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## GREATER MANCHESTER PENSION FUND - LOCAL PENSIONS BOARD

**Day:** Thursday  
**Date:** 11 April 2024  
**Time:** 3.00 pm  
**Place:** Guardsman Tony Downes House, Manchester Road,  
Droylsden, M43 6SF

Item No.	AGENDA	Page No						
1.	<b>APOLOGIES FOR ABSENCE</b> To receive any apologies for absence.							
2.	<b>DECLARATIONS OF INTEREST</b> To receive any declarations of interest.							
3.	<b>MINUTES</b> To receive the minutes of the Local Pensions Board meeting on the 25 January 2024.	1 - 8						
4.	<b>LOCAL GOVERNMENT (ACCESS TO INFORMATION ACT) 1985 - EXEMPT ITEMS</b> The Proper Officer is of the opinion that during the consideration of the items set out below, the meeting is not likely to be open to the press and public and therefore the reports are excluded in accordance with the provisions of the Schedule 12A to the Local Government Act 1972. <table border="1"><thead><tr><th>Item</th><th>Paragraphs</th><th>Justification</th></tr></thead><tbody><tr><td>5,6,7,8,9,10,11 12,13</td><td>3&amp;10, 3&amp;10, 3&amp;10, 3&amp;10, 3&amp;10, 3&amp;10, 3&amp;10, 3&amp;10, 3&amp;10</td><td>Disclosure would, or would be likely to be in the commercial interests of the Fund agents which could in turn affect the the beneficiaries and/or tax payers.</td></tr></tbody></table>	Item	Paragraphs	Justification	5,6,7,8,9,10,11 12,13	3&10, 3&10, 3&10, 3&10, 3&10, 3&10, 3&10, 3&10, 3&10	Disclosure would, or would be likely to be in the commercial interests of the Fund agents which could in turn affect the the beneficiaries and/or tax payers.	
Item	Paragraphs	Justification						
5,6,7,8,9,10,11 12,13	3&10, 3&10, 3&10, 3&10, 3&10, 3&10, 3&10, 3&10, 3&10	Disclosure would, or would be likely to be in the commercial interests of the Fund agents which could in turn affect the the beneficiaries and/or tax payers.						
5.	<b>ADMINISTRATION UPDATE</b> To consider a report of the Director of Pensions / Assistant Director for Administration.	9 - 34						
6.	<b>THE PENSIONS REGULATOR (TPR)</b> To consider a report of the Director of Pensions / Assistant Director for Administration.	35 - 84						
7.	<b>THE PENSIONS REGULATOR'S GENERAL CODE OF PRACTICE</b>	85 - 94						

From: Democratic Services Unit – any further information may be obtained from the reporting officer or from Natasha Matthews, Senior Democratic Services Officer, to whom any apologies for absence should be notified.

Item No.	AGENDA	Page No
	To consider a report of the Director of Pensions / Assistant Director for Administration.	
8.	<b>SUMMARY OF GMPF DECISION MAKING</b>	95 - 100
	To consider a report of the Director of Pensions.	
9.	<b>BUSINESS PLANNING AND RISK MANAGEMENT</b>	101 - 118
	To consider a report of the Director of Pensions.	
10.	<b>MANAGEMENT INFORMATION AND STATISTICS - PROJECT UPDATE</b>	119 - 122
	To consider the attached report of the Director of Pensions / Assistant Director for Pensions Administration.	
11.	<b>LOCAL BOARD GOVERNANCE REPORT FOR EMPLOYERS</b>	123 - 142
	To consider a report of the Director of Pensions / Assistant Director for Administration.	
12.	<b>ARTIFICIAL INTELLIGENCE (AI)</b>	143 - 150
	To consider a report of the Director of Pensions / Assistant Director for Pensions Administration.	
13.	<b>INTERNAL AUDIT PROGRESS REPORT</b>	151 - 162
	To consider the attached report of the Head of Assurance.	
14.	<b>INTERNAL AUDIT PLAN 2024/25</b>	163 - 192
	To consider the attached report of the Head of Assurance.	
15.	<b>URGENT ITEMS</b>	
	To consider any additional items the Chair is of the opinion shall be dealt with as a matter of urgency.	
16.	<b>DATE OF NEXT MEETING</b>	
	To note the date of the next meeting of the Local Pensions Board on 1 August 2024.	

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From: Democratic Services Unit – any further information may be obtained from the reporting officer or from Natasha Matthews, Senior Democratic Services Officer, to whom any apologies for absence should be notified.

# Agenda Item 3

## GREATER MANCHESTER PENSION FUND - LOCAL PENSIONS BOARD

25 January 2024

Commenced: 15:00

Terminated: 16:35

<b>Present:</b>	<b>Councillor Fairfoull</b>	<b>(Chair) Employer Representative</b>
	<b>Jack Naylor</b>	<b>Employer Representative</b>
	<b>Catherine Lloyd</b>	<b>Employee Representative</b>
	<b>Paul Taylor</b>	<b>Employer Representative</b>
	<b>David Hope</b>	<b>Employee Representative</b>
	<b>Michael Cullen</b>	<b>Employer Representative</b>
	<b>Alan Kniveton</b>	<b>Employee Representative</b>

**Apologies for Absence**      **Chris Goodwin, Mark Rayner and Paul Entwistle**

### 26      **DECLARATIONS OF INTEREST**

There were no declarations of interest.

### 27      **MINUTES**

The minutes of the Local Pensions Board meeting on the 28 September 2023 were approved as a correct record.

### 28      **GMPF FINAL ACCOUNTS – ACCOUNTING POLICES**

Consideration was given to a report of the Director of Pensions / Assistant Director for Local Investments and Property. The report detailed the progress of the governance arrangements for the budget setting and financial reporting. This was provided by the attached appendix to the report that was presented to the GMPF Management Panel on 1 December 2023.

In terms of the GMPF Draft Accounts, Members were advised that a draft simplified statement of accounts had been reported previously to Board. Whilst the audit was not yet completed the majority of fieldwork was complete and no changes were anticipated to the headline number, as detailed in the report.

With regard to the progress of external audit, the report displayed the progress to date with the Audits for 2021 and 2022. The highlights were that 2021 accounts were now fully signed off and the 2022 Audits Finding Report had been signed off by Tameside Audit Panel, (copy appended to the report).

The annual report was still being finalised due to late completion of audit and awaited sign off from Tameside Audit Panel.

#### **RESOLVED**

**That the report be noted.**

### 29      **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 – EXEMPT ITEMS**

#### **RESOLVED**

**That under Section 100 (A) of the Local Government Act 1972 the public be excluded for the following items of business on the grounds that:**

- (i) they involve the likely disclosure of exempt information as defined in the paragraphs of Part 1 of Schedule 12A of the act specified below; and**

- (ii) in all circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information for reasons specified below:

Items	Paragraphs	Justification
6, 7, 9, 10, 11, 12, 13	3&10, 3&10, 3&10, 3&10, 3&10, 3&10, 3&10	Disclosure would or would be likely to prejudice the commercial interests of the Fund and/or its agents, which could in turn affect the interests of the beneficiaries and/or tax payers.

### 30 ADMINISTRATION UPDATE

Consideration was given to a report of the Director of Pensions / Assistant Director for Pensions Administration. The report provided Local Board with an update on key activities that had taken place in the Administration section during the last quarter, including comments on administration performance and on complaints and disputes. Members were also provided with confirmation of the areas of focus for the next quarter.

It was explained that during the last quarter, the team had been focussed on the McCloud project. The amendments to the regulations came into effect from 1 October 2023 and although guidance on some areas was still awaited, the project had taken up significant resource as data collection work progressed and as software was received and tested. As the implementation of the McCloud remedy was a statutory requirement, the work had taken priority over several projects.

The performance dashboard for quarter 2 (July to September 2023) could be found at Appendix 1. Overall, levels of casework and performance against turnaround targets remained relatively consistent. Performance levels remained high and work on projects that supported improving the service provided to members continued. Members were advised that a main area that experienced change to expected workloads during this quarter was pension transfers due to transfer calculations that were on hold while new factors were produced by GAD. It was also explained that annual benefits statements, pension saving statements and overseas pensioner member existence checks were produced and issued during this quarter.

Members of the Local Board were advised that My Pension registration figures continued to increase, with over 182,000 members registered to access their online account. It was reported that visits to the My Pension pages on Annual Benefit Statements and the calculator increased during this quarter due to correspondence issued which alerted members that their statement was available on their My Pension account. It was reported that member events continued to be popular and very well received. Eight member events were held in quarter 2 with 79 members in attendance. The most popular events covered McCloud, employer focus groups, plus ones on pensionable pay and retirements.

With regard to Members Services, it was reported that work to produce and issue pension saving statements for contributors, members with benefits on hold and pensioner members who had retired in the 2022/23 tax year was completed and all statements were issued by the statutory deadline of 6 October 2023. Those who had requested a paper copy or a version in an alternative format had also received their statement by this date. Members were further advised that the annual review of GMPF's death grant payments guidelines, together with a review of death grant case decisions made in 2022/23 was undertaken during the last quarter.

It was reported that a main area of focus for the Employer Services section over the last quarter was to support all employers to submit their monthly data return correctly and on time. It was explained that the Employer Data and Pension Fund Accountancy teams had undertaken an exercise that identified employers that regularly submitted their iConnect returns late and a notice of non-

compliance was issued to these employers. Members were advised that as a result of the non-compliance exercise, the iConnect submission rates had significantly improved. Members of the Board were advised that this exercise had highlighted some areas of learning and an action plan had been created which ensured that this learning was applied to all systems and processes.

Members of the Board were provided with the customer services and communications dashboard was attached at appendix 2 which provided long term statistics about general engagement from April 2022 to September 2023 and other statistics for quarter 2 (July to September 2023).

Members were pleased to hear that call waiting times and abandoned calls had reduced considerably since the last report. It was explained that in order to reduce unnecessary contact, several amendments and improvements had been made to the GMPF website. The My Pension area of the website had been reviewed and ensured that members were able to find key information easier. Member newsletters were issued in December 2023 to all members who were likely to be under the scope of the McCloud remedy to meet disclosure regulation timeframes.

With regards to Development & Technologies, it was reported that GMPF continued to monitor all attempted cyber-attacks. Statistics for quarter 2 (July to September 2023) and other cyber related updates were appended to the report at appendix 3. It was explained that the IT Infrastructure team planned and carried out an email phishing stimulation exercise across all GMPF account holders.

The Assistant Director for Pensions Administration summarised the key areas of focus for the next few months which included McCloud and PASA accreditation.

## **RESOLVED**

**That the report be noted.**

### **31 THE PENSIONS REGULATOR (TPR)**

Consideration was given to a report of the Director of Pensions / Assistant Director for Pensions Administration. The report provided the Local Board with a summary of the current breaches log and decisions made by the scheme Manager regarding the reporting of these breaches. The report also included an update on the TPR proposed Single Code of Practice now called the General Code.

A copy of the current breaches log (excluding late payments and contributions) was attached as Appendix 1. The criteria that officers used to assist them in assessing whether a breach might be deemed 'material' was also attached at appendix 2. It was explained that GMPF officers continued to meet monthly and considered the materiality of any breaches that had occurred and discussed the appropriate actions to be taken to minimise the potential for breaches to occur in the future.

It was explained that one of the key requirements of Code of Practice number 14 is that Scheme Managers operated appropriate systems to ensure that contributions are paid to the Scheme in accordance with requirements in the Scheme Regulations. Officers continued to meet monthly to discuss issues that related to the monitoring of late contributions and examined options for improving current processes. Following the implementation of monthly data collection from employers, compliance with data submission deadlines was also monitored.

Members were advised that there were a small subset of employers who struggled to meet their obligations to either submit their data every month or make timely payment of their pension contributions. Since September 2023, officers had worked on improving compliance amongst the persistently non-compliant and poor performing employers. The formal 'Notice of Non-Compliance' was sent in October 2023. Since this, employer compliance had shown signs of improvement. However, officers recognised that work was intended to be a long term effort and therefore further monitoring was needed before the work was deemed as successful.

Members were informed that colleagues from TPR had contacted GMPF in September 2023 and confirmed that their supervisory engagement would be recommenced. Officers had liaised with the TPR and provided copies of all the documents requested. Supervisory evaluation meetings had been arranged and the first meeting had taken place on 18 December 2023 which covered three topics:

- Pension Board operation / conflicts of interest
- Pension Board effectiveness reviews
- Equality, Diversity, and Inclusion (Pension Board composition)

It was reported that the General Code was laid in Parliament on 10 January 2024 and the code was expected to be in force by the end of March 2024. As reported at previous meetings, GMPF had undertaken a GAP analysis and further analysis had been undertaken as the Code requirements became clearer as the General Code had been laid in Parliament. It was explained that further analysis was expected to be presented at the next Board meeting.

Detailed discussion ensued with regards to the report and cyber security assurances. Members were advised that GMPF was to undertake a joint audit with Tameside MBC to establish cyber essentials credentials. It was explained that the TPR issued updated cyber security guidance for all pension schemes on 11 December 2023. This guidance set out the practical steps that pension schemes were able to take to meet the expectations that were set out in the new General Code. It was further reported that the TPR had asked Scheme Managers to report significant cyber incidents to them in order to set out the risks faced by pension schemes.

## **RESOLVED**

### **That the Local Pensions Board**

- (a) Review the current breaches log and consider the decisions made by the Scheme Manager regarding reporting those breaches**
- (b) Note the other relevant developments set out in the report.**

## **32 SUMMARY OF GMPF DECISION MAKING**

Consideration was given to a report of the Director of Pensions. The report summarised the recommendations made by the GMPF Working Groups over the period from September 2023 to December 2023, which were approved at the Management Panel on 1 December 2023. It also summarised the decisions made by the Management Panel at the same meeting.

The Director of Pensions summarised the recommendations made by the Administration, Employer Funding and Viability Working Group and Investment Monitoring and ESG Working Group on the 22 September 2023 and the recommendations made by the Policy and Development Working Group on the 23 November 2023.

At its 1 December 2023 meeting, the GMPF Management Panel approved the recommendations from the various Working Group meetings. The Panel received a report explaining that when an employer leaves the LGPS and a surplus of assets exists, the Administering Authority had sole discretion about whether to pay an exit credit to the exiting employer. The report provided details about the relevant regulations and policies to be followed when making decisions on these matters and suggested that the Director of Pensions be given delegated authority to make decisions where certain circumstances applied. It was recommended that the Management Panel:

**Delegate responsibility to the Director of Pensions to make determinations about the payment of exit credits, where those decisions are in line with agreed criteria and are made after having sought advice from GMPF's actuarial and where appropriate legal advisors.**

Members were advised that the Panel also considered the following reports for noting:

- Business Planning and Risk Management
- Quarterly Update on Responsible Investment Activity
- Update on GMPF's Approach to Climate Risk

- GMPF Statement of Accounts and Annual Report 2022-2023
- Performance Dashboard
- Update on Investment Management Cost and Administration Benchmarking
- Pensions Administration Update
- LGPS Update

## **RESOLVED**

**That the report be noted.**

### **33 BUSINESS PLANNING AND RISK MANAGEMENT**

Consideration was given to a report of the Director of Pensions. The report provided details of the current business plan and highlighted the current key risks that were being monitored.

The report set out the progress that had been made on the seven key strategic projects that were set out in the 2023/24 business plan. The seven key strategic projects were explained and summarised to Members of the Board.

The risk register was reviewed and updated at least once each quarter and the latest version was included within the report for review at Appendix 2. The key issues that were being monitored were listed on the 'Current Issues' tab. Members were advised with regards to specific issues that had been monitored closely by officers during the quarter which included:

- Issue 2 – Investment pooling uncertainty;
- Issue 4 – Employer flexibilities / exits;
- Issue 8 – McCloud;
- Issues 15 and 19 – Increase in levels of cyber fraud / cyber-attacks;
- Issue 23 – Website software – transition to a new platform;
- Issue 25 – AI and ChatGPT usage;

With regards to McCloud, it was explained that the impact of the McCloud project continued to be closely monitored. Issues included the lack of guidance and software problems continued to present a challenge, albeit the data collection work had progressed well. With regards to issues 15 and 19, it was reported that the risks related to cyber security were greater than ever and work continued which ensured existing controls still worked and new controls were put into place wherever possible.

Detailed discussion ensued with regards to the report and Members of the Board recognised the robust process included in risk management and business planning. Members highlighted that a summary of the risks that had moved on since the report be provided would be beneficial.

## **RESOLVED**

**That the report be noted.**

### **34 GMPF ILL HEALTH INSURANCE ARRANGEMENT REVIEW**

Consideration was given to a report of the Director of Pensions/Assistant Director for Pension Administration. The report explained that the GMPF's ill health insurance arrangement had been in operation for nearly four years and provided Members with analysis of the main experiences and findings to date.

It was explained that GMPF's insurance scheme began operation on 1 April 2020 at the start of the 2020-23 triennial valuation period and so the scheme had been running for close to four years. Members of the Board were advised that the key objectives of the ill health insurance arrangement were:

- To protect GMPF employers from unaffordable ill health strain costs.
- To simplify the payment and administration of ill health early retirements ensuring that

- members who are granted ill health early retirement can retire promptly.
- To operate within the actuarial assumptions set by the Actuary over the long term, recognising that there could be individual years where ill health costs could exceed the assumed cost for that year.

It was explained that as of 31 December 2023, there were approximately 530 employers who participated in GMPF's ill health insurance. Members were provided with information which outlined the number of ill health early retirements experienced during the lifetime of insurance arrangement, alongside the average cost and most expensive strain cost experienced in the year. It was explained that all years experienced several ill health early retirements amongst the insured population. Furthermore, there were large ill health strain costs that occurred in all years and it was explained that 2022/23 saw a single strain cost equivalent to approximately 15% of the entire national insurance cover for the year.

In summary, it was explained that the ill health insurance scheme had been a positive development for employers and had met the stated aim to protect employers from unaffordable ill health early retirement costs. Members were advised that many smaller employers had benefitted from the scheme and Members were pleased to hear that GMPF had noticed a positive impact on its administrative teams, with less time required to chase payments on ill health early retirement costs.

## **RESOLVED**

**That the report be noted.**

## **35 UPDATE ON INVESTMENT MANAGEMENT COST AND ADMINISTRATION BENCHMARKING**

Consideration was given to a report of the Director of Pensions / Assistant Director (Investments) / Assistant Director (Administration). The report provided the Local Board with an update on investment management cost benchmarking for the Fund over 2022/23.

It was reported that GMPF had taken part in administration benchmarking with CEM for the fifth year running. GMPF's peer group comprised of 15 pension schemes whose membership ranged between 94 thousand and 660 thousand members. The peer median was 306 thousand, compared to GMPF's membership of 417 thousand. Eleven LGPS pension funds supplied data and were part of the peer group. This was a slight increase to previous years and it was reported that this was due to three more LGPS funds who submitted data with CEM for the first time. The CEM benchmarking report compared both costs and member service, with 'cost per member' and 'service score' being the two indicators of comparison.

Members of the Board were advised that CEM's analysis showed that GMPF remained a low cost, high service administrator compared to its peers. GMPF's total cost per member was £17.91, which was £6.71 lower than the adjusted peer average of £24.62. GMPF's service score was 69 out of 100, which was 8 points above the peer median of 61. The total cost per members was slightly higher than last year (by £1.00) but the cost position relative to peers had fallen. The service score remained unchanged when compared to the year before.

As reported previously, there were two areas of focus in view of the outcomes of the 2021/22. Members were advised that the first area was around measuring casework tasks. It was explained that the GMPF had purchased and implemented a new reporting tool in August 2023 which aimed to progress this work. Although this was still in early stages, this reporting tool would assist GMPF in order to produce data that was more comparable to that used by peers and Members were advised that this area of work therefore would benefit service standards and would be reflected in future years' scores.

The second area of focus considered the value and benefit of providing a stewardship report to GMPF employers to provide feedback on how well GMPF's members were being served. It was



explained that officers had worked with the GMPF Local Pension Board to establish a Governance report which would be issued annually by the Local Pensions Board to GMPF employers.

Wide ranging discussion ensued in relation to the report and Members recognised that GMPF had improved and remained a low cost, high service administrator. Members highlighted the importance of service improvement and maintaining costs going forward.

## **RESOLVED**

**That the report be noted.**

### **36 LOCAL BOARD GOVERNANCE REPORT FOR EMPLOYERS**

Consideration was given to a report of the Director of Pensions / Assistant Director for Pensions Administration. The report provided the Local Board with information about a proposed new Governance report for Employers.

Members of the Board were advised that the purpose of the Governance report for Employers was to provide GMPF's employers with the necessary assurance that GMPF's governance arrangements were robust and effective with proper oversight and accountability in place. It would further demonstrate how well GMPF serves its members by including key information about performance, system improvements and available support.

The Strategic Lead for Employer Services presented the draft report template to Members of the Board which was also attached at appendix 1. It was explained that the content included was not necessarily real text or accurate data, with some text added at this stage for illustration and discussion only. Final and accurate text and data was to be added for the 2023/24 financial period once the proposed context was approved.

It was explained that the draft report included the following;

- An introduction from the Chair of the Local Pensions Board;
- GMPF's values, vision and quality standards;
- Business Planning and Service Improvements;
- Monitoring of GMPF's Performance – both that of GMPF and its employers;
- Feedback and survey results;
- Audit and Assurance;
- Independent Dispute Resolution Procedure (IDRP) and learning;
- Support available for members and employers;
- Report Summary and GMPF's Strengths, Challenges and Future Plans.

It was explained that initial feedback was sought via a survey issued to all employers in December 2023. Members were pleased to hear that the responses received were positive and employers confirmed that the report was useful to understand how GMPF served their members. It was proposed that the report be created for the 2023/24 financial year and Members were provided with a timeline for implementation. Once the contents and proposed report format were agreed, it would be shared with GMPF's Employer Engagement Panel, where feedback will be reported to the Local Board at a future meeting.

Detailed discussion ensued in relation to the report and Members were widely supportive of the draft report and understood the benefits that the report provided. Although Members believed that the report was headed in the right direction, Members highlighted various key points should be included in the report, such as the scale of the Pension Fund membership. Members felt that it was important to include a glossary page which explained key terms such as McCloud. Members were pleased with the design of the report and highlighted that further work could be done to reduce the amount of words on each page. Members also believed that the report should coincide with the delivery of the Year in Review.

**RESOLVED**

**It is recommended that the Local Board considers the proposed report and whether it has any feedback on the report design and content.**

**37 INTERNAL AUDIT PROGRESS REPORT – JANUARY 2024**

Consideration was given to a report of the Head of Assurance which provided an update on Internal Audit's work against the Greater Manchester Pension Fund (GMPF) Audit Plan as of January 2024.

At the last meeting of the Local Board, Members of the Board were advised that progress had been slower than anticipated. Members were informed that work was ongoing to recruit an Interim Audit Manager whilst a Service Review was completed on the Assurance function which ensured that the function was appropriately resourced going forward. It was reported that a new co-sourced partner was procured during the period and work was ongoing to flex this resource to deliver the annual audit plan.

A summary of progress against the plan during this period was appended to the report at appendix 1. There were no specific issues that were highlighted through the work undertaken by Internal Audit during the period. Members were advised that internal audit had two counter fraud specialists who facilitated the co-ordination of the GMPF's counter fraud activities. A summary of the work undertaken on unplanned/irregularity/fraud referrals undertaken during this period was detailed at appendix 2.

**RESOLVED**

**That the report is noted.**

**38 URGENT ITEMS**

There were no urgent items.

**CHAIR**

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