EXECUTIVE BOARD – 20TH NOVEMBER 2018

Subject:	The Development of a Regional Adoption Agency		
Corporate	Alison Michalska, Corporate Director,		
Director(s)/Director(s):	Children & Adult Services		
Portfolio Holder(s):	Councillor David Mellen, Portfolio Holder for Early Intervention and Early Years		
Report author and	Helen Blackman, Director of Children's Integrated Services		
contact details:	Troign Blackman, Brocker of Grimaron Sinkey, aloa Gol Nobel		
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	Criteria for Key Decision:		
• • • • • • • • • • • • • • • • • • • •	Income Savings of £1,000,000 or more taking account of the overall		
impact of the decis	Sion		
and/or			
(b) Significant impact ☐ Yes ☐ No	, <u> </u>		
Type of expenditure:	☐ Revenue ☐ Capital		
	ion: £ 3.42 million over 3 years		
Wards affected: ALL			
	th Portfolio Holder(s): TBC		
Relevant Council Plan Key Theme:			
Strategic Regeneration and Development			
Schools			
	H		
Planning and Housing			
Community Services			
Energy, Sustainability and Customer			
Jobs, Growth and Transport			
Adults, Health and Community Sector			
Children, Early Intervention and Early Years X			
Leisure and Culture			
Resources and Neighbourhood Regeneration			
Exempt information: State 'None' or complete the following			
None.	tate None of complete the following		
None.			
Recommendation(s):			
To approve Nottingham City Council joining a Regional Adoption Agency (RAA) as part of			
a partnership with other D2N2 Local Authorities.			
2. A detailed business case has been prepared and agreed by the Strategic Leads from each			
	rities regarding this proposal and is attached. The Executive Board are		
asked to agree this final Business Case.			
	The Executive Board are asked to formally agree to Nottinghamshire County Council		
being the 'host' Local Authority (this has previously been agreed in principle).			
4. The Executive Board should note that in consequence of Nottingham City Council joining			
the RAA, that there	e will be a workforce transfer to the host authority with effect from 1st		
	ne provisions of TUPE (Transfer of Undertakings, Protection of		
•	ulations - subject to the outcome of formal consultation.		
	elegates authority to the Chief Financial Officer, to determine the		
	ension deficit (currently unknown) within the organisation.		

- establish the East Midlands Regional Adoption Agency (EMRAA), to the Director of Children's Services in consultation with the Portfolio Holder and Lead Member for Early Intervention and Early Years.
- 7. To approve the budget allocation of £1,169,586 per year for three years associated with the RAA.

1 REASONS FOR RECOMMENDATIONS

- As previously outlined in the report to Executive Board dated 22nd May 2018, the Government has stated its intention that all individual local authority adoption agencies be combined into regional adoption agencies by 2020. The rationale is that, with 180 adoption agencies placing children in England, the system is too fragmented, and this has led to delay for children. Regionalisation should improve outcomes for children, adopters and adoptive families.
- 1.2 The principles of regional adoption agencies are:
 - To provide all children with an adoptive family that meets their needs.
 - To ensure that those affected by adoption receive the information, support and advice that they need to understand their adoption journey.
 - To ensure that families are well prepared, enabled and supported to care for the children with plans for adoption.
- 1.3 The aims are to ensure:
 - Early identification of children for whom adoption is the right option
 - Timely placement of children including sibling groups and older children
 - Sustainable placements with timely and appropriate support as needed
 - A sufficient range and number of adopters to meet children's needs
 - A range of different adoptions placement types e.g. foster to adopt
 - A well performing and improving service, evidenced in the adoption scorecard, productivity and timeliness.
 - 1.4 Seven local authorities (Lincolnshire, Leicestershire (also provides adoption services for Rutland), Leicester, Derbyshire, Derby, Nottinghamshire and Nottingham) began participation in the DfE funded RAA programme in October 2015. The EMRAA partnership also includes two voluntary adoption agencies (Faith in Families and Coram). Lincolnshire, Leicester City, Leicester County and Rutland (known as L3R) will not be joining the partnership at present.
 - 1.5 EMRAA has made good progress in developing adoption functions which draw on excellent and innovative practice. Developments include the setting up of permanence teams in many of the partner local authorities and in establishing the D2N2 pilot for Derbyshire, Derby, Nottinghamshire and Nottingham. Good progress continues to be made in aligning ways of working in respect of adopter recruitment, matching and adoption support across the EMRAA footprint.
 - 1.6 BDO the financial consultants engaged by EMRAA, reviewed the local authorities spend on adoption activity. This work provides the basis to set out the business case for the D2N2 to unite as adoption agency in EMRAA.
 - 1.7 One of the key principles of the D2N2 model is that it will be delivered at no additional cost to the authorities involved, although management costs and pension strain considerations remain under review.

2 BACKGROUND (INCLUDING OUTCOMES OF CONSULTATION)

- 2.1 The D2N2 RAA is being developed within the wider partnership of the East Midlands regional adoption agency (EMRAA) project (which includes Lincolnshire, Leicestershire, Leicester and Rutland councils L3R). Options for regional adoption arrangements were considered by the EMRAA project governance board in December 2017 in the context of the preferred approach of each local authority (following consultation with lead members and directors of children's services). The strategic leads of each local authority agreed that the preferred option is to develop a formal RAA for D2N2 and a regional adoption 'arrangement' for Lincolnshire, Leicester, Leicestershire and Rutland councils.
- 2.2 Effectively this provides for a twin-track approach to regionalisation for the EMRAA partnership where D2N2 constitutes a formal shared service and the L3R group seeks to establish protocols in respect of shared recruitment of adopters and matching children to potential families.
- 2.3 The proposed development of the D2N2 RAA meets the DfE requirements of a regional adoption agency. The DfE will consider the L3R proposal and determine whether there is sufficient likelihood of the future development to a full RAA. This consideration will determine the level of future funding to the EMRAA partnership.
- 2.4 The advantages of this approach include:
 - maintaining the momentum of D2N2 partners in developing the RAA following the positive experience of the pilot project focused on permanence teams
 - providing an opportunity to align services across the EMRAA footprint (with the potential to include Lincolnshire, Leicester, Leicestershire and Rutland councils' adoption services at a later date subject to executive approval).
 - The development of both the RAA and the 'arrangement' will maintain a focus on service improvement and outcomes for children across the partnership.

2.5 Governance of the RAA

As set out in the previous paper to the Executive Board paper dated 22nd May 2018, the Project Governance Board, in consultation with lead members and directors of children's services have agreed the attached business case.

The legal agreements will document the arrangement to establish and operate the RAA. An inter-authority agreement will record the nature of the partnership and the principles of joint working that will be adopted by the authorities. There is agreement about the principles for this inter-authority agreement but the final decision on whether to proceed will depend on the final legal agreement and the outcome of consultation. There is a planned review of the agreement and the operation of the agency after one year, with a break clause at three years before entering an evergreen arrangement.

The agreement will document the commitment by Nottinghamshire County Council to provide the adoption services on behalf of the RAA to an agreed specification, together with the commitment by Derby, Derbyshire and Nottingham City Councils to provide the child care and permanence work to an agreed specification to support the work of the RAA. The funding mechanism for the RAA, risk sharing and partner payments terms will also be clearly outlined.

The inter-authority agreement will set out the expectation that decisions of the partnership board will be by consensus and in the event of a dispute that cannot be resolved by the partnership board, the issue will be referred to the Chief Executives of the partner local authorities to consider.

The Inter-Authority Agreement will also detail arrangements to dissolve the partnership and provide for the proposed governance structure.

2.6 Staffing and funding of the RAA

The Project Governance Board, in consultation with lead Members and Directors of Children's Services, considered the potential options available for the transfer of staff to the RAA, namely secondment or TUPE transfer of staff to the host local authority. After considering the legal advice obtained, it was agreed in principle that staff would transfer to the host organisation under the principles of TUPE.

A review of staff in scope, conducted across the four local authorities in early September 2018 identified 79. 4 full-time equivalent staff in scope for the RAA. At most it is estimated that there are approximately 5.90 FTE over the preferred establishment. Nottingham City Council have identified 17.6 full-time equivalents (FTE) to transfer, which is 0.4 FTE over the initial budget indication. This will be vacancy managed until the point of transfer. In order to ensure that resource remains appropriate until the point of transfer, management within each of the local authorities have agreed to work together to temporarily fill any gaps.

Each local authority within the proposed partnership have held engagement events, as well as informal consultation/information sharing meetings with staff and trade unions. Nottingham City Council held an event on 25th September 2018, sharing the rationale for the forming of an RAA as well as the implications for staff in the event of proceeding on the basis of a transfer of staff under the TUPE (Transfer of Undertakings, Protection of Employment) Regulations.

The host authority have given assurance within the business case (4.3) that there will be no redundancies pre or post-transfer, as a result of the initial over-staffing and that the additional cost will be absorbed into the year 1 operating budget. They have outlined that there will be a move toward the preferred RAA staff establishment over the first two years of operation via vacancy management.

Initial due diligence has been provided to Nottinghamshire County Council in order to assist them in establishing any measures which may be required and formal consultation is planned to commence on 19th November 2018, subject to the approval of the proposals by Executive Board.

<u>Pension:</u> An initial actuaries valuation of the deficit has been requested and is currently being progressed by Nottinghamshire County Council Pension Administrators. As staff would transfer to the host authority 'fully funded', there likely to be a 'deficit' amount which will require allocation internally. However, there is no expectation of a cash payment to Nottinghamshire Pension Fund as a consequence of a staff transfer. In the event that the City Council leaves the Partnership, there is an expectation that staff would transfer to the new employer fully funded.

The cost of the actuaries valuation has been borne by the RAA project funding in order to assist the decision making process. As there has been no final agreement as to which staff would transfer, this can only be an estimate and a further

valuation would be required on the basis of the final staffing list, at the point of transfer.

2.7 The remit of the RAA and potential benefits

The D2N2 RAA will be part of the East Midlands regional Adoption Agency EMRAA and, as a minimum, provide the following adoption services:

- Tracking of children for whom adoption may be the plan for permanence. The
 establishment of permanence teams within each of the D2N2 local authorities
 provides a standard model which will inform the RAA on the potential needs of
 the child early in the planning process and enable improved targeted recruitment
 of adoptive families. Earlier, appropriate, placement of children is likely to reduce
 spend on looked after children budgets.
- Recruitment of adopters to meet the needs of D2N2 children for whom adoption is the plan for permanence.

The D2N2 group of local authorities placed an average of 282 children for adoption per year between 2012 and 2015 of which 57.5% were placed with adopters from the home authority. An average of 104 children per year (37%) were placed with adopters from local authorities outside the EMRAA partnership or with voluntary adoption agencies.

An analysis of inter-agency costs and income for the year 2015-16 indicates a net expenditure on inter-agency adoption placement fees of £1,537,000 for the D2N2 group, Nottingham City's element of this is £282k.

To achieve good adoption outcomes for children we will be able to place more children for adoption at no additional cost. The fee for placing children outside our local authority has increased recently by £4,000 per child to £31,000.

Increasing the number of children placed in house or within our new RAA area, is also likely to assist in improving outcomes for children through the provision of local timely and appropriate adoption support to families.

Panels for approving adopters.

Work has taken place to understand the cost and frequency of running an Adoption Panel. As a result there will be five Adoption Panels running throughout the region for all members of the RAA. It remains a reasonable expectation that this shared resource will assist in the reduction of panel costs as well as reducing delays to decision making.

Adoption support

The D2N2 group of local authorities spent £1,347,000 supporting adopted children and adoptive families in 2015/16 (including staff costs). Nottingham City's staffing costs for post adoption support will be dependent on the final decision regarding what is and what is not delivered by the RAA but, based on the current most likely model are £67,931. The non-staff costs for adoption support during this period was £325k of which £210k was funded by the Adoption Support Fund. Access to the Adoption Support Fund will cease in 2020.

The D2N2 RAA is likely to assist in sustaining (or improving) adoption support provision through economies of scale and joint commissioning of therapeutic support.

Further discussion and analysis has taken place to determine whether or not the remit of the RAA should include the following functions:

- Adoption allowances
- Letter box (post adoption contact)
- Step parent and inter-country adoptions
- Foster to adopt and concurrent adoption placements
- Addition Panel functions (e.g. matching and agency decisions, legal and medical advice)

It has been agreed that the step-parent adoption and inter-country adoptions will remain the responsibility of the individual Local Authority Some services such as Fostering for Adoption will be a joint function.

2.8 Nottinghamshire County Council propose to charge a management fee to host the RAA. This is currently set at 7.5 % and is detailed within the Business Case.

3 OTHER OPTIONS CONSIDERED IN MAKING RECOMMENDATIONS

- 3.1 The DFE have stated that there is now a national expectation that all Local Authorities will form a Regional Adoption Agency by 2020. A range of models have been considered with the one proposed in this document appearing to offer the best potential to meet local need.
- 3.2 Alternatives may include joining a different RAA but this would add further distance to visiting and supporting children in placement and the money that has been provided by DFE to help with the project management costs was provided to the East Midlands local Authorities to work together.
- 3.3 We have considered not joining the RAA but this would leave us vulnerable to being compelled to join an RAA perhaps not of our choice in the near future.

4 FINANCE COLLEAGUE COMMENTS (INCLUDING IMPLICATIONS AND VALUE FOR MONEY/VAT)

- 4.1 The total budget for the D2N2 group is in the region of £5.324m per annum.
- 4.2The proposed contribution by Nottingham City Council (NCC) is a total of £3.432m over a three-year period. Contributions per year are:

7.1.1 Year 1 £1.170m 7.1.2 Year 2 £1.171m 7.1.3 Year 3 £1.091m

- 4.3 Department of Education has granted up to £0.900m to help establish an East Midlands Regional Adoption Agency (EMRAA).
- 4.4 The reduction in year 3 assumes the EMRAA will make £0.795m savings by reducing the cost per unit of adoption orders. Each authority's share is dependent on their individual unit cost. NCC will receive a lower benefit compared to other partners due to a low unit cost.
- 4.5 Contributions include a 7.5% management charge (£0.082m) relating to central back office functions on behalf of the lead authority. Clarification of services included is required.

- 4.6 The aim of the project is to deliver the EMRAA within the current funding envelope however; this cost exceeds the existing adoption budget.
- 4.7 The service expects to breakeven by year 3, however confirmation of funding is required in relation to the additional £0.082m for years 1 and 2.
- 4.8 The EMRAA will manage the risk and absorb costs associated with increased adoptions.
- 4.9 There are no redundancies planned following transfer of staff to the EMRAA. The additional £0.393m due to the variation of staffing will be absorbed into the year 1 operating budget.
- 4.10 Further analysis is required to ascertain:

4.10.1: Pension strain costs

4.10.2: 7.5% Management contribution

4.10.3 : Exit costs

- 4.11 Actuarial assessments are required to determine the impact of the pension deficit liability. The DfE grant will cover the overall EMRAA assessment, however as NCC have requested an individual assessment there is likely to be a cost to NCC.
- 4.12 A report proposing the introduction of a pension strategy is due at CLT next month.
- 4.13 Pension liability is a significant financial risk to the organisation, and should be included in the risk register.
- 4.14 A robust governance structure is required to determine roles and responsibilities, in particular, responsibility for determining the apportionment of liabilities between local authorities.
- 4.15 Pending the outcome of the financial risks, delegated authority to:
- 4.15.1 Director of Childrens Services in consultation with the Portfolio Holder for Early Intervention and Early Years to negotiate and agree the terms of the Inter-Agency Agreement and to establish the EMRAA
- 4.15.2 Chief Financial Officer to determine the allocation of the pension deficit.

Christine Green, Finance Business Partner 25th October 2018

- 5 <u>LEGAL AND PROCUREMENT COLLEAGUE COMMENTS (INCLUDING RISK MANAGEMENT ISSUES, AND LEGAL, CRIME AND DISORDER ACT AND PROCUREMENT IMPLICATIONS)</u>
 - 5.1 Employment-related Legal Comments (Jon Ludford-Thomas (Senior Solicitor, Commercial, Employment & Education Team)) 25.10.2018
 - 5.1.1 As the Employment-related Legal Comments for the previous report to the Executive Board in this matter identified, there was the possibility that the creation of the Regional Adoption Agency ("RAA") could entail a relevant

transfer under the Transfer of Undertakings (Protection of Employment) Regulations 2006 ("TUPE"), with the contracts of employment of affected staff automatically transferred by operation of TUPE to the host organisation, Nottinghamshire County Council.

- 5.1.2 The Employment & Education Sub-team of Legal Services understands from Human Resources ("HR") that Nottingham City Council ("NCC") officers consider that TUPE is likely to apply here and, to that end, HR have commenced the information and consultation process with the representatives of affected NCC employees in accordance with TUPE. Therefore, it is advisable that if the decision is taken to approve NCC entering into the RAA this information and consultation process is progressed. It is also advisable that the pensions implications referred to in the Employment-related Legal Comments for the previous report in this matter are properly considered and addressed.
- 5.1.3 Lastly, it is advisable that NCC considers carefully the potential equality issues arising from all aspects of the proposals here in order to demonstrate consideration of and compliance with NCC's public sector equality duty under the Equality Act 2010. Therefore, it is advisable that one or more Equality Impact Assessments is conducted by NCC on these proposals as soon as possible.

5.2 Children's Social Care Legal Comments (Claire Knowles (Team Leader, Children & Adults Legal Team)) 25.10.2018

To assist with the background to what was initially a government backed initiative, in 2015 the Department for Education (DfE) reported that local authorities should be working towards Regional Adoption Agencies (RAA) by 2020. Their commitment to this approach is such that the Education and Adoption Act 2016 (the 2016 Act) gave the government a power to direct a local authority to enter into a RAA. The Act amends the Adoption and Children Act 2002,(the 2002 Act) so that local authorities are no longer required to maintain an adoption service within their area, but may secure provision by other local authorities or registered adoption agencies.

The new section 3ZA of the 2002 Act, gives the Secretary of State the power to direct individual local authorities to make arrangements for adoption functions, including:

- (a) the recruitment of persons as prospective adopters;
- (b) the assessment of prospective adopters' suitability to adopt a child;
- (c) the approval of prospective adopters as suitable to adopt a child;
- (d) decisions as to whether a particular child should be placed for adoption with a particular prospective adopter;
- (e) the provision of adoption support services.
- to be carried out by another local authority or one or more adoption agencies on their behalf, through the formation of regional or sub-regional adoption agencies.

Separate meetings are in hand looking at the Legal Adviser and Medical Adviser roles to the Adoption Panels.

In relation to the Legal Adviser role this will 'follow the child' and therefore the Nottingham City Legal Advisers will give advice on Nottingham City only

cases even if they are heard at another authority's Adoption Panel within the RAA. Similarly, Nottingham City Legal Advisers will only advise the Nottingham City Agency Decision Maker. This applies to all four RAA authorities and their Legal Advisers.

Claire Knowles, Team Leader, Children & Adults Legal Team 25.10.2018

Contract and Procurement comments - Andrew James, Team Leader (Contract and Commercial)

This report recommends that Nottingham City Council joins the D2N2 Regional Adoption Agency ('RAA'). The RAA will not be a separate legal entity. Nottingham City Council will rely on the power given to local authorities in the Adoption and Children Act 2002 to arrange for the provision of its adoption services by another local authority. The proposal is that the adoption services will be provided by Nottinghamshire County Council with the effect that RAA will be led by Nottinghamshire County Council. There is no requirement to undertake a procurement to commission Nottinghamshire County Council to provide the adoption services.

There will be an inter authority agreement setting out the responsibilities of each partner authority which is participating in the RAA. The agreement will identify the adoption services which are being provided by Nottinghamshire County Council. The report states that the agreement will be for an initial term of 3 years and after that the agreement will continue on an 'evergreen' basis – that means the agreement will roll-over indefinitely unless an authority wishes to leave the RAA. The agreement therefore needs to include the process for how an authority may choose to leave the RAA by giving notice and also whether there are circumstances where an authority can be excluded from the RAA. In either case the agreement must build in sufficient time for the exiting party to make its own arrangements for providing adoption services. The agreement should set out the allocation of costs and liabilities between the partners. This will include payment of the City Council's contribution. The Legal Services team will assist the DCS in the negotiation of the agreement.

Andrew James Team Leader Commercial, Employment and Education 24.10.2018

5.3 <u>HR OBSERVATIONS – MARIE READ (HR CONSULTANT) AND LYNN ROBINSON (HR BUSINESS LEAD)</u>

- 5.3.1 A regional EMRAA HR Group established in January 2018, has been tasked to consider workforce options and associated employment risks for the delivery of shared regional adoption services. This model is to be based on a host organisation model, which has been agreed as Nottinghamshire County Council.
- 5.3.2 It has been agreed in principle to form a Regional Adoption Agency (RAA) and all D2N2 Local Authorities are in the process of seeking formal approval to implement with effect from 1st April 2019. As a result of this and through both legal and HR input/advice, it has been established that the forming of the RAA will result in a staff transfer to Nottinghamshire County Council in accordance with the principles of TUPE (Transfer of Undertakings Protection of Employment) Regulations. The HR Group have been able to identify the

staff in scope to transfer and Nottingham City Council has discharged its responsibility to inform staff and local Trade Unions of the proposals.

- 5.3.3 The RAA (Version 4.2) business case currently identifies at 4.1.8 that any costs relating to future redundancies would be apportioned equally between the partners (i.e. 25%). The issue of cost requires further clarification as to how this will be considered including the scope and period of time that any such may be applied. This is particularly relevant as post-transfer decisions will be made by Notts County Council as the host employer. This potentially creates a financial risk for the authority who will be obliged under an Inter-Agency Agreement to share the financial costs of decisions made by the employer. This might include elements such as redundancy compensation payments, associated pension strain, where release of pension benefits is applicable and other employment related liabilities including compensatory payments awarded by an Employment Tribunal.
- 5.3.4 In light of potential liabilities around shared responsibility for compensatory payments or any associated payments linked to redundancy, it is strongly recommended that Nottingham City Council's Legal Services provide scrutiny of the Inter-Agency Agreement, that is being drawn up by external legal advisors on behalf of the host organisation, to be provide clear advice to the Director of Children's Services on the extent of any liabilities and risks to the organisation to enable informed decision to be made.
- 5.3.5 Assurance has been given by the Notts CC that there will be no redundancies related to current identified surplus staffing in the proposed structure. It has been agreed that this will be managed through vacancy management and that TUPE principles will apply.
- 5.3.6 The actuaries valuation currently being undertaken will be the deficit value at the point of transfer (as at 1st April 2019) and will not take account of future pension strain in the event of redundancies made. A further evaluation would be required to understand the impact should redundancy cost be shared between the Partners.
- 5.3.7 Initial due diligence has been provided to Notts County Council and any measures are being formulated. It will be for the host authority to lead on consultation on measures as a result of the transfer.
- 5.3.8 Consultation with staff and Trade Unions is planned to commence on 19th November 2018 (30 days) led by Notts County Council as the host Authority, subject to the agreement of the recommendations put to the Executive Board Members.
- 5.3.9 Future liabilities and risk for Nottingham City Council including that of the pension deficit, should be negotiated as part of the Inter-Agency Agreement, including those associated with any agreed exit strategy.

25th October 2018 Lynn Robinson (HR Business Lead) Marie Read (HR Consultant)

6 Comments of Recognised Trade Unions

6.1 Comments from Unison are:

We are concerned that although the stated aims of Regional Adoption Agencies are very positive, that this could be a precursor to privatisation by parcelling up adoption agencies into bigger organisations. We would hope that if at any point this was proposed, that Nottingham City would strongly oppose this.

We seek clarity on the consultation arrangements (see comments in report By HR) and the role of Nottingham City Council in the consultation. Paragraph 5.38 refers only to the role of Nottinghamshire County Council in the consultation process and not the legal obligations of Nottingham City Council.

We seek clarity on issues around the fact that the RAA will have staff potentially on four different sets of pay, terms and conditions and the implications of this. Also what pay arrangements, terms and conditions will new staff be recruited on.

We will no doubt have many more questions and points needing clarification during the initial consultation process and beyond.

Unison 07th November 2018

7.1

7 EQUALITY IMPACT ASSESSMENT (EIA)

No	X□
An EIA is not required at this stage because: A key performed to ensure appropriate ethnicity and cultural matches to children, ensuring all health needs and equality issue	petween adopters and
through the adoption support offer and a strong focus	•

Has the equality impact of the proposals in this report been assessed?

8 LIST OF BACKGROUND PAPERS RELIED UPON IN WRITING THIS REPORT
(NOT INCLUDING PUBLISHED DOCUMENTS OR CONFIDENTIAL OR EXEMPT INFORMATION)

outcomes for children for whom adoption is the plan for permanence. When

8.1 Business Case and Executive Summary

the position regarding staffing will be developed

9 PUBLISHED DOCUMENTS REFERRED TO IN THIS REPORT

9.1 Executive Board Report dated 22nd May 2018