



You are hereby summoned to attend the meeting of Haverhill Town Council to be held in The Studio, Town Hall, High Street, Haverhill, on Tuesday 18th January 2011 commencing at 7.00 p.m., for the purpose of transacting the following business

CONSTITUTION:	Town Mayor:	Cllr. E McManus
	Town Councillors:	L Ager, L Burgess, M Byrne, L Carr, P French, A Gower, P Hanlon, P McManus, M Marks, Mrs M Martin, G Price, K Richardson, A Samuels Mrs A Snape and C Turner

AGENDA

1. **Apologies for Absence**
Please give any apologies to the office by 5.00p.m. of the day of the meeting.
2. **Declaration of Interests**
For Members to declare any interests they may have on items on the agenda.
3. **To confirm Minutes of Meeting held 4th January 2011**
4. **To deal with any urgent matters arising from the Minutes not covered by this agenda**
5. **The Future of Homes for Older People**
To respond to the consultation.

PUBLIC FORUM

6. Adoption of Committee Reports

Planning Committee

To move the adoption of the minutes of the Planning Committee meetings held 12th October, 2nd November 2010 and 14th December.

Arts & Leisure Committee

To move the adoption of the minutes of the Art & Leisure Committee meetings held 12th October and 9th November 2010.

Personnel Committee

To move the adoption of the minutes of the Personnel Committee meeting held 9th November 2010.

Community First Committee

To move the adoption of the minutes of the Community First Committee meeting held 16th November 2010.

Finance Committee

To move the adoption of the minutes of the Finance Committee meeting held 14th December 2010.

8. **Selection of Potential Savings Areas**

For Members to agree areas for investigation as to future savings.

9. **For Members to be Briefed on, and Understand the Implications of, the introduction of Referendums on Excessive Council Tax Increases from 1st April 2012**

For Members to be briefed on, and understand the implications of, the introduction of referendums on excessive council tax increases from 1st April 2012

10. **For Members to Note the Initial Response to the Arts Centre Grant Negotiations and Agree Any Changes to the Grant Request**

For members to note the initial response to the Arts Centre Grant negotiations and agree any changes to the grant request

11. **External Audit (attached)**

To note the completion of the External Audit, the comments of the External Auditor, and to implement such action as is required.

12. **Divestment Opportunities**

To confirm an interest in any future divestment opportunities in respect of the Youth Service and the Library.

13. **To Respond to Consultation on the Local Councils Practitioners Guide (attached)**

To Respond to the consultation.

14. **To Note Changes to the Library Service and Agree Any Necessary Action (if available)**

To note changes to the Library Service and agree any necessary Action (if available)

15. **To authorise payments.**

To authorise the following cheque lists:-

Date	Cheque No.s	Value
14.09.10	6178-6188	2,345.34
14.09.10	6189	34,018.46
21.09.10	6190-6209	9,538.80
28.09.10	6210-6234	25,333.05

28.09.10	6235	400.00
5.10.10	6236-6256	6,018.46
12.10.10	6257-6277	17,915.11
19.10.10	6278	34,959.02
19.10.10	6279-6293	19,052.35
19.10.10	6294	400.00
26.10.10	6295-6326	11,960.89
26.10.10	6327-6328	202.35
9.11.10	6329-6339	9,597.23
9.11.10	6340	34,739.51
16.11.10	6341-6375	84,174.85
16.11.10	6376-6378	271.90
23.11.10	6379-6400	29,264.58
30.11.10	6401	213.00
30.11.10	6402-6419	9,735.11
7.12.10	6420	200.00
7.12.10	6421-6442	17,324.76

16. **To receive urgent correspondence**

17. **Closure**



Gordon Mussett
Town Clerk

DATE: 12th January 2011

J PAG

Joint Practitioners
Advisory Group

19 November 2010

Sent by email
Rod Latham
SLCC

Direct line 01823 252515
Email jpag-consultation@audit-commission.gov.uk

Dear Rod

Consultation: Amendments to Local Council Practitioners' Guide

Further to my letter to you dated 10 August 2010 on this subject, please find attached the draft of new paragraphs 3.29 to 3.64 of the Practitioners' Guide for local councils in England as recently approved by JPAG for wider consultation.

We propose to issue the new subsection - *Managing money: proper practices* - in response to the proposed repeal of s150 (5) of the Local Government Act 1972 ('LGA 1972').

Paper 1/2 presented at the JPAG meeting on 11 November 2010 discusses the background to this change. I enclose a copy plus attachments.

The consultation among practitioners and stakeholders seeks responses to the following:

1. Does this non-statutory, principles-based guidance provide a strong enough safeguard over public money managed by local councils in England to replace the statutory safeguard provided by s150 (5) of LGA 1972?
2. Do the minimum applicable proper practices described (the 'must' statements highlighted throughout the guidance in bold), represent a suitable framework to safeguard adequately public money managed by all local councils in England?
3. Is the guidance fit for purpose for all local councils in England:
 - Are there any omissions from the guidance?
 - Does the guidance contain any guidance that is unnecessary?

c/o Audit Commission, 1st Floor, Millbank Tower, Millbank, London, SW1P 4HQ
T 0844 798 1212 F 0844 798 6187 www.audit-commission.gov.uk

In addition, new paragraph 3.30 defines the meaning of the words 'must', 'should' and 'may' in the new section only. We invite consultees to comment on whether JPAG should take this approach throughout the Practitioners' Guide to identify and clarify what are fundamental proper practices ('must' statements) and minimum standards for compliance by local councils.

We invite NALC and SLCC to engage with their wider memberships on this consultation. A coordinated response of members' views by NALC and SLCC is preferable, but individuals, local councils or County Associations may wish to reply direct to by emailing jpag-consultation@audit-commission.gov.uk . We are grateful to the Audit Commission for facilitating this consultation.

This is a 'technical' consultation lasting six weeks. Please send responses by the **closing date of 7 January 2011**.

Yours sincerely

Sent by email on behalf of Peter Lacey

Peter Lacey
Chair JPAG

Managing money: proper practices

Overview

3.29 The guidance in this section defines proper practices for managing money. It supports local councils in safeguarding the risks to the funds they steward and the services they represent. It:

- defines 'must', 'should' and 'may';
- defines 'money';
- describes changes to the statutory environment;
- sets out the legal framework;
- identifies roles and responsibilities for members;
- describes corporate arrangements for monitoring and scrutiny; and
- describes corporate arrangements for managing risk, error and fraud.

Definition of 'must', 'should' and 'may'

3.30 In this section:

- **'Must' identifies those requirements that failure to meet represents non-compliance with this proper practice. They are shown in bold type;**
- 'Should' identifies the minimum level of acceptable proper practice. A council applying discretion based on risk assessment can replace 'should' requirements with ones that are more demanding; and
- 'May' identifies practices for the council to consider and apply by exercising its discretion.

What is money?

3.31 'Money' includes cash and all other forms of negotiable instrument and stores of value that can easily be converted into cash. For example, a non-exhaustive list of money includes:

- physical cash and notes, petty cash and unclaimed receipts, imprest accounts, cash in transit;
- unpaid income held by debtors;

The general duty

Local councils must have in place safe and efficient arrangements for managing money to the highest standard of honesty and integrity.

Arrangements should allow local councils safely to upgrade the quality of their funds movements and take advantage of efficiencies from modern banking methods while continuing to protect assets and the public purse.

- signed and unsigned cheques, drafts and other orders for payment;
- current, deposit and investment accounts at banks and financial institutions and access to undrawn borrowing facilities;
- credit cards (where held – see below), debit cards, store cards, fuel cards;
- access to balances by telephone or electronic transfer; and
- the ability to buy goods or services on credit.

3.32 Where any doubt exists over what constitutes money, councils should presume that it is within the scope of the definition. The definition covers all accounts held with financial institutions and controls over access whether physical or electronic.

Changes to the statutory environment

3.33 Councils have to respond to two key changes in the statutory environment for payments by local councils.

3.34 Firstly, the Payments Council¹ set out a strategic vision for UK payments in 2008². The plan accepts the long-term decline in the use of cheques and sets 2018 as a target closure date for cheque clearing. Local councils therefore need to identify safe and efficient alternative methods of payment for goods and services.

3.35 Secondly, the repealed Section 150(5) of the Local Government Act 1972 governed the stewardship of money by local councils. It required that 'every cheque or other order for the payment of money shall be signed by two members of the council'.

3.36 While supporting progress, central government expressed concern that 'the removal of S 150(5) should not leave the public funds controlled by parish councils at any greater risk of loss through misconduct or poor control'³ and that 'safeguards be put in place (so) that all the payments made by parish councils are legitimate and that there is no misuse of the system.'⁴

The roles and responsibilities of the Responsible Finance Officer (RFO)

3.37 The law requires every local authority to arrange for the proper administration of its financial affairs and that one of its officers has responsibility for those affairs⁵. This officer is the Responsible Financial Officer (RFO).

¹ Set up by the payment sector, supported by HM Treasury and the Office of Fair Trading (OFT) to undertake a strategic role in the development of payments in the UK

² http://www.paymentscouncil.org.uk/payments_plan/

³ Letter dated 21 July 2010 From Rt. Hon Grant Shapps MP, Minister for Housing and Local Government to NALC, SLCC and other stakeholders.

⁴ CLG Ministerial Statement 9 October 2010
www.communities.gov.uk/newsstories/newsroom/1735546

⁵ section 151 Local Government Act 1972

⁶ Statutory requirements for security arrangements in relation to officers controlling money are found in S 114 of LGA 1972

3.38 Even where a local council has not made a formal appointment, there is always a council RFO in all circumstances. By default, the RFO is the person responsible for keeping the accounts. The council should appoint a temporary RFO if the appointed RFO is unavailable through absence or illness.

3.39 The RFO should be familiar with statutory duties for the financial administration and stewardship of the local council which arise from:

- Sections 114 and 151 of the Local Government Act 1972
- The Local Government and Housing Act 1989
- The Accounts and Audit Regulations 2003 (as amended) ('the Regulations')

3.40 The responsibilities of the RFO for managing money are to advise the council on:

- the corporate financial position;
- the key financial controls necessary to secure sound financial management; and
- its treasury (that is cash and investments) management.

Roles and responsibilities of members

3.41 **Proper arrangements to protect money are grounded in good practice and councils must review their effectiveness regularly to identify and protect against possible risks.**

3.42 A local council's members are jointly and individually responsible for putting proper governance arrangements in place to safeguard public funds. Councils may delegate the role of protecting its money to individuals, for example to the Clerk or the RFO, but the legal responsibility always remains with the council and its members.

3.43 Arrangements should demonstrate how the council intends to meet its responsibilities within the legal framework. They should be current and include the specific duties and responsibilities of named individuals for securely managing money and arranging its security, as well as for identifying internal controls and supervision measures.

3.44 The council may seek external advice and guidance if it does not have sufficient or appropriate internal expertise or knowledge. Reviews of arrangements may be carried out by members or by Internal Audit.

Corporate arrangements for monitoring and scrutiny

3.45 **Councils must identify and protect all sources and forms of income and expenditure and the money represented by each. They must ensure that controls over money are embedded in Standing Orders and Financial Regulations.**

3.46 **Councils must not relinquish the 'two member signatures' control over cheques and other orders for payment until they have put in place safe and efficient arrangements in accordance with this guidance.** The 'two member signatures' control is just one of many possible controls but by itself it is unlikely to meet the requirements of the general duty of care.

3.47 **The council must approve the setting up of and any changes to all accounts with banks or other financial institutions.**

3.48 **A decision to enter a 'pooling' or 'sweep' arrangement whereby the bank aggregates the council's various balances daily to minimise interest costs, must be approved by the council.**

3.49 **Where held, corporate credit card accounts must be set up to operate within a limit set by the council and to be cleared monthly by direct debit from the main bank account.**

3.50 The council should approve the bank mandate, including the list of authorised signatures and the limits of authority on each account as well as any amendments. Where multiple accounts are held, authorised

signatures should not be allocated to just a few members; sharing responsibility adds to control. Authorised signatories should be rotated.

- 3.51 Internal controls set out within Financial Regulations should include the temporary holding, transit and permanent storage of money.
- 3.52 Councils should set out clearly in writing the responsibilities of officers and their managers in relation to money. Where employees have responsibilities for collecting money or making payments, their terms and conditions of employment should include adherence to internal controls, including any updates. Officers should acknowledge in writing they have understood these special responsibilities and received appropriate training.
- 3.53 When recruiting officers to be responsible for money and funds management, or when choosing members to be controlling account signatories, councils should consider a Criminal Records Bureau (CRB) check before appointment and periodically thereafter. Any decision not to carry out a CRB check should be clearly documented.
- 3.54 Councils should avoid the use credit cards as they do not meet minimum money control standards and present unacceptable and unnecessary risks to public funds.

Corporate controls to manage risk, error and fraud

3.55 Risk assessment and internal controls must focus on the safety of the council's assets, particularly money. Councils must practice a clear segregation of duties regarding money and its movements.

3.56 Councils must be constantly vigilant and avoid complacency about managing money.

3.57 Members should keep themselves informed so that they can address known risks and threats to money. Councils may engage with the police and local anti-fraud and corruption networks to keep up to date with risks and security threats.

3.58 Insurance is an important tool in any security plan. Fidelity Guarantee or any other form of insurance over threats to money is not by itself acceptable protection for the council's funds. Insurance should always be adequate to cover risk exposure. Insurers do not, as a general rule, pay claims where internal controls are inadequate or unenforced. Police investigations are hampered and prosecutions weakened by lax controls over vulnerable assets.

3.59 The council should insist on accurate record keeping of transactions by regular review. Rotation of responsibilities should be practiced to avoid familiarity.

3.60 Members should always be aware about where their money is and who has access to the funds they are responsible for. A listing of all accounts held, their current authorised signatures and their current balances should be available for members in the form of bank reconciliation. Councils should expect to see a bank reconciliation produced by the RFO at every council meeting. In the event of bank reconciliation discrepancy, explanations should be checked and verified independently. A failure to produce bank reconciliation indicates a possible threat to financial resources.

3.61 Transfers between bank accounts are excluded from bank reconciliation but should be subject to the same authorities and controls as other payments and receipts. Therefore, a listing of non- 'pooled' or 'swept' inter account transfers made during the year should be maintained and made available to members or auditors on request.

3.62 Councils may from time to time wish to ask banks and other institutions holding the council's funds for written confirmation of balances. This should be sent to a named member who is not an authorised signatory.

This is a particularly important control where paper statements are not received and reliance is placed on electronic information.

- 3.63 The RFO should issue any cheques or other orders for payment immediately after approval by the council. Cheques approved for payment by the council but held back by the RFO are not only vulnerable to theft or misappropriation but can result in an over-optimistic view of available financial resources.
- 3.64 Trade credit arrangements with local suppliers should be cleared monthly. This not only meets government targets on proper payments procedures by local government bodies but also supports local businesses that should not be called on to finance local councils.

Local Councils in England

Annual return for the year ended 31 March 2010

Local councils in England with an annual turnover of £1 million or less must complete an annual return summarising their annual activities at the end of each financial year. In this annual return the term 'local council' means a Parish Meeting or a Parish Council or a Town Council.

The annual return on the following pages is made up of four sections:

- Sections 1 and 2 are to be completed by the person nominated by the local council.
- Section 3 will be completed by the external auditor.
- Section 4 is to be completed by the local council internal audit provider.

Each local council must ensure this annual return is approved no later than 30 June 2010.

Completing your annual return

Guidance notes, including a completion checklist, are provided on page 6 and at relevant points in the annual return.

Please complete all sections highlighted in green. Do **not** leave any green box blank. Incomplete or incorrect returns may require additional external audit work and incur additional costs.

Please send the annual return, together with your bank reconciliation as at 31 March 2010, an explanation of any significant year on year variances in the accounting statements and any additional information requested, to your appointed external auditor by the due date.

If required, your auditor will identify and ask for any documents needed for audit. Unless requested, please do **not** send any original financial records to the external auditor.

Audited and certified annual returns will be returned to the council for publication or public display of sections 1, 2 and 3.

It should not be necessary for you to contact the external auditor or the Audit Commission directly for guidance.

More guidance on completing this annual return is available in the Practitioners' Guide for local councils that can be downloaded from www.nalc.gov.uk or from www.slcc.co.uk

Section 1 – Accounting statements for 10 annual return

HAVERHILL TOWN COUNCIL

Readers should note that throughout this annual return references to a 'local council' or 'council' also relate to a parish meeting.

	Year ending		Notes and guidance
	31 March 2009 £	31 March 2010 £	
1 Balances brought forward	372,297	491,713	Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.
2 (+) Annual precept	579,331	600,922	Total amount of precept receivable or received in the year.
3 (+) Total other receipts	454,939	427,412	Total receipts or income as recorded in the cashbook less the precept received. Includes support, discretionary and revenue grants.
4 (-) Staff costs	342,764	385,617	Total expenditure or payments made to and on behalf of all employees. Include salaries and wages, PAYE and NI (employees and employers), pension contributions and employment expenses.
5 (-) Loan interest/capital repayments	0	0	Total expenditure or payments of capital and interest made during the year on borrowings (if any).
6 (-) Total other costs	572,089	570,595	Total expenditure or payments as recorded in the cashbook less staff costs (line 4) and loan interest/capital repayments (line 5).
7 (=) Balances carried forward	491,713	563,835	Total balances and reserves at the end of the year. Must equal (1+2+3) – (4+5+6)
8 Total cash and short term investments	529,905	601,119	The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – to agree with bank reconciliation.
9 Total fixed assets and long term assets	205,591	212,153	The recorded book value at 31 March of all fixed assets owned by the council and any other long term assets e.g. loans to third parties and any long term investments.
10 Total borrowings	0	0	The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).
11 Trust funds (including charitable) disclosure note	YES	YES	The council acts as sole trustee for and is responsible for managing trust funds or assets. (Readers should note that the figures above do not include any trust transactions.)

I certify that the accounting statements in this annual return present fairly the financial position of the council and its income and expenditure, or properly present receipts and payments, as the case may be, for the year ended 31 March 2010.

Signed by Responsible Financial Officer

60 MAY REQUIRED

Date 22/6/10

I confirm that these accounting statements were approved by the council and recorded as minute reference

176M J12 REFERENCE

Date 22/6/10

Signed by Chair of the meeting at which these accounting statements were approved.

60 MAY REQUIRED

Date 22/06/2010

Section 2 – Annual governance statement

We acknowledge as the members of Haverhill Town Council our responsibility for ensuring that there is a sound system of internal control, including the preparation of the accounting statements. We confirm, to the best of our knowledge and belief, with respect to the accounting statements for the year ended 31 March 2010, that:

	Agreed – Yes or No*	'Yes' means that the council:
1 We have approved the accounting statements which have been prepared in accordance with the requirements of the Accounts and Audit Regulations and proper practices.	YES	prepared its accounting statements in the way prescribed by law.
2 We have maintained an adequate system of internal control, including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	YES	made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.
3 We have taken all reasonable steps to assure ourselves that there are no matters of actual or potential non-compliance with laws, regulations and codes of practice which could have a significant financial effect on the ability of the council to conduct its business or on its finances.	YES	has only done things that it has the legal power to do and has conformed to codes of practice and standards in the way it has done so.
4 We have provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	YES	during the year has given all persons interested the opportunity to inspect and ask questions about the council's accounts.
5 We have carried out an assessment of the risks facing the council and taken appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	YES	considered the financial and other risks it faces and has dealt with them properly.
6 We have maintained throughout the year an adequate and effective system of internal audit of the council accounting records and control systems and carried out a review of its effectiveness.	YES	arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether these meet the needs of the council and reviewed the impact of this work.
7 We have taken appropriate action on all matters raised in reports from internal and external audit.	YES	responded to matters brought to its attention by internal and external audit.
8 We have considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on the council and, where appropriate have included them in the accounting statements.	YES	disclosed everything it should have about its business activity during the year including events taking place after the year-end if relevant.
9 Trust funds (including charitable) – in our capacity as the sole managing trustee we have discharged our responsibility in relation to the accountability for the fund(s)/assets, including financial reporting and, if required, independent examination or audit.	YES	has met all of its responsibilities where it is a sole managing trustee of a local trust or trusts.

This annual governance statement is approved by the local council and recorded as minute reference

LOCAL ITEM 12 MINUTE REFERENCE dated 22/6/10

Signed on behalf of Haverhill Town Council

Signed by: Chair Enamorus REQUIRED Date 22-06-2010

Signed by: Clerk Gemma REQUIRED Date 22-6-10

*Note: Please provide explanations to the external auditor on a separate sheet for each 'No' response that has been given; and describe what action is being taken to address the weaknesses identified.

Section 3 – External auditor's certificate and opinion

Certificate

We certify that we have completed the audit of the annual return for the year ended 31 March 2010 of

ENTER ENTER NAME OF Haverhill Min Council

Respective responsibilities of the council and the auditor

The council is responsible for ensuring that its financial management is adequate and effective and that it has a sound system of internal control. The council is also responsible for preparing an annual return which:

- summarises the council accounting records for the year ended 31 March 2010; and
- confirms and provides assurance on those matters that are important to our audit responsibilities.

Our responsibility is to conduct an audit in accordance with guidance issued by the Audit Commission and, on the basis of our review of the annual return and supporting information, to report whether any matters that come to our attention give cause for concern that relevant legislation and regulatory requirements have not been met.

External auditor's report

(~~Except for the matters reported below~~)* on the basis of our review, in our opinion the information contained in the annual return is in accordance with the Audit Commission's requirements and no matters have come to our attention giving cause for concern that relevant legislation and regulatory requirements have not been met. (*delete as appropriate).

(continue on a separate sheet if required)

Other matters not affecting our opinion which we draw to the attention of the council:

(continue on a separate sheet if required)

External auditor's signature

BDO LLP

External auditor's name

BDO LLP Southampton
United Kingdom

Date

21/9/10

Note: The auditor signing this page has been appointed by the Audit Commission and is reporting to you that they have carried out and completed all the work that is required of them by law. For further information please refer to the Audit Commission's publication entitled *Statement of Responsibilities of Auditors and of Audited Small Bodies*.

Section 4 – Annual internal audit report to

ENTER NAME OF LOCAL AUTHORITY Haverhill Town Council

The council's internal audit, acting independently and on the basis of an assessment of risk, carried out a selective assessment of compliance with relevant procedures and controls expected to be in operation during the financial year ended 31 March 2010.

Internal audit has been carried out in accordance with the council's needs and planned coverage. On the basis of the findings in the areas examined, the internal audit conclusions are summarised in this table. Set out below are the objectives of internal control and alongside are the internal audit conclusions on whether, in all significant respects, the control objectives were being achieved throughout the financial year to a standard adequate to meet the needs of the council.

Internal control objective	Agreed? Please choose from one of the following Yes/No*/Not covered**
A Appropriate books of account have been properly kept throughout the year.	YES
B The council's financial regulations have been met, payments were supported by invoices, expenditure was approved and VAT was appropriately accounted for.	YES
C The council assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.	YES
D The annual precept requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	YES
E Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	YES
F Petty cash payments were properly supported by receipts, expenditure was approved and VAT appropriately accounted for.	YES
G Salaries to employees and allowances to members were paid in accordance with council approvals, and PAYE and NI requirements were properly applied.	YES
H Asset and investments registers were complete and accurate and properly maintained.	YES
I Periodic and year-end bank account reconciliations were properly carried out.	YES
J Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments/income and expenditure), agreed with the cash book, were supported by an adequate audit trail from underlying records, and where appropriate debtors and creditors were properly recorded.	YES
K Trust funds (including charitable) The council has met its responsibilities as a trustee.	YES/NO/NA

For any other risk areas identified by the council (list any other risk areas below or on separate sheets if needed) adequate controls existed:

Name of person who carried out the internal audit H. Heelis (on behalf of Heelis & Lodge)

Signature of person who carried out the internal audit [Signature] Date 28/05/2010

*Note: If the response is 'no' please state the implications and action being taken to address any weakness in control identified (add separate sheets if needed).

**Note: If the response is 'not covered' please state when the most recent internal audit work was done in this area and when it is next planned, or, if coverage is not required, internal audit must explain why not (add separate sheets if needed).