

Council

Public minutes of the 145th meeting of the Health and Care Professions Council as follows:-

Date: Wednesday 28 September 2022

Time: 10am

Venue: Video conference

Present: Christine Elliott (Chair)

Meera Burgess*

Stephen Cohen

Heeral Davda*

Maureen Drake

Rebekah Eglinton

Kathryn Foreman

Sue Gallone (from item 13)

Helen Gough

Eileen Mullan

David Stirling

Kathryn Thirlaway

Valerie Webster

Steven Vaughan (from item 13)

In attendance:

Claire Amor, Secretary to Council

John Barwick, Chief Executive and Registrar

Alastair Bridges, Executive Director of Resources and Business Performance

Nesta Caiger, Insight and Intelligence Analyst

Mark Caprio, Deputy Director of Fitness to Practice

Gareth Davies, Head of Insight and Analytics (from item 4)

Rosemary Flowers-Wanjie, Policy Manager (from item 4)

Kathryn Flynn, Department of Health and Social Care

Colette Higham, Professional Standards Authority

Alan Keshtmand, Head of Finance (until item 4)

Emma Leary, Head of Policy, Standards & Strategic Relationships (from item 4)

Dave Munday, Unite The Union

Rachel Murphy, FtP Operational Manager - Work Practice Improvement

Naomi Nicholson, Executive Director of Professional Practice and Insight

James Penry-Davey, Capsticks LLP

Laura Ryan, Kingsley Napley

Andrew Smith, Executive Director of Regulation

*Council Apprentice

Public Agenda

Item 1. 22/103 Chair's welcome and introduction

- 1.1 The Chair welcomed those present to the 145th meeting of Council.
- 1.2 The Chair extended a special welcome to Dave Munday as this was his first meeting of the Council as an observer. Dave introduced himself to the Council and summarised his role as Lead Professional Officer at Unite the Union.

Item 1.i. 22/104 Apologies for absence

- 1.i.1 The Council noted that members, Steven Vaughan and Sue Gallone would join the meeting from item 12.

Item 1.ii. 22/105 Approval of Agenda

- 1.ii.1 The Council approved the agenda.

Item 1.iii. 22/106 Declaration of Members' interests

- 1.iii.1 Members had no interests to declare.

Item 1.iv. 22/107 Minutes of the Council meeting of 21 July 2022

- 1.iv.1 The Council approved the minutes of its meeting of 21 July 2022.

Item 1.v. 22/108 Matters arising

- 1.v.1 The Council noted those matters arising from previous meetings.

Standing reports

Item 2. 22/109 Chief Executive's performance report

- 2.1 The Council received a standing report from the Chief Executive.

- 3.2 The Council noted the following points:-

- the report included the Corporate Plan 2022-23 milestones tracker, KPI dashboard and updated Strategic Risk Register which was considered alongside the Operational Risk Register by the Audit and Risk Assurance Committee at its September 2022 meeting;

- stakeholder engagement in the period had focused on the HCPC's financial sustainability and proposed fees consultation, this had included a number of meetings with the trade unions, professional bodies and government officials;
- international application processing times had continued to improve, with the median time taken for applications to reach a first assessment decision being within service standards;
- the introduction of online applications for UK applicants and the establishment of a dedicated UK applications team had enabled all UK applications to be processed within service standards during the summer peak months following programme graduation. Historically this period had seen a decline in UK application processing performance. This indicated that the changes made had ensured greater resilience within the registrations team to manage peaks in activity;
- registration responsiveness had improved, with emails being consistently answered within service standards. While further improvement to telephone responsiveness was needed, some improvement had been achieved as a result of a new cloud telephony system and training more registration advisors to answer calls;
- at the time of writing the report the Executive had expected the temporary register to close at the end of September 2022. However, a recent announcement from the new Secretary of State for Health and Social Care included the intention to keep the temporary registers open for a further two years. The HCPC was in discussions with Department of Health and Social Care (DHSC) officials about the continued operation and concerns regarding public protection risk had been highlighted, as well as the continuing costs to the regulators. A policy paper on the management of the temporary registers would be presented to the Council at a future meeting; and
- the HCPC's employee turnover rate had reduced in the first two quarters of 2022-23 demonstrating the impact of the HCPC's People Strategy actions. A quarterly all employee survey took place over the summer and the analysis would be presented to the People and Resources Committee in November 2022.

- 3.3 The Council welcomed the improved registration email responsiveness and noted the need to see further improvement in telephone responsiveness. The Council noted that the recently upgraded telephone system provided the Executive with more comprehensive management data, enabling peak call period redeployment. The establishment of a dedicated, and fully call handling trained, UK application team would also assist in improving telephone responsiveness.
- 3.4 The Council discussed the development of the HCPC's Professional Liaison Service, noting that a Scotland based Professional Liaison Consultant was in place and key stakeholder meetings were underway. Recruitment for Northern

Ireland and Wales based Consultants was underway. Council member David Stirling requested to be engaged with the developing work of the Scotland based consultant.

- 3.5 The Council discussed the support provided to international registrants. It was noted that whilst the HCPC did not hold data about international registrants' onward employment, all new international registrants were invited to the HCPC's 'welcome to the UK' webinars to support their orientation to the UK healthcare environment as well as exploring the HCPC's standards for practise. In addition, all HCPC registrants received the HCPC's regular registrant newsletter, which provided key updates on changes to standards and guidance. The Chief Executive noted that data from other health profession regulators indicated that attrition rates were higher for international registrants and that strong support was key to ensuring international registrants remained in the UK workforce in the long term.
- 3.6 The Council noted that data on other regulators' performance was available in the PSA's annual report. The Council asked if this data provided a benchmark for the HCPC to review its FtP KPI measures. The Executive Director of Regulation noted that a comprehensive review of the FtP KPIs would be part of the HCPC's work to implement a 'frontloading' FtP investigations model. This review would also take into account comparator regulators' performance measures, however he noted the need to take into account performance variances due to differences in underlying legislation.
- 3.7 The Council discussed the Corporate Plan 2022-23 deliverables update, included within the report. The review of tone of voice within FtP was raised as an important area to make progress on at pace, given the impact on those involved in FtP processes. The Chief Executive agreed as to its importance noting that significant work had already been undertaken with all employees taking part in compassionate regulator training, and a guidance style guide document had been produced. External expertise had been secured to take forward the review of FtP template correspondence which included over 300 templates. This work was expected to complete before the end of the 2022-23 financial year.
- 3.8 The Council discussed Partner performance feedback, noting that the experience of those members of Council undertaking the Registration Appeals Chair role had been that no feedback on performance had been provided to them, whilst they had provided feedback regularly. Due to this there was a need for assurance that individual user departments were undertaking active performance monitoring. The Executive would report back to the People and Resources Committee on this point.
- 3.9 The Council asked the Executive to summarise the feedback it had received during early stakeholder engagement on the HCPC's proposed fee increase. The Chief Executive noted that the proposed increase had not been welcomed in the context of the challenging external economic situation, however the HCPC's need for financial sustainability had been acknowledged. The role of government in funding the HCPC had been raised by some stakeholders as well as feedback on actions the HCPC could take to improve and target its communications to registrant groups.

- 3.10 The Council noted that work was underway to ensure that the HCPC would be compliant with the new Professional Qualifications Act 2022. The Council asked for clarification of where compliance issues were. The Executive Director of Professional Practice and Insight advised that the main focus for regulators in ensuring compliance with the Professional Qualifications Act was ensuring the publication of particular information. The HCPC had received legal assurance on its compliance and a small number of minor changes to website information were being made for clarity.
- 3.11 The Council noted that the impact of online registration capability on the first registration timing patterns for new graduates would be considered at the end of 2022, as the picture was not clear. However, the Executive did not expect the overall new registrations number to change from previous years and data showed a trend of growth. The Council stressed the need to maintain close monitoring of this given healthcare workforce challenges.

Item 3. 22/110 Finance Report

- 3.1 The Council received a standing report from the Head of Finance. The report presented the HCPC's financial position at the end of August 2022.
- 3.2 The Council noted the following points:-
- year to date income was £15.4m compared with the forecast of £15.3m, giving a favourable variance of £0.1m. A deep-dive exercise would be carried out on renewal and registration fees to refine the forecast accuracy;
 - operating expenditure was £0.5m favourable to forecast. Pay expenditure was in line with forecasted figures, with the majority of the underspend relating to non-pay expenditure due to timing of costs. Professional fees and partners costs made up the majority of the underspend and a detailed review of these costs would be undertaken as part of the quarter two forecast;
 - an administrative error had resulted in a double counting when forecasting the PWC registration support costs earlier in the year, this had been corrected adding £0.2m to the underspend; and
 - the year to date surplus was £1.6m against the forecast of £1.0m, giving a favourable variance of £0.6m. the Executive forecasted that the HCPC's financial position would move towards a deficit in the second half of 2022-23 as vacant posts were filled and non-pay related costs including legal and partners costs increased, coupled with a forecasted slow-down in international applications. The overall forecasted year end position was a deficit of £0.9m.
- 3.3 The Council discussed international application forecasting. The Council agreed that ensuring operational flexibility to scale up and down to meet

demand was essential. It was noted that PWC remained on standby should unexpected or unmanageable peaks reoccur, however the Executive would seek to prepare to meet any demand internally in the first instance.

- 3.4 The Council asked if the Executive was engaged with those charged with workforce planning across the UK to seek to better inform international registration forecasting. It was noted that the Executive was actively engaging with employers and bodies such as Health Education England to ensure the HCPC had prior notice of significant international recruitment campaigns.
- 3.5 The Council thanked the Head of Finance for the continued improvement in the quality of financial reporting.

Item 4. 22/111 Fitness to Practise Report

- 4.1 The Council received a standing report from the Executive Director of Regulation.
- 4.2 The Council noted the following points:-
 - interim order (IO) timeliness had improved with the three-week target to take a case from the need for an order being identified to a hearing, being met. The 12-week target from initial receipt to panel had not been met and was 22 weeks in August and July 2022. Performance against measure was impacted by ongoing third-party investigations which must either be concluded or reach an appropriate evidentiary stage before an IO could be obtained;
 - internal targets for case planning quality checks had been met since May 2021 and the onward stretch target had also been met. Targets for this measure were under review to ensure ongoing performance stretch;
 - the age range of open cases had increased, as more older cases were concluded or progressed, however younger cases were also being closed showing that the progression of older cases had not been at the expense of close management of new incoming cases;
 - the FtP forecast model had proved accurate for pre ICP case median age however the post ICP median had proved more variable and challenging to forecast due to the lower number of cases being concluded at this stage and the difficulty of predicting when cases would be able to be scheduled for a final hearing;
 - the open caseload had remained stable through 2022 to date, a positive indication that no new backlog was building;
 - phase two of the FtP Improvement programme consisted of workstreams focused on improving the FtP process experience for participants. This included a review of the FtP tone of voice, and the

use of consensual disposal to enable a more proportionate approach; and

- HCPC had, through a partner charity, launched a lay advocacy service targeted towards complainants and witnesses who may need additional support to access and engage effectively with the FtP process.

4.3 Rachel Murphy, FtP Operational Manager for Work Practice Improvement summarised the FtP Department's work to support its people. The Council noted that:-

- a key part of the FtP improvement programme had been to create the right culture for FtP, tools used had included the daily huddle structure implemented as part of the PWC perform plus model;
- the daily huddle provided a space for sharing successes and problem solving. A key focus of these huddles was wellbeing and all team members reported their mood anonymously to enable management to monitor where wellbeing may be suffering;
- the Department had a network of 'champion' employees who acted as subject matter experts for specific processes such as risk assessments;
- management was focused on ensuring feedback from employees received consideration and a response. One way of doing this was regular 'you said we did' communication following department surveys;
- incentive schemes and rewards were in place for all FtP team members, to recognise and reward productivity and performance, good customer service and examples of behaviours that reflected the HCPC values; and
- productivity had shown some dips over the previous year, an example being when the new case management system was introduced and the team took time to adjust to new ways of working; however overall, the data showed that productivity had increased as a result of the FtP Improvement Programme.

4.4 The Council noted that team member performance was openly discussed within teams and asked how FtP management monitored any pressure or impact of this approach. It was noted that the FtP department did seek to have a performance culture with targets and goals being an important part of that culture, but so too was recognition and reward for performance, as well as joint problem solving, and daily wellbeing check-ins. FtP leadership monitored feedback on wellbeing regularly and would seek to intervene and make improvements where issues were identified. Work on caseloads had been a focus of the FtP improvement work and remained an acknowledged area for further improvement

- 4.5 The Council welcomed the Executive's work on FtP forecasting and noted that bi-annual forecasting may have more utility and accuracy than annual forecasting.
- 4.6 The Council welcomed the introduction of a lay advocacy service for those taking part in FtP processes. The Council noted the importance of the language used when promoting the use of the service to minimise any fear of stigma due to needing additional help. The Council also agreed on the importance of user feedback to evaluate the impact of the service and its accessibility. It was noted that the use of the service would be actively monitored, and regular service meetings would take place with the provider. FtP employees had been trained on the use of the service and how to identify and reach out to those who would benefit from the service. Additionally, users could refer themselves to the service using the information available on the HCPC's website. Data and analysis on the use of the service would be reported to the Council at a future meeting.
- 4.7 The Council discussed FtP data reporting, noting that this remained a largely manual and time-consuming process. The Executive Director of Regulation advised that the phase two FtP case management system project would deliver better management reporting functionality.
- 4.8 The Council noted the high output nature of the triage team which impacted on the utility of comparisons month on month to a productivity baseline.
- 4.9 The Council noted that following its decision to seek legislative change to enable virtual hearings to continue on a permanent basis, the majority of hearings remained virtual. Data on the split between in person and virtual hearings would be included in future papers. **ACTION.**
- 4.10 The Council discussed the use of temporary staff within the FtP department. The Council noted that FtP employee turnover had reduced to 11% and that as a result the department had been able to establish a rolling recruitment approach, however challenges in getting enough suitable candidates had prevented the team from reaching an 'over recruited' level which would prevent the need for temporary resource.
- 4.11 The Council noted that a focus of the PWC perform plus programme was manager development and training. In addition, the HCPC's internal leadership development programmes were used by the FtP Department to invest in its managers and aspiring managers and ensure a continuous improvement focus was in place.
- 4.12 The Council noted the importance of acknowledging that some cases' progress was impacted by factors outside of the HCPC's control, and ensuring that FtP employees saw that this was acknowledged as a factor by management. The Executive Director of Regulation agreed, noting that the huddle meeting approach enabled the sharing of these factors and joint problem solving on a daily basis. He added that enhancements to the FtP case management system planned as part of the phase two improvement projects, would enable better separation of these cases in the performance data.

- 4.13 The Executive took an action to review the status ratings in the report and to ensure consistency of reported statuses across all reports to Council.
- ACTION.**
- 4.14 The Chair thanked the Executive for an informative report, noting the theme of employee support and wellbeing, as well as performance assurance, had been key to Council's discussion.

Item 5. 22/112 Insights and Intelligence Framework one year review

- 5.1 The Head of Insights and Analytics presented a review of the first year of the Insights and Analytics Framework operation. The presentation covered progress to date, achievements, challenges and future priorities.
- 5.2 The Council discussed the potential of a data explorer tool for stakeholder use. It was noted that ensuring the data provision was informed by what was useful to stakeholders would be key.
- 5.3 The Council welcomed the work of the Insights and Analytics team and the first year of development under the Insights and Intelligence Framework. It was noted that the Council would discuss the data on registrant attrition at its meeting in October 2022.

Item 6. 22/113 Standards of Conduct Performance and Ethics Review

- 6.1 The Council received a paper from the Policy Manager
- 6.2 The Council noted the following points:-
- the HCPC's standards were reviewed regularly to ensure that they remained relevant to current practice and were well understood by registrants. The Executive had commenced a review of the Standards of Conduct Performance and Ethics (SCPEs)
 - the SCPE's review would include a review of the supporting guidance and online materials, including on social media, safeguarding and duty of candour;
 - pre-consultation stakeholder engagement had commenced to inform planning for the review. Based on this engagement, significant change to the SCPE's was not expected, however with wider engagement this could change;
 - the Education and Training Committee had reviewed and recommended to Council the proposed review approach, timeline and areas to explore in the consultation;

- Committee members had raised concerns about the delivery timeframe of the consultation and overlap with other HCPC projects and consultations resulting in stakeholder fatigue, this would be mitigated by managing timing launch and continuous activity throughout the review to ensure that stakeholders see progression; and
 - the consultation document would be presented to the Council for approval at its October 2022 meeting.
- 6.3 The Council discussed the risk of the current SCPE's not adequately addressing the areas outlined by the Executive for review, which included equality, boundaries, and social media. The Council noted its concern that a one-year implementation process was a long time to wait if the risk was significant. The Policy Manager noted that the proposed changes had been risk assessed and a one-year implementation period was considered appropriate given the need to allow education providers adequate time to make changes to programme design or deliver to meet any revised standards. A one-year implementation period was in line with that given by government and other regulators when requiring change.
- 6.4 The Council noted that proposals on challenging discrimination would include the resources to support registrants to recognise discrimination.
- 6.5 The Council noted the complexity of introducing any professional standard focused on sustainability, and interaction and tension between other standards or healthcare structures and ways of working beyond the control of registrants. The Council agreed that the HCPC could not effectively act as a source of advice or guidance on sustainability.
- 6.6 The Council approved the approach to the review of the Standards of Conduct Performance and Ethics as outlined in the paper and recommended by the Education and Training Committee.

Items to note

The Council noted the following items:

Item 7. 22/114 Decisions outside of meeting

Item 8. 22/115 Unconfirmed minutes of the People and Resources Committee meeting of 6 September 2022

Item 9. 22/116 Unconfirmed minutes of the Education and Training Committee meeting of 7 September 2022

Item 10. 22/117 Unconfirmed minutes of the Audit and Risk Assurance Committee meeting of 14 September 2022

Item 11. 22/118 Any other business

- 11.1 The Chair invited observer Dave Munday to share his reflections on the meeting. Dave made the following observations:-
- the use of virtual meetings was welcomed as enabling greater stakeholder access to important discussions impacting on registrants;
 - he considered that more registrants should observe a Council meeting for their understanding of how their profession was governed and gain an appreciation of the range of issues discussed;
 - he noted that the chief Executive's reflections on the stakeholder reaction to the proposals to increase the registration fee were accurate. Dave noted the HCPC's challenging financial situation but reflected on the challenging financial situation facing many registrants due to the cost of living crisis and impact of the mini budget on mortgage rates.; and
 - Dave raised the issue of the Disclosure and Barring Service's role and its impact on registrants and suggested this as an area for future Council discussion.

- 11.2 The Chair thanked Dave for his valuable feedback and took an action to include a discussion on the Disclosure and Barring Service as relating to registrants at a future meeting. **ACTION.**

Item 12. 22/119 Resolution

The Council adopted the following resolution:

'The Council hereby resolves that the remainder of the meeting shall be held in private, because the matters being discussed relate to the following;

- (a) information relating to a registrant, former registrant or application for registration;
- (b) information relating to an employee or office holder, former employee or applicant for any post or office;
- (c) the terms of, or expenditure under, a tender or contract for the purchase or supply of goods or services or the acquisition or disposal of property;
- (d) negotiations or consultation concerning labour relations between the Council and its employees;
- (e) any issue relating to legal proceedings which are being contemplated or instituted by or against the Council;
- (f) action being taken to prevent or detect crime to prosecute offenders;
- (g) the source of information given to the Council in confidence; or
- (h) any other matter which, in the opinion of the Chair, is confidential or the public disclosure of which would prejudice the effective discharge of the Council's functions.

Item	Reason for Exclusion
13	H
14	H
15	H
16	H
17	H

Chair:

Date:

Unconfirmed

Council

Public minutes of the 146th meeting of the Health and Care Professions Council as follows:-

Date: Thursday 20 October 2022

Time: 2pm

Venue: Video conference

Present: Christine Elliott (Chair)
Meera Burgess*
Stephen Cohen
Heeral Davda*
Maureen Drake
Kathryn Foreman
Sue Gallone
Helen Gough
Eileen Mullan
David Stirling
Kathryn Thirlaway
Valerie Webster
Steven Vaughan

In attendance:

Claire Amor, Secretary to Council

Zoe Allan, Governance Officer

John Barwick, Chief Executive and Registrar

Alastair Bridges, Executive Director of Resources and Business Performance

Nesta Caiger, Insight and Intelligence Analyst

Gareth Davies, Head of Insight and Analytics

Alan Keshtmand, Head of Finance

Emma Leary, Head of Policy, Standards & Strategic Relationships

Naomi Nicholson, Executive Director of Professional Practice and Insight

Andrew Smith, Executive Director of Regulation

*Council Apprentice

Public Agenda

Item 1. 22/125 Chair's welcome and introduction

1.1 The Chair welcomed those present to the 146th meeting of Council.

Item 1.i. 22/126 Apologies for absence

1.i.1 Apologies for absence were received from Rebekah Eglinton and Heeral Davda.

Item 1.ii. 22/127 Approval of Agenda

1.ii.1 The Council approved the agenda.

Item 1.iii. 22/128 Declaration of Members' interests

1.iii.1 Eileen Mullan declared an interest in item 7, Council Apprentice 2023, as one of the options presented included an externally run scheme she was closely involved in the management of. It was agreed Eileen would leave the meeting for that item. Members had no other interests to declare.

Item 2. 22/129 Preceptorship Principles Consultation

2.1 The Council received a paper from the Head of Policy, Standards and Strategic Relationships. The paper sought the Council's approval to launch a public consultation on proposed preceptorship principles.

2.2 The Council noted the following points:-

- the HCPC had been commissioned by Health Education England (HEE) to develop draft preceptorship principles;
- following wide stakeholder engagement, the proposed principles were discussed with the Education and Training Committee (ETC) in September 2022. ETC had recommended that the Council agree to launch a public consultation;
- the HCPC was not required by its legislation to consult on the principles, as the principles would form non-statutory guidance outside the HCPC's regulatory framework. However, the Executive and ETC recommended that a public consultation be held to provide an opportunity to deepen engagement and ensure the principles met the needs of stakeholders; and
- it was proposed that the public consultation would run for 8 weeks with supporting stakeholder engagement throughout the consultation

period. The Executive anticipated returning to the Council with the results of the consultation at its February 2023 meeting.

- 2.3 The Council noted that the principles would not be enforceable as they would sit outside of the HCPC's legislative regulatory framework. The principles were aimed at helping new registrants and employers (in developing preceptorship programmes). HEE would take forward the programme development work with employers, rather than this being the HCPC's remit.
- 2.4 The Council discussed the importance of precise wording in relation to the term principles, noting that if there was no statutory footing for the principles and they would not be enforced, terming them guidance may be more appropriate. The Council also suggested that a clear statement of the purpose of the principles and their use be included at the start of any published document. The Executive noted that some HCPC guidance did have a statutory footing so the potential for confusion would remain should the term guidance be used. The Executive would reflect on the language used.
ACTION.
- 2.5 The Council noted that the HCPC's data analysis had found there was a 94% retention rate within 4 years of joiners to the register. The Council asked for the Executive to explore how this compared with non-HCPC regulated healthcare professions in order to provide greater clarity as to whether the HCPC's attrition rate was an outlier. **ACTION.**
- 2.6 The Council noted the importance of preceptorship support for more isolated workers without institutional support systems. A wide consultation reach was needed to seek the views of these registrants.
- 2.7 The Council noted concerns regarding stakeholder consultation fatigue, given the HCPC fees consultation and standards of conduct performance and ethics consultation would be live during the same period. The Executive advised this was being mitigated by staggering the start and end dates of the consultations as well as extensive dedicated engagement with key stakeholders to ensure their input.
- 2.8 The Council noted the reference to regional preceptorship support programmes in operation across the UK. The Council noted the need to ensure that any HCPC communication did not give registrants the impression that the HCPC's principles superseded these programmes, but instead were complimentary.
- 2.9 The Council welcomed the partnership work with HEE on preceptorship and approved the presented document for public consultation.

Item 3. 22/130 Resolution

The Council adopted the following resolution:

'The Council hereby resolves that the remainder of the meeting shall be held in private, because the matters being discussed relate to the following;

- (a) information relating to a registrant, former registrant or application for registration;
- (b) information relating to an employee or office holder, former employee or applicant for any post or office;
- (c) the terms of, or expenditure under, a tender or contract for the purchase or supply of goods or services or the acquisition or disposal of property;
- (d) negotiations or consultation concerning labour relations between the Council and its employees;
- (e) any issue relating to legal proceedings which are being contemplated or instituted by or against the Council;
- (f) action being taken to prevent or detect crime to prosecute offenders;
- (g) the source of information given to the Council in confidence; or
- (h) any other matter which, in the opinion of the Chair, is confidential or the public disclosure of which would prejudice the effective discharge of the Council's functions.

Item	Reason for Exclusion	Comment
4	H	For future publication
5	H	Confidential until laid in parliament
6	H	Confidential until laid in parliament
7	H	For future publication
8	H	Confidential

Chair:

Date: