



Minutes

Meeting of the Board

Wednesday 26 and Thursday 27 November 2025

Stormont Hotel, Belfast and The Point, Belfast

Members

Malcolm Beatty OBE	Board Member
Professor Liz Fisher	Board Member
Richard Greenhous	Chief of Staff
Julie Hill MBE	Board Member
Professor Dan Laffoley	Board Member
Dr Paul Leinster CBE	Board Member
Caroline May	Board Member
Natalie Prosser	Chief Executive
Dame Glenys Stacey	Chair

OEP Attendees

Peter Ashford	General Counsel
REDACTED	Intelligence Officer (item 25.74)
REDACTED	Principal Complaints and Investigations Manager (item 25.68)
Nic Edwards	Head of Intelligence (item 25.70 and 25.74)
Mike Fox	Head of Communications and Strategic Relations
REDACTED	Principal Investigations Manager (item 25.69)
Angel Lai	Head of Finance and Corporate Services
Andy Lester	Head of Business Strategy and Planning
REDACTED	Principal Lawyer (item 25.69)
REDACTED	Principal MELA Officer (item 25.68)
Professor Robbie McDonald	Chief Insights Officer
REDACTED	Board Secretary and Private Office Manager
REDACTED	Principal Analyst (item 25.76)
Kate Tandy	Head of Litigation and Casework (item 25.68 and 25.69)
Helen Venn	Chief Regulatory Officer
REDACTED	Principal Lawyer (item 25.68)

Observers

David Lambert

Boardroom Apprentice

25.64 Apologies for Absence and Declarations of Interest

Apologies were received from Malcolm Beatty and Julie Hill. Caroline May and Paul Leinster were absent from item 25.71 to item 25.77.

There were no new declarations of interest.

25.65 Minutes and Matters Arising

The minutes from the 29 October meeting were agreed. The matters arising report was noted.

25.66 Report of the Chief Executive

The Board was informed of progress in concluding our report on progress against the EIP and targets, and the expected imminent conclusion and publication of a refreshed EIP in England, after conclusion of Government's review. We have been invited to an oral briefing on the EIP25 during the Board's time in Belfast. The Board was informed that we intend to make an early statement in relation to the refreshed EIP, but reserve our assessment to the publication of our progress report.

The Board was informed of the impact of the expected publication of the refreshed EIP on the timing of publication of our own report in relation to protected wildlife sites. The Board was shown and welcomed the infographic developed in light of the Board's steer at its last meeting.

Our work in relation to inspections in the waste and installations sector is continuing. There is active engagement with the Environment Agency in relation to its findings. We are working to ensure the report appropriately reflects ongoing work of the Agency to improve its regulation in this area, where new evidence is provided to us.

The Board reflected on its discussions with stakeholders in relation to the management of nutrients from agriculture in Northern Ireland. It noted that our report on the implementation of the Nutrient Action Programme Regulations is nearing conclusion, and would be considered further by the Board at its next meeting. This will be an important contribution in Northern Ireland.

The independent panel on environmental governance had issued its report, which made reference to the OEP and our evidence. The Board will meet with the panel during its time in Northern Ireland.

The Board noted the update provided in relation to our investigation into Special Protected Areas for wild birds. It noted that the investigation report in relation to Farming Rules for Water had been published, and this had allowed a focus on the outcomes of this investigation.

This section has been redacted as its publication would be prejudicial to the effective conduct of public affairs This is likely to delay the laying of our annual report and accounts. It was noted that Defra had laid its accounts in the intervening period. We have received

feedback from our recognised union in relation to this year's pay award, and intend to apply it in December.

The Board noted the changes to staffing in the period. It sought assurance on the perceptions of staff given the uncertainty in relation to the recruitment of a new Chair.

The Board noted the increasing significance and prevalence of cyber security incidents and the importance of management of this strategic risk.

The Board noted that we have not yet met with the new Secretary of State for Defra.

25.67 Report of the Audit and Risk Assurance Committee

The Chair of the Audit and Risk Assurance Committee outlined the business considered by the Committee. Key aspects of the Committee's discussion will be covered elsewhere on the Board's agenda.

25.68 Next steps for investigation into Water Framework Directive Regulations

This section has been redacted as it relates to information recorded for the purposes of OEP's functions relating to investigations and enforcement.

25.69 Combined Sewer Overflows - Publication of Investigation reports

The Board considered the outcomes realised through our investigation in relation to the regulation of Combined Sewer Overflows, and the investigations reports presented.

It commended the work that had resulted in meaningful change in practice by the public authorities involved, and the commitments to further steps. It sought assurance that the adoption of the recommendations set out in the investigation reports would be monitored.

The Board approved the draft investigation reports, and agreed to delegate to the Chief Executive, in consultation with the Chair, approval of any non-material amendments from fact-checking processes with the public authorities. It was confirmed this was underway.

The Board noted the Chief Executive intends to publish the reports, Information Notices and Decisions Notices in line with the transparency commitments of our Enforcement Policy.

25.70 A stocktake of our strategic context

The Board considered a stocktake of our strategic context. It recognised the picture of increasing unpredictability set out. It judged that this creates a need to be increasingly nimble and agile but focussed. We need to hone and develop our capability to work at speed, for fast opportunistic work that might arise. It felt there were opportunities to develop how can we deploy the evidence we already have in this way.

The Board felt that agility relies on having sufficient evidence, but we need to consider the right balance between developing evidence and capacity for rapid response. The legitimacy of the OEP depends on being evidence-led. It is on this which we have earned our position and reputation.

The Board's broad perception was that our balance is about right between evidence and response – it is in the agility of our response we may need to improve. We have demonstrated our credibility now, so we can afford to show less working in our work, potentially allowing us to be more responsive.

The Board endorsed the assessment that our statutory role and values – independent, evidence-led, purposeful, with integrity – will be valuable in the uncertainty and unpredictability. They can guide us as we do our role.

25.71 Our financial context

The Board considered the financial context for the coming years, and the assumptions informing the development of our budget for the coming period.

It recognised the constraint this will bring in the medium term. It endorsed that active decisions will be required to manage the impact of this, and judged that these are best approached by deciding an approach for a worst case, and building back from this smaller minimum, rather than any gradual approach from the current position.

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

The Board noted that the financial picture underlines other aspects of the Board's discussion. We need to improve the efficiency (or more accurately value for money) of our work and outputs. Engagement and communications and how we conceive of our products are key to this.

25.72 A stocktake of how we have impact

The Board considered a stocktake of how the OEP has impact, drawing on its prior discussions and the evidence we have since from our recent activities.

The Board endorsed the view that we achieve most of our impact through good engagement, and that we should not undervalue or under-resource these activities, including in a constrained context. It heard of the intention to embed consideration of communication and engagement earlier in our projects, to support this. It noted that our influence differs in different parts of government. We may need to be clearer on the key drivers of influence across government. This may mean we need to expand our network beyond the Defra and DAERA core, and potentially at a regional level.

The Board noted that we have not yet taken professional advice on how we improve our impact. It encouraged analysis of how our effort translates to impact as part of better understanding the interaction of value and cost.

The Board considered our EIP progress assessments. These have been critically important for us in our first years and underpinned our credibility. The Board encouraged us to think now whether our approach is right in the future. This may involve being clearer on the relationship between impact and effort. This may mean a leaner product, or product we use in different ways. In particular, the Board endorsed the view that we should think carefully about the 'deep dives' and whether these have impact.

The Board noted that we are yet to generate products or engagement with specific sectors and are yet to fully realise our aim to use the progress assessment as a catalyst

for engagement around different topic areas. The Board recognised the underused potential for the EIP progress analysis to be our core evidential base.

The Board had strong appetite for further thinking about what we think of as our products across all our functions, but particularly in relation to scrutiny of law. It judged that we could do shorter, more targeted, less comprehensive activities. Sometimes the depth is a barrier not an enabler of impact. We could ask key audiences what people value the most – to help us focus on shorter reports, different styles. It recognised that we achieve scrutiny and impact by ‘the act of looking’ and being seen to do it, by engagement, and by the products.

The Board expressed some concern that this should not undermine our statutory functions. These are set to require a particular response from Parliament and Government and we need to hold on to that uniqueness. It also noted that accountability is at the centre of our role.

25.73 The OEP in 2030

The Board considered the initial considerations presented in relation to the future organisational design of the OEP. It strongly endorsed the need to get ahead of the impact of flat cash on organisational design and structure.

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

The Board was not attracted to any approach that disproportionately realised savings in the capacity for evidence. This is core to our value, credibility and reputation. This is in line with the initial expectations to keep the broad proportions allocated between evidence, and permanent and temporary pay, similar to now.

The Board agreed that we must aim for our business as usual costs not to increase as a proportion of our total expenditure, and to seek opportunities that they reduce. This is likely to be difficult. The Board noted the intention to review our approach to estates, and corporate and enabling services, as part of this.

25.74 Annual Horizon Scanning Report

The Board received an analysis highlighting key risks, issues, and opportunities for the OEP over the next five years. Areas of focus included planning reforms, climate change impacts, chemical regulation, environmental permitting, and air quality, with recommendations and milestones.

The Board noted the content of the report, and how these had been developed, including through the intelligence survey and its analysis. It welcomed the report as important context to its deliberations.

25.75 Budget and business planning 2026/27

The Board discussed proposals for development of the 2026-27 business plan, noting the expected context of flat cash funding from Defra and DAERA, with some risk of lower settlements, particularly in England. The Board agreed that we should business plan for the scenarios set out.

In England, the Board recognised the value in the proposed work in relation to Planning and Water. In Planning in particular, it questioned the extent to which we intend to be

forward thinking – to shape the design and implementation of the law, so it has prospect of being as effective as possible – or evaluative, after the fact. We need to develop this view – where we can make more difference. It recognised the risk the papers set out about this being a ‘defensive posture’ not leading to environmental improvement. It sought that we do not overweight this work in our programme.

The Board recognised and endorsed the proposal to concentrate on nature’s recovery as the focus of our work in England, drawing together work on Nature, the EIP and Governance towards this end. In doing so, it thought we should follow through in the areas set out in our advice for the EIP rapid review, which it continued to think right.

As a result, it was explained and the Board acknowledged, that we would have limited scope to work on marine, waste or other issues, save as these are linked to nature’s recovery and the apex goal of the English EIP. The Board recognised and endorsed that this should allow us to develop a stronger narrative for our work, connected to people, plants and animals in places.

In Northern Ireland, the Board recognised the importance of continuing our work on nutrients for the next period of time, which likely means up until the next election in Northern Ireland. It continued to endorse the principle that our work in Northern Ireland is best delivered through a single area of thematic focus, adding specific tactical work for Northern Ireland, and from those bits of our broader work programme in England which are most relevant for Northern Ireland.

The proposal to focus our ‘Other Evidence’ work on chemicals regulation was discussed, noting that this is an area where we expect to only be able to make any contribution if we have a depth of evidence and understanding on which to draw. This is also a neglected area, and is high in our horizon scanning survey. We must keep in view the development of policy in respect of EU alignment.

The Board therefore agreed the priorities and planning ranges as proposed. In doing so, it emphasised the need to evolve the character of the organisation during delivery of the plan, and in particular in relation to the nature of the products and activities we may complete.

25.76 Medium-term research strategy

A research strategy has been developed alongside an Areas of Research Interest (ARI) document. This latter is a conventional way in which public bodies signal their research interests to the wider research community. The ARI is intended for publication on both the OEP and Government Office for Science ARI database to encourage engagement from academic and industry experts. The research strategy aims to help staff recognise the significance of research within the OEP’s issue-based approach, clarify ongoing research initiatives, and articulate how research is prioritised, undertaken, and communicated as part of the corporate plan.

The Board recommended that the strategy be subject to ongoing future review to ensure its continued relevance.

25.77 Any other business

There was no other business