General Dental Council

Costed Corporate Plan 2022 – 2024



Published April 2022

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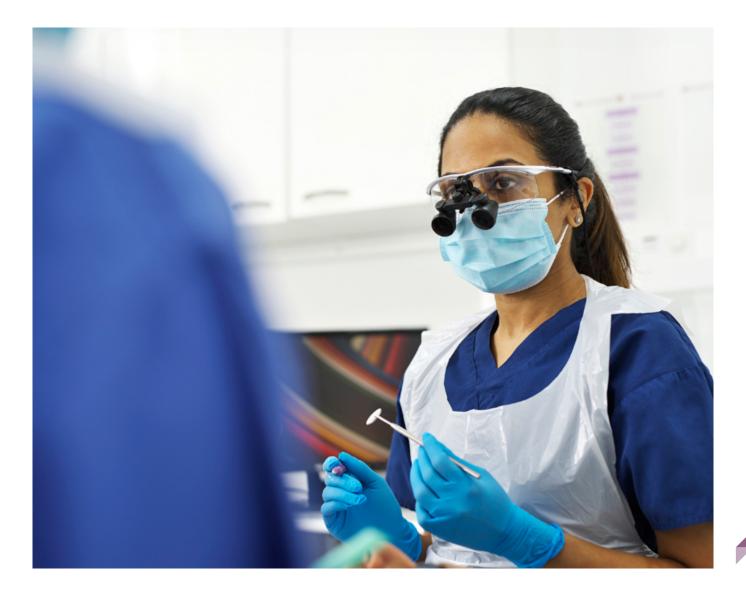
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1. Foreword from Chief Executive and Registrar

As the UK-wide statutory regulator of around 114,000 members of the dental team, our primary purpose is to protect patient safety and ensure that the public have confidence in the services provided by dental professionals.

Our Costed Corporate Plan (CCP) sets out what we will do, the fees that we charge, and includes our forecast of income and expenditure for 2022, as well as reporting on our progress in 2021.

The pandemic has continued to impact the work that can be delivered and is still having a significant impact on the dental sector and wider economic landscape. We continued to deliver our statutory purpose throughout the pandemic, reprioritising work to ensure that we operated efficiently and effectively. We changed how we work too, with most staff working remotely from home for much of the year, although staff from our core operational functions continued to work from our Birmingham office throughout 2021. We heard most of our Fitness to Practise hearings remotely, improving our use of video technology and adapting how we work.

In 2021 we have been able to start some of the work that was delayed in 2020 due to the pandemic and were able to start work early on some activities that were not planned to start until 2022. Furthermore, we have completed significant pieces of work that were not planned at the start of the year.

We were able to restart Part 2 sittings of the Overseas Registration Exam (ORE) in January 2022, which had been suspended since early 2020. While the regulatory reform scope and timetable remained uncertain, we reviewed the CCP to ensure that we were able to incorporate any necessary preparatory work into the workplan, if the Department for Health and Social Care's (DHSC) plans for legislative reform for the GDC were to start in 2022.

It proved necessary to increase our budget for 2022 by 5.8%, compared to 2021. This was due in part to the costs associated with increasing the capacity of our Fitness to Practise and Registration teams to improve our performance in these vital statutory functions.

Our current corporate strategy covers the three year period ending in 2022. We are developing a new corporate strategy for the period from 2023 to 2025 which will be published in January 2023, following a public consultation. The planned activity for 2023 and 2024 set out in this document will be reviewed against our updated strategic aims as we develop the Costed Corporate Plan for 2023.

While we develop our next corporate strategy, we will continue to make progress on our plans for 2022 and to deliver our regulatory remit to ensure patient safety and public confidence in dental services.

Ian Brack

Chief Executive and Registrar

2. Corporate Strategy 2020 – 2022

Right time, Right place, Right touch update

As the UK-wide statutory regulator we play a crucial role in ensuring that the public are protected and that they have confidence in the services provided by dental professionals.

Recent years have seen a shift in the way we regulate the professions, as we have sought to move away from a focus on enforcement, emphasising instead prevention and right-touch regulation, whilst at the same time ensuring that our approach to regulation always has patient safety and public confidence at the heart of everything we do.

We previously set out our vision when we launched our corporate strategy in November 2019, which is a system that:

- supports the provision of safe, effective oral health care
- promotes and embeds clear standards of clinical competence and ethical conduct
- embodies the principles of right touch regulation: proportionality, accountability, consistency, transparency, targeted, and agility.

This strategy is now in its final year in 2022.

We have continued to respond to the new demands created by the COVID-19 pandemic, which continues to have a significant impact on dental education, on access to dental services, particularly NHS services, and on the confidence and expectations of dental patients and the wider public.

Integral to the achievement of our current strategy are our five strategic aims.

Our experience during the pandemic led us to simplify the wording in 2020, but not change the intent of the strategic aims we initially published.

We did this to make the intention of our work clearer to our stakeholders and to support our ability to reprioritise our work during the period of additional uncertainty that the pandemic brings. All our activity is aligned with one or more of these aims:

Strategic aim	Description
1	Career-long upstream regulation that upholds standards for safe dental professional practice and conduct.
2	Resolution of patient concerns at the right time, in the right place.
3	Right-touch regulatory decision-making for our enforcement action.
4	Maintaining and developing our model of regulation in preparation for reform of our legislation.
5	An outcome-focused, high performing and sustainable organisation.

Achieving these aims requires us to continue to transform our working practices by further embedding these approaches into our work:

- **Working collaboratively** developing and maintaining effective partnerships with relevant organisations and the professions.
- **Being evidence-led** using research to support and inform proportionate decision making and to focus our activity and resources.
- Making the best use of resources constantly challenging ourselves and our operating practices to ensure value for money.
- **Being inclusive** seeing the value and importance of diversity and acting to ensure that this is reflected in our work.

And these are all approaches that will continue to be relevant, not just for this year, but for future years when we publish our new strategy.

In considering the changing strategic context, we identified five shifts in emphasis to take into account as we undertake the work to deliver the Costed Corporate Plan.

- 1. Ensuring members of the public are receiving the information they need to be confident in dental care.
- 2. Playing our part to identify and address the exacerbated effects of inequality on members of the public seeking dental care and dental professionals.
- 3. Highlighting the new pressures on the dental economy and workforce that may affect patient care and ensuring our routes to registration facilitate access to the workforce where it does not compromise public protection.
- 4. Focus our attention on the changes to dental practice affecting patient safety that have been accelerated or brought about by the pandemic.
- 5. Provide clarity on our leadership role and support cohesive sectoral leadership.

These shifts do not create new work items in our plan, but instead change how we approach that work and some of the things that we will achieve when the work completes.

Developing our new corporate strategy for 2023 – 2025

In June 2021 we commenced work to develop a refreshed set of strategic aims and objectives which will enable us to continue to work towards our long-term vision set out in 'Right time, Right place, Right touch', while also delivering and improving our statutory functions.

Our core strategic ambition since the publication of 'Shifting the Balance' in 2017 is to focus more on prevention and upstream activities, reducing the risk of harm occurring and, over time, reduce the need to deal with the consequences of harm having occurred. However, we know that there is still much to be done to achieve this ambition and it will therefore remain at the core of our corporate strategies for some time to come. We have been reviewing progress on the achievement of our strategic aims set out in 'Right time, Right place, Right touch' and are considering the context of the wider external environment in which we will be working in in 2023 – 2025.

Our next corporate strategy 2023 – 2025 will be published in January 2023, following a public consultation.



3. Review of the 2021 Plan

The Costed Corporate Plan (CCP) for 2021 was designed to be flexible and to facilitate changes to the detail and profile of the plan throughout the year as priorities changed. This meant that although the pandemic continued to affect the work that could be delivered - and is still influencing the dental and wider economic landscape - we were able to better manage our workplan and deliverables in 2021. As a result, we were able to commence and continue work in areas that were not possible in 2020.

2021 CCP project summary

Status	Strategic aim 1	Strategic aim 2	Strategic aim 3	Strategic aim 4	Strategic aim 5	Total
On track or completed	15	1	12	3	40	71
End date moved	6	0	1	0	4	11
On hold	0	0	0	0	1	1
Stopped	1	0	0	0	5	6
TOTAL	22	1	13	3	49	89

At the beginning of the year there were 79 projects on our workplan for 2021, plus an additional 10 projects that were carried over from the previous year (2020: 78 projects in total).

Of these 89 projects:

- 27 projects were completed.
- 44 projects are in progress and remain on track for delivery in 2022 or 2023.
- 11 projects had end dates moved, due to changes in scope and schedule.
- One project was put on hold.
- Six projects were stopped for a number of reasons including changes to the landscape that meant the
 work was no longer required at this time, the planned work was superseded by deliverables from other
 projects, or changes to operational practices.

In addition, we were able to start work early on some activities that were not planned to start until 2022.

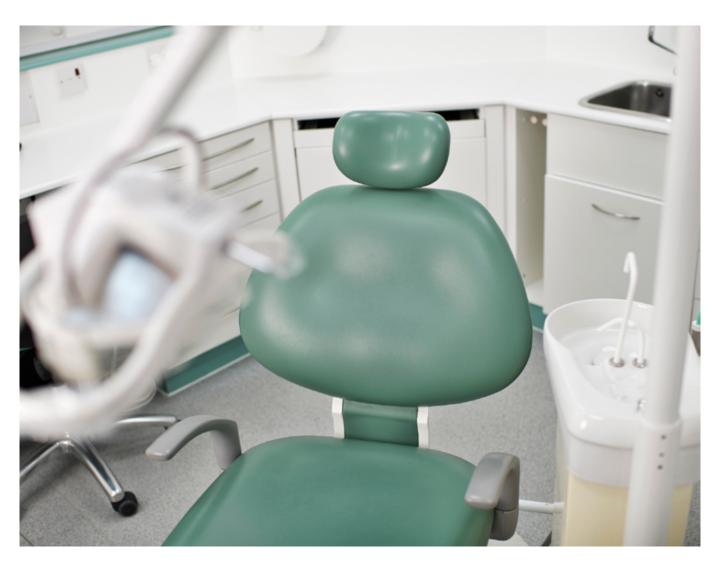
Responding to, and living with the pandemic

Throughout the pandemic the GDC has continued to deliver its statutory purpose, reprioritising our work to respond to the effects that COVID-19 was having on the workplan.

Although some core staff continued to work from our Birmingham office throughout the whole of 2021, most staff worked remotely from home for much of the year, returning to the office in the autumn, then going back to remote working again towards the end of 2021 when the impact of the Omicron variant resulted in a change in Government guidance.

In 2020 it was necessary to halt or defer some work as a result of the wider impacts of the pandemic, for example projects that required external engagement which we were unable to undertake. In addition, several internal projects were delayed as we refocused our resources to ensure our people were able to work remotely to deliver our regulatory remit.

In 2021 we were able to commence some of this work as we were able to engage more effectively with our stakeholders and the public throughout the year. Projects recommenced in 2021 included; introducing a new digital recording system; developing tools to support patient-centred care; and progressing the administrative separation of our Hearings function. It was not feasible to continue this work during the initial pandemic conditions as appropriate consultation and stakeholder engagement could not be undertaken, but we were able to undertake this activity in 2021 as the restrictions eased.



Unplanned and additional work undertaken in 2021

Whilst the level of unplanned work in 2021 was much less than that in 2020, there were still a number of areas where we were required to complete significant areas of work, that were not planned for at the start of the year.

For example, the Overseas Registration Exam (ORE) was suspended in early 2020, and significant additional work was required to communicate with those affected by the ongoing uncertainty over when the exam would resume. As soon as the COVID-19 restrictions affecting the exam were removed, work was required to plan the resumption of the ORE part 2. The ORE successfully resumed in January 2022, with 131 participants sitting the part 2 exam.

At various points in the year the pandemic was also the cause of some unplanned activities, such as responding to a consultation and preparing guidance for the introduction of COVID-19 vaccination as a condition of deployment in England.

The UK's exit from the EU continued to change the priority and scope of our work. The UK government started to prepare new legislation to authorise regulators to enter into mutual recognition agreements to replace the prior European system of qualification recognition. This work had interactions with planned changes to our international registration legislation we had already been working on with the DHSC.

Regulatory reform continues to draw upon our resources, but its scope and timetable remain uncertain. At present, following the consultation that was published in March 2021, we are awaiting publication of the response and the outcomes of the reviews planned for the number of regulators and regulated professions.

Whilst there is still uncertainty over the DHSC's plans for legislative reform for the GDC, the department commenced work in 2021 to prepare the GMC reform proposals, which will include the common elements of the legal framework for all regulators. We have been sighted on the draft proposals and provided feedback to the DHSC. We have also made preparations, taking into account the uncertainty over the scope and timetable for reform, if the process to reform the regulators is moved forward.

The CCP was reviewed to consider which projects could be impacted in 2022. Our main aim in this work is to take a proportionate approach to maintaining readiness as we await certainty over the timetable and scope of reform. This work will continue throughout 2022 and will evolve as more information is shared by the DHSC.



Achievements, progress and key projects completed in 2021

In addition to responding to the pandemic and undertaking the additional work that was initially not planned for, the key activities delivered or progressed in 2021 included:

Progress and key projects completed in 2021

Launched payment by instalments option

We launched a payment by instalment option to DCPs in May and dentists in quarter four, allowing them to spread the cost of their retention fee across the year. This option has been taken up by 10% of DCPs and 16% of dentists.

Improved our EDI data capture

We asked all dental professionals to update their EDI information, as part of their annual renewal in June and December and now have updated data for over 104,000 dental professionals, which is 92% of the register. This data will now be used to help inform our EDI strategy and development work going forward.

Developed shared understanding of professionalism

Our Promoting Professionalism programme continued in 2021, with a focus of prevention rather than enforcement. We continued to work with dental professionals and the public to come to a shared understanding of what professionalism means in dentistry.

Achievements in 2021 included designing the draft set of new principles that we will be consulting on in 2022, completing research to understand what professionalism means to patients and dental professionals, completing stakeholder engagement to discuss what professionalism in dentistry looks like, and using this to help shape our work.

Supported the dental team with online resources

In April 2021, we published <u>Supporting the dental team</u>, an online resource for employers, managers, and contractors of dental services. The guide, which was developed with the help of our stakeholders, pulls together useful information from a range of places to support employers and managers of dental professionals, who may not be GDC registrants, to play a significant role in ensuring patients receive high standards of service and care.

Recommenced developing a comprehensive complaints resolution model

Work on developing a comprehensive complaints resolution model recommenced in quarter three of 2021. This project will continue to work with our partners to develop a comprehensive model for the definition and resolution of complaints and concerns about dentistry, across each of the four nations.

Progressed our review of Scope of Practice

We initially consulted key stakeholders on the overall approach for updating the guidance, then held a series of virtual workshops over the summer with stakeholder organisations and dental professionals, across all titles, to develop the structure and content of a revised set of guidance. We aim to consult on this guidance later in 2022.

Progress and key projects completed in 2021

Continued to deliver hearings safely and efficiently

With isolation measures continuing in 2021, we continued to hear most of our Fitness to Practise hearings remotely. We also gained more experience and learning from running hybrid hearings. Over the course of the year, we refined our use of video technology and introduced over 50 new panellists to sit on Fitness to Practise hearings. We ran one hearing totalling 33 days, that ended in early 2022, which was held entirely using video technology.

Throughout 2021 we held 682 online hearings (including initial hearings, Practice Committees, Interim Order Committees, and their respective reviews), compared to 11 that were held as hybrid, and one that was held entirely in-person.

Commenced work on the administrative separation of our hearings function

Work completed in 2021 included confirmation of the new name for this service: the Dental Professionals Hearings Service, stakeholder workshops and public research.

Initial development work to establish the new distinct identity was completed, and this development work will continue in 2022. We anticipate launching the Dental Professionals Hearings Service in Quarter 2.

Introduced a new telephone system

Our ability to deal with telephone inquiries from members of the public and dental professionals when staff were required to work mostly from home was impacted by our previous reliance on an internal, desk-based phone system. We implemented a new telephone system, linked to our internal IT systems, introducing 'soft phones' that better supported our employees working from home and the office, enabling them to provide effective telephone help and support to dental professionals, patients and the public.

Implemented additional back-office systems to improve organisational efficiency

We were able to implement a number of new back-office systems that improved our operational effectiveness and efficiency. These changes included replacing our credit card processing systems; improving and upgrading our IT infrastructure; and introducing new technologies that now allow us to hold hybrid multisite Council meetings.

We also introduced a new People Software System that replaced the five discrete software systems previously used to manage and support our HR services.



4. Work programme for 2022 – 2024

Detailed below is our work programme for 2022 – 2024. As with last year we have allocated individual activities to a single strategic aim, although we recognise that some projects will contribute to multiple strategic aims.

A target year by which each project is scheduled to be completed is provided for all the initiatives. These timings are indicative as they are based on the information available during the planning period (Q4 2021) and are subject to a changing external environment and organisational priorities.

There are 72 projects in the 2022 – 2024 work programme, with 62 projects on the workplan for 2022: 43 'flow through' projects that started in previous years, and 19 new projects that will start in 2022.

Of the 72 projects on the work programme, 43 are due to complete in 2022, 18 in 2023 and 11 in 2024.

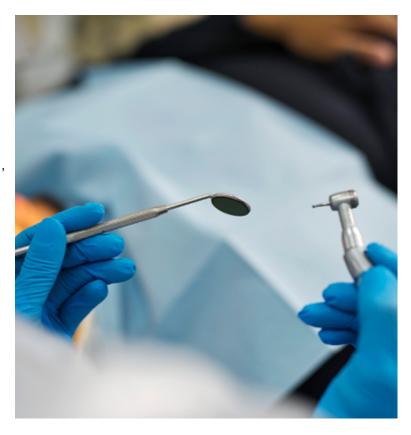
As with 2021, much of our project work will again continue to focus around delivering strategic aim five. This aim is focused on the organisation and how we perform ensuring we have the right systems, processes, and technology in place. Improved effectiveness and efficiency should free capacity and enable us to shift more of our resource towards upstream regulatory efforts which anticipate and address potential public protection issues before they become problems.

It should be noted that the CCP only details the project work we plan to complete and does not include all our normal business as usual (BAU) activity that we undertake to ensure that we are able to deliver against our regulatory remit of ensuring public safety and public confidence in dental services. The cost of this BAU activity is included in the financial information, detailed in section 5.

This business as usual activity includes our Registration and Customer Service teams, Fitness to Practise functions, Strategy, and the wider support functions. It also includes significant work within strategic aim 2 to ensure the effective resolution of patient concerns at the right time, in the right place, with ongoing activities such as chairing the 'Profession wide complaints handling initiative', and the stakeholder activity across the four nations where our engagement has increased significantly. This has included rolling low level concerns across all four nations, meaning these concerns are now addressed through local resolution rather than by the GDC.

The costs for these BAU activities have been allocated to the relevant strategic aim, along with the project costs to provide a total cost breakdown, by strategic aim, for all the planned work and activities over the next three years.

Details of the forecast expenditure by strategic aim can be found in section 5.





Details of individual projects on the 2022 – 2024 workplan, by strategic aim and year of completion

Strategic aim 1

Career-long upstream regulation that upholds standards for safe dental professional practice and conduct

#	Strategic aim 1 projects due to complete in 2022
1.1	Develop an outcome-focused model for lifelong learning – Phase 1
1.2	Implement a framework to promote professionalism – Phase 1
1.3	Implement a process for mediated entry to specialty lists
1.4	Improve the tone of voice of our communications – Phase 3
1.5	Review learning outcomes and expectations for safe beginners – Phase 1
1.6	Review scope of practice for all titles
1.7	Revise and approve specialty curricula
1.8	Scope of practice review – Phase 2
1.9	State of the nation

#	Strategic aim 1 projects due to complete in 2023
1.10	State of the nation – Advancing public safety and confidence in UK dentistry – Phase 2
1.11	Consult on learning outcomes and expectations for safe beginners – Phase 2
1.12	Develop an outcome-focused model for lifelong learning - Phase 2
1.13	Implement a framework to promote professionalism - Phase 2
1.14	Implement further digital improvements – Phase 1
1.15	Revise the standards for education

#	Strategic aim 1 projects due to complete in 2024
1.16	Review the process for quality assurance of specialty training
1.17	Implement a revised process for entry and exit to specialty lists

Strategic aim 2

Resolution of patient concerns at the right time, in the right place

#	Strategic aim 2 projects due to complete in 2022
2.1	Develop a comprehensive complaints resolution model
#	Strategic aim 2 projects due to complete in 2023
2.2	Develop our understanding of the impact of differing indemnity models on regulation

Strategic aim 3

Right-touch regulatory decision-making for our enforcement action

#	Strategic aim 3 projects due to complete in 2022
3.1	Develop monitoring and evaluation of upstream activity
3.2	Develop monitoring and evaluation of fitness to practise
3.3	Case improvements
3.4	Establishing the GDC's role in promoting human factors
3.5	Operational improvements to the adjudications function
3.6	Review of criminal enforcement strategy

#	Strategic aim 3 projects due to complete in 2023
3.7	Case management improvements project
3.8	Fitness to Practise KPIs redesign
3.9	Developing potential in Fitness to Practise casework teams
3.10	Redeveloping case plans
3.11	Review approach to regulatory intervention

#	Strategic aim 3 projects due to complete in 2024
3.12	Case management improvements project
3.13	Consider software improvements for hearings
3.14	Identify software options of empanelment process

Strategic aim 4

Maintaining and developing our model of regulation in preparation for reform of our legislation

#	Strategic aim 4 projects due to complete in 2022
4.1	Further develop and maintain our understanding of change in the dental sector, including its workforce
#	Strategic aim 4 projects due to complete in 2023
4.2	Review boundaries of regulation
#	Strategic aim 4 projects due to complete in 2024
4.3	Reforming international registration

Strategic aim 5

An outcome-focused, high performing and sustainable organisation

#	Strategic aim 5 projects due to complete in 2022
5.1	Develop 2023 – 2025 corporate strategy
5.2	ARF & Applications fees review for strategy cycle
5.3	Develop and implement GDC wide data strategy
5.4	AllPay contract review/renewal
5.5	Culture of operating effectively in a digital age
5.6	Organisational operating model design
5.7	Development of data warehouse and self-serve reporting – Phase 1
5.8	Effective associates
5.9	Hybrid multisite council meetings
5.10	Implement board effectiveness recommendations
5.11	Implement new procurement and contract management process
5.12	Introduce new telephone system, phase 2
5.13	IT systems analysis
5.14	Legal apprenticeships
5.15	Records management – information audit
5.16	Internal engagement strategy & action plan development
5.17	People systems phase 2 – LMS implementation
5.18	People systems
5.19	Policies & working practice changes due to COVID
5.20	Replace credit card processing systems
5.21	Planning for insurance buy out DB pension
5.22	Resourcing strategy

#	Strategic aim 5 projects due to complete in 2022
5.23	SCRIBE replacement
5.24	SharePoint upgrade
5.25	Workforce planning

#	Strategic aim 5 projects due to complete in 2023
5.26	UK registration paperless
5.27	Management capability
5.28	Improving communications and support
5.29	Rewarding contribution
5.30	Update financial processing and management systems
5.31	Associate council member project

#	Strategic aim projects due to complete in 2024
5.32	Non-UK registration paperless
5.33	Enabling continuous registration processes by paperless means
5.34	Advice on and implementation of unitary boards
5.35	Council & committee effectiveness review 2022 implementation of recommendations
5.36	Talent management programmes

Projects added and deleted from the 2022 workplan - March 2022

Three additional projects were added to the original 2022 workplan following a review of our 'on hold' activity in Quarter 1 2022.

The projects added to the plan following this review are included in the projects detailed above and are Review of criminal enforcement strategy (3.6), Consider software improvements for hearings (3.12), Identify software options of empanelment process (3.13).

One project was removed from the plan which was the Paperless Expenses project.



5. Forecast expenditure and income

Forecast expenditure by strategic aim 2022 compared to 2021

The total forecast expenditure for 2022 is £40.63m, compared with the agreed budget for 2021 of £38.39m, which is an increase of 5.8%. This is due to the increased resource requirement across our Fitness to Practise and Registration directorates in addressing operational activity necessarily deferred as a result of the pandemic, and increasing our operational effectiveness. Additional funding was also required to meet the increased cost of additional social distancing restrictions required to enable us to recommence the Overseas Registration Exam (ORE) for a January 2022 sitting.

The total 2021 forecast is £34.88m, which is an underspend of £3.5m. The key driver of this underspend has been the impact of the pandemic. For example, we were unable to run the ORE throughout 2021, and we have seen an increase in deferred operational activity, mainly in fitness to practise. We expect it will take us until Quarter 4 to catch up on this pipeline of deferred activity. In addition, unplanned staff vacancies and increased recruitment lead times throughout the year, meant we did not fully utilise the planned staff cost budget – and further impacted on the GDC's ability to deliver planned work. In December 2021 and January 2022, assessment centres were successfully introduced to address the recruitment issues we had been experiencing.

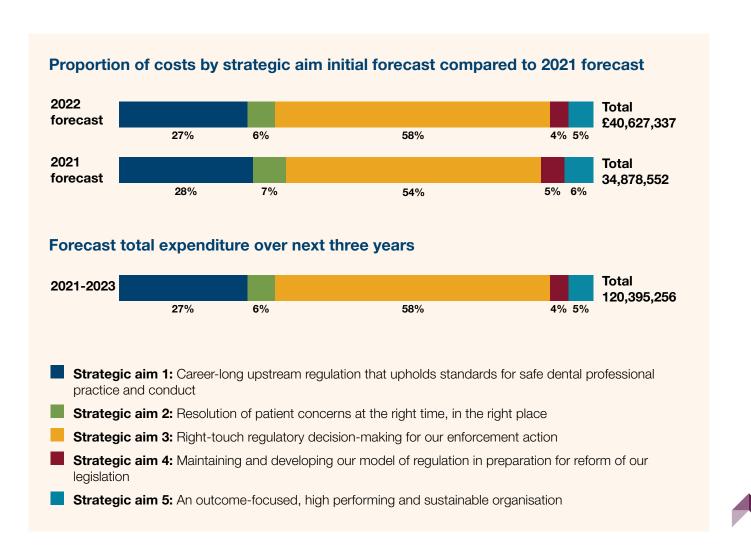
The breakdown of forecast spend by strategic aim includes both the CCP project activity detailed previously, in addition to the normal business as usual work and operational activities that are completed across the GDC throughout the year.

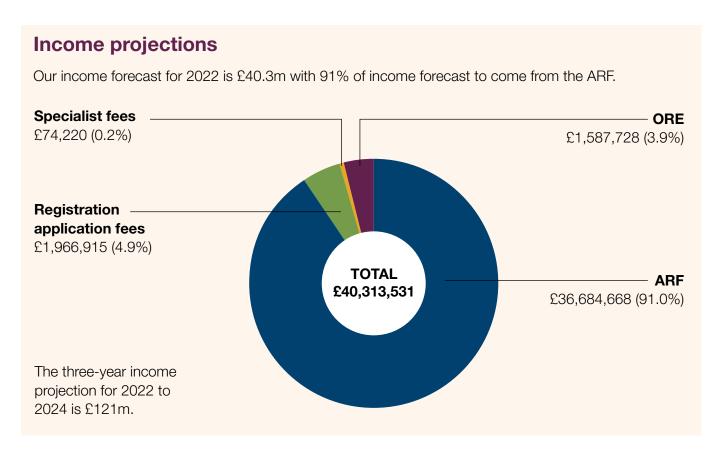
#	Strategic aim	Initial 2022 forecast (£)	% of total	2021 forecast (£)	% of total
1	Career-long upstream regulation that upholds standards for safe dental professional practice and conduct	10,729,027	27%	9,677,187	28%
2	Resolution of patient concerns at the right time, in the right place	2,418,949	6%	2,362,480	7%
3	Right-touch regulatory decision- making for our enforcement action	23,598,006	58%	18,980,206	54%
4	Maintaining and developing our model of regulation in preparation for reform of our legislation	1,743,005	4%	1,784,075	5%
5	An outcome-focused, high performing and sustainable organisation	2,138,350	5%	2,074,604	6%
TOTAL		40,627,337	100%	34,878,552	100%

Forecast expenditure by strategic aim over next 3 years (2022 – 2024)

The three-year expenditure forecast, by strategic aim, for 2022 to 2024 is £120.40m.

#	CCP 2022 – 2024	Total cost (£)	% of total
	Strategic aim costs mapping		
1	Career-long upstream regulation that upholds standards for safe dental professional practice and conduct	32,133,033	27%
2	Resolution of patient concerns at the right time, in the right place	7,249,648	6%
3	Right-touch regulatory decision-making for our enforcement action	70,088,361	58%
4	Maintaining and developing our model of regulation in preparation for reform of our legislation	5,101,594	4%
5	An outcome-focused, high performing and sustainable organisation	5,822,620	5%
TOTAL		120,395,256	100%







Income projections

Our income forecast for 2022 is £40.3m with 91% of income forecast to come from the ARF.

Annual Retention Fee (ARF)

The ARF level has been set to align to our forecast of activity, expenditure and reserves. We have worked to ensure that we have removed cross subsidy, where possible, so that the cost of regulation is borne by those most closely associated with that activity.

Our fee-setting policy established three key principles:

- 1. Fee levels should be primarily determined by the cost of regulating each registrant group.
- 2. The method of calculating fee levels should be clear.
- 3. Supporting certainty for registrants and the workability of the regulatory framework.

In 2019 Council set the ARF levels for the next three years, subject to any unforeseen circumstances:

- Dentists £680
- Dental care professionals £114

The ARF level paid by dentists and DCPs and the first registration application fees will be reviewed again in October 2022.

First registration application fees

This is made up of two parts, a processing fee currently set at £22.95, with an additional variable rate dependent on the complexity of the application assessment.

Specialist fees

We apply a fee for initial applications for entry to specialist lists, which is £345 (per specialty). There is then an annual specialty retention fee of £72 (per specialty).

Overseas Registration Exam (ORE)

The ORE is an exam that overseas qualified dentists have to pass in order to register with the GDC. It is made up of 2 parts, a written exam and a clinical exam.

Reserves policy

Our reserves policy has been designed to ensure that we retain our financial viability to maintain our statutory purpose and functions. It recognises our financial risk exposure and ensures that we have adequate levels of working capital throughout the year.



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