# Framework Schedule 6 (Direct Award short order form template and Call-Off Schedules)

# **Order Form**

CALL-OFF REFERENCE: C1348

DESCRIPTION: Position of Chief Executive Officer (SCS2) for the

Public Sector Fraud Authority (PSFA) in the Cabinet Office

THE BUYER: Cabinet Office

BUYER ADDRESS 1 Horse Guards, London SW1A 2HQ

THE SUPPLIER: IRG Advisors LLP (T/A ODGERS BERNDTSON)

SUPPLIER ADDRESS: 18-20 Cannon Street, London C4M 6XD

REGISTRATION NUMBER: REDACTED TEXT under FOIA Section

**40**, Personal Information

DUNS NUMBER: REDACTED TEXT under FOIA Section 40, Personal

Information

SID4GOV ID: REDACTED TEXT under FOIA Section 40, Personal

Information

This Order Form, when completed and executed by both Parties, forms a Call-Off Contract. A Call-Off Contract can be completed and executed using an equivalent document or electronic purchase order system.

## APPLICABLE FRAMEWORK CONTRACT

This Order Form is for the provision of the Call-Off Deliverables and dated 3 January 2023.

It's issued under the Framework Contract with the reference number RM6290 for the provision of Executive & Non-Executive Recruitment Services.

# **CALL-OFF LOT:**

Lot 1 Executive Search – Grade 6, SCS1 & SCS2 (and equivalents).

## **CALL-OFF INCORPORATED TERMS**

The following documents are incorporated into this Call-Off Contract. Where numbers are missing we are not using those schedules. If the documents conflict, the following order of precedence applies:

- 1. This Order Form
- 2. Joint Schedule 1(Definitions and Interpretation)
- 3. The following Schedules in equal order of precedence:

# Joint Schedules

- Joint Schedule 2 (Variation Form)
- Joint Schedule 3 (Insurance Requirements)
- Joint Schedule 4 (Commercially Sensitive Information)
- Joint Schedule 6 (Key Subcontractors)
- Joint Schedule 7 (Financial Difficulties)
- Joint Schedule 8 (Guarantee)
- Joint Schedule 9 (Minimum Standards of Reliability)
- Joint Schedule 10 (Rectification Plan)
- Joint Schedule 11 (Processing Data)
- Joint Schedule 12 (Supply Chain Visibility)

# • Call-Off Schedules

- Call-Off Schedule 1 (Transparency Reports)
- o Call-Off Schedule 2 (Staff Transfer)
- Call-Off Schedule 3 (Continuous Improvement)
- Call-Off Schedule 5 (Pricing Details)
- o Call-Off Schedule 6 (ICT Services)
- Call-Off Schedule 7 (Key Supplier Staff)
- Call-Off Schedule 8 (Business Continuity and Disaster Recovery)
- Call-Off Schedule 9 (Security)
- Call-Off Schedule 10 (Exit Management)
- Call-Off Schedule 12 (Clustering)
- o Call-Off Schedule 13 (Implementation Plan and Testing)
- Call-Off Schedule 14 (Service Levels)
- o Call-Off Schedule 15 (Call-Off Contract Management)
- Call-Off Schedule 16 (Benchmarking)
- o Call-Off Schedule 20 (Call-Off Specification)
- 4. CCS Core Terms (version 3.0.11)
- 5. Joint Schedule 5 (Corporate Social Responsibility)

No other Supplier terms are part of the Call-Off Contract. That includes any terms written on the back of, added to this Order Form, or presented at the time of delivery.

CALL-OFF START DATE: 3 January 2023

CALL-OFF EXPIRY DATE: 2 July 2023 CALL-OFF CONTRACT PERIOD: 6 Months

#### **GDPR POSITION**

Independent Data Controller

## STATEMENT OF REQUIREMENTS

# 1. Purpose

We are looking to appoint IRG Advisors LLP from Lot 1 of the RM6290 framework to recruit a permanent Chief Executive of the Public Sector Fraud Authority (PSFA).

- The role is at SCS 2 level.
- The role reports to the Chief Operating Officer and Permanent Secretary for the Cabinet Office.
- The role is based in London but can be based in Glasgow, York or Newcastle but there
  would be frequent (weekly) visits to London as well as to the other locations being the
  primary centres of the PSFA.
- This is a senior and critical role requiring a firm that has a track record of recruiting to roles at this level, with a good understanding of the Counter Fraud specialism and good contacts within the specialism.

## 2. The search firm is required to undertake the following;

#### **PLANNING AND LAUNCH**

- Attend a planning meeting chaired by a Civil Service Commissioner with the vacancy holder in order to advise on:
  - Job description, person specification, location and salary as well as noting panel membership and security clearance requirements.
  - o Designing a process, campaign literature and advertising strategy.
  - Proposed search strategy and suggested timetable.
  - Your plan to achieve a diverse field; including the specific challenges within the target profession / counter fraud sector and how to mitigate them and to report back finding where diversity is an issue and why.
  - Produce final advertising material and launch on external media (internal SCS recruitment team will launch on Civil Service Jobs).

## **SEARCH AND ASSESS**

- Undertake research in line with proposed strategy, approaching and engaging with suitable candidates across the agreed sectors, demonstrating a commitment to providing a diverse field.
- Provide a dedicated contact for enquiries from prospective candidates.
- Provide regular written updates (regularity to be agreed at planning) on the progress of the search including market insights, profiles of potentially interested parties and feedback from a selection of those that have declined to apply.
- Attend a mid-search progress review meeting with key stakeholders.
- Immediately after the vacancy has closed, provide the Cabinet Office and HM Treasury stakeholders with a comprehensive list of applicants, highlighting the source of those applicants and identifying individuals generated proactively through search efforts.
- Identify salary expectations from potential candidates.
- use the technical questions provided to assess the candidate's suitability to be considered a technical expert.

#### LONGLIST:

- Attendance at longlist meeting as agreed at planning, with the selection panel chaired by a civil service Commissioner at which you will present recommendations from your longlist - with candidates graded A, B, C (A = recommended, B = marginal or C= not recommended)
- Longlist pack should include:
  - CV and Supporting Statement of each applicant.
  - Summary of each candidate's performance aligned to their grade.
- Based on outcome of longlist meeting: conduct longlist interviews with shortlisted candidates based on Vacancy holders and Commissioners feedback and questions.
- Produce 1 to 2 pages written report on longlist interview which will form part of the shortlist pack.

#### **SELECTION** (core shortlisting stage)

- Attendance at shortlist meeting as agreed at planning, with the selection panel chaired by a civil service Commissioner at which you will present recommendations from your longlisting interviews.
- Provide the panel and the Cabinet Office recruitment team with a 'sift pack' which includes:
  - CV and Supporting Statement of each applicant
  - The written report on candidates that have been longlist interviewed
  - A sift sheet with each candidate graded A = recommended, B = marginal or C= not recommended
- Support the Cabinet Office SCS recruitment team, where necessary, on the coordination of any pre-agreed assessment processes, for example coordination of attendance at the Individual Leadership Assessment and scheduling of Psychometrics, Aptitude, Counter Fraud and Staff Engagement and other assessment activities.
- Capturing availability of candidates for Fire side chat with Ministers and senior Cabinet Office/HM Treasury officials.
- Arrange final panel interviews, preparing candidates and providing all of the materials that
  they require for the day. Provide a final interview pack in conjunction with Cabinet Office
  recruitment that contains all of the relevant documents pertaining to the candidates being
  interviewed.
- Work with Cabinet Office SCS recruitment team on offer negotiation and the provision of feedback to unsuccessful candidates.

## **CANDIDATE MANAGEMENT & COMMUNICATION**

- You are required to offer feedback to all candidates unsuccessful at longlist, shortlist and final interview stage
- You are required to meet the following SLAs:
  - Availability All enquiries from the Contracting Authority are to be fully answered within 2 working days of receipt.
  - Complaints Handling Any formal complaints from candidates to be acknowledged within 2 working days of receipt. All complaints handling procedures must be made clear in the published campaign literature.
  - Candidate management Supplier to manage all candidate interest throughout the search/advertising period, with all enquiries being resolved prior to closing date.

# 3. BACKGROUND TO THE CEO ROLE

In the Spring Statement of March 2022, the Chancellor announced the creation of a new Public Sector Fraud Authority (PSFA) reporting to Cabinet Office and HM Treasury. This is a major government initiative to turn the tide on public sector fraud, drive efficiency, ensure taxpayer money is better spent and contribute to the wider effort on reducing economic crime in the UK.

The PSFA was launched on 3 August 2022, replacing the Government Counter Fraud Function, and is currently led by an interim Chief Executive while a recruitment campaign is launched for a permanent successor.

The CEO is responsible for leading the PSFA and government's wider response to public sector fraud e.g. working with departments, public bodies and the counter fraud industry to understand the loss and threat from fraud, set out what is the targeted level of fraud and error loss should be, and assess how the government is performing against these metrics. The CEO will be accountable for creating a system where the government's response to fraud, across the 16,000 public servants who work in this area, is increasingly modernised and continuously improving - using better tools, techniques and capabilities to have an increasing impact on the multi-billion pound loss.

The PSFA is a completely new structure, and the CEO will be expected to build upon the mobilisation phase, establish the organisations and their own authority and place within government during its infancy, and set the PSFA's direction going forward.

The PSFA's mission is to:

- Modernise the fraud and error response by widening access, and use of, leading practices, tools and technology better protecting tax-payers money.
- Build expert-led services that collaborate with experts in departments and public bodies to better fight fraud and error through risk, prevention, data and enforcement techniques.
- Develop capability in the public sector to find, prevent and respond to fraud and error both organisationally and individually.
- Put performance at the heart of the public sector fraud conversation focusing on investments and outcomes.
- Be seen as a beacon of fraud and error expertise and a destination for those wanting to make a difference in fighting public sector fraud.

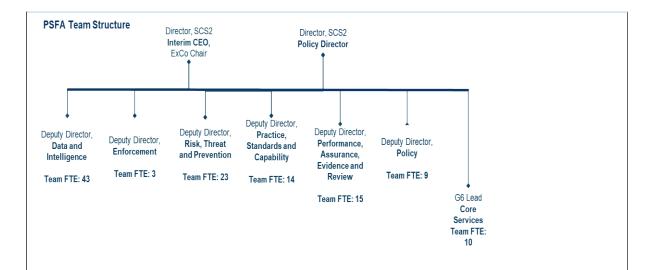
It will act as the centre of the Function, and continue to work with experts across government and internationally, and wider sectors, to build standards and the Counter Fraud Profession.

The CEO is the figurehead of this new organisation. The CEO will be the expert voice that, supported by other experts in the Advisory Panel, the Executive Committee and the SCS Functional leads in departments, will be the definitive voice on the level of fraud risk, threat and loss, the level of performance in dealing with this and the direction of travel for countering fraud against the public sector. The CEO will be responsible for ensuring that structures are built to assess the quality of counter fraud work and will be accountable for the creation and performance of specialist services to support departments and public bodies that will have measured and auditable outcomes.

# 4. Overview of Role Requirements and Scope

The PSFA has a budget of £16.7m a year, and a headcount of over 150, with a leadership role over the 16,000 public servants working to fight fraud in central government. There will be seven key workstreams, each led by a Senior Civil Servant (and member of the Executive Committee).

Although the size and structure of the PSFA is being finalised as part of wider CO2025 planning, the below organogram sets out the planned organisational structure.



The CEO will be responsible for the good management of the budget and up to 150 FTE within the PSFA, the majority of which will be Fraud Professionals.

In addition, as Head of Profession and Function, the CEO will have a dotted line into each SCS lead in all departments and input into both the recruitment of these individuals and their performance assessment. Currently there are around 16k people in total with around 15 SCS. The number of functional leads, and SCS, is due to grow once the Functional Leadership Development Programme is delivered.

As part of direct management the CEO will line-manage one SCS2.

The CEO will lead teams located in various Hubs across the UK with Glasgow, York, Newcastle and London being the primary centres of the PSFA, with other staff located in Manchester. There is also a key team working at home- the National Fraud Initiative which provides services to local and central government. Over 50% of the PSFA workforce will be based outside of London, and there will be a requirement of the CEO to ensure that the organisation works cohesively across these different locations.

The direct, up-close and personal accountability of this role speaks to the heart of Government. It will have a triple line: first in to the Minister for Cabinet Office, where they will be reporting direct, and where they and their SCS will send frequent (almost daily) briefings, updates and advice; second to the Chief Operating Officer for Government and Permanent Secretary for the Cabinet office who will act as direct line manager; and third through the joint operating board and Efficiency and Value for Money Committee this role is accountable to HMT Permanent Secretary and the Chancellor.

Ultimate Accountability of Counter Fraud risk remains with the department and public bodies Accounting Officers; however, the PSFA will be accountable for:

- direct savings made as an outcome of Expert Services (prevention, intelligence, enforcement, etc.) For 22/23 the public target is £180m.
- O quality of advice / expertise / guidance provided to Accounting Officers.
- quality and effectiveness of Functional / Professional Standards in enabling Accounting Officers to achieve their target outcomes.

This role is accountable directly to Parliament giving evidence to the various select committees including the PAC- where they will provide direct evidence as the lead on Public Sector Fraud, but also ad hoc appearances at select committees looking at any scheme or department where fraud is an issue. This is likely to be a significant part of the role as Fraud in the public sector has taken on a very public persona - for instance with Bounce Back loans, which is one scheme that has been

the subject of at least 6 committee meetings in the last 6 months. With a CEO in place, the demand for this role to be leading in public and providing evidence and intelligence will increase.

The CEO will chair the PSFA's Executive Committee and be involved in appointing members of the Advisory Panel, which will be made up of recognised experts on fraud management from different sectors who support the PSFA's leadership team.

The CEO role requires a person who can exercise all at once; the advice of a technical expert, while assessing and analysing the political situation - nationally and Internationally - and the pragmatic view of a delivery expert who's opinion could lead to major changes in government policy and practice alongside a deep expertise in transformation across multiple, complex organisations with a high degree of independence. All of this will be carried out in the public gaze.

Although the CEO role does not have authority to make decisions on other OGDs schemes - either budgets or whether to stop scheme - the PSFA CEO will engage with Senior Leaders across government to advise them on practices to minimise fraud. Especially in departments with exposure to high levels of fraud - DWP and HMRC - this will involve briefing and advising Permanent Secretaries on what suitable course of actions are. By directly reporting into the Permanent Secretary of the Cabinet Office, and integration within the finance function in HMT, the CEO will be able to use their central mandate to influence the decisions taken by senior stakeholders across government on their schemes.

The PSFA CEO will use best in-class data analytics, deep fraud expertise, and its Ministerial Mandate to advise Accounting Officers, to support their decision making. Evidence and recommendations provided by the PSFA CEO will influence the decisions made by Senior Leaders and Accounting Officers across government.

This role has to first get over all these hurdles- persuade and negotiate with permanent secretaries, finance directors and chief operating officers to increase capability and capacity for countering fraud in a system that doesn't reward you for doing this- even to the extent it's easier to lose the money and show value in getting it back even though that's more expensive and less fruitful than prevention.

The easy route to achieving buy-in is to expose failure, however, that route only works short term and once. To really change minds and develop a workable strategy that will deliver in future years it needs the person in this role to persuade politicians and permanent secretaries to act against the grain to see finding fraud as good- and worry where fraud is not found. One of the key roles here will be to have some authority and use it sparingly so that it really lands in the wider community when used. To start to arrive at a new funding model to fund this service and overcome all the obstacles set out above. This will need key negotiating skills as it will be the first new funding model of its type.

The CEO will be an Internationally recognised expert in fraud. This may include professional post graduate qualifications, but it is more likely to be seen through extensive experience in the counter fraud industry, published papers on fraud, and/or a list of appearances at recognised conferences.

The CEO will be required to have considerable experience working at a senior level, to develop the expertise and recognised standard to take on such a publicly recognised role. Given the senior governance structure associated with the PSFA, and the expectation of the CEO to chair the Executive Committee, it would be expected that the individual possesses board level experience in a major organisation.

This is a public-facing role, engaging with external agencies and industry, it would be expected that the person would have provided evidence or opinion in person or in print to the public.

With reducing public sector fraud being a major government priority, it would be expected that the CEO has experience working in a high octane, fast paced public role or a role open to public scrutiny.

Proven ability to quickly analyse situations and information and to brief ministers and senior leaders - sometimes at incredibly short notice- e.g. parliamentary questions- or press enquiries.

The role requires a media savvy person who can confidently speak on behalf of the UK Government on public sector fraud in public, in the media, in front of parliament, and to other governments.

#### 5. COMPLIANCE

The Supplier must adhere to the Civil Service Recruitment Principles to ensure all recruitment is Fair and Open and in Merit order.

This role will be chaired by a Civil Service Commissioner, the Supplier must work alongside the Commissioner to ensure the recruitment is compliant.

The Supplier must ensure conflicts of interests are understood and managed effectively.

#### 6. KEY MILESTONES & DELIVERABLES

- Attend a planning meeting with key stakeholders, chaired by a Civil Service Commissioner within 1 week of being awarded.
- Undertake initial scoping work/research and recruitment materials in time to go live within two weeks of the planning meeting.
- Prepare and deliver weekly update reports detailing who has been contacted, how the role is being received in the market, receive feedback and outline upcoming calls and work planned
- To promptly deal with all candidate enquiries.
- Collate and sift all applications received graded A (recommended) B (hold) and C (not recommended) with a narrative presented to the panel prior to a sift meeting.

# 7. MANAGEMENT INFORMATION/REPORTING

The Supplier will provide a full report for longlisted and shortlisted candidates including diversity information (gender, ethnicity, religion, age, sexuality, disability and socio-economic background data) where possible.

#### 8. SUSTAINABILITY

The Supplier should consider sustainability, including being paperless

#### 9. QUALITY

It is important that the Supplier meets the security standards outlined in section 11 of this document.

It is important that confidentiality is adhered to, with respect to certain roles.

It is crucial that the Supplier adheres to the Civil Service Commissioners Recruitment Principles, and ensures that all recruitment is fair, open and merit-based and that salary offered is in line with the Principles.

## 10. STAFF AND CUSTOMER SERVICE

The Supplier shall provide a sufficient level of resource throughout the duration of the Contract in order to consistently deliver a quality service.

The Supplier's staff assigned to the Contract shall have the relevant qualifications and experience to deliver the Contract to the required standard.

The Supplier shall ensure that staff understand the Public Sector Fraud Authority's mandate, mission, values, governance and objectives and will provide excellent customer service to the Contracting Authority throughout the duration of the Contract.

All staff on the search team will have experience of sourcing and placing senior procurement talent into senior public sector roles.

## 11. SERVICE LEVELS AND PERFORMANCE

The Cabinet Office will measure the quality of the Supplier's delivery by meeting with the Supplier on a weekly basis to review the contract and by evaluating candidate pipeline data.

The Supplier will ensure that the services are of a consistently high quality and meet the requirements of the Customer.

The Supplier shall provide a proactive service manager to ensure that all Service Levels and Key Performance Indicators are achieved to the highest standard throughout the contract period.

Where the Supplier fails to meet the targets for a longlist, at the relevant calibre detailed on the job description, we reserve the right to terminate the contract.

Where the Supplier fails to meet the targets for a shortlist, at the relevant calibre detailed on the job description, the Supplier agrees to undertake a re-run at no additional cost.

## 12. SECURITY AND CONFIDENTIALITY REQUIREMENTS

The Supplier shall ensure that the implementation of security controls and how they shall comply with the HMG Security Policy Framework, as detailed at the link below and Industry best practice,

is documented, with associated security policies and standards: <a href="https://www.gov.uk/government/publications/security-policy-framework">https://www.gov.uk/government/publications/security-policy-framework</a>.

Any IT systems used by the Supplier to meet the Authority's requirement shall have a Cyber Essentials Scheme Basic Certificate or equivalent at the commencement date of the contract and maintain that certification throughout the life of the contract. Cyber Essential Scheme requirements can be located at: https://www.cyberessentials.ncsc.gov.uk/advice/.

Any IT systems used by the Supplier to meet the Authority's requirement must be subjected to periodic independent <u>penetration testing</u> and any significant vulnerabilities identified as part of the <u>penetration testing</u> must be remediated within timeframes agreed with the Authority.

The Supplier shall have the capability to employ encryption to information / Data which shall be sent across a network or extracted by electronic means. Where encryption is used the method of encryption used must be agreed with, and meet the requirements of, the Contracting Authority.

The Supplier shall ensure that any suspected or actual security breaches are reported to Cabinet Office representative immediately and depending on the impact of the breach, shall be included in monthly/quarterly performance reporting to the Authority.

The Supplier shall comply with all relevant legislation, organisational and cross Government policy and guidelines in relation to Data and asset security.

The Supplier (and any sub-contractor that provides any part of the Supplier service) shall provide secure solutions that comply with any restrictions or requirements arising out of the Contracting Authority's security policies. This shall include, but not be limited to:

Cyber Essentials Scheme Basic Certificate; BS EN ISO 9001 or agreed equivalent; ISO 27001 Information Security Management or agreed equivalent; and HMG Baseline Personnel Security Standard

The Supplier shall ensure that Contracting Authority's information and Data (electronic and physical) shall be collected, held and maintained in a secure and confidential manner and in accordance with the Terms of this Contract.

The Supplier shall take all measures reasonably necessary to ensure that all Supplier Personnel involved in the performance of the Contract are aware of all ongoing Data security and confidentiality requirements.

The Supplier should be able to securely store/retain the application data of all applicants (including those who were unsuccessful) for a period of two years. After that time, the Supplier will be expected to delete/destroy the data using methods which comply with <a href="NCSC">NCSC's guidance on secure sanitisation of storage media.</a>

This paragraph describes the mandatory security vetting / clearance requirements that the Supplier shall fulfil in its entirety as part of the delivery of this Framework Agreement, in line with the Cabinet Office Security Policy Framework (SPF). Full details of the Cabinet Office SPF can be viewed via the link below:

https://www.gov.uk/government/collections/government-security

The Supplier shall have in place security clearance, which meets the requirements of the Contracting Authority, and shall ensure full compliance with the standards set out in the following link:

https://www.gov.uk/government/publications/hmg-personnel-security-controls

Any pre-employment checks that the Supplier subjects their staff to should be at least equivalent to the <u>Government Baseline Personnel Security Standard</u> (BPSS). In addition, where there is a requirement for any Supplier staff to work unsupervised on Authority premises, they will be expected to undergo BPSS checks and National Security Vetting to <u>Counter Terrorism Check</u> (CTC) level before they can do so.

Where a Supplier delivers all or part of the Service from the Contracting Authority's site, the Supplier shall comply with the Contracting Authority's personnel and physical security requirements.

The Supplier shall maintain appropriate staff records for all Supplier Personnel who are involved in activities related to delivery of the products and services within the scope of this this Framework Agreement, and shall make this data available to Contracting Authorities upon request.

The Supplier shall ensure that all employees and key representatives of the Supplier working on the Contract shall comply with the Contracting Authority's security clearance requirements.

The Supplier shall ensure that Supplier Personnel provide evidence of their Right to Work in the United Kingdom in line with the Immigration, Asylum and Nationality Act (2006) and the Supplier shall maintain a copy of such evidence. The cost of obtaining any such evidence shall be the responsibility of the Supplier.

The Contracting Authority reserves the right to review its Security Checking procedure throughout the duration of the Framework Agreement and may require all Supplier employees and all Sub Contractors engaged to provide the Services to have obtained either National Security Vetting clearance or a full criminal records disclosure:

The Supplier shall not charge for the costs of the above. The Authority accepts no liability for costs incurred in the process of obtaining such disclosure certification.

The Contracting Authority may perform audits which may include checking compliance with the security requirements above and/or the additional requirements specified by the Contracting Authority and as mandated by HM Government.

## 13. PAYMENT AND INVOICING

Invoices should be submitted at the end of each calendar month for work completed in that month.

The Authority will raise a purchase order for the maximum value of the contract. The Supplier will invoice for each element of the requirement against the purchase order numbers.

Payment can only be made following satisfactory delivery of pre-agreed work.

Before payment can be considered, each invoice must include a detailed elemental breakdown of work completed and the associated costs.

The address to be used for invoices is shown below. Invoices should be sent by email to an email address to be supplied by the Authority.

Payment cannot be made for work still to be done in the future, but can be made for design work or work done towards an overall finished product which is not yet complete.

# MAXIMUM LIABILITY

The limitation of liability for this Call-Off Contract is stated in Clause 11.2 of the Core Terms.

# **CALL-OFF DELIVERABLES**

See Call-Off Deliverable above

# **CALL-OFF CHARGES**

£46K plus VAT plus agreed advertising costs of £1035 plus VAT.

Fee excludes optional in-depth psychometric assessments and couriering of information packs.

# PAYMENT METHOD

25% on placement of advert, 25% at short list, 50% on acceptance of offer by candidate.

# **BUYER'S INVOICE ADDRESS:**

BUYER'S AUTHORISE	D REPRESENTATIVE
Chief of Staff and Head Core Services Public Sector Fraud Aut	
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SUPPLIER'S AUTHORI – Cons	SED REPRESENTATIVE ultant
SUPPLIER'S CONTRA	

**REDACTED TEXT under FOIA Section 40, Personal Information.** 

For and on b	ehalf of the Supplier:	For and on behalf of the Buyer:	
Signature:		Signature:	
Name:		Name:	
Role:	Designated Member	Role:	Head of Commercial Cabinet Office
Date:	3 January 2023	Date:	3 January 2023

**REDACTED TEXT under FOIA Section 40, Personal Information.**