

## **GOOD GOVERNANCE IN LOCAL GOVERNMENT**

Report of the Corporate Leadership Team

**Recommendation:** that the draft Governance Statement for 2015/16 be approved;

1. The Council is required, annually, to prepare and publish a governance statement in accordance with CIPFA/SOLACE guidance and comply with Regulation 6 of the Accounts and Audit (England) Regulations 2015. The Council is required to publish the statement alongside the Annual Statement of Accounts.
2. This is the ninth year for which the Council has been required to produce a Governance Statement and the attached draft has, as is usual, been produced in line with the previous year's versions, focusing on the six core principles of the CIPFA/SOLACE guidance which form the basis of the accompanying, detailed, schedule. The County Council's External Auditors, Grant Thornton, have previously reaffirmed the need for an Annual Governance Statement in this format.
3. In line with advice from the External Auditor the Annual Governance Statement should be considered and signed-off by this Committee in parallel with the Council's Statement of Accounts.
4. In recommending the adoption of the attached Annual Governance Statement the Corporate Leadership Team and Heads of Service confirm that the organisational, financial, compliance and operational key controls referred to therein and the accompanying schedule continue to be appropriate and that statements of internal control which support the content of this Statement have operated, effectively, during 2015/16.
5. This Report and the accompanying Statement have no specific equality, sustainability, public health or legal implications that are not already covered by or subsumed within the detailed policies or actions referred to therein.

**[Electoral Divisions: All]**

Local Government Act 1972: List of Background Papers

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<u>Background Paper</u>	<u>Date</u>	<u>File Reference</u>
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Nil

# **DEVON COUNTY COUNCIL Annual Governance Statement 2015/16**

## **Scope of Responsibility**

Devon County Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards and that public money is safeguarded, properly accounted for and used economically, efficiently and effectively. Devon County Council also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

In discharging this overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs so as to facilitate the effective exercise of its functions and manage risk.

The County Council has approved and adopted a code of corporate governance which is consistent with the principles of the CIPFA/SOLACE Framework Delivering Good Governance in Local Government.

A copy of these codes can be obtained from the County Treasurer. This statement explains how the Council has complied with the code and also meets the requirements of the Accounts and Audit Regulations 2015.

## **Purpose of the Governance Framework**

The governance framework comprises the systems and processes and culture and values by which the Council is directed and controlled; also the activities through which it accounts to, engages with and leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.

The system of internal control is a significant part of the framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing achievement of the Council's policies, aims and objectives, to evaluate the likelihood of those risks not being realised - and the impact should they be realised - and to manage them efficiently, effectively and economically.

The governance framework has been in place at the Council for the year ended 31 March 2016 and up to the date of approval of the Statement of Accounts.

Satisfactory controls to support statements made in this Annual Governance Statement are essential and in endorsing it the Council's officers confirm that input to systems and processing of transactions is complete for the financial year ended 31 March 2016 and that there were no material or significant delays or backlogs of either input or processes that would result in financial or other records being incomplete.

The Council's financial management arrangements also conform with the CIPFA/Solace guidance on the role of the Chief Financial Officer in Local Government (2010), enabling the County Treasurer to operate in line with the 5 principles set out in the 'Application Note Delivering Good Governance in Local Government: A Framework' to operate effectively and perform her core duties demonstrating commitment to good practice in governance and financial management.

## **The Governance Framework – The Council's Constitution**

The Constitution is fundamental to the working of the County Council, transcending the six core principles of corporate governance in the CIPFA/SOLACE Framework which form the basis of the response set out in the attached schedule.

The Constitution is the Council's Code of Corporate Governance. Framed in accordance with statute and Government guidance and evolved in the light of experience and subsequent legislation, it sets out how the Council operates, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and accountable to local people.

The Constitution is the guarantor of the continuing openness, accountability and integrity of the Council's decision-making processes and sets a series of exacting standards against which the Council's actions can be judged and, if necessary, challenged.

The Constitution is at the heart of the Council's business:

- it allocates power and responsibility within the Council and between it and partner organisations;
- it delegates authority for specific issues to act to the Leader, Committees, Cabinet Members and officers;
- it enables the people of Devon to ask questions at certain meetings and to have them answered or submit petitions;
- it sets down the procedures by which the people of Devon may give their views on the key decisions which the Council's Cabinet is to take;
- it regulates the behaviour of individuals and groups through codes of conduct, protocols and standing orders.

The Constitution comprises 16 Articles setting out the basic rules governing all aspects of the working of the Council (Part 2) and is then divided up into:

- the elements which define the Council's internal organisation, standing orders, financial regulations, schemes of delegation and terms of reference, procedures covering Cabinet and Scrutiny, Risk Management and Codes of Conduct (Parts 3–9);
- working practices which supplement these formal rules (Part 10);
- documents which focus on the Council's external operation through service delivery, community engagement and partnership working (Part 11).

In formulating its Constitution in 2002, the Council adhered closely throughout to the framework presented in Government's *Modular Constitutions for English Local Authorities*, enabling it to produce a constitution which was logical, integrated and accessible to members, officers, citizens and others interested in the way a local authority makes decisions and governs itself and its area. Then and subsequently, wherever legislation permitted local choice, the Council has framed its Constitution to take advantage of the most open and inclusive of the available options.

The Constitution is designed to meet all the necessary statutory requirements for instruments of governance and to include matters traditionally covered by local authority standing orders, financial regulations, schemes of delegation and terms of reference. It also contains the elements necessary to describe the Council's executive arrangements in a single, coherent document which can be used as a comprehensive point of reference by individuals and organisations inside and outside the Council. All the familiar elements can be found in the Constitution and the Council has sought to use the model format to create a genuinely accessible, meaningful instrument of governance.

The Council is committed to involving the community in setting its priorities, enabling citizens to raise matters with and convey their concerns to the Council and to considering the needs of all groups in the community and promoting democratic understanding and participation. The Council's Constitution provides that framework.

### **Review of Effectiveness**

The County Council's Constitution has been in force since 2002 and is regularly reviewed having been substantially amended in 2012/13 reflecting the requirements of the Localism Act and revised Standards arrangements. Minor changes were made in 2014/15 to reflect new regulations affecting, inter alia, the issuing of summonses at Council meetings electronically, dismissal of statutory chief officers and recording of officer decisions and also to the Council's public participation scheme. Except for annual revisions of the Pay Policy Statement and Chief Officer Employment Procedure Rules no significant changes were made in 2015/16.

The Constitution is published on the County Council's website at <http://www.devon.gov.uk/constitution.htm> and is also available for Inspection at the Council's offices.

The County Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including systems of internal control. This review of effectiveness is informed by the work of managers within the authority who have a responsibility for the development and maintenance of the governance environment, the Head of Internal Audit's annual report, and also by comments made by the external auditors and other review agencies and inspectorates.

Details of processes applied in maintaining and reviewing the effectiveness of the governance framework are summarised below.

### **The Constitution**

The roles and responsibilities of the Council, its Cabinet and non-Cabinet Members are set out more fully in Articles 6 and 7 of the Constitution and in Part 3 (Responsibility for Functions). These have been regularly reviewed and revised since the County Council elections in 2009 and are themselves balanced by the Codes of Personal Conduct set out at Part 6 of the Constitution.

The Council currently comprises 62 councillors, meeting together as the full Council for specific purposes, to decide the Council's overall policies and set the budget each year. Meetings of the Council and its Committees are normally open to the public. The Council appoints the Leader, Scrutiny Committees, the Standards Committee and all other committees. The Council receives the minutes of committees, and has power to vary or refer back decisions which are outside established policy. From time to time it also debates issues of particular relevance or topicality for the County.

### **The Cabinet**

The Cabinet is the part of the Council responsible for most day-to-day decisions. It is made up of a Leader and no more than nine other members (Cabinet Members), appointed by the Leader from amongst the membership of the Council. When major decisions are to be discussed or made, these are published in the Cabinet's Forward Plan in so far as they can be foreseen. These major decisions will be taken with council officers present at meetings of the Cabinet which will be open to the public except where personal or confidential information is discussed. The Cabinet has to make decisions which are in line with the Council's overall policies and budget. If it wishes to make a decision which is outside the budget or policy framework, this matter must be referred to the full Council to decide.

## **The Scrutiny Function**

Scrutiny Committees support the work of the Cabinet and the Council as a whole. They look at the effectiveness of the Council's own policies and inquire into matters of local concern. These investigations lead to reports and recommendations which advise the Cabinet and the Council on its policies, budget and service provision. Scrutiny Committees also monitor the Cabinet's decisions. They may "call-in" a decision which has been made by the Cabinet but not implemented. This enables them to consider whether the decision is appropriate and they may recommend that the Cabinet reconsiders it. They may also be consulted by the Cabinet or the Council on forthcoming decisions and the development of policy. An Annual Scrutiny Report is also prepared for and considered by the County Council.

The Health & Wellbeing Scrutiny Committee also monitors the function and activity of the Devon Health & Wellbeing Board and its statutory responsibility for the Joint Health and Wellbeing Strategy, the Joint Strategic Needs Assessment and the Pharmaceutical Needs Assessment.

Scrutiny Committees aim to operate in a non-partisan way which it is believed has served both the electorate and the Council well in line with the Constitution and the Council's protocol governing relationships between the Cabinet and Scrutiny Committees. Members of the Council may place items on the agenda of any Scrutiny Committee, a right which has always effectively existed in the Constitution since it was first adopted in 2002, reflecting the requirements of the Local Government & Public Involvement in Health Act and its definition of '*any local government matter*'.

It is widely acknowledged that, in order to be effective, call-ins must be used only in exceptional circumstances, sparingly and appropriately. In the year in question there were three instances of call-ins, which reinforce the independence and value of scrutiny in applying an 'external' view on decisions.

The Cabinet and Corporate Leadership Team remain appreciative of the work undertaken by the Scrutiny Committees and acknowledge that it has made a major contribution to the work of the Council, especially in areas where detailed objective research and analysis needed to be done.

Additionally and in the move towards a commissioning authority, scrutiny needs to continue to exercise influence through asking questions about delivery mechanisms, quality, monitoring, safety and responsiveness as an appreciative inquiry where problems are analysed and understood as a precursor to improvement and change rather than punitive action. Recognising this change to the way that Council services are delivered, the Corporate Services Scrutiny Committee established a Task Group in September 2015 to review the role of scrutiny in the Council's commissioning arrangements. The Task Group found that although there was evidence of scrutiny involvement in commissioning processes and in the monitoring of commissioned services, this was inconsistent across the Council's service areas. In response to this the Task Group recommended that a Scrutiny and Commissioning Protocol be established to clarify the role of scrutiny in commissioning processes, that scrutiny be enabled to hold joint venture partners and large providers to account through the inclusion of a contract clause requiring certain providers to attend and answer questions at Scrutiny Committee, and to strengthen scrutiny's role in the performance monitoring of joint venture partners and large providers.

More detailed information on the work of the County Council's scrutiny committees may be found in the various scrutiny annual reports available at <http://new.devon.gov.uk/democracy/committee-meetings/scrutiny-committees/scrutiny-annual-reports/>.

## **Organisational Performance**

The continuing impact of the Government's reform of the public realm services' (see below) has influenced the Authority's current and future performance. It is likely that a more flexible

organisational structure to respond to those challenges and better equip and position the Council to focus on its future strategic commissioning responsibilities will be required, as Government policy decisions impact on the Council.

The County Council had previously received an *inadequate* judgement from Ofsted following an unannounced inspection under section 136 of the Education and Inspections Act 2006 on the overall effectiveness of the arrangements in Devon to protect children. In February 2015 Ofsted undertook a month long unannounced inspection of the County Council's children's services. This included child protection, fostering and adoption, Integrated Children's Services and the Devon Safeguarding Children Board. The resulting judgement of the Ofsted Inspection published in May 2015 found that children's services in Devon *required improvement*, Ofsted having thereby acknowledged that there were no widespread or serious failures that create or leave children being harmed or at risk of harm and the welfare of looked after children is safeguarded and promoted and minimum requirements are in place. The Report's findings highlighted improvements in the quality of work and outcomes for children and families and that the welfare of looked after children was safeguarded and promoted.

On the 1 March 2016 the County Council received [a letter](#) from Children's Minister Edward Timpson stating that the Department for Education had ceased its formal intervention arrangements for children's services in Devon. In his letter the Minister said 'the services provided to children, young people and their families in Devon have improved significantly and the County Council can now be an example to other struggling authorities of how to bring about improvement.' The Minister cited strong leadership; a shared vision for children's services; success in workforce recruitment; improved audit and quality assurance systems and the more effective use of data as being key factors as to the County Council's improvement. Devon however still needs to embed and sustain its improvements across the service and ensure consistency across the County.

The Council also agreed the following policy changes or revised strategic objectives during 2015/16 which will impact on future performance namely:

- (a) the draft joint submission of the Heart of the South West Devolution Proposal working in partnership with the 17 local authorities, 2 National Park Authorities, the Local Enterprise Partnership and the 3 Clinical Commissioning Groups.
- (b) the future delivery model for the Highway Maintenance Service being a Core Term Maintenance Contract supported by other discrete contracts
- (c) a new Fair and Affordable Care Policy
- (d) a revised Energy Policy, Strategy and Action Plan and a revised governance structure for environmental performance
- (e) a new Living Well at Home - Domiciliary Care Provision and Personal Care Services Contract.

### **The Standards Committee**

The Standards Committee continued to exercise its role in monitoring complaints and standards. The number of complaints received against Councillors remains small. There were no cases locally where a councillor was found to have been in breach of the Council's Code of Conduct.

Efficient, effective and ethical governance protects the public interest and the Council itself. Members and Officers are supported by a wide range of policies and Codes of Practice enunciated in the Council's Constitution and also by a wide range of training opportunities tailored to meet their needs. The Council's Governance Framework is reviewed annually and any issues for the future governance of the Council are highlighted and addressed at that time.

The work of the Standards Committee during 2015/16 is set out more fully in its [Annual Report](#) but there were no significant issues arising from members conduct, the Council's feedback and complaints process or the Local Government Ombudsman's Annual Review Letter which warranted further action.

## **The Audit Committee / Devon Audit Partnership**

The Council's Audit Committee monitors the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources including the work of the Council's Internal Audit team and the External Auditor and the application of the Council's Risk Management policy.

The Audit Committee continues to review separately, on a regular basis, progress with and implementation of any recommendations made in Audit Reports into specific areas of activity to ensure they have been adhered to and appropriate management action taken.

The Audit Committee has agreed a revised Risk Management Strategy to be implemented from 2016 which, whilst retaining much of the current strategy, builds on best practice from the UK office of Government Commerce and the Management of Risk Guidance.

The Audit Committee continues to respond to enquiries from the external auditors regarding the overall control environment of the Council, with particular focus on arrangements to ensure that the production of the financial statements were free of material error. It expressed concern over changes to CIPFA's Code of Practice, causing a significant increase in the value of the Council's highway infrastructure assets from £425 million to an estimated value of £8-9 billion. The reasoning behind and the potential impact the revaluing of local authority assets in line with CIPFA and government requirements, which involved valuing highway assets at the gross replacement cost, rather than as was previously the case, using historical costs and applying depreciation.

The Devon Audit Partnership was established by the Council in conjunction with Plymouth City and Torbay Councils in 2009 to provide shared internal audit services (as a means of improving services through joint working and maximising efficiencies and economies of scale) reporting to the new Devon Audit Partnership. The Partnership currently undertakes audit work for a number of District Councils, Devon and Somerset Fire and Rescue Service, Devon and Cornwall Police, the University of Plymouth and many other public authorities and planned to continue expanding on their work with external partners. The Partnership and democratic arrangements are working well and will continue to be reviewed.

## **The Investment and Pension Fund Committee**

Accounting arrangements require separate accounts to be prepared for the County Council and the Devon Pension Fund. Recognising the need for clear governance arrangements for managing these Accounts the Council's Investment & Pension Fund Committee undertakes the role of reviewing and approving the Pension Fund Annual Report, which incorporates the Statement of Accounts. The Devon County Council Audit Committee undertakes the role to review and approve the accounts of the Devon Pension Fund to ensure appropriate accounting policies were introduced in the same way as it is responsible for monitoring and approving the Council's main accounts.

2015/16 saw the establishment of the Devon Pension Board. The Pension Board will help to ensure that the Devon Pension Fund is managed and administered effectively and efficiently and ensure that it complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator. The Devon Pension Board (comprising employer and fund representatives with an independent member) has met three times. The operation of the Board will be kept under review.

## **Engagement and Participation**

The County Council has always prided itself on the work it does, over and above statutory consultations, to encourage individuals from all sections of the community to engage with, contribute to and participate in the work of the Council. Examples of this are the Council's Communications Strategy, the Devon Voice (Residents Panel), Parent Carers Voice, and the Tough Choices events held by the Leader of the Council across the County as part of a wider

exercise by the County Council to consult and involve local people in determining the Council's priorities.

## **Education**

The County Council is committed to improving the life-chances of all Devon's children and young people, especially the most vulnerable. Local authorities have a democratic mandate to champion the interests of their local communities and ensure that services work effectively for children, young people and families, regardless of whether they attended local authority-maintained schools and settings or others, such as academies, free schools and independent specialist settings. The County Council acts as Corporate Parent for all children in care and therefore has a particular interest in the progress and attainment and hence achievement of all looked-after children.

The County Council's ambition is that no Devon child, regardless of their circumstances, is allowed to underachieve or their progress fall behind. For this reason, the County Council is committed to on-going commissioning of robust challenge and effective support for schools. Devon schools must enable vulnerable children and young people to achieve better by securing and sustaining improved standards of achievement for all children at all levels of ability and maximising outcomes at Key Stages 4 and 5. As well as developing a broader range of strategies to expand schools' universal offer especially for the most vulnerable and challenged children.

The County Council robustly challenges any underperformance and statutory non-compliance with an emphasis on vulnerable groups. An academies protocol is used to open a dialogue about underperformance in relation to state-funded independent schools such as academies and free schools. The protocol sets out the responsibilities for both academy schools and the County Council so that both parties share the same understanding of their respective roles in enabling the children and young people attending Devon schools achieve their potential. There is also an increased focus in monitoring children placed in independent specialist provision to ensure sharper accountability of these settings for the achievement of children.

The People's Scrutiny Committee undertook a major piece of work on school exclusions and made a number of recommendations which were subsequently endorsed and actioned by Cabinet aimed to reduce the use of fixed-term and permanent exclusions. These included:

- work to monitor disadvantaged pupils and those with special educational needs and disabilities in terms of the extent to which these children are represented amongst those subject to permanent and fixed-term exclusions.
- support schools in finding ways to become more inclusive by providing evidence-based knowledge and training about 'what works best'.
- guidance to all schools with regard to emotional and social education, as well as training to all schools on how effective pastoral support systems can be developed and provided for all pupils.
- investigate both the legality and effectiveness of the practice of providing 'late' and 'early' schools, and 'part-time timetables' in Devon schools, and issues guidance to all schools as a result.
- The need to improve the way schools provide for the needs of pupils who have mental health problems, with particular reference to the Child and Adolescent Mental Health Service (CAMHS) and its relationship to schools.

More information on the County Council's role and support to schools may be found at:

<http://www.devon.gov.uk/learningschools>



## Significant Governance Issues

The Local Government Boundary Commission for England published its final recommendations in January 2016 for the County Council's electoral arrangements for 2017 onwards. The Commission's final proposals had confirmed a reduction in the size of the Council of two councillors (from 62 to 60) with one fewer division in each of South Hams and Teignbridge, comprising 56 single-member divisions and 2 two-member divisions. The proposed new arrangements will need to be approved by Parliament and the necessary Order would be laid in Parliament in the early part of 2016, providing for the new electoral arrangements to come into force at the County Council elections in 2017 which will undoubtedly have an impact on the Council's governance arrangements moving forward.

One of the biggest issues addressed by the Council in 2015/16 was the setting of the budget for 2016/17 and in making sure that appropriate steps were taken and measures put in place to ensure that services delivered or commissioned by the County Council remained accountable and properly managed within the context of the new 4 year funding package. While members welcomed the degree of assurance the funding deal provides, the Joint Budget Scrutiny in January 2016 resolved that the Council should continue to press Government for a fairer allocation for Devon recognising more accurately the impact of providing services in a rural area. The Council should also seek greater clarity through the LGA on the impact of the Better Care Fund and on the meaning of 100% Business Rates Retention and any additional responsibilities or constraints likely to be imposed upon Councils in respect of the latter and upon the required Annual Efficiency Plans.

Whilst it had been widely anticipated that the provisional settlement would only provide figures for one year with subsequent consultation on changes to grant distribution methodology, the Government had instead introduced changes in this year and beyond and had provided grant figures for individual authorities over a four year period from 2016/17 to 2019/20. While the latter change was to be welcomed it was noted that the impact of this revised grant distribution methodology was that shire counties would, collectively, lose funding in 2016/17 and moreover, within the allocation to County Councils and Upper Tier Authorities, there had been a further re-distribution with funding flowing from Councils with a higher tax base to Councils with a lower tax base; it was thought that this was to compensate those authorities dealing with adult social care pressures who would raise less income from a 2% precept. The settlement had also confirmed that Councils could raise Council Tax by an additional 2% to help cope with the costs of adult social care, over and above the 'normal' maximum 2% increase that could be levied before triggering a referendum.

The impact of the next Government's spending plan on future financial settlements will also be a key issue for the Council to address in 2016/17 and beyond. Moreover and in addressing the findings of the 2015 Ofsted inspection, the Council will need to focus on its future strategic responsibilities.

The year saw a successful culmination to the arrangements agreed by the Council for the future management of its libraries with from 1 April 2016 Libraries Unlimited taking over the running of Devon's libraries. The new staff and community-owned social enterprise will run the service on the County Council's behalf. The move is intended to secure the future of all 50 of the County's libraries and save a further £1.5 million in addition to the £3 million already saved from the library service budget over the past three years.

The announcement by the Chancellor in the *Educational Excellence Everywhere* white paper that all schools would have to move out of local authority control by 2020, although subsequently revised, will if implemented have a considerable impact upon local authorities in managing the transition of schools to academies and through having continuing responsibility for :

- Schools place planning and admissions
- Championing the interests of parents and pupils (advocacy & accountability)
- Ensuring provision for vulnerable children and those with special needs/disabilities
- School transport

- Safeguarding

The County Council continues to adopt a prudent approach to its treasury management practices. The Council's strategy is soundly based on the principle that when balancing risk and return the security and liquidity of an investment is given a higher priority than the yield. Throughout the year, the Council has been active in managing investment and interest rate risk.

As a result of Government direction, Pension Fund Investments are working towards establishing pooled arrangements. Devon is working with other regional authorities to establish a project board, which will involve appropriate governance representation from each authority.

The Council also regularly reviews and updates its Investment Strategy and its Treasury Management Policy and Practices to ensure that they reflect best practice guidance as issued by the Chartered Institute of Public Finance and Accountancy (CIPFA). In line with that guidance, the policies were first scrutinised - as indicated above - by the Council's Corporate Services Scrutiny prior to consideration by the Council's Cabinet.

The Treasury Management Stewardship Annual Report for 2015/16 had not identified any significant issues to highlight, confirming that there had been: no long term borrowing requirements at that stage; that investment income targets would be achieved and all lending had been carried out in accordance with the Council's Treasury Management Strategy.

The Council formally places on record and expresses its appreciation to its entire staff for their continuing commitment to the delivery of high quality services for the people of Devon throughout this period.

### **Certification**

We have been advised on the result of the review of the effectiveness of the governance framework undertaken by the Cabinet, the Standards Committee, the Audit Committee, the Investment & Pension Fund Committee and by Scrutiny Committees and the plans, as summarised above, to address weaknesses and ensure continuous improvement of systems is in place.

We will over the coming year continue to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

**Signed**.....

Chairman of the Audit Committee, on behalf of Devon County Council

**Signed**.....

Chief Executive, on behalf of Devon County Council

30 June 2016