

Audit, Risk and Assurance Committee

Date	11 March 2024
Report title	Health and Safety Annual Update
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Accountable Chief Executive	Laura Shoaf Chief Executive Email: Laura.Shoaf@wmca.org.uk
Accountable Employee	Pete Bond Director of Integrated Transport Services Email: Pete.Bond@tfwm.org.uk
Report has been considered by	Not Applicable

Recommendation(s) for action or decision:

ARAC is recommended to:

Note the annual update on Health and Safety contained within this report.

1. Purpose

1.1. The purpose of this report is to provide a summary of principal activities relating to the promotion and management of health and safety and outcomes during the past year and outline the strategic direction for occupational health and safety within the wide-ranging remit of the West Midlands Combined Authority (WMCA).

2. Background

2.1. The financial year 2023-24 represents the first year of the current *Health and Safety Strategy 2023-26*.

2.2. As we have entered a new strategy period, an important focus of activity remains to build upon existing progress and further embed proactive systems designed to raise awareness, ensure safety, and so far as is reasonably practicable, prevent or reduce the risk of harm occurring to our staff, public, contractors, visitors and partner organisations.

2.3. The health and safety landscape has altered significantly in recent years, and it will inevitably continue to evolve as working practices and technologies change.

2.4. As we have adapted our ways of working, it has been recognised that the way we manage health and safety must also continue to evolve. With a shift from fixed workplaces and our previous operational norms, there has needed to be a renewed focus on health and wellbeing support, whilst also ensuring that high standards of occupational safety continue to be maintained.

3. Health and Safety – Key Achievements

3.1. The Health and Safety Team have continued to utilise every opportunity to implement enhancements to health and safety arrangements and management systems, ensuring standards of safety and compliance are being maintained consistently across the organisation.

3.2. The below table provides an overview of the key achievements and activities:

Key Achievements and Activities 2023-24	
✓	Review and update of Health and Safety Policy Policy statement of intent, organisation & responsibilities, and arrangements for implementation have been reviewed and updated to ensure they reflect the updated arrangements for the management, governance and reporting of Health and Safety within the organisation. Strategic Priorities set out in the policy statement of intent have been updated to ensure these align with those articulated in the <i>WMCA Health and Safety Strategy 2023-2026</i> . Sign-off by Laura Shoaf, Chief Executive in November 2023.
✓	Health and Safety Strategy 2023-2026 <i>WMCA Health and Safety Strategy 2023-2026</i> presented to Executive Board for final review and endorsement in May 2023, prior to formal launch in July 2023 (to follow the launch of the <i>WMCA People and Culture Strategy</i>). An Annual Delivery Plan is produced and communicated for each financial year the strategy covers. Progress against this plan is reported periodically to relevant Boards and Committees.
✓	Safety Management System (SMS) Review and Update The Safety Management System (SMS 01.1) has been reviewed and updated to ensure it remains aligned to the clauses of the ISO 45001:2018 standard, as well as reflecting the updated arrangements for the management, governance and reporting of health and safety within the organisation. This includes changes required to support hybrid working and programme delivery. The SMS also documents all safety provisions as required by pertinent health and safety legislation as it applies to WMCA. The suite of general arrangements and guidance documents that support the SMS are updated against a rolling schedule, with any significant changes communicated, and made available to all staff via the Health and Safety intranet.

✓	<p>Understanding the Context of the Organisation</p> <p>Context of the Organisation (SMS 01.3) has been updated to ensure a detailed understanding of the organisation and its context in the wider world, including internal and external issues relevant to the SMS. This also includes the needs and expectations of interested parties, including both internal and external stakeholders. This is an essential tool to identify the full scope of our organisational SMS and ensure it remains fit for purpose.</p>
✓	<p>Internal Review of WMCA Health and Safety Governance Arrangements</p> <p>Review of the Health and Safety governance arrangements in place for WMCA in order to assess the overall effectiveness and suitability of these, given the complexity and nature of the activities and undertakings of the organisation. Ensuring arrangements continue to provide a robust platform and effective management structure, where no ambiguity exists relevant to accountability, responsibility, assurance and delivery of Health and Safety.</p>
✓	<p>ISO 45001:2018 Occupational Health and Safety Management Systems Standard</p> <p>Successful recertification and retention of ISO 45001:2018 confirming compliance with the requirements of the standard. An internationally accepted method of assessing and auditing occupational Health and Safety management systems. Certification is valid until January 2026, based on successful demonstration that the requirements of the standard continue to be met via completion of annual surveillance audits.</p>
✓	<p>Ongoing Health and Safety Committee Structure</p> <p>The <i>Strategic Health and Safety Committee</i> and <i>Safety, Health and Environment Committee</i> have continued to provide forums to facilitate the appropriate level of challenge, allow effective escalation of issues where required, provide a further means for consultation and communication, and support delivery of strategic direction on any proposed or implemented changes.</p>
✓	<p>Programme Delivery – Health and Safety Resource and Assurance</p> <p>Continued monitoring and oversight of Health and Safety performance on Programme Delivery project activity. Work continues to seek enhancements with the respective Project Sponsors, Project Managers, and project Health and Safety contacts to ensure suitable oversight and resources are available from a ‘Client’ perspective, as defined by the <i>Construction (Design and Management) Regulations 2015</i>.</p>
✓	<p>Delivery Directorate (TfWM) – Health and Safety</p> <p>Ensuring a smooth integration into the wider WMCA Health and Safety framework for the new Delivery Directorate (TfWM), working closely with the Delivery Directorate Technical Services Unit Health and Safety function.</p>
✓	<p>Compliance Assurance of SMS for Metro Operator and Bromsgrove Rail Station</p> <p>Compliance assurance of Midland Metro Limited’s SMS with the <i>Railway and Other Guided Transport (Safety) Regulations 2006</i> in addition to all other relevant Health and Safety Legislation. This incorporated the annual audit conducted in September 2023. Similar arrangements exist for Bromsgrove Rail Station to verify compliance of the SMS against legislative requirements via an agreed operational model that identifies the specific Duty Holders and their respective responsibilities under the model for the safe operation and maintenance of the station and its infrastructure.</p>
✓	<p>Micromobility – E-Scooters / WM Cycle Hire</p> <p>Provision of Health and Safety oversight and guidance in relation to E-Scooter and WM Cycle Hire schemes. Including supporting WMCA’s formal response to the Coroner’s Regulation 28 Report to Prevent Future Deaths in relation to the fatality in December 2022 and in preparation for and following relaunch of the E-Scooter scheme in August 2023.</p>

✓	<p>Accident, Incident and Near Miss Reporting and Incident Investigation Tool</p> <p>Accident, Incident and Near Miss Reporting and Incident Investigation Tool enhancements . Since launch in February 2022, a notable improvement has been seen in the quality of the data submitted, which has facilitated improved trend analysis and the ability to share pertinent data internally with the Bus Station Management Team, Corporate Insurance and Policing and Security, etc. The importance of near miss reporting continues to be promoted, providing early warning that intervention may be required and assist in preventing future adverse events.</p>
✓	<p>Display Screen Equipment and Hybrid Working Arrangements</p> <p><i>SMS 6.0 Display Screen Equipment</i> and <i>SMS 14.0 Hybrid & Remote Working</i> updated to reflect the updated <i>Hybrid Working Policy</i> and Guidance issued by HR in October 2023. Online DSE self-assessment form also subject to review to ensure this remains suitable and sufficient and in line with the Hybrid Working Policy.</p>
✓	<p>Permit to Work Enhancements / Contractor On-Site Form</p> <p>Development of a new Permit to Work System and Contractor On-Site Form to strengthen the management of contractors working on our premises. The new system moves the existing arrangements online and includes provision for general, hot work, carriageway, confined space, and working at height (including roof access) permits. This has been supported by a written SMS procedure and appropriate training.</p>
✓	<p>Health and Safety E-Learning</p> <p>Two new courses have been launched via Learning Pool, a general health and safety training and fire safety awareness training which are available to all office-based colleagues. These courses are mandatory and sit alongside the Display Screen Equipment, Personal Safety, and Manual Handling courses which are already available. Note: Out based / frontline staff are provided with health and safety training and fire safety training applicable to their roles.</p>
✓	<p>Health and Safety Training Programme</p> <p>A wide range of training has been provided to colleagues commensurate to their roles and responsibilities including but not limited to: IOSH Leading Safely (for Executive Directors and Directors); IOSH Managing Safely; IOSH Working Safely; NEBOSH General Certificate; Asbestos Awareness; Conflict Management Training; Construction (Design and Management) 2015; First Aid; Fire Warden; Incident Investigation; Legionella Awareness; Manual Handling.</p>
✓	<p>Audit and Inspection Schedule</p> <p>Maintained high levels of safety compliance of organisational assets via undertaking proactive scheduled health and safety audits and inspections, ensuring the ongoing safety of staff, customers, and stakeholders. This has included update to the audit criteria utilised by the Health and Safety Team to ensure ongoing statutory and procedural compliance, as well as drive continual improvement.</p>
✓	<p>Internal Audit of Health and Safety</p> <p>WMCA's Health and Safety Management System was included as part of the approved Internal Audit Plan for 2023-2024. The purpose of the review was to seek assurance that a health and safety management system is in place that aligns to ISO 45001. The audit identified several examples of good practice within the system and in the management of risk and concluding that the framework is strong, and compliance is good, with the overall conclusion based on the Internal Audit Standard Assurance Matrix, is that the system is "Effective" and an overall conclusion of "Satisfactory" assurance.</p>
✓	<p>Benchmarking – Safety Targets and Reporting Mechanisms</p> <p>Collaborated on a benchmarking exercise commissioned by Transport for London (TfL). The focus of the safety benchmarking was in relation to recording and monitoring of safety incidents; safety target setting; and forecasting and was supported by a workshop allowing two-way discussion with representatives from TfL. Anonymised findings of the wider benchmarking exercise shared with all participants.</p>

4. Health and Safety Strategy 2023-2026

4.1. The purpose of the *Health and Safety Strategy 2023-2026* is to provide a summary of principal activities relating to the promotion and management of health and safety, setting out the strategic direction for the period it covers.

4.2. The strategy has the support of the Chief Executive of the WMCA and the Executive Directors of the WMCA Executive Board who have provided formal endorsement. It has been developed by the WMCA Health and Safety Team in collaboration with key stakeholders across the organisation and has been considered and approved by various Boards and Committees across the organisation.

4.3. In developing the strategy, cognisance has been given to the importance of continuing to build in a planned, systematic way to allow for health and safety to be further integrated into all WMCA operational activities, ensuring proportionality in health and safety management, and enabling improvement through efficient and effective delivery.

4.4. In order to achieve the organisation's vision for occupational health and safety, the strategy contains our guiding principles, which underpin the delivery and approach to Health and Safety – i) Manage, ii) Influence, iii) Collaborate, iv) Innovate, v) Empower.



Manage

Policy, strategy, safety management system

Providing an effective framework to allow all directorates to fully integrate health and safety into their operational norms and practices, ensuring the organisation becomes an increasingly safer and healthier place to work.



Influence

Culture, leadership, safety perception

Engendering an effective health and safety culture through the continuous improvement of attitudes, perceptions, competences and patterns of behaviour. Ensuring health and safety is valued and visible at all levels of the organisation.



Collaborate

Knowledge sharing, consultation, stakeholder & partners

Committed to working proactively to engage with key stakeholders, partners, contractors, and suppliers to ensure co-operation and alignment of health and safety management systems where necessary.



Innovate

Enhanced processes, promotion methods and supporting systems

Ensuring an ambitious approach towards continual improvement be pursued, utilising innovative, efficient and effective delivery of health and safety management, maximising our potential to affect positive change.



Empower

Ownership, competence, confidence

Encouraging ownership of health and safety at every level of the organisation, ensuring staff are provided with the relevant competencies and have the confidence to use this knowledge effectively.

4.5. These principles support six distinct strategic priorities, taking into consideration our wider organisational values: *Collaborative, Driven, Inclusive, Innovative*.



Ownership & Community

Aim: We will create and support a diverse, knowledgeable and empowered organisation where health and safety is visible and valued, where we work in collaboration to deliver our shared aims and objectives.



Holistic Management

Aim: We will ensure effective and proportional systems for the management of health and safety are incorporated throughout all operations of the WMCA. We will provide management systems that are accessible, innovative, and holistic.



Specialisms

Aim: We will embed pragmatic health and safety solutions that empower those delivering the wide-ranging remit of the WMCA, while ensuring a safe and healthy environment for all, cognisant of the specific risk factors for each directorate / business area.



Communication

Aim: We will communicate appropriately with the staff and stakeholders, ensuring we are accessible, fair and impartial. We will understand the importance of having clear, simple and transparent communication.



Knowledge

Aim: We will ensure we have a trained and knowledgeable staff. Valuing knowledge and seeking to engage with others to enhance our methods, we will seek out and celebrate the presence of positive practices and behaviours.



Assurance

Aim: We will monitor and learn from our performance, always seeking to improve practices to ensure the safety and health of our activities and undertakings. We will review and continually evolve our systems and practices.

4.6. The strategy is supported for each of the three years that it covers, by an Annual Delivery Plan which provides further detail on how we will deliver against our strategic priorities, goals and objectives.

4.7. Progress against the delivery plan is reported quarterly to the *Strategic Health and Safety Committee* and the *Safety, Health and Environment Committee*. Updates in relation to specific deliverables are also included as part of monthly Health and Safety reporting, which is presented to several Boards.

4.8. Should any significant new or emerging risks be identified, there is scope for these to be added to the delivery plan as necessary, and which will then be subject to the appropriate mitigation measures to eliminate or reduce the risk, so far as is reasonably practicable.

5. Summary of Current Position and Future Areas of Focus

5.1. There are not currently any specific areas of concern or particular items for urgent improvement, however it will be critical that all departments fully integrate health and safety into their operational norms and practices, ensuring the organisation becomes an increasingly safer and healthier place to work.

5.2. The effective implementation of the strategy and associated delivery plan objectives will be essential to ensure the continued integration of positive occupational health and safety management practices into all aspects of the organisation's activities and undertakings.

5.3. The Health and Safety Team has a pivotal role to play in the monitoring and assurance of the strategy and associated annual delivery plan(s) and will work closely with all areas of the organisation, trade unions, partners and stakeholders to promote ownership of health and safety and empower managers and others to actively manage health and safety with the same degree of expertise to the standards of other core business activities.

5.4. The following tables set out the Areas of Focus and Success Measures which have been identified for each of the Strategic Priorities described in section 4 of this report:

i. Ownership and Community 	
Areas of focus	
<ul style="list-style-type: none"> ▪ Leadership - empower and support our leaders and managers at all levels, ensuring their health and safety responsibilities are understood. ▪ Community - build and support an engaged workforce, harnessing their knowledge and experience to deliver improved health and safety outcomes. ▪ Culture - build a positive health and safety culture through the delivery of an ongoing campaign aligned to the principles of 'Safety Differently'. ▪ Stakeholders - ensure stakeholders, partners, suppliers and contractors are aware of our health and safety principles and priorities and share in our commitment. 	
Success Criteria	
<ul style="list-style-type: none"> ▪ Leadership are able to discharge their legal duties and demonstrate a sufficient level of competence to plan, manage, monitor and continuously improve health and safety performance within their respective areas of responsibility. ▪ All parties play their part to support a proactive, robust health and safety management system which meets legal obligations and reduces risk to those affected by our activities. ▪ Staff at all levels of the organisation clearly understand their roles and responsibilities and accept ownership and accountability for health and safety matters. ▪ Leaders and Managers proactively engage in Visible Felt Leadership (VFL) activities. ▪ Evidence of a good culture and engaged community, where health and safety is visible and valued. ▪ Stakeholders, partners, suppliers and contractors are aware of and adhere to WMCA health and safety policies. 	

ii. Holistic Management



Areas of focus

- **Policy** - ensure policy is accessible and up to date, reflecting the organisational structure to enable good health and safety practice.
- **Safety Management System** - seamless and consistent integration of the safety management system throughout the organisation.
- **Risk Management** - ensure risk profiling, risk assessment and holistic risk management.
- **Wellbeing** - maximise the benefit to both colleagues and the organisation through greater alignment of the 'Health and Safety' and 'Wellbeing' strategies.
- **Supporting Systems** - ensure appropriate supporting systems which provide, management, oversight and assurance are available.

Success Criteria

- Policy is appropriately communicated and clearly articulates the statement of intent, roles and responsibilities, and arrangements for implementation.
- Consistent standard of health and safety management thoroughly embedded, applied and evident throughout all areas of the organisation.
- Appropriate resources are provided to allow for the effective management of health and safety.
- Effective and integrated risk management processes are evident.
- Links between Health and Safety *and* Wellbeing established and utilised effectively.
- Suitable supporting systems in place for incident reporting, investigation, audit and inspection, and the management of specific risks.

iii. Specialisms



Areas of focus

- **Specialist Support** - provision of specialist health and safety advice and support, with appropriate and proportional controls and risk management.
- **Programme Delivery** - ensure suitable health and safety arrangements exist for the management of programme delivery activity across the organisation.
- **Metro & Bromsgrove Rail Station** - ensure compliance with the requirements of the *Railways and Other Guided Transport Systems (Safety) Regulations 2006*, working in collaboration with the Owner's Representative / Operator (Metro) and Station Operator (Bromsgrove Rail Station).
- **Fire & Emergency** - ensure suitable and sufficient fire and emergency arrangements are in place across all premises.
- **Health Risks** - recognise and reduce health risks, with the aim of limiting ill-health in the workplace. Ensure positive and constructive links with EDI & Wellbeing Team and Occupational Health provider.

Success Criteria

- Competent advice is provided by the Health and Safety Team and/or specialist Health and Safety resource (as appropriate).
- Safety management system appropriately documents and provides guidance for specialist health and safety hazards.
- Risk registers are in place and recognise specialist health and safety hazards.
- Proportional controls are implemented and monitored ensuring appropriate management of high-risk activities.
- Robust arrangements for fire and emergency in place, communicated and tested at appropriate frequencies to verify their continued effectiveness.
- Health, both physical and mental, is considered when assessing risk and appropriate mitigation measures are in implemented.

iv. Communication and Transparency



Areas of focus

- **Communication Plan** - ensure a suitable Communication Plan is produced to support the delivery of the Health and Safety Strategy.
- **Committees** - ensure effective and transparent committees that are representative of our entire organisation.
- **Resources** - ensure an accessible and simple repository for health and safety information.
- **Promotion** - support a positive culture through the promotion of health and safety via existing communication methods and new innovative methods.
- **Branding** - develop and introduce a suitable 'brand' for health and safety within the WMCA.

Success Criteria

- Communication Plan introduced, with all communication activity achieving at least one of the key elements that will support the maintenance of a positive culture - *Educate, Embed, Engage*.
- Staff feel engaged on health and safety matters and have access to the information they require to promote and practice good health and safety practices.
- Committees operate effectively as per agreed Terms of Reference, providing suitable forums for the development of strategic direction and communication & consultation.
- Health and Safety intranet site is easy to use and navigate, providing staff with the information they require in accessible language.
- Improved methods for health and safety promotion and awareness, utilising existing methods as well as new platforms to ensure effective communication.
- Suitable 'brand' which is aligned to '*Safety Differently*' developed and implemented which is promoted and recognised across the organisation.

v. Knowledge



Areas of focus

- **Training** - training for both general and specific topics is provided to those who need it, ensure that people have the right knowledge and skills to do their job safely.
- **Responsibilities** - health and safety responsibilities are clearly defined and understood by all.
- **Competence** - competence is ensured and checked in a proportional manner.
- **Behaviours** - ensure the organisation supports and embeds good practices and behaviours.
- **Induction** - induction training is provided to staff, contractors and visitors (as appropriate).
- **Networking** - strengthen relationships with stakeholders and partners to facilitate sharing of best practice, knowledge and learning.

Success Criteria

- Health and Safety training opportunities which are accessible to all staff and ensure appropriate levels of competency.
- Staff at all levels of the organisation have been provided training that gives them the knowledge and skills needed, ensuring they are aware of and understand their responsibilities.
- The organisation continually evaluates and refreshes the knowledge of staff, ensuring ongoing competence.
- Positive practices and behaviours are celebrated, further enhancing a good culture.
- Staff, contractors and visitors (as appropriate) are provided with a suitable level of information as part of induction process.
- Strong links and effective network developed with other health and safety professionals to allow for active engagement, sharing of best practice, and benchmarking with other organisations.



Areas of focus

- **Governance** - ensure governance and reporting arrangements remain appropriate to the organisation's undertakings.
- **Reporting** - ensure comprehensive periodic reporting of health and safety performance, including provision of suitable dashboards. Ensure appropriate measures for exception reporting.
- **Audit and Inspection** - ensure a routine audit and inspection programme is implemented and completed against set schedule.
- **Action Tracking** - ensure suitable action tracking and timely completion, ensuring responsible managers are held to account.
- **Benchmarking** - identify and develop suitable mechanisms for benchmarking and performance review.
- **External Certification** - ensure continued accreditation to ISO 45001:2018 standard for occupational health and safety management systems. Undertake preparatory work for accreditation to ISO 45003:2021 standard.

Success Measures

- Health and Safety governance and reporting arrangements reviewed and updated to ensure they remain appropriate to the organisation's undertakings.
- Health and Safety reports and dashboards reviewed and updated to ensure they provide optimal information to recipients in a clear and concise format
- Audits and Inspection Programme of organisational premises, assets and undertakings completed against set schedule.
- Actions identified recorded on action tracker and actioned by responsible person within target completion date. Performance monitored and reported on.
- Suitable mechanisms for performance review and benchmarking in place, which seek to bring out key learning and opportunities for improvement.
- External assessment of organisation by awarding body with continued certification to the ISO 45001:2018 standard.

5.5. Introduction of an ongoing programme of *SMS Compliance Reviews* is to commence in April 2024 and will assist in ensuring that the safety management system is effectively embedded and consistently applied across the organisation, as well as identify areas for improvement and provide a benchmark for year-on-year comparison or comparison between directorates.

5.6. As part of the wider *WMCA People and Culture Strategy*, we must engender a sustainable organisational culture where all employees actively participate in, and support the advancement of, our shared aims and objectives in relation to health and safety.

5.7. Following the decision by Executive Board in October 2023 that the launch of the *Visible Felt Leadership (VFL) Programme* should be delayed, to allow for it to be introduced at a more appropriate time within the wider organisational leadership, people and culture activity, a suitable launch date will now be identified. This programme will be essential for engaging and motivating employees, whilst demonstrating commitment and support to overall health, safety and wellbeing management.

5.8 The Health and Safety Team will continue to work closely with the Equalities, Diversity and Wellbeing Team, with a key objective to undertake an initial assessment and complete the necessary preparatory work prior to attaining ISO 45003:2021 accreditation during 2023. This standard covers psychological health and safety at work and the management of psychosocial risks.

5.9. Robust arrangements will continue to be maintained in relation to management of contractors, ensuring the organisation discharges its 'Client' duties as defined by the *Construction (Design and Management) Regulations 2015*, and that projects are set up so that they are carried out from start to finish in a way that adequately controls the risks to the health and safety of those who may be affected. This includes but is not limited to selection of competent duty holders; ensuring appropriate management arrangements – planning, managing, monitoring; and completion of suitable handover arrangements.

5.10. Recertification to the ISO 45001:2018 standard was confirmed in November 2022 and has been maintained through the successful completion of annual surveillance visits. This certification is essential to externally verify our continued high levels of performance in relation to the management of occupational health and safety. It is intended that this will be complemented by attaining ISO 45003:2021 accreditation, bringing a greater focus on psychological health and safety at work.

5.11. It will be vital that suitable internal and external methods for lessons learnt and benchmarking are in place, which seek to bring out the key learning, opportunities, and next steps in relation to our Health and Safety performance. This follows the successful benchmarking exercise undertaken with transport partners in relation to safety targets and reporting mechanisms.

5.12. The Health and Safety Team has continued to support the wide-range of activities for which the organisation has a remit and promote the benefits of proportionate health and safety management as a positive instrument to ensure statutory compliance and organisational success rather than a burden to progress.

6. Financial Implications

6.1. There are no specific financial implications arising from this report, however as the remit and responsibilities of the WMCA evolve additional resources and budgetary allocation may be required to ensure effective delivery of the aims and objective set out within the Health and Safety Policy and associated Strategy.

7. Legal Implications

7.1. Although there are no current legal implications, cognisance should be given to all applicable Health and Safety legislation that places duties upon the organisation.

8. Single Assurance Framework (SAF) Implications

8.1 There are no specific SAF implications arising from this report

9. Equalities Implications

9.1. There are no specific equalities implications arising from this report. However, it can be confirmed that any changes implemented have been or will be subject to *Health and Equalities Impact Assessment*.

11. Inclusive Growth Implications

11.1. There are no inclusive growth implications arising from this report.

12. Geographical Area of Report's Implications

12.1. There are no geographical area implications arising from this report.

13. Other Implications

13.1. There are no other implications arising from this report.

14. Schedule of Background Papers

14.1. Not applicable