



Mae'r ddogfen hon ar gael yn Gymraeg yn ogystal â Saesneg.

This document is available in Welsh as well as English.

<b><u>Members:</u></b>	Mr Malcolm MacDonald (MM) Mr Martin Evans (ME) Mr Andre Morgan (AM) Mr Alasdair Kenwright (AMSK) Ms Kate Curran (KC)
<b><u>Also Present:</u></b>	Mr Dafydd Llywelyn Police & Crime Commissioner (PCC) Mr Mark Collins, Chief Constable (CC) Mrs Carys Morgans, Chief of Staff (CoS) Ms Beverley Peatling, Chief Finance Officer (CFO) Mr Edwin Harries, Director of Finance (DoF) Mr Ian Williams, Assistant Director of Finance (IW) Ms Helen Cargill (TIAA), (HC) Miss Caryl Bond, Assurance Support Officer (CB) Mr Huw Morgans, Risk & Business Continuity Management Advisor (HM)
<b><u>Apologies:</u></b>	Ms Vicky Davies, TIAA (VD) Mr Richard Harries, WAO, (RH) Mr Jason Blewitt, WAO (JB)
<b><u>Declarations of Interest:</u></b>	None.

ACTION SUMMARY FROM MEETING ON (30 <sup>th</sup> July 2019)			
Action N <sup>o</sup>	Action Summary	To be progressed by	Progress
<b>A101 2018/19</b>	<b>The ToR to be amended to include agreed changes in relation to the tenure of the JAC Chair being open-ended with and election-taking place every three years.</b>	<b>OPCC</b>	<b>Complete</b>
<b>A101 2018/19</b>	<b>The revised JAC ToR to be published on the Commissioners website.</b>	<b>OPCC</b>	<b>Complete</b>
<b>A106 2018/19</b>	<b>The draft Letter of Representation of the Police and Crime Commissioner was recommended for signature by the appropriate signatories.</b>	<b>CC/PCC</b>	<b>Complete</b>
<b>A106 2018/19</b>	<b>The draft Letter of Representation of the Chief Constable was recommended for signature by the appropriate signatories.</b>	<b>CC/PCC</b>	<b>Complete</b>

<b>A107 2018/19</b>	<b>For the work in relation to the Counter-fraud and anti-corruption policy to be brought to the Committee in the future.</b>	<b>CFO</b>	<b>Complete</b>
<b>A107 2018/19</b>	<b>For JAC to be referenced as an arrangement to report within the Management's response to the audit enquiries on arrangements for the prevention and detection of fraud.</b>	<b>WAO</b>	<b>Complete</b>
<b>A108 2018/19</b>	<b>For the table on page 40 to be amended before the Statement of Accounts are signed.</b>	<b>DoF</b>	<b>Complete</b>
<b>A108 2018/19</b>	<b>The Committee recommend the Draft Annual Statement of Accounts for 2018/19 to both the PCC and CC for approval.</b>	<b>PCC/CC</b>	<b>Complete</b>
<b>A109 2018/19</b>	<b>TIAA to provide feedback at the next meeting on how the principles as set out in the CIPFA Statement Role of Head of Internal Audit document apply to TIAA as an organisation.</b>	<b>TIAA</b>	<b>Complete</b>
<b>A111 2018/19</b>	<b>For the number of Subject Access requests received by the force to be circulated to the Committee.</b>	<b>DJ</b>	<b>Complete</b>
<b>A112 2018/19</b>	<b>TIAA to add priority level box to follow up Reviews to identify level of recommendations, which are outstanding.</b>	<b>TIAA</b>	<b>Complete</b>

MM welcomed everyone to the meeting.

Apologies were given on behalf of the WAO.

CC will be attending the meeting late due to other commitments.

#### **A119 2018/19: Election of Panel Chair.**

CoS explained that as per the JAC ToR it is time to elect a Committee Chair. AM proposed MM to continue as Chair. All members agreed with this proposal. MM confirmed that he is happy to continue as Chair.

#### **Decision 119 2018/19: MM re-elected as JAC Chair.**

## **A120 2018/19: Minutes of the meeting held on 30<sup>th</sup> July 2019 and Matters Arising**

HC noted that there is a typo on page 3 of the minutes where JM is referred to as JB. Under A86.

**Action A120: CB to amend the typo on page 3 under A86 where JM is referred to as JB.**

AM noted that there is a typo on page 13 where breeches is noted instead of breaches.

**Action A120: CB to amend the typo on page 13 as recorded within the minutes.**

**Action 120: CB to amend A108 to Draft Annual Statement of Accounts for 2018/19 instead of 2017/18.**

The actions from the previous meeting were discussed. The majority of which have been completed as detailed in the action table.

CoS gave an update in relation to A97 and explained that she is due to attend a meeting later that day to discuss the future of the trust with the trustees and to decide whether it will continue. An update in relation to this will be provided at the next meeting.

CoS explained that the JAC ToR has been amended as per discussions from the last meeting and has now been published on the PCC's website.

CoS gave an update in relation to A107 and the Counter-Fraud and Anti-Corruption Policy. This Policy is currently in draft and work is ongoing with both the Force and OPCC. A draft will hopefully be brought to the next Committee meeting for Members consideration.

HC gave an update in relation to A109: TIAA to provide feedback at the next meeting on how the principles as set out in the CIPFA Statement Role of Head of Internal Audit document apply to TIAA as an organisation. HC explained that TIAA have an independent consultant who looks at their compliance with CIPFA requirements and key principles. They have found that no changes are needed to their current procedures and practices, as they are already designed to reflect public sector standards which encompasses the CIPFA requirements. HC explained that they are unable to undertake an independent review for each client as they have over 350 clients; as such one review is undertaken looking at a cross section of organisations. This review is available for all organisations to see. An independent review can be undertaken just for DPP, however this will be done at an extra

cost. ME asked whether Dyfed-Powys was one of the organisations included in the most recent review. HC stated that she would be able to find this information and report back to the Committee.

**Action A120: HC to confirm whether Dyfed-Powys Police was one of the organisations included in their most recent TIAA independent review.**

MM queried whether they would be able to ask to be included as one of the organisations in the next independent review if the Committee felt it was required. HC confirmed that this request could be passed on to the organisation if desired. HC also shared that Gwent Police have recently undertaken a review of TIAA compliance and that these findings could be shared. The Panel agreed that it would be useful to have sight of the Gwent review as a fellow Welsh Force.

**Action 120: HC to share the Gwent TIAA compliance review and the TIAA independent review with the Committee.**

HC confirmed that A112- for TIAA to add priority level box to follow up Reviews to identify level of recommendations, which are outstanding. This will be included in the next finalised interim review.

CoS explained that in relation drawing up the Internal Audit Plan and the role of the Audit and Quality Assurance Group meeting in engaging with a number of managers to determine what areas are of concern to them. It was explained that an action which came from that meeting was that a matrix is created to show members how audits can be prioritised. There were a number of areas identified for audit, but work is ongoing in terms of systematically prioritising areas for review. IW also added that they were bringing this to the attention of the Audit and Quality Assurance Group during the current audit year, meaning that the majority of audits had been prescribed, with an audit programme already in place with limited scope. This process of involving the Audit and Quality Group will be most effective when drawing up the next Internal Audit Plan for the upcoming year.

KC queried whether an update in relation to the ICT infrastructure as recorded on page 8 of the minutes would be worthwhile, as it stated within the TIAA Assurance Review of ICT Infrastructure that they were working to a September and October implementation date.

**Action 120: ICT to provide an update at the next meeting in relation to the ICT infrastructure.**

**Decision A120: Pending discussed amendments the minutes of the meeting held on 30th July 2019 were accepted as a true record.**

**A121 2018/2019: The reports of the internal auditors:**

**a) Compliance Review of Overtime and Additional Allowances**

Outcome: Substantial Assurance with no recommendations. The review found that the organisation has effective controls in place for the processing of overtime and additional allowances. The Financial Control Procedures 3.7 - Payroll were found to be up to date.

DoF gave an update in relation to overtime and explained that this has been a focus for the Finance Gold Group. DoF explained that the ACC chairs the Finance Gold Group and as a result of work being driven from this group they have seen improvements in reporting and Management information, which has enabled them to look at data and identify any past and current trends. DoF explained that the authorisation level for overtime was changed last year. They have also built a contingency reserve for unforeseen major incidents. This year they have a 180K underspend on overtime compared to last year, however, it must be noted that they haven't had as many major incidents/ operations this year in comparison to the previous year. IW added that work is being undertaken to look at this area of overtime taking into account officer well-being and work demands, in order to try and address and eliminate overtime concerns.

AM noted that it is encouraging to hear about ongoing work in relation to overtime and it is positive to see that to date the Force is in a much better place in comparison to last year's spend. Key changes implemented have made a noticeable difference.

PCC noted that he is also involved in scrutiny work in relation to this. It was noted that when additional resources are given by the Government, they will help with some of the areas where overtime demand is high, which in return should see a reduction in the overtime requirement. This in addition to the ongoing work in looking at data and trends will hopefully help to minimise the need for reoccurring spends.

CFO explained that the Finance Gold Group recommendations were being successfully embedded into policies and the organisation and therefore the CC had decided to bring the

Group to an end. There has been review of the governance structures of the Force and one of the Boards has been renamed Finance, Efficiencies and Futures. This Board will continue with the work of the former Finance Gold Group. However, in addition, the both the Overtime and Medium Term Financial Plan Sub Groups would continue along with a widened terms of reference for the Strategic Finance and Procurement Group.

### **b) HR Management – Recruitment and Training**

Outcome: Reasonable Assurance with one priority one recommendation: That a procedure be established for the routine analysis of the quality and areas for improvement of internal and external training courses. They found that the Force uses a generic feedback form for evaluating training courses, however, there is no assessment of the quality of courses being delivered, in order to provide a basis for a 'lessons learned' exercise to inform future development and ensure value for money.

ME queried in relation to the comment included within the overall inclusion box – “The Force is in the process of enhancing the reporting on recruitment to the governance forums.” ME noted that there is no reference in narrative as to what processes are in place to enhance the reporting on recruitment to the governance forums and whether there are any timeframes etc. HC explained that this is referenced under section 11.5 of the report, however, is happy to update the Committee with further information on the processes that are in place in relation to this conclusion.

**Action 121: HC to update the Committee with further information on processes in place in response to their review relating to the reporting of recruitment to the governance forums.**

AM queried whether TIAA were content with the Forces response to the priority 2 recommendation – “Using force systems we will scope the potential to automate the initial feedback questionnaires to release staff to undertake analysis of the training quality.” HC explained that work does need to be done in relation to collating and looking at the feedback.

The Committee felt that it would be useful to receive some further information on this in the future in terms of how collating the feedback on training courses can be managed.

**Action 121: Further information to be given to the Committee in relation to how feedback from courses can be collated in order to help evaluate their value.**

IW raised a point in relation to the transfer from internal Itrent systems to the all Wales system and whether the Committee felt it would be beneficial to look at the value for money aspects in this change. DoF confirmed that a report has been submitted on these changes and significant savings were identified. IW queried whether it would be beneficial for the Value for Money query to become a standing question in all TIAA reviews. MM suggested that this request be taken to the Audit and Quality Assurance Group as this would fit into their discussions and agenda.

**Action 121: For the request for Value for Money to become a standing question within all TIAA reports to be taken to the Audit and Quality Assurance Group**

HC also wished to note that as part of all reviews they do consider ways in which systems and procedures can be improved increasing efficiencies, incorporating Value for Money and cost savings. HC will also ask that Value for Money is flagged up and considered for each review as a reminder.

**A122 2018/19: To consider the 2019/20 progress report of the Internal Auditors (SICA)**

HC explained that this report provides the Audit Committee with an update on the progress of their work up to the 7<sup>th</sup> October 2019. HC explained that page 4 shows a summary of all the reviews planned for the year and the reviews that have been completed. There are two reports currently in draft and there are a number of reports currently ongoing.

HC explained that there are still a number of scopes still waiting to be issued. TIAA met with all area lead individuals at the start of the year to discuss the audits and their expectations. Work is currently being undertaken in accordance with the plan, with 13 contingency days still available should further additional work be required.

CoS noted that one of the points which was raised at the Corporate Governance meeting was that there is no planned reviews in relation to Commissioned Services and whether it may be worth utilising some of the contingency days in reviewing this area, especially as they will be looking at re-commissioning a number of services over the next year.



**Action 122: CoS to liaise with TIAA to discuss the possibility in including a review in relation to Commissioned Services in their revised audit plan.**

**A123 2018/19: To receive a Treasury Management report – performance during 2018/19 and mid-year review of performance during 2019/20**

CFO explained that this report reflects on performance in 2018/19, in addition to a mid-year report of performance to date in 2019/20. CFO noted that our comparative positions are positive, with the team working closely with Arlingclose. A presentation will also be given from Arlingclose at the December finance seminar. CFO stated that they are currently reviewing their Capital Programme in preparation for the Medium Term Financial Plan and precept work with there being an extra Finance, Efficiencies and Future Group meeting with a focus on Capital, looking at a possibility of having a ten year capital programme. Some concerns have been raised since the report due to the Treasury announcement of a 1% increase in PWLB borrowing. This has raised a concern amongst Public Sector organisations who have Capital Programmes reliant on borrowing. As a result of this, the organisation's Capital Programme will need to be reviewed taking advice from Arlingclose on how best to accommodate this change. CFO also noted that as documented within the report there is a shortfall in investment income this year. The Medium Term Financial Plan and Capital Programme does include some borrowing assumptions and there have been some slippage in terms of two of the major schemes. These include the Joint Firearms Unit. However from recent meetings with South Wales Police it is likely that this contribution will be more in the region of £8 million. This increase will need to be factored into the review of the Capital Programme.

AM wished to compliment the report and noted that it is positive to see within the graphs on pages 6 and 7 that they are meeting their performance measures. The Committee noted that under compliance one prudential indicator had been breached due to the CFR being repaid.

KC queried how long Arlingclose had been the financial advisors for Dyfed-Powys. A discussion took place regarding Arlingclose being the financial advisors for over 6 years and the Committee were in agreement that their input and presentations at past meetings have been very beneficial and informative. KC and AK queried whether it would be worth

looking at options in the future when the contract is up for renewal to ensure that Value for Money is being considered. CFO agreed that options will be considered when contracts are next up for renewal.

**Action 123: CFO to confirm when the contract for Arlingclose is up for renewal.**

The CC is welcomed to the meeting.

### **A124 2018/19: Draft Collaboration VFM Conclusion Briefing**

The Police Reform and Social Responsibility Act 2011 has placed new duties on Commissioners and Chief Officers to collaborate where it is in the interests of effectiveness of their own and other Police Force areas. CFO explained that they have had some concerns as noted in the strategic risk register in relation to financial management and governance of collaboration. CFO explained that they have been in discussion with the WAO and it has been suggested that it may be worth picking this up as part of a collaborative piece of work. CFO explained that this briefing has been discussed at the All Wales Policing Group.

PCC expressed that he felt that the collaboration arrangements needed a greater level of scrutiny. Collaborative arrangements are operational, but in terms of governance and financial management, PCCs do play a part in holding Chief Officers to account in relation to this activity.

A discussion took place in relation to how the review will be progressed.

The Committee agreed that it would be useful to receive an update on the progress made in relation to the programme at the next meeting.

**Action A124: WAO to provide an update to the Committee at the next meeting in relation to progress made with regards to the collaboration VFM conclusion briefing.**

**A125 2018/19: To consider the draft Dyfed-Powys Audit Committee self-assessment**

MM explained that this self – assessment of Dyfed-Powys Joint Audit Committee has come as a result from a request at the last joint training day. CoS explained that herself, MM and DoF met to pull together this first draft and wished to bring to the Committees attention prior to finalising and submitting to North Wales OPCC for collation and review.

KC raised a point in relation to the section referencing the members’ composition and backgrounds in terms of incorporating a mix of skills and knowledge – no reference is made to diversity. It was felt that it would be useful to note that recruiting diversely is a known challenge in Dyfed-Powys. The Committee agreed that this was a valid point to include and any further recommendations would be welcome on how they can try and ensure when recruiting that they are being representative of communities.

**Action 125: CoS to add a reference to diversity in the section referring to Members composition and skills within the Dyfed-Powys JAC self-assessment.**

MM noted that it is the aim that they will be able to use this self-assessment as a framework to monitor their achievements and processes.

CoS asked that members provide her with any further amendments by the end of the week.

### **A126 2018/2019: Force significant Corporate Risks**

MM welcomed HM to the meeting.

HM gave an update in relation to the Force reviewing its risk appetite in relation to information management risks. This stems from a visit from the Information Commissioners Office(ICO) auditors at the beginning of the year where they identified an area for improvement for the organisation to have a separate information risk register. This was accepted and a proposal was taken before the Information and Assurance Board to introduce a new risk register to the organisation, which contains the information risks only. This will allow the organisation to focus on information risks in a more robust way.

HM explained that there has been one new area of risk within the Corporate Risk register since their last meeting, regarding the potential loss of forensic HO pathology capability within Wales. In September 2019, the University of Wales indicated an intention to

withdraw their funding and service from the summer of 2020 which will have significant operational implications. Chief Constable of South Wales is leading on the response and they are in communication with the University to see how this issue may be overcome.

HM explained that in terms of improved areas of risk, Eurofins Forensics Services has been granted approval to return to business as usual status. This area of risk will be presented to the Gold Operations Board later this month for discharge off the risk register.

The second area of improvement is in relation to non-compliance with statutory requirements to undertake Health & Safety Inspections; this area of risk was raised on 27/04/18 in response to inconsistent performance in the deployment of IOSH (Institution of Occupational Safety and Health) trained staff to undertake H & S inspections and fire drills at police premises. HM explained that by placing this risk on the register it has brought a focus for deployment to undertake H&S inspections and in finding additional resources where there were difficulties in achieving this. The Force has seen a significant improvement in compliance, with fire drills and inspections showing 98% compliance across the Force (except Custody Suites). This figure compares with a position of 53% for 2017 and 69% for 2018. Further work needs to be done in custody suites. The area of risk is recognised as considerably improved, but will be retained on the risk register until further consideration can be given at the Force Health and Safety Group in December.

HM gave an update in relation to existing risks, including Brexit. There is still uncertainties with this area of risk. There has recently been activity with the Home Office raising a number of questions about emergency services and business continuity plans.

HM gave an update in relation to a company who had their accreditation removed as it was identified that they had used some non-vetted staff on cases that were submitted by Dyfed-Powys Police. This risk has now been discharged with all individuals having received vetting clearance and the company's accreditation being restored.

MM thanked HM for attending and for his contribution to the meeting.

### **A127 2018/2019: Corporate Governance Group Actions – 3<sup>rd</sup> October 2019**

The Committee looked at the actions raised within the last Corporate Governance Group meeting.

MM wished to reiterate CoS point in relation to the contingency days that are available with TIAA and the possibility of a further review being undertaken of the PCC's Office in relation to Commissioned Services. CoS stated that they will be looking at the Commissioning Strategy over the next 18 months, with a number of services looking to be re-commissioned, utilising some of the additional days that TIAA have available to carry out some work in this area would be beneficial.

### **A128 2018/2019: receive actions of Audit and Quality Assurance Group meeting held 30th September 2019**

The Committee looked at the actions raised within the last Audit and Quality Assurance Group meeting. This is the first time for the actions to be brought to JAC.

CoS explained that one of the key elements of the meeting is to ensure that there is improved co-ordination of audit activity within the Organisation in order to understand the impact of the audit activity and to ensure learning is taken from them. Work has been carried out by the DCC in terms of governance structures which will help facilitate these improvements. Another element which will be discussed and monitored within the group is the concerns previously raised by the Committee in relation to the timeliness of the forces' response to audit reviews. Rationale for delays will be looked at and ways in which these can be mitigated will be explored to progress recommendations in a timely manner.

AM noted that there were a high number of apologies at the last meeting. CoS stated that due to operational demands and attendees being operational officers, attendance was impacted. CoS did reassure that Committee that once the new governance structures have been implemented the attendee list will be reviewed to ensure that key individuals are in attendance in order cascade key information.

### **A129 2018/2019: Members Updates**

MM explained that this is a new addition to JAC agendas in order to allow Committee members to share any relevant information or key activities that they have been involved in in relation to the work of the PCC and CC with the rest of the group.

MM noted that he had attended the PCCs CCTV event and that he was impressed with the quality of the CCTV facilities. MM wished to express his thanks to the PCC for the invite to the event and the insight into this valuable area of work.

A discussion took place in relation to the success of CCTV in terms of both a prevention mechanism and in terms of the positive feedback that has been received from communities that they feel safer when out and about in their local communities.

MM stated that he also attends the HMIC Governance Group meetings which looks at recommendations coming out of the HMICFRS reports. MM will be able to keep the Committee updated in terms of any key elements which arise from these meetings.

### **A130 2018/2019: Annual JAC training day update**

Arrangements are now in place for the annual JAC training day which will be held in Wrexham in April. CB will re-circulate the invites in order to confirm attendees.

**Action A130: CB to re-circulate the information in relation to the Annual JAC training day.**

### **A131 2018/2019: Data Protection Update**

MM explained that this information has been brought to the Committees' attention in order to monitor any areas of concerns or risks. ME noted that there has been a 13% growth in terms of data breaches, is this due to increased knowledge in recording breaches etc.

CC stated that he felt that this growth was due to a better understanding of data protection and the need to report and record. Positively they have seen an increase in individuals bringing data breaches to the forces attention. CoS noted that it is encouraging to see a culture of learning that if a mistake is made, individuals are confident in reporting and ensuring that learning is taken going forward to avoid repeat mistakes.

### **A132 2018/2019: Any Other Business**

No further business to be discussed. MM thanked everyone for attending the meeting.

**The Meeting closed at 12:07 hrs**

<b>DECISIONS ARISING FROM MEETING 15<sup>th</sup> October 2019</b>		
<b>Decision No.</b>	<b>Decision Summary</b>	
<b>A119 2018/19</b>	<b>MM to be re-elected as JAC Chair.</b>	<b>Completed</b>
<b>A120 2018/19</b>	<b>Pending discussed amendments the minutes of the meeting held on 30th July 2019 were accepted as a true record.</b>	<b>Completed</b>

<b>ACTIONS ARISING FROM MEETING 15<sup>th</sup> October 2019</b>		
<b>Action N<sup>o</sup></b>	<b>Action Summary</b>	<b>To be progressed by</b>
<b>A120 2018/19</b>	<b>CB to amend the typo on page 3 under A86 where JM is referred to as JB.</b>	<b>CB</b>
<b>A120 2018/19</b>	<b>CB to amend the typo on page 13 as recorded within the minutes.</b>	<b>CB</b>
<b>A120 2018/19</b>	<b>HC to confirm whether Dyfed-Powys Police was one of the organisations included in their most recent TIAA independent review.</b>	<b>TIAA</b>
<b>A120 2018/19</b>	<b>HC to share the Gwent TIAA compliance review and the TIAA independent review with the Committee.</b>	<b>TIAA</b>
<b>A120 2018/19</b>	<b>CB to amend A108 to Draft Annual Statement of Accounts for 2018/19 instead of 2017/18.</b>	<b>CB</b>
<b>A120 2018/19</b>	<b>ICT to provide an update at the next meeting in relation to the ICT infrastructure.</b>	<b>ICT</b>
<b>A121 2018/19</b>	<b>HC to update the Committee with further information on processes in place in response to their review relating to the reporting of recruitment to the governance forums.</b>	<b>TIAA</b>
<b>A121 2018/19</b>	<b>Further information to be given to the Committee in relation to how feedback from courses can be collated in order to help evaluate their value.</b>	<b>Force</b>
<b>A121 2018/19</b>	<b>For the request for Value for Money to become a standing question within all TIAA reports to be taken to the Audit and Quality Assurance Group.</b>	<b>IW</b>

<b>A122 2018/19</b>	<b>CoS to liaise with TIAA to discuss the possibility in including a review in relation to Commissioned Services in their revised audit plan.</b>	<b>CoS</b>
<b>A123 2018/19</b>	<b>CFO to confirm when the contract for Arlingclose is up for renewal.</b>	<b>CFO</b>
<b>A124 2018/19</b>	<b>WAO to provide an update to the Committee at the next meeting in relation to progress made with regards to the collaboration VFM conclusion briefing.</b>	<b>WAO</b>
<b>A125 2018/19</b>	<b>CoS to add a reference to diversity in the section referring to Members composition and skills within the Dyfed-Powys JAC self-assessment.</b>	<b>CoS</b>
<b>A130 2018/19</b>	<b>CB to re-circulate the information in relation to the Annual JAC training day.</b>	<b>CB</b>

<b>ONGOING ACTIONS SUMMARY FROM PREVIOUS MEETINGS</b>		
<b>Action N°</b>	<b>Action Summary</b>	<b>To be progressed by</b>
<b>A97 2017/18</b>	<b>CoS to consider where the trust legally sits in terms of its link with the OPCC.</b>	<b>OPCC</b>