



Annual Governance Statement 2008/09



1. Scope of Responsibility

- 1.1 Thanet District Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. Thanet District Council also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2 In discharging this overall responsibility, Thanet District Council is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and the management of risk.
- 1.3 Thanet District Council has approved and adopted a Code of Corporate Governance, which is consistent with the principles of the CIPFA / SOLACE Framework Delivering Good Governance in Local Government. A copy of the code is on our website at http://www.thanet.gov.uk/pdf/Local_Code_of_Governance_V3.pdf or can be obtained from the Council offices, Cecil Street, Margate, Kent, CT9 1XZ. This statement explains how Thanet District Council has complied with the code and also meets the requirements of regulation 4(2) of the Accounts and Audit Regulations 2003 as amended by the Accounts and Audit (Amendment) (England) Regulations 2006 in relation to the publication of an annual governance statement.

2. The purpose of the governance framework

- 2.1 The governance framework comprises the systems and processes, and culture and values, by which the authority is directed and controlled and its activities through which it accounts to, engages with and leads the community. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise risks to the achievement of Thanet District Council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.
- 2.3 The governance framework has been in place at Thanet District Council for the year ended 31 March 2009 and up to the date of approval of the annual report and statement of accounts.

3. The governance framework

- 3.1 The Council identifies and communicates its aims and ambitions for Thanet for 2007 - 2011 through our Corporate Plan. The current Corporate Plan was agreed by Cabinet (14 June 2007) and Council (25 June 2007), and actions were then fed into Service Plans and through to appraisals. A refresh of the Corporate Plan was agreed by Cabinet on the 12 February 2009 and Council on the 26 February 2009. The Council has developed its Vision for Thanet and this is currently out to public consultation. In the future we will review our Vision for Thanet on a regular basis ensuring that it meets the requirements of our community, partners and other stakeholders.
- 3.2 The Council has adopted a Local Code of Corporate Governance (Council - 23 April 2009), which will be reviewed on an annual basis ensuring that the Council's governance arrangements are in place and are demonstrating good outcomes for our community and service users through good risk management, performance, financial and internal control processes. The Local Code was audited during March 2009 and received a reasonable assurance.
- 3.3 We measure the quality of services for users, ensuring that they are delivered in accordance with our objectives and represent the best use of resources through our performance reporting process. Officers report on service and corporate plan objectives and performance indicators within the monthly Manager's Tool. This information is collated within the monthly and quarterly performance reports as necessary, along with partnership performance reports. Reports from Service Managers are used by the Corporate Management Team to map progress of the plans in place and these go to Cabinet and Scrutiny. The performance framework is currently based on manual systems and processes, but as this is now so fundamental to good management practices the Council will be upgrading to an electronic performance management system during 2009/10. This will reduce time spent whilst improving access to valuable information.
- 3.4 The Council is committed to delivering value for money, and has published its Value for Money Strategy in its medium term financial plan for 2008 – 2011. It has developed a programme of reviews, which has Member involvement throughout the process, that will be used to test the value for money that it derives from its services and to assess the areas for improvement. The outcomes of such value for money assessments will be used to deliver real improvements in the efficient, effective and economic delivery of services and to inform the development of the future budget proposals and the medium term financial plan for 2009 – 2012.
- 3.5 Roles and responsibilities for Cabinet, Council, Overview and Scrutiny and all Committees of the Council, along with officer functions are defined and documented, with clear delegation arrangements and protocols for effective communication within the Council's Constitution. The Constitution is regularly reviewed and updated, with the next planned update due in June 2009.
- 3.6 The Cabinet is the part of the Council that is responsible for most executive decisions and for the period 2008/09 was made up of the Leader and 5 other Councillors. Each theme of the Corporate Plan is sponsored by a Cabinet Member as a Portfolio Holder. When key decisions are to be discussed or made these are published in the Council's Forward Plan and will generally be discussed in a meeting open to the public. The Cabinet has to make decisions that are in line with the Council's overall policies and budgets. Decisions outside the Budget and Policy Framework must be referred to Full Council. A "call in" procedure allows a Scrutiny Committee to review Cabinet decisions before they are implemented.

- 3.7 Codes of conduct defining the standards of behaviour for members, staff, our partners and the community have been developed and communicated and are available on the Council's web site and on TOM. These include:
- Members Code of Conduct
 - Code of Conduct for staff
 - Anti-fraud and corruption policy
 - Members and officer protocols
 - Regular performance appraisals, linked to service and corporate objectives
 - Service Standards that define the behaviour of officers
 - A Standards Committee comprising 8 Members, 3 independent members of the public (1 of which is Chair) and 2 Parish Council representatives
- 3.8 The principle of the formation of a Governance and Audit Committee was agreed by the Cabinet on the 23 March 2006 and adopted by Council on the 11 May 2006, and then re-constituted by Council in May 2007, May 2008 and May 2009. The Terms of Reference for the Committee were prepared in line with 'CIPFA's Audit Committees – Practical Guidance for Local Authorities' and the annual review of these Terms of Reference has taken place, and were last agreed by Council in May 2009. There is also a Governance Group in place, which is made up of each Director, a representative from the East Kent Audit Partnership, the Head of Legal and Democratic Services, the Communications and Marketing Manager and the Corporate Governance Officer. This Group meets on a quarterly basis in line with the timetable of the Governance and Audit Committee and is chaired by the Director of Finance and Corporate Services who is the Section 151 Officer.
- 3.9 The risk management strategy and associated process document underwent an annual review, which were approved by Governance and Audit Committee in September 2008 and then Cabinet in November 2008. Regular reports from the Council's risk register system were provided to the Governance and Audit Committee and the majority of the Corporate Management Team attended a workshop run by an external facilitator in January 2009, to review the Council's corporate risks, which will be incorporated into the Council's risk register system following the repopulation exercise being undertaken in June-July 2009.
- 3.10 The Council has a Business Continuity Management policy setting out the key principles for ensuring that its critical services are able to continue functioning in the event of disruptions. This document was reviewed and agreed by Governance and Audit Committee in December 2008 and then Cabinet in March 2009. Work is commencing on improving the Council's business continuity plans for critical services and corporate activities. These plans will outline how the Council would respond to major business continuity incidents and consequently increase the Council's state of preparedness.
- 3.11 Thanet District Council is required to ensure compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful. To this end, the Council has in place a number of procedures, protocols and processes that underpin the delivery of its services and functions. The Council's protocols or procedures are reviewed and updated on a regular basis for standing orders, standing financial instructions, a scheme of delegation and supporting procedure notes / manuals, clearly defining how decisions are taken and the process and controls required to manage risks.
- 3.12 The Council has in place a whistleblowing code whereby staff and others can report concerns about various sorts of wrongdoing or alleged impropriety. Council approved an updated Code in September 2007 which is available to staff via the intranet and is referred to in the Induction Training Programme. The Code is also proactively communicated to those contracting with the Council.

- 3.13 As Thanet District Council provides a wide range of services to approximately 130,000 residents and over 2 million annual visitors, the Council ensures that complaints, comments and compliments are investigated appropriately. The Council implemented an IT solution via the Civica W2 Corporate Complaints System on the 1 August 2007 to record complaints, comments and compliments. In October 2008 the enhanced Civica W2 Customer Feedback system was launched to provide improved access to internal users and a better reporting facility. Service improvements have been made as a direct consequence of complaints received, and this is shared with Members of the Council and the public through the Members' Portal and the Council's web site. The response time was reported through the Performance Packs and also on a quarterly basis to the Corporate Management Team. A page on the website has also been developed called 'You said ... we did', which is available to the public to see where improvements have been made to services by listening to the complaints or compliments made.
- 3.14 The development needs of senior officers in relation to their strategic roles, have been identified and the Learning & Development Strategy 2007-2011 outlines activities as follows:
- Support change management within the organisation by equipping managers and staff with the skills and knowledge necessary to successfully undergo change programmes.
 - To provide leadership and professional development opportunities for managers within the organisation that support best management practice and the managers charter guidelines.
 - Develop effective training and development frameworks to support senior managers and key officers with potential through a programme of talent management linked to the workforce development plan.
 - Take the management development programmes within the organisation further, review the effectiveness of existing programmes and investigate the potential for partnership delivery in East Kent.
 - Throughout 2008/09 officers with responsibility for risks and / or control measures in the Council Risk Register have been provided access to the system and received training on how to undertake a review. This encourages ownership of the risk or opportunity and helps embed this process throughout the Council.
- 3.15 The Council is planning to survey Members to identify future training needs, with a view to establishing a more formally structured Member development programme. Member Development sessions are programmed on a quarterly basis to ensure issues such as equalities, child protection and other governance processes are communicated as necessary to Members. A wide range of other Member development activities are undertaken, including a number of recent sessions on ethical standards and the Code of Conduct. In the case of the revised Members Code of Conduct agreed in May 2007, just over 70 Councillors attended training sessions throughout November 2007. There is a comprehensive induction programme for Members following District elections, and the Governance and Audit Committee receive regular training prior to the commencement of most meetings on matters relevant to the Group's remit.
- 3.16 The Council has established clear channels of communication with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation. All communication campaigns and community wide consultations are promoted to the council's list of 1,000 local groups and organisations. Included in this list are organisations that represent more vulnerable and harder to reach groups. Closer links have also been forged with local community groups through the development of the Community Network, a database of over 200 local groups and organisations who have agreed to participate in a range of council consultation. Engagement with the Network is part of the Council's formal consultation process, and has helped to further improve links with harder to reach groups in the area. The Community Network includes organisations

who work with children, the elderly, those with mental and physical disabilities, ethnic minority groups, people not in training, education and employment, the homeless, faith groups as well as many other specific interest groups in Thanet.

- 3.17 The Council recognised that incorporating good governance arrangements in respect of partnerships and other group working, as identified by the Audit Commission's report on the governance of partnerships, needed to be reflected in the authority's overall governance arrangements, and work commenced on producing a Partnership Framework and register for this purpose. This was launched during 2008/09 and received a reasonable assurance on the process and register following an audit by the East Kent Audit Partnership in March 2009. Further work is to be undertaken throughout 2009/10 to embed this further within the Council.
- 3.18 The Thanet Compact Implementation Group was re-established in 2007 following the efficiency review in 2006 and an officer assigned to take the implementation of the Thanet Compact forward. The Compact provides a framework for improving working relations between local public and Voluntary and Community Sector (VCS) organisations to strengthen relationships between partners for mutual advantage by establishing codes of practice that set out what partners can expect from each other. By following the codes and working within the "spirit" of the Compact, partner relations will change for the better and it will improve how partners engage, behave and work together at individual, organisational and partnership level.
- 3.19 The annual review of the Child Protection Policy and Procedure was completed and approved by Cabinet on 12 February 2008. The Council completed its annual 2004 Children's Act Section 11 Audit and reported its progress to Cabinet on the 12 February 2008 and this has been submitted to the Kent Safe Guarding Children Board. The Council's Child Protection Committee chaired by a member of the Corporate Management Team met 4 times during 2008/09 and to ensure continued statutory compliance has developed a detailed work plan for 2009/10. During 2008/09 the Council has run an internal Child Protection Awareness programme and will continue to do so during 2009/10. During 2008/09 the Council has worked in partnership with the other East Kent 4 districts on a Child Protection training programme and an external provider has been commissioned to deliver training during 2009/10.

4. Review of effectiveness

- 4.1 Thanet District Council has responsibility for conducting, at least annually, a review of effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the senior managers within the authority who have responsibility for the development and maintenance of the governance environment, the East Kent Audit Partnership's annual report, and also by comments made by the Audit Commission and other review agencies and inspectorates.
- 4.2 The processes that have been applied in maintaining and reviewing the effectiveness of the governance framework, have been undertaken through the following methods:
- 4.2.1 Gaining assurances from various areas such as Managers, Democratic Services, Human Resources, performance management, risk management, the Section 151 and Monitoring Officers and also Members of the Governance and Audit Committee.

- 4.2.2 Cabinet receiving quarterly Performance Packs to monitor achievement of key priorities, service objectives, performance indicators and budget spend with detailed budget monitoring reports being tabled quarterly.
- 4.2.3 Overview and Scrutiny reviewing the work and decisions of the Cabinet, and all areas of the Council's work, as well as carrying out specific projects and investigations and considering matters or services provided by an outside organisation that could affect the local residents. The Overview and Scrutiny Panel Chairman prepared a Scrutiny Annual Report for 2008/09 for Council in May 2009. This report detailed the achievements of the Overview and Scrutiny Panel covering the period 2007/09 and gives suggestions that the Panel has made for possible work plan items for 2009/10.
- 4.2.4 The Governance and Audit Committee approve the Internal Audit Plan each year. They receive regular reports from the East Kent Audit Partnership on their progress against this Annual Audit Plan which provides detail on the assurance levels that can be placed against the various systems and processes in place, and they also provide an annual assessment at year end. In March 2009 the Governance and Audit Committee agreed its annual report which is to be submitted to Council. This report details the achievements of the Committee against its terms of reference for the period 2008/09 and details the impact that it has made on the overall system of internal control in operation for that period.
- 4.2.5 Attendees at the Governance Group are all Directors, representatives from the East Kent Audit Partnership, Legal and Democratic Services and Communications & Marketing Section. The Director of Finance and Corporate Services (Section 151 Officer) chairs the meetings and may co-opt any other officers as is required. This Group's purpose is to monitor and review the risk, control and governance processes that have been established and address any upcoming processes when required.
- 4.2.6 The Standards Committee promote and maintain high standards of conduct by Councillors and co-opted members. They monitor the operation of the Members' Code of Conduct advising, training or arranging to train Councillors and co-opted members on matters relating to the Code where necessary. In February 2008 it was agreed that a third Independent Member of the Standards Committee be appointed.
- 4.2.7 The Internal audit function is an independent appraisal process operated by managers with direct access to Members, which seeks to provide management with a level of assurance on the adequacy of internal controls and of risks to the Council's functions / systems. The Internal Audit function for this Council is bought under contract from the East Kent Audit Partnership. This provides sound objectivity as well as benefiting from a large resource-pool which brings with it a good level of robustness. Throughout the year, the Internal Auditors have performed a wide range of reviews covering both financial matters and other more service / output specific objectives, including Value for Money assessments, the conclusion of which is a report that is produced for Management, which includes an assessment of the level of assurance that can be derived from the system of internal controls related to the service that is reviewed. It is the outcomes of these reports that are captured in the quarterly updates considered by Governance and Audit Committee Members.

- 4.2.8 During 2008/09 the Internal Auditors completed 392 days of review, which was spent undertaking 37 audits. Of these 17 were assessed as being able to offer substantial levels of assurance; 21 reasonable assurance; 9 limited assurance and only 2 were found to have no assurance. 24 other audits were on special investigations or work commissioned by management, which did not merit an assurance level. Taken together 78% of the reviews account for substantial or reasonable assurance, whilst only 22% of reviews placed a limited or gave no assurance to management on the system of internal control in operation at the time of the review. Where appropriate, the audit report provides management with a set of recommendations that are designed to address weaknesses in the system of internal control. The outcomes of these Internal Audit reviews are reported to the Governance and Audit Committee on a quarterly basis, giving Members an opportunity to understand the Council's compliance with key controls and to discuss any areas of concern with the Auditors.
- 4.2.9 The External Auditors are appointed to the Authority by the Audit Commission. They are required to conduct their audit work to the strictest standards as laid down by the Audit Code of Practice, which ensures that they approach the work with the highest level of objectivity. In addition to being appointed by a third party, their independence is further reinforced by the restrictions put into place on the levels of non-audit work able to be purchased from external auditors. The External Auditors provide another area of assurance, which is an essential element in the process of accountability for public money and makes an important contribution to the stewardship of public resources and the corporate governance of the Council. They undertake a series of thorough and comprehensive audits that cover matters including financial reporting, financial stewardship and the Council's approach to its use of resources.
- 4.2.10 The Audit Letter - Each year the Authority receives a report from its External Auditor on the quality of its financial and management administrative arrangements. The most recent Audit Letter, which was presented for Members' consideration at the Governance and Audit Committee meeting on 17 March 2009, indicated that the Authority's service improvements, as measured by performance indicators have been strong this year. The Council continues to focus on improving outcomes for local communities linked to its ambitions
- 4.2.11 Use of Resources Outcomes - In March 2009 the Authority was advised that it had achieved an overall level 3 in Use of Resources Assessment under the Comprehensive Performance Assessment (CPA) which means that the Council is judged to be consistently above minimum requirements - performing well. In terms of internal control issues within the report, there were a few areas where the auditors identified areas for improvement; around embedding the new partnership arrangements and driving forward the level of effectiveness of the Governance and Audit Committee. These will be taken into account when setting the improvement action plan for 2009/10.
- 4.3 We have been advised on the implications of the result of the review of the effectiveness of the governance framework by the Governance and Audit Committee and Governance Group and a plan to address weaknesses and ensure continuous improvement of the systems in place.

5. Significant governance issues

5.1 Within this section are the governance issues identified in the 2007/08 Annual Governance Statement action plan, which have not been completed for various reasons and will therefore be updated and incorporated into the 2008/09 action plan.

- Business Continuity arrangements have yet to be put in place for some service areas and Corporate Business Continuity Plan needs to be finalised and tested. These need to be done with careful regard for the Council's Emergency Plan to ensure certainty of roles in emergency plan responses.
Proposed action: Business Continuity arrangements are being progressed through the Governance Group and proposals will be made to ensure this matter is completed during 2009/10. Once the business critical functions have been identified, required procedures can then be written where lacking and detailed within personal appraisals. The roles and responsibilities for Emergency Planning will be addressed through the current review of the Major Emergency Plan.
- The constitution is in need of continual review and update, and a local "decision-making guide" will be produced for officers. Due to staffing shortages this project was delayed, however there are sufficient resources now in place.
Proposed action: The Legal and Democratic Services service plan has objectives relating to the Constitution, and targets set for completion in 2009/10.
- Health and safety risk assessments need a thorough review to ensure they encompass lone working, out of hours and enforcement tasks and a corporate approach is needed, especially in high risk areas such as Grounds Maintenance, the Port and Harbour and Waste & Recycling.
Proposed action: The risk assessment process needs to be addressed to provide assurance to the Corporate Management Team.
- To be effective the new Corporate Plan must have specific and measurable targets against the new priorities to enable residents to gauge progress on the Corporate Plan over the coming year.
Proposed action: Ensure that all future Corporate Plan objectives are SMART, and this process will be monitored and challenged through Policy and Performance.
- There is no corporate approach to ensuring that all equipment and portable assets are properly safeguarded and controlled.
Proposed action: A corporate procedure to address this issue will be produced and disseminated throughout the authority, to address issues such as inventories and insurance.
- The East Kent Audit Partnership's work throughout 2007/08 indicated areas of concern regarding systems of internal control in the following areas: Cliftonville West Renewal area; Risk Management of partnerships and Freedom of Information Management.
Proposed action: In each of the cases indicated above, actions plans have been agreed with Managers and are being progressed as directed.

- The effectiveness of debt recovery action and the costs of inefficient recovery need to be considered.
Proposed action: The Council's approach to debt recovery is reviewed by the Income Management Group, which will monitor the performance of recovery action and make changes to processes to improve efficiencies where appropriate.
- A property survey and assessment of backlog maintenance for general fund properties is out of date and therefore identified as a weakness.
Proposed action: The Council has allocated £250,000 to update its property register, including valuations, surveys and agreements. So far 50% of the update is complete. It is already enabling the new Asset Management Strategy to implement 'planned' rather than 'reactive' repairs.
- There were minor concerns around the knowledge of the content of some corporate policies / strategies and frameworks, such as Corporate Equalities Policy and the implications for some service areas.
Proposed action: The process for rolling out such documents has been reviewed which needs to be communicated to all staff. A communications plan is being developed and will be actioned throughout 2009/10.

5.2 The identified areas detailed below have arisen from our numerous assessments into the Council's governance arrangements for 2008/09 and having been deemed to be significant by the Governance Group will be addressed during 2009/10. These do not duplicate any issues remaining from the 2007/08 action plan.

- A number of projects are being worked on that are looking at opportunities for collaboration with other local authorities. These have the potential to consume significant Council resources (mainly staff time) and do raise some concerns around capacity and governance issues.
Proposed action: This has been added to the Council's corporate risk register and actions to mitigate and manage the risk will be developed and implemented.
- Member training and development needs, especially around specific areas such as Planning, Scrutiny and Governance, needs to be enhanced to ensure that the Committees are effective and that Members are suitably able to undertake their roles within these Committees.
Proposed action: The Council plans on surveying Members to identify future training and development needs, with a view to establishing a more formally structured Member development programme.
- The East Kent Audit Partnership's work throughout 2008/09 indicated areas of concern regarding systems of internal control in the following areas: compliance with Contract Procedure Rules, business continuity arrangements, insurance review and VfM arrangements for Maritime Services.
Proposed action: In each of the cases indicated above, actions plans have been agreed with Managers and are being progressed as directed.
- A risk has been raised arising from concerns that the Council does not invest sufficiently in the upkeep of its physical assets due to lack of financial resources. These are deteriorating gradually in quality and utility.
Proposed action: This will need to be added to the risk register and where appropriate the Council will seek sources of internal and external funding or income to undertake significant maintenance or transfer liabilities to third parties.

- The Council's partnership register needs to be communicated to all officers and members to ensure that it is completed, and also remind those responsible to undertake appropriate risk assessment of partnerships.
Proposed action: Additional staff resource has been identified that will be given specific responsibility to undertake this task.
- Training and communications plan needs to be developed to further embed risk management within the organisation.
Proposed action: Training and communications plan developed.

5.3 Through the assurance gathering process, other areas of concern were raised which are not governance issues but it was agreed that these would be incorporated into the action plan with appropriate actions so that they are also addressed.

- Members need to ensure that they request, and officers need to ensure they provide, information on ward and portfolio matters at the appropriate time to permit constructive challenge and good decision making.
Proposed action: New member complaint system will permit closer tracking of member requests for action. Decision making protocols will be developed to provide clarity on Members' and officers' roles, and then continually promoted through managers' conferences.
- There is still a mismatch between the aspirations of the Council and its capacity to deliver these. This gap has been reduced by refreshes of the Corporate Plan and Service Plans but still exists, especially given the tight economic environment.
Proposed action: No action planned at departmental level as service plan matches resources available. This will be taken into account when developing the next Medium Term Financial Plan.
- The Council relies on staff consistently working for longer than their contracted hours, with increasing frequency due to staff numbers having reduced to make budget savings.
Proposed action: This will be incorporated into the Council's risk register once it is refreshed and alternative management approaches considered to reduce any risks arising.
- Some managers felt that further training was required on budget management and Cedar financial system.
Proposed action: The finance section to provide such training on request from managers.
- In some areas process and procedure manuals are not in place, or need reviewing to ensure they are comprehensive and fit for purpose.
Proposed action: Services to review their own requirements as appropriate and develop necessary documents possibly by using the workflow process through Civica.
- Limited internal specialist support available (such as engineers, property, legal) at peak times.
Proposed action: This will be incorporated into the Council's risk register once it is refreshed, however the progress on shared services will provide an option for resolving this problem.

- Recent changes in staffing structures may have destabilised or confused areas of responsibilities and authorities.

Proposed action: Provide reminder advice to all senior /middle managers to be clear of own authorities and to recommend that Members clarify officer authorities prior to implementation of any decisions that have a material effect on either council policy or financial position.

- 5.4 We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements, and these will be regularly reported to the Governance and Audit Committee. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

Signed by:
Councillor Sandy Ezekiel
Leader of the Council

24 June 2009

Signed by:
Richard Samuel
Chief Executive

24 June 2009