The Minutes of the 66th Meeting of the Audit and Risk Assurance Committee of the Office for Legal Complaints

Monday 19 May 2025

Members present:

Harindra Punchihewa, Chair

Alison Sansome

Georgina Philippou

In attendance:

Elisabeth Davies. OLC Chair – observing

Paul McFadden, Chief Ombudsman

Laura Stroppolo, Head of Programme Management and Assurance

Blessing Simango, Head of Finance, Procurement, and ICT

David Peckham, Head of Operations, Business Transformation and Business Intelligence

Aaron Rock, Enterprise Risk Manager (items 5 & 6)

Steve Pearson, Deputy Chief Ombudsman – (item 12)

Steve Moore, ICT Manager (item 13)

Alex Clarke, National Audit Office (items 1 to 6)

Emma Kernohan, Deloitte (items 1 to 6)

Sarah Hutchinson, Government Internal Audit Agency

Richard Orpin, Legal Services Board - observing.

David Winks, MoJ ALB Centre of Excellence – observing.

Apologies

Kasim Raja, MoJ ALB Centre of Excellence

Craig Westwood, Chief Executive of the Legal Services Board

Minutes: Kay Kershaw, Board Governance Manager

Item 1 – Welcome, apologies and declarations of interest

1. The Chair welcomed attendees to the meeting and introductions took place.

2. Apologies were noted.

3. The meeting was quorate with a lay majority present.

4. Georgina Phillipou declared her appointment on the Board of the Association of Accounting Technicians. All present **agreed** that this did not create a conflict of interest.

5. There were no other declarations of interest.

6. The ARAC Chair reported the resignation of Martin Spencer from the OLC Board. Martin had been a member of the OLC's Audit and Risk Assurance Committee (ARAC).

Item 2 – Previous minutes, matters arising and previous actions.

7. The minutes of the ARAC meeting held on 13 January 2025 were **approved** as a true and accurate record of the meeting.

8. ARAC **noted** the update on previous actions.

9. There were no matters arising.

Item 3 – External Audit update

10. External auditors reported on the progress being made on the audit of the 2024/25 financial statements. The following points were drawn to ARAC's attention:

    - The audit was progressing well and on track to be completed within the agreed timetable.

    - The first set of accounts reviewed by the auditors had been of a good standard. The auditors had requested some changes to be made to the accounts, and these were being actioned by the finance team.

    - Timely responses to the auditors' requests were being provided by the finance team

    - The audit planning report highlighted two significant risks: The presumed risk of management override of controls and the valuation of the right-of-use asset and lease liability.

    - Materiality had been set a 2% of gross expenditure and the error reporting threshold had been set at £7000.

    - A further update would be provided on the audit of financial statements at the next ARAC meeting in June.

11. The ARAC Chair drew the auditor's attention to the tight timetable for the production of the Annual Report and Accounts and requested that the OLC/LeO was notified at

the earliest opportunity of any issues arising during the audit that might cause a delay so that mitigating action could be taken.

12. ARAC **noted** the update from External Auditors

Item 4 – Annual Report and Accounts 2024/25

13. An update on the progress being made on the 2024/25 Annual Report and Accounts was provided by the Head of Finance, Procurement, and ICT and Head of Programme Management and Assurance. The following key points were made:

- The production of the Annual Report and Accounts was on track with the agreed timetable and provisional laying date.

- The lessons learned from the 2023/24 Annual Report and Accounts process had been heeded.

- Communication had improved, ensuring that any areas of uncertainty were quickly clarified with the auditors.

- Before submitting the first draft of the accounts to the auditors, balance sheet reconciliations had been conducted to ensure their accuracy and completeness and comparisons to the previous year's accounts had been made for income and expenditure and the balance sheet to provide auditors with assurance that the numbers were understood.

- A first draft of the financial statements, notes and front half of the Annual Report that had been submitted and reviewed by auditors and LeO had responded to their comments.

- Supporting documentation in response to auditors' requests was being submitted promptly.

- A version of the Annual Report and Accounts had been shared with the designers to add graphics and visuals; an updated version would be shared with auditors once this had been done.

14. In response to a question, ARAC was advised that the cost of open JR cases was included in the year-end accounts, but LeO had no contingent liabilities for JR to disclose.

15. ARAC **noted** the update on the progress being made on the 2024/25 Annual Report and Accounts.

Item 5 – Risk assurance review

16. A risk assurance report, setting out the position on strategic issues and risks, business unit risks and internal audit actions at the end of quarter one 2025/ 26 was presented by the Head of Programme Management.

17. In discussion, the following points were made:

- An update on the quarter four strategic risks and issues had been shared with the Board in April as part of a quarterly integrated performance agenda item, this update had also been included in ARAC's risk assurance report for completeness.

- In 2024/25, the strategic risks relating to absorbing demand volatility, leadership resilience and failure to deliver new impact objective had increased in scoring; the Scheme Rules risk had transferred to a business unit risk; and the strategic issue relating to attrition had been de-escalated to a strategic risk. A detailed review of the scorings for all strategic risks and issues would be undertaken at the end of quarter one.

- The sector driven strategic issue relating to demand volatility was out of tolerance due to its open risk appetite. LeO was doing all that it could within its control to manage this strategic issue, including progressing actions to deliver the OLC's strategic impact objective, the appointment of 20 FTE investigators to increase capacity, the implementation of process changes identified by the LEAN review and the implementation of LeO's new digital transformation strategy to increase productivity.

- Despite this, demand for LeO's service remained at the upper end of forecasts for 2025/26, and it was anticipated that this strategic issue would remain out of tolerance. ARAC was advised that most other similar organisations were also dealing with significant long term demand increases. The external auditors also highlighted that a number of organisations also had strategic risks and issues that were out of tolerance for a period of time due to external constraints and were having to accept this given that there were factors out of their control behind these risks and issues. Further consideration would be given to this strategic issue and its associated risk tolerance at July's risk workshop.

- Based on the risk appetite, six business unit risks were out of tolerance at the end of quarter 4 and were being actively managed to bringing them back within tolerance.

- ARAC had been content with the Executive's proposed 2025/26 strategic risks and issues, noting that: there had been no new strategic risks and issues identified; consideration may be given to the inclusion of an additional risk relating to operational transformation once the impact of the changes arising from the LEAN review and operational AI solutions had been assessed; there had been some minor proposed changes to the risk description for the strategic risks relating to the GPA Birmingham hub and staff attrition, and an adjustment to the risk appetite for the strategic issue relating to unacceptable queue of cases from eager to open. It was anticipated that a further update on the potential operational transformation risk would be provided once the wider impacts on service at a strategic level was understood.

- The Board's approval of the 2025/26 proposed strategic risks and issues, associated risk appetites and overarching risk appetite statement would be sought at the Board's risk workshop in July 2025.

- ARAC recommended that the strategic risk relating to the GPA Birmingham hub was actively managed to mitigate any further escalation of the risk.

- In 2024/25, two internal audits had received a substantial audit opinion and three had received a moderate opinion. There were no overdue audit actions. All audit actions remained on track to be completed within the agreed timescales and quarterly progress updates were provided to GIAA.

- The terms of reference for the first 2025/26 internal audit on IT delivery had been agreed by the Executive.

18. Following a detailed discussion, ARAC **noted** the risk assurance report.

Item 6 – Risk Assurance Map

19. The Head of Programme Management and Assurance presented a report highlighting the key findings of the Executive's annual review of the risk assurance map which had been undertaken in line with the three lines of defence model. The following points were made:

- In response to ARAC's previous feedback, improvements had been made to streamline the risk assurance map; the assurance ratings were now aligned to internal audit methodology, with standard internal audit classifications and RAG ratings used to reflect the Executive's assessment of risk and workstreams had been incorporated into the associated business areas.

- The overall assurance ratings for HR and EDI had improved compared to 2023/24.

20. In response to questions about how the assurance ratings shown on the assurance map were weighted; the policy review dates shown on the policy tracker and levels of compliance with the policy review timetable; and the red RAG ratings shown to reflect some risk appetites; the following points were made:

- When determining the assurance ratings shown on the assurance map, consideration had been given to the likelihood and impact of the risk, the residual risk score, the effectiveness of mitigations and controls, audit findings, policies, procedures and efficiencies identified through projects.

- The policy tracker that was presented to ARAC had reflected the position at the end of April 2025. At that time, some of the policies that had not been reviewed for some time were going through a review process and new policies were going through an approval process. The policy tracker had since been updated to reflect the current position and review dates had been updated. A process was in place to monitor the levels of compliance with the policy review timetable.

- The risk tolerance RAG ratings shown on the assurance map were determined by risk appetite and were in line with regular risk reporting to ARAC.

21. The ARAC Chair commented on the value of obtaining independent assurance on the second line of defence to ensure that any associated risks were under control. GIAA provided independent assurance as part of the second line of defence to the OLC in line with agreed annual internal audit plans.

22. Following discussion, the Head of Programme Management and Assurance **agreed** to give further consideration to the best way of providing ARAC with the assurance it had sought on key person risks, the transfer of ownership of risks to the Chief Ombudsman's successor, particularly those relating to engagement, and levels of understanding and compliance with OLC/LeO policies so that it could be discussed further at July's Board workshop, along with the identification of areas for future ARAC deep dives. Any decisions made about future deep dives should take into consideration the annual internal audit plan to avoid any duplication.

    ACTION: Head of Programme Management and Assurance to consider the best way of providing the assurance ARAC had sought on key person risks, the transfer of ownership of risks to the Chief Ombudsman's successor, particularly those relating to engagement, and levels of understanding and compliance with OLC/LeO policies so that it could be discussed further at July's Board workshop.

23. The impact of actions, controls and supporting data all contributed to the overall RAG ratings and were all tested as part of the second line of defence and demonstrated the link between the effectiveness of assurance work and the actions being taken to manage strategic risks and issues.

24. In response to a question, the Head of Programme Management and Assurance **confirmed** their confidence in the accuracy of the levels of assurance reported in the Assurance map.

25. Recognising the volume of information included in the Assurance Map, ARAC had welcomed a suggestion by the Chief Ombudsman for more analysis and commentary for all functions to be included in the Executive summary of future Assurance Map reports.

26. ARAC **noted** the assurance map, commenting on its clarity and transparency.

Item 7 – Internal audit update

27. GIAA presented the quarter four progress report.

28. In discussion, the following points were made:

    - The 2024/25 internal audit plan had been completed; final audit reports had been shared with ARAC out of committee and had been included in May's ARAC pack for completeness.

    - The audit of Stakeholder Engagement had received a moderate opinion with 3 medium recommendations; the audit of Contract Management had received a moderate opinion with 5 medium recommendations; and the audit of Supplier Payments had received a moderate opinion with 5 low recommendations.

- The audit opinion for Supplier Payments had been informed by the inherent risk, priority of the recommendations and the time required to complete them. Audit opinions were not informed by statistical criteria based on the number of high, medium or low recommendations.

- The ARAC supplement included in May's ARAC pack provided additional key information and insights to ARAC members, including details of ARAC member events and the new global internal audit standards.

- May's ARAC pack had also included the 2025/26 Audit Charter and MoU, which had been updated to reflect the new global internal audit standards, and the Fee Letter. The Fee Letter reflected an anticipated one-off 30% increase in GIAA's annual audit fee. This increase had been driven by necessary changes to GIAA's fee structure following the cessation of Treasury funding and the need to now recover all costs for the service it provides.

- The increase in GIAA's annual audit fee had been unexpected, having been announced only after the OLC's budget for 2025/26 had been agreed.

- To mitigate this budgetary risk, the Executive, after discussion with GIAA, the ARAC Chair and OLC Chair, recommended that the 2025/26 audit plan was adjusted to reduce the number of audits and in turn the annual audit fee.

- In response to feedback, GIAA confirmed that consideration was to be given to updating the Audit Charter to reflect the need for earlier communications about potential audit fee increases to enable organisations to make provision for them as part of their budget setting process.

- Engagement would take place with GIAA and external auditors in future as part of the OLC/LeO budget setting processes to ensure, as far as practicably possible, that any fee increases were accounted for prior to the OLC budget being finalised. The budget setting timetable, with key milestone dates would also be shared with them for reference.

- In response to a question, GIAA confirmed that the 30% increase in audit fee was comparable and consistent with increases applied to other ALBs. In some instances, other ALBs had reduced the size of their audit plan to mitigate the impact of the fee increase, in other organisations with larger audit plans it had been possible to reduce the number of days allocated for the audits. With a small audit plan like LeO's, reducing the number of days allocated for audits may impact their quality and so this option was not recommended.

- ARAC considered the proposed 2025/26 audit plan which now comprised of four audits: The delivery of operational IT system change in Q1; case work quality in Q2; recruitment, retention and vetting in Q3; and payroll in Q4. The audit plan also highlighted for ARAC's consideration cross departmental audits that would be conducted by GIAA in 2025/26 across the MoJ and some of its ALBs at no additional cost.

- Having reflected on the increasing threat of cyber-attacks and weaknesses in supplier resilience, it was suggested that there may be value in LeO/OLC

participating in the cross departmental audits on cyber security and system access to obtain further independent assurance, subject to ensuring that this did not duplicate existing work being undertaken as part of the government's cyber security assurance scheme, GovAssure, which requires annual independent assessments based on the National Cyber Security Centre's Cyber Assessment Framework. GIAA would liaise further with the Executive on this once the scope of the audits had been confirmed.

- Following discussion, having **noted** that financial assurance would be provided through the external audit of financial statements, ARAC **approved** the 2025/26 audit plan.

- Reports on GIAA's cross government work to highlight best practice, would be shared with ARAC in 2025/26, this would include a report on ARAC effectiveness.

- In response to customer feedback, GIAA had introduced a new element to its annual audit opinion to demonstrate the movement of the opinion over a period of time. ARAC welcomed this, commenting on the clarity it would provide on the progress and improvement that had been made by OLC/LeO.

29. ARAC **noted** the update from GIAA.

Item 8 – Financial governance and assurance

30. The Head of Finance, Procurement and ICT, presented the financial governance paper which set out the financial position for the period 1 April 2024 to 31 March 2025. The following points were drawn to ARAC's attention:

- At year end, operational expenditure was within tolerance and under budget by 0.66% and capital expenditure was underspent by 2.8%. Fifty-one percent of capital expenditure had been on IT software.

- Aged debts had remained consistent with the 2023/24 year end position, at 33%.

- On average, creditors had been paid within 25 days, and 93% of the invoices were paid within terms, an improvement of 6% compared to the previous year.

- Financial controls had been implemented to mitigate the risk of fraud or accounting errors.

- Provision had been made in the 2025/26 budget for an anticipated reduction in the Bank of England's base rate. As a consequence of the recent change in base from 4.5% to 4.24%, all things remaining equal, there would be a reduction of £3000 in interest received; this would have minimal impact on the budget.

31. The MoJ had been pleased to note that the year-end financial position remained within the required 1% tolerance.

32. In response to a question, ARAC was advised that the civil service pay remit remained a key external factor that may have a bearing on the OLC's 2025/26

budget. It was anticipated that an announcement on the pay remit would be made in June.

33. Following discussion, ARAC **noted** the update on financial governance and the mitigating actions being taken to control the risk of fraud and manage the budget.

Item 9– Lessons learned on the 2025/26 budget and business planning process.

34. A paper reporting on the lessons learned on the 2025/26 budget and business planning process was presented by the Head of Programme Management and Assurance.

35. In discussion, the following points were made:

- The Executive team had assessed the 2025/26 budget and business plan process to identify what had gone well, and where improvements could be made.

- Whilst the budget and business plan process had been challenging, with a number of pinch points, it was a well-managed process that had gone well.

- A collaborative approach had been taken towards developing the budget, this had included budget holders to ensure their understanding of the assumptions that underpinned it. The sensitivity analysis options had been continuously developed, and budget setting best practice had been taken into account.

- The process had been aided by consistent and aligned messaging on demand and its impact, and by LeO/OLC's clear focus on what it had wanted to achieve under the transparency element of the 2025/26 business plan.

- The regular engagement on demand, the implications of demand on operational performance and budget, and the transparency element of the business plan had been mutually beneficial to the LSB and LeO and would be continued as part of the 2026/27 budget and business plan process.

- Recognising the complexities associated with the OLC's strategic impact objective and the transparency element of the business plan, the Executive would be reflecting on how it could better communicate to stakeholders the extent of the demand challenges and the benefits the transparency element of the business plan would deliver.

- The Executive and LSB would continue to engage to identify a more succinct way for LeO /OLC to respond to the LSB's Budget Acceptance Criteria.

- The 2026/27 process was to be enhanced by the earlier drafting and sign-off of the budget and business plan deliverables.

- The cycle of 2025/26 Performance Sub-Group and ARAC meetings had been adjusted so that feedback following the 2026/27 budget and business plan consultation could be taken into account when finalising the assumptions and trajectories that inform the final budget and business plan and greater

assurance could be provided in response to ARAC's budget setting assurance criteria.

- The timing of the launch of the 2026/27 budget and business plan consultation would be adjusted to allow for any changes announced in the Autumn Statement to be taken into consideration.

- It was suggested that consideration could be given to further exploring the longer term strategic issues relating to sustained demand, both for LeO, its customers, the legal sector and more widely across the ombudsman sector at a Board to Board meeting between the LSB and OLC at a future date.

- The 2026/27 budget and business planning process would provide an opportunity for the LeO/OLC and the LSB to consider the role of the legal profession and the regulators in improving first tier complaints handling and seeking to reduce sector driven demand for LeO's service, taking into consideration the impact of LeO's model complaints handling procedures and tailored support programme and levels of compliance across the sector with LSB's guidance and requirements for regulators on first tier complaints handling.

- In response to the 2025 review of Board effectiveness, the role of the Performance Sub-Group was to be reviewed. This would take into consideration the strategic risks and issues associated with demand.

36. ARAC **noted** the lessons learned from the 2025/26 budget and business plan process and the improvements that would be made to the 2026/27 process.

Item 10 – Annual fraud report

37. The Head of Finance, Procurement and ICT, presented the annual fraud report.

38. In discussion, the following key points were made:

- There had been no known incidences of fraud in 2024/25.

- The Executive had assessed there to be a low level of fraud risk within the organisation based on its assessment of the effectiveness of the control framework.

- The controls that were in place mitigated the risk of material misstatements and material irregularity, both areas considered as part of the annual external audit of financial statements.

- LeO completed the MoJ's annual Counter Fraud Continuous Improvement Framework.

- LeO received guidance and support on counter fraud measures and cyber security from the MoJ.

- LeO submitted a quarterly report on counter fraud to the MoJ and reported any incidents of over-payments and payroll errors.

- LeO's cyber security controls included multiple layers of protection and verification and access to LeO's system was limited to only what was necessary.

39. ARAC **noted** the Annual fraud report.

Item 11– Attestations and single tenders report

40. ARAC **noted** the attestations and single tender report which provided details of three single tender justifications for the period January to March 2025.

Item 12 – Information rights and security incidents

41. The Deputy Chief Ombudsman presented the quarter four information rights and security incidents report.

42. In discussion, the following points were made:

- Overall performance in quarter four had been broadly consistent with previous quarters although the number of data breaches had increased by one.

- The main reasons for data breaches continued to be correspondence being issued to an incorrect recipient. Considering the overall volume of correspondence issued by LeO each quarter, the number of data breaches was low, and the Executive had assessed the implementation of further controls to be disproportionate as they would have a detrimental impact on operational performance. Data breaches would continue to be closely monitored.

- The number of near misses had been at a higher level since quarter two, when the quality assurance checks had begun to identify historic instances where security checks had not been completed before staff engaged with customers. The Security policy has since been updated to make it clear to staff what the requirements were when communicating with customers and the security incident log had been updated to capture the names of staff who failed to comply with the policy so that trends could be identified and additional action could be taken, in addition to the standard feedback that was provided by line managers to the individuals concerned.

- There had been one high risk data breach in quarter four which was reported to the Information Commissioner, relating to third party sensitive information inadvertently being included in an evidence bundle for Judicial Review. The bundle was subsequently destroyed both by the complainant and the Court, and no further action has been taken by the Information Commissioner. Feeback and further training has been provided to the individual who had issued the bundle.

- Statutory requests and regulatory disclosures remained consistent with previous quarters, although there had been a small increase in the number of subject access requests in quarter four.

- Consideration was being given to the feasibility of introducing software to handle statutory requests to help mitigate the risk of delays in responding to Subject Access requests and Freedom of Information requests.

- As part of the induction process, staff were alerted to the importance of forwarding Subject Access requests and Freedom of Information requests to the InfoSec team promptly due the statutory requirement to respond to such requests within a specified timescale.

- To mitigate the risk of any delay in the InfoSec team being alerted to Subject Access requests and Freedom on Information requests, reminders were also to be issued to staff to raise the importance of this.

- Consideration may be given to conducting formal identification checks before processing and responding to Subject Access Requests.

43. ARAC **noted** the Information rights and security incidents report.

Item 13 – Cyber security benchmarking and resilience standards

44. In response to an action arising from ARAC's meeting in January 2025, the Head of Operations, Business Transformation and Business Intelligence presented a paper on cyber security benchmarking and resilience standards.

45. In discussion the following points were made:

- Following engagement with external stakeholders and experts, the Executive had concluded that the best way to assess LeO's cyber resilience standards was to participate in the UK government's GovAssure cyber security assurance scheme.

- Whilst GovAssure was not a benchmarking tool, it would measure LeO's readiness and resilience to respond to hostile threats against other government departments and their ALBs based on critical national infrastructure criteria.

- The scope of the GovAssure framework was wide and included governance, third party vendors, new technologies and all areas of Microsoft, including Microsoft 365. Each area would be assessed against the framework over a period of time to enable LeO to assess the adequacy of its cyber security and identify any areas requiring improvement.

- In response to the recent retail cyber-attacks, LeO's cyber security had been reviewed, taking into consideration the adequacy of mitigating actions aimed at preventing attacks through third party vendors and email. Whilst no immediate or additional mitigating actions had been identified, LeO would remain vigilant to the risks and take into consideration any lessons learned from other cyber-attacks to ensure that improvements were made to strengthen its cyber security.

- The Chief Ombudsman **agreed** to give further consideration to the role of the Board in the decision making and approval process in the event of a cyber-attack and to update the Board accordingly.

ACTION: The Chief Ombudsman to provide an update to the Board on its role in the decision making and approval process in the event of a cyber-attack.

46. ARAC **noted** the update on Cyber security benchmarking and resilience standards

Item 14 – Annual ARAC self-assessment of committee effectiveness

47. The Board Governance Manager presented a paper reporting on the findings of a self-assessment questionnaire that had been completed by ARAC members to inform the 2025 ARAC effectiveness review.

48. In discussion the following points were made:

- The areas of strength identified by ARAC members had included: Committee membership; governance; the ARAC Chair; and ARAC's relationship with the Executive.

- The areas of development identified by ARAC members had included: Strengthening and improving the assurance framework; reviewing agendas to ensure a more strategic focus; more discussion time and incorporating more strategic deep dives; improving executive summaries and the length of some ARAC papers; and incorporating an annual face to face ARAC meeting.

- Emerging findings identified for ARAC to consider as part of a future action plan to address the findings of the self-assessment had included: a review of the deep dive agenda; a review of meeting agendas to incorporate more discussion time; the completion of a skills audit to ensure best use was made of OLC members' skills; consideration of members' availability to attend an annual face to face meeting; further consideration to be given at the annual Board risk workshop to linking risks to agreed appetite, the mitigations and timeframes for reducing risks to within the appetite.

- At the request of the ARAC Chair, members were asked to provide feedback on the emerging action points, including potential areas for future strategic deep dives ahead of the next Board effectiveness discussion that would be taking place at September's Board meeting.

ACTION: ARAC members to provide feedback on the emerging action points, including potential areas for future strategic deep dives ahead of the next Board effectiveness discussion that would be taking place at September's Board meeting.

- At the request of the ARAC Chair, the self-assessment questionnaire was to be shared with all other regular attendees of ARAC so that their views could also be taken into consideration as part of the 2025 review of ARAC effectiveness.

ACTION: The Board Governance Manager to arrange for the ARAC self-assessment questionnaire to be shared with all regular ARAC attendees.

49. Following discussion, ARAC **noted** the update on the 2025 self-assessment of committee effectiveness.

Item 15– Escalations to the Board

50. The following points would be escalated to the Board for further consideration:

- The sector driven strategic issue relating to demand volatility which was out of tolerance due to its open risk appetite.

- The consideration that would be given to the inclusion of an additional risk relating to operational transformation once the impact of the changes arising from the LEAN review and operational AI solutions had been assessed by the Executive.

51. A written report from the ARAC Chair summarising the key points of discussion at this meeting would be shared with the Board at a future date.

Item 16: Feedback on the effectiveness of the meeting

52. External attendees commented on the quality of meeting papers, which had provoked an effective discussion and a good level of debate and challenge at the meeting.

Item 17 – Any other business

53. There was no other business discussed.