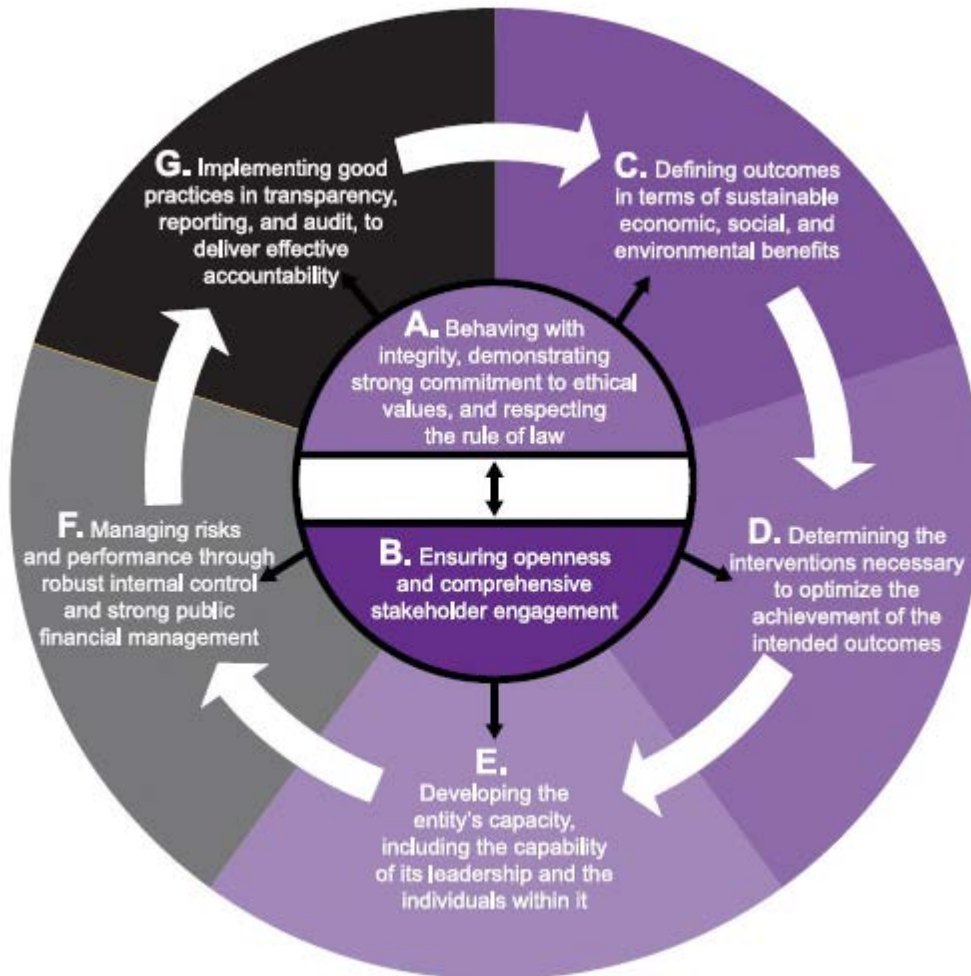


# Norfolk County Council Code of Corporate Governance

## Introduction

This Code of Corporate Governance sets out the Council's governance standards. These standards ensure the Council is doing the right things, in the right way in a timely, inclusive, open, effective, honest and accountable manner. The Code is based upon the following principles:



These principles represent best practice and are taken from the 'International Framework: Good Governance in the Public Sector' produced by CIPFA/IFAC<sup>1</sup>. The Framework is based on the principles in the inner circle permeating and being evident throughout the application of the principles in the outer circle. Good governance is dynamic and involves continuous evaluation and review.

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<sup>1</sup> CIPFA is the Chartered Institute of Public Finance and Accountancy. IFAC is the International Federation of Accountants (2016 edition).

The International Framework describes governance as follows:

“Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.”

The Council is committed to ensuring its approach to good governance can easily be understood by all. The following is a summary of the Council’s commitment to good governance.

**We will:**

- clearly set out our objectives and what we are trying to achieve.
- measure how effective our services are and take action to improve them. We will publish information showing how we are progressing towards our objectives.
- work with other public services, such as the Police and NHS, to improve services for Norfolk residents.
- ensure we make the best use of taxpayers’ money by taking prudent financial decisions and measuring the level of value for money we achieve.
- set out in our Constitution who can take which decisions.
- behave in ways that reflect our values and high standards of conduct.
- ensure people in the Council making decisions have access to accurate information to help them take decisions in the best interests of Norfolk people.
- record and publish the decisions we take and the reasons for them. Wherever possible, we will take the most important decisions in public.
- carry out scrutiny of our services to make sure they meet our residents’ needs.
- be sensitive about how we collect and record information about citizens of Norfolk and safeguard this information from misuse.

# The Council's Corporate Governance Principles

The principles, from the diagram above, are described in more detail below.

## **A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.**

### **Behaving with Integrity**

The Council fosters a culture of behaviour based on shared values, ethical principles and good conduct that is put into practice by Members and officers alike. The Council's values reflect and promote the Seven Principles of Public Life, known as the Nolan Principles. Work is underway to refresh and promote the Council's Values and Leadership attributes.

The leadership of the Council embodies these values and creates a climate of openness, support and respect that covers the whole organisation. It establishes, monitors and maintains the organisation's ethical standards and performance through the governance of the Council's Constitution.

The Council is committed to maintaining its values and integrity and operates a [whistle-blowing policy](#) to ensure that individuals who draw attention to factors that compromise the Council's integrity are adequately protected and supported in doing so.

### **Demonstrating Strong Commitment to Ethical Values**

The Council has elected to operate a voluntary [Standards Committee](#), composed of elected Members, including the Chairman of the Council on an ex-officio basis, with responsibility for promoting and maintaining high standards of conduct by Members, assisting Members to observe the Member Code of Conduct and monitoring the Member/Officer Protocol. The Council has also appointed two Independent Persons who assist the Council and its Monitoring Officer with maintaining high ethical standards.

The leadership of the Council puts in place robust policies and procedures which put its values into practice, these include:

- A [Member Code of Conduct](#) and arrangements for determining allegations that a Member has acted in breach of the Council's Member Code of Conduct, as required by the Localism Act 2011.
- A Staff [Conduct and Behaviour Policy](#) which makes it clear what standards are expected from staff across the organisation in the performance of their duties.
- A [Member / Officer Relations Protocols](#) providing guidance on how the working relationships between Members and officers should be conducted.

- A [Members' Allowance Scheme](#) for members which clarifies how Council resources should be used and how to avoid the inappropriate use of resources.
- A [Register of Members' Interests](#), in which Members' disclosable pecuniary interests, personal interests and prejudicial interests (as defined in the Member Code of Conduct) are registered. This includes gifts and hospitality received by elected Members.
- [Registers of Gifts and Hospitality](#) making it clear what gifts and hospitality have been received by members and by staff.
- A record of interests declared by officers in relation to Council contracts.
- Systems for reporting and dealing with any incidents of wrongdoing including fraud, corruption, bribery and money laundering.

The Council insists its commitment to its values and integrity is shared by external suppliers delivering services on its behalf as stated in its approach to [Tenders, contracts and Procurement](#).

### **Respecting the Rule of Law**

The Council appoints a Chief Legal Officer (and Monitoring Officer) who is a member of the County Leadership Group. The Monitoring Officer ensures that decisions are taken in a lawful and fair way and agreed procedures are followed and that all applicable statutes, regulations and procedure rules are complied with.

The Council uses its legal powers, including the '[general power of competence](#)' to promote its values and priorities to the full benefit of the citizens and communities in Norfolk. The Council will have full regard to the extent of its powers and not act beyond them, and will observe specific requirements in legislation as well as general responsibilities of public law.

The Council's decision making process will adhere to the principles of good administrative law, respect human rights and demonstrate rationality, legality and natural justice.

The Council puts in place measures to address breaches of its legal and regulatory powers. The Council's Chief Legal Officer has statutory reporting duties in respect of unlawful decision making and maladministration. Similarly, the Statutory Finance Officer (Section 151 officer) has statutory reporting duties in respect of unlawful and financially imprudent decision making. These duties are detailed at, respectively, [Article 6.5 Annex \(a\)](#) and [Article 7.7\(f\)](#) of the Council's Constitution.

The Council appoints Statutory Officers that have the skills, resources and support necessary to perform effectively in their roles. These officers include:

- Managing Director
- Chief Legal Officer (Monitoring Officer)
- Executive Director of Finance and Commercial Services (Section 151 officer)
- Executive Director of Children's Services
- Executive Director of Adult Social Services
- Director of Public Health
- Deputy Statutory Finance Officer (Deputy Section 151 officer)
- Deputy Monitoring Officer

The Council supports these statutory officers as well as other key post holders and elected members to fulfil their responsibilities within legislative and regulatory requirements.

## **B. Ensuring openness and comprehensive stakeholder Engagement**

### **Openness**

The Council sets out in this Code, its Constitution and in its Annual Governance Statement its commitment to openness.

The Council operates a Committee system of decision making rather than a Cabinet system. Decisions taken by Full Council (in this case referring to the meeting of Council attended by all Councillors), as well as those taken by Committees are [recorded](#) (alongside the reasons and the evidence considered) and, subject to limited exemptions, made in public and information relating to those decisions is made available to the public. Relevant changes will be made for any future changes in committee structure.

The Council ensures that its most significant decisions are recorded and, subject to limited exemptions, information relating to the reasons and evidence considered is made available to the public.

The Council holds its Council and Committee meetings in public with the agenda and public reports and minutes available on the Council website. However, certain exclusions apply where there is a need to protect confidential information or where certain categories of exempt information are being considered. The Council allows for people to make comments live through social media. Its approach in this area is consistent with the requirements of Part 5A of the Local Government Act 1972 and of the [Local Authorities \(Executive Arrangements\) \(Meetings and Access to Information\) \(England\) Regulations 2012](#).

The Council informs, consults and involves residents or representatives of residents in significant decisions and their views are submitted to those making decisions for consideration.

### **Engaging Comprehensively with Institutional Stakeholders**

The Council develops and maintains relationships with leaders of other organisations across the private, public and voluntary sector contributing to the vision for the County, in order to benefit the city and actively drive forward the County's priorities as set out in the County Council Plan.

The Council maintains a [Norfolk Strategic Framework \(in draft at December 2017\)](#) and [Member Forum](#). The Norfolk Strategic Framework relates to the work of Norfolk's local planning authorities and outlines how we meet our statutory duty to cooperate when preparing local plans.

The Council has a range of partnership activity that we are engaged in, as described on the Partnerships [webpage](#).

## **Engaging with Individual Citizens and Service Users Effectively**

The Council strongly believes that consultation, co-design and co-delivery of services is the best way to deliver services that work for Norfolk residents. The Council consults communities, individuals, service users and other stakeholders whenever there is a legal duty to do so, such as in setting the budget, or there is a reasonable expectation that it will, such as where it has consulted on similar matters in the recent past, or where the views of the public and service users will be valuable in informing decisions or the future service delivery model. The Council also talks with residents regularly on a wide variety of issues and topics.

The Council informs, consults and involves residents of Norfolk on issues of interest to them, including through the [Council's online consultation portal](#), and maintaining effective channels for dialogue and debate, including an active Twitter account for quick updates and communication with Norfolk residents.

When conducting consultations the Council strives to balance the feedback it receives from more active stakeholders with that from less active stakeholders through monitoring responses by age, gender, location, ethnicity, sexuality and other factors and delivering targeted promotion where required to ensure that the sample of respondents is representative of the County as a whole.

The Council adopts a "We Asked, You Said, We Did" approach to consultation and promotes material advising the public and other stakeholders of the key findings from consultations and how they have been taken into account.

The Council is committed to considering and acting upon feedback from citizens and service users and so maintains effective [complaints and compliments handling](#) and monitoring procedures so that it can identify where improvements in service delivery are needed and learn effectively from the complaints it has received.

The Council takes account of the impact of decisions on future generations of tax payers and service users, its commitment to doing so is matched by the commitment of the [members of its Youth Parliament](#), which acts to ensure young people have a stronger voice enabling them to influence decision makers in the city and shape future services. The Council also uses relevant communication channels that younger people are more likely to engage in.

The Council as an organisation, and the elected Members that make it up, share a common understanding of their respective roles regarding community engagement and work together to ensure the organisation understands and can effectively respond to local issues and concerns, through mechanisms such as ward coordination.

## **C. Defining outcomes in terms of sustainable economic, social, and environmental benefits**

### **Defining Outcomes**

The vision for Norfolk and the strategic priorities for the Council are stated in the [Vision for Norfolk and Norfolk Futures: the Council's strategy 2018-22](#).

Progress towards the vision described in the strategy will be monitored through the Council's [Annual Governance Statement](#) which comprises and analyses key performance indicators.

The Council's [budget and business planning process](#) allocates resources to progress towards the vision for the County in the most effective and efficient way. The Council sets a [Medium Term Financial Strategy](#) which is documented in the Agenda for the County Council on 22 February 2016 (Please click to link to see page 312 of that agenda). That document sets out the financial assumptions and provides a set of goals for financial decision making for the planning period ahead.

The Council is committed to consulting the people of Norfolk and local businesses in the design of its budget proposals to understand service user's expectations and to inform service users of financial limitations.

It also sets objectives for each directorate as well as the Vital Signs performance monitoring framework that will be followed to track progress towards these objectives from the perspectives of finance, performance, workforce development, equality and risk. This supports the organisation to take a long-term view on decision making balancing the long-term vision with short term imperatives.

### **Sustainable Economic, Social and Environmental Benefits**

The Council is committed to considering the full combined economic, social and environmental implications of its decisions through thorough data analysis and consultation with affected parties so that its decisions advance the achievement of the Council's vision. The Caring for our County priorities are an integral part of the Council's decision making process. The Council will set out in reports recommending a decision, the impact the decision will have on the six broad objectives in the Caring for our County strategy.

The Council's budget and business planning process involves equality action planning. Under this process the Council sets out how it will work towards its agreed equality objectives and where Equality Impact Assessments are required to assess the impact of proposals which may have an impact on different communities of interest across the County. The Council strives to ensure fair access to services and monitors the extent to which this is occurring through its [Communities Committee](#).



## **D. Determining the interventions necessary to optimise the achievement of the intended outcomes**

### **Determining Interventions**

Through monitoring Vital Signs the Committees receive accurate, relevant and timely performance and intelligence to support them with objective and rigorous analysis of options, covering intended outcomes, financial impact and associated risks informing efficient service delivery.

The Council is committed to seeking continuous feedback from citizens and service users both in planning service improvements and service reductions whether through its residents' survey, consultation or bespoke feedback gathering.

### **Planning Interventions**

The Council plans its activity at a strategic level through its budget and business planning cycle and does so in consultation with internal and external stakeholders to ensure services delivered via different parts of the organisation and through our partnerships to complement each other and avoid duplication.

This is facilitated through various partnerships supporting delivery agencies across the county to co-ordinate their activity and consider how they can collaborate to reduce risks to achieving their outcomes. The partnerships include:

- Parish Partnership Schemes
- Multi Agency Safeguarding Hub
- Crime and Disorder Partnerships
- Business Partnerships
- Health Partnerships
- Local Access forum
- National Trails Partnerships

The effectiveness of the Council's interventions and the quality of its services is monitored through the provision of regular performance reports to the relevant Committee showing progress towards goals and targets set in the budget and business plan.

### **Optimising Achievement of Intended Outcomes**

The Council is committed to integrating and balancing service priorities, affordability and other resource constraints supporting it to take into account the full cost of operations over the medium and longer term. As above, the [Medium Term Financial Strategy](#) is documented in the Agenda for the County Council on 22 February 2016 (Please click to link to see page 312 of that agenda). That document sets the context for the Council on significant ongoing financial challenges as well as external changes, such as changes to local government funding arrangements that are planned or forecast to arise during the planning period. The context and documents which support the overall strategy are set out in the [Efficiency Plan](#), published on the Council's website as required by

Government for a four year financial settlement.

The Council procures goods and services in compliance with the law and ensures that value for money is obtained through stimulating effective competition.

In accordance with the Public Contracts (Social Value) Act 2012 the council considers, in respect of each above-threshold procurement, whether it is able to obtain social value through the procurement – this might include social, economic or environmental benefits. Social value might best be driven by including relevant requirements in the specification or the conditions of contract or by evaluating bidders' method statements.

## **E. Developing the entity's capacity, including the capability of its leadership and the individuals within it**

### **Developing the Organisation's Capacity**

The Council monitors its governance and staffing structures to support the delivery of planned services and proactively plans for the future. Through its budget process, the Council ensures services are prioritised so that resources are directed to those activities that will make the greatest contribution to the Council's vision.

The Council continually seeks better outcomes from its use of resources by comparing information about functions, expenditure and performance with those of similar organisations and assesses why levels of economy, efficiency and effectiveness are different elsewhere. It acts upon the findings of this intelligence as part of its budget and business planning to ensure continual effectiveness of service delivery.

Where intelligence suggests alternative delivery methods, such as the establishments of partnerships or other types of collaborative working with other organisations, will lead to improved value for money these are explored.

In line with its People Strategy, the Council develops and delivers workforce plans which set out actions to ensure the workforce has the necessary skills and behaviours to deliver the vision for the County and are effectively engaged to act as champions for the Council's priorities and approaches.

### **Developing the Capability of the Organisation's Leadership and Other Individuals**

The Council Leader and Managing Director have clearly defined roles and maintain a shared understanding of roles and objectives. The Managing Director leads in implementing strategy and managing service delivery and other outputs set by members. The Managing Director and Leader provide a check and balance for each other's authority.

The Council is committed to operating in an efficient and effective way to obtain value for money from its resources. It maintains a [Scheme of Authorisation](#) setting out which decisions and powers have been delegated to various Committee's and other officers.

So that elected members and senior officers have a shared understanding of their respective roles the Council has produced [a Protocol governing Member/Officer relations](#).

The Council maintains a 'Golden Thread' linking individual staff objectives to team plans, directorate budget and business plans and the strategy for the Council so that all staff are aware of how their role supports the vision for the County and are held to account for their role in its delivery. Following this process staff consider with their line manager what training, development and support they need to succeed in their role.

The Council believes that governance is strengthened by the participation of people with many different types of knowledge and experience. Where external recruitment takes place, individuals from a range of backgrounds and communities are made aware of opportunities to join the Council. The Council is also committed to promoting electoral registration and participation and confidence in the integrity of the electoral process.

The Council is committed to developing the capability of people with governance responsibilities, evaluating their performance and ensuring that all staff understand the importance of governance within their role. As part of this, the Council provides an effective induction and training programme for Members and Officers tailored to individual needs and provides regular opportunities for them to learn about new developments key to their role as well as effective training and guidance for Members and Officers to understand their governance responsibilities.

The Council's framework for leadership and management development establishes a clear approach across the themes of: developing future leaders, self-reflection, induction, development, connecting with the region, engagement, learning and development and feedback and self-assessment.

The Council is consistent on consulting staff and their representatives on decisions regarding the terms and conditions of employment and the policies staff are subject to.

The Council regularly surveys staff to understand their views on the Council as an employer, including the effectiveness of its leadership.

The Council is committed to promoting the physical and mental health and wellbeing of the workforce as a core component of the People Strategy through both specific interventions and opportunities and as a central part of the role of all managers. This work is overseen by the JCNC which also includes representatives from Trade Unions.

The Council has an open and welcoming approach to external and peer review and inspection and actively considers constructive feedback.

## **F. Managing risks and performance through robust internal control and strong public financial management**

### **Managing Risk**

The Council operates a risk management framework that aids decision making in pursuit of the organisation's strategic objectives, protects the Council's reputation and other assets and is compliant with statutory and regulatory obligations. The framework is documented in a [Risk Management Policy](#) which is submitted to the Council's Audit Committee; the strategy involves regular appraisal of the effectiveness of risk management arrangements, involving elected members in the process of doing so. The implementation of the strategy is supported through a programme of risk management training for officers and members. The Council maintains a [Corporate Risk Register](#) identifying named risk managers for its key strategic risks.

Risk management is also an integral component of the budget and business planning process, linking risk management to the achievement, monitoring and resourcing of objectives at directorate level.

### **Managing Performance**

The Council puts in place measures to monitor service delivery whether services are produced internally or through external providers. Vital Signs are reported to Committees. Key Performance Indicators (KPIs) setting out the effectiveness of services are made available to service managers to inform and support accountability for delivery. Reports compiling KPIs are submitted to directorate management teams to support transparency and resource allocation to address challenges. Performance management remains relevant to the organisation through the business planning process where directorate objectives are reviewed, leading to a review of the relevant performance indicators to monitor progress towards them.

Performance of services delivered through external companies, including wholly owned companies, is monitored with those providers so that a shared understanding of contract performance is achieved. Similarly the Council monitors performance towards objectives set at a partnership level with key partners providing appropriate support to enable any barriers to continuous performance improvement to be addressed.

Relevant, objective and reliable performance information is used to inform decision making, alongside financial implications and risk information.

### **Effective Overview and Scrutiny**

The Council operates a Committee structure and decisions are delegated to politically proportionate Committees by the Full Council according to the Council's Constitution. As part of the Council's scrutiny arrangements a Health Scrutiny Committee, a Health and Wellbeing Board and Police and Crime Panel have been established.

## **Robust Internal Control**

Internal Control within the Council supports the achievement of objectives by managing risks while complying with regulations and organisational policies. Internal controls seek to protect the Council's resources against loss, fraud, misuse and damage and to safeguard the availability, confidentiality and integrity of its ICT and information systems.

The Council maintains clear policies and arrangements in respect of counter fraud and anti-corruption. These are the [Anti-Fraud, Bribery and Corruption Policy](#); and [Whistleblowing Policy](#) .

The Council ensures an independent [Audit Committee](#) is in place which provides a mechanism for effective assurance regarding risk management and the internal control environment.

## **Managing Data**

The Council is committed to safeguarding the personal data it holds and sharing this data only in circumstances required or permitted by law. It has established and regularly reviews policies relating to records management, data quality, data protection and information security and provides data protection training and raises awareness of essential practices amongst staff. Personal data is processed in accordance with the Data Protection Act 1998 and in particular it's eight data protection principles. Information Governance is overseen by the Executive Director of Finance and Commercial Services who is the Senior Information Risk Officer for the Council (SIRO).

The Council is committed to sharing appropriate data safely with other agencies; where this improves effective and efficient service delivery, supports its objectives and the vision for the County and is compatible with the rights of individuals.

The Council complies with the [Local Government Transparency Code 2015](#) by publishing accurate data within appropriate time frames in accordance with the terms of the [Open Government License](#) together with additional data of value to stakeholders and the public.

The Council keeps under regular review the quality and accuracy of the data it produces, and uses in decision making and performance monitoring.

The Council makes information available to the public via the information access regimes provided for by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. Individuals may also access their own personal data by exercising the right of subject access under the Data Protection Act 1998.

## **Strong Public Financial Management**

The Council's approach to Financial Management ensures that public money is safeguarded at all times ensuring value for money. Its approach supports both long

term achievement of objectives and shorter term financial and operational performance.

The Executive Director of Finance and Commercial Services who is the Statutory Finance Officer, the Section 151 Officer, ensures that appropriate advice is given on all financial matters, proper financial records and accounts are kept, and oversees an effective system of internal financial control. The Section 151 Officer ensures well developed financial management is integrated at all levels of planning and control including management of financial risks and controls.

## **G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability**

### **Implementing Good Practice in Transparency**

The Council is committed to publishing information including reports in a manner which is accessible to citizens and other stakeholders. Information is produced in an open and understandable style appropriate to the intended audience and the communication channel, including web-based and social media. The publication of information will strike a balance between satisfying transparency demand and becoming too onerous for users to understand.

The Council maintains a coherent and consistent approach to the management of social media, both with regards to messages sent out from the Council as well as those sent by individual staff members and elected Members, to reduce the risks of any breaches of legislation or reputational damage.

### **Implementing Good Practices in Reporting**

The Council seeks to demonstrate to its stakeholders that it has delivered on its commitments and goals and has used public resources effectively in so doing. To this end it publishes an [Annual Report](#) as part of its accounts, setting out how it has performed, delivered value for money and exercised sound stewardship of resources.

The Annual Report includes performance information accompanying the financial statements that allow for comparison with other similar local authorities to be made. This information is drawn from the Council's Annual [Statement of Accounts](#) publication which charts the Council's progress towards its vision.

The Council has a legal responsibility to conduct, at least annually, a review of the effectiveness of its governance framework including its system of internal control and document the findings in an [Annual Governance Statement](#). The Council also summarises the findings from the review in an easily digestible format within the Annual Report.

### **Assurance and Effective Accountability**

The Council welcomes peer challenge, internal and external review and audit, and inspections from regulatory bodies and gives thorough consideration to arising recommendations. It puts in place arrangements for the implementation of actions agreed to be taken as a result and there is clear oversight from elected members on the conclusions and resultant actions.

The Council is committed to working with third parties in pursuit of the vision for the County and carrying out its functions in an efficient and effective way. To this end the Council will manage risks to its financial position, objectives and reputation resulting from services being delivered through third parties. This process will be open and transparent and will involve elected members.



## Monitoring and Review

This Code will be reviewed on an annual basis to ensure it is kept up to date. Where the review identifies that changes to the Code are necessary, the revised Code will be submitted to the Policy and Resources Committee for approval before being incorporated within the Council's Constitution.

The Council has three Committees that are jointly responsible for monitoring and reviewing aspects of the Council's Corporate Governance arrangements. These Committees are:

- [Audit Committee](#) - responsible for approving the Council's annual accounts and responding to the External Auditor's Annual Audit Letter. It also oversees the effectiveness of the Council's governance and risk management arrangements, the internal control environment, the whistleblowing policy and associated anti-fraud and anti-corruption arrangements.
- [Policy and Resources Committee](#) – reviews how the Council uses its resources effectively and efficiently to deliver services for Norfolk residents. It also looks at governance arrangements of the Council and its partners in the public sector, to ensure the views of local residents and their representatives are reflected in decisions it takes.
- [Standards Committee](#) – responsible for promoting and maintaining high standards of conduct amongst Members, for advising the Council on the adoption and revision of the Code of Conduct for Members and for monitoring the operation of the Code.

Full terms of reference for each of these Committees are included in the Council's [Constitution](#). All Members of the Council are informed of the work of these Committees through minutes submitted to Council.

The Council will ensure that corporate governance arrangements are kept under continual review by updating, as appropriate, these Committees on:

- The work of Internal and External Audit
- The opinion of other review agencies and inspectorates
- Opinions from the Council's Statutory Officers
- General matters relating to the implementation of the Code
- The production of the Annual Governance Statement and actions planned to address arising governance issues.

## The Annual Governance Statement

Each year the Council will publish an [Annual Governance Statement](#) to accompany the [Annual Statement of Accounts](#). The Statement provides an overall assessment of the Council's corporate governance arrangements and how it adheres to the governance standards set out in this Code. Evidence relating to the principles of this

Code is reviewed and analysed to assess the robustness of the Council's governance arrangements.

The Statement includes an appraisal of the key controls in place to manage the Council's principal governance risks and the effectiveness of systems and processes governing decision making and financial control. The Statement also provides details of where improvements need to be made. Actions to address significant governance issues are identified and recorded in an action plan. The Annual Governance Statement is audited by the Council's external auditors as part of the audit of the annual accounts.

A handwritten signature in black ink, appearing to read 'W. Thomson', is displayed on a light-colored rectangular background.

**Dr Wendy Thomson CBE**  
Managing Director

26 March 2018