

Is the government's shareholding in the field of professional theatre and music arts sufficiently justified?

Verification of the implementation of regularity/performance audit recommendations



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Latvijas Republikas Valsts kontrole

Audit report (Verification of the implementation of regularity/performance audit recommendation)

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Is the government's shareholding in the field of professional theatre and music arts sufficiently justified?

Financial audit report "On the accuracy of the annual report of the Ministry of Culture for 2023" regarding the implementation of the recommendations provided after regularity/performance audit No 2.4.1-10/2017 "Does the Ministry of Culture ensure effective management of state-owned enterprises?" in the audit report "What is the role of the state in the field of professional theatre and music arts?".

Investigations carried out based on Audit schedule No 2.4.1-20/2022 of the Fourth Audit Department of the State Audit Office of 16 May 2022 and Audit schedule No 2.4.1-16/2023 of 15 May 2023.

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Why have we drafted this report?

In the Sustainable Development Strategy 2030 of Latvia, the development of Latvia's cultural space is defined as the first priority. The goal set within the priority is to preserve and develop Latvia's cultural capital and promote a sense of belonging to the cultural space of Latvia by developing a competitive national identity based on the creativity of society and creating a high-quality cultural environment in Latvia¹.

Sustainable and publicly available culture for human growth and the development of the nation state are the goal of the Cultural Policy set by the Ministry of Culture².

To provide the sustainable preservation and development of culture as a resource, development planning, persistent and clear progress towards the set goals by defining specific tasks and achievable results are necessary. The provision of cultural services involves creative processes, experiments and creativity. The challenge is to connect the process of creating cultural values with the definition of the basket of services that the society gets from the invested state budget funds, as well as ensuring the effective management control of the state budget funds.

The Ministry of Culture has a tool for implementing cultural policy at its disposal, that is, 14 state-owned enterprises where the Ministry of Culture holds 100% capital shares (hereinafter referred to as SOEs of the Ministry of Culture). The legal form of the SOEs of the Ministry of Culture is a state-owned limited liability company (hereinafter referred to as SOE) and its activities are carried out in the fields of professional theatre, music and circus arts.

The amount of the state budget subsidy granted to the SOEs of the Ministry of Culture increases every year and it constituted 40 million euros in 2023 (See Table 1). Compared to the grant in 2016, its amount has almost doubled.

Table 1.

State budget grant to state-owned enterprises managed by the Ministry of Culture ³										
Year	2016	2017	2018	2019	2020	2021	2022	2023		
Million euros	24.5	25.3	29.6	29.1	33.9	34.8	38.4	40.0		

At the beginning of 2018, the State Audit Office of Latvia completed the regularity/ performance audit "Does the Ministry of Culture ensure effective management of state-owned enterprises?"⁴ (hereinafter referred to as the 2018 audit). The audit covered the period from 1 January 2014 to 30 June 2017 by examining individual audit matters over a longer period of time if necessary.

The purpose of the 2018 audit was to gain confidence that the management of SOEs carried out by the Ministry of Finance complied with the requirements of laws and regulations and good SOE management⁵. The general conclusion of the State Audit Office was that the management of SOEs implemented by the Ministry of Culture was not sufficiently focused on the observance of the principles of good SOE management and improvements were needed (See the State Audit Office's report "What is the role of the state in the field of professional theatre and music arts?"⁶).

To eliminate the deficiencies, the State Audit Office of Latvia provided seven recommendations to the Ministry of Culture in total so that, when conducting commercial activities in the field of professional theatre and music arts, the Ministry of Culture would implement public interests, ensure sufficient control over the implementation of the tasks of state administration delegated to

SOEs, and provide a clear, transparent procedure for calculating grants to SOEs of the Ministry of Culture (See Annex 1).

In this report, the State Audit Office provides an assessment of the implementation of the three recommendations provided to the Ministry of Culture after regularity/ performance audit "Does the Ministry of Culture ensure effective management of state-owned enterprises?" conducted in 2018 and updates one recommendation that was closed as not implemented.

The introduction of the audit report is followed by a description of the situation after the 2018 audit conducted by the State Audit Office of Latvia, a listing of the main basic data on the SOEs of the Ministry of Culture, followed by a summary where the main conclusions and recommendations are summarized.

The part of the audit findings is structured according to the evaluated recommendations in four chapters, presented in the following order:

- Activities of the Ministry of Culture in obtaining data on participants of professional theatre and music arts;
- Assessment of the preservation of state shareholding in SOEs where the Ministry of Culture holds 100% of capital shares;
- Delegated state administration tasks to the SOEs of the Ministry of Culture;
- Employment of employees of the SOEs of the Ministry of Culture.

The annexes of the audit report include the recommendations provided by the State Audit Office of Latvia to the Ministry of Culture in the 2018 audit, the strategic operational goals of the SOEs of the Ministry of Culture, performance indicators and financial indicators of the SOEs.

When drafting this report, methods such as the analysis of laws and regulations, various documents and data were used, including the analysis of data from the annual reports for 2022 of the SOEs of the Ministry of Culture, as well as interviews.

The situation after the audit by the State Audit Office on the management of the SOEs of the Ministry of Culture

In the period after the audit completed in 2018, and the deadlines for the implementation of development planning documents have come to an end, the National Development Plan of Latvia for 2021-2027⁷, has been developed and approved, the Cultural Policy Guidelines for 2022-2027 "Cultural State"⁸ have been prepared and supported, as well as the Government's Action Plan for the implementation of the Declaration on the Planned Activities of the Cabinet of Ministers led by Ms Evika Siliņa⁹ was drafted and approved in January 2024.

In the Latvian National Development Plan for 2021-2027 (hereinafter referred to as NDP2027), one of the six priorities is "Culture and sports for an active and fulfilling life". Its goal is a dynamic range of cultural and sports services available to everyone, which allows developing talents and creating a strong image of Latvia in the world. Two directions of action are outlined in the priority which is "People's participation in cultural and sports activities" aiming at the availability of cultural and physical activities for everyone, increasing the quality of life of Latvian society and "The contribution of culture and sports to a sustainable society" aiming at culture and sports that promote economic and social growth of Latvia by shaping a creative and sustainable Latvian society. In these directions of action, the main tasks and target indicators in the field of cultural

policy are defined, which were used in creating the directions of action, tasks and performance indicators of the cultural policy guidelines.

The Government's Action Plan for the implementation of the Declaration on the Planned Activities of the Cabinet of Ministers led by Ms Evika Siliņa¹⁰ (hereinafter referred to as the Government's Action Plan) foresees a number of tasks and measures to be carried out in the field of culture, including those related to the SOEs of the Ministry of Culture. For instance:

- Strengthened cultural space of Latvia by expanding the availability of diverse and contemporary cultural services throughout Latvia, including the regions;
- Improved accessibility of the environment, cultural content and information of cultural organizations for people with functional disabilities;
- Safeguarded accessibility of culture in the regions by creating cultural facilities and events as activities that activate the economic environment.

The Cultural Policy Guidelines for 2022-2027 "Cultural State" (hereinafter referred to as the Cultural Policy Guidelines) stipulate that cultural policy is one of the most important policies for achieving the long-term goals of the Republic of Latvia, the successful implementation of which is critically important for the identity, development and sustainability of Latvia as a national state, and for the strengthening and preservation of the national language, both for the preservation of cultural values and the heritability of folk traditions, and for the creation of new future cultural values in all cultural sectors. From the recognition that it is culture, along with a language, that is both the reason for the existence of the Republic of Latvia and one of the basic resources for the future growth of the public, one concludes that the cultural offer of Latvia must be available to every member of society, which resonates with the strategic goal set by the Constitution and NDP2027. Therefore, sustainable and accessible culture for human growth and the development of the nation state has been set as the goal of the Cultural Policy Guidelines. Ensuring the availability of cultural offerings plays a key role in achieving the set goal, guaranteeing equal opportunities for every citizen and resident of Latvia to use diverse cultural offerings and actively participate in cultural processes, regardless of an individual place of residence, age, gender, nationality, education or income level¹¹.

For achieving the goal of the Cultural Policy, there are five priorities defined in the Cultural Policy Guidelines: cultural offer available to the public; Active public participation in cultural processes; Preservation and creative use of cultural heritage; Sustainable development of culture and creative industries; Regeneration of talents and professional development of cultural practitioners.

Various organizations are involved in the achievement of goals and the implementation of priorities, both state and municipal institutions and state-owned and municipal enterprises, non-governmental organizations, companies and self-employed creative individuals.

In 2023, the state budget grant to the SOEs of the Ministry of Culture for the implementation of state administration tasks amounted to 40 million euros¹², and its amount increases every year. At the same time, the population in Latvia, including the number of cultural consumers, has a tendency to decrease¹³, and the state administration has also been recommended to reduce the number of SOEs¹⁴. To justify how the implemented cultural policy creates a balance between the mentioned milestones and that society gets the best possible product from the used state budget funding, the Ministry of Culture needs comprehensive, transparent and comparable information not only about its SOEs, but also about the field of professional music and art in general because other organizations also provide services in it apart from SOEs.

Recommendations issued by the State Audit Office of Latvia

Of the seven recommendations provided by the State Audit Office of Latvia after the 2018 audit, three recommendations were implemented in April 2024, and the implementation of other three recommendations had started, but the State Audit Office could not recognize them as implemented, and the State Audit Office had closed one recommendation as not implemented.

Recommendations implemented:

- To ensure compliance with the principle of openness of information, the Ministry of Culture and the SOEs shall create a control mechanism that provides for the timely publication of current information on Internet websites in accordance with the statutory requirements¹⁵.
- The Ministry of Culture shall develop a new or update an existing internal procedure, which would determine the actions to be performed by each official or division precisely and the deadlines for the processes related to the management of capital shares, including the timely development and approval process of medium-term operational strategies.
- To safeguard a clear, transparent and equal grant calculation procedure for the SOEs of the Ministry of Culture, the Ministry of Culture shall develop a procedure for calculating the state budget grant for state-owned "*Latvijas Nacionālā opera un balets*" Ltd (Latvian National Opera and Ballet) and state-owned "*Rīgas Cirks*" Ltd (Riga Circus) and evaluate the possibility of improving the procedure for calculating the grant for state-founded theatres and concert organizations.

When implementing the recommendations of the State Audit Office, the Ministry of Culture has provided more accessible information to the public about the operation of the SOEs where the Ministry of Culture holds capital shares, developed prerequisites for a more coordinated management process of the SOEs and improved the procedure for calculating the state budget grant awarded to the SOEs.

A recommendation closed as not implemented, the relevance of which the State Audit Office draws attention to in this audit:

Evaluate the possibilities of optimizing the administrative functions of state-owned "*Kremerata Baltica*" Ltd and state-owned "*Valsts Akadēmiskais koris* "*Latvija*"" Ltd (National Academic Choir Latvia).

Recommendations, whose implementation had begun and for which a post-implementation verification was carried out during the financial audit "On the accuracy of the annual financial statement for 2023 of the Ministry of Culture"¹⁶:

- (?) The Ministry of Culture shall improve the process of obtaining and compiling data on representatives of the non-governmental sector and their contribution to the field of professional theatre and music arts so that complete data describing the actual situation is taken into account when planning and implementing cultural policy in the field of professional theatre and music arts.
- To implement public interests in accordance with the principles of good management practices of state-owned enterprises when conducting commercial activities in the field of professional theatre and music arts, the Ministry of Culture shall provide the following by re-evaluating the preservation of state shareholding in the SOEs of the Ministry of Culture that, according to the Law on the Management of Capital Shares and SOEs of Public Entity, shall be done at least once every five years:
 - A comprehensive assessment of the field of professional theatre and music arts, (1) indicating public interests that are not provided by the service market, (2) evaluating which of the tools to reduce the market failure shall be used, and (3) evaluating the conditions of fair competition in the field of professional theatre and music arts;
 - A revision of the general strategic goals of the SOEs to provide that the general strategic goal of each SOE is determined according to the specifics of its activity and indicates clearly what the state intends to achieve with its shareholding in each specific SOE.

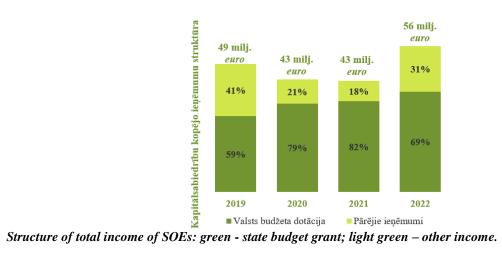
- To safeguard sufficient control over the implementation of state administration tasks delegated to the SOEs and to provide an opportunity to verify the benefits of the state and society from the used state budget funds allocated to the SOEs for the performance of delegated state administration tasks, the Ministry of Culture shall:
 - Revise the set of state administration tasks delegated to the SOEs and the set of achievable indicators, including the goal to be achieved by the SOEs, the measures to be taken, which are suitable for the specifics of the operations of SOEs and linked to cultural policy priorities and available state budget funding;
 - Provide an assessment of the performance of each task delegated by the state administration.

The Ministry of Culture has provided arguments to the State Audit Office of Latvia¹⁷ as to why it believes that the recommendations have been implemented.

- The assessment of the field of professional theatre and music arts conducted in 2020 in cooperation with the Latvian Academy of Culture and "*Analītisko pētījumu un stratēģiju laboratorija*" Ltd (Analytical Research and Strategy Laboratory) identified market participants of each art including representatives of the non-governmental sector.
- The Ministry of Culture follows the current events of each sector regularly, both in cooperation with *Valsts Kultūrkapitāla Fonds* (State Culture Capital Foundation) and non-governmental organizations, whose representatives work in advisory councils of the sectors, including the Latvian Music Council and the Latvian Theatre Council, which are closely related to the submission of proposals in the process of drafting Cultural Policy Guidelines and sectoral strategies.
- In the documents accompanying the laws and regulations on the preservation of state shareholding in the SOEs of the Ministry of Culture, a comprehensive assessment of the field of professional theatre and music art is provided taking into account both the public interest and the conditions of fair competition in the field of professional theatre and music arts. The assessment is largely based on the evaluation of the field of professional theatre and music arts conducted in cooperation with the Latvian Academy of Culture and "Analītisko pētījumu un stratēģiju laboratorija" Ltd in 2020.
- The Ministry of Culture has conducted a review of the general strategic goals of the SOEs.
- An evaluation of the performance of state administration tasks delegated to the SOEs in the period from 2018 to 2020 has been carried out, and the summary has been posted on the website of the Ministry of Culture.
- In January 2021, the Ministry of Culture has concluded cooperation agreements with the SOEs for the period from 2021 to 2023 for the delegation of certain tasks of state administration in the field of culture. They update the state administration tasks to be carried out taking into account the specifics of the operation of each SOE, as well as measurable performance indicators for each task are determined within the available state budget funding.

Basic data on the SOEs of the Ministry of Culture

			2022					
			Kopējie ieņēmumi, <i>euro</i>	Valsts budžeta dotācija, <i>euro</i>	Izrāžu/ koncertu skaits	Kopējie izdevumi uz vienu apmeklētāju, <i>euro</i>		
		VSIA		efte		2		
B		Dailes teātris	6 765 627	3 315 043	234	62		
		Latvijas Nacionālais teātris	5 392 434	3 387 341	414	70		
		Mihaila Čehova Rīgas Krievu teātris	3 732 663	2 307 609	334	56		
	teātri	Jaunais Rīgas teātris	3 544 186	1 829 210	315	50		
	të i	Valmieras drāmas teātris	2 778 864	1 840 693	289	70		
		Latvijas Leļļu teātris	2 197 594	1 624 984	490	50		
		Daugavpils teātris	2 013 232	1 664 408	111	121		
pak	opera un balets	Latvijas Nacionālā opera un balets	15 231 855	11 620 346	235	109		
	¢۵							
彝	ä.	Latvijas Koncerti	4 240 317	3 286 990	238			
	ert	Latvijas Nacionālais simfoniskais orķestris	3 340 910	2 857 797	62	nav salīdzināmi		
	koncert ganizāc	Liepājas simfoniskais orķestris	2 691 775	2 208 513	73			
	koncert- organizācijas	Valsts Akadēmiskais koris "Latvija"	1 544 717	1 381 260	42			
		KREMERATA BALTICA	1 366 012	619 357	45			
	cirks	Rīgas cirks	862 545	464 567	25	112		



Summary

To raise the issue of the management of the SOEs of the Ministry of Culture, the State Audit Office of Latvia has assessed the implementation of the three recommendations provided to the Ministry of Culture after regularity/ performance audit "Does the Ministry of Culture ensure effective management of state-owned enterprises?" conducted in 2018 and updates one recommendation that was closed as not implemented.

The field of theatre and music arts is closely related to creative processes and a certain unpredictability, it hardly obeys the standard forms of reports. As any other field, it is subject to change. It cannot be taken as a self-evident fact that professional theatre and music services in Latvia are provided only by state-owned enterprises and SOEs do it best; this field is changing, diverse, there are many participants. What is happening in the field of professional theatre and music arts? In order to clarify this, the Ministry of Culture commissioned a study in 2020, even though the State Audit Office had recommended improving the process of obtaining and compiling data so that complete data characterizing the actual situation would be taken into account when planning and implementing cultural policy in the field of professional theatre and music arts¹⁸.

As a result of the study, the same problems were identified, which were pointed out by the State Audit Office of Latvia in the regularity/ performance audit concluded in 2018. In addition, the problems are still relevant, especially with regard to the collection of data on non-governmental participants in the field of professional theatre and musical arts.

One should note that the Cabinet Regulation on the collection of statistics in the field of culture of 2017 is still valid, whose implementation is supervised by the Ministry of Culture in the field of professional theatre and music arts. If the provisions were fulfilled, the Ministry of Culture would also have the data characterizing the relevant field at its disposal.

When evaluating the preservation of state shareholding in the SOEs, a public entity must be able to justify that this is the most effective way to implement a task delegated by the public with private legal instruments to ensure the satisfaction of the public needs. At the same time, the state must be able to ensure equal treatment of state-owned enterprises and their competitors in the market, that is, equal conditions of competition must be ensured¹⁹. Therefore, such an assessment shall be based on current data characterizing the field and its participants. After getting acquainted with the assessment made by the Ministry of Culture regarding the preservation of state shareholding in the SOEs, which was supported by the Cabinet of Ministers in September 2022, one can conclude that the Ministry of Culture has not fully used the study it has on the field of professional theatre and music arts to characterize the current situation on the market.

When reassessing the preservation of state shareholding in the SOEs, the Ministry of Culture should pay attention to the observance of the principles of good management practices of SOEs so that it includes all conditions of shareholding assessment that were not included in the 2022 assessment. For example, evaluation of potential alternative mechanisms and evaluation of the legal status of SOEs.

The supervision of the Ministry of Culture over the fulfilment of the tasks delegated by the state administration and the use of the resources of the SOEs requires improvements by linking it to the tasks of cultural policy and government priorities. When justifying the state's shareholding in the SOEs, the Ministry of Culture emphasizes how special and important each of the SOEs is in Latvian culture, but this shall be reflected in the performance indicators of the activities of SOEs, with the

help of which it would be possible to assess the impact of the activities of SOEs in the implementation of cultural policy. The action of the Ministry of Culture as an active shareholder is necessary, not only justifying the existence of SOEs in the field of professional theatre and music arts but also determining, analysing, evaluating and publicizing the results of the activities of SOEs, especially when 71% of the total revenue of SOEs is public financing on average.

When assessing various performance indicators of the SOEs of the Ministry of Culture, the State Audit Office of Latvia has concluded that the requirements set by the Ministry of Culture for the SOEs are contradictory, that is, to achieve a certain amount of revenue from ticket sales and to ensure accessibility to the public. An increase in the amount of own revenues means higher ticket prices, while accessibility means an average ticket price that target groups of society with different incomes are able to pay.

The free ticket policy set for the SOEs is ill-conceived: for representation purposes, they may issue a larger proportion of tickets than for charity. As a result, most SOEs devoted more resources to the promotion of their services than to charitable purposes in 2022, which would ensure access to cultural events for those who cannot afford them. In addition, the different approach to selling tickets at reduced prices does not contribute to the availability of services provided by the SOEs of the Ministry of Culture.

Although one of the tasks of the Cultural Policy is to ensure the availability of culture in the regions set in the development planning documents, one can observe that the arts of theatre, circus, opera and ballet are concentrated in Riga. In the opinion of the State Audit Office, the Ministry of Culture has set a low indicator for Riga theatres, state-owned "*Rīgas Cirks*" Ltd and state-owned "*Latvijas Nacionālā opera un balets*" Ltd - which is the number of performances outside the permanent premises. At the same time, the Ministry of Culture does not collect information on the number of visitors to performances outside the permanent premises, which would allow us to assess how much of the target audience was reached.

During the audit, the State Audit Office received data from the State Revenue Service on the employment of employees of the SOEs of the Ministry of Culture. The data show that every second or 53% of the employees of the SOEs of the Ministry of Culture are employed in one or more jobs.

We draw attention to the fact that 56% of the administrative staff have from one to seven additional jobs, which leads us to assess the workload of the administrative capacity in the SOEs. Therefore, the recommendation given in the regularity/ performance audit concluded in 2018 regarding the optimization of the administrative functions of two state-owned enterprises, which was closed as not implemented, is still relevant and shall be evaluated more widely, and not only in those two state-owned enterprises.

Recommendations to the Ministry of Culture

As a result of the audit, the State Audit Office of Latvia cannot recognize any of the three recommendations not yet implemented of the 2018 audit as implemented. These recommendations are closed, and the Ministry of Culture has been given three new recommendations, as well as updating one recommendation that was closed as not implemented.

The State Audit Office of Latvia issues four recommendations to the Ministry of Culture in total aimed at obtaining and compiling data on the field of professional theatre and music arts as a whole, the availability of transparent and comparable financial and non-financial information about the

state-owned enterprises of the Ministry of Culture, the availability of the services of the state-owned enterprises of the Ministry of Culture to various target groups of society and the assessment of the capacity of administrative resources of the state-owned enterprises of the Ministry of Culture.

References

- ¹ Sustainable Development Strategy of Latvia 2030, approved by the Saeima on 10 June 2010.
- ² Cultural Policy Guidelines for 2021-2027 "Cultural State" (supported by Cabinet Order No 143 "Cultural Policy Guidelines for 2021-2027 "Cultural State"" of 1 March 2022).
- ³ Data for 2016, 2017, 2018 and 2023 from the chronological register of accounting records of the Ministry of Culture, data for 2019, 2020, 2021 and 2022 from the annual reports of state-owned enterprises of the Ministry of Culture.
- ⁴ Regularity/ performance audit No 2.4.1-10/2017 "Does the Ministry of Culture ensure effective management of state-owned enterprises?" by the State Audit Office of Latvia, Audit Report "What is the role of the state in the field of professional theatre and music arts?", available at: https://lrvk.gov.lv/lv/revizijas/revizijas/noslegtas-revizijas/vaikulturas-ministrija-nodrosina-efektivu-kapitalsabiedribu-parvaldibu.
- ⁵ Guidelines on Corporate Governance of State-Owned Enterprises included in the OECD Guidelines on Corporate Governance of State-Owned Enterprises 2015 (*http://www.oecd-ilibrary.org/governance/oecd-guidelines-on-corporate-governance-of-state-owned-enterprises-2015_9789264244160-en*).
- ⁶ <u>https://lrvk.gov.lv/lv/revizijas/revizijas/noslegtas-revizijas/vai-kulturas-ministrija-nodrosina-efektivu-kapital</u>sabie dribu-parvaldibu.
- ⁷ Latvia's National Development Plan for 2021-2027 (Saeima's Announcement on Latvia's National Development Plan for 2021-2027 (NDP2027) of 2 July 2020).
- ⁸ Cultural Policy Guidelines for 2021-2027 "Cultural State" (supported by Cabinet Order No 143 "Cultural Policy Guidelines for 2021-2027 "Cultural State"" of 1 March 2022).
- ⁹ Government Action Plan for the Implementation of the Declaration on the Intended Activities of the Cabinet of Ministers led by Ms Evika Siliņa (approved by Cabinet Order No 55 "On Government Action Plan for the Implementation of the Declaration on the Intended Activities of the Cabinet of Ministers led by Ms Evika Siliņa" of 20 January 2024).
- ¹⁰ Government Action Plan for the Implementation of the Declaration on the Intended Activities of the Cabinet of Ministers led by Ms Evika Siliņa (approved by Cabinet Order No 55 "On Government Action Plan for the Implementation of the Declaration on the Intended Activities of the Cabinet of Ministers led by Ms Evika Siliņa" of 20 January 2024).
- ¹¹ Cultural Policy Guidelines for 2021-2027 "Cultural State" (supported by Cabinet Order No 143 "Cultural Policy Guidelines for 2021-2027 "Cultural State"" of 1 March 2022).
- ¹² Chronological register of accounting records of the Ministry of Culture for the period from 1 January 2023 to 31 December 2023 (retrieved from the accounting program on 25 January 2024).
- ¹³ Study of the impact of cultural consumption and participation "Cultural Activity Barometer 2022", Association of Individuals: Latvian Academy of Culture and "*Pētījumu centrs SKDS*" Ltd (Research Centre SKDS), 2022.
- ¹⁴ Conceptual report on the necessary changes in the management policy of state-owned enterprises of public entities and capital shares of public entities (supported by Cabinet Order No 618 on the necessary changes of the management policy of state-owned enterprises of public entities and capital shares of public entities of 15 September 2022).
- ¹⁵ Section 29.2 and Section 58.1 of the Law on the Management of Capital Shares and State-owned Enterprises of a Public Entity.
- ¹⁶ Financial audit No. 2.4.1-16/2023 on the accuracy of the annual financial statement for 2023 of the Ministry of Culture by the State Audit Office of Latvia.
- ¹⁷ Letter No. 2.1-4/554 of the Ministry of Culture of 8 April 2022 on the implementation of recommendations of audit No 2.4.1-10/2017.
- ¹⁸ Article 4 of Cabinet Regulation No 241 "Regulations of the Ministry of Culture" of 29 April 2003.
- ¹⁹ Initial impact assessment report of the draft law "Law on the Management of State-owned Enterprises and Capital Shares of Public Entities", OECD Guidelines on Corporate Governance of State-Owned Enterprises 2015.