the Committee with any complaints.</p> <p>CoRWM has not received any complaints in the last year.</p> <p>Correspondence tends to be sent to the Secretariat inbox and is effectively managed, though not formally monitored.</p>

Principles of corporate governance	Assessment	Explain
<p>The public body should comply with any government restrictions on publicity and advertising, with appropriate rules in place to limit use of marketing and PR consultants. Have robust and effective systems in place to ensure the public body is not engaged in political lobbying, includes restriction on committee members attending Party Conferences in a professional capacity.</p>	<p>Compliant</p>	<p>Any restrictions are covered by the Terms &amp; Conditions</p>
<p>The public body should engage the Sponsor Group appropriately especially in instances where events may have reputational implications on the departments.</p>	<p>Compliant</p>	<p>The Sponsorship Team liaises with the relevant BEIS policy teams and the Chair to consider any sensitivities and how best to proceed.</p> <p>BEIS and the Devolved Administrations are keen for CoRWM to preserve their independence, but nevertheless a culture of 'no surprises' is encouraged so the Sponsor Team are aware of any sensitive matters before publication.</p>

## Conduct and propriety

Principles of corporate governance	Assessment	Explain
A Code of Conduct must be in place setting out the standards of personal and professional behaviour and propriety expected of all committee members which follows the CO Code and form part of the terms and conditions of appointment.	Compliant	Committee members agree to a code of conduct and the seven principles of public life when joining the committee. There are CoRWM internal documents relating to ethics and conduct, but some work is required to formalise these documents and ensure they are consistent with the CO Code.
The public body has adopted a Code of Conduct for staff based on the CO model Code and form part of the terms and conditions of employment.	Compliant	Committee members agree to a code of conduct and the seven principles of public life when joining the committee. There are CoRWM internal documents relating to ethics and conduct, but some work is required to formalise these documents and ensure they are consistent with the CO Code.
There are clear rules and procedures in place for managing conflicts of interest. There is a publicly available Register of Interests for committee members and senior staff which is regularly updated.	Compliant	Members declare potential conflicts and interests to the Chair as soon as they arise. These are publicly raised at each bi-monthly plenary meeting and reported in the minutes. A full Register of Interests is published online roughly every 6-months.
There are clear rules and guidelines in place on political activity for committee members and staff with effective systems in place to ensure compliance with any restrictions.	Compliant	Members declare any past affiliations upon application to join the committee and sign up to the Nolan principles of public life.  During General Elections, committee members are given the same guidance as civil servants on restricting political activity.
There are rules in place for committee members and senior staff on the acceptance of appointments or employment after resignation or retirement which are effectively enforced.	Compliant	Standard BEIS rules apply

Principles of corporate governance	Assessment	Explain
Committee members and senior staff should show leadership by conducting themselves in accordance with the highest standards of personal and professional behaviour and in line with the principles set out in respective Codes of Conduct.	Compliant	High and professional standards of behaviour are constantly reviewed and strived for.

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