

**MINUTES OF A MEETING OF THE FULL COUNCIL COMMITTEE HELD IN THE COUNCIL CHAMBER,
NEWBURY TOWN COUNCIL, MARKET PLACE, NEWBURY ON
MONDAY 22nd JUNE 2026 AT 7:30 PM.**

PRESENT

Councillors Phil Barnett, Vera Barnett, Alistair Bounds, Jo Day (Town Mayor, Chair), Billy Drummond, Nigel Foot, David Harman, Ian Jee, David Marsh, Vaughan Miller, Andy Moore, Gary Norman, Elizabeth O’Keeffe, Sarah Slack, Graham Storey, Meg Thomas.

In Attendance

Toby Miles-Mallowan, Chief Executive Officer
Liz Manship, RFO

21. APOLOGIES

Councillors Sam Dibas, Chris Hood, Roger Hunneman, Pam Lusby Taylor, Steve Masters, Martha Vickers and Tony Vickers.

22. DECLARATIONS OF INTEREST

It was declared that Councillors Phil Barnett, Billy Drummond, Nigel Foot and David Marsh who are also Members of West Berkshire Council, which is declared as a general interest on their behalf and a dispensation is in place to allow them to partake in discussions relating to West Berkshire Council business.

23. MINUTES

Proposed: Cllr Foot

Seconded: Cllr Norman

Resolved: to approve the minutes from Wednesday 6th May 2026.

24. QUESTIONS AND PETITIONS FROM MEMBERS OF THE PUBLIC

Question **Received** from member of the public (appendix 1)

25. MEMBERS’S QUESTIONS AND PETITIONS

Question **Received** from Councillor Phil Barnett (appendix 2)

26. MAYORS REPORT

The Mayor’s report was **received**.

27. CHIEF EXECUTIVE REPORT

The Chief Executive Report was **received**.

28. COMMITTEES

The minutes from the meetings of the Town Council’s Committees were **received**.

29. PRESENTATION FROM AGE CONCERN NEWBURY – DEMENTIA CARE

The presentation was **received**

30. PRESENTATION FROM NEWBURY BUSINESS IMPROVEMENT DISTRICT

The presentation was **received**.

31. COMPLAINTS POLICY

The complaints policy was **received**.

Proposed: Cllr Norman

Seconded: Cllr Slack

Resolved to **adopt** the complaints policy as recommended by the Strategy Working Group

32. INTERNAL AUDIT (2025/26 Q4)

32.1 The internal audit for Q4 2025/26 was **received**

Proposed: Cllr Norman

Seconded: Cllr O'Keeffe

Resolved to approve the internal auditor's Q4 recommendations

32.2 internal auditor's 2025/26 recommendations – update on progress

Proposed: Cllr Norman

Seconded: Cllr O'Keeffe

Resolved to approve the update on progress on the internal auditor's 2025/26 recommendations.

32.3 internal auditor's signed audit report (AGAR) year-ending 31/03/2025

Proposed: Cllr Norman

Seconded: Cllr O'Keeffe

Resolved that the internal auditor's signed audit report (AGAR) year-ending 31/03/2025, be forwarded to the External Auditor.

33. ANNUAL GOVERNANCE & ACCOUNTABILITY RETURN (AGAR) ANNUAL GOVERNANCE STATEMENTS 2025/26

The Annual Governance Statements 2025/26 were **considered**.

Proposed: Cllr Norman

Seconded: Cllr Miller

Resolved to approve, sign and forward the Annual Governance Statements to the External Auditor.

34. ANNUAL GOVERNANCE & ACCOUNTABILITY RETURN (AGAR) - ANNUAL ACCOUNTING STATEMENTS 2025/26

34.1 the Accounting Statements for 2025/26 were **considered**, together with the

34.1.1 Year-end Reconciliation

34.1.2 Reconciliation between Box 7 & 8

34.1.3 Explanation of Variances 2024/25 to 2025/26

34.1.3.1 Precept

34.1.3.2 Total Other Receipts

34.1.3.3 Staff Costs

34.1.3.4 All other payments

34.1.3.5 Fixed Assets

Proposed: Cllr Norman

Seconded: Cllr Miller

Resolved that the Annual Accounting Statements are approved, signed and forwarded to the external auditor

35. MAKING PROVISION FOR THE EXERCISE OF PUBLIC RIGHTS

Proposed: Cllr Moore

Seconded: Cllr Thomas

Resolved that the council publish the Notice of Public Rights together with the unaudited Annual Governance & Accountability Return (AGAR) Commencing 25 June 2026 and ending 5th August 2026.

36. GRANT – COMMUNITY UNITED

Proposed: Cllr Norman

Seconded: Cllr Harman

Resolved to award a grant of £2,000 for Community United, as set aside in the 2026/27 budget.

37. SUBSTITUTIONS

Proposed: Cllr Norman

Seconded: Cllr Drummond

Resolved to continue with the use of named substitutes for all committees and subcommittees, and where there are no named substitutes that all councillors not named on that committee/sub-committee be the named substitute.

38. EXCLUSION OF PRESS AND PUBLIC

Proposed: Cllr O’Keeffe

Seconded: Cllr Jee

Resolved that under section 1, paragraph 2 of the public bodies (admission to meetings) Act 1960 the press and public be excluded from the meetings for the following items of business as publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted.

39. INTERNAL AUDITOR

Proposed: Cllr Miller

Seconded: Cllr Thomas

Resolved to continue the appointment of Working the Greener Way continue as the independent internal auditor for 2026/27.

40. CONFIDENTIAL AND PRIVILEGED REPORT

Received the confidential and legally privileged report.

The confidential and privileged report was **reviewed** by council.

Proposed: Cllr O’Keeffe

Seconded: Cllr Drummond

Resolved to authorise the CEO to continue with Option B as presented in the Confidential and legally privileged report.

**THERE BEING NO OTHER BUSINESS THE CHAIRPERSON DECLARED THE MEETING CLOSED AT
21:52 HRS**

Signature:_____ Date:_____

Questions to Newbury Town Council meeting Monday 22 June 2026
From members of public

Madam Mayor,

Is the council aware that the majority of tenants are happy with Newbury Town Council's current administration of the allotments?

Speaking on behalf of Wash Common tenants, can you reassure them that the Allotment Working Group (AWG) has not been set up to change the way the allotments are administered?

Was due democratic process followed when the AWG was established at the Community Services Committee meeting on 30 March, and a tenant was appointed to the AWG before the proposal was even put before tenants and stewards at the Tenants Meeting on 9 April, only 10 days later?

Will the council undertake to ensure a constitution is drawn up for the AWG that will include a fair representation of members elected by their fellow tenants?

What does the council think the relationship should be between the AWG and the allotment stewards?

Does the council agree that the lovely community spirit and rewarding atmosphere on our allotments, where people can relax and grow produce, must be maintained.

Thank you.

Response from Newbury Town Council:

Thank you for your questions.

Newbury Town Council is aware that many allotment tenants value the current administration of the Council's allotment sites and the positive community spirit that exists across them. The Council shares this view and recognises the important contribution that allotments make to health, wellbeing, community cohesion and local food growing.

The Council can confirm that the Allotment Working Group (AWG) has not been established with the intention of changing the fundamental administration of allotments. The purpose of the Working Group is to provide a structured forum through which allotment tenants can contribute ideas, identify opportunities for improvement and assist the Council in considering matters affecting allotment provision.

With regard to governance, due process was followed in establishing the AWG. Under local government legislation and the Council's Standing Orders, committees are entitled to establish working groups and advisory groups to assist them in carrying out their responsibilities. Committees are also able to appoint individuals who are not elected members of the council to

serve on advisory working groups where this will assist the council in obtaining specialist knowledge, experience or community representation.

The AWG was established by resolution of the Community Services Committee. The appointment of an initial representative was undertaken as part of that process to assist with the development of the Working Group and its engagement with the wider allotment community. This does not prevent further representation being sought or appointed.

It is important to note that Working Groups do not possess any delegated decision making powers. They are advisory bodies only. Any recommendations made by the AWG will be reported to the appropriate Council committee for consideration. Decisions can only be taken through the Council's established committee structure and by formal resolution of the relevant committee or Council meeting, in accordance with the Council's Standing Orders.

The Council is currently progressing the membership of the AWG and is seeking broad representation from volunteer tenants across its allotment sites. The intention is to ensure that a wide range of views and experiences are represented. This approach reflects recognised allotment management good practice, which encourages meaningful tenant involvement and partnership working between allotment holders and the managing authority.

The Council also recognises the valuable role performed by allotment stewards. The AWG is not intended to replace or diminish that role. Rather, the working group and the stewards have complementary functions. The Council expects stewards to continue to provide site-level support and local knowledge, and they will be consulted on matters affecting allotment management. Their experience will remain an important part of the Council's decision making process.

Finally, The Council fully agrees that the positive community spirit, welcoming atmosphere and enjoyment experienced across Newbury's allotment sites should be maintained and strengthened. The purpose of the AWG is to enhance tenant engagement and ensure that all allotment holders have opportunities to contribute to future discussions. By providing representation from across the allotment community, the Council believes the AWG can help strengthen that community spirit while ensuring that any future recommendations are considered transparently through the Council's established democratic processes.

Appendix 2 Members Question:

Respect for the Mayor at meetings of Newbury Town Council has been paramount and honoured by attendees throughout the last 30 years. Therefore with that in mind can you Madam Mayor identify what action would be taken if any attendees at a full council meeting refuses to follow that procedure ?

Response from the Mayor

Thank you for your question.

The traditions and protocols associated with meetings of Newbury Town Council, including the practice of attendees standing when the Mayor enters or leaves the Council Chamber, are long-established customs which reflect respect for the office of Mayor and the civic traditions of the Council.

Whilst these customs are valued and have generally been observed by attendees over many years, they are matters of convention and courtesy rather than legal requirements. The Council cannot compel members of the public to stand, nor does the failure to do so automatically constitute a breach of the Council's Standing Orders.

However, the Mayor, as Chair of the meeting, is responsible for maintaining good order and ensuring that Council business can be conducted effectively. Under the Council's Standing Orders, the Chair has powers to address disorderly conduct where an individual behaves in a manner that disrupts the meeting.

If a person were simply to remain seated but otherwise behaved respectfully and did not interrupt proceedings, it is unlikely that any formal action would be required. The Mayor may choose to remind attendees of the Council's customs and expectations of courtesy.

If, however, a refusal to observe the convention formed part of behaviour that was disruptive, disrespectful, abusive, or intended to interfere with the conduct of the meeting, the Mayor could take action under the Council's Standing Orders relating to orderly conduct. Such actions may include:

1. Calling the individual to order and requesting that the behaviour cease.
2. Warning the individual that continued disruption may result in their removal from the meeting.
3. Ordering the removal of a member of the public whose conduct is preventing the proper conduct of Council business.
4. Adjournment or suspension of the meeting if necessary to restore order.

The Mayor would always seek to act proportionately, balancing respect for civic traditions with the rights of individuals attending public meetings, while ensuring that the meeting can proceed in a safe, orderly and respectful manner.

Internal Audit Recommendations 2025/26 & Update on Progress

Reviewed by Council 22/06/2026: Mins 32.2 – Internal Auditor’s 2025/26 recommendations – update on progress:

Resolved to approve the update on progress on the internal auditor’s 2025/26 recommendations.

Quarter	Ref	Formal / Best Practice	Recommendation	Progress & Lead Officer	Actions / Council Resolution
1	R1	Best Practice	Financial Regulations Review Financial Regulations and consider separating into Financial Regulations and Financial Procedures.	Reviewed and Closed (RFO)	Considered by the Audit Working Group & Policy & Resources Committee (P&R), mins 143 – 13/10/2025. Approved by Full Council, mins 60 – 20/10/2025 That one document be retained. This to keep the regulations and procedures in one place and avoid duplication across documents. Cross referencing with the Model regulations / Newbury Town Council regulations has been added to support the annual review of the Regulations. These references to be retained.
1	R2	Formal	Confidential Matters To consider utilising Confidential and Privilege reports as Appendices to Minutes to record the detail of all confidential matters in full compliance with Statute.	Reviewed and Closed (CEO)	Considered by P&R, mins 145 – 13/10/2025. Approved by Full Council, mins 60 – 20/10/2025. Implemented, as recommended.
1	R3	Formal	Councillor Substitution It is our opinion that ‘Substitution’ of Members may only be used at the Principal Authority level and not by Town and Parish Councils. We suggest that the Council discontinues the use of ‘Substitution’	Reviewed and Closed (CEO) Annual Review	Considered by P&R, mins 144 – 13/10/2025. Approved by Full Council, mins 60 – 20/10/2025. Substitution forms part of NALC Model Standing Orders (4.d.v.) The CEO to provide P&R with additional information from NALC and SLCC to support Council discussion / decision. P&R, mins 200 – 27/04/2026. The CEO’s paper to be taken to Full Council 06/05/2026, with the recommendation that Full Council agree a small Working Group to consider a recommendation with implementation detail, reporting to Full Council before end June 2026. Full council, mins 19 – 06/05/2026. Strategy Working Group to review and make recommendations.

					Full Council, mins 37 – 22/06/2026. Resolved to continue with the use of named substitutes for all committees and subcommittees and where there are no named substitutes that all councillors not named on that committee/sub-committee be the named substitute.
1	R4	Formal	Council Policies To expand the Council's portfolio of Policy documents, to meet current and ongoing requirements. Suggestions: 1) GDPR Policies 2) Privacy Policy 3) Burials Policy 4) Transfer of Exclusive right of Burial Policy 5) Shallow Graves Policy 6) Memorial Testing Policy 7) Memorial Policy 8) Cemetery Rules & Regulations Policy 9) Grant Aid Policy 10) Vexatious Complainant Policy 11) Allotment Rules & Regulations Policy 12) Complaints Procedure 13) Biodiversity Policy 14) Terms of Conditions of Hire 15) Safeguarding Vulnerable People & Children Policy 16) Modern Slavery Act 17) Anti Money laundering policy 18) Social Media & Electronic Communication Policy	In progress (CEO)	Considered by P&R, mins 158 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025. The P&R Committee agreed it needed more time to consider policies in greater detail prior to their adoption. Two members to be allocated to each policy by the CEO, for the purposes of consultation. Members to be from the P&R Committee and its regular Substitutes, excluding The Mayor. These allocations to include: a. Equality, Diversity & Inclusion – Councillor Elizabeth O'Keeffe b. Information Technology – Councillors Meg Thomas and Vaughan Miller c. Privacy Policy – Councillor Andy Moore. Other allocations to be at the CEO's discretion.
1	R5	Formal	GDPR Policies & Procedures We strongly encourage the CEO to draft an appropriate suite of GDPR and Data Protection policies for Scrutiny and onward Approval by Council Members. Further, a Document Retention policy should be drafted and maintained by the CEO to ensure that all council documentation, either electronic or had copy is secured and maintained appropriately and for the correct period of time.	In progress (CEO)	Considered by P&R, mins 158 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 Action as R4

1	R6	Best Practice	Cyber Essentials Certification Please note that the UK Government is increasingly focused on cyber security and will be bringing new legislation which will require a more stringent approach to this area of Corporate Governance to all government bodies. We strongly encourage the Chief Officer and the Council Members to work towards Cyber Essentials Certification during the 2025-26 financial year, as we are advised that this will become a minimum requirement for all Councils in England & Wales in the near future.	In progress (RFO)	Considered by P&R, mins 148 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 To work towards Cyber Essentials. Update: Discussion and quotation from IT support provider. Council set finance aside in an Ear Marked Reserve. Aim to have in place by 31/03/2027, if not before.
1	R7.1	Formal	Banking The RFO and Chief Officer should investigate alternative investment options for the Council to reduce the risk of having the majority of the public funds under the Council's management placed with one financial institution.	Closed (RFO) Annual Review	Considered by P&R mins 146 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 P&R discussed the pros and cons for banking diversification and resolved to recommend to Full Council not to diversify further at the present time, but to keep under annual review as part of the Council's Treasury Policy i.e. annually. £500,000 funds planned spending on the Community Café, leaving running costs and Ear Marked Reserves. Full Council agreed.
1	R7.2	Formal	Banking – Treasury Policy The RFO should review the Treasury policy and ensure that this is brought up to date in light of any decisions made in recommendation R7.1	In progress (RFO)	Considered by P&R, mins 158 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 Council to review Treasury Policy and bring up to date in light of decisions made in R7.1.
1	R8	Best Practice	Credit Card A credit card rather than a debit card should be utilised to make all online purchases with immediate effect. This will provide the Council with the extra protection of the Credit Card Charge Back scheme.	In progress (RFO)	Considered by P&R mins 147 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 The RFO to investigate an NTC Credit Card, and subject to an appropriate card being identified (a credit card is not offered by the Council's bank), to apply for it, subject to consultation with the Chair of P&R. The management team to recommend protocols, card holders and card limits for Committee approval. Meanwhile, the RFO has discussed the safeguards with the bank, which are safer than many. We are assured in writing: "our debit cards require an additional verification step when used online, but should Fraud happen, we investigate each one and refund the funds if found the

					payment was made fraudulently. Newbury Town Council also has a daily spending limit on each of our cards (£100 to £1,500 Officer dependent)”. Considered by P&R, mins 158 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 Addressed by CEO.
1	R9.1	Formal	Risk Management The CEO, RFO and Members should ensure that a reasonable and proportional approach is implemented in respect of all the Council’s Risk Management requirements. A robust and proportionate framework should be developed.	Closed (CEO)	
1	R9.2	Formal	Strategic Risk Register We take this opportunity to remind the CEO, RFO and Members that it is a statutory requirement to Review and Readopt the Council’s Risk Register(s) at least once annually, recording the Readoption in the Approved and Published Minutes in the corresponding Full Council or Committee Meeting	Closed (CEO)	Considered by P&R, mins 158 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 Noted and practiced
1	R10	Formal	Safeguarding Policies & Procedures The CEO must ensure that proper Safeguarding Policies and Procedures are implemented expediently and maintained thereafter.	In progress (CEO)	Considered by P&R, mins 158 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 Safeguarding Policy to be adopted Safeguarding Lead to be appointed Staff / Volunteers to be provided with Level 1 safeguarding training.
1	R11	Best Practice	Playground & Recreation area Risk Management Policy The CEO and the Parks & Open Spaces Supervisor should draft a reasonable and proportionate Playground & Recreation area Risk Management Policy for scrutiny and approval by Council Members.	In progress (CEO)	Considered by P&R, mins 158 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 To approve draft policy
1	R12	Best Practice	Contracts of Employment The CEO and Members should consider issuing all employees with the latest NALC model contracts, amended to reflect individual’s terms of employment, to ensure that the contracts are compliant with current employment legislation which has been updated recently.	In progress (CEO)	Considered by P&R, mins 148 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 To consider in discussion with HR Provider and discuss with Staff Sub.

1	R13	Best Practice	Fixed Asset Register The CEO, RFO and Members should consider acquiring the Rialtas Fixed Assets module for the Omega Accounting Software. This enables Assets to be added to the Register directly from the Purchase Ledger and Cashbook and direct input into the Annual Return at the year	In progress (RFO)	Considered by P&R, mins 148 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 Update SharePoint and Rialtas Software being compared in consideration of needs of Council. Council budgeted to enable this to be moved forward in 2026/27.
1	R14	Best Practice	Website Development The CEO, RFO and Members should consider a reimplementation of the Council's official website rather than a costly redesign, ensuring that the new website is fully compliant with current Accessibility Legislation. The Council has all the information it needs to populate a new website, and this could be achieved in a relatively cost effective and efficient manner.	In progress (CEO)	Considered by P&R, mins 148 – 13/10/2025 Approved by Full Council, mins 60 – 20/10/2025 Information not logically organised, can be difficult to navigate. Not compliant with current accessibility legislation Council has set budget aside in the 2026/27 budget for upgrade and to ensure compliance with Accessibility Legislation.
2	R15	Best Practice	Procurement The RFO and CEO should develop a formal Policy for the management of all competitive quotations and tenders. Which stipulates how such procurements are to be managed by the Council alongside the currently adopted Standing Orders and Financial Regulations. We recommend that a structured approach by value is utilised and have provided the RFO templated documentation for consideration and review.	In progress (RFO)	Considered by P&R – mins 172 – 19/01/2026. Approved by Full Council – mins 98 – 26/01/2026 Formal process within adopted Financial Regulations. To improve on this, Officers approved recommendations: Strengthening impartiality of procurement process for quotes over £3,000. Drafting procurement guidance to support Tenders over £30,000 inc. VAT.
3	R16	Formal	Minutes The Chief Officers should ensure that all Appendices referred to in the Approved and published Minutes of the Council and its Standing Committees (with the exception of Confidential Reports) are published on the Council's website.	To Implement & Closed. (CEO)	Considered by P&R – mins 006 – 08/06/2026 P&R recommendation to be discussed by Full Council – 22/06/2026. The CEO or RFO to advise all officers that with immediate effect, where the detail of a meeting resolution is not written out in full within the minutes, but is summarised from the detail provided within the agenda papers, the detail must be included as an appendix to the minutes. In practice, the easiest way is likely by amending the agenda paper, so it confirms the detail of the resolution (as opposed to the proposal for consideration).

					This applies to all Full Council, Committee and Sub-Committee meetings. E.g. Service Revenues agreed, Budget agreed, the Members, Chair and Deputy Chair for each Committee & Sub-Committee etc. The attached appendices must be published on the website and approved with the minutes. They do not need to be individually signed. The only occasion where the appendix is not shared with the public or published, is where confidential and privileged. This must be clear in the minutes, so the public are aware the appendix exists.
3	R17	Best Practice	Procurement The RFO and CEO should Consider producing a Summary Sheet for each significant procurement to be used as a supporting document index. This can provide invaluable support for finance staff and for the purposes of Internal and External audit. (Q4 renamed R17)	In progress (RFO)	Considered by P&R, mins 194 – 27/04/2026. P&R recommendation to be considered by Full council 22/06/26. To produce a summary sheet for significant procurement. E.g. To record comparative quotations centrally for each significant procurement, the value of which to be confirmed.
4	R18	Best Practice	Fraud Protection As stated, the Council already demonstrates robust procurement protocols. These could be strengthened by implementing a ‘No PO – No Pay’ Policy and Approved Suppliers policy which is clearly communicated via the Council’s official website under a dedicated ‘How we do businesses or procurement section: A) The Council should create a new section on its official website on how to do business with the Council which details the criteria that any prospective suppliers would need to meet to do business with the Council; B) The Finance & Corporate Services Manager should develop criteria for suppliers to achieve ‘Approved Suppliers’ status. This does not indicate any level of preference, rather the basis requirements for any supplier to work with the Council, i.e., Minimum number of year’s trading history, a number of	In progress (RFO)	Considered by P&R – mins 006 – 08/06/2026 P&R recommendation to be discussed by Full Council – 22/06/2026. <u>Suggested ‘No PO – No Pay’ Policy</u> The Finance Team will monitor when a PO is not written, investigate and consider the reasons. The RFO & CEO will make recommendations for Audit Working Group consideration. With recommended amendments, if appropriate, to the Financial Regulations to follow. <u>How we procure – recommendations A – C.</u> The RFO, with input from the CEO and officers who regularly procure goods and services, to, for P&R consideration: • draft criteria for both ‘approved supplier’ and ‘preferred supplier’ status and associated policies. • recommend the level (most likely at a level above £500.00) where procurement will be advertised on

			Business References, Appropriate Insurance etc., to be Approved by Members prior to implementation. C) All procurements in excess of £500.00 to be advertised on the procurement section of the Website and when the procurement has been completed and the contract awarded, that detail is recorded against the request for quotation. The above steps will not only provide an additional layer of protection from fraud for the Council, but it also has the effect of making the Council's operations more transparent to the electorate demonstrating how the Council is achieving best value for the money raised from the Precept. It also provides an opportunity for the Council to forge better working relationships with its suppliers as it can request suppliers to support various Council initiatives for youth work for example.		the Council's website (in addition to suppliers being directly approached for quotes). • Review and update NTC's Procurement Policy and Financial Regulations accordingly.
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