

Teachers' Pension Scheme Pension Board (TPSPB)
TWENTY-SIXTH MEETING: 20 October 2021 (By TEAMS Teleconference)

MINUTES

Present:		Also Attending:	
Neville Mackay (Chair)	NM	Richard Giles (Head of TP)	RG
Susan Anyan (Independent Pension Specialist)	SA	Danielle Barker (TP, Head of Operations)	DBa
David Butcher (employer representative)	DB	Amy Gibbs (TP, Head of Governance and Risk)	AG
Kate Atkinson (member representative)	KA	John Brown (DfE Head of Policy Projects)	JB
Heather McKenzie (member representative)	HM	Jeff Rogerson (DfE Head of Assurance and Planning)	JR
Julie Huckstep (member representative)	JH	Sue Crane (DfE Senior Contract Manager)	SC
Ian Payne (employer representative)	IP		
John Pratten (employer representative)	JP		
Jackie Wood (employer representative)	JW	Secretariat	
Peter Strike (member representative)	PS	Kathryn Symms	KS
Simon Lowe (Employer representative)	SL	Helen Cowan	HC
Chris Jones (Member representative)	CJ	Kelly Elliott	KE
Iain King (Director, DfE)	IK		
Peter Springhall (Acting Deputy Director, DfE)	PSp		

	Item	Action
Agenda item 1	<p>Introduction, attendance, apologies:</p> <ul style="list-style-type: none"> NM welcomed everyone to the meeting, in particular, Peter Springhall, the acting Deputy Director of the Teachers' Pensions Division, as a new board member. He also welcomed Danielle Barker – TP's new Head of Operations. NM proposed to the Board that SA should chair any future meetings if he was unable to do so. The Board agreed that, as SA is an independent board member, this would be an appropriate arrangement. NM also advised the Board that a recruitment exercise was underway for two new (employer) board members. <p>Minutes of the previous meeting (Paper 2):</p> <ul style="list-style-type: none"> The minutes were agreed as an accurate record of the meeting of 14 July 2021. <p>Register of Interests (Paper 3):</p> <ul style="list-style-type: none"> NM noted that the register had been updated ahead of the meeting and that none of the declared potential conflicts precluded anyone from participating in the meeting. 	
Agenda item 2	<p>Actions update (Paper 4):</p> <ul style="list-style-type: none"> The Board noted that all actions arising from the last meeting in July were fulfilled and closed, with one exception. The Department and TP were to consider whether the Six 	

	<p>Strategic Objectives' engagement measure regarding complaints was appropriate.</p> <ul style="list-style-type: none"> • SC advised the Board that the measure is linked to some work she is doing with TP to review the complaint handling KPIs, and she will update QSB in December and TPSPB in January on her proposals. 	AP2/140721
Agenda item 3	<p>Cross Cutting Strategic Issue – Key HR Issues and Future Ways of Working</p> <ul style="list-style-type: none"> • RG explained that the majority of TP staff have been working from home since March 2020, and that in some ways this arrangement had been more efficient. That, coupled with regular staff surveys that have shown that most staff enjoy homeworking, has led to the decision to adopt a blended approach to working arrangements to take account of staff preferences and business needs. • Contact Centre staff returned to the office in July 2021. From 9 October, the Senior Management Team returned to the office, along with other teams that benefit from being together - for example Project Teams and the Engagement Team, where collaboration aids their effectiveness. • It is anticipated that 90% of staff will adopt the blended approach. • Recruitment is ongoing across the UK, however, the capacity in Darlington will be maintained. • RG explained that staff turnover and sickness absence were generally at an acceptable level compared with other organisations. He noted that whilst the Contact Centre had a specific issue in March 2021, it was now performing as expected. • The bereavements team had also failed to meet their SLA targets which had appeared to be due to an increase in deaths. However, a deep dive into the administrative process had revealed that the process did not match the SLA requirement. This has been addressed and this, coupled with newer staff now being fully effective – means that the SLA performance is on track. • RG expected that enhanced capacity planning, cross-skilling and recruiting ahead of need on the Contact Centre, would ensure a good quality service to members. • He also reassured the Board that he was comfortable that recruiting across the UK would be successful. He also highlighted Capita's apprenticeship programme as a positive step to attract new staff. He also advised that two training managers were being recruited in recognition of the large number of new staff joining TP over the coming months. • DBa confirmed that apprenticeships were offered to a range of employees – from new administrators with no pension qualifications to more experienced staff, such as herself. • RG was content that the model will be successful, and that it is better than the pre-COVID model. • NM asked RG to explain the strategic context for the future ways of working – the main HR challenges and how the model will help resolve those. • RG confirmed that the Transitional Protection project is the most 	

	<p>significant challenge. The 50% increase in activity creates specific issues, such as recruitment and training.</p> <ul style="list-style-type: none"> • He also confirmed that culturally, his desire to maintain a highly skilled and motivated organisation was important. • RG agreed with NM that balancing BAU and project work was also a challenge for the organisation. This is managed by ensuring that project work is kept at that level until it crosses over to delivery – for example, there will be new Transitional Protection delivery teams ready to pick up the work as soon as it becomes BAU. • NM sought further reassurance on the knowledge and experience levels within TP. RG assured the Board that loyalty to TP was high, with some staff being employed by Capita since 1996 when the work was first outsourced. 85-90% of staff have more than one year's experience and 40% more than five years' service. • SL asked whether recruitment outside Darlington would be to existing Capita facilities and whether there were any risks associated with recruiting outside Darlington. • RG explained that Capita exists across the UK, but that flexible or homeworking contracts were going to be offered. This has been shown to be effective provided there are well-defined processes in place and workflow management and QA checks were maintained. • RG identified staff well-being as a risk with this approach because there is less support from colleagues. Also missing new ideas and suggestions – normally picked up in the office environment – was a risk, therefore team meetings would take place regularly in the office. • KA requested more information about the Contact Centre training and QA processes. DBa explained that Contact Centre training had more recently been delivered in a classroom environment. This had been positively received. This is now being trialled with other teams. Quality checks are exactly the same as before because call recordings can be played wherever the managers are based. • SA requested further information about the strategic overview – for example, BAU v project work; operational staff v management; and retention strategies. • RG explained that there were improvements to career pathways – and that is being made clearer to individuals. Additionally, a new competence framework for administrators had been developed, and the Business Analyst framework had been refreshed. These frameworks enable teams to be better managed and for individuals to take control of their own development because they know what is expected of them. • RG went on to describe the pyramid structure in operation for Transitional Protection teams. The project lead, Alex Mitchell will have two operational managers and eventually ten teams of 12-15 people, all with a team manager. Managers will be recruited on internal promotion as well as externally. • PS enquired whether there is any risk of the age profile of staff leading to many knowledgeable and experienced staff leaving 	
--	--	--

	<p>together. RG acknowledged that staff will leave, but that there are no concerns of a sudden exodus. Knowledge transfer is key and is being addressed.</p> <ul style="list-style-type: none"> • In terms of recruitment, TP had successfully filled 30 posts for Goodwin work recently, but RG acknowledged that the market is difficult because there is lots of work being done in the pension industry at present. RG explained that TP do not necessarily recruit only those with pensions' experience. For example, advertisements for team managers may specify a requirement for previous management experience, but not necessarily pensions knowledge. • NM noted that many of the Board's questions related to the bigger picture ie a strategic view, which was of interest because of the link to performance. NM and the Department will consider when a further paper about strategic challenges and how the operating model is appropriate to tackle those will be commissioned. 	AP1/201021
Agenda item 4	<p>Independent Pension Specialist Update:</p> <ul style="list-style-type: none"> • SA discussed the Pensions Dashboard and noted that Capita was one of the providers participating in the Alpha phase of the programme. • JR agreed that Capita's involvement in the Alpha phase was positive. He reassured the Board that the technology and data are in a good place but explained that timing was an issue – ie the practicalities of processing Transitional Protection cases and the desirability of uploading information to the Dashboard that will change as a result of those calculations. There are discussions taking place with the Department for Work and Pensions (DWP) regarding these issues. The expectation is to go live towards the end of 2023, although the Department would prefer a later date, if possible. • SA referred to the Pension Regulator's (TPR) Code of Practice and preparing for the Regulator's single Code. SA said that the Code of Practice contains a requirement for trustees to perform their own risk assessment (ORA), although SA noted that it was not yet clear to what extent this was compulsory for the Public Sector. • SA commented that the ORA tests whether the measures in place to manage risks are appropriate and that there is effective scheme governance. There is a requirement for the ORA to be audited either internally or externally. • SA added that the Code of Practice had not yet been finalised, although when it comes into effect, Schemes will have one year to make appropriate arrangements. • JR said he was comfortable that the Department was in a good place regarding governance arrangements and has pushed back at the TPR regarding some of the terminology being confusing for the public service schemes – as did the other public service schemes and as a result DWP will be making clear the requirements on them next year. • NM suggested that the Code could be discussed at a later date, and asked the Department to consider who would own and carry out the ORA, and what the independent audit arrangements 	AP2/201021

	<p>might be.</p> <ul style="list-style-type: none"> • SA discussed the Pensions Regulator’s Equality, Diversity, and Inclusion Strategy. SA mentioned that the Board might like to challenge themselves in this area. • NM emphasised the importance of Board delivery, as well as conduct regarding Equality, Diversity, and Inclusion. He proposed that this topic would be a deep dive paper. • NM commented on the consultation regarding reform of data protection. He asked if the Department intended to respond to the consultation exercise. NM noted there was a lot of sensitive data held by the TPS and was concerned that there would be a significant reduction in the strength of various controls that exist to ensure data is properly protected. • JR advised that the Department’s security team will be responding to the consultation. He noted that its aim was to gain a better balance between protecting individuals and the ability of organisations to meet compliance. JR felt that the consultation was not aimed at reducing protection, but to ensure organisations were strategically thinking about how they were complying. There will be no compulsion to remove current arrangements and JR assured the Board that the Department would remain mindful of the need to protect individuals. • The Board was reassured by JR’s comments. 	AP3/201021
Agenda Item 5	<p>Scheme Advisory Board (SAB) Update:</p> <ul style="list-style-type: none"> • JB explained that Goodwin is no longer a SAB agenda item as the project is now BAU, with TP processing casework. • SAB continues to discuss the Transitional Protection project, with a sub-group discussing the various policy options in more detail. The Scheme going forward aims to ensure the best pension scheme to members, minimising any potential impact on employers and on administration. • The Department is currently working through a number of proposals, but bearing in mind that various legislation is yet to go through Parliament. • Flexibilities available through the Career Average Scheme will no longer be available to members when members are rolled back into the Final Salary Scheme. The sub-group has spoken about how to ensure all members have the right information about flexibilities, whilst avoiding information overload. • Discussions will continue into 2022 and will be further informed once the legislation is in place. • The Department is developing Regulations to close the Final Salary Scheme on 31 March. All active members move into the Career Average Scheme on 1 April 2022. There will be a consultation exercise in early 2022, accompanied by member communications. • SAB is interested in when communication with members will take place regarding those in immediate detriment and when TP will begin to reassess cases. SAB want to develop a strategy for starting those communications to members in the new year. • KA mentioned that clear messaging was essential to help avoid 	

	<p>confusion and member contact.</p> <ul style="list-style-type: none"> • SAB is also discussing the rules around minimum pension age. It is expected that the minimum pension age will remain at 55 for certain members, but for others the age will rise. The government plan normal minimum pension age stays within 10 years of NPA but the regulations are yet to be finalised. • NM queried whether the political considerations will affect the delivery of the solution of Transitional Protection. JB confirmed that ongoing conversations about taxation, for example, in relation to annual allowance calculations may have an impact. However, planning is going ahead on what is known. • JB assured the Board that the right level of planning is happening – currently assuming that work will begin in October 2022 and being completed by 2025. Whenever the work actually begins, the plan is to complete the work by April 2025. RG reiterated that the re-planning work for Transitional Protection will be completed within three weeks. • JR confirmed this is being managed through the Transitional Protection Project Board which feeds into the Programme Board. Preparatory work is already happening, and as progress is made on IT development, the solution will be flexible between IT capability and resources. • NM enquired whether the new ministerial team were aware of TPS issues. PSp advised that briefing packs had been provided to them, and that Minister Walker will have a further “teach-in” session within the next few weeks. • JR updated the Board on the 2016 Valuation cost cap control mechanism. The final directions have now been published by Treasury, and GAD is still working through them. The expectation is that there will be no change to member benefits, and from an administration point of view, that will mean there will be comparatively little for TP to do, other than manage communications. There is a risk that other schemes could be challenged once the outcome is confirmed. • In terms of 2020 Valuation, the two consultations have now closed, the cost control mechanism and the SCAPE Discount Rate. • For the cost control mechanism, Treasury has published the outcome, broadly in line with the consultation. There are three main changes. The most controversial is the introduction of an economic check if benefits go up or down beyond the agreed limits. This involves a formulaic check against the economic position to see whether those breaches should be addressed or not. • The result of the SCAPE consultation was delayed due to a change in Chief Secretary to the Treasury. The Department would like to see the link with GDP severed. The SCAPE consultation will have the biggest influence on the final result of the 2020 Valuation - due to be implemented in 2024 – and he undertook to keep the Board fully up-to-date with developments. 	
Agenda	Management Advisory Group (MAG) update –	

item 6	Agreed that this would be discussed under AOB.	
Agenda item 7	<p>Service Delivery & Maintenance of Data sub-committee update:</p> <ul style="list-style-type: none"> • JW stated that there were three main areas the sub-committee considered - bereavements, contact centre and deferred members. • JW advised that the first two areas were covered by earlier discussion at agenda item 3; and that she agreed the position in both cases was more positive but would continue to be monitored. • At the last TPSPB, the Board questioned the possibility of conducting a tracing exercise for deferred members. The Department produced a report for the sub-committee which was issued to all Board members. It showed that a tracing exercise was conducted in 2015, which resulted in a low number of submitted claims from deferred members. • JW advised that a 'leaver pack' was now issued to members leaving the scheme, which highlighted the importance of maintaining contact. This had resulted an increase in deferred members registering on My Pension Online (MPO). • The Department had also altered the scope of OM 14. This monitored the percentage of active and pensioner members with MPO accounts. The measure would also monitor the registration of deferred members going forward. • JW mentioned that guidance on the TP website could be improved, as it was felt that information on deferred members was difficult to locate and the language was not always clear. This action was suggested for consideration under the Information to Members and Communication Sub-Committee. • Another deferred member exercise was considered to be inappropriate due to a need to focus on other important work, such as Goodwin and McCloud. JW said that the sub-committee was reassured by the review of OM 14 and a review of guidance on the TP website. • NM asked if the amendment of OM 14, to include deferred members, would be a contractual obligation for Capita and would there be a threshold/target to meet. SC confirmed that this was the case. • NM noted the significant improvements to bereavements and staffing issues in the contact centre, but was concerned at the length of time it had taken a year for those improvements to be implemented and become visible. • RG advised that he would generally expect a six-month recovery period for a serious performance issue, to allow for recruitment, training and clearing any backlog of cases. Although this would potentially vary from team to team. • In line with that timeframe, RG noted that the contact centre issue was identified in the first quarter of the year and was resolved by the end of August. • He acknowledged that the Bereavement issue took longer to resolve. Although COVID-19 clearly affected performance, he felt 	

	<p>that it had masked the process issue that the deep dive had revealed. The lesson to be learned from the experience was to conduct a deep dive earlier in the process to identify the underlying issue sooner.</p> <ul style="list-style-type: none"> • SC mentioned that although there was a service level let period between April 2020 and July 2021, her biggest concern had been the backlog build up. She noted that the backlog has been significantly reduced. • NM thanked RG and SC for their comments and asked for questions from the Board. • DB questioned whether there was a sense of complacency from the Department about lack of contact details for deferred members. Whilst NM agreed with the sub-committee's conclusions, he recognised it was important to guard against complacency. He therefore suggested the Department committed to reviewing the position every 18 months. • SC agreed to this review and emphasised the importance of the amendment to OM 14 to include deferred members' MPO monitoring. She commented that it was vital to contact members as they left the scheme and issue a leaver pack. The website was also going to be reviewed through IM&C sub-Committee. • HM agreed that issuing the leavers pack was important. She understood that tracing was difficult, and suggested a newspaper advertisement could be considered. HM raised whether there were equality issues to be considered. • JW agreed to consider the advertisement at the next SD&MoD sub-committee meeting. • SA felt that an update to TP's website combined with the Pensions Dashboard may help solve the problem. NM agreed. • JR disagreed that the Department is complacent regarding deferred members. Many of the members involved were beyond retirement and therefore extremely difficult to trace. He agreed that the website required an update on deferred member guidance and the importance of contacting members at the point of leaving the scheme. He noted that data collection would also help the situation, as the scheme now held email addresses for many members, which offered some future-proofing and informed members of their rights. 	
<p>Agenda item 8</p>	<p>Managing Risk and Internal Controls sub-committee update:</p> <p>Programme Management</p> <ul style="list-style-type: none"> • SA drew the Board's attention to the Executive Summary paper. The Programme, which runs until April 2025, mainly focuses on Goodwin and Transitional Protection, though there are wider elements that the Programme manages such as MCR. • SA noted that some Transitional Protection casework rescheduling had been required, but that the Programme remained on track, subject to any legislative delays that may necessitate further re-planning. • SA also referred to the Programme Management Risk Update paper – which sets out the three main cross-cutting risks in detail – Commercial delays, Policy delays and Resourcing. • She noted that all three risks were rated as amber. However, the sub-committee were assured by the commercial agreements that 	

	<p>were in place and in train; and by the planning for timely recruitment of staff. The timing of policy decisions was more difficult to control, but the sub-committee has been reassured that further re-planning could take place if needed, with a view to the Transitional Protection project still being completed by the end of the current contract.</p> <ul style="list-style-type: none"> • SA noted that TP were processing casework in an efficient manner to ensure that members impacted by more than one policy change were dealt with in a logical order. • The Programme Board has in place all the appropriate controls, risks and interdependencies to ensure that Programme saturation is well-managed. • PSp explained that recent scenario planning and accurate assessments of “burn down” rates had also helped to assure him, as SRO, that the Programme remains on track. <p>Assurance on Resourcing</p> <ul style="list-style-type: none"> • SA reported that the sub-committee had discussed resourcing in detail, but that the matter had already been covered under agenda item 3. <p>Finance update</p> <ul style="list-style-type: none"> • SA reported that End of year Certificates (EoYC) were being returned more slowly than usual because of summer holidays and staff working from home – but even so, TP had received around 93%. TP were targeting employers who needed support and larger employers to increase the membership covered by EoYCs was maximised. • SA explained that not as many employers as was expected have onboarded to MCR. It is likely that the April 2022 target will not be achieved. This presents a very limited risk to scheme finance because TP will still get the data, contribution and assurance they need via the existing process. • The Accounts were laid on 21 July and were unqualified. A lessons learnt exercise is underway. TP met their OBR August deadline. Transitional Protection is the big issue for forecasting. OBR has adopted a consistent approach across all schemes affected by that, by commissioning GAD to provide all public scheme data. 	
<p>Agenda item 9</p>	<p>Information to Members and Communications sub-committee update:</p> <ul style="list-style-type: none"> • JH reported that the sub-committee had looked at two communications plans - Transitional Protection and the transition for all active members to CARE on 1 April 2022. • The timeline is updated as necessary and the programme of communications developed. The plan started last year with the public consultation, and it is mapped out to 2025. • Timing of legislation may impact the plan and therefore it is flexible. Key messages from the communications plan will feed into the overarching engagement plan so key messages can be delivered as BAU to try and avoid overloading people with too many messages. 	

	<ul style="list-style-type: none"> • Key audience groups have been identified so that TP will ascertain who needs to know what and when. For example, even those not affected will need to be told that. • NM referred to JB’s earlier update and that he had mentioned SAB was asking about communications for both Goodwin and Transitional Protection. He asked if the work of the sub-committee is being shared with the SAB - KS confirmed that this was the case. • JH explained that there had been a soft launch of LivePerson - a development of webchat which allows members to discuss personal accounts, rather than just posing general questions There is a Whatsapp option too. • DBa confirmed that the soft launch had gone well. Full release is planned for early November. The feedback from members and colleagues has been extremely positive. • JH mentioned there has been an increase in employer feedback compared to the previous quarter. • NM queried if that was because employers were getting back to operating in a more normal manner. SC confirmed that it was a combination of going back into the office, but also because TP is maximising the opportunities to get feedback. She confirmed that the employer satisfaction feedback had improved; and more employers were giving feedback. • NM thanked all sub-committee Chairs for their updates. 	
<p>Agenda item 10</p>	<p>TP Update (Paper 11):</p> <ul style="list-style-type: none"> • AG reported that the main focus had been on the summer retirement exercise, bereavements, remediation and contact centre. • TP has been doing some in-depth reviews on bereavements, also looking at complaints and revisions. There are a couple of areas where there have been challenges in KPIs and SLAs. These are much improved in the last quarter and the tracker highlights that TP is keeping up with the casework they are receiving during the quarter. • NM mentioned that the statistics are very encouraging and the challenges over the last year or so have improved, as evidenced in the statistics for the last two quarters. • NM asked Board members whether a quarterly report was still required, as the dashboard details the operational performance. • JW, DB and JH all noted that the detail of the report is very useful for sub-committee meetings. However, DB suggested that it might be useful for each sub-committee Chair to talk to SC regarding what is the most useful information. • SL and CJ echoed that the report is a useful reference guide for the sub-committees. • SC suggested from DfE perspective Annex B was a drain on resource. This involves her team trawling through the minutes of several monthly meetings and highlighting key points in a presentable manner. • HM agreed that the report should not create unnecessary work, and understood that duplication was undesirable. 	

	<ul style="list-style-type: none"> • JR confirmed the work and QAing that is required to ensure the report provides context and accurate and informative detail. He suggested sub-committee Chairs give some thought to how they use the information in the report; a key element in streamlining the report. • NM suggested an item on the next sub-committee agenda to give the sub-committee a chance to clarify with DfE staff what aspects of the report they find useful and if there is scope to streamline the report. • NM thanked TP colleagues for attending the call. 	AP4/201021
Agenda item 11	<p>Commercial sub-committee update:</p> <p>TP colleagues left the conference call.</p> <p>The remainder of this section has been removed to ensure commercial sensitivities are maintained. A full set of minutes (and actions) will be produced from the sub-committee meeting, which took place on the morning of 19 October 2021 and will be shared with Board members. A full version of the minutes will be prepared and shared with Board members, and at the next TPSPB meeting.</p>	
Agenda item 12	<p>Any Other business:</p> <ul style="list-style-type: none"> • NM thanked IP for his contribution to the Board over the past few years and sent the Board’s best wishes. IP returned the thanks to Board members, and said he appreciated the learning and being part of the group and wished them all the best for the future. • NM proposed that face-to-face meetings should recommence in April 2022, subject to Government guidance at that time. He asked Board members contact him if there were any concerns. He was meeting sub-committee Chairs in November to discuss how sub-committee meetings would be held in future. • KA asked if there was a possibility of blended Board meetings. NM acknowledged some meetings may need to be hybrid but tend to work better if most people are in the room. • JH preference would be face-to-face meetings, they work better and avoid issues with wi-fi. SA agreed that they are better for debate and decision making, but those attending for only part of the meeting or those who vulnerable should be able to join remotely. Other Board members agreed. • JR referred to an earlier discussion about bereavements and the contact centre. Both are complex areas to resolve hence the time taken to recover and he suggested that performance may be difficult to maintain in the long term. He suggested any follow-up HR paper should provide information about teams where getting people up to speed is more difficult. • JR discussed MAG and the Teachers’ AVC scheme. Generally MAG was pleased with the fund performance. There were one or two below benchmark in the current year, but still high performing. The main item was service delivery issues that the 	

	<p>Prudential has had in the last year, which led to poor service to members – particularly call centre complaints and dealing with cases to required timelines.</p> <ul style="list-style-type: none"> • He said that MAG listened to the recovery plan that the Prudential has in place, and they were pleased with progress made. This affected very few teachers, as most of their activity and difficulties were other people desperately wanting to access their money quickly to support with reduced pay and redundancy. • One of the difficulties is that they have moved to a new platform that has created some issues. The new platform requires information from employers to be 100% correct before it can be submitted. Prudential is working with individual employers to resolve those issues and streamline going forward. • JR expects performance to be back on track soon and is keeping close contact with MAG on that issue. It was agreed that JR would provide more information on service delivery on a regular basis. 	
	<p>Neville concluded by thanking everyone for attending and for contributing to an interesting and productive meeting.</p> <p>The next meeting will take place on Wednesday, 19 January 2022.</p>	

Minutes agreed: *Neville Fackey*

Date: 26 October 2021

<p>Minutes circulated to Board members for review 1 November 2021. The following changes were made following Board member review.</p> <p>No amendments were requested/made.</p>
<p>Minutes ratified at subsequent TPSPB –</p>

Final Signature: *Neville Fackey*

Date: 19 January 2022