

CABINET

Monday, 6 November 2017

<u>Present:</u>	Councillor	P Davies (Chair)	Leader of the Council Growth
	Councillors	P Brightmore A Davies G Davies C Jones B Mooney M Patrick C Spriggs J Williamson S Whittingham	Environment Transformation Housing and Community Safety Social Care and Health Children and Families Localism and Engagement Delivering Differently Finance and Income Generation Highways and Transport

43 LEADER'S ANNOUNCEMENTS

Councillor Phil Davies opened the meeting and thanked everybody involved in the River of Light display the previous evening from both the Council and other organisations. The feedback he had been receiving was very positive.

Councillor Chris Spriggs added her thanks to everyone involved, and expressed her delight that the streets of New Brighton had been filled with local people and local volunteers for the street entertainers and fireworks display.

Councillor Phill Brightmore thanked all those involved in a number of community displays which had been provided across parks in the Borough and in particular he thanked Mary Worrall, Senior Manager, Parks and Countryside, and all her staff. He also expressed his thanks to the staff of Biffa for their quick response in clearing up after the River of Light event.

Councillor Phil Davies also thanked all those involved with the community fireworks displays including the Merseyside Fire and Rescue Service for all their work on both nights.

Councillor Phil Davies then invited Councillor Phill Brightmore to address the Cabinet on a number of awards which officers of the Council had been involved in in the last couple of months.

Councillor Phill Brightmore informed the Cabinet of the following:

1. Last week, The Chartered Institute of Environmental Health (CIEH) presented its Best Project Award to Wirral's 'Reducing the Strength and Custodians' scheme. The initiative was a partnership between Wirral Council's

Environmental Health, Trading Standards and Public Health teams, working with the Wirral Ways To Recovery service and the award was recognition of its collaborative approach as well as its success in achieving a number of challenging targets.

'Reducing the Strength' was now embedded in Birkenhead, Tranmere, Rock Ferry and New Ferry working with local off licences encouraging them to stop the sale of super-strength, low-cost beers and ciders. The scheme was now expanding into Seacombe and other areas.

As an extension to the project, the team also developed the 'Custodians' scheme which trained staff in off-licences in how to refer problem drinker customers to the drug and alcohol service, Wirral Ways to Recovery. This was also proving successful and had been well received by businesses.

He expressed thanks to all the departments involved, and in particular Colin, Gareth, Jon, Heidi and Christine. In addition to the local Councillors, who he knew gave the scheme their full support. This was a fantastic example of departments coming together to better the lives of those living in the most challenging circumstances.

2. The World Urban Parks European Congress came to the Wirral in October to celebrate the 170th Anniversary of the opening of Birkenhead Park, which was the world's first municipally funded public park.

Delegates at congress, including international parks professionals, local Friends of Parks groups and representatives of national organisations shared information about the pressures facing public parks and the importance of urban public parks for health, social inclusion, the economy (including tourism) and the environment.

Birkenhead Park was awarded a Gold Standard Large Parks Award from the World Urban Parks organisation. Further, Dr Mary Worrall, Senior Manager in Wirral Council's Parks, Coast and Countryside team, was also bestowed with the honour of becoming a Certified Park Professional International (CPPI), the highest award given by the World Parks Academy. Both awards were richly deserved and he was sure Cabinet would join in congratulating Mary, Paul and their team, in Birkenhead Park and elsewhere across the Borough.

The congress also strongly endorsed the Council's bid for the inclusion of Birkenhead Park on the UK's list of tentative world heritage sites, in recognition of its historic outstanding universal value.

3. In September, the RSPCA also announced their intention to give Wirral Council and its partner, the Friends of Birkenhead Kennels, the Gold stray dog footprint award and Wirral Council a Silver Award for its Animal Licensing. This was

remarkable, and he gave a special mention to Sam Simpson who worked as a full time volunteer managing the Kennels, she was also a Trustee for FOBK.

He also thanked Hazel Millington who supported FOBK as well as carrying a very diverse range of duties including that of a Statutory Dog Warden, Animal Welfare and Licensing Officer, Technical Officer and an all-round expert advisor to the Council in all things animal!

During early 2017 the Environmental Health service won the Echo Environment Award for best project, this award was for its EatWell Wirral Healthy Eating Award and Takeaway for a Change Healthy eating in school project. The Department for Business, Energy & Industrial Strategy also awarded the service a Special Merit for supporting businesses to export.

Wirral was so lucky to have such a strong and dedicated team, he had been pushing the service and the officers very hard in the last few years to deliver change, improve efficiency whilst adapting and evolving to the changing and challenging environment the Council operated in. He commented how extremely proud he was of everyone in the team.

Councillor Brightmore acknowledged that a good number of these schemes had begun under his predecessor in the role, Councillor Bernie Mooney, and before her Councillor Brian Kenny. He was fortunate indeed to be in a position to give this report as these projects received recognition and expressed his thanks to them.

44 **MEMBERS' CODE OF CONDUCT - DECLARATIONS OF INTEREST**

Members of the Cabinet were asked to consider whether they had any disclosable pecuniary and/or any other relevant interest, in connection with any item(s) on the agenda and, if so, to declare them and state the nature of the interest.

Councillor Angela Davies declared a personal and prejudicial interest in agenda item 6 – All Age Disability and Mental Health Services Transformation Programme (minute 49 refers) by virtue of her employment. She indicated that she would be leaving the room whilst this item of business was under consideration.

Councillor Chris Jones declared a personal interest in agenda item 6 – All Age Disability and Mental Health Services Transformation Programme (minute 49 refers) by virtue of her employment but she was not directly involved in the services referred to in the report.

45 **MINUTES**

RESOLVED: That the Minutes of the meeting of the Cabinet held on 2 October 2017 be confirmed as a correct record.

EXECUTIVE KEY DECISIONS TAKEN UNDER DELEGATED POWERS

Resolved – That the following Key Decisions that had been taken under delegated powers during the period 21 September, 2017 to date, be noted:

- **Cabinet Member for Adult Social Care and Health
Outcome Based Model of Commissioning for Supported Living Services.**
- **Cabinet Member for Adult Social Care and Health
Re-Commission of the Early Intervention and Prevention Contract.**
- **Cabinet Member for Housing and Community Services
Statutory Register of Brownfield Land.**

CORPORATE RISK MANAGEMENT POLICY



Councillor Phil Davies, Leader of Wirral Council said:

“Effective risk management is a key element of good corporate governance. As with other areas of governance the Council’s approach to managing risk has improved greatly in recent years.

But it is important that our approach supports how the Council is seeking to deliver the outcomes in the Wirral Plan and reflects developments in good practice.”

Councillor Phil Davies introduced a report which confirmed the process behind the annual update to the Council’s Corporate Risk Management Policy and appended a draft revised version of the document. The policy was approved by Audit & Risk Management Committee on 25 September (minute 33 refers). In accordance with Cabinet’s ultimate responsibility for corporate governance, Members were invited to consider and formally adopt the Policy on behalf of the Council.

The adoption of a revised Risk Management Policy was a key element of the Council’s approach to managing risk. In line with the governance arrangements for risk management, Cabinet was responsible for formally adopting any updated version of the Policy.

Councillor Davies referred to a key value for the Council to be ‘risk aware, not risk averse’, which made the need for an effective approach to handling risk even more important. The Policy would be disseminated through visits to individual management teams, through presentations to Wirral Plan Pledge Strategy

Groups, publication on the Council Intranet and through completion by managers and staff of the Council's risk management e-Learning courses.

RESOLVED: That the revised Corporate Risk Management Policy be formally adopted.

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RESIDENT PARKING SCRUTINY REVIEW



Councillor Stuart Whittingham, Cabinet Member – Highways and Transport, said:

“It is important we are able to provide an effective, sustainable and well-managed service for residents’ parking schemes. This is an issue which comes up in many communities all across the borough and it is therefore right that Members from all parties have an input in how the service is provided in the future.

I thank the Members who took part in the scrutiny review. The recommendations are helpful, well researched and I am sure will help us develop the quality and availability of this service in the future.”

Councillor Stuart Whittingham introduced the report, which stated that, following a report presented to the Business Overview and Scrutiny Committee in July 2016, a Task and Finish scrutiny review on Resident Parking was added to the Committee’s work programme. The main objective of the review was to understand the issues around the Resident Parking Policy and to help inform the development of a new policy for Wirral.

The scrutiny review was conducted over a number of question and answer evidence sessions and the report set out the findings and recommendations of the Task and Finish Scrutiny Review Panel.

Councillor Whittingham informed the meeting that he supported the majority of the recommendations in the Review but had some new proposals to insert into the recommendations. These new proposals were due to the fact that some of the historic schemes were in areas where households were struggling to make ends meet.

Councillor Phil Davies informed the meeting that the Chair of the Scrutiny Review Panel, Councillor Jean Stapleton, was unfortunately unable to attend to present the review and had sent her apologies. He commented that the amended proposals put forward struck the right balance in maintaining those historic schemes which had been introduced with no charge for residents and which they

shouldn't now have to pay for and a reasonable charge of £10 per annum for new schemes.

On a motion by Councillor Whittingham, seconded by Councillor Phil Davies, it was -

RESOLVED: That -

- (1) Cabinet notes the findings of the report and approves the first three recommendations of the Task and Finish Group;**
- (2) for new schemes and those introduced since 2007 under the most recent policy, the charge for resident permits should continue to be fixed at £10 per year until further notice;**
- (3) for the majority of historic schemes introduced before 2007 where residents do not currently pay a charge for resident permits, existing residents already living in these areas should continue to enjoy these for free with the exception that new residents moving into these areas from 1 April 2018 should pay £10 per year;**
- (4) officers are instructed to commence the necessary legal processes to amend the relevant Traffic Regulation Orders on that basis.**

Councillor Angela Davies left the meeting whilst the next item of business was under discussion.

49

ALL AGE DISABILITY AND MENTAL HEALTH SERVICES TRANSFORMATION PROGRAMME



Councillor Chris Spriggs (Cabinet Member – Delivering Differently), said:

“Making sure residents are able to access the very best, most efficient, services possible is so important, particularly for the most vulnerable people.

For too long, navigating between the NHS, social care and other related services has been incredibly complex, frustrating and challenging for people. People want one phone number to call, one person to speak to, who can give them advice and make sure they get the services they need.

Wirral has made huge progress. We are integrating our services at every level with our colleagues in

the NHS, creating the seamless, efficient and well-designed services which people want, need and expect. This report is another significant step on this process and I am delighted we have been able to make it happen so quickly.

I believe this new, integrated service will help many people all across Wirral get better support and enjoy more tailored services to meet their needs.”

Councillor Christine Spriggs introduced a report, which related to the delivery of social care assessment and support planning functions for people with a disability or mental health need.

Cabinet approval was sought to progress plans for the formation of a single integrated all age health and social care assessment and support planning, service for people with complex disability or mental health needs.

The service was being developed in line with the All Age Disability Strategy and feedback received from people that needed support from services. Cabinet (March 2016) approved the establishment of a Transformation Programme with the development of an All Age Disability and Mental Health service as a key Transformation project.

Key Strategic Outcomes to be delivered through the initiative would contribute to the following Wirral Pledges:

Community Services are joined up and accessible

Services would be commissioned across health and care to get the best outcomes for people within available resources.

People with disabilities live independently

The All Age Disability and All Age Mental Health Service would ensure that people were supported to remain as independent as was possible, to be in more control of their support arrangements and to participate in their local communities.

Wirral Residents live healthier lives

Services would be provided on an all age, whole system basis ensuring that there was a clear link between the 2020 partnership pledges and the Healthy Wirral Programme.

Vulnerable children reach their full potential

Children with disabilities would be supported to plan towards greater independence and to achieve their goals.

Councillor Phil Davies welcomed this move to a more integrated service, which from a practical point of view would enable service users to be able to just tell their

story once to a service professional, rather than have to repeat themselves. A lot of detail was to be finalised but this model was to be commended.

Councillor Chris Jones commented that she had visited an integrated hub where this type of joined up service had made such a difference.

RESOLVED: That -

- (1) the Full Business Case (Appendix 1 to the report), be approved;**
- (2) plans to develop an integrated all age disability and mental health service, be approved;**
- (3) the progression towards a formal partnership arrangement with Cheshire and Wirral Partnership NHS Trust (CWP), be approved;**
- (4) staff consultation as required, be approved;**
- (5) the sharing of one off transformation costs with CWP, including the estimated one off transformation costs of £250,000 attributable to the Council for 2017/18, be approved;**
- (6) a report be provided to Cabinet in Spring 2018 with final details of the proposed arrangement as set out in the Section 75 agreement for sign off.**

Councillor Angela Davies returned to the meeting.

50 SOCIAL VALUE POLICY



Councillor Christine Spriggs, Cabinet Member – Delivering Differently, said:

“This council invests more than £200 million a year into improving Wirral. We commission services, improve roads, bring specialist people and organisations in to support residents. This Policy is about maximising the benefits local people feel from these investments.

We want our suppliers to recruit local people, to invest in Wirral, to put their resources, time and expertise back into the local community to make sure our money goes further and our residents get every possible benefit from public resources in Wirral.

This policy puts the mechanism in place to ensure we can do just that. All new contracts at Wirral Council – every contractor, every supplier, every organisation we commission to do work in Wirral – will have to demonstrate how they will not only achieve best value for the work they do, but how they will use the contract to provide wider benefits to our residents.”

Councillor Christine Spriggs introduced a report, the purpose of which was to provide the Council with a Social Value Policy 2017-2020. The Policy was used to make sure Wirral Council was able to maximise the benefits for local people and businesses through all its commissioning, procurement and purchasing activities. It would be used for external organisations and service providers to explain what the Council expected from them when they worked with the Council.

This policy affected all services, all commissioned activity and all procurement the council undertook. It impacted on the delivery of all 20 Pledges, particularly in relation to supporting small businesses.

Councillor Spriggs thanked all those officers involved in the developing of this policy. Alongside the Council’s Social Value Policy was a Social Value Framework, which outlined the policy objectives and gave examples of social value outcomes which might be achieved, suggested delivery mechanisms and ways to measure Social Value.

Councillor Phil Davies welcomed the report which built on good practice using the Public Services (Social Value) Act 2012 legislation and he looked forward to all the benefits it would bring to Wirral.

RESOLVED: That -

- (1) the Social Value Policy and associated guidance and framework, be approved;**
- (2) officers be instructed to use the Social Value Policy in all procurement, commissioning and purchasing activity.**



Councillor Angela Davies, Cabinet Member – Transformation, said:

“The role our leisure, library, parks and cultural services play in our residents’ lives cannot be underestimated. They provide vital opportunities for local people to enjoy leisure time with friends and family, to learn and to keep fit and healthy.

We committed to ensuring leisure and cultural opportunities for all when we created our Wirral Plan and I am clear we will do everything in our power to live up to that pledge.

The sheer scale of the financial challenges we face in the coming years make it impossible to avoid changing how these services are provided. We must make sure they are sustainable, affordable, and able to meet the changing needs of our residents. However, we must not rush these decisions, they are important services and we must do everything possible to ensure we get them right.

I am thankful to the many local people who took the time to get involved in our consultation exercise. Hundreds of residents gave up their time to give us their ideas and suggestions for how we might improve and safeguard the services in the future.

This report provides Cabinet with a summary of the feedback we have received, and a commitment to keep working on the areas which we have been given, as we continue to develop the blueprint for a long-term, sustainable model to deliver the services residents need for the future.”

Councillor Angela Davies presented a report which related to the review of Leisure, Libraries, Cultural and Parks Services and provided an update on progress to date and next steps.

In March 2017 Cabinet requested an options appraisal and Full Business Case be developed, informed by a comprehensive stakeholder engagement exercise. This initial decision was called-in by the Environment Overview and Scrutiny Committee, where the original decision was upheld.

The options being investigated through the business case development included the creation of a Community Interest Company or a Charity to run the services, or redeveloping the services as an in-house operation directly provided by the Council.

Through the work carried out as a part of the engagement process, including feedback from Members of all parties, and the development of the Operating Model it had become apparent that creating one solution – one new company, charity or redesigned in-house service – which would suit the needs of each individual service, might not necessarily deliver the desired results.

They were diverse services; residents needed and expected different things from each of them, and it was vital the Council developed a model which allowed it to fully meet those needs, while keeping the services sustainable and affordable for the long-term. The services currently cost in excess of £17m, employing 950 individual staff.

The report sought approval from Cabinet to explore additional options for each of the individual services in scope, in order to better address the requirements of the review.

Councillor Matthew Patrick expressed his pleasure with the extensive communications and engagement programme which had been carried out and commented upon the need to continue this engagement.

Councillor Phil Davies commented that as a 'one size fits all' approach was not an option, there was a need to take more time to get this review right. With the Council's budget being under huge pressure from Government cuts, discretionary services were under massive pressure. Solutions had to be found to make sure these services could be delivered, there was a need to take on board what residents and stakeholders had said, to continue to talk to Trades Union colleagues and come up with a model which sustained these services.

RESOLVED: That -

- (1) the feedback from residents, staff and other stakeholders be noted, and officers be instructed to make contact with everyone who took part in the consultation to thank them for their involvement.**
- (2) officers provide a report to Cabinet outlining the approach to future service provision in the New Year.**



Councillor Janette Williamson (Cabinet Member for Finance and Income Generation) said:

“It has been reported for some time that the ongoing national austerity policies continue to place huge pressure on local government, particularly in relation to social care services. Recent announcements regarding the demands for care for children highlight that this is both a national, and local, challenge which brings with it significant costs.

The Council continues to plan and manage its budget in a sustainable way. Mindful that there will always be changing requirements and the subsequent demands on the budget the Revenue Budget Contingency was made available. This helps mitigate the enormous demands on our services and why we are able to react to changing circumstances.

We continue to look for opportunities to make best value of the resources available, ensuring they are well managed, used to deliver best value for Wirral residents, and enable us to deliver our 20 Pledges.”

Councillor Janette Williamson introduced a report which set out the projected revenue position for 2017/18 as at the end of Quarter 2 (30 September 2017).

The Quarter 2 forecast was an overspend of £1.2 million for 2017/18 (Quarter 1 reported a forecast overspend of £4.2 million). The improvement was essentially due to the inclusion of unused Revenue Budget Contingency to the forecast. Underlying there was additional investment into Children’s Services and associated legal costs regarding the placement of children which had resulted in budget pressure.

Councillor Williamson commented upon the effects of seven years of austerity on the Council’s finances and the increasing pressures on Children’s Services, which were at crisis point. The Council’s General Fund balances stood at £12m (the absolute minimum level for these, set out by the Council’s S151 Officer, being £10m) and she set out the facts with regard to Council reserves:

- £27m Capital Grants, received in advance to fund specified projects and only to be used to fund these specified projects, otherwise funding had to be returned.
- £4m in Capital Receipts reserve – proceeds from the sale of buildings and land which could only be used to fund current or future capital investment.
- £51m earmarked reserves – only to be used to fund something which would happen in the future and included:
 - £17m to cover potential claims relating to insurance, tax and benefit claims.
 - £16m for specific projects and initiatives including commitments regarding public health contracts, funding for on-going apprentice programmes and similar programmes.
 - £13m relating to Schools Budgets and activities that could only be spent by schools.
 - £4m for the transformation programme to deliver services differently.

She hoped that these figures would set the record straight and put an end to the wilful misrepresentation of the facts.

Councillor Bernie Mooney informed the Cabinet on the situation in Children's Services and that as of last week there were 828 children in the Council's care. The pressures on Children's Services were increasing all around the country with three out of four Council's suffering. So much money had been taken out of the service that funds had had to be moved from early intervention to deal with crisis management. Councillor Mooney had written to both the Prime Minister and Chancellor of the Exchequer about the situation but as yet had had no reply. She had also written to Lord Porter, Chair of the Local Government Association, and received a sympathetic response as he had also called for the Government to meet the £5.8bn funding gap facing local services by 2020 at the recent National Children and Adult Services Conference.

Councillor Phil Davies commented upon the fact that Lord Porter, Conservative Chair of the LGA, was asking for the Government to provide more money to Local Authorities spoke volumes. He hoped that the Government would address the issue in the forthcoming budget. There was a huge determination to make sure that the Council delivered good quality frontline services.

RESOLVED: That:

- (1) the Quarter 2 forecast year-end overspend of £1.2 million, which incorporates a £4.8 million variance relating to Children's Services and related legal costs, and the projected General Fund Balances of £12 million at 31 March 2018, be noted.**
- (2) officers continue to identify actions and take measures to effectively manage the overall budget and reduce the impact of the projected overspends.**

(3) the request for funding of £350,000 from General Fund Balances in respect of the implementation of the General Data Protection Regulation (GDPR) in May 2018 be referred to Council for approval.

53 **CAPITAL MONITORING 2017/18 QUARTER 2**



Councillor Janette Williamson (Cabinet Member for Finance and Income Generation) said:

“This report demonstrates the major investment we are making against our priorities. It shows the sensible and pragmatic steps we are taking to make best use of the resources available to develop our assets to support our services to the public.”

Councillor Janette Williamson introduced a report, which provided an update on the progress in delivering the Capital Programme 2017/18 as at the end of September 2017. It recommended that Cabinet agree an amended 2017/18 Capital Programme of £67.5 million which took into account re-profiling, new bids, revised grants etc. identified since the quarter 1 monitoring report. Expenditure to date was £13.7 million.

Councillor Williamson informed the Cabinet of the five new bids which were in the Capital Programme:

- Cyber security - £1.562m
- Street Lighting - £0.5m
- Eureka Project - £0.308m
- Thermal pool covers - £0.15m
- Collaborative working for Children’s Services - £0.102m

Councillor Stuart Whittingham welcomed the extra investment in street lighting on top of the previously agreed sum of £0.5m from the March Budget. Street lighting continued to be a concern to Members and the public and this extra investment would allow the Council to undertake more replacement of stock.

Councillor Phil Davies welcomed the financial assistance for the Eureka project which would be a fantastic development at Seacombe Ferry if it could be brought

to Wirral, and which could bring 250,000 visitors each year. The Metro Mayor, Steve Rotheram, was also very keen on securing this project for Seacombe. There was a lot of work still to be undertaken on this project.

RESOLVED: That -

- (1) the expenditure at Quarter 2 of £13.7 million, with 50% of the financial year having elapsed, be noted;**
- (2) the inclusion in the programme of the 5 new bids, at an additional capital cost of £2.6 million, be approved and referred to Council;**
- (3) the revised Capital Programme of £67.5 million be agreed and referred to Council.**

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TREASURY MANAGEMENT MONITORING 2017/18 (MID-YEAR REPORT)



Councillor Janette Williamson (Cabinet Member for Finance and Income Generation) said:

“The success of the Council is reliant upon the effective management of all of our resources. The approach to Treasury Management is a key element and our proactive and risk aware approach has delivered significant financial benefits in recent years.

This has continued this year with Treasury Management projected to deliver a cash benefit of £6.1 million during 2017/18 with £4 million of this recurring in future years.

Achieving savings of such significant levels provides huge support to the front-line services residents rely on. We are able to achieve these savings from making business decisions regarding borrowing and investments to take advantage of commercial and funding opportunities alongside the security, liquidity and return on any investments.”

Councillor Janette Williamson introduced a report, which stated that the Authority’s treasury management activity was underpinned by CIPFA’s Code of Practice on Treasury Management (“the Code”), which required the production of annual Prudential Indicators and a Treasury Management Strategy Statement on likely financing and investment activity. The Code also recommended that Members were informed of treasury management activities at least twice a year.

The report fulfilled the Authority's legal obligation under the Local Government Act 2003 to have regard to both the CIPFA Code and the Department for Communities and Local Government (CLG) Investment Guidance.

Proactive Treasury Management activity had resulted in:

- a) Estimated one-off savings in 2017/18 of a minimum of £2 million from reduced interest payments and management of the Authority's Capital Financing. This has been reflected in the Revenue Monitoring (Quarter 2) Report to Cabinet.
- b) A further saving of £4.1 million being generated in 2017/18 as a result of revising the Council's Minimum Revenue Provision (MRP) Policy. This saving would be recurring on an annually reducing basis over a 17-year period. Subject to Council approval of the policy change the impact of this would be reported in the Revenue Monitoring (Quarter 3) report to Cabinet.

Councillor Williamson thanked the Treasury Management Team for a really positive report.

RESOLVED: That -

- (1) the Treasury Management Mid-Year Report for 2017/18 be agreed;**
- (2) the revision to the Council's Minimum Revenue Provision (MRP) Policy in selecting the annuity method within 'Option 3 Asset Life' for calculating the MRP, be endorsed and that this be referred to Council for approval;**
- (3) the estimated saving of £2 million from Treasury Management activities in 2017/18 be noted;**
- (4) the additional saving of £4.1 million from the revision to the Treasury Management Minimum Revenue Provision (MRP) Policy in 2017/18 be noted;**
- (5) the revised Authorised Signatory List relating to Treasury Management activity be approved.**