



**CROFTING COMMISSION
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COMMISSION MEETING

7 MAY 2025

**CROFTING COMMISSION MEETING
VIA TEAMS ON
7 MAY 2025 AT 0900 hrs**

AGENDA

1 APOLOGIES	<i>Oral</i>	<i>Standing Item</i>
2 DECLARATIONS OF INTEREST	<i>Oral</i>	<i>Standing Item</i>
3 DRAFT MINUTES FROM 26 FEBRUARY 2025*	<i>Minutes</i>	<i>For approval</i>
4 REVIEW OF ACTION POINTS FROM PREVIOUS MEETING (of 26 February 2025)	<i>Paper</i>	<i>For info</i>
5 MATTERS ARISING FROM PREVIOUS MINUTES	<i>Oral</i>	<i>Standing Item</i>
6 AUDIT & FINANCE COMMITTEE REPORT		
(a) <i>Update from Chair of Committee</i>	<i>Paper</i>	<i>Standing Item</i>
(b) <i>Draft Minutes from 23 April 2025*</i>	<i>Minutes</i>	<i>For info</i>
(c) <i>Annual Best Value Review Self-Assessment</i>	<i>Paper</i>	<i>For info</i>
7 REVIEW OF PERFORMANCE REPORT – Q4 – JANUARY-MARCH	<i>Paper</i>	<i>For info</i>
8 REVIEW OF STRATEGIC RISK REGISTER – Q4 – JANUARY-MARCH	<i>Paper</i>	<i>For info</i>
9 APPLICATIONS BY AGENTS AND MANDATARIES	<i>Paper</i>	<i>For decision</i>
10 CARE HOME COSTS	<i>Paper</i>	<i>For discussion</i>
11 DUTIES/NOTICES ACTION	<i>Oral</i>	<i>For discussion</i>
12 FRAMEWORK DOCUMENT	<i>Paper</i>	<i>For approval</i>
13 DATE OF NEXT MEETING		
<i>25 June 2025, St Kilda</i>		
<i>26 June 2025, St Kilda – staff day</i>		
14 ANY URGENT BUSINESS		
BREAK FOR TIER 3		
15 EXCLUSION OF THE PRESS AND PUBLIC		
16 AFTERNOON SESSION		
<i>Strategic direction of the Board</i>	<i>Oral</i>	<i>For discussion</i>

**Not in public copy*

APOLOGIES – ORAL

DECLARATIONS OF INTEREST – ORAL

CROFTING COMMISSION MEETING

7 May 2025

Report by the Chief Executive

Review of Action Points from 26 February 2025

ITEM	ACTION	RESPONSIBLE OFFICER	DEADLINE	DATE COMPLETED	COMMENTS
1	The Board will re-visit work on future options for the Croft Information database in April 2026.	DoCS/HoD	April 2026		This has been added to the May 2026 Board Planner
2	Schedule strategic discussion between Board and Senior Management on issues related to public sector reform, including reference to medium term financial planning and evolving risk appetite. In addition, schedule a discussion to agree priorities for Board development, performance management and CPD.	DoCS/CEO	May Board		2 x papers required. Being drafted by Chair.
3	Director of Operations to bring a paper to a future Board Meeting on the work of the Grazings Team	DoOp	May Board		
4	Add new risk to SRR that Board recruitment for appointments in September 2025 fails to attract the required skillset and/or experiences procedural delays and discharge item S1	DoCS	Straightaway	05/03/2025	
5	Director of Operations to put in place policy and procedural changes required to comply with the Decision of the Board to suspend any live cases where the Commission is made aware that a police investigation is underway that is material to the case.	DoOP	End of April		

MATTERS ARISING FROM PREVIOUS MINUTES – ORAL

CROFTING COMMISSION MEETING

7 May 2025

Report by the Chair of Audit & Finance Committee

Update from Chair of Committee

SUMMARY

The purpose of this paper is to provide the Board with an update of the Audit & Finance Committee meeting of 23 April 2025.

BACKGROUND

The Board has established an Audit & Finance Committee (AFC) as a Committee of the Crofting Commission Board to support Board Members in their responsibilities for issues of risk, control and governance and associated assurance through a process of constructive challenge.

CURRENT POSITION

The Committee Chair will provide Board Members with a verbal update of the AFC meeting of 23 April. Full details are in the following draft minute of the meeting.

Key points for Board Members to note –

1. The Committee welcomed Alan McLeod, who joins the Committee as a Co-Opted Member. Mr McLeod will provide the Committee with a wealth of governance and risk assurance experience while the Committee membership transitions over the reporting year.
2. We reviewed financial performance for Q4 and noted no “red issues”. The Commission has operated within its budget for 2024/25 and the outturn for the year is a virtual break-even position. Audit Scotland is commencing its statutory audit of the Commission and at the time of writing we are anticipating a positive outcome.
3. We reviewed two internal audit reports that form part of the agreed 2024/25 internal audit workplan. *Stakeholder Engagement & Communications* and *Regulatory Function Processes*. The Committee was pleased to note that both audits provided many points of good practice and assurance that processes are working well. There were several recommendations made that will further improve operational performance and the Committee has been assured that the Executive Team will discharge these recommendations swiftly.
4. The overall internal audit opinion for 2024/25, based upon all work undertaken has been of a positive nature.

5. We reviewed the Staff Survey Action Plan for 2025. Although the Commission Employee Engagement level from the most recent survey is static at 60% it is not far from the overall Scottish Government Benchmark of 64%. Due to the size of the Commission a minor change in response rate or marking can significantly skew results. The Committee is content with the arrangements in place to support colleagues.
6. Of particular interest was a summary of an annual self-assessment regards arrangements for securing Best Value. Overall, the Committee confirmed they were pleased with the Commission's performance in relation to these best value characteristics and were of the opinion that the Commission has been moving forwards in recent years.
7. We noted a positive report on complaints handling with a continuation in the downward trend in number of complaints received. The Committee is keen to promote these statistics which would be particularly useful to rebut informal feedback received from various sources on occasion that raise unsubstantiated concerns.

RECOMMENDATION

The Committee recommends that the Board should –

- **Read the Committee Paper on Best Value as but it has been a useful exercise to capture this information for future performance reference purposes.**

Date 23 April 2025

Author Mairi Renwick MacKenzie, Chair, Audit & Finance Committee

CROFTING COMMISSION MEETING

7 May 2025

Report by the Audit & Finance Committee

Annual Best Value Review Self-Assessment

SUMMARY

The Accountable Officer has a specific responsibility to ensure that arrangements have been made to secure Best Value. The Board has a corporate responsibility for promoting the efficient and effective use of staff and other resources in accordance with the principles of Best Value.

The Commission's arrangements for securing Best Value have been assessed as part of the 2023/24 audit and judged to be appropriate. Audit Scotland provided a minor recommendation that arrangements for securing Best Value could be further strengthened by incorporating an annual self-assessment in the Commission's governance procedures as a point of good practice.

<https://www.crofting.scotland.gov.uk/userfiles/file/appendices/250507/6c-AFC-Best-Value-Self-Assessment.pdf>

CURRENT POSITION

The current economic environment is one of uncertainty and organisations are being asked to find savings and reduce budgets. It is therefore important that the Commission can demonstrate the difference it is making to both the crofting community and the wider national outcomes. This report and framework can therefore be used as a management tool to help embed a culture of continuous improvement and best value throughout the Commission.

The arrangements and evidence highlighted in this self-assessment are not exhaustive but set out the extent to which the Commission is delivering against each of the Best Value themes. The Annual Improvement Report that was considered by the Committee in February 2025 provides more detail regards specific improvements.

RECOMMENDATION

The Committee's attention is specifically drawn to the Conclusion and Recommendation section of the self-assessment which is highly relevant to the Board and Ministerial priority to focus on and streamline our core regulatory function.

Is the Committee content that these are the priority areas to consider regards further improvement going forwards, or are there additional/alternative priorities that require review?

Date 27 March 2025

Author The Executive Team, Crofting Commission

CROFTING COMMISSION MEETING

7 May 2025

Report by the Chief Executive

Review of Performance Report Q4 (Jan-Mar) 2024-25

SUMMARY

The quarterly Performance Report is one of the Commission's key reporting tools, with Outcomes linked to the Corporate and Business Plans.

<https://www.crofting.scotland.gov.uk/userfiles/file/appendices/250507/Q4-January-March-Performance-Report-2024-2025.pdf>

BACKGROUND

The Performance Report is split into four sections, with information detailed against Outcomes, as follows:

Outcome One – Crofting is regulated in a fair, efficient and effective way

Outcome Two – Crofting continues to thrive and evolve

Outcome Three – Crofts are occupied and used

Outcome Four – Our workforce has the right skills and motivation, and our governance processes are best practice.

CURRENT POSITION

Most of the measures detailed in the Performance Report have a Green RAG status. Out of a total of 19 Key Milestones, one is flagged as Red and just one is at Amber, the rest being Green. This is an improvement on Q3.

Of the 16 Performance Measures, one is flagged as Red, three are Amber, the remaining measures are Green. This too is an improvement on Q3 results.

Members of the Executive Team will be present at the meeting and happy to take questions from Board members on the details set out in the report.

Impact:	Comments
Financial	Tasks detailed in the report are costed within the 24/25 budget
Legal/Political	N/A
HR/staff resources	Staff resources from all teams are expended delivering the targets outlined in the report.

Date: 7 April 2025

Author: Jane Thomas, Director of Corporate Services

CROFTING COMMISSION MEETING

7 May 2025

Report by the Chief Executive

Review of Strategic Risk Register – Q4 (Jan-Mar) 2024-25

SUMMARY

The Committee is invited to note and comment on the Strategic Risk Register, which has been updated by the Executive Team, prior to its presentation to the Board.

<https://www.crofting.scotland.gov.uk/userfiles/file/appendices/250507/Strategic-Risk-Register-Q4-2024-25.pdf>

BACKGROUND

The Strategic Risk Register is reviewed by the Committee at each of its quarterly meetings and then by the Board at the meeting following AFC meetings.

Azets have recommended that a cover paper should be prepared by the Executive Team to highlight key points. This paper provides that analysis in the form of four tables.

POINTS TO NOTE

HIGHEST OVERALL RISKS (score 100+)			
<i>Ref no</i>	<i>Topic</i>	<i>Risk score</i>	<i>Comments</i>
S13	Board Recruitment	100	Discussions ongoing with sponsor division to mitigate risk.

NEW RISKS			
<i>Ref no</i>	<i>Topic</i>	<i>Risk score</i>	<i>Comments</i>
S13	Board Recruitment	100	Discussions ongoing with sponsor division to mitigate risk.
S14	Status of Commission Staff	30	Discussions ongoing with sponsor division to mitigate risk.

RISKS THAT ARE INCREASING (since last update)			
<i>Ref no</i>	<i>Topic</i>	<i>Risk score</i>	<i>Comments</i>
No risk is increasing. Static or falling since Quarter 3.			

RISKS WHICH COULD POTENTIALLY HAVE THE MOST SERIOUS CONSEQUENCES (Current impact 25 or 50)			
Ref no	Topic	Current impact score	Comments
S7	RALUT	25	It is important to maintain a strong Residency and Land Use team to continue addressing and resolving breaches of crofting duties, contacting those who do not respond to the annual notice, absentee landlords of vacant crofts and failed successions.
S9	Budget	25	The overall current risk score decreased in Quarter 3, and an area of regular discussion with SG Sponsor.
S13	Board Recruitment	25	Discussions ongoing with sponsor division to mitigate risk.

RISKS WHICH ARE MOST LIKELY TO TRANSPIRE (Current likelihood 4 or 5)			
Ref no	Topic	Current likelihood score	Comments
S2	Inconsistent regulatory decisions	4	Increased by Solicitor in Q4 2023/24. Static in all quarters in 2024/25.
S5	Credibility of crofting	4	Need to progress work of Policy, Projects & Research team alongside the more established RALUT and grazings teams to ensure we are encouraging new entrants and active crofting, plus need for comms activity to highlight the continuing benefits of crofting.
S11	Take-up of online applications	5	While the system is working well and popular with users, reaching the potential levels of use depends on resolving key issues with Registers of Scotland, especially about fraud prevention. Changes in secondary legislation are required.
S13	Board recruitment	4	Regular meetings and dialogue with Sponsor Division to keep timeline for appointments on track.

RISKS THAT THE EXECUTIVE RECOMMENDS ARE DISCHARGED		
Ref no	Topic	Comments
S12	New Chair and possible Board member requires appointment in Autumn.	This risk is redundant. Officials recommend it is discharged.

RECOMMENDATION
The Audit & Finance Committee is invited to comment on the content of the Strategic Risk Register and confirm whether it should be forwarded to the Board in its current format.

Date 09 April 2025

Author: Executive Team, Crofting Commission

CROFTING COMMISSION MEETING

7 May 2025

Report by the Director of Operations

Applications by agents and mandataries

SUMMARY

At the November 2024 Board meeting, the Board was presented a paper suggesting changes to how it handles agency and mandataries, all of which were accepted by the Board. During exploration of implementation, Commission officials wish to revise these recommendations. These revisions are outlined in this paper.

BACKGROUND

The Crofting Commission has reviewed its process and policy around agency and mandataries on its regulatory applications, most recently in a paper which was presented to the Commission Board in November 2024. In this paper the Board were presented recommendations to alter the policy on how agency and mandate was accepted, as follows:

1. The Commission will accept applications from Professional agents in the manner that it does currently.
2. The Commission will accept applications from Business agents in the manner that it does currently but will make the checks outlined in the paper when a new agent contacts the Commission for the first time.
3. The Commission will only accept an individual acting as an agent or mandate in a non-professional or business capacity once they have completed the same ID verification that Registers of Scotland (RoS) require in the same situation.
4. The Commission will not accept any agent's application where it becomes apparent that the agent is the ultimate beneficiary of the application that they have submitted.

The primary change to this process was around non-professional individuals acting as agents or mandataries unless undergoing a verification process similar to that undertaken by Registers of Scotland.

The Board approved this paper and all officials' recommendations, and it was given to officials to implement. A working group was set up for this, however while fully exploring this additional points were raised and officials now wish to revise their recommendations. The revisions, and reasons for them, are detailed in this paper.

REASONS FOR CHANGED RECCOMENDATIONS

The paper presented in November 2024 had an intent of strengthening antifraud measures within the Commission, and protecting crofters. However when looking at confirmed fraud cases, defined as circumstances where a criminal intent of committing fraud was established, Commission officials cannot establish any within the preceding 10 years. The Commission solicitor has noted that the Commission may not be specifically made aware of a criminal

outcome, however it is likely that it would be aware if it involved a determination on a Regulatory application. This is an important factor when establishing the level of risk, and officials feel they may not have accurately conveyed this to the Board in previous papers. As such, the recommendations, which were in themselves in response to a request for an additional paper following on from the October 2024 Board meeting, may have given an incorrect picture of the frequency of confirmed criminal fraud.

This was suggested by the Commission solicitor in the October 2024 paper, in which was stated:

“Fortunately, there is little in the way of third-party fraud by unknown parties that affects Commission processes. Less fortunately the Commission, from time-to-time, is asked to provide consent in the context of inter-family assignments where there is a family dispute and/or there are concerns about the capacity of the crofter.”

One recommendation presented in the November 2024 paper proposed to apply a process similar to that employed by RoS for non-professional agents, which entailed a full identity check by a recognised certifier. However this process, although employed by RoS, is applied to applications to the Land Register, but is not applied to any crofting applications. All RoS crofting applications are subject to a mandate process whereby an agent need only be named (<https://www.crofting.scotland.gov.uk/userfiles/file/appendices/250507/RoS-form-A.pdf>). For a RoS crofting form there is no requirement to note the capacity under which the agent is acting on the applicant’s behalf (professional agent, solicitor etc). Officials wish to clarify this point in addition to the above point on the confirmed risk of criminal fraud.

In addition, the recommendation that non-official agents have to carry out a verification check appears to offer a level of assurance that the individual is who they state they are. However it does not appear to offer any further assurance that the party acting as agent has the correct authority to act as agent on behalf of the named applicant. As such this process would seem to offer no additional assurance in alleviating the primary concern previously noted around cases of inter family fraud where the pertinent point is if a family member has the authority to act, rather than that they are who they state they are. Officials, upon further consideration, feel this is an important point that may not have been fully considered in previous recommendations.

REVISED RECOMMENDATIONS

Commission officials have reconsidered their advice to the Board based on the above additional clarifications, and on revisiting the previous legal advice obtained from Brodies in relation to digital signatures and identity verification. These are the two key points, however a range of other evidence contributed to the revised proposals.

If the Commission operates a policy of not allowing non-professional agents, it will be in direct contradiction to Scots law which expressly allows the use of a mandatary, though the Commission Solicitor has confirmed that the Commission can impose additional measures if it feels this is needed. However, the previously proposed changes appear disproportionate to the risk they seek to mitigate, and do not directly address the main identified risk. The Commission also employs numerous other methods to ensure that applications are advertised, and objectors have the opportunity to raise concerns or objections. As such, the previously proposed changes may, upon further consideration, have been disproportionate to the level of risk they sought to mitigate.

The recommendation of this paper, for all agent types including legal agents, is that a signed mandate form is reintroduced that expressly gives the named party permission to act on behalf of the applicant for each application. This directly provides the Commission with an evidential record that the applicant has named a third party to act on their behalf and aligns the Commission with the legislation surrounding the use of non-professional agents.

In addition, it is suggested that the Commission introduce a letter at the point of receipt of any application using any form of agent as an additional measure. This would be sent to applicants at their known address details to confirm that the Commission has accepted the named agent to act on their behalf. This measure would show that the Commission is taking all reasonable steps to protect crofters from agents acting without consent.

It is additionally recommended that the Commission adopt a similar process for digital applications, using the simple electronic signature. The previous report supplied by Brodies around the use of the simple electronic signature attributed it the same legal weight as a non-probative wet signature. As all other safety measures (advertising etc) still apply to digital applications, if the Brodies advice is accepted there is no evidence to suggest that the digital process offers any greater risk.

Officials agree that the proposal to restrict agents from being beneficiaries remain intact. However that additional detail is added confirming that a valid power of attorney supersedes this and is acceptable. This would address a situation whereby a family member with a power of attorney for an elderly relative may, for example, assign a croft to themselves if the Commission is satisfied that the power is appropriate to allow this and valid.

SUMMARY

Officials would like to revise their previous proposals around changes to the Commissions policy on agency and mandate, based on further detailed consideration by a working group comprised of expertise from across the Commission.

Recommendation 1

The Commission introduces a signed mandate form for all types of agents, including a digital equivalent.

Recommendation 2

The Commission introduce a letter at that point of application receipt to known details for the main applicant to confirm that an application has been received and the agent named.

Recommendation 3

That the Board confirm that they wish to continue restricting the agent from being a direct beneficiary, with the exceptions noted.

Impact:	Comments
Financial	There will be a minor financial implication to the Commission to alter its application forms, however it should be noted that this applies to either the changes agreed in November 2024 or in this paper.
Legal/Political	There is a potential risk to the Commission should it continue to restrict the use of a mandatory or impose additional measures that may be perceived to not directly reduce the risk they were designed to prevent. This could present a reputational or legal risk.
HR/staff resources	There is a minimal implication on staff time for initial implementation to change forms and CIS workflows.
Consumer Duty Guidance	Officials have considered the impact on crofters. The previously proposed ID verification process may result in a more costly or lengthier process for crofters.

RECOMMENDATION

The Board is invited to review the proposals in this paper and decide how they wish the Commission officials to proceed.

Date 23 April 2025

Author Aaron Ramsay, Director of Operations

CROFTING COMMISSION MEETING

7 May 2025

Report by the Chief Executive

Care home costs

SUMMARY

The question of care home costs and tenanted crofts was raised at a meeting with crofters in the Western Isles in 2024. This issue was previously discussed by the Board in 2020 but the final action at that time – to discuss the Commission's position on the matter and any next steps in public – was never completed. This paper is to reach a conclusion on this issue. In conclusion, crofting legislation is silent on whether a croft is an asset for the purposes of the calculation of a contribution to care home costs. As such, the opinion of Crofting Commission (CC) officials is that status of a croft in these circumstances is not something the Crofting Commission would become involved in. In addition, the opinion of CC officials is that should any prospective tenant have concerns that a local authority may retrospectively attempt to recover costs from them for a previous tenant's care home costs, this is not a matter that is of concern to the Crofting Commission, and they should seek relevant professional advice on the matter. The Board is asked to discuss the issues and make a policy recommendation.

BACKGROUND

The question of care home costs and tenanted crofts was raised at a meeting with crofters in the Western Isles in 2024. They asked what the Commission's position was on the matter. In researching this, it was noted that this subject had been a Board agenda item in the past. This was in 2020 but the final action at that time – to discuss the Commission's position on the matter and any next steps in public – was never completed. This paper outlines the latest issues that have become apparent and links to the previous papers from five years ago to both complete that action from that time and work out what, if any, actions the Commission now has to take.

CURRENT POSITION

It is apparent that some crofters are having the value of their tenanted croft holding decided by the district valuer of some local authorities. This occurs when the crofter enters local authority funded care. The process of valuation is to ascertain the value of their assets to then help calculate any contribution they must make towards care home costs. It is important to note that in the cases described to us, the crofter had not asked for the valuation – it was done without their consent by their Local Authority (LA). The crofters concerned felt that this was pressurising them to sell their tenancy for the highest price, whereas they could legally assign for no cost should they wish. It is not clear what the LA position is on value if the crofter doesn't sell but merely assigns.

In 2020, a similar concern on the same topic was brought to the Board – the minutes are here: <https://www.crofting.scotland.gov.uk/userfiles/file/appendices/250507/Final-Minute-Special-Meeting-30-June-2020.pdf> – but the final action was not undertaken so the paper effectively remains open. In essence, in 2020 the Commission concluded that because a croft can be included in the assets of an individual when calculating their contribution to care home costs, had the tenancy been assigned/sold to others beforehand, it may be seen by the LA as an attempt to remove the croft from the assets of the crofter, potentially allowing the LA to take action to then recover the croft from the new tenants in the future. The conclusion in 2020 was that this should be further discussed in a public meeting which, as already noted, was never done. It is therefore implicit in the 2020 minuted decision that Commission recognises that a tenanted croft does form part of the assets of a crofter for care home cost calculation purposes

GOING FORWARDS

Commissioners are invited to discuss this matter, finalise any discussions from 2020 that are still relevant and make a policy recommendation should they wish. In doing so, Commissioners should consider the following:

As noted in the 2020 paper, none of the issues raised at the time was (or is now) covered by crofting legislation so is it even in the locus of the Commission to consider, and;

With regards to the recent question on whether the Commission has a position on whether a crofting tenancy should be disregarded when it comes to assessing the value of an individual's assets, again, there is no provision in the crofting legislation to enable to Commission to make a decision on this

RECOMMENDATION

The 2020 paper refers to a considerable amount of case law which has been used determined the status of a croft in terms of being an asset of a crofter or deceased crofter. Alongside this, crofting legislation is silent on whether a croft is an asset for the purposes of the calculation of a contribution to care home costs. The opinion of CC officials is that status of a croft in these circumstances is a matter for the crofter, the LA in question and their professional advisers. With regard to the 2020 question, the opinion of CC officials is that should any prospective tenant have concerns that an LA may retrospectively attempt to recover costs from them for a previous tenant's care home costs, this is not a matter that is of concern to the Commission and they should seek relevant professional advice on the matter.

Impact:	Comments
Financial	No financial implications.
Legal/Political	The Commission at present may find itself in a conflict with LA and SG if it takes a position on croft values and LA Care Costs Alternatively, there may be pushback from the crofting community if the Commission takes no action
HR/staff resources	N/a

RECOMMENDATION

Commissioners are invited to, take account of the recommendations, discuss this matter and make a policy recommendation.

Date 2 April 2025

Author Gary Campbell, CEO

DUTIES/NOTICES ACTION - Oral

CROFTING COMMISSION MEETING

7 May 2025

Report by the Chief Executive

Framework Agreement

SUMMARY

This paper is for the Commission Board to consider the recently updated framework agreement for approval.

BACKGROUND

The Crofting Commission's framework agreement with the Scottish Government has to be revisited at regular intervals. The most recent revision has just taken place in conjunction with Commission Officials and the Chair of the Board and has now been signed off by the Minister. To complete the process, it must be presented to the Commission Board for approval. A copy of the agreement is here:

[Crofting Commission - SPFM Model Framework Document - 9 April 2025.pdf](#)

Impact:	Comments
Financial	None
Legal/Political	Forms an integral part of our relationship with SG
HR/staff resources	No additional resource required

RECOMMENDATION

Commissioners are invited to review and approve the framework agreement as signed by the Minister.

Date 23 April 2025

Author Gary Campbell, CEO

DATE OF NEXT MEETING

25 June 2025 - St Kilda

ANY URGENT BUSINESS

EXCLUSION OF PRESS & PUBLIC

STRATEGIC DIRECTION OF THE BOARD - Oral