

## Board Paper

### Date

30 May 2023

### Title

Corporate plan, business plan and budget 23/24

### Report Author

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### Responsible Executive Director

Richard Greenhous, Chief of Staff

### Paper for decision

### Open in part

## Issue

1. The OEP must publish a corporate plan for the 3 year period ahead. The business plan and associated budget to support this is presented to the Board for approval.

## Recommendation

2. The Board is recommended to agree the business plan, and budget for 2023/24.
3. The Board is recommended to consider and comment on the corporate plan, and to delegate approval of its final form to the Chief Executive in consultation with the Chair.

## Background

### Priorities for the Corporate and Business Plans

4. At its meeting on 16 March, the Board considered an outline of a proposed business plan for 2023/24. Specifically, it considered both the thematic issues proposed to be prioritised, and the key prioritisation choices required in directorate business plans. These thematic priorities included an intended focus in 2023/24 on work:
  - a. to improve nature

- b. to support clean water
  - c. to support effective environmental governance
5. We also outlined draft plans to develop our capability by:
- a. Developing our ability to map the trajectory of environmental progress, and thereby have better foresight.
  - b. Developing our approach to monitoring the implementation of environmental law, so we can better identify opportunities and priority issues on which we should focus through all our functions.
  - c. Increasing the volume of our investigatory activities to *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs* each year that the Board identified as its aspiration in October, along with a broader range of investigative and pre-investigative action.
  - d. Developing and building the resilience of our corporate and enabling functions.
6. We also set out emerging priorities for the latter years of our three year plan. We outlined a series of in year activities which were proposed in order to build the evidence from which we can act purposefully and wisely in later years. These were in the issues of waste management, air quality, soil health and improving nature at sea.
7. In addition, the Board considered those issues and activities which were not prioritised. The Board endorsed the Executive's prioritisation overall, making some suggestions in specific areas. The Board queried whether more resources should be available for consultation responses and advice. It questioned whether a higher priority could be afforded to responding to any land-use framework consultation, and the extent of our work in the marine environment. It indicated it was less persuaded by the opportunity to influence improvements in air quality strategy and targets, following recent government announcements, and the logic of a focus on environmental land management. It sought assurance in general that there was sufficient responsiveness in the plan for shorter, tactical work, alongside the large thematic programmes which take time to complete.
8. At its strategy day on 18 May, the Board considered the work proposed to be undertaken in Northern Ireland. It recognised the constraints provided by the funding available to support our Northern Ireland functions, including as a result of the extent of in-flight activity carried into this business year – notably *this section has been redacted as it relates to information recorded for the purposes of OEP's functions relating to investigations and enforcement* and thematic environmental law reports into the water framework directives, and the management of protected sites. It saw the benefits of a public facing product relating to our work on the Northern Ireland environmental improvement plan, and encouraged this to be developed. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs*, it saw the benefit of a general review of enforcement in Northern Ireland.

#### Managing financial and delivery risks

9. On 16 March, the Board's steer was sought on how to manage risks to delivery and underspend in year, in light of the financial outturn in 2022/23. The Board agreed with the

Executive's recommendation that we should start the year with a forecast overspend (or over-programme) *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* This was to mitigate risks of underspend which would otherwise risk losing the confidence of Defra and DAERA, limit the impact we can have and be unacceptable to the Executive and the Board.

10. To further mitigate underspend risks and enable delivery to begin at pace, the Board agreed interim delegations to Executive Directors ahead of the business plan being agreed. This was to allow procurement that had been identified as 'must' do or 'really should' do where there was an identified need to progress early. The Board also noted that recruitment would begin to fill posts expected to be necessary to deliver the plan. Each has progressed swiftly, as reported separately in the report of the Chief Executive.

## Analysis

11. A draft corporate plan is presented for the Board to consider at Annex A.
12. Annex B shows a further breakdown of the plan to indicate the resources applied to each commitment of the corporate plan, and the deliverables or outputs that will be created. Key projects aligned to each commitment are also shown.
13. Annex C extracts those elements of the plan which relate to Northern Ireland, and shows which are proposed to be committed now, which have started but to be reviewed if no further funding is available, and which will only start if more resources are provided. This is in line with the information presented to the Board strategy day, reformatted to show alignment to the corporate plan and to indicate the deliverables attaching to each.

### Proposed content of the business and corporate plan

14. The corporate plan (and aligned business plan) proposed intends us to use each of our functions in England and Northern Ireland, and therefore our full range of outputs and activities. In doing so, there is an emphasis of our work in each of our strategic objectives on activity to improve nature, support clean water, and support effective environmental governance. This is as the Board steered.
15. Under our objective for sustained environmental improvement, the corporate plan sets out the work we intend so that government is held to account for the delivery of its plans for environmental improvement. Key aspects include:
  - a. Our annual EIP monitoring report in England (commitment 1.i) with its focus this year on the EIP's apex goal of thriving plants and wildlife as the Board considered and agreed in its meeting of 20 April (commitment 1.ii)
  - b. Our work to monitor environmental improvement in Northern Ireland (commitment 1.ii). The public facing corporate plan is drafted to provide discretion on the nature of any publication that we might prepare, so that the Board can consider proposals when developed as discussed at its strategy day.
  - c. Strategic research and evidence gathering into the condition of the marine environment in England and Northern Ireland (commitment 1.v), and the contribution of environmental land management schemes in England to EIP goals and targets

(commitment 1.ix). Research into the best approaches to assessing the trajectory of environmental improvement towards long-term targets in England (commitment 1.iv) in line with the science and evidence strategy the Board considered and agreed in its meeting of 20 April. These will have internal and possibly external outputs in this or future years. The main purpose is to underpin future scrutiny, and to support our prioritisation in future years.

16. The focus of the activity to scrutinise the land management schemes is to assess and map their contribution to delivering EIP goals and long-term targets, as one of the key drivers and enablers of progress. It is not scrutiny of the implementation of the ELMS. For this reason, the Executive continues to judge this as important underpinning work this year.
17. Our work on this objective is forecast to require around 16% of our staff time, and 20% of our non-pay expenditure, based on the assumptions we set out in our plan.
18. Our work to support better environmental law, which is better implemented is expected to consume 22% of our time, and 16% of our non-pay expenditure. Key features of this programme include:
  - a. Four reports to Parliament, and three to the Northern Ireland Assembly, on the effective implementation of environmental law relating to environmental assessment regimes (England only – commitment 2.iv), the designation and management of sites for nature (commitment 2.vi), inland water quality (commitment 2.x) and bathing waters (commitment 2.xi). The scope and intent of each of these reports has been considered by the Board during 2022/23, and interim updates on progress provided. Each of these is ‘in-flight’ from last year; we have publicly committed to each. We will not however, publish a report in Northern Ireland on environmental assessment regimes, as one way to balance our resource constraint.
  - b. Continuing scrutiny of environmental principles, and the implementation of the Retained EU Law (Revocation and Reform) Bill (commitments 2.vii, and 2.viii) and our strategic intervention into the case of *Finch v Surrey County Council* (2.v).
19. We expect to use 25% of our time, and 10% of our non-pay resources to pursue improved compliance with environmental law by the public authorities we oversee. This includes:
  - a. Progressing our first investigations in England and Northern Ireland (commitments 3.iv and 3.v).
  - b. Capacity to allow a further two significant investigations to be initiated in year *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs*.
20. As in 22/23, we expect our work to support us to have the authority, relationships, expertise and voice to fulfil our role to consume the most resources of our four objectives. This reflects in part the overhead of independent corporate and communications functions embedded in the organisational design, and in part the continued build of the organisation to resilience, and efficiency, and in part how we allocate costs such as the Board’s own costs. We expect 37% of our time, and 54% of our revenue expenditure (and our capital) to support this objective. Around a quarter of this time, all the capital and an eighth of the revenue expenditure relates to activity to build the organisation. Key activities include:

- a. Improving our website and use of digital communications (commitment 4.ix), fully embedding our stakeholder management approach and the depth of our engagement in Northern Ireland, with Parliament and across government (commitment 4.viii)
- b. Undertaking the necessary work to move into our Worcester office (commitment 4.x)
- c. Development of our IT infrastructure to enable management of information, data and intelligence, and more efficient procurement (commitment 4.xii).

#### Key prioritisation choices since the Board's last discussion

21. There have been significant and challenging prioritisation choices since the Board's last review of the outline proposals, to ensure that the plan overall remains within the intended affordability parameters agreed by the Board. In respect of Northern Ireland, the Board discussed these choices, and notably the reduction in the scale and scope of the evidence and research programme in Northern Ireland, at its strategy day, as set out further below.
22. Choices have equally been required in England, although not to the same extent. Key among these has been:
  - a. Deprioritisation of any further work to support air quality research in England and Northern Ireland, reflecting the Board's last discussion of the opportunity to influence further improvements in the targets and strategy for air quality now a refreshed air quality strategy has been agreed.
  - b. A reduction in scope and scale of the scrutiny of the Retained EU Law (Revocation and Reform) Bill, and work to scrutinise adherence to deadlines in environmental law. This reflects in part changes to the REUL bill in that period, and lower risk of wholesale reform of environmental laws through this mechanism in 2023.
  - c. Spreading more of the cost of our new work planned to scrutinise the implementation of compliance monitoring regimes (which will be considered by the Board in line with our normal practice for mobilising significant projects in due course) across the year-end and into 2024/25.
  - d. A reduction in the resourcing applied to some of our corporate service activity, notably to limit the contingency for resourcing resilience across the corporate services team. This is an affordability decision alone.
  - e. Removing contingency and flexibility of our evidence gathering activities outside of the planned work programme. Contingency is now only by stopping or slowing down activity to create capacity – we are not holding back funds to allow further evidence commissions as they emerge in year.
  - f. A continued limitation in the resources held for advisory activity and consultation responses outside of our main work programmes. This reflects both the overall prioritisation of resources, and the Executive's view of the efficacy and efficiency through which we can deliver value enhancing work outside of the evidence base we establish in our broader, longer-term, work

23. These choices reflect our prioritisation approach – to focus on the opportunities to make the most difference – and intend to reflect the recent steers of the Board.

#### Our proposed plan in Northern Ireland

24. The Board discussed the draft planned activities in Northern Ireland at its strategy day, in the context of an imminent bid for additional resources. That proposition, as amended, is now presented for agreement.
25. In its May discussions, and in its March meeting, the Board noted that there is a range of costs for which DAERA's funding must bear its fair proportion to ensure that there is no cross subsidy between our funding from England and Northern Ireland. To allocate this most equitably between England and Northern Ireland, we calculate the 'true cost' of each project to be allocated to Northern Ireland.<sup>1</sup>
26. Annex C breaks down our proposed plan in Northern Ireland, based on this 'true cost', and shows how we propose to use our £1m of resources. As the Board considered in May, to manage the significant challenge in balancing our plan with our Northern Ireland resources, we propose to allocate projects into three categories:
- a. First, those costs which are committed now. This includes corporate projects for which Northern Ireland must bear its share of the cost, the cost of a range of duties we must fulfil, and other work which is committed once begun – this may be for operational reasons (e.g. where a research contract is let), or where we must pursue a project to its conclusion, as is the case with an investigation. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs and as its publication would be prejudicial to relations within the United Kingdom.*
  - b. Second, those projects where we propose to begin work at risk, and stop, or slow down if further funding is not forthcoming from DAERA in our resource bid. The Board discussed the judgements the accounting officer has made in this regard at its strategy day. The proposal aims to ensure we maximise our opportunity to make a difference to the environment in Northern Ireland, but have a realistic approach to live within our means if we must. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs and as its publication would be prejudicial to relations within the United Kingdom.*
  - c. Third, projects which will only start if further funding is provided. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

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<sup>1</sup> *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

27. As the Board debated in May, there may be choices still to be made depending on the success of the bid for resources we make, including for which projects to stop or not initiate. These will be considered by the Board in due course. We therefore cannot be certain of the outputs and impact our plan in Northern Ireland may have. If fully funded, however, the plan has the potential for us to use each of our statutory functions, interacting with departments of the Northern Ireland government, and the Executive and Assembly if they form. Key outputs include to:
- a. Provide a service to those which wish to complain that a public authority has failed to comply with environmental law
  - b. Progress our first investigation in Northern Ireland, *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*
  - c. Lay up to three environmental law reports in Northern Ireland relating to inland water quality, bathing waters and the designation and management of protected sites
  - d. Monitor environmental progress in Northern Ireland, including through gathering evidence in respect of the management of waste, status of species and condition of the marine environment, and provide a public output to this work, to be defined
  - e. Provide advice in respect of an environmental principles policy statement for Northern Ireland (which we must if requested, as we expect to be), and on any implications of the Retained EU law (Revocation and Reform) bill if risks and opportunities emerge which we decide it a priority to advise on.
  - f. Monitor certain deadlines in environmental law, including in respect of the adopting of an EIP for Northern Ireland.
  - g. Expand our stakeholder engagement activity and maintain our touchdown office space in Belfast.
28. In developing this plan, and reflecting the key steers provided by the Board in May, we have:
- a. Preserved discretion on the public output of our scrutiny of environmental progress, to allow the Board to consider and decide the right approach as a proposition is developed.
  - b. Indicated that our 'compliance monitoring' review may extend to Northern Ireland (originally England only), as it is scoped and finalised – the Board's discussion on enforcement review will be taken into account in this regard. Given affordability constraint, this may be a programme that would begin in Northern Ireland in subsequent years.
  - c. Researched and scoped areas of potential interest for us relating to the NI Climate Change Act, and the Northern Ireland grassland economy. We intend to bring these for discussion with the Board, to inform our longer-term priorities, in the coming months.

Affordability and deliverability of the proposed plan

29. The plan sits within the parameters the Board steered in its last discussion, namely that we should match our expected staff capacity to our expected demand for staff resources, *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*
30. We anticipate that the plan proposed requires 74.5 full time equivalent capacity over the year, including the executive team and Chief Executive. Our recruitment plan forecasts that we will have 74.8 FTE of capacity in the year ahead, if we succeed in recruiting at the pace that we plan. To generate that capacity, our headcount will grow to peak at around 81 FTE in October, as we recruit to new posts and retain existing temporary resources, before reducing within our headcount cap of c74 posts by year-end. There are risks to this recruitment plan, given its scale – we aim to recruit to 27 posts, around a third of our current size.
31. The affordability is at the upper limit of the range last discussed with the Board, *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.* There is inevitably risk in constructing a plan which predicts an overspend at the start of the year. We anticipate that this overspend will reduce in year by:
- a. Recruitment outcomes – either because of later than expected start dates, or the impact of internal appointments to new posts. Our recruitment plan is ambitious.
  - b. Turnover and leavers in year creating underspend. Though our turnover to date has been low, our first appointees will pass two years in post during this financial year.
  - c. The ability to secure additional resources through:
    - i. In year resource bids to Defra or DAERA
      1. As part of Defra’s planning to mitigate any underspend that may emerge in its finances, we have notified Defra of our current forecast overspend for England (*this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs*). We also set out a range of additional projects we may be able to mobilise rapidly in year, if the opportunity for additional funding from Defra’s underspend arises.
      2. By the time the Board meets, we will have notified DAERA of the additional resources we seek in year, as a preliminary step in the process to bid for additional resources. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*
    - ii. Switching our *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs* forecast underspend on RDEL depreciation to RDEL admin budgets, later in the year.
  - d. Forecast non-pay expenditure being lower than predicted. We have historically both overestimated the costs of non-pay items, and the pace at which we can procure and



spend. Whilst our capacity to procure is much improved, we continue to judge some reduction to forecast to be possible or probable.

- e. Changing the plan in England in flight by deferring expenditure (including potentially recruitment) into later years, deprioritising, stopping or not starting work planned. This is similar to the approach set out for Northern Ireland, but choices less well developed given the different scale of challenge in each jurisdiction.

- 32. We have an active, and agile approach to prioritisation and redeployment of resourcing in year. We judge that we can deliver e. above if necessary. However, prioritisation choices in year must reflect both the absolute priority we would choose, and our practical ability to stop or slow down – not all choices will be available, for example if resources are committed to a procurement contract.
- 33. The Board has delegated variations to the business plan of this nature in year to the Chief Executive, with notification to the Board. The Board will continue to be kept up to date on progress in managing the underspend and revisions to plan which may be required.

### Budget

- 34. The business plan has provided the evidence to set our baseline budget. The below figures encompass our work in England and Northern Ireland, and therefore our funding from each of Defra and DAERA.

*This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

- 35. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

- 36. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

- 37. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

- 38. In order to delegate budget to the four executive directors, reductions must be made to the total sums forecast so that the delegated budget balances with the delegation the Chief Executive has received. There are choices in how these reductions can most equitably be made. We propose the following delegations, which balance the reduction for each cost centre with the available total budget, that available for non-pay, and take account of the discretion in non-pay expenditures.

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- 39. This applies the 'stretch' for each Executive Director, relative to their opening forecast, in this way:

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40. Pay budgets are allocated to each Executive Director assuming a pay *this section has been redacted as its publication would be prejudicial to the effective conduct of public affairs*. This assumes that we mirror Defra's understood intention to make full use of the discretion in its pay remit – the Board will make a decision in this regard, in due course. The Board and Chief Executive pay costs are in the Chief of Staff cost centre, inflating this pay budget relative to others.

### Format of the corporate plan

41. The draft corporate plan is intended as the public articulation of this plan and allocation of resources. It is the plan against which we must report in our annual report and accounts, and to which Defra and DAERA will seek to hold us accountable.
42. The draft set out at Annex A mirrors the approach and tone of our 2022/23 plan and will be designed in a comparable way. We continue to set out work we will do each year, in the year ahead and to indicate work which may be undertaken in future years. As the Board considered and noted in its 16 March discussion, there is limited definition in the work we set out for future years.
43. Notable in the presentation is the way we have sought to indicate the uncertainty in a proportion of our work in Northern Ireland pending further budget confirmation. We highlight a range of work which may be at risk should further funds not be provided, but do not itemise the choices that we will make. This aims to balance transparency – by indicating the extent of risk – with the importance of retaining our independence and discretion, as we pursue further negotiations with DAERA.

## Finance and Resource

44. This paper sets out the financial implications of the business plan, the allocation of resources to our strategic objectives and directorates and between England and Northern Ireland in the analysis above.

## Impact Assessments

### Risk Assessment

45. *This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

### Equality Analysis

46. An [equalities impact assessment](#) has been completed on the business plan, and reviewed by the Chief of Staff. This indicates that our proposals have a neutral impact on people with protected characteristics. Having reviewed evidence from a range of sources, there is some weak indication that our proposals may have a very modest positive influence on those with protected characteristics which tend to be associated with lower socio-economic status – notably race. It is not recommended to make any adjustments to the proposed activities to take account of the equalities impact assessment undertaken.

47. We have [screened](#) the business plan in accordance with the relevant equalities legislation in Northern Ireland, using DAERA's policy. This has again been reviewed by the Chief of Staff. Similarly, no adjustment to the proposed activities is considered necessary to take account of the findings of the screening. While farmers are moderately more likely to be from protestant than catholic communities (56%/43% vs 37%/43% at a population level), our work does not directly impact on farmers or farming – any impact would be indirect through the decisions taken by others in light of our findings. Following screening, we judge the plan to be unlikely to have a significant or serious impact on any of the protected groups under the legislation and it is therefore deemed appropriate not to continue to a full equality impact assessment.

## Environmental Analysis

48. Our strategic intent is that the business and corporate plan maximise the impact we have against our principal objective in the next 3-5 years. We aim to prioritise those projects where we can make the most difference.
49. The OEP has a range of duties in environmental law. These duties have and will be considered in developing the approach, scope and content of specific projects where relevant. The business plan includes a project to create an OEP biodiversity policy and objectives, as required under the Natural Environment and Rural Communities Act 2006.

## Implementation Timescale

50. We plan to implement immediately, and publish the corporate plan in June.

## Communications

51. The Corporate Plan will be published on the OEP website and we will issue a press release and social media to promote it, although we do not anticipate it being of significant interest to the media or general audiences.
52. It is important that the Corporate Plan is well understood by OEP staff, including both the 'big picture' of what the organisation is seeking to achieve and the roles of teams and individuals in that. An all-staff event is planned for 21 June with the agenda and content designed to engage staff with the main themes and projects and take part in exercises to understand how their work contributes.
53. Communications activity will also seek to inform stakeholders about the work and priorities of the OEP as set out in the Corporate Plan. This will include those who may be directly involved or impacted by the work programme and those with an interest in the issues and who may wish to contribute through continued engagement and / or use our work to further their own efforts to protect and improve the environment. This will build on the engagement with external stakeholders undertaken in developing these proposals and as set out below. As part of this, there is an intention to use the Corporate Plan as a vehicle to reinstate some regular corporate level engagement with the NGO community, outside of specific work programmes.

## External Stakeholders

54. We have engaged with external stakeholders in a range of ways in developing the proposals in our business plan.
- a. In development of our 2022/23 corporate plan in Spring 2022, we held a series of stakeholder workshops with distinct stakeholder groups to hear their priorities for the OEP in our first year. We also undertook public research, to garner views from the public on their priorities for environmental protection, and the Board considered research Defra had commissioned of public priorities for the environment.
  - b. In autumn 2022, we held 2 well attended workshops – in London and Belfast – considering opportunities for environmental protection, and the particular role the OEP could play. The Board considered the output of this at its strategy day.
  - c. In December 2022, the Board considered research by Woodnewton Associates reporting stakeholder views of our impact, influence and how it might be improved.
  - d. Our individual projects have established stakeholder intelligence routes, which vary by project. Our potential follow-on work for water and nature, for example, has been informed by this intelligence.
  - e. In February we met with DAERA to understand its priorities, and query any particularly valued opportunities for the OEP to play its role.
  - f. In March and April we met with a range of stakeholders, to explain our emerging thinking on priorities, and outline the story of the corporate plan. While stakeholders argued for additions to our plan, which are recorded for future prioritisation, they endorsed the priorities we had chosen as inarguable. The outreach and transparency of our discussions was welcomed.
  - g. We have provided a copy of our draft corporate plan to Defra and DAERA to consider, before it is published. We must take account of any comments, but need not modify our plan on their account unless they suggest a conflict with our statutory role, or proper use of public funds. Comments are expected before the Board meets, but after this paper has been finalised and will be verbally reported.

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| Paper to be published  | Yes  |
| Publication date (if relevant)   | With meeting minutes, and after publication of the corporate plan.   |
| If it is proposed not to publish the paper or to not publish in full please outline the reasons why with reference to the exemptions | <p>Elements of the paper will be redacted for the following reasons:</p> <ul style="list-style-type: none"> <li>• publication would harm the administration/course of justice and the balance of public interest favours withholding disclosure (s.31 / reg 12(5)(b) EIR)</li> </ul> |

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| <p>available under the Freedom of Information Act (FOIA) or Environmental Information Regulations (EIR). Please include references to specific paragraphs in your paper</p> | <ul style="list-style-type: none"><li>• publication would harm the effective conduct of public affairs, including the Board's ability to receive candid advice and engage in free and frank discussion (s.36)</li></ul> |
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## ANNEXES LIST

*Annex A – This section has been redacted as it contains information for future publication.*

*Annex B – This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

*Annex C – This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs.*

