

LOCAL PENSION BOARD

AGENDA ITEM 3

MINUTES OF THE CAMBRIDGESHIRE LOCAL PENSION BOARD

Friday 31st January 2020

Members of the Board in attendance:

Employer Representatives – County Councillors E Meschini, S King (Chairman) and Parish Councillor D Payne

Scheme Member Representatives - D Brooks (Vice Chairman), B O’Sullivan and J Stokes

Officers in attendance:

C Blose - Employer Services and Systems Manager

M Oakensen - Governance Officer

J Walton - Governance and Regulations Manager

M Whitby Head of Pensions

R Sanderson - Democratic Services Officer

Time: 10.00 am to 12.10 pm

Place: KV Room, Shire Hall, Cambridge

**ACTION
BY**

134. APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST

There were no apologies for absence.

John Stokes queried whether from reading the guidance on declarations of interest there was a need to make any declarations at each meeting. It was clarified that a member of the Board did not have to declare any already listed in their declarations form at every meeting. *(Note: Some members of the Pensions Committee chose to do it and if they did, they would be included in the minutes but it was not a requirement if already included on their declarations form).* The Chairman also just reminded the Board that when considering an item on the agenda if a member realised they had a prejudicial interest this could be declared at that point.

135. MINUTES OF THE PENSIONS FUND BOARD 4th OCTOBER 2019

The minutes of the meeting of 4th October 2019 were approved as a correct record and signed by the Chairman.

136. MINUTES ACTION LOG

The Minute Action Log was noted.

Page 23 Minute 96 Cambridgeshire Pension Board Effectiveness Review actions (including review of Terms of Reference) - As this had now been delayed from the current meeting to the April meeting this would still need to pick up the original request from the October meeting that **the Board should see an early draft to enable them to comment and suggest any additional changes in advance of its publication. Action**

Jo Walton
/ Michelle
Oakensen

Page 23 Minute 121 - Local Government Chronicle Investment and Pension Summit Update – with reference to Environmental, Social, and Governance (ESG) investment considerations, it was highlighted to the Board that the next Pension Investment Sub-Committee on 20th February would be receiving a report setting out the Pension Fund's position on responsible investments. In addition, the scheduled July training session to which all Committee and Board members were invited, would be discussing ESG. Following this Members would be asked to complete a survey, the results of which would help in building a Pension Fund ESG policy.

Councillor Payne indicated that he was not able to attend the July training session but would wish to receive the materials for the training session and to be sent the survey to enable him to complete and return it. Action. He commented that it was a fast changing situation which required early actions.

Jo Walton
/ Michelle
Oakensen

Barry O'Sullivan asked whether the Pension Committee would be declaring a Climate Change Emergency. This could be looked at as part of the discussions but up to now, it had been councils declaring the emergency rather than individual pension fund committees. Further to this discussion there was a request for **officers to check whether any other Pension Committees had declared a Climate Change Emergency and report this back. Action:**

Mark
Whitby

Page 24 Minute 122 - Valuation of the Pension Fund

Regarding the text reading that David Brooks should in future like councillors Payne and King be provided with hard copies of the Pension Committee agenda David indicated he did not remember making this request, but stated that he had not received any Pension Committee papers. On discussing this further at the conclusion of the meeting with the Democratic Services Officer, he indicated that he would be happy to receive the Pension Fund Committee papers in future but only as an e-mail link via adding **his email address to the CIMIS Pension Fund Committee e-mail distribution list. Action:**

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Dawn
Cave to

Page 25 Minute 125 Governance and Compliance Report breakdown of the cost of the last four training days that the Fund had held – Further request from David Brooks

An updated document was tabled at the meeting and is included as an appendix to the minutes.

Page 28 – Minute 131 Access Asset Pooling Update Future Access Joint Committee Meetings dates

As an update Democratic Services indicated that the December meeting had been provided to the Board which was the only one available at the time, but literally that morning Democratic Services had been furnished with a list of

further dates which had already been emailed on to the Board. The dates were: 9th March, 8th June, 7th September, 7th December and 8th March 2021.

137. MINUTES PENSION FUND COMMITTEE 10th OCTOBER 2019 AND 14TH JANUARY 2020

The last two Pension Fund Committee minutes had been provided to the Board for information and were noted.

Issues raised.

10th October Minutes - Minute 164 Valuation of the Fund

It was highlighted that a democratic decision had been taken to continue with the Designating Bodies Pool, while recognising that a number of bodies were significantly under contributing. The question was asked if there was any plan b) for them. The Committee had been given a Democratic choice either for Plan A - disaggregating the pool, or Plan B - retaining the pool. No back up plan was needed as one of the viable options had been chosen.

Further to this discussion the question was raised on whether it would be more appropriate to show an ongoing deficit rather than the cessation valuation. It was explained that the ongoing deficit valuation hid the true position as it would show a lesser value and that it was the cessation value that set out the full deficit and would be what an employer would be required to pay if they left the Fund. In terms of the risk involved, it was not a risk to the Fund itself, but mainly to the employers as under-payers would be expected to fund themselves. In answer to another follow up question on whether there should be an item on the Risk Register, it was explained that it was below the threshold, and as already indicated, the risk was with the individual employers.

14th January 2020 Pension Committee Minutes

Minute 176 Anti-Fraud and Corruption Policy Review - Noted that an incorrect reference was made to Mr Stokes being the Chairman of the Pension Fund Board

- Minute 176 Review of the Effectiveness of the Pension Committee - Page 4 – with reference to the text in the second bullet and members asking if there was any training for recently retired members on how to use the portal, David Brooks suggested that a video should be produced that could be viewed on Youtube. John Stokes agreed that the portal was not particularly user friendly, giving the example that if the wrong password was accidentally put in, a member could be locked out for several days. In answer to a query, it was confirmed that facial recognition was not being considered at the current time. Councillor Payne also agreed that the Members Self Service facility was not easy for people to find their way around and supported the idea of a two minute video to show exactly where members should go and would be a very useful and cost effective, additional tool. Cory Blose the Employer Services and Systems Manager indicated that this suggestion could be looked at as part of the accessibility review to be undertaken in October. **This was agreed as a Board requested additional action:**

**Cory
Blose.**

It was agreed that although no members of the press or public were present, should any one enter the meeting late and there was discussion of the confidential appendix 4 to the next report, the Board would need to pass the resolution to exclude the press and the public as the appendix contained business sensitive information.

138. ADMINISTRATION PERFORMANCE REPORT

This report provided details of a number of key areas of administration performance for consideration by the Board.

Key issues highlighted included:

- The tables in Appendix 1 which provided an update of the Fund account, investment and administration income and expenditure against the cash flow projection outlined in the Annual Business Plan.
- For the period 1st September to 31st December 2019 the Fund had met 18 out of its 24 monthly targets. Four of the six targets missed related to payment of retirement benefits from active status for the reasons given. It was highlighted that over the period volumes of payment of retirement benefits from *deferred* status, not currently reported as a Key Performance Indicator (KPI), had been very high. As this represented an ever-increasing area of responsibility as the Fund matured, a new KPI for this area of work was to be introduced in 2020-21. Full KPI details of were set out in appendix 2 of the report. The backlog on unprocessed leavers had risen to 7,000 resulting from employers not having told the Fund about employees leaving employment. The system was being changed so that in future it would no longer be necessary to receive their notification. Letters had now gone out to employers to ask them to provide monthly employee information and this was to be included in next Year's Business plan with AON continuing to undertake some of the work which would involve paying them a higher amount as the contract agreed was not a fixed cost contract and they had, had to undertake a great deal of additional follow up work with employers.
- Appendix 3 showed that 99% of employers in the Cambridgeshire Pension Fund had paid their employee and employer contributions and/or submitted their schedules on time for the period 1st December 2018 to 30th November 2019.
- Regarding breaches of the law, section 5 highlighted that there had been no material breaches and two non-material breaches, with details provided and the course of action that was to be taken.
- Section 6 detailed the activity undertaken in relation to the Internal Dispute Resolution procedure. The administering authority decisions that had been appealed since 1st April 2018 was set out in Appendix 5.
- Section 7 showed that there had been one overpayment of significance and the action that was to be taken.
- Section 8 highlighted details of the recently concluded 2019 independent data audit. It was highlighted that a number of data improvement activities were under-taken during the period between the two audits which would have contributed to the improvement in both sets of scores. However the increase in the number of unprocessed leavers which Officers felt was appropriate to report to the Pensions Regulator as both common and scheme specific data fails, was not a statistic

some other authorities were including in their audits. As a result this data had offset the activity improvements. It was highlighted that the data used to calculate the data scores was taken before the results from the mortality and address tracing project had concluded. Once the results of this project had been fully verified, it was expected that the quality of the member address data would improve and reflected within the common data scores. In addition, the conclusion of the contracted-out reconciliation project, currently scheduled for March 2020, would further increase the quality of the scheme specific data scores.

- Section 8.2 of the report set out details of the progress update on the Data Improvement Plan 2019-20. Regarding contracted-out liabilities reconciliation. All queries had been submitted to Her Majesty's Revenue and Customs (HMRC) by 31/12/2018. However HMRC were still in the process of resolving queries, despite previous targets dates for completion having been given of April and June 2019.
- Officers had recently processed a number of queries in response to issues raised by HMRC to facilitate the rectification stage of the exercise and for the final data file that HMRC would be issuing confirming the final contracted-out liability held by the Cambridgeshire Pension Fund. The file had been expected to be ready by the end of 2019. However, on 9th January 2020, HMRC issued a statement confirming a delay in issuing the final data file for all UK pension schemes. Due to the delay, if it was not received in February the Fund would not be able to undertake the project in March, April or May as this was set aside to undertake pensions increases work. If the file was received in March due to other activities to be undertaken, the project could not be undertaken until November. This was having a knock on effect as the Fund had taken out a specific software licence which would run out in November. As the Licence was taken out on an annual basis, the Fund would have the additional costs of renegotiating for a further extension period.
- **Member tracing and mortality screening** - For those members where automated tracing confirmed a current new address but with a low level of confidence, a more manual approach to tracing was currently being undertaken. A verification process was also in progress to ensure those members were at a new address that had been provided, with completion expected in March.
- **Chartered Institute of Public Finance and Accountancy (CIPFA) 2019 Benchmarking exercise** – the results from a comparison of 29 other Local Government Pension Schemes (LGPS) funds showed that the net administration cost per member of the Cambridgeshire Pension Fund was £14.09 per annum compared with the group average of £21.34 per annum. The Fund net administration cost per full time equivalent member of staff was £50.1k per annum compared with the group average of £71.8k per annum. Concern was however expressed that it was not that representative, as only 30 out of 87 potential LGPS funds from England and Wales had participated. It was confirmed that the same template was used by all those participating. The Board supported the Pension Committee's decision for the Fund to continue to participate in the annual benchmarking exercise but asked officers to undertake the following **Actions:**

- Lobby to make, the returns compulsory.**
- That the benchmarking report should be sent to ~~Committee~~ Board.**

Jo
Walton

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Employers Admissions and Cessations

noted that the following admission bodies had been admitted to the Cambridgeshire Pension Fund:

- ABM Catering Limited
- Caterlink
- Easy Clean
- Hertfordshire Catering Service (HCL)
- Nightingale Cleaing Limited
- Pabulum Limited

The following scheduled body had been admitted to the Cambridgeshire Pension Fund:

- Our Lady of Walsingham Catholic Multi Academy Trust (MAT).

The following bodies had ceased to be an employer within the Cambridgeshire Pension Fund:

- Aspens (The Weatherall's Primary School)
- Edwards and Blake (New Road Primary School)
- Pabulum (Downham Feoffes Primary)
- YMCA Trinity Group

Other issues raised in discussion included:

- Querying on Appendix 1 page 48 of the agenda the increase in County Council Overhead Recovery - the last line entry before the totals column showing a -£35,000 variance compared to the previous year. This was in relation to efficiency sharing in the unwinding of LGSS with an expectation that the overheads costs would show a significant reduction for the next year and no expectation that this column would show an increase.
- Regarding the large pension overpayment, there was a request for more details on how this had occurred. While the bank had a duty to return payments, this only applied if the account was closed, and often they would not be aware themselves of a death unless informed. It was explained that the Fund now had a mortality screening services in place so this type of case was less likely to recur going forward, although overseas residents could be a different issue.
- One member asked if there was any recourse to compensation from IT if it was defects in the system software used. This was not practicable in this case as there were a number of factors involved as set out in the report and it would be difficult to prove how much was due to the IT. There was also a duty on the representatives of the deceased to inform the Fund. It was also clarified that once an estate was closed, it was not economically viable to pursue a claim and was when a write off was sought.

it was resolved:

To note the report.

139. PENSION FUND ANNUAL BUSINESS PLAN UPDATE

This report presented the Pension Fund Business Plan update for the period ending 31st December. In the oral presentation the key issues highlighted / discussed included:

- **Page 59 Communications, Systems and Employer Management (CSEM) 4 Implement monthly data collection for all employers** - this had already been referenced in the earlier report discussion and would go into the next year.
- **Page 59 paragraph 2.3.2 CSEM4 Implement monthly data collection for all employers – with reference to the update text and the wording reading** Due to a number of staffing issues, the on-boarding of i-connect for some small employers had fallen behind schedule. Clarification was requested regarding whether it was internal staffing or small employer staffing. It was clarified that it was internal staffing. The activity would form part of the 2020-21 Business Plan.
- **Page 60 – Operations (OPS) 1 - Processing of Undecided Leavers –** This had been referenced in the previous report. The Multi Deferred Benefit (DB) cases processed by Aon had required considerably more activity than originally estimated, including a number of process changes to ensure appropriate validation checks. This had increased the length and cost of the variable cost project by £100k with Aon agreeing to absorb significant costs to reach this figure. The project had now been moved to a fixed cost to ensure no further increases with The Chairman of the Pension Fund Committee having been informed, enabling the project to proceed.
- **Page 61 – Investments and Fund Accountancy (IA) 6 - Implement online payment platform for employers' contribution payments –** This had been amber with the original expectation that it would go over to 2020-21, but was now due to be rolled out shortly.
- **Page 61 - IA8 – Tender for an Independent Advisor –** resources were being put in to move this along.

It was resolved:

To note the report.

140. RISK MONITORING

Officers had reviewed the Risk Register and considered that there had been no change in impact or likelihood scores since the last review. Paragraph 2.2 of the report set out the detail of changes that had been made to the Register since the previous update

On short term risks:

- Following the McCloud ruling details were given on the likely remedy for members in scope who were not currently offered protection, but no steer had yet been received on the practicalities of the ruling and therefore the full impact to the Cambridgeshire Pension Fund was still unknown.
- The political risk and uncertainty surrounding Brexit could have an

- impact on asset volatility in the short term but was again not yet known until more detail was known on the final deal.

It was highlighted that during Christmas and January there had been a considerable number of enquiries regarding transferring pensions, with some members having made decisions to transfer their pension despite the Fund providing information on potential scams and to seek independent advice before transferring their pension to a third party. Where there had been mis-selling, it now appeared that claims companies were becoming involved, especially since the end of PPI, and this appeared to be a growing market going forward with some claims companies taking 18% of recovered monies as their fee. There had already been a case where the Ombudsman was ruling against a Pension Fund saying that the advice they had been given by an IFA had been unsound / not comprehensive enough, and ruling that the Pension Fund should compensate the pension monies lost. The ruling had indicated that the Fund should have gone back to the member and sought assurance that they knew what they were doing in terms of risk. Cambridgeshire Pension Fund had employed professional advisers to make sure the advice that was sent out to members was as comprehensive as it could be.

Having reviewed the current risks facing the Fund,

It was resolved:

To note the report.

141. GOVERNANCE AND COMPLIANCE REPORT

This report provided information on:

- The LGPS Scheme Advisory Board including:
 - Good Governance Review
 - LGPS Code of Transparency – compliance Reporting system
 - Draft Guidance on Responsible Investment Guidance
- The Pensions Regulator including:
 - LGPS Engagement Report
 - Initiative to improve data quality
- The Ministry of Housing, Communities and Local Government concerning the governance of the Local Government Pension Scheme (LGPS) on a national and local basis detailing SF3 Data (LGPS Funds: England and Wales 2018-19)
- The Queen's Speech regarding a new Pension Schemes Bill which strengthen the Pensions Regulator's powers, provide a framework to support pension dashboards and introduce regulations covering the right to a pension transfer.
- Skills and knowledge opportunities – training events with Appendix 1 of the report listing the main events deemed useful and appropriate.

Key issues highlighted included:

- The LGPS Scheme Advisory Board – Good Governance Review was

now at phase two with two working groups having been formed to take forward the proposals in the report. The full report was set out in Appendix 2 to the cover report with a summary of the 17 recommendations. The table in paragraph 2.1.5 of the report set out the most notable new recommendations. For the Cambridgeshire Fund some of the recommendations were already in place or partially so. On the new recommendations attention was drawn to the following:

- General (A2) and the recommendation reading “Each administering authority must have a single named officer who is responsible for the delivery of all LGPS related activity for that fund (“the LGPS senior officer”)” There was currently debate, nationally whether this was the Section 151 Officer or the Head of Pensions.
- Compliance and Improvement (F1) reading “each administering authority must undergo a biennial Independent Governance Review (IGR) and, if applicable, produce the required improvement plan to address any issues identified. IGR reports to be assessed by a Scheme Board panel of experts”. Clarification was required on whether this could be undertaken by the Pool’s existing governance advisors. Information currently coming in was that it would be a fixed price contract. The Scheme Advisory Board was meeting on 3rd February so clarification information might be available at for the 7th March event at Wyboston.
- Paragraph 2.3 Draft Guidance on Responsible Investment Guidance issued by the Scheme Advisory Board (SAB) (included as Appendix 3) which was open for consultation until 11th January 2020. The aim of the first part of the guidance was to assist and help investment decision makers to identify the parameters of operation within scheme regulations, statutory guidance, fiduciary duty and the general public law and the scope for integrating ESG (environmental, social and governance) policies as part of investment strategy statements. Officers after consultation with all access Chairmen had written to the SAB advising of concerns regarding the draft guidance in its present form.
- SAB had made it clear that there was no intention to prescribe the extent to which ESG policies should be adopted as this would remain a matter for local consideration and agreement. Part two was currently being drafted to go the SAB meeting on 3rd February.

Issues raised included:

- The Vice Chairman queried the text in paragraph 2.1.6 reading “The Scheme Advisory Board have invited comments on the report and its recommendations prior to the next meeting of the Scheme Advisory Board on 3rd February 2020. Officers are in the process of drafting a response in conjunction with the Chairman and Vice-Chairman of the Pension Fund Committee and Local Pension Board which will be submitted to the Scheme Advisory Board no later than 20th January 2020” asking when it had been sent. In reply it had been sent to

all the Board on 13th January with officers having received back comments from Councillor Payne.

- Councillor Payne highlighted that page 88 the last line of 4.1.1 reading “£134.3m in 2018-19 and £126.4m in 2017-18 an increase of £7.9m (6.3%)” the word increase should have read decrease.
- **Conference events** - Councillor Payne highlighted that he was still receiving invites for events with no officer guidance on whether they were useful to attend. The Chairman indicated that he usually dropped an e-mail to the officers to ask their advice. . In response officers indicated that they were currently looking at the core competencies and changing the events structure to link conferences to them. CIPFA were also due to provide an updated skills and knowledge guidance. **Officers would come back with details in due course and were hoping it would be by the 6th March event. Action**
- David Brooks indicated that he would not be attending anymore events as he would be leaving the Board in 2021 and did not want to waste the Fund’s money.
- **Barry Sullivan requested that on the schedule an extra column was included stating the location for training events to help decide that if it was too far members could make a more informed decision whether to decline. Action:** Officers saw no reason why this could not be accommodated, while adding that they would not put on an event that was too far to travel to.

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It was resolved:

To note the report.

142. CAMBRIDGESHIRE PENSION FUND 2020-2021 COMMUNICATIONS STRATEGY

The Communications Strategy has been reviewed and updated and the board is asked to review and provide comments. The main changes were summarised in paragraph 2.3 with the draft document included as appendix 1 to the report.

Issues raised included:

- That while there were lots of comments regarding how the Fund communicated to scheme members there was not much information on communications from Scheme Members to the Fund. In reply this was as the requirement was to have a Communications Strategy for the Fund. The suggestion was that still more information should be given on how the members could communicate with the Fund.
- Linked to the above comment with regard to page 139 and the last line in bold text reading “A member can opt out of electronic communications, at any time, by informing us in writing that they wish to do so” there was a query on how easy tis was to do. It was clarified it could be via an email not just by a postal letter.

- As raised earlier in the meeting officers should look into providing a video on how to access the portal.
- Query on bottom of page 143 where it refers to Pension Fund Boards and Investment Sub Committees whether it should refer to Pension Fund Committee.

Having reviewed the Strategy, It was resolved:

To ask the officers to further review the document in light of the suggestions made.

**Cory
Bloese**

143. VALUATION OF THE PENSION FUND

This report provided an update on the key work being undertaken with regard to the Pension Fund Valuation.

Key issues highlighted in the presentation of the report included:

- Draft valuation results for employers were provided by the Actuary and distributed to employers at the beginning of December with a deadline of 31 January set for agreeing final contribution rates with employers. An Employer's Forum was held on Wednesday 4th December focussing on the valuation with the Fund Actuary providing an overview of the valuation process, draft changes to the Funding Strategy Statement and how employer contributions had been calculated. Feedback had been positive with frank conversations with some employers about long term participation in the Local Government Pension Scheme (LGPS). The Actuaries also commented on the success of the event particularly the level of attendance from employers believing it to be among the very best forums they have attended.
- The draft Funding Strategy Statement was issued to employers alongside their valuation results with consultation closing on 17th January. Discussions were held with the Actuary following the initial calculation of employer results to agree the parameters to be used for each employer when setting contribution rates, including the funding target, the time horizon for reaching that target and the required probability of success within that time frame. There were some key changes, notably older admission bodies with no guarantor being moved onto a "gilts glide path so their results were produced on the same basis that would be used when they exited the Fund and their contribution rates set to achieve full funding. As discussed earlier in the meeting this was a more prudent and transparent approach with the aim to facilitate realistic discussion with the employers about long term affordability of remaining in the Fund. A more prudent approach had also been adopted for Further and Higher Education organisations (of which there were only five) by reducing the length of time permitted for reaching their funding target from 20 years to 15 years, reflecting the increased risk these organisations posed to the Fund as a result of the Government no longer providing a guarantee for these employers. None had come back to say the rates proposed were unaffordable.
- For contractors, the required probability of success had been reduced

- from 70% to 55% reflecting their normally short term participation in the Fund and to avoid the need to pay exit credits to contractors when they ceased participation. The liabilities of these employers were usually secured by a bond and were ultimately guaranteed by the authority that has contracted them.

It was resolved:

To note the Valuation Update.

144. EXCLUSION OF THE PRESS AND PUBLIC

It was resolved to:

Exclude the press and public from the meeting for the following items of business on the grounds that they contained exempt information under Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended, and that it would not be in the public interest for this information to be disclosed (information relating to the financial or business affairs of any particular person (including the authority holding that information)).

145. ACCESS ASSET POOLING UPDATE

The Board received an update on asset pooling including a summary of the agenda item discussions from the agenda for 9th December.

Key issues highlighted:

- Councillor Kemp-Gee from Hampshire had now taken over the Chairmanship from Suffolk with the Vice Chairman now Councillor Barker from Essex.
- The Governance update reported significant progress on the review of the Inter Authority Agreement.
- Part 1 items included an update on the Business Plan and Budget since the 9th September 2019 Access Joint Committee (AJC) meeting highlighting that the revised budget forecast for ACCESS costs for 2019-20 were slightly under budget with details also provided on the proposed 2020/21 Business Plan. The costs would be included in the Funds Business Plan for approval at the March / April 2020 Pensions Committee cycle.

Part II items.

- The Committee had noted the risk register and the ongoing internal review of the register and approved the recommended revisions.
- The Authorised Contractual Scheme (ACS) implementation update fed back on the progress in regard to launching the liquid active sub funds and the options for the pooling illiquid asset classes.
- An update was provided on the Operator contract, reporting an improvement in the scoring by partner funds of services received from LINK. The update also included details of current issues upon which the Access Support Unit (ASU) and colleagues on the Officer Working Group were engaging with LINK. More information on the LINK scoring was given orally.

- In terms of the Liquid asset build, this was nearly completed, with intensive work now commencing on illiquid assets.

It was resolved to:

- a) Note the asset pooling update;
- b) Note the minutes from the ACCESS Joint Committee meeting held on 9th September 2019.

146. AGENDA PLAN

The Agenda Plan was noted.

In terms of IT issues there was to be a review of the Business Continuity Plan for either the April or July meeting. Action

**Michelle
Oakensen**

**Chairman
April 2020**