

1 SCOPE OF RESPONSIBILITY

- 1.1 Uttlesford District Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for and used economically, efficiently and effectively. Uttlesford District 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.
- 1.2 In discharging this overall responsibility, Uttlesford District Council is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, which includes arrangements for the management of risk.
- 1.3 Uttlesford District Council has approved and adopted a Code of Corporate Governance, which is consistent with the principles of the Delivering Good Governance in Local Government: Framework (CIPFA/SOLACE 2016). A copy of the authority's Code of Corporate Governance is on our website at www.uttlesford.gov.uk or can be obtained from the Council Offices, London Road, Saffron Walden, Essex, CB11 4ER. This statement explains how Uttlesford District Council has complied with the code and also meets the requirements of Accounts and Audit Regulations 2015, regulation 6(1)(a) and (b), which requires all relevant bodies to conduct a review of the effectiveness of the system of internal control required by regulation 3; and prepare an annual governance statement.

2 THE PURPOSE OF THE GOVERNANCE FRAMEWORK

- 2.1 The governance framework comprises the systems and processes, culture and values by which the authority is directed and controlled and its activities through which it accounts to, engages with and leads its communities. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate services and value for money.
- 2.2 The system of internal control is a significant part of that 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 on-going process designed to identify and prioritise the risks to the achievement of Uttlesford District Council's policies, aims and objectives, to evaluate the likelihood and potential impact of those risks being realised, and to manage them efficiently, effectively and economically.
- 2.3 The governance framework has been in place at Uttlesford District Council for the year ended 31 March 2019 and up to the date of approval of the annual statement of accounts.

3 THE GOVERNANCE FRAMEWORK

- 3.1 Some of the key features of the governance framework are set out in the following paragraphs.
- 3.2 The Uttlesford District Council Corporate Plan 2018/2022 outlines the aims and four priority areas and it is complemented by the Medium Term Financial Strategy and together these represent the key planning documents for the Council. This was again underpinned by an annual delivery plan setting out the specific projects/activities that would contribute to the Council's priorities. The Corporate Plan is reviewed annually and takes account of feedback from public consultation carried out via a Citizens Panel, as well as data and analysis relating to the residents, communities and businesses in the District. The Corporate Plan 2019/2020 was approved by members at the Council Meeting held in February 2019.
- 3.3 Delivery of the Council's Corporate Plan is supported by the Corporate Plan Delivery Plan 2018/19 and service plans in which the corporate objectives are translated into more specific aims and objectives. These are then cascaded down into individual performance development reviews through the council's U-Perform system. These all include targets and, where appropriate, service standards against which service quality and improvement can be judged. Performance against the delivery plan is monitored by the Corporate Management Team (CMT) and Cabinet, while service plans are monitored by individual services and formally reviewed quarterly by the CMT. In addition, the Council's key performance indicators are monitored quarterly by the Governance, Audit & Performance Committee. Satisfaction surveys and a formal complaints procedure allow the Council to gauge customer satisfaction
- 3.4 Uttlesford District Council has adopted a Constitution which establishes the roles and responsibilities for members of the executive (the Cabinet), Governance, Audit & Performance, Scrutiny, and Standards Committees, together with officer functions. It includes details of delegation arrangements, the Members' Codes of Conduct and protocols for member/officer relations. The Constitution is kept under review to ensure that it continues to be fit for purpose. A Code of Conduct for Staff is in draft form and is expected to be finalised early in 2019/20. There is a guide to disciplinary standards; conduct of officers is directed by Human Resource Policies (HRP) and through the values and behaviours which are part of the Council's individual performance review system known as 'U-Perform'.
- 3.5 The Constitution contains procedure rules, standing orders and financial regulations that clearly define how decisions are taken and where authority lies for decisions. The statutory roles of Head of Paid Service, Monitoring Officer and Chief Financial Officer are described together with their contributions to provide robust assurance on governance and that expenditure is lawful and in line with approved budgets and procedures. The influence and oversight exerted by these posts is backed by the post-holders' membership of the Corporate Management Team. The Constitution also contains a Statutory Officers Protocol.
- 3.6 During 2018/19 the following amendment to the Constitution has been made:

The Council has adopted a procedure requiring notice to be given in advance of amendments to be moved at full Council meetings.

- 3.7 In 2016 CIPFA published its Statement on the Role of the Chief Financial Officer in local government, setting out core principles and standards relating to the role of CFO and how it fits into the organisation's governance arrangements. The Council complied with the CIPFA statement in 2018/19.
- 3.8 In 2019 CIPFA published its Statement on the Role of the Head of Internal Audit, setting out core principles and standards relating to the role of the Head of Internal Audit and how it fits into the organisation's governance arrangements. The Council complied with the CIPFA statement in 2018/19
- 3.9 The primary counterbalance to the Executive is the Scrutiny Committee. The role of this committee is to provide a robust challenge to the Cabinet. A Memorandum of Understanding has been developed to set out the relationship between the scrutiny and executive functions to address some of the recommendations from the Centre for Public Scrutiny review of the council's scrutiny processes and practices. This MoU was approved by Scrutiny Committee and by Cabinet, through an executive decision, in March 2019. It follows recommended practice and will assist in ensuring the two functions work effectively together.
- 3.10 The Governance, Audit & Performance Committee monitors the performance of the Council, fulfilling the Council's Audit Committee core functions, as identified in Audit Committees: Practical Guidance for Local Authorities and Police (CIPFA 2016), in respect of External Audit, Internal Audit and Risk Management and Performance Management. The Committee can, and does, request assurance from the relevant Cabinet member and/or senior manager when there is consistent underperformance in a particular service area/indicator.
- 3.11 The Council has a formal complaints procedure which allows the public or other stakeholders to make a complaint regarding the service received from the Council or on the conduct of Members. The Standards Committee has responsibility for overseeing the investigation of complaints against members.
- For the period 01/04/18 to 31/03/19, there were 16 allegations received of a breach of the Code of Conduct, of which
11 were against parish councillors;
5 were against district councillors.
- 3.12 The Council has policies to protect both itself and its staff when making decisions. A Counter Fraud and Corruption Strategy and Policies have been developed in accordance with the Code of Practices on Managing the Risk of Fraud and Corruption (CIPFA 2014), and include the Council's Fraud Response Plan, Whistleblowing and Bribery Act 2010 Policies which have been developed and communicated to all staff via the internet and as part of the Induction process. The Counter Fraud and Corruption Strategy and Policies have been reviewed, updated and published during 2018/19.

- 3.13 The Council has embedded Risk Management throughout its activities with the Corporate Risk Register reflecting the key threats to achieving its corporate aims and objectives. The Council's Corporate Risk Register is reviewed and updated by CMT and reported twice a year to the Governance, Audit and Performance Committee.
- 3.14 Performance Management is monitored through quarterly reporting to CMT and the Governance, Audit and Performance Committee on 16 Key Performance Indicators and more than 20 other PIs. Areas of concern are discussed by the Committee and follow-up reports are requested if necessary. Of particular concern in 2018/19 was the re-let time for void properties.
- 3.15 All Council services are delivered by trained and experienced officers. Job Descriptions and Person Specifications are in place for all posts to ensure that the best candidates are appointed into each position. A significant commitment has also been made towards retaining good staff, by offering numerous 'work friendly' schemes and where possible encouraging succession planning and promotion from within. This ensures that valuable skills and experience are retained and passed on, rather than being lost. Training needs are identified through the U-Perform appraisal system, including ILM training for supervisors and managers.
- 3.16 The individual performance review system known as U-Perform has been operated in the council for nine years. Staff are measured against operational objectives that are linked through to service plans and the Corporate Plan and are also provided with behaviour statements against which they can demonstrate how they go about their roles. U-Perform also identifies developmental and training needs, through which training is made available to staff to ensure that individuals are able to undertake their present role effectively. In 2018/19 the Council achieved a 100 per cent completion rate for U-Perform for the second year running. Also in 2018/19, the council moved the U-Perform system online via the iTrent HR platform and introduced a new paper-based system for manual staff. A moderation process was established in 2017/18, through which the council's Chief Executive and Directors review U-Perform ratings for all staff to ensure consistency across all departments in the way the system is applied and this process was further improved for 2018/19.
- 3.17 During the year 2018/19 specific training for Members of the following committees was also arranged: Standards Committee (in-house training covering Standards Hearings) and Planning Committee (in-house training covering Probity in Planning). Online training for all Members of the Council on General Data Protection Regulations and Data Protections Act 2018 was provided through the Local Government Association from May 2018. The monthly Members' Bulletin has provided further information and guidance to Members for example on Cybercrime Training; Photographing of Members and Mileage and Expenses.
- 3.18 The Council continues to ensure it is open and accessible to the community. In 2018/19 it has:
- Continued to regularly survey the views of residents through its Citizens Panel

- Launched a new council website, following Government Digital Service design principles
- Launched a sub-site for business to provide information and support to the local economy
- Continued to meet guidelines on the publication of transparency information on its website, including publishing Gender Pay Gap information
- Continued audio streaming and recording of meetings of the Planning Committee, Full Council and Cabinet and, latterly, all committees including the Scrutiny Committee
- Conducted a major consultation exercise for the Local Council Tax Support Scheme and budget setting, which attracted the highest ever level of responses
- Established a Public Engagement Working Group, which concluded its work with a series of recommendations to improve community engagement with the council
- Continued to support the Uttlesford Youth Council
- Continued to deliver the Keep Me Posted email news service for residents and grew the subscriber base to in excess of 7,000 people.

All Committee meetings are open to the public except where personal or confidential matters are discussed. All agendas and minutes are placed on-line, along with the Council's policies and strategies. These items are also available by directly contacting the Council. When identifying the priorities and objectives for the Corporate Plan the views of stakeholders and the wider community are sought through a number of consultation mechanisms, and are taken into account. The Corporate Plan is made available to all via the Council's website.

- 3.19 During 2018/19 the Council's Scrutiny Committee has looked at various areas of Council decision making and service delivery, including the draft budget and LCTS scheme and consultation, affordable homes and waste education. In addition, the Centre for Public Scrutiny's report into the council's scrutiny processes and practices was discussed and an action plan agreed. Several key recommendations were put in place during the year, including reports being presented by Cabinet Members rather than officers and the establishment of a Memorandum of Understanding between the executive and scrutiny. A summary of the Committee's work for the year can be found on the agenda of the Full Council meeting of 9 April 2019
- 3.20 There are terms of reference and constitutions set up for key partnerships which ensure that all members of the partnership act lawfully throughout the decision making process. Uttlesford Futures has a comprehensive Governance Handbook and the terms of reference for all of the working groups are regularly reviewed to ensure they comply with the overarching document. Key partnerships include the Local Strategic Partnership - Uttlesford Futures; the Public Law Partnership and the North Essex Parking Partnership. The Council also works closely with neighbouring authorities to promote sustainable economic growth and on strategic planning issues in the context of the duty to cooperate under the Planning Acts. It also works with Braintree and Epping Forest Councils for shared provision of energy efficiency advice, insurance arrangements and building control.

- 3.21 A Corporate Peer Challenge was conducted in November 2016; the report and action plan was approved at Council in July 2017 and update reports on progress against the action plan have been regularly reported to GAP, with the most recent being in October 2018
- 3.22 The Council's Draft Statement of Accounts for 2017/18 was completed by 31 May 2018. The audited Statement of Accounts for 2017/18 was published on 26 July 2018. The Council received an unqualified opinion on its accounts for the tenth successive year.
- 3.23 During 2018/19 work has continued on the development of the council's new HR and Payroll system. Phase 2 of the project, which includes appraisals and online recruitment, went live during the year.
- 3.24 On 15 May 2017, Aspire (CRP) Ltd (a wholly owned company of the council) purchased a 50% share in Chesterford Research Park (which is part of the South Cambridgeshire Biotech Cluster) in a joint venture with Aviva Ltd. The company has three Directors all of which are council employees and are members of the Corporate Management Team. The company also engages the services of two Non-Executive Directors to complement the skills of the directors in determining the company's activities, which are the subject of audit processes separate to the council. Members of the Cabinet form the shareholder board. The Council resolved to fund 50% of the refurbishment and refit costs of Newnham Building and this work commenced in early 2019. The expected completion date is summer 2020.
- 3.25 The GDPR project has been completed and arrangements are in place to ensure ongoing compliance with GDPR. Attention is being moved to wider aspects of information governance
- 3.26 During the autumn of 2018 it became clear that the risks to the Council, businesses and the community of Uttlesford of a no-deal exit from the European Union were such that the risk should be added to the corporate risk register (November Governance Audit and Performance Committee) and additional resources were allocated to the preparations for such a scenario. Bids were made to government for additional funding to provide for preparations; the council received £16k from the FSA and £35k from the DCLG. This was in addition to funding allocated to all local authorities in recognition of their preparations. Additional training was undertaken by command staff and officers participated in an Essex wide strategic command exercise.

4 REVIEW OF EFFECTIVENESS

- 4.1 Uttlesford District Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the executive managers within the authority who have 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.

- 4.2 The Council's Monitoring Officer has responsibility for overseeing the implementation and monitoring the operation of the Code of Corporate Governance, maintaining and updating the Code in the light of latest guidance on best practice, considering any changes that may be necessary to maintain it and ensure its effectiveness in practice. All reports to Cabinet, Committees and Council are seen by the Monitoring Officer to ensure compliance with legal requirements.
- 4.3 The Council's Section 151 Officer has responsibility for the proper administration of the Council's financial affairs. This includes responsibility for maintaining and reviewing Financial Regulations to ensure they remain fit for purpose, and submitting any additions or changes necessary to the full Council for approval. The Section 151 Officer is also responsible for reporting, where appropriate, breaches of the Regulations to the Cabinet and/or the Council. All reports to Cabinet, Committees and Council are seen by the Section 151 Officer to ensure compliance with financial requirements.
- 4.4 The Council's Internal Audit Service, via a specific responsibility assigned to the Internal Audit Manager, is required to provide an annual independent and objective opinion to the Authority on its risk management, governance and control environment. The Internal Audit Manager's Annual Report and Opinion for 2018/19 concluded that the audit opinion on the control environment for 2018/19 is that risks material to the achievement of the objectives for the audited areas identified by Internal Audit were, on balance, satisfactorily managed and controlled.
- 4.5 Twenty-two Audits from the 2018/19 Internal Audit Programme have been completed. Of these, three audits were given an Internal Audit opinion of either Little or Limited Assurance:
- The Audit of Corporate Equality and Diversity was given the opinion of Little Assurance. Nine recommendations were made - eight level 3 and one level 2; one recommendation has been implemented, the remaining recommendations are expected to be implemented by their agreed due dates in 2019/20.
 - The Audit of Environmental Health Enforcement was given the opinion of Limited Assurance. Five recommendations were made – four level 3 and one level 2; three recommendations have been implemented, the remaining recommendations are expected to be implemented by their agreed due dates in 2019/20
 - The Audit of Housing – Planned Maintenance was given the opinion of Limited Assurance. Three recommendations were made – one level 4 and two level 3; one recommendation has been implemented, the remaining recommendations are expected to be implemented by their agreed due dates in 2019/20

- 4.6 In addition to the above, the Council has conducted a formal review of its internal control environment and collated evidence and assurance from a variety of sources. This has included the collation of assurances from all Senior Management Team (SMT) members on the effectiveness of the internal control environment. A review of the returns concluded that based on this self-assessment, effective controls were in place.
- 4.7 The work of the Council's Internal Audit is governed by the UK Public Sector Internal Audit Standards (PSIAS) 2017. The PSIAS encompass the mandatory elements of the Institute of Internal Auditors (IIA) International Professional Practices Framework (IPPF), additional requirements and interpretations for the UK public sector have been inserted in such a way as to preserve the integrity of the text of the mandatory elements of the IPPF. The PSIAS are mandatory for all internal auditors working in the UK public sector. An External Quality Assessment of the performance of Internal Audit and its conformance with the PSIAS was undertaken in September 2017. An essential element of this assessment was to ensure that the annual audit opinion issued by Internal Audit may be relied upon as a key source of evidence and assurance. The External Assessment concluded that the Internal Audit service generally conforms with the expectations of the PSIAS and made 15 recommendations to reflect that there are areas in which the service can be further improved and enhanced. Lack of resource has resulted in implementation of only 3 recommendations during 2018/19, the service will be working to implement the remaining recommendations during 2019/20.
- 4.8 The Council's Performance Management Framework through which the quality of service can be measured by performance indicators. Most indicators are monitored on a quarterly basis; some are bi-annual or annual. All are discussed by the Corporate Management Team and the top two of three layers of indicators are reported to Committee.
- 4.9 EY were appointed as the Council's External Auditor from 01 September 2012 and were responsible for reviewing the Council's Statements of Accounts. In addition to reviewing the 2017/18 Statement of Accounts, EY issued a formal opinion on the Council's arrangements for securing Value for Money concluding that the council had made appropriate arrangements to secure economy, efficiency and effectiveness in its use of resources. This was the final year of EY's appointment as our External Auditors.
- 4.10 Public Sector Audit Appointments (PSAA) is specified as an appointing person under the provisions of the Local Audit and Accountability Act 2014 and regulation 3 of the Local Audit (Appointing Person) Regulations 2015. For audits of the accounts from 2018/19, PSAA appoints an auditor to relevant principal local government authorities that have opted into its national scheme. Appointments are made for the duration of a five-year appointing period. The current appointing period covers the audits of the accounts for 2018/19 to 2022/23.
- 4.11 In December 2017 BDO LLP were confirmed by PSAA as the Council's new External Auditors for the period 2018/19 to 2022/23

5 SIGNIFICANT GOVERNANCE ISSUES**5.1 Significant Issues from 2017/18**

In the 2017/18 Annual Governance Statement the following three issues were identified:

- 1 The revision of the Code of Corporate Governance has not been completed; this has been included as a Significant Control Issue identified in 2017/18

Good progress is being made with a fundamental review and redraft of the Code of Corporate Governance. The new version will be submitted for member approval in the first part of 2019/20.

- 2 Significant control weaknesses were identified by Internal Audit in the Trade Waste Service. Significant work has been undertaken within the service to ensure the implementation of the recommendations. Internal Audit will undertake further audit work to complete the audit in 2018/19.

In July 2018, Internal Audit carried out follow-up work to confirm the implementation of the recommendations made and in June 2019 completed the required testing of the controls now in place. The final Audit report was issued with a satisfactory opinion given.

- 3 Homes England has drawn the Council's attention to non-compliance with the Capital Funding Guide (CFG) and has made a recommendation that the Council update and improve internal processes to ensure compliance to the CGF and send evidence of this to Homes England by 01 August 2018, (this is subject to further discussions with Homes England).

The final grade received in a report from Homes England demonstrated a failure by the Council to meet the requirements of the Homes England Capital Funding Guide for the development at Reynolds Court. The report from Homes England confirmed that there were no other breaches in the administration of this development. The breach was awarded to the Council on the basis that the start on site claim was made in advance of the main contract being signed. The report acknowledged that eligible works had commenced, possession of the site had been achieved and that the provider was incurring eligible costs. Works were commenced under a Pre-Construction Services Agreement which was signed on the 15th December 2015, well before the first grant claim. Officers have liaised with Homes England to agree procedures for any future grant applications. The council has changed internal procedures to ensure that a re-forecast of the start on site milestone is requested from Homes England, in order to correspond with the execution date of the main build contract, on all future schemes. This will ensure that no start on site claim is requested prior to the execution date of the main build contract. This approach has been signed off by Homes England. It has also been signed off by the Portfolio for Housing and the Council's Corporate Management Team.

5.2 Actions Identified for 2017/18

In the 2017/18 Annual Governance Statement the following five actions were identified for 2018/19:

- 1 Publication of the revised and update Counter Fraud Strategy and Policies

The Counter Fraud Strategy and Policies were revised and updated and approved for publication in March 2019

- 2 Publication of a Code of Conduct for Staff and a revised Register of Interests (in line with the Internal Audit Recommendation made following the Audit of Corporate Governance)

A Code of Conduct for staff has been drafted and this is expected to be published in the first part of 2019/20.

Work on a register of interests for staff will be undertaken in 2019/20

- 3 Completion of the GDPR Project and establishment of the processes and procedures required to ensure ongoing compliance with GDPR and the new Data Protection Act 2018

The GDPR project has been completed and arrangements are in place to ensure ongoing compliance with GDPR. Attention is being moved to wider aspects of information governance

- 4 The completion of the review and update of the Code of Corporate Governance

Good progress is being made with a fundamental review and redraft of the Code of Corporate Governance. The new version will be submitted for member approval in the first part of 2019/20.

- 5 Implementation of recommendations from

- the review of Scrutiny

Recommendations from the Centre for Public Scrutiny review of the council's scrutiny processes and practices have been put in place during 2018/19, including the establishment of a Memorandum of Understanding between the executive and scrutiny functions, which incorporates multiple recommendations in a single document.

- the Peer reviews of
 - Electoral Services

The Association of Electoral Administrators (AEA) was engaged to undertake a peer review of the council's electoral services, ahead of the planned retirement of the long-standing experienced manager. Their identified a number of strengths within the service and made six recommendations, of which four have been implemented. The other two remain outstanding as they need to be implemented at a time of electoral stability.
 - Licensing

In 2018/19 the council undertook a comprehensive review of the licensing system at Uttlesford District Council primarily focusing on Hackney carriage vehicles and PHV, including operator, driver and vehicle licences and the standards and conditions that govern them.

The review identified both strengths and weaknesses within the service and made recommendations for improvement to the delivery and efficiency of service and its interaction with its customers as well as changes to policies and procedures which were found to be outdated and in need of a fundamental review. Safeguarding was highlighted as a potential issue as the council has over 2,000 drivers predominantly on School contract work which puts potentially vulnerable people totally under the control of the driver.

Following the review new policies and procedures have been put in place. These were widely consulted on before being approved by Committee and Full Council. The authority is confident that the new measures it has put in place will ensure that vehicles are safe and that drivers and operators are fit and proper to hold such licences
 - Planning

The Planning Peer Review was undertaken by the Planning Officers' Society in February 2018. The Review highlighted many strengths in the way we work but has indicated that if we are to provide the excellent planning service we aspire to, we need to improve our performance levels relating to the Government's key criteria. We are currently in the lower quartile's for performance targets relating to major and non-major planning applications. This is a service wide issue – not one just for development management to address as other teams such as Conservation, Landscape, Economic Development and Planning Policy need to feed into the planning application decision-making processes in a more timely, efficient and effective way.

A Peer Review Action Plan covering all service areas has been developed and is in the process of being implemented. This needs a renewed focus on hitting the agreed targets and objectives so that the service improves across the department. A key element of this will be giving managers the time and space to manage instead of them getting too involved in detailed issues that can be dealt with by officers in their teams. This in turn, will require managers to delegate more decision-making and allow officers to make informed, professional decisions themselves based on their own experience and skills.

- The Ombudsman regarding training for Senior Managers in the handling of complaints
12 staff attended training provided by the Local Government Ombudsman regarding effective handling of complaints, primarily focused on dealing with complaints effectively at the first stage. The council's policy on complaints has subsequently been updated, in part to reflect the best practice shared at the training. In addition, the responsibility of coordinating the council's responses to complaints raised with the LGO has been taken on by the Executive Support team who have reviewed the collation and management of information, which has received very positive feedback from the LGO.

5.3 Significant Control and Governance Issues identified 2018/19

Equality & Diversity

The Audit of Corporate Equality and Diversity identified significant issues that needed to be addressed to improve governance, monitoring reporting and compliance to equality legislation. This was reported to GAP in November 2018. Resources have been identified to implement the recommendations made and further updates on progress will be given to GAP during 2019/20.

- 5.4 It is proposed over the coming year to take steps 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 the review of effectiveness and will monitor their implementation and operation as part of our next annual review.

The Council considers its Corporate Governance and Internal Control arrangements to be fundamentally sound.

Signed: _____

Dawn French
Chief Executive

Signed: _____

John Lodge
Leader of the Council