

Minutes of the 123rd Meeting of the Office for Legal Complaints (OLC)

Thursday 20 October 2022

<p>Present: Elisabeth Davies, Chair Lis Bellamy Annette Lovell Hari Punchihewa Alison Sansome Dale Simon Martin Spencer Jane Martin</p> <p>Board Secretary Kay Kershaw</p>	<p>In attendance: Paul McFadden, Chief Ombudsman Steve Pearson, Head of Complex Casework and Deputy Chief Ombudsman Michael Letters, Head of Finance Laura Stroppolo, Head of Head of Programme Management and Assurance Debra Wright, Head of Head of People Strategy and Services (items 1- 12 and 15) David Peckham, Head of Operations Shazia Wahid, Programme Manager and staff observer Susan Bradford, Independent Service Complaint Adjudicator (item 4) Deb McIntyre, Operations Manager (item 6 - 9) Treena Moseley, Operations Manager (item 6 - 9) Mark Persard, Operations Manager (item 6 - 9) Luke Hutcheson, Business Intelligence Manager (item 6 - 9) Steph Godbold, Stakeholder and External Engagement Manager (items 11 and 13) Marie Miranda, Enterprise Risk Manager (item 12) Nikki Sinclair, EDI Manager (item 15) Sian Lewis, Research and Impact Lead (item 15) Nicole Idedevbo, Investigator (last 15 minutes of item 15)</p>
---	---

Preliminary issues:

The Board meeting was quorate.

Item 1 – Welcome, apologies and declarations of interest

1. The Chair welcomed attendees to the meeting, noting that the meeting was taking place during Black History Month and during LeO's Health, Safety and Wellbeing month.
2. There were no declarations of interest reported.

3. There were no apologies.
4. The OLC Chair changed the order of discussions on some of the agenda items. The minutes of this meeting reflect the discussions in the order set out in the agenda.

Item 2 –Previous Minutes

5. The minutes of the OLC Board meeting held on 15 September 2022 were **approved** for accuracy, subject to an amendment to paragraph 24, and **approved** for publication.
6. The minutes of the OLC ARAC meeting held on 30 June 2022 were approved for publication.

ACTION: Board Secretary to amend and publish the minutes of the OLC Board meeting held on 30 June 2022 and publish the minutes of the ARAC meeting held on 30 June 2022.

Item 3 – Previous Actions and Matters Arising

7. The Board ratified a unanimous decision made out of committee in October to approve the appointment of eight new Level One Ombudsmen, and a transfer of two seconded Level One Ombudsmen to permanent positions on the recommendation of the Chief Ombudsman.
8. A paper providing updates on previous actions was circulated to the Board ahead of the meeting. The following key points were made:
9. Action 4 Paragraph 15 from the September 2022 Board meeting: The Board **agreed** the closure of this action, **noting** that updates on internal and external communications on the Scheme Rules changes would be provided via the Executive Report and other regular Scheme Rules updates to the Board.

ACTION: The Board Secretary to close action 4 paragraph 15 from the September Board meeting.

10. Action 13 Paragraph 68 from the May 2021 Board meeting, action 3 paragraph 8 from the January 2022 meeting and action 4 paragraph 17 from the March 2022 meeting: Noting that elements of these actions had been completed, the Board **agreed** that these actions should now be closed and replaced with the following new action that captured the remaining outstanding elements of these actions. The completion date for the new action would be the end of March 2023.

ACTION: The Board Secretary to close action 13 Paragraph 68 from the May 2021 Board meeting, action 3 paragraph 8 from the January 2022 Board meeting and action 4 paragraph 17 from the March 2022 Board meeting and replace them with the following new action with a completion date of March 2023.

New Action: To commission an independent review of quality assurance across the redress sector to provide a benchmark for the efficacy and proportionality of LeO's own quality assurance framework and to inform whether a review of LeO's framework is required.

11. Board **noted** the update on previous actions.

Item 4 – Independent Service Complaint Adjudicators Mid-Year Report

12. The Independent Service Complaint Adjudicator (SCA) presented their mid-year report., drawing the Board's attention to the following key points:
- Number of Stage 3 Service Complaints reviewed over the last six months had been low; caution in drawing conclusions from this small sample size should be exercised.
 - The reasons for underpinning service complaints had been consistent with previous years. In addition, there had been some evidence of a misunderstanding of the remit of the service complaint process and the process for investigating lawyer complaints in some instances.
 - The Service Complaint Team had been receptive to the SCA's feedback on areas for improvement.
 - The SCA had been pleased that new appointments had been made to the SCA team which would address the recent resource challenges.
13. The Deputy Chief Ombudsman confirmed that action was being taken to address inconsistencies in the approach to communications about wait times to better manage customer expectations.
14. Having discussed the value of a mid-year SCA report considering the small number of stage 3 service complaints now being received, the Board concluded that there was benefit in receiving a mid-year report to draw attention to emerging trends, risks and any issues on quality, but it was noted that the small sample sizes would impact on the level of assurance that could be taken. The frequency of SCA reports may be reviewed again in the future.
15. The Board thanked the SCA for their report and for their high standard of work and commitment to improving customer experience and LeO's service complaints process.
16. The Board **noted** the SCA's Mid-year report.

Item 5 – Executive Report

17. The Board was advised that since the October Board papers had been issued, the financial forecast had moved from an overspend to an underspend position; this reflected the number of offers that had been made following a recent recruitment campaign. The underspend was being proactively discussed with the LSB, this was within 1% of the tolerance level for all ALBs expected by the MoJ; was being closely monitored by the Executive, and mitigating actions were being considered. In discussion the Board made the following comments:
- The OLC Board had not set and the LSB Board had not agreed tolerance levels for LeO; any tolerance levels set would need to be aligned to those set by the MoJ.
 - At an ARAC meeting earlier in the year, LSB's CEO had strongly encouraged the OLC/LeO to minimise any under/overspend.
 - It was important for the Executive to have contingency spending plans in place to utilise underspends.
18. Significant recruitment activity, some of which had been in response to internal promotions, had taken place for Operational and Corporate roles in September.

19. Competitor organisations had followed LeO's lead and were recruiting nationally and offering more competitive salaries. Despite this, and whilst not being able to recruit the number of operational roles originally planned, sufficient numbers had been recruited and adequate levels of enabling staff were in post to deliver effective induction and onboarding for the new recruits.
20. Seeking assurance on the delivery of the 2022/23 and 2023/24 Business Plans, Board members questioned: the scope for bringing forward the new recruits' start date; whether it might be desirable to conduct another round of recruitment in 2022/23 to minimise any adverse impact of future attrition, and whether it would be feasible to appoint previously unsuccessful assessment centre candidates. In response the Executive explained that:
- The earliest possible start date had been agreed for the new recruits, this took into account their notice periods and LeO's capacity to onboard staff in a way that minimised any adverse impact on performance.
 - Attrition had been built into the Business Plan and LeO had already over-recruited to take account of expected attrition in 2023/24. The operational cost of an additional recruitment campaign would be disproportionate to any budgetary or performance benefits gained.
 - The scope for appointing previously unsuccessful assessment centre candidates had been considered but, to ensure the quality of LeO's staff, the Executive would not be pursuing this approach.
 - If further recruitment was required to ensure the delivery of the 2023/24 Business Plan it would best take place in Q1 with a view to new staff joining the organisation in May.
21. There were no significant updates on the Hub Strategy to report. The Executive would be making a decision on the Leeds Hub in November and the Board would be updated accordingly.
22. The CO and OLC Chair updated the Board on high level discussions that had taken place at the LSB conference on Reshaping Legal Services.
23. The Board **noted** the Executive report.

Items 6 - 9 – The Performance Dashboard and Quarter Two Reporting

Operational Performance

24. The Head of Operations drew the Board's attention to the following key points:
- September's performance had been on track to meet Business Plan targets until 1.75 days productivity were unexpectedly lost to a global CMS outage and an additional Bank Holiday; this led to 815 cases being closed against a Business Plan target of 869.
 - The Pre-Assessment Pool (PAP) reduced for the seventh consecutive month in line with performance trajectories.
 - There has been a strong start to October and, despite fewer working days, case closures were expected to exceed 800.
 - A 55% year to date increase in case closures had been seen (67% in Q2 compared to the same period in 2021/22); this was in addition to the 40% increase that had

already been seen in 2020/21. Operational performance improvement had been achieved through process efficiencies and with fewer established staff.

- Business Plan trajectories for 2023/24 were to be revised to take account of the known impact of the Scheme Rules changes. Scheme Rules changes were expected to reduce core demand by 10%.
- LeO forecasts to have an acceptable level of work in progress (WIP) in the PAP and Business as Usual (BAU) by the end of 2023/24.
- Baseline data was not yet available to determine the impact of the amendment to Scheme Rules 5.7 or 5.19; this would be reviewed in Q3 2023/24.

25. In discussion, Board members sought to understand the levels confidence underpinning the assumed 10% reduction in core demand resulting from the Scheme Rules changes; questioned how changes to time limits would be handled during the transitional period and what plans were in place to communicate the Scheme Rules changes to the legal sector. In response, the following key points were made:

- The assumed 10% reduction in core demand had been based on forecast modelling and cautious estimates.
- As part of the Scheme Rules Engagement Strategy, early communications would be issued to the legal sector and the regulators informing them of the Scheme Rules changes that would take effect on 1 April 2023 and the action they should take to communicate these changes to their clients.
- During the transitional period, when it was fair and reasonable to do so, Ombudsmen would exercise their discretion in response to information set out in client care letters on time limits.

26. The Executive was advised of an increase in stage 1 conveyancing complaints caused by delays resulting in missed mortgage offer deadlines which may have implications for demand of LeO's services.

27. In discussion, Board members questioned whether there were any risks that would prevent November's Business Plan trajectories being achieved; whether there were any risks that would prevent the PAP performance trajectories being achieved by end of 2023/24, and whether it would be feasible to bring forward the end of 2023/24 PAP performance trajectory by six-months. In response the following points were made:

- The Executive did not currently foresee any risk to achieving the Business Plan trajectories in November but this would continue to be closely monitored.
- The delivery of the PAP was listed as a Strategic Issue on the Strategic Risk Register (SRR). The factors that would prevent the delivery of the PAP in line with performance trajectories, the controls and mitigations were set out in the SRR which was reviewed as a standing agenda item at all ARAC meetings.
- The assumptions underpinning PAP performance trajectories were regularly reviewed by the Executive; internal resource was flexed to respond to any changes.
- The current PAP performance trajectories would ensure that optimal performance was achieved in good time to deliver the 2023/24 Business Plan and that there would be adequate resource to meet core demand at the start of 2024/25.

- Bringing forward the 2023/24 PAP performance trajectory by 6 months would require budget to recruit additional staff and would require operational resource to support the recruitment and training of the new staff. Considering this, and the lead time on recruitment, any benefits would be limited. In addition, any increase in resource above the numbers already planned would have adverse implications on future levels of work in progress (WIP).

28. The Board **noted** the agile approach that was being taken by the Executive and the hard work underpinning operational performance improvements.

People

29. Board members commented on the need for a Reward Strategy to encourage staff retention and the need for contingencies to be built into LeO's planning to ensure adequate levels of resource to deliver the Business Plan and operate in a steady state. Responding to the points made, and updating the Board on the reprioritised People Strategy, the Head of People Strategy and Services stated that:

- Attrition, attraction and retention was a key part of the People Strategy; the Reward Strategy and career development was an integral part of this. An External Consultant was supporting the HoPS&S to develop LeO's total reward strategy.
- Attrition was on a downward trend. Some positive attrition had been seen in Q2 arising from internal promotions and career development. There had been no attrition amongst staff recruited to work from the Cardiff Hub. Lessons had been learned from the attrition seen amongst the March cohort which mainly related to issues around performance, quality and remote working.
- The response rate to the Civil Service People Survey had increased to 53% since the October Board papers had been issued. The closing date for the survey had been extended.

30. Board members had been pleased with the progress being made on delivering the People Strategy, particularly regarding recruitment and managing sickness absence, and commented on the opportunity LeO now had to develop a strong and appealing total reward package to underpin staff retention.

31. In response to a request for early sight of the Civil Service People Survey results, the Board was advised that results would be shared as soon as LeO was able to do so. A detailed report would be presented to RemCo at its first meeting in 2023.

32. Board members questioned what an acceptable attrition rate would be for LeO. In response, the Executive advised that it currently considered an acceptable attrition rate to be 19% but hoped to drive this figure down over time.

The Head of People Strategy and Services updated the Board on emerging plans for the EDI Manager role and confirmed that they would engage and update the OLC Chair and EDI Board Sponsor on the final plans for this role and how it would be undertaken during the intervening period before an appointment was made.

Quality and Service

33. The Deputy Chief Ombudsman (DCO) reported on Q2 Quality and Service, drawing the Board's attention to the following key points:

- BAU performance against quality outcomes was stable and remained broadly consistent with previous quarters. Some communication issues had been identified and were being addressed on a case-by-case basis. BAU performance against customer standards had declined and interventions were in place to address this.
- An strategy
- quality framework was in place for FET; this was being refined on an iterative basis. FET performance against quality outcomes was broadly in line with expectations, but there were a small number of instances where the process followed to reach the outcome had not been of the standard expected. Action was being taken to address this. FET performance against quality service metrics was lower than expected. Action was being taken to address this.
- No new issues had been identified from Quality and Service reviews.
- Customer Satisfaction scores for FET and BAU would be available for discussion at the February Board workshop.

34. In response to points raised, the DCO clarified that when determining whether an outcome was reasonable, consideration was always given to both the reasonableness of the decision and the process followed to make that decision.

35. Board members welcomed the inclusion of Quality and Service in Q2 reporting, and the level of scrutiny that LeO applied to the service it provided to customers. Overall, Board members felt that the right balance of information had been reported on Quality and Service but **recommended** that a section highlighting the key points for the Board to note was included in future reports; this should include details of the actions being taken to improve quality review scores on service and outcomes.

ACTION: The Deputy Chief Ombudsman to include a section in the Quality and Service report to highlight the key points for the Board to note, including details of the actions being taken to improve quality review scores on service and outcomes.

Finance

36. The Head of Finance advised that the financial forecast that was reported in the October Board pack included changes to Employer National Insurance contributions and a reduction in pool ombudsman resource but the forecast had since been updated to reflect the number of offers made following a recent operational recruitment campaign which has led to an increased underspend.

37. Strong controls and processes were in place to manage aged debts and the payment of creditors, both of which had reduced significantly and were now at a low and stable level.

38. The CO reported that due to the increase in front-end case closures, which did not attract case fees, a shortfall in case fee income was expected. Engagement was taking place with the LSB on this and the implications for levy. Consideration was also being given to the potential impact that the Stage 2 Scheme Rules changes might have on future case fee income and the Board would be kept updated on this.

39. Following a detailed discussion, the Board welcomed the revised format of the quarterly reporting against the Performance Dashboard. Noting the absence of information on the Hub Strategy in the Q2 reports, a request was made for an update on the Hub Strategy before the next Board meeting.

ACTION: The Head of Programme Management and Assurance to provide an update on the Hub Strategy before the next Board meeting.

40. The Board **noted** the Performance Dashboard and quarter two reporting.

Item 10 – ARAC Update

41. The ARAC Chair reported on the October ARAC meeting, advising that significant improvements had been seen in the quality of papers presented to the Committee. Reports had been received on Risk Assurance, including the risk wireframe, Internal Audit, External Audit, Financial Assurance, Budget Setting Principles, Information Rights and Security Incidents, the Security Policy Framework Self-Assessment and the 2022 ARAC Effectiveness Review.

42. Good progress had been made on Risk Assurance.

43. The Budget and Business Planning Audit had received a substantial rating. The audit on Grievances and Staff Complaints had been deferred until sufficient HR resource was available to support the audit.

44. External Auditors had commented positively on the improvements seen during the 2021/22 audit of Financial Statements. ARAC had reviewed and agreed the 2021/22 Management Letter.

45. The Committee had agreed an ARAC meeting protocol in response to a recommendation made following the ARAC Effectiveness review.

46. The Board **noted** the ARAC update.

Item 11 – Annual Report and Accounts 2021/22: Lessons Learned

47. The Head of Programme Management and Assurance reported on the lessons learned from the 2021/22 Annual Report and Accounts process and the recommendations made for further improvements.

48. In discussion the OLC Chair reported on plans to include data on Social Mobility in the 2022/23 Annual Report. The Board was advised that LeO was engaging with a sustainability consultant which would aid Environmental Social Governance reporting in future Annual Reports.

49. The Board had been pleased with the continuous progress being made on improving the Annual Report and Account process and **noted** the lessons learned from the 2021/22 Annual Report and Accounts process.

Item 12 – Risk Management Framework Policy and Risk Appetite Statements and Tolerances

50. Board members reviewed and provided feedback on the revised Risk Management Framework Policy, 2022/23 Strategic Risk Register, Risk Appetite Statements and Tolerances which had been further developed in response to the Board's feedback at the Risk Workshop in September. Following discussion, the Board:

- **Approved** the Risk Management Framework Policy subject to further alignment to the OLC Governance Framework and more clarity the Board and ARAC's roles in terms of the 3 lines of defence model.
- **Approved** the revised 2022/23 Risk Appetite Statement for inclusion in the Risk Management Framework.
- **Approved** the 2022/23 Strategic Risks for inclusion in the Strategic Risk Register.
- **Approved** the 2022/23 Risk Tolerance (key metrics and RAG ratings) subject to the removal any ambiguity in the references to 'greater than' and 'less than'.

ACTION: The Risk Manager to update the Risk Management Framework Policy to ensure that it was aligned to the OLC Governance Framework and provided more clarity the Board and ARAC's roles in terms of the 3 lines of defence model.

ACTION: The Risk Manager to refine the 2022/23 Risk Tolerances to remove any ambiguity in the references to 'greater than' and 'less than'.

51. The Board **noted** that the Strategic Risk Register and Risk Tolerances would be reviewed at all ARAC meetings and would be updated in line with an iterative approach. Any changes would be reported to the Board in the Risk and Audit section of the Executive Report.

Item 13 – 2023/24 Budget and Business Plan

52. Board members reviewed and provided feedback on Budget Acceptance Criteria and Business Plan Consultation document. Recommendations were made to further improve the drafting of the documents and strengthen the key strategic messages.
53. Board members were asked to forward their commenting on the editing of the documents directly to the Stakeholder and External Engagement Manager.
54. Following discussion, the Board:
- **Approved** the Budget Acceptance Criteria, subject to feedback on further improvements and drafting changes and **agreed** to delegate final approval of the document to the OLC Chair.
 - **Approved** the Business Plan Consultation document and one year strategy, subject to feedback on further improvements and drafting changes which included a very clear narrative on the Scheme Rules changes and **agreed** to delegate final approval of the document to the OLC Chair.

Item 14 - Scheme Rules Changes: Update on Progress

55. The DCO reported on the progress being made on delivering stage 1 of the Scheme Rules changes, which was a significant and complex and piece of work requiring considerable development and testing of the changes to be made LeO's systems and processes. In discussion, the following key points were made:
- A project management methodology had been adopted and all work to be completed had been mapped out along with the resources required to complete it. Every effort had been made to minimise the impact of this work on operational performance. Recognising the extent of the work involved and the limited resource available a

Board member suggested that the Executive might want to consider prioritising some aspects of the work.

- Internal and external communications strategies were in place to ensure that stakeholders were kept informed of the changes. Regulators and professional bodies would be asked to share correspondence from LeO with the Legal Sector to update them of the changes being made and the actions they would need to take to update their complaints handling processes and client information.
- The Scheme Rules changes would also be widely publicised to mitigate the risk of any adverse impact of the changes on the public, particularly those changes to time limits, and engagement on this would take place with the Consumer Panel.
- The Scheme Rules changes were not intended to deny access to justice. The Ombudsman would exercise discretion and apply the fair and reasonable test when assessing complaints received outside of the new time limits.

56. Reflecting on the draft 2023/24 Business Plan, the Board questioned the Executives' confidence in the assumption that the Scheme Rules changes would deliver a 10% reduction in core demand. In a detailed discussion, the Board was advised that there was no absolute certainty on the impact of the Scheme Rules changes on demand at this time and the assumptions had been based on forecast modelling and cautious estimates.

57. The impact of the Scheme Rules changes would be carefully monitored and reported as part of regular Board reporting.

58. The Board **noted** the update on the Scheme Rules changes.

Item 15 – EDI Update

59. The Board was updated on the good work and progress that had been made on EDI over the last six months. In discussion and in response to questions raised, the following key points were made:

- Considerable progress had been made on aligning the EDI strategy and objectives with the wider HR strategy.
- Two meetings of the EDI Steering Group had taken place.
- Three established Staff Network Groups were in place and in response to an expression of interest, a Women's Network Group would be launched in November.
- The REACH Network had made considerable progress in terms of its focus, vision and contribution to LeO. More work was to be done to better establish the Disability and Carers Network.
- The Staff Network Groups now had a better understanding of their role and how they could contribute to the organisation.
- LeO had consulted with Staff Networks Groups on the EDI strategy, the People Plan, HR Policies and the Scheme Rules changes and feedback had been received which had helped to inform LeO's approach to this work from an EDI perspective.
- LeO's recruitment strategy was being reviewed. As part of this work recruitment data would be analysed to identify any barriers to recruitment; this would inform any changes

required to ensure that LeO adopted the best approach to attracting and recruiting a diverse range of staff.

- Positive feedback had been received from recently recruited staff on LEO's fair, open and transparent recruitment process and Staff Networks had confirmed that LeO was a fair and caring employer.
- LeO would be working closely with MoJ Networks and Civil Service Peer Groups in the future; closer working with these groups would ensure that LeO had greater access to information and resources to support its work on EDI.
- The OLC Chair attended quarterly meetings with the Chairs of the Staff Network Groups. A pre-Board seminar with the Disability and Carers Network had been added to the Board's forward plan for 2023.

60. LeO had undertaken research to determine whether there were any differences in the outcomes (resolution stage and satisfaction levels) for complainants for groups with protected characteristics and to understand the factors that might contribute to any differences in outcomes. Slides, setting out the high-level findings of the analysis of this complainant demographic data, which was found to be broadly consistent with benchmarking data on users of legal services, was presented to the Board along with information on LeO's plans to further improve EDI data collection, analysis and reporting.

61. It was **agreed** that the slides of this presentation would be shared with the Board.

ACTION: The Board Secretary to share the slides of the presentation on complainant demographic data and LeO's plans to improve EDI data collection, analysis and reporting with the Board.

62. The Board had been pleased with this research and the insight it provided and welcomed the improvements being made by LeO to collect EDI data earlier in the business process so that it could be tracked and analysed throughout the customer journey.

63. Considering that LeO did not hold EDI data on legal service providers, the Board welcomed LeO's plans to engage with the SRA to gain insight on this and sought to understand whether LeO had the opportunity to collaborate with any other organisations on EDI. In response, the EDI Manager reported on their role as Chair of the Ombudsman Association's EDI Group and the opportunities this provided to engage with other Ombudsman Schemes and gain insight on EDI.

64. The Board heard from a member of staff on the significance of Black History Month, what it meant for them and why it was important for LeO / OLC to be an ally and to understand and actively support the rights of minority or marginalised groups whilst not being a member of those groups.

65. It was **agreed** that the OLC Chair would follow up on the Big Promises made by Board members earlier in the year outside of the meeting.

ACTION: The OLC Chair to follow up on the Big Promises made by Board members outside of the meeting.

66. The OLC Chair thanked everyone who had contributed to this agenda item for their hard work and commitment to EDI.

67. The OLC Chair, on behalf of the Board, thanked the EDI Manager for their dedication, commitment and hard work during their time at LeO and wished them every success in their new role.

68. The Board **noted** the EDI update.

Item 16 – OLC Governance Framework

69. Due to time restrictions, the OLC Chair advised that this agenda item would be deferred. Consideration would be given to the best way for the Board to approve the new OLC Governance Framework. In response to feedback, the OLC Chair also agreed to consider the best way of reminding the Board of its governance responsibilities at the December Board meeting.

ACTION: The OLC Chair to consider the best way of reminding the Board of its governance responsibilities at the December Board meeting and the best way of receiving Board feedback and approval of the new OLC Governance Framework.

Item 17 – Transparency Publications Reports

70. The Board **noted** and **approved** the following documents for publication:

- The Q2 Board Member Register of Interests, subject to an amendment to Dale Simon's entry on the register.
- The Q2 Ombudsman and Senior Manager's Register of Interests.
- The Q2 Gifts and Hospitality Report.

71. A query was raised about the accuracy of the expenses reported for Alison Sansome; this was to be resolved by the Head of Finance before the Board Member and Senior Manager expenses, which included expenses received in July 2022 relating to Q1 2021/22, could be published.

ACTION: Board Secretary to publish the Q2 transparency reports, subject to an amendment to the Board Member Register of Interests and clarity on the accuracy of the expenses reported for Alison Sansome.

Item 18 - Board Paper Redactions and Non-Disclosure Report

72. The Board reviewed a paper setting out the redactions and items for non-disclosure proposed in respect of the October Board papers.

73. The Board **approved** the items identified for redaction and non-disclosure.

ACTION: The Board Secretary to publish the October Board papers in line with the Board's approval of the redactions and items for non-disclosure.

Item 19 – Board Effectiveness

74. In line with the Board's commitment to improving Board effectiveness, Martin Spencer reflected on the Board meeting; the following key points were made:

- The Performance Dashboard paper reporting on Q2 Operational Performance had been the best Board paper; the improved format of this paper, with its combination of graphical information and narrative, had enabled the Board to focus on the key issues and some good discussions had taken place.

- The best session had been on EDI. The customer outcomes data had been insightful, as had been the presentation on Black History Month and its significance.
- The papers in the October Board pack had been too lengthy. It was recommended that improvements to Board papers could be made by reducing the amount of detail and focussing instead of key points and key questions to help ensure the focus and quality of Board discussions.

Item 20 –Any other Business

75. It was noted that the Board had not had an opportunity to discuss the Ombudsman decision letters that had been shared with them prior to the Board meeting. The OLC Chair suggested that Board members provided to feedback on the Ombudsman Decision letters by email to the Board and Executive and confirmed that further consideration would be given to scheduling time in the Board forward plan for the Board to discuss this at a future Board meeting.

ACTION: Board members to share feedback on Ombudsman letters by email to the Board and Executive.

ACTION: The OLC Chair to schedule time in the Board forward plan for the Board to discuss the Ombudsman Decision letters at a future Board meeting.