



General Purposes Committee
27th September 2006

**Report from the Director of Finance and
Corporate Resources and the Director of
Human Resources and Diversity**

For Action

Wards Affected:
ALL

A New Council Severance Scheme

1.0 Summary

1.1 The Council currently exercises its discretion to award compensatory added years on the grounds of redundancy or efficiency under the Local Government (Early Termination of Employment)(Discretionary Compensation)(England and Wales)Regulations 2000. Draft regulations propose the removal of this discretion from 1st October 2006. They allow local government employers the discretion to set up a severance scheme that pays a maximum 104 weeks' pay. This report proposes a contingent severance scheme for Council employees (other than employees working in schools maintained by the Council and teachers employed in units other than schools) should the draft regulations be enforced on the aforementioned date or some later date.

2.0 Recommendations

2.1 Members note that the Council must formulate, publish and keep under review a policy under the proposed Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006.

2.2 Members note that if the final version of the regulations appears to officers to be significantly different from the draft regulations mentioned in 2.1 above a further report will be made to this committee.

2.3 Members note that the recommended severance arrangements may be subject to future amendment to ensure consistency with developing Council strategies and policies.

2.4 Members note that the current Discretionary Payment Regulations require that the Council publish a statement of changes made to its policies within one month of the date of the decision and that the Council must not give effect to any policy change until one month has passed since the date of publication

of that statement. This has a bearing on the temporary measures mentioned in 3.22 as these temporary measures will involve a change from current policy in the way that CAY is awarded.

- 2.5 That the weekly pay used to calculate statutory redundancy payments under the Employment Rights Act (ERA) continue to be based on actual gross contractual pay and not the statutory maximum set under the ERA – currently £290.00.
- 2.6 If the draft regulations (whether as currently drafted or with amendments that do not appear to officers to be significant) become law on 1st October 2006 or some later date, the Council adopts as from the date the draft regulations become law in respect of Council employees who are not working in maintained schools and who are not teachers the severance policies set out in paragraphs 3.20,3.21 and 3.29(i) and (ii)
- 2.7 As from 1st October 2006 an award of compensatory added years (CAY) can still be made if permitted by the Discretionary Compensation Regulations. As from the earliest date the Discretionary Compensation Regulations permit a change in Council policy on the award of CAY to be given effect no such award is to be made or agreed to be made by officers without the prior authorisation of the Director of Finance and Corporate Resources. From the 1st October 2006 to that earliest date no Council employee to whom this report applies is to have his/her employment with the Council terminated on the grounds of redundancy or efficiency without the prior authorisation of the Director of Finance and Corporate Resources. The making of such an award would preclude the making of a severance payment as set out in paragraph 3.23.
- 2.8 The Director of Finance and Corporate Resources is authorised:
- (i) to approve exceptional circumstances severance payments in the case of redundancy as set out in paragraph 3.21.
 - (ii) to decide in any particular case the amount of CAY to award as set out in paragraph 3.23.
 - (iii) in consultation with the Director of Human Resources and Diversity and the Borough Solicitor to develop a written procedure governing how requests for exceptional circumstances severance payments are to be made and dealt with.
 - (iv) in consultation with the Director of Human Resources and Diversity and the Borough Solicitor to develop a written procedure concerning how requests for authorisation by him/her of severance payments on the grounds of efficiency are to be made and dealt with.
- 2.9 The Council amends its Managing Change policy to incorporate changes which the Director of Human Resources and Diversity considers are consequential on the adoption by Members of recommendations 2.6 to 2.8.

3.0 Detail

3.1 Current Arrangements

3.2 Since 1976 there have been special provisions available to local government employers to make discretionary payments to employees whose employment has been terminated on the grounds of redundancy or efficiency. There have been various amendments to the governing regulations over the years. The regulations in force now for employees other than teachers are the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2000 (these will be referred to as the DCR for the remainder of this report). The Council has exercised its discretionary powers under the DCR to:

- (i) Award compensatory added years
- (ii) Base redundancy payments on actual gross contractual weekly pay and not the statutory maximum set under the ERA. The statutory maximum for 2006/7 is £290.00.

3.3 The policy that has been in place since 1998 allows additional pension benefits, payable from the Council's general fund. The additional benefits are based on an award of compensatory added years (CAY). The policy currently allows an award of no more than 6 2/3 years to staff who are members of the Local Government Pension Scheme. The award is limited to 1/4 of a year for each year of Brent service for staff under age 55 on the termination date and 1/3 of a year for each year of Brent service for those aged 55 or over. In both scenarios the CAY is also increased/reduced where the employee's pay is less than/ exceeds £25617 p.a. Examples of the formulae are given below:

3.4 Under age 55:
$$\text{Brent service} \times \frac{1}{4} \times \frac{\text{£25617}}{\text{pensionable pay}}$$

3.5 Age 55 or over:
$$\text{Brent service} \times \frac{1}{3} \times \frac{\text{£25617}}{\text{pensionable pay}}$$

3.6 The resultant CAY is used to calculate pension benefits in addition to the pension and lump sum payable under the LGPS. The DCR prescribes the formula for additional pension benefits as follows:

3.7
$$\frac{1}{80} \times \text{pensionable pay} \times \text{CAY (see 3.4 and 3.5)} = \text{pension}$$

3.8
$$\frac{3}{80} \times \text{pensionable pay} \times \text{CAY (see 3.4 and 3.5)} = \text{lump sum}$$

3.9 The DCR requires that recipients have at least 5 years' service and be aged at least 50. It disallows payments of CAY to staff aged 65 or over on the termination date. The Government now believes that it is necessary to revoke the DCR and replace them with new regulations to comply with the age-related provisions of the European Employment Directive which will be

implemented through the Employment Equality (Age) Regulations, due to come into force from 1 October 2006.

3.10 It is the Government's position that the age and length of service-related formula that governs the amount of the pension benefits that may be made to eligible non – teacher employees upon the early termination of their employment would be discriminatory under the Age Regulations and it does not believe it is appropriate to seek to objectively justify the potential discrimination. Accordingly the draft Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006 do not contain any power for local authorities to award CAY. They propose:

- (i) Continued discretion to base redundancy payments on actual gross contractual weekly pay rather than the statutory maximum under the ERA
- (ii) That local authorities have the discretion to make severance payments up to a maximum of 104 weeks pay inclusive of the statutory redundancy payment.

However officers understand from enquiries made with the Government and Local Government Employers that as a result of late representations made by the trade unions that the new regulations may not come into force on 1st October 2006 but rather on a later date, which the Government intend to be as soon as possible after 1st October 2006. It also appears that the Government are considering amending the draft Regulations to allow the award of CAY after the Regulations come into force in certain time - limited situations e.g. where negotiations over severance payments to staff were under way as at 1st October 2006.

3.11 As a consequence of section 37 of the Education Act 2002 where an employee is based in a school maintained by the Council with a delegated budget then the decision whether to exercise the discretions in 3.10 will be for the school's governing body to take. The Council will be responsible for making the payments to the employee as decided by the governing body. These obligations to pay apply even if the school's governing body is the employer i.e. the school is a foundation or voluntary aided school. However under section 37 the Council may deduct these payments from the school's budget share if it has good reason to do so. In addition the DCR do not apply to teachers as there are separate regulations concerning payment of compensation for redundancy and premature retirement to them. A further report will be made to this committee in due course covering severance arrangements for Council employees working in maintained schools and teachers working in units other than schools.

3.12 A New Severance Scheme:

3.13 The Council is not obliged to have a severance scheme. Where a member of staff is made redundant the Council is required to pay no more than the statutory amount required under the ERA. This is based on a week's pay (up to

the statutory maximum – see para 3.2(ii)). The payment is based on age and service as follows:

- (i) Up to the age of 22 - 0.5 week's pay for each completed year of service
- (ii) 22 - 40 years of age - 1 week's pay for each completed year of service
- (iii) 41 years of age or older - 1.5 weeks' pay for each completed year of service

3.14 Members should note that the age and service criteria for statutory redundancy payments under the ERA are exempt from the forthcoming age discrimination legislation. This point is discussed in greater detail in paragraph 5.2.

3.15 There is no statutory requirement to make payments where employment ceases on efficiency grounds.

3.16 Officers propose that for Council employees who are not employed in maintained schools and who are not teachers the Council operates a severance scheme where the employee's employment is terminated by reason of redundancy that allows payments above those required under the ERA because:

- (i) Employing the minimum scheme would limit the Council's ability to manage workforce reduction and change as there would be no incentive for staff to take voluntary redundancy
- (ii) Only operating with compulsory redundancies has an impact on employee relations, workforce moral and the Council's image externally as an employer of choice
- (iii) The use of a minimum scheme is out of step with other local government schemes. In a recent survey conducted by the Local Government Employers showed that out of 26 respondents only 1 used the minimum scheme and did not use actual pay,
- (iv) The proposed multiplier of 1.5 times salary was used by 3 other councils with most authorities using a multiplier of 2 or above.
- (v) The Council's approach to severance forms part of the employment package and therefore a scheme that is poorer by comparison than other similar employers acts as a disincentive to recruiting the best staff particularly at senior levels.
- (vi) Both CAY and redundancy payments based on actual gross contractual pay have been awarded by the Council for more than a decade. Staff may have a contractual expectation that redundancy payments will be based on actual gross contractual pay

It is also proposed this scheme will take effect on 1st October 2006 or such later date on which the draft regulations come into force. If the final version of the regulations appears to officers to be significantly different from the draft regulations then a further report will be made to this committee.

- 3.17 The issue raised 3.16 (vi) is discussed in detail in the Legal section of this report.
- 3.18 There are a number of scheme models that the Council may choose for future severance payments where an employee is made redundant. These are summarised below:
- (i) Paying only the statutory redundancy payment
 - (ii) Using the statutory redundancy formula but base it on an actual week's pay
 - (iii) Apply a multiple to the statutory weeks calculated under the ERA and or a multiple to the result
 - (iv) Using a different method of calculating severance payments, either based on non-age related criteria or criteria that takes into account age and length of service, where objectively justified
 - (v) Paying the same number of weeks / months pay to everyone regardless of age or service
 - (vi) Paying the same sum to everyone regardless of age or service
 - (vii) Awarding additional membership under LGPS regulation 52 (plus, in the case of redundancy, the statutory redundancy payment or the redundancy payment based on an actual weeks pay)
 - (viii) Providing either enhanced payment under the '104 weeks' provision or additional membership under LGPS regulation 52 depending on the age of the employee, if making different types of award to different groups can be objectively justified
 - (ix) Provide the option of an enhanced payment under the '104 weeks' provision, or the amount of additional membership that could be purchased in the LGPS by the amount by which the enhanced payment exceeds any redundancy payment (in the latter case the redundancy payment would still be payable).
- 3.19 Members will note the variety of options open to the Council. All but part application of the model given in 3.18 (iii) have been rejected at this time due to their potential complexity, expense, non compliance with age discrimination legislation (or other potential diversity issues) implications for managing workforce change and recruitment/retention or a combination of these.
- 3.20 It is proposed that the total severance payment (including the statutory redundancy payment) will, in all but wholly exceptional circumstances, be equal to a payment where a multiple of 1.5 is applied to the weeks used to calculate a redundancy payment under the ERA.
- 3.21 Where the Council has a discretionary power it cannot fetter its discretion by adopting a blanket policy concerning how it exercises that power without taking into account the circumstances in each case. Accordingly it needs to be able , subject to the 104 weeks' pay maximum, in special circumstances to make a total severance payment which exceeds the amount that would

otherwise be payable under the scheme. It is therefore proposed that the Director of Finance and Corporate Resources is authorised to decide whether in any particular case in response to a request from the employee concerned there are wholly exceptional circumstances justifying the Council making a total severance payment on the grounds of redundancy which exceeds the amount that would otherwise be payable under the scheme, and if s/he is satisfied such circumstances apply to decide the amount of the total severance payment to be paid.

3.22 As stated there is a possibility that the new DCR will give the Council the discretionary power to award CAY in certain time limited situations even after the new DCR take effect. The new DCR may also come into force after rather than on 1st October 2006 with the result that the old DCR will carry on for a period after 1st October 2006. However there is a real risk that any award of CAY made on or after 1st October 2006 would be unlawful age discrimination. The old DCR require that a statement is published within one month of the date of the decision to alter a policy concerning the award of CAY. They also require that the new policy may not take effect until one month following the publication of the statement. Accordingly a change in the way that CAY is awarded under the old regulations may not take place until after the above criteria have been satisfied.

3.23 It is therefore proposed that as from the 1st October 2006 awards of CAY may continue to be made if permitted by the DCR. However as a safeguard it is also proposed that as from the earliest date the Discretionary Compensatory Regulations permit a change in Council policy on the award of CAY to be given effect an award of CAY cannot be made or agreed to be made by officers without the prior authorisation of the Director of Finance and Corporate Resources . As a further safeguard from the 1st October 2006 to that earliest date no Council employee to whom this report applies is to have his/her employment with the Council terminated on the grounds of redundancy or efficiency without the prior authorisation of the Director of Finance and Corporate Resources. That Director would also be authorised from that earliest date to decide in any particular case having regard to its merits the amount of CAY to award. An employee made such an award would not also be entitled to a severance payment under the proposed scheme in excess of a statutory redundancy payment calculated on actual gross contractual pay.

3.24 The scheme at 3.20 and 3.21 is proposed because it would:

- (i) be straight forward and easy to operate
- (ii) transparent in the vast majority of cases and easy for staff to understand
- (iii) ensure in the vast majority of cases equal treatment of staff
- (iv) the vast majority of cases be definitely compliant with age discrimination legislation
- (v) be affordable

3.25 An example of how a severance payment under the new scheme would normally be calculated is set out below:

3.26	Age:	40
	Pay:	£35000 (£671.23 per week)
	Service	20 years
	Number of weeks' pay derived from ERA Ready Reckoner	19
	Brent multiplier	1.5

Severance Calculation:

19 x 1.5 = 28.5 x £671.23 = £19130.05

Statutory Redundancy:

19 x 671.23 = £12753.37
Total Severance £ 6376.68

3.27 The severance scheme is exempt from the Employment Equality (Age) Regulations provided it mirrors the ERA redundancy provisions. This is the case for payments under the scheme, with the exception of enhanced payments made because of wholly exceptional circumstances. To ensure the severance scheme mirrors the ERA redundancy provisions there would be:

- (i) no lower or upper age limits below or above which employment would not count in calculating the severance payment
and
- (ii) no requirement to be a member of the LGPS
and
- (iii) previous continuous employment with a body covered by the Redundancy Payments (Continuity of Employment in Local Government ,etc) (Modification) Order 1999 (e.g. another local authority) must be taken into account

In order to be eligible for a severance payment the employee would normally have to be entitled to a redundancy payment under the ERA. Accordingly those employees who did not have 2 years' continuous employment or who unreasonably refused an offer of suitable alternative employment would not normally be entitled to a severance payment.

3.28 It is also proposed the Director of Finance and Corporate Resources is authorised, in consultation with the Director of Human Resources and Diversity and the Borough Solicitor, to develop a written procedure governing how requests under paragraph 3.21 are to be made and dealt with.

3.29 Officers consider that it would be inappropriate for the Council to adopt a formula for calculating compensation on termination in the interests of efficiency. Cases where payments are made for such reasons are much more likely to be "one-offs" where it may be more appropriate to take into account individual circumstances. It is therefore proposed that as from 1st October 2006 or such later date on which the draft regulations come into force:-

- (i) Subject to the 104 weeks' pay maximum, whether such a payment is made and if so the amount paid should depend on the circumstances of the individual case.
- (ii) In order to ensure as far as possible that the making of such payments would withstand challenge by the external Auditor such a payment cannot be made or agreed to be made by officers without the prior authorisation of the Director of Finance and Corporate Resources.
- (iii) The Director of Finance and Corporate Resources is authorised, in consultation with the Director of Human Resources and the Borough Solicitor, to develop a written procedure concerning how requests for such authorisation are to be made and dealt with.

4.0 Financial Implications

- 4.1 Regulation 7 (4) of the draft DCR requires that the Council has regard to
- (a) "...the extent to which the exercise of their discretionary powers (in accordance with the policy), unless properly limited could lead to a serious loss of confidence in the public service
 - (b) Be satisfied that the policy is workable, affordable and reasonable having regard to the foreseeable costs
- 4.2 Officers have considered the potential impact of the new scheme in accordance with (a) and (b) above.
- 4.3 Additionally an officer review of Council discretions that took place in 2005 included the current compensation scheme. The review found a trend of reducing awards of CAY. Officers felt that this combined with the requirements of the forth coming age legislation were reasons to reduce the awards made under the current compensation scheme. An officer report proposing this would have been made to this committee in the absence of the draft DCR 2006. It is appropriate that the Council considers a cost effective severance scheme in the light of these factors also.
- 4.4 The current severance scheme is available to a limited number of staff that are:
- (i) Aged between 50 and 64
 - (ii) Have at least five years' service
 - (iii) Members of the Local Government Pension Scheme
- Members should note that the new scheme would be available to most Council staff for the reasons stated in paragraph 3.27. As the availability of the scheme would be greatly increased it follows that potential payments should reflect this.
- 4.5 Officers have considered potential payments that could be made on factors (1.5, 2, 2.5, 3 and 3.46) and applying these to examples based on variations in age, sex, service and pay. In order that the potential scheme could be functional in the management of change a factor of 1.5 was considered the lowest factor. The largest factor of 3.46 represents the highest potential payment that the draft DCR allow i.e.

4.6

3.46 x 30 (maximum weeks awarded under ERA) = 104 weeks rounded.

4.7

In examples where the age exceeded 50 the severance payment payable under the proposed scheme has been compared with the lump sum and pension payments that would have been made in the pensioner's lifetime, under the current scheme (based on the mortality of Brent scheme members). The new scheme payment fell below the total of those made under current compensation arrangements in the majority of cases. In the minority of cases the new scheme offered higher payments in examples with high previous local government service (used in the calculation of statutory redundancies) and low Brent service (used to calculate added years in the current scheme). Although these cases individually represent an increased cost, overall the scheme should be a saving against the current arrangements if the current trend of low redundancies continues. A typical example is given below:

4.8

Age:	50
Brent Service:	5 years
Local government service	20 years
Pay:	£25k
Sex:	Male

New Severance Scheme:

Amount in excess of a statutory redundancy payment:	£5873.29
---	----------

Current Scheme:

Pension:	<u>£400.27</u>
Payment over lifetime – 400.27 x 34	£13609.18
Compensation Lump Sum	<u>£ 1200.80</u>
Total lifetime payment	<u>£14809.98</u>

4.9

In consideration of the new scheme officers also referred to actual redundancies that took place in the period 2005/06. In that tax year 10 staff were made redundant and of those 8 were entitled to CAY under the existing scheme. In order to compare the cost of the old scheme and that set out in paragraphs 3.20,3.21 a projection of the payments made in year one (in consideration of short term budget planning) and over the CAY recipients' life time was made. This was then compared with the severance payments that would have been made to all relevant employees made redundant in that tax year, including those not entitled to CAY, under new arrangements. The results are shown below:

4.10

Data from 2005/06:

CAY payments (year 1)	=	£77.5k
CAY payments (life time)	=	£471k.
Total under new scheme	=	£74k.

4.11

Members should note that the above figures are based on low numbers of redundancies and that awards of CAY have varied due to various factors. The

figures derived in 4.7 – 4.9 represent a snap shot of the position in the 2005/06 tax year only.

- 4.12 As stated the new scheme would provide severance arrangements for the majority of staff – a significant increase in potential recipients. In considering this issue Members are reminded that:
- (i) Managing change often results in the award of services to outside contractors. In these instances staff are normally TUPE transferred to the winning bidder. In such circumstances redundancy would not apply
 - (ii) Younger staff will have lower levels of service and pay. Severance payments would be correspondingly low.
 - (iii) The low instances of staff made redundant. From April 2001 to 31st August 2006 there has been a total of 101 staff made redundant (an average of 20 per annum).
 - (iv) 85% of non-teaching staff are members of the Local Government Pension Scheme. Members above age 60 may retire voluntarily with immediate access to their pension and lump sum. Older members are therefore more likely to retire than be made redundant.
 - (v) Officers are currently considering a flexible retirement policy required under the LGPS. A future policy would allow staff over 50 to reduce their responsibilities and, in agreement with the Council, receive pension benefits whilst still employed. Thus redundancy could be avoided. Proposals regarding a Council policy will be the subject of a future report to this committee.
- 4.12 All payments set out in the report are met from the General Fund and charged to the Service Area where the redundancy occurred. A business case therefore needs to be established when redundancies are considered. The new Severance Scheme proposed will mean costs will be met when the employee leaves rather than under the current scheme where the redundancy payment and CAY lump sum is funded immediately and the annual pension relating to the CAY is paid over an extended period.
- 4.13 In considering the proposed scheme Members will need to balance the potential cost, which will be dependent on the number and employment terms of staff made redundant in each year, and the benefits of flexible management of the workforce set out in the report. There is the potential to make the scheme either more or less generous although early indications are that the proposal is not out of step with other authorities.

5.0 Legal Implications

- 5.1 The Council has since the early 1990s paid redundancy payments in all cases as a matter of routine based on actual gross contractual pay rather than on the applicable statutory ceiling for a week's pay. This policy has been publicised to Council staff. Case law indicates that in these circumstances it is likely that it has become an implied term in the contracts of existing Council employees that a redundancy payment will be paid on the basis of actual

gross contractual pay. However if it was a specific term in an employee's contract that redundancy pay would be based on the applicable statutory ceiling for a week's pay (which is not the case in current contracts) then this term would apply and not the implied term.

- 5.2 Regulation 33 of the Employment Equality (Age) Regulations 2006 exempts from the Regulations the provision of enhanced redundancy payments to employees, provided they are calculated in certain specified ways. The proposed severance scheme in the case of redundancy falls within this exemption, with the exception of the proposed exceptional circumstances payments. The ability to make such payments does ensure the Council will comply with its legal obligations not to adopt rigid policies in connection with its discretionary powers under the draft DCR. As a result of the exemption an employee who received a severance payment for redundancy calculated in the normal way could not complain of age discrimination under the Regulations if another employee received a larger severance payment which had been calculated in the normal way. Because an exceptional circumstances payment is outside the scope of the exemption it would open to an employee who received a lower payment than an exceptional circumstances payment to complain of age discrimination. Accordingly in deciding whether to make an exceptional circumstances payment the Director of Finance and Corporate Resources would need to consider the risk of such a claim being successfully brought if the payment was made.
- 5.3 Severance payments made on the grounds of efficiency are not exempted from the Age Regulations. However such payments would still be lawful under the Regulations provided that in deciding whether to pay them and if so the amount to be paid factors that directly or indirectly age discriminate (such as age or length of service) are not taken into account or, if they are taken into account, the Council can objectively justify the use of these factors
- 5.4 In order to ensure that the Council will be in a position in future to revise the redundancy severance scheme without such a revision being successfully challenged by staff as a breach of contract it is suggested that when the scheme is publicised to staff it is made clear that the scheme is a discretionary one which the Council may amend from time to time at its absolute discretion.
- 5.5 Although the final version of the new DCR may allow CAY to continue to be awarded in certain time limited cases after the new DCR become law such an award could well constitute unlawful age discrimination, given entitlement to CAY is linked to age and length of service. As a result of recent amendments made to the Employment Equality (Age) Regulations which delay the pension provisions of the Regulations coming into force until 1st December 2006 it may be the case that an award of CAY made prior to that date would not be unlawful. However the position is not clear and in those circumstances it would be prudent for the Council to proceed on the basis that an award of CAY is caught by the Age Regulations from 1st October 2006. It is unlikely that the eligibility criteria for CAY can be objectively justified. In deciding whether to authorise an award of CAY and if an award of CAY is made the

amount to be awarded the Director of Finance and Corporate Resources would need to consider the risk of an age discrimination claim being successfully brought if the award was made.

6.0 Diversity Implications

6.1 The proposals in this report are compliant with the legal requirements under the new age legislation. The application of the proposals in this report will need to be monitored to ensure that they do not impact any particular group in a disproportionate way.

7.0 Staffing/Accommodation Implications (if appropriate)

7.1 There has not been time to consult with the trade unions on these recommendations as the Council needed to respond to the legislation in October. However the proposals agreed by the committee will be brought before the trade unions for full consultation immediately after this committee's decision.

8.0 Background Papers

1. LGE advisory bulletin 515
2. The Local Government (Early Termination of Employment)(Discretionary Compensation)(England and Wales)Regulations 2000
3. The draft Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006.

9.0 Contact Officers

Andy Gray: Pensions Manager
Chesterfield House, 9 Park Lane, Wembley, Middlesex, HA9 7RW
Tel: 020 8937 3157

DUNCAN McLEOD
Director of Finance and Corporate Resources

VAL JONES
Director of Human Resources and Diversity

