

Corporate Peer Challenge **Purbeck District Council**

14th to 16th March 2016

Feedback Report

1. Executive Summary

Purbeck is a diverse area with complex needs that requires the Council to balance a variety of factors – most noticeably how to support thriving communities through economic growth and adequate housing provision whilst protecting the district's superb natural environment. The Council is very proactive in striving to achieve this and has produced local plans and growth strategies that are respectful of the natural environment. Through this proactive approach the Council has also been successful in developing partnerships and accessing funding to further its aims and generally 'punches above its weight' for a relatively small authority.

Members and officers are extremely knowledgeable about their area and have good contacts with 'grass root' needs through community involvement and contact with town and parish councils. All those spoken to had a real sense of pride and passion about Purbeck. This detailed knowledge has allowed the Council to develop a clear vision and a straightforward Corporate Strategy that contains its targets grouped into five key priorities. These are set out clearly and in simple terms, although some further articulation of measurable detailed targets under the Corporate Strategy itself would be helpful. The Council should also ensure that it is devoting sufficient resources to supporting its priorities of housing and economic growth.

Internally the Council is managed in a business like and prudent manner. There is an open and inclusive leadership style from the highest levels. All members are encouraged to participate in Policy Group discussions and other forums. The full Council itself acts as the Executive for the authority. Staff are well motivated and view the Council as a good place to work despite recent resource pressures. These pressures are beginning to give rise to some signs of strain and weakened resilience. The Council should consider how it can support staff further during the additional pressures that are to come. It should also examine how it can maximise its use of its middle managers to enhance their involvement and utilise the full potential of this resource.

There is proactive management of the Council's finances and control of spending which has served the council well to date and has produced in year savings during recent years. The Council is debt free and steps have been taken to build appropriate reserves to address identified risks to date, including those arising from Business Rate appeals. The Council is facing growing financial risks due to austerity and business rates changes and needs to maintain a strong focus on actions to mitigate these risks to ensure its longer-term financial sustainability.

The Council has developed a range of partnerships in instances where there is a direct benefit to Purbeck. The Council is well regarded by its district partners although the perception is not universal with all partners and some regard the Council as isolationist and inward looking.

There are currently widespread discussions regarding a possible reorganisation of local government in Dorset and various models have been suggested by a range of stakeholders. Although there is no certainty that such a reorganisation will occur, the Council should build on early thinking and determine and communicate its position on how best to preserve Purbeck's identity as part of any potential new local government structure.

2. Key recommendations

Recommendation 1: Review whether the Council is allocating sufficient of its capacity to its top priorities of housing and economic growth. The Council has a clear Corporate Strategy that has 'Meeting the housing needs of local people' and 'Improving the local economy and infrastructure' as two of its corporate priorities. These priorities are supported by an ambitious programme of work that will require adequate resourcing if it is to be completed successfully. It is recommended that the Council review whether it is allocating sufficient resources to these priorities and delivering at sufficient pace against these ambitions.

Recommendation 2: Determine and communicate your position as regards potential structural changes to local government. During the peer challenge reference was made by a large variety of people to potential local government re-organisation. Although there is no certainty that any re-organisation will take place, several stakeholders expressed their desire to have a clear understanding of the Council's attitude towards such potential re-organisation. A clear articulation of this would also help internal stakeholders.

Recommendation 3: Maintain focus on financial management to achieve required savings targets, mitigate risk (especially Business Rate risk) and secure financial sustainability in the longer term. The Council should identify specific sources for its as yet unallocated savings targets in its financial strategy as soon as is practical. It also needs to maintain its strong and informed focus on the financial management of its business rates (which are formally reviewed each year) to mitigate risk in order to secure its financial sustainability and to deliver its key corporate objectives.

Recommendation 4: Think through what can be put in place now to preserve the identity and distinctive character of Purbeck. The Council's area is distinctive and includes environmental features that rank as World Heritage Sites, villages with individual character, major tourist attractions etc. The Council wishes to preserve these features whilst facilitating growth and throughout any possible local government reorganisation. It is recommended that the Council devotes time to think through how to do this and the peer team recommend in particular that the involvement of parish and town councils may be useful in this respect.

Recommendation 5: Engage middle managers more actively as part of your leadership family. The Council's middle managers are a major asset and resource. Despite the open and inclusive management style prevalent in the Council they have expressed a desire for even greater and earlier involvement in strategy development and budget management. The Council should identify ways to harness this enthusiasm and resource particularly in view of the increasing financial pressures on its ambitious work programme and service standards.

Recommendation 6: Review and agree a response to the general survey results. The Council has recently introduced a general survey which is undertaken through rolling feedback from service users. Individual services also have various feedback methods. Although the number of respondents to the general survey is still small, some indicators of satisfaction appear low and it was not apparent how the analysis of the general survey will be systematically incorporated into performance management and service development. A systematic approach to the use of the survey would be useful.

3. Summary of the Peer Challenge approach

The peer team

Peer challenges are delivered by experienced elected member and officer peers. The make-up of the peer team reflected your requirements and the focus of the peer challenge. Peers were selected on the basis of their relevant experience and expertise and agreed with you. The peers who delivered the peer challenge at Purbeck District Council were:

- John Robinson, Chief Executive - Gedling Borough Council
- Councillor Nick Daubney, Leader of Council & Portfolio Holder for Performance and Resources - King's Lynn and West Norfolk Borough Council
- Claire Pearce, Group Manager, Strategy and Development - Sedgemoor District Council
- Phil Wilson, Chief Accountant and Deputy s151 Officer - Swale Borough Council
- Bob Ross, LGA Challenge Manager

Scope and focus

The peer team considered the following five questions which form the core components looked at by all Corporate Peer Challenges cover. These are the areas we believe are critical to councils' performance and improvement:

1. Understanding of the local place and priority setting: Does the council understand its local context and place and use that to inform a clear vision and set of priorities?
2. Leadership of Place: Does the council provide effective leadership of place through its elected members, officers and constructive relationships and partnerships with external stakeholders?
3. Organisational leadership and governance: Is there effective political and managerial leadership supported by good governance and decision-making arrangements that respond to key challenges and enable change and transformation to be implemented?
4. Financial planning and viability: Does the council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?

5. Capacity to deliver: Is organisational capacity aligned with priorities and does the council influence, enable and leverage external capacity to focus on agreed outcomes?

The peer challenge process

It is important to stress that this was not an inspection. Peer challenges are improvement-focussed and tailored to meet individual councils' needs. They are designed to complement and add value to a council's own performance and improvement focus. The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read.

The peer team prepared for the peer challenge by reviewing a range of documents and information in order to ensure they were familiar with the Council and the challenges it is facing. The team then spent 3 days onsite at Purbeck during which they:

- Spoke to more than 55 people including a range of council staff together with councillors and external partners and stakeholders.
- Gathered information and views from more than 23 meetings, visits to key sites in the area and additional research and reading.
- Collectively spent more than 150 hours to determine their findings – the equivalent of one person spending more than 4 working weeks in Purbeck.

This report provides a summary of the peer team's findings. It builds on the feedback presentation provided by the peer team at the end of their on-site visit (14th – 16th March 2016). In presenting feedback to you, they have done so as fellow local government officers and members, not professional consultants or inspectors. By its nature, the peer challenge is a snapshot in time. We appreciate that some of the feedback may be about things you are already addressing and progressing.

4. Feedback

4.1 Understanding of the local place and priority setting: Does the council understand its local context and place and use that to inform a clear vision and set of priorities?

Members and officers displayed a thorough understanding of the distinctive area and the community they serve. There was an obvious pride regarding Purbeck from all those spoken to and it is clear that they care deeply about Purbeck's natural environment and the needs of its residents. It was also noticeable that a very high proportion of members of the Council also serve on parish and town councils and this greatly helps their local knowledge and understanding of community wishes.

Through this understanding the Council has created a clear vision for Purbeck that matches local need. In particular the Council strives to achieve a balance between protecting the outstanding natural environment, creating housing and stimulating economic growth. The Council has been proactive in planning to achieve this balance and has a Local Plan, Economic Development Strategy and Enterprise Zone in place – with a partial review of the local plan underway. The housing and growth strategies examined by the peer team clearly illustrated a respect for and desire to preserve the high quality of the natural environment.

The vision of the Council is captured in a simple Corporate Strategy that lists five priorities. The peer team found that the Corporate Strategy is a very effective summary of the ambitions of the Council. Although each of the priorities contains a range of targets specified in the Corporate Strategy, it was observed that there was not a clear understanding of specific targets to take this vision forward. Allied to this it is recommended that the Council seeks to widen input to the development of the Corporate Strategy and its targets in order to enhance such understanding and ownership. This is especially important as the growing resource pressures mean that there is a need to increasingly manage public and partners expectations regarding performance and priorities.

The Council seeks feedback on its individual services through a variety of customer satisfaction methods. It has recently commenced a rolling general survey but this does not appear to be embedded and used by the Council. A Customer Excellence group does exist and has made various improvements (e.g. improved interview facilities) and there is an opportunity to use feedback from the general survey to monitor levels of satisfaction more systematically and help develop services.

The planning service underpins much of the Corporate Strategy of the Council and it is effective and efficient. Significant performance management measures have been put in place and the good performance is illustrated by the following statistics:

- Purbeck processed 92% of Major applications processed within 13 weeks in 2014/15 which is within the top quartile

- 89% of Minor applications processed within 8 weeks in 2014/15 which is within the top quartile
- 98% of other applications processed within 8 weeks in 2014/15 which is also within the top quartile.
- 95.5% of major applications processed within 13 weeks in the 24 months up to September 2015. This is within the top quartile and ranks 20th nationally
- 0.5% of decisions were overturned at appeal in the 24 months to the end of December 2014.

4.2 Leadership of place: Does the Council provide effective leadership of place through its elected members, officers and constructive relationships and partnerships with external stakeholders?

As stated in section 4.1 members have a thorough understanding of the community and the area they serve. They are able to articulate clearly the needs of their community and to act as ambassadors for the area when working with partners, neighbouring authorities etc. They are proactive in communicating with their individual communities and have identified the key priorities they wish to promote through the work of the Council. The vision of supporting thriving communities in balance with the natural environment and enhancing the special qualities of the District runs through the work of the Council.

Taking this vision forward is a difficult task in view of the wide range of factors the Council has to balance e.g. large areas of Purbeck are protected by a range of national and international designations including World Heritage Sites, 36% of the district is heathland and in order to meet European Habitats Regulations a 400 metre buffer is enforced around this where further residential development is no longer permitted, 60% of the population live in the largest settlements of Swanage, Wareham and Upton, second home ownership is high etc. Unemployment in Purbeck is comparatively low but earnings are also low on average and house prices are high. The combined effect of these factors is a lack of housing affordable to local people which the Council is trying to address.

Strong leadership is required to balance the protection of the natural environment with the need for housing and growth. This necessitates the ability to make difficult decisions that balance these priorities in a sensitive way. To help achieve this balance the Council ensures that it has an up to date Local Plan to make sure that it retains control over where development occurs and so help maintain the distinctive character of Purbeck. As so much of Purbeck is environmentally sensitive there is generally scope for local concern over any designation for housing and/ or growth and this requires firm, clear and open decision making to achieve the balance.

The Council is currently reviewing the Local Plan partly to deliver additional housing in response to an updated objectively assessed housing need. Although this review is sensitive in view of the factors outlined above it is essential that the Council is clear regarding its future ambitions for growth and it was evident that officers would welcome completion of the partial review of the plan as soon as possible to articulate this ambition.

Another example of the willingness to take difficult decisions is evidenced by the Council decision in 2014/15 to refuse to take the council tax freeze grant offered by the Government. Instead the Council took the difficult decision to increase the council tax in order to protect the value of its baseline funding in the medium term. For the same reason, the freeze grant offered for 2015/16 was also refused. As a result of the decisions taken by

the Council concerning its finances it has enabled itself to meet the austerity targets set by the Government.

The Council has a pragmatic approach to partnerships. It has a range of partnerships (e.g. Dorset Waste Partnership, Revenues and Benefits partnership with West Dorset and Weymouth and Portland Councils) but only enters into partnership when there is a clear benefit to Purbeck. It is active in identifying beneficial partnerships at a variety of levels e.g. L.E.P., parish councils etc. The peer team spoke to a wide variety of partners throughout the time on site and it was apparent that the Council is respected and valued by district partners. However, it was also noted that partners' perceptions are not universally positive. In particular, partners with responsibility for broader Dorset issues sometimes perceived the Council as isolationist and inward looking.

However, it is noticeable that the Council is active across a wide range of Dorset wide issues and has good examples of leading pan Dorset initiatives e.g. the Council Solicitor is leading on developing the governance arrangements of the combined authority and the Chief Executive is helping to guide the resolution of difficulties arising from the waste partnership's finances. It was also noticeable that the community and voluntary sector is keen to be an even more active partner. In particular parish/ town councils felt that they could explore how they could be more involved in the operation of services. In addition some of the environmental groups spoken to expressed a desire to explore closer working.

There are currently widespread discussions regarding a possible reorganisation of local government in Dorset and various models have been put forward. Although there is no certainty that there will be any reorganisation, a key challenge for the Council is to determine and communicate its position and how best to preserve Purbeck's identity as part of any potential new local government structure. Allied to this, it was noticeable that there are very varying levels of awareness as regards potential changes both within the Council and with external partners.

4.3 Organisational leadership and governance: Is there effective political and managerial leadership supported by good governance and decision-making arrangements that respond to key challenges and enable change and transformation to be implemented?

There is an open, inclusive and visible leadership style that was mentioned and observed throughout the peer challenge. Members and staff at all levels reported good member/ officer working relationships. This style stems from the very top of the Council and the Leader of the Council has taken steps to ensure an inclusive approach and style through various mechanisms e.g. ensuring many members of the Council have a position and/ or area of responsibility, encouraging members to attend and speak at meetings of the Policy Group. Similarly the Chief Executive has an open door policy and has a detailed knowledge of the operation of the Council and engagement with staff at all levels.

The peer team were requested by the Council to examine and comment on its governance arrangements. The Council has an unusual governance structure in that the full council is the Executive, there is no scrutiny function (although there is an Audit and

Governance Committee which is responsible for monitoring finance and performance) and there is a Policy Group with no decision-making powers but which considers all reports about policy before they go to full council. The Policy Group consists of the Leader of the Council, Deputy Leader and five other spokespersons appointed by the Leader but any member is welcome to attend and speak. The Policy Group meets before political group meetings and prior to full council. This means that in the case of some reports they may be prepared by officers, considered at Policy Group without dissent but face amendment when or before they are presented to full council. This can take up officer time but does allow for consideration and discussion of reports and the conclusion of the peer team was that although it is unusual the structure suits the Council's leadership style, size and approach to inclusion.

An area that could be enhanced is the use of Policy Development Panels. The Policy Group can commission these but in practice they are not commonly used. However, these panels, if used more extensively, could allow for detailed examination by members and create some of the member policy development function which is part of effective scrutiny arrangements used by many other authorities.

At the last election there was a very significant influx of new members. A comprehensive training programme was designed and implemented. This has been well received by new members and has equipped them with the basic knowledge they need to fulfil their role. New members were also placed in significant positions e.g. vice chair of the Council, chair and vice chair of the Audit and Governance Committee. In addition to member training the officer leadership style and good working relationships mean that support is always available if required.

During the induction period training quite correctly concentrated upon instilling knowledge of council functions, legislation etc. rather than skills development. The Council should consider whether there is now scope for further development. In particular the peer team noted that there are different levels of awareness regarding the performance of the Council and limited evidence of members input to and influence over performance management (although bulletins are sent to all members and debated at the Audit and Governance Committee). This is an area that the Council should consider and identify mechanisms for enhancing member involvement in performance management.

The inclusive approach of the Council and its leaders has already been mentioned. As part of this approach positive steps have been made to encourage public participation in meetings. This includes a 15 minute allocation at the start of each full council meeting for members of the public to raise and speak to issues of their own choosing. This facility is used regularly.

Another area which the Council should explore is how to maximise the involvement and skills of its middle managers. Despite the open and inclusive management style prevalent in the Council they have expressed a desire for even greater and earlier involvement in strategy development and resource allocation/ financial management. The Council should identify ways to harness this enthusiasm and resource particularly in view of the increasing financial pressures and its ambitious work programme.

4.4 Financial planning and viability: Does the council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?

There is proactive and effective management of the Council's finances with political and managerial leaders displaying real 'ownership' and understanding of the current and future financial position. The Council has been judged by its external auditors to have effective measures in place for its financial management. Their report on the 2014/15 accounts stated: "These include, in the context of Purbeck, arrangements for ensuring liquidity, management of staff, performance against budget and the level of reserves. Our review of performance management reports, budget outturn reports, treasury management arrangements and balances in the annual accounts has provided sufficient assurance the Council's arrangements are satisfactory". Furthermore out of all the Internal Audit reports for the past two years, only one received a "limited" assurance with all the others judged to be "adequate" or above.

Quarterly monitoring on revenue and capital is provided to the Audit and Governance Committee and this provides explanations for budget variances. This approach aids the Council in ensuring that its medium term financial plan is being implemented successfully. There is also good provision of financial information to service managers ensuring that they have timely information and up to date understanding of the financial position. There is some inconsistency in reporting formats used when reporting in year monitoring, outturn or the medium term plan. A consistent format showing budget variances affecting the General Fund balance may provide members and officers with a clearer picture of the Council's financial position and how and why this has changed.

Through this management approach the Council has been successful in tackling its financial challenges to date, and has planned and managed to contribute to its balances in the last few years through in-year under spending. The Council has approved a £5 increase for Purbeck District Council's "Band D" 2016/17 council tax and has been successful in attracting a moderate amount of New Homes Bonus (NHB), which it has built into its baseline income. The Council has used various strategies for balancing its budget including increasing and introducing charges for services, restructuring of senior management team and staff savings including through flexible working.

The Council still faces significant financial challenges. The latest medium term financial plan (MTFS) agreed in February 2016 shows the Council will need to save a further £0.48m to balance the budget in 2017/18 to compensate for the forecast reduction in Revenue Support Grant, the proposed changes to NHB and being on the safety net for business rates due to the cost of appeals. The full details of the required savings over the next few years have yet to be allocated and the Council should undertake this as soon as practical.

The Council believes the further savings required will be difficult to achieve following so closely on the savings achieved in the 2016/17 budget. As the Council has reserves that are £0.5m more than the minimum it deems necessary it will be able to use this as a contingency if necessary to phase the next reductions. Although, obviously, these reserves are 'one off monies' and, if used, will increase the financial risk to the Council in the medium term.

The Council is in the unusual position of having 35% of the total business rates it collects due from two business ratepayers. One of these is the Ministry of Defence (MoD) which pays 10% of the total business rates and which appealed last year resulting in a 20% reduction in their business rates against the 2005 and 2010 lists. This settlement resulted in a repayment of over £2m. The other business ratepayer is an oilfield operator that pays 25% of the total business rates. This operator has also appealed, against the 2010 list and, if successful, may result in a very substantial repayment although the exact amount is hard to judge. The localisation of business rates has resulted in a combination of a technically complex scheme, significant sums of money and difficult timetabling for allocating these sums. The Council must maintain its strong and informed focus on the financial management of its business rates to mitigate risk (these rates are reviewed each year and its technical team has projected likely appeal outcomes). The Council could consider further co-operative working with the major preceptors to determine if they could provide support to improve collection rates for council tax as well as business rates to the mutual benefit of all preceptors.

Although significant risks are outlined above the Council is debt free and intends to remain so despite its various budgetary pressures. The Council has conducted a risk assessment of the budget and has set aside balances to deal with any unforeseen financial difficulties. The minimum balance is £0.5m higher than the risk assessment contained in the Financial Strategy and stands at £0.94m.

The Council has a capital programme focused on economic development. A significant capital project is Dorset Green - a business development site that has enterprise zone status. Its purpose is to provide economic development which will also create future revenue streams for the Council that will offset the initial set up costs. Originally, it was assumed that a partner organisation would part fund phase one of this project. However, when this arrangement was in doubt the Council put in place a contingency arrangement whereby it would internally borrow for what would have been the partner's share. This avoids external borrowing and ensures that the Council does not incur interest charges; however, there will be a loss of interest from not having those funds available for investment. The borrowing will result in an annual cost to the revenue budget called a "minimum revenue provision" in order to repay the borrowing over the estimated useful life of the asset. The effect upon the revenue budget needs to be reported on as part of monitoring and any updating of the MTFS.

4.5 Capacity to deliver: Is organisational capacity aligned with priorities and does the council influence, enable and leverage external capacity to focus on agreed outcomes?

The Council has a clear corporate strategy that has 'Meeting the housing needs of local people' and 'Improving the local economy and infrastructure' as two of its corporate priorities. This is matched by an ambitious programme of work that will require appropriate resourcing if it is to be successfully completed. The Council has redeployed a member of staff to economic development and taken on a senior professional on a two year fixed term contract and the LEP has agreed to put staffing into the Enterprise Zone. However, the Council should keep the required staffing required by its ambitious programme under review and ensure it is allocating sufficient of its capacity to its top priorities of housing and economic growth.

There is no current Workforce Development Plan or up to date staff survey results. However, the staff at the Council were found consistently to have professional expertise backed by a 'can do' culture and a pride in Purbeck. The size of the Council's staff allows people to be aware of what is happening within the Council and form close working relationships. The Council has an Appraisal and Development Review scheme which is well embedded and valued by staff. Many of the staff spoken to were able to give examples of specific training that had been made available as a result of such reviews.

Despite the potential for strain due to the financial position there was still found a wealth of goodwill, high motivation and pride that is mitigating the effects of decreasing capacity. However, staff will face further challenges due to the worsening financial situation and possible local government reorganisation. Already some staff reported that they are feeling the strain of trying to maintain existing standards (or improve them) with reduced resources. In many areas there is also a danger of considerably reduced resilience with the Council reliant on the expertise of small teams or even a single individual. The Council should examine the resources it now has and decide whether it is possible to maintain service levels and review its ambitious service standards accordingly.

The Council should also examine whether it is possible to provide some further support in two particular areas:

- a) Development of programme of support to enable managers to become more commercially focused: Many of the managers spoken to accepted the need for an increasingly commercially minded approach and were willing to adopt this. However, many also stated that they would welcome training and support to develop such an approach
- b) The peer team welcomed the creation of a Staff Wellbeing Group: As stated above staff are likely to be subject to increased stress in coming years and the Council should consider developing a package of support to staff during such upheaval (e.g. personal resilience training etc.) in addition to its existing support mechanisms such as the availability of counsellors.

The Council has been successful in leveraging additional resources through the use of partnerships for day to day service delivery in some areas e.g. an example given by the Council was its use of partnership with Urban Vision (a public private partnership between Capita and Salford Council) to ensure delivery of a robust building control service during a period of long term illness. In addition specific projects have been undertaken using partner resources to supplement the Council's own input e.g. Dorset Green.

The Council is increasingly adopting a commercial approach and has some encouraging examples of success. One of these is the Council's Building Control section where changes to building control in recent years means that local authority services now have to compete for business with the private sector. The Building Control Section has a very professional and commercially minded approach to marketing itself and its services. This is seen as an example that all services could learn from.

During the time on site it was not possible due to time constraints to undertake a thorough examination of the Council's IT and approach to channel migration. Although the Council adopted an Access to Service Strategy in July 2013 there was no evidence that this is widely 'owned' or embedded within the Council. Staff were spoken to regarding their own IT facilities and it was reported that there were difficulties in accessing some software through 'thin client' machines. Some staff that undertake a significant amount of site visits and other external work also stated that greater access to systems through mobile devices would aid their efficiency. It is understood that the Council has a programme for supplying improved mobile equipment and implementation of this as soon as is possible will be welcomed by staff.

5. Next steps

Immediate next steps

We appreciate you will want to reflect on these findings and suggestions with your senior managerial and political leadership in order to determine how the Council wishes to take things forward.

As part of the peer challenge process, there is an offer of further activity to support this. The LGA is well placed to provide additional support, advice and guidance on a number of the areas for development and improvement and we would be happy to discuss this. Andy Bates, Principal Adviser is the main contact between your authority and the Local Government Association (LGA). His/her contact details are: Tel: 07919 562849
Email: andy.bates@local.gov.uk

In the meantime we are keen to continue the relationship we have formed with you and colleagues through the peer challenge. We will endeavour to provide additional information and signposting about the issues we have raised in this report to help inform your on-going consideration.

Follow up visit

The LGA peer challenge process includes a follow up visit. The purpose of the visit is to help the Council assess the impact of the peer challenge and the progress it has made against the areas of improvement and development identified by the peer team. It is a lighter-touch version of the original visit and does not necessarily involve all members of the original peer team. The timing of the visit is determined by the Council. Our expectation is that it will occur within the next 12-24 months.