



Annual Report

2019-2020

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Welcome from our Chair of Trustees



I am delighted to welcome you to this, our first Annual Report. We have given much thought to our obligation to share widely our approach and achievements, and we believe this Annual Report is an important step for us to take.

This report is sponsored by our Members, and has been informed by input from a wide range of stakeholders. It seeks to lay out the progress made during the academic year 2019-20. We want this document to evolve in future years in a very organic way so that we can demonstrate that we are truly accountable to those we serve.

You will know that multi-academy trusts are still a relatively recent arrival on the scene in education in England. Within Academy Transformation Trust, we have always been clear that, as well as our accountability to the Secretary of State and the Department for Education, we see ourselves as primarily accountable to those whom we serve. This means pupils, their parents/carers, our adult learners and those who use our services within the community and local community stakeholders more generally. We also have an accountability to those who work within our organisation, as it is through their efforts that we can deliver the very best education.

Our approach has been revolutionised in the past two years, since the arrival of Debbie Clinton as our CEO. This publication offers her – and our other leaders – the opportunity to reflect on where we have got to in delivering the service that every one of our stakeholders is entitled to expect.

Of course, the 2019-20 academic year was one unlike any other year that we have experienced before. The global Covid-19 pandemic meant that our academies had to adapt and operate in different and unpredictable ways. But you will see from this report that, while we prioritised our ability to respond to this appropriately, we did not divert our attention from our core purpose of **making the biggest difference to the communities we serve through the delivery of top-drawer education.**

We have much more to do, and you will read here about some of our plans for the future; but I hope you will agree with me that this report demonstrates our commitment to excellence and to ensuring that we serve you and your communities as effectively as we possibly can.

Bernard Dickenson
Chair of Trustees



Welcome from the Chief Executive Officer



2019-20 was a keynote year for Academy Transformation Trust. This report describes, in ten key areas, the huge progress that we made during the year in pursuit of our core purpose: **making the biggest difference to the communities we serve through the delivery of top-drawer education.**

I am very proud to present this report – but first, I should clarify something. Academy Transformation Trust only exists because of the 21 academies which, together, form our whole. During 2019-20, I have reflected a lot upon the raisons d'être of the multi academy trust movement, and I have come to just that conclusion.

We are one professional community – and much of the story you will read in this report is about how we have embodied and confirmed that over the course of the past year. In short, we have spent a great deal of this year morphing into 'one trust' with a shared set of common values and approaches which not only seek to deliver the very best education we can provide, but also to empower our people and, crucially, to deliver excellent value for money to the taxpayer.

It may seem pedantic to dwell on this point, but one thing that has been a common theme of the past twelve months is our absolute determination to refer to 'our trust' rather than 'the trust'. Trusts are about giving agency to teachers, leaders and the wealth of other professionals in areas such as finance, governance, estates and HR whose expertise we benefit from.

We are only ever as good as the sum of our parts, but, when I joined our trust as CEO in September 2018, that was most definitely not the approach that I found. Detailed in these pages, very honestly and transparently, is the story of what we were and what we have evolved into. I hope you will also see within the clear signs that we mean business and that we have a clear plan for how we are building on the successes we have already had.

Bernard has already talked about how we view our accountability, and I am proud to work with a group of Members and Trustees who take that commitment most seriously. In the coming months and years, you will see made very real that commitment as we seek to build out our engagement with parents/carers and the local community in a very concrete way. This Annual Report will be available to everyone who interacts with our trust and – for next year's edition, I would welcome



input from anyone who feels they can contribute some thinking to its evolution.

Together with Trustees, I have spent time this year distilling where our absolute focus needs to be. Detailed in our three strategic aims, this comes down to:

- education – delivering the very best quality to enable every one of our pupils or learners to achieve to their highest potential and to develop the qualities and characteristics they will need to be successful in life
- our people – all those who work with us or support us in other ways, for example through volunteering: our duty is to challenge, support, develop and empower our people so that they can deliver the educational outcomes we seek
- our finance and business operations – put simply, the trust movement seeks to deliver efficiencies through joint working so that more can be invested in our core purpose of education, and we expect every aspect of our work to be of as high a quality as our education itself.

I hope you will find much in these pages to both inspire and reassure you about the progress our trust has made – and continues to make.

Debbie Clinton
Chief Executive Officer





Fast Facts about our Trust

Our cross-phase group of academies was founded in 2011 and, since that time, we have grown to our current family of 21 academies (primary/secondary, post-16 and FE) operating across 10 English local authority areas. We are responsible for the education of over 13,000 learners; for the careers of almost 2,000 colleagues; and for the most effective spending of over £74 million of taxpayer income each year.

Strategic Aims

- To plan and deliver a curriculum which enables students to re-integrate with learning, delivers improving progress and outcomes for all learners and demonstrates that lessons have been learned from the pandemic experience.
- To create the conditions in which our people can demonstrate independent, thoughtful and confident behaviours in pursuit of our vision and aims
- To continue to improve our financial performance alongside an enhanced reputation in business operations and governance

ATT Institute

42 Leadership Development pathways across all our directorates

Headline Performance Measures

- Record progress scores for many of our primary academies in 2019
- Rising attainment 8 and progress 8 rates for three years running across all secondary academies
- Rising Key Stage 5 average points scores across all academies for three years



ATT | 21 Academies

Local Authority Areas | 10



Staff | 1857

Primary | 429
Secondary | 1263
Special | 28
FE | 67
Other | 70



Learners | 13,334

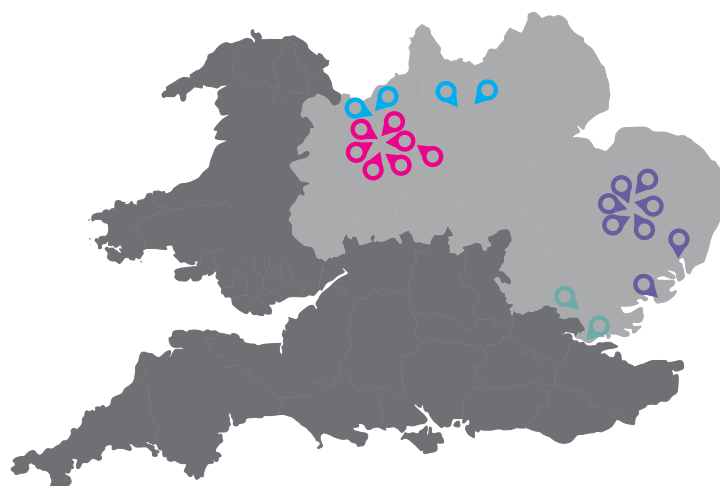
Primary | 2711
Secondary | 9280
Special | 45
FE | 1298



Governance

People Engaged | Over 120
Trustees | 11
Members | 5

Academies Ofsted Rating





Our Vision

We have one core purpose:

To have the biggest positive impact in the varied communities we serve through ensuring top drawer education for our learners. #TransformingLives

How do we ensure this across our trust?

In all we do we are:

1. Ethical to the core, ensuring that education is always front and centre
2. Futures focused system leaders – never simply followers
3. Collaborative in every endeavour
4. Resolutely learner centred

What does this look like across our trust?

Education

We are:

1. Ruthlessly ambitious for all who learn and work with us
2. Unwaveringly inclusive – determined on eradicating barriers to educational success
3. Committed to excellent teaching
4. Determined upon academic excellence for all in our communities
5. Compassionate, ethical and caring advocates for all in our communities
6. Outwardly facing and globally conscious

Operations

We are:

1. Committed to the very best people development and empowerment
2. Determined to shout loudly and share proudly our successes
3. The best professional and technical experts (supporting education) in the sector
4. Committed to the very best understanding and management of risk

Financial

We are:

1. Providing the best possible public service for the best possible value
2. Determined to supplement our public income with shrewd income generation
3. Building financially sustainable models of educational improvement in our communities
4. Demonstrably efficient in all we do

Our Values

- We will work inclusively within our communities, embracing the varied localities we serve while sharing our common vision and values.
- We will develop the very best leaders of the future, working to improve education and transform lives.
- We will adhere unwaveringly to the 'Nolan Principles' of Public Service, which is made clear in our commitment to Ethical Leadership.



Our philosophy – it's all about CSI!

Our approach to academy improvement – in all its aspects – is very simple. It's about Challenge, Support and Intervention.

Through robust **challenge** we swiftly identify and address areas of under-performance, complacency or low expectations. We do this in a number of ways:

- The work of Trustees who receive regular reports and use their professional expertise to challenge what is said
- The work of local governors in scrutinising and monitoring local practice and impact
- Regular monitoring meetings covering wide ranging performance aspects
- Annual, deep dive Full Academy Reviews
- Analysis of data and stakeholder feedback
- Audits of practice and compliance, including 'policy in practice' reviews
- Regular reviews of all aspects of our work, including business operations and finance.

In equal measure, we deliver **support** to academy leaders in a wide variety of ways:

- Through the provision of expert advice and guidance from experienced education leaders
- Through the provision of internally or externally sourced expert guidance in areas such as safeguarding, HR, health and safety and data protection
- Through regular professional development sessions
- Through participation in trust-wide strategic and operational development groups
- By supporting the development of local and professional networks to inform practice
- By providing guidance and a policy framework which ensures they can be confident in their decision making.

In some cases, we identify that **intervention** is needed, where there are particular difficulties. Our approach to intervention is bespoke and always designed to deliver rapid and sustainable improvement.

Our governance

We are a multi-academy trust which is responsible for operating and maintaining a number of academies in England. We are both a company limited by guarantee and an exempt charity, regulated by the Secretary of State for Education.

Our constitution and objects are set out in our *Memorandum and Articles of Association*. We are also bound by the requirements of our Master Funding Agreement, as well as by the provisions of the *Academies Financial Handbook* and a range of other pieces of government guidance and legislation.

We do not have shareholders, but we do have **Members**, who provide the highest tier of non-executive oversight. During 2019-20, we recruited two additional, high calibre Members to our existing group. Our Members have sponsored the production of this Annual Report, as a means of discharging their duty of accountability to our wider stakeholders.

The most important tier of our governance is our Board of **Trustees**. Trustees may either be appointed by Members or co-opted onto the Board by other Trustees. They are Trustees for the purposes of charity law and also fulfil the role of appointed Directors in regard to company legislation.

Trustees are accountable for the performance of our Trust and our academies to the Members, to the Secretary of State and also to the communities served by our academies. They are required to have systems in place by which they can fulfil their legal duties, as well as monitoring and scrutinising the work of the executive.

Trustees also have responsibility for key decision making in respect of aspects of our operations and are required to act, both collectively and individually, in the best interests of our Trust and our academies and in line with our Ethical Leadership statement and other policies. They, along with all those involved in our governance, have a strictly strategic role.

Trustees may not delegate their accountability for the performance of the Trust, but, in practice they do delegate the responsibility for many aspects of our operation as outlined below. Trustees then hold to account the bodies and individuals with 'delegated responsibility' on behalf of the Members, the Secretary of State and the communities we serve.

Our Members



Trustees



Trustees delegate responsibility

- to a range of **Trust Board sub-committees**, each of which consists of a subset of Trustees, may be established either permanently or temporarily and has delegated responsibility for aspects of decision making, monitoring and scrutiny
- to a **Local Academy Committee** for each academy, the membership of which is drawn from the local community (including two parents and one member of the academy's staff) and which has delegated responsibility for the detailed monitoring and scrutiny of the academy's performance
- to the **Chief Executive Officer** ('CEO') who is appointed by the Board and who has delegated responsibility for the day-to-day strategic and operational leadership and management of all aspects of the Trust's activity. The CEO, in turn, delegates responsibility for specific aspects of the Trust's operations to members of the **Executive Leadership Team** ('ELT'), to **Directors of Service** and to **Executive Principals** who are accountable, via the CEO, to the Trustees. The CEO also delegates responsibility for the day-to-day management of each academy to the **Principal** of that academy.





Educational outcomes

This is critical to our core purpose – delivering top drawer education means that all our pupils and learners can achieve to the best of their ability. Although external assessments are not the only measure of a successful education, they are, in our mind, essential if we are to demonstrate that we continue to improve in how we serve our communities.

Where have we come from?

- Our performance in all phases and key stages was very mixed, with great inconsistency and a sense of ‘stagnation’ in some areas
- We had little understanding of how to learn from our best performing academies in areas where more could be done
- We had little consistency in regard to our curriculum, our expectations or our intended outcomes

Where are we now?

- We make no apology for saying we are ‘ruthlessly’ ambitious for all our pupils and learners
- We have aligned our approach to curriculum and outcomes in a formal curriculum statement and policy which reaffirms our commitment in this area
- Our outcomes have improved consistently to a record level (for our trust) in 2019.
- In 2020, although the examination outcomes were not formally monitored (and cannot be compared with previous or subsequent performance for obvious reasons), we delivered a set of professional judgments (Centre Assessed Grades) which required very little moderation and which continued to demonstrate progress. The outcomes are reproduced below for information.

Key Stage 2 outcomes

Combined – Attainment in %			
	2018	2019	2020 Predicted
	Attainment	Attainment	Attainment
ATT	52	44	58
National average	64	65	N/A
Gap from national average	-12	-21	-7 (compared to 2019)

Primary assessments were not undertaken for the 2019 to 2020 academic year and therefore the figures above are based on internal exams, tests and assessments, which have been robustly moderated.

Key Stage 4 outcomes

	2018	2019	2020 (CAG)
Attainment 8	4.2	4.3	4.6
Progress 8	-0.14	0.0	0.26
Basics 9-4	52%	56%	63%

Key Stage 5 outcomes

	2018	2019	2020 (CAG)
A-level avg points	25.9	26.1	37.2
A-level value added	-0.19	-0.27	+0.45
Vocational avg points	26.1	28	31.4
Vocational value added	-0.32	-0.2	+0.11

These outcomes were based in 2020 on Centre Assessed Grades awarded in August 2020. These were robustly moderated.

Academy improvement

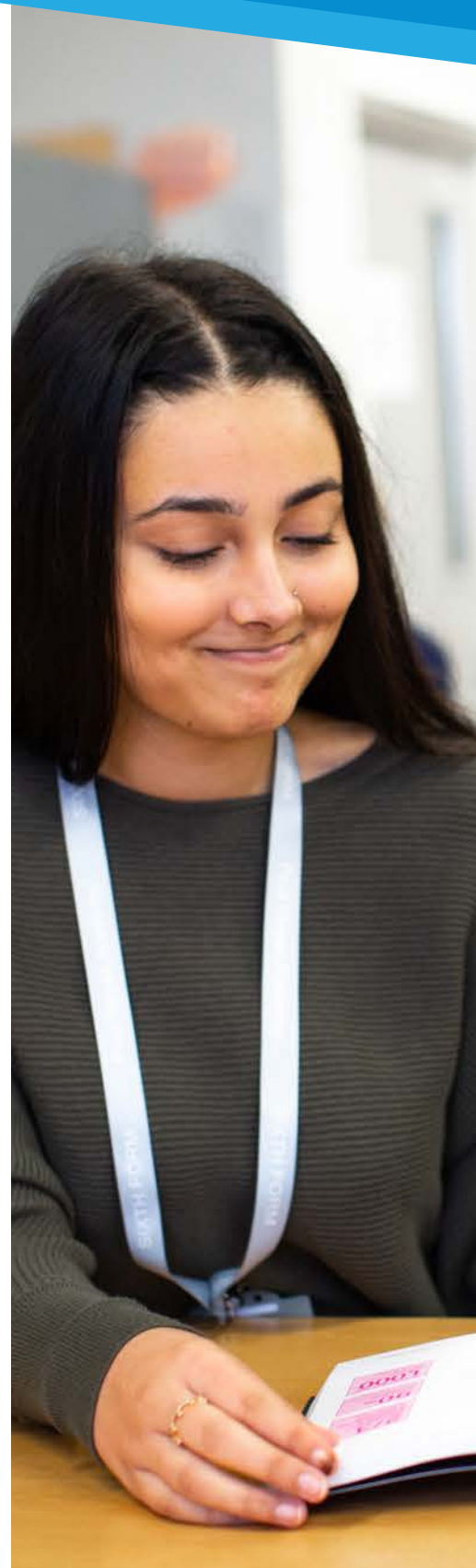
Not content with simply delivering improved outcomes, we believe our duty is to deliver ongoing improvement in all aspects of the work of our academies – this is the very *raison d'être* of our trust.

Where have we come from?

- We had no coherent approach to academy improvement, which meant that some of our academies flourished while others did not
- Our leadership structures relied on individual 'experts' parachuted in when there was a crisis
- Academy principals and local governors felt deeply sceptical about 'the trust' and reported little support for improvement work

Where are we now?

- Our Education CSI model is fully embedded with regular monitoring and reviews in place which help academy Principals to really hone in on the areas for improvement (our annual 'Key Lines of Improvement')
- Our regional and cluster-based leadership models mean that there is always expertise on hand and we are able to draft in additional support swiftly
- Our educational leaders operate as one team, providing expertise nationwide and utilising our very best talent to drive improvements in their areas of particular expertise
- There are regular opportunities for all our education leaders to come together and learn from experts in their field, often people with a national or international reputation
- Local governors are clear about their responsibilities for monitoring and scrutinising all aspects of the academy's work and academy leaders feel supported by governors
- As a result, all of our academies now have a clear sense of purpose and are positive learning environments for all; our internal assessments (based on annual Full Academy Review data) show improvements in all academies from the baseline of September 2019.



Satisfaction

We are clear that our primary accountability is to those we serve – our pupils/learners and our parents/carers. We also have an obligation to our colleagues. It is vital that we not only know how satisfied people are with what we are doing but also that we take action in response to constructive feedback.

Where have we come from?

- We had little information on what our key stakeholders (i.e. pupils/learners, parents/carers and staff) thought about our work
- Anecdotal feedback suggested we were viewed as ‘remote’ and ‘uninterested’ and many, including local governors, were very disconnected from our work

Where are we now?

- We have established a programme of regular surveys of all key stakeholder groups
- In 2019, only 4% of primary pupils and 17% of secondary pupils said they would not recommend the academy to a friend
- For parents/carers, these figures were 12% in primary and 21% in secondary
- We have become much better at handling complaints locally and ensuring that lessons learned from individual situations are applied elsewhere in our trust if applicable
- We are in the second year of our staff survey activity and 89% of staff believe pupils are encouraged to achieve to the best of their ability (compared with 86% last year)
- There has been an increase of 7% in-year of colleagues reporting that our leaders enable them to feel both supported and challenged and 93% of staff believe our pupils and learners are safe in our academies, which represents an improvement on previous years



Professional collaboration

We are one family of academies, populated by some very talented academy leaders, and enabling them to work effectively together means that we are able not only to secure improvement but also to avoid duplication and repetition of effort.

Where have we come from?

- Academy leaders were deeply sceptical about our trust and did not believe they were offered any opportunities to collaborate or learn from others
- There was little, if any, support for academy leaders from elsewhere in our trust
- Other aspects of our work (such as finance, operations and governance) operated in a complete 'vacuum', with little, or no, regard to the local, specific needs of our academies

Where are we now?

- Our Principals Development Group (PDG) is at the heart of our organisation – it meets six times a year with all Principals engaged and is the central forum for professional discussion, debate and policy formulation – Principals report this is a 'very important' forum and vital to their own decision making
- Professionals from all parts of our organisation and at all levels come together on a regular basis in Strategic Development Groups (SDGs) or Team Network Groups (TNGs) to review best practice and to develop common approaches to difficult problems
- Local governors are supported by termly development activities and our half-termly Chairs' briefing in attended by all chairs
- Our reputation in this area has enabled us to attract some of the best talent into key roles within our trust, and these individuals are now having an impact on the performance of our academies



People development and HR

We are only as good as our people. Ensuring that all our colleagues have access to the most effective techniques to help them to do their job and to thrive means that our working environment will be calmer and more conducive to the learning of all.

Where have we come from?

- There was little investment in our people, with development opportunities sporadic and delivering little impact
- There was no trust-wide affirmation of the vital importance of our people to the delivery of our strategic aims

Where are we now?

- Our ATT Institute launched officially during 2019-20 and has delivered a revolution in professional development, with over 2,000 learning opportunities accessed during the initial lockdown period
- We have brought together career pathways for all aspects of our work and deliver a regular programme of webinars and other development opportunities to all colleagues
- We have streamlined our approach to performance development to ensure that all colleagues understand their essential contribution to our core business and established an expectation of ongoing professional learning for all
- In the recent people survey, 80% of staff felt professional development was helping them to be better at their job, compared to only 66% the previous year
- We have a clear focus on the wellbeing of our colleagues, with wellbeing champions in all our academies and a range of initiatives in place



Safeguarding

Our pupils and learners can only learn if they feel safe. Our safeguarding obligations mean we must be proactive in securing both the safety and the wellbeing of our whole community – this is a key tenet of what we do.

Where have we come from?

- Our approach to safeguarding was one of reactive ‘firefighting’ – dealing with individual difficulties on an ad hoc basis, rather than seeking to support and challenge those with safeguarding responsibilities within our academies to operate consistently and to prioritise the wellbeing of all

Where are we now?

- We have secured significant expertise in safeguarding at the heart of our trust and now have a clear understanding of the very best safeguarding practice, summarised in regular guidance and bulletins for all
- We have established a full safeguarding CSI programme which reviews both compliance and cultural aspects of safeguarding; the impact of this is reviewed and overseen by an expert designated safeguarding trustee
- Our designated safeguarding leads, along with other key practitioners, now form part of a very active collaborative group which meets regularly and which peer reviews practice
- We have been able to provide significantly greater safeguarding assurance to external agencies during 2019-20 as a result



Finance

The wise stewardship of public funds is a vital component of the work of any trust – we have an obligation not only to make sure our overall financial position is secure but also to ensure that as much of our funding as possible is directed to where it will have the most impact.

Where have we come from?

- As at 31 August 2018, there was a cumulative deficit of £4.1m
- This meant not only that money was not going where it was needed, but also that our academy leaders (as well as parents/carers and others) had every reason to be sceptical about the ability of our trust to deliver improvements
- Financial planning was poor, with the entire financial operation taking place to a certain extent 'behind closed doors'

Where are we now?

- By 31 August 2020, we had reduced our cumulative deficit to £0.8m
- All financial information is published on our trust website and is scrutinised in detail by both trustees and local governors
- There is now a fully transparent financial and budget planning process which means that each year academy Principals are able to fully understand their financial position and deploy resource to where it is most needed most rapidly
- We have reviewed our approach to the pooling of funding and are now confident that all our resource is directed to where it is needed the most
- We have secured significant efficiency through the use of group-wide procurement contracts, ensuring that services can be delivered at less cost than previously, while not impacting upon education budgets themselves



Estates

As we seek to be at the forefront of educational delivery into the 2020s, it is vital that we have an estate which is fit for purpose and of which we can be proud. This is one of the areas where the multi-academy trust model can really come into its own in enabling some truly innovative work.

Where have we come from?

- We have always had a very proactive approach to developing our estate, but there were significant dilapidations in some academies and, in other cases, the estate did not meet capacity needs or provide a good learning environment
- Support for the resolution of local estates difficulties was not always easy to come by for academy leaders

Where are we now?

- Our condition liability has reduced by over 30% and there are few remaining longstanding defects with which to deal, enabling us to turn to the development of an estate for the future
- Our estates support function has been fully regionalised, ensuring that there is swift access to the expertise required for all academy leaders – this was no more evident than during the Covid-19 response in 2019-20, when health and safety risk assessments described as ‘exemplary’ by external reviewers meant we were able to adopt a measured, but successful, approach to reopening
- We have consistently been successful in securing additional capital funding to that allocated by government in order to prioritise new buildings where needed
- There has been major structural change to over half of our academies in the last three years, reflecting our desire to build to innovate, including a state-of-the art academy and community hub in Suffolk, which is the first development of its kind



ICT

Technology is, of course, both the present and the future and 2019-20 brought this home to us all with something of a shock, as we moved suddenly into the world of remote learning and working. We believe we must learn from the pandemic and ensure access to the best learning technology for all in the future.

Where have we come from?

- We had a very disparate approach to all things technology, with no central structures and each academy operating as an isolated, independent 'island', both in terms of IT support and their online presence
- There was little vision in regard to the sorts of technology we wanted to assure ourselves of

Where are we now?

- We have fully regionalised our IT support structures, ensuring we can maintain frontline support to all our academies
- We have invested to upgrade the IT infrastructure in over half our academies
- We have aligned our IT servers, meaning that we can deliver telephony and broadband services more easily and more efficiently and delivering much needed consistency to our academies' online presence
- We have mobilised a remote learning and working strategy in response to the Covid-19 pandemic and are now able to ensure that learning can continue in the event of any academy closures
- We have used the lessons learned from the pandemic to develop a full blended learning strategy which will deliver benefits in the coming months and years



Governance and compliance

As with any large organisation, our corporate governance is critical to driving improvement, and, in a public service, it is vital that our governance is both ethical and transparent. We must also ensure, ethically, that we are compliant with a wide range of statutory and other requirements.

Where have we come from?

- Our Board of Trustees was not operating as one effective unit and scrutiny of our activity was therefore inconsistent
- There was little support for local governors who felt 'disconnected' from 'the trust' and unclear about their role
- There was little guidance about statutory processes or elements of compliance

Where are we now?

- We have made significant appointments to both our group of Members and our Board of Trustees to strengthen their professional capacity in all areas of our work – the work of the Board is now well planned and consistently enables performance to be thoroughly scrutinised
- We have clarified the role of local governors, recruited more people into these roles and created networks and professional development spaces for them to come together amongst themselves and with Trustees to 'triangulate' information about performance
- We have implemented an approach to CSI in governance which ensures there is guidance and support available while also offering the opportunity for local governance to adapt to local circumstances and community need
- We have reviewed our entire suite of policies and guidance documents, ensuring they will enable us to be compliant in all critical areas of our work



Covid-19

It would be wrong, in this year, to ignore the biggest single thing that has impacted on all of our work – the response to the global pandemic.

We have been very clear throughout this period about two things:

1. Safety is paramount, and this has been embodied in our thorough approach to risk assessments, our adherence to government guidelines and the #safesteadygradual mantra that we have adopted in all our communications
2. Our obligation to ensure that learning continues has meant we have embraced the possibilities of technology and remote engagement in ways we never thought possible.

Our Board of Trustees formed a sub-committee within days of the first lockdown being announced to ensure that we could deliver a co-ordinated response.

Also, within days of the partial closure of schools and academies, we had held two events with academy leaders to discuss our response and had established a pattern of regular, sometimes daily, briefings which continue into 2021.

We asked our people, during the summer of 2020, what their view of our pandemic response was.

- 89% felt we communicated a clear plan of action
- 90% felt well informed as a result of our activity
- 81% felt we had demonstrated a commitment to staff wellbeing throughout.

We are especially proud that, during the autumn term of 2020, pupil attendance within our academies has been consistently 3 or 4 percentage points higher than the national average and also that our levels of staff absence have actually been lower this autumn than in 2019.

The commitment to learning of both our pupils/learners and our people is truly inspiring.





Where do we go from here?

Our vision statement provides the clearest indication of the road we are travelling. We want nothing less than the best for all those whom we serve, and we have more work to do.

Our aims for 2020-2021 are

1. to plan and deliver a curriculum which incorporates lessons learned from the pandemic and delivers improving learner outcomes.
2. to create the conditions in which our people can demonstrate independent, thoughtful and confident behaviours in pursuit of our vision and aims.
3. to continue to improve our financial performance alongside an enhanced reputation in business operations and governance.

In next year's annual report, we will use the following metrics to judge how well we have done.

Aim 1

- Attainment and progress metrics for our pupils and learners in all phases of education
- Attendance measures
- Destinations measures
- Academy categorisation grades
- Engagement with remote learning as the pandemic response continues
- The number of pupils/learners and parents/carers recommending us
- The level of compliance and cultural development in the area of safeguarding

Aim 2

- Data relating to staff absence and turnover
- The number of staff whose experience is positive
- The impact of the work of our ATT Institute
- Evaluations of our performance development activity
- Data relating to the diversity of our people
- Data relating to our resolution of complaints

Aim 3

- Financial data relating to in-year and historical performance
- Efficiency data in relation to resource deployment
- Data relating to our investment in the estate and in technology
- Compliance data in relation to statutory duties
- External evaluations of areas such as governance
- Our ability to grow in relation to income