Objection 2

Objection and relevant issues as advised by the External Auditor

The alleged failure of a member to leave the room during a conflicted agenda item about which they had already attempted to make a personal statement at the start of the meeting during the July 2023 meeting (Assertions 2 and 3)

- 1 You object to the failure of a member to leave the room during a conflicted agenda item about which they had already attempted to make a personal statement at the start of the meeting during the July 2023 meeting
- 2 Relevant issues: please provide a response to each instance referred to in the objector's original objection documentation that took place during the July meeting in 2023/24.
- 3 We will be expecting to see whether or not the Council accepts that there was non-compliance with standing orders (which require adherence to the Code of Conduct) and with the Localism Act 2011 (again re declaration of interests) and the evidence to support the Council's position.

Response

4 Ashwell Parish Council (APC) does not accept that there was non-compliance with APC's Standing Orders and the Localism Act 2011.

Supporting reasons and evidence: Standing Orders and Code of Conduct

- 5 As at July 2023 APC's Standing Orders <u>Click Link</u> and Code of Conduct <u>Click link</u> did not require withdrawal in the event of a non-pecuniary/other interest. The relevant paragraph in the Code of Conduct makes no mention of withdrawal but states:
 - "10. Where a matter arises at a meeting which relates to an interest the member shall not participate in a discussion or vote on the matter. He/she only has to declare what his/her interest is if it is not already entered in the member's register of interests or if he/she has not notified the Monitoring Officer of it." [APC Code of Conduct as at July 2023, Click Link]
- The APC Standing Orders, as a matter of long-standing policy, have followed the National Association of Local Councils model Standing Orders. The paragraph in APC's Orders relating to withdrawal is 13.c:
 - "13.c Unless he has been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which he has another interest **if so required by the Council's code of conduct**. He may return to the meeting after it has considered the matter in which he had the interest." [Click link to APC Standing Orders as at July 2023]
- 7 While In July 2023 the Code of Conduct adopted at that time did not require a parish councillor with a non-pecuniary/other interest to leave the room, APC later agreed to follow an NHC Monitoring Office (MO) request made to parish councils under their jurisdiction. The request was that they all adopt the same Code of Conduct. APC agreed to this and adopted a modified

- Code in October 2023 [minute 74.5.3 04 October Council, <u>Click link</u>]. This did then require parish councillors with a non-pecuniary/other interest to leave the room unless a dispensation had been granted.
- 8 The October 2023 change was consistent with the option granted by the Localism Act 2011, s27(3)(a) and (b), which enables a parish council to adopt the code adopted by its principal authority if it wishes.

Responses to each instance referred to in the original objection in relation to the 5 July 2023 meeting

9 Extracts outlined in red are from the objections to the Auditor in the objector's email dated 05 August 2024. Please note that, for a given item, agenda and minute numbers may not necessarily be the same.

Re: allegation on page 4 (see screen snip below)

In one meeting, the Chair was given firm advice by the presiding Deputy Clerk, that they must declare an interest in a discussion about complaints and withdraw from the debate. The Chair did not do so, instead choosing to make a personal statement about what a wast of time complaints were. Eventually, after further interventions by the Deputy Clerk, and then Councillor (Chair finally stopped his "personal statement".

- 10 The Chair did declare an interest in relation to agenda (Click Link) items 35.2 (Governance concerns) and 43.3 (Housing Needs Survey) and did withdraw from the meeting for item 35.2, as did Cllr XXXX. [minutes 32 and 34.2.2, 05 July 2023 Click Link]
- 11 Although Cllr XXXX had a non-pecuniary/other interest, para. 12 of the APC Code of Conduct allowed him to speak: "Where a matter arises at a meeting which relates to an interest he/she may speak on the matter only if members of the public are also allowed to speak at the meeting." [Click link to APC Code of Conduct as at July 2023]
- 12 The Governance matters in item 35.2 were considered during the open session where members of the public had the opportunity to speak and did so; there were no resolutions made.
- 13 Although the APC Code of Conduct and Standing Orders did not require Cllrs XXXX and XXXX to withdraw (contrary to the opinion of the then Deputy Clerk), they did this as a goodwill gesture to acknowledge that APC was minded to change the Code and because, given comments made in this and earlier meetings, it would be helpful to do so.
- 14 Agenda item 43.3 was not taken because the meeting had run for almost three hours and therefore it was deferred. [minute 42.3, 5 July 2023, Click link]

Re allegation on page 4 (see screen snip below)

Interestingly, the last item on the agenda of that same meeting was_to confirm the then Deputy Clerk as the new permanent Clerk. When it came to that item, the Chair simply refused to take it.

15 There was no refusal to take the item; it was deferred. This was for the same reason that agenda item 43.3 was deferred: the meeting had already run for almost 3 hours. [minute 42.5, 5 July 2023, Click link]

Re allegation on page 4 (see screen snip below)

During the course of the consideration of the complaint, the Chair decided he would provide updates to the Parish Council, claiming on every occasion, there had been no mischief. On at least one occasion, there was a behind closed doors discussion on this matter. (As you will know, if a Parish Council is to undertake business, it must give notice of a meeting; publish an agenda etc.)

16 It is unclear:

- On what occasions the objector claims the Chair said there had been no mischief
- What the objector means by "mischief"?
- When and where there was a "closed doors" discussion on the matter, and who was involved?

It is also unclear whether the remark about "consideration of the complaint" relates to Objection 2 or another objection that was deemed ineligible.

- 17 Therefore it is difficult to address this part of the objection.
- 18 However, on the assumption that this allegation refers to matters deferred from the meeting of 05 July 2023, there was an extraordinary meeting held on 26 July 2023. It was convened in accordance with proper procedures to consider:
 - proposed terms of reference for HR committee and membership
 - banking/amendments to current arrangements
 - Parish councillor vacancy
 - Positions of Clerk and Deputy Clerk
 - Implications of unresolved complaints.
 - Councillors declared interests as required.
- 19 The public and press were excluded for the last two items because:
 - Discussion of staff matters is considered confidential, and
 - the MO had advised that complaints were a confidential matter. See below extract from the relevant minute [minute 6 third paragraph, Click link].
- 20 The minutes of this meeting record that:

"Cllrs XXXX and XXXX left the room and Cllr XXXX XXXX took the Chair for this item

Cllr XXXX X reported that he had taken advice from HAPTC as to how items 7 and 8 should be dealt with. HR and employment issues, i.e. item 7, should be dealt with in private. Re item 8 the HAPTC advice had been that it was a matter for a parish council to decide whether

exclusion of the press and public was appropriate or not. Advice from the NHC Monitoring Officer had been that complaints were a confidential matter." [minute item 6, Click link]

Re allegation on page 7(see screen snip below)

Below is the minute of NHDC's Standards Committee on 1st November 2023, confirming the complaint was upheld and sanctions were applied. You may care to note that these represent the maximum sanction that can be applied under complaints considered only by officers.

- 21 Whilst the comment above could be read as implying that the APC Code of Conduct had been breached, this is not a correct interpretation and the objector does not allege this in it.
- 22 It is not clear what the objector is objecting to or whether is relates to Objection 2. The objector's comment above is thought to refer to either to the complaint connected with views expressed by an APC working party on the conservation area (NHC ref. 30/2022) or the complaint about failure to withdraw during the meeting of July 2023 (NHC ref. 7/2023). There was an informal decision on the first and no decision on the latter because the objector/complainant did not proceed with it.
- 23 At this point it may be helpful to clarify the position regarding the resolution of complaints. There have been four complaints made to the MO about APC Councillors from 2022 until the present. There have been no findings that any Ashwell Parish Councillor has breached the Code of Conduct either in the year 2023-24 or any other year.
- 24 Please note: detailed findings made by the MO as 'assessment decisions' taken at Stage 3 of their Complaints Handling Procedure remain confidential. [Para 5.9 NHC Complaints Handling Procedure, Click link]
- 25 The table below shows extracts of the NHC Standards Committee meetings of 01 November 2023 and 23 October 2024, which took MO/Deputy Monitoring Officer(DMO) reports on all four complaints made about APC Councillors [See 01 Nov Click link, pages 10-11, and 23 Oct Click link, page 13].

Complaint about: Parish/ Town or District Councillor	Basic summary of complaint	Action NB Independent Person/ R Independent Person involved in all stages of these complaints
30/2022 complaint against Parish Councillors, initially sent in by the Parish Council (received by them from a member of the public)	Complaint regarding conflicts of interests, bias and failure to provide information/ documentation. Clarifications provided by complainant regarding complaint during process.	DMO Decision: Informal action: training and both attended training. One to apologise. Failure to provide apology, reviewed by other DMO under section 5.11 Complaints Handling Procedure. as Cllr indicated unaware of what element of the complaint apology related to. Clarification provided to Cllr. Decision on review apology to be issued (and now issued).

Complaint about: Parish/ Town or District Councillor	Basic summary of complaint	Action NB Independent Person/ R Independent Person involved in all stages of these complaints
4/2023 complaint against Parish Councillors by member of the public.	Alleged failure to declare a pecuniary interest at a Parish meeting regarding a community body.	DMO: Referred to Police under Protocol: Decision by Police not a Disclosable Pecuniary Interest (DPI), no further Police action, suggested guidance to be provided if it became a DPI. MO Review of complaint post that; complaint clarified by complainant. Decision: not upheld complaint against one Cllr, other minor apparent breach – failure to declare Other Disclosable Interest – no further action given training completed following 30/2022 complaint/ guidance already provided re interests, registers of interests updated.
7/2023 complaint against Parish Councillors by member of the public.	Clarification sought on the complaint. Clarifications summary: Amendments to Code of Conduct in meeting by Cllrs, to include 'automatic' dispensation amounted to interest, regarding other complaints (made by the complainant), which they could benefit from.	MO: Complainant indicated, in the context of the case/ subsequent developments, did not think anything would be served by proceeding with the complaint. Considered with R Independent Person, accepted this as a withdrawal. NB no finding on complaint. Council had (now) adopted North Herts version of Code with minor Parish amendments.
3/2024 Complaint against a Parish Councillor.	Alleged failure to provide information with an agenda and at the meeting.	MO: Referred for external assessment by Hoey Ainscough Associates. Decision: no further action, as no obvious breach of the Code, or relates to Council service, policy or decision.

- 26 Please note that the MO decisions reported to the Standards Committee were:
 - 30/2022: informal action
 - 4/2023: complaint not upheld against one Councillor, minor apparent breach with no further action regarding the other
 - 7/2023: complaint withdrawn
 - 3/2024: no further action
- 27 The NHC Complaints Handling Procedure explains the significance of 'no further action' and 'informal action' as follows: para 5.3.1, "In circumstances such as these it is important to reiterate that there has been no finding that the Code has been breached" and in para 5.3.2, "Where a

- complaint is dealt with informally, it is important to note that there has been no finding that the Code has been breached." [Click link]
- 28 Appendix 2 of the Complaints Handling Procedure provides further information about the nature of an informal resolution:
 - "An informal resolution is a more proportionate way of dealing with relatively minor allegations, one-off incidents, or underlying disagreements between individuals.
 - This could be an apology, training, supervised mediation, or a combination of these things.
 - It should be borne in mind however that dealing with a matter by informal resolution at the initial assessment stage is making no finding of fact as there has been no formal investigation, or finding by the Standards Sub-Committee and therefore this will be confidential, unless this is post investigation and the matter has been referred to the Standards Sub-Committee."
- 29 Therefore any action in relation to an informal/other resolution cannot be termed a 'sanction' because this form of resolution cannot find fault.

Objection 3

Objection and relevant issues as advised by the External Auditor

The Council's alleged failure to consider the outcome of a code of conduct complaint against the Chair of the Council during the year, asserting that section 28(11) of the Localism Act has been breached by the Council (Assertion 3)

- 30 You object to the Council's failure to consider the outcome of an upheld code of conduct complaint against the Chair of the Council during the year, you assert that Section 28(11) of the Localism Act 2011 has been breached by the Council (Assertion 3).
- 31 Relevant Issues: This is more straightforward, I can see that the district council upheld code of conduct complaints against 2 councillors during the year and so the Council should have responded 'No' to Assertion 3 as a result of the failure to comply with s28 of the Localism Act 2011 as advised by NHC.

Ashwell Parish Council's Response

32 None of Ashwell Parish Council's (APC's) Councillors has been found to be in breach of its Code of Conduct. Therefore s28(11) of the Localism Act 2011 does not apply.

Supporting reasons and evidence

- 33 The relevant section of the Localism Act 2011 is subsection 28(11) [Click link]:
 - "(11) If a relevant authority finds that a member or co-opted member of the authority has failed to comply with its code of conduct (whether or not the finding is made following an investigation under arrangements put in place under subsection (6)) it may have regard to the failure in deciding—
 - (a) whether to take action in relation to the member or co-opted member, and
 - (b) what action to take."
- 34 There have been four complaints made to the NHC monitoring officer MO) about APC Councillors from 2022 until the present. There has been no finding that any Ashwell Parish Councillor has breached the APC Code of Conduct either in the year 2023-24 or any other year.
- 35 Please note: detailed findings made by the MO as 'assessment decisions' taken at Stage 3 of the NHC Complaints Handling Procedure remain confidential according to para 5.9 [Click link]:
 - "When the Monitoring Officer has taken a decision, they will inform the complainant and the Councillor (and in cases involving a Parish/ Town or Community Councillor) the Clerk (or Chairman as may be appropriate) of the decision and the reasons for that decision. These will remain confidential."

The NHC Monitoring Officer sent APC an email dated December 2023 confirming there was no breach requiring referral to the Standards Committee.

APC are unable to provide a link to this email as it is marked as follows:

"This email relates to a confidential local authority matter. It is intended for the recipient(s) concerned. This should not be disclosed to a third party without the permission of the Monitoring Officer or Deputy Monitoring Officer".

APC have approached the MO for permission to use the email but to-date have received no response.

36 The table below shows extracts of the NHC Standards Committee meeting of 01 November 2023 and 23 October 2024, which took MO/Deputy Monitoring Officer (DMO) reports on all four complaints made about APC Councillors [See 01 Nov Click link, pages 10-11, and 23 Oct Click link, page 13].

Complaint about: Parish/ Town or District Councillor	Basic summary of complaint	Action NB Independent Person/ R Independent Person involved in all stages of these complaints
30/2022 complaint against Parish Councillors, initially sent in by the Parish Council (received by them from a member of the public)	Complaint regarding conflicts of interests, bias and failure to provide information/ documentation. Clarifications provided by complainant regarding complaint during process.	DMO Decision: Informal action: training and both attended training. One to apologise. Failure to provide apology, reviewed by other DMO under section 5.11 Complaints Handling Procedure. as ClIr indicated unaware of what element of the complaint apology related to. Clarification provided to ClIr. Decision on review apology to be issued (and now issued).
4/2023 complaint against Parish Councillors by member of the public.	Alleged failure to declare a pecuniary interest at a Parish meeting regarding a community body.	DMO: Referred to Police under Protocol: Decision by Police not a Disclosable Pecuniary Interest (DPI), no further Police action, suggested guidance to be provided if it became a DPI. MO Review of complaint post that; complaint clarified by complainant. Decision: not upheld complaint against one Cllr, other minor apparent breach – failure to declare Other Disclosable Interest – no further action given training completed following 30/2022 complaint/ guidance already provided re interests, registers of interests updated.
7/2023 complaint against Parish Councillors by member of the public.	Clarification sought on the complaint. Clarifications summary: Amendments to Code of Conduct in meeting by Cllrs, to include 'automatic' dispensation amounted to interest, regarding other complaints (made by the complainant), which they could benefit from.	MO: Complainant indicated, in the context of the case/ subsequent developments, did not think anything would be served by proceeding with the complaint. Considered with R Independent Person, accepted this as a withdrawal. NB no finding on complaint. Council had (now) adopted North Herts

Complaint about: Parish/ Town or District Councillor	Basic summary of complaint	Action NB Independent Person/ R Independent Person involved in all stages of these complaints
		version of Code with minor Parish amendments.
3/2024 Complaint against a Parish Councillor	Alleged failure to provide information with an agenda and at the meeting.	MO: Referred for external assessment by Hoey Ainscough Associates. Decision: no further action, as no obvious breach of the Code, or relates to Council service, policy or decision

- 37 Please note that the MO decisions reported to the Standards Committee were:
 - 30/2022: informal action
 - 4/2023: complaint not upheld against one Councillor, minor apparent breach with no further action regarding the other
 - 7/2023: complaint withdrawn
 - 3/2024: no further action
- 38 In paragraphs 5.3.1 and 5.3.2 the NHC Complaints Handling Procedure explains the significance of 'no further action' and 'informal action' as follows [Click link]:
 - "In circumstances such as these it is important to reiterate that there has been no finding that the Code has been breached."
- 39 Appendix 2 of the Complaints Handling Procedure provides more information about the nature of an informal resolution:

"An informal resolution is a more proportionate way of dealing with relatively minor allegations, one-off incidents, or underlying disagreements between individuals.

This could be an apology, training, supervised mediation, or a combination of these things.

It should be borne in mind however that dealing with a matter by informal resolution at the initial assessment stage is making no finding of fact as there has been no formal investigation, or finding by the Standards Sub-Committee and therefore this will be confidential, unless this is post investigation and the matter has been referred to the Standards Sub-Committee."

Objection 4

Objection and relevant issues as advised by the External Auditor

The alleged failure of members to declare interests during the year in relation to payments made to the Community Land Trust Network (Assertions 2 and 3, Box 6)

40 You object to the failure of members to declare interests during the year in relation to payments made to the Community Land Trust Network.

Ashwell Parish Council's Response

- 41 The objection and all its details have already been the subject of a complaint to the NHC Monitoring Officer (MO) who gave a decision on 29 September 2023 (Reported to the Standards Committee on 1 November 2023, page 10) [Click link]
- 42 There has been no finding of a breach of the Code of Conduct in relation the complaint which this objection mirrors (nor has there been a finding of breach in respect of any other complaint).

The NHC Monitoring Officer sent APC an email dated December 2023 confirming there was no breach requiring referral to the Standards Committee.

APC are unable to provide a link to this email as it is marked as follows:

"This email relates to a confidential local authority matter. It is intended for the recipient(s) concerned. This should not be disclosed to a third party without the permission of the Monitoring Officer or Deputy Monitoring Officer".

APC have approached the MO for permission to use the email but to-date have received no response.

- 43 It was an informal decision that did not uphold the complaint against one Councillor while for the other the view was, "minor apparent breach failure to declare Other Disclosable Interest no further action" [NHC Standards Committee, 1 November 2023, see above]. This report did not amount to a finding of Code of Conduct breach. The NHC Complaints Handling Procedure explains the significance of 'no further action' in the last sentence of para 5.3.1, "In circumstances such as these it is important to reiterate that there has been no finding that the Code has been breached." [Click link]
- 44 The Councillors involved accepted the decision, took recommendations and worked with the MO to avoid possible confusion and/or misunderstanding in the future.
- 45 APC considers that:
 - Assertions 2 and 3 of the 2023-24 AGAR were correct for reasons given in paras. 58-59 below
 - The sums involved do not have a significant financial effect on the ability of this authority to conduct its business or manage its finances.

Supporting reasons and evidence

Background

- 46 The Ashwell Community Land Trust (CLT) is a Community Benefit Society (CBS) set up by virtue of the Co-operative and Community Benefit Societies Act 2014. It may only act for the benefit of the community and not of its members. A CBS must be established with a social or environmental objective and has a non-profit constitution [CLT information, Click link]. CLT rules, Click link].
- 47 At Ashwell Parish Council's (APC's) 07 December 2022 Council meeting, agenda item 63.2 [Click link] asked Councillors:

"To consider the proposal from the founder members/directors of the Ashwell CLT Ltd that the Parish Council continue to fund the costs for the time being to include, (i) administration, (ii) room hire, (iii) annual membership of the CLT Network (£75), (iv) Directors' liability insurance (£200)."

The Council approved the proposal, minute 63.2. [APC minutes, 07 December 2022, [Click link]

- 48 At the time there was some uncertainty over the whether or not the CLT was truly active. The CLT had not then been launched to parishioners nor had it recruited anyone other than the Directors as shareholders. It had no bank account and no assets. However, it had been registered with the FCA on 24th October 2022 with the APC Chair and Vice-Chair as Directors. In September 2023 the NHC Monitoring Office clarified the question in a decision following a parishioner complaint: the date when directors were appointed was when the interest arose.
- 49 However, in December 2022 there was a degree of uncertainty over whether the Chair and Vice-Chair had an interest and should declare it.
- 50 Looking at the parishioner complaint in some detail helps understanding of the situation. The initial allegation was that the Chair and Vice-Chair failed to declare a pecuniary interest at the December 2022 meeting, which considered making a financial grant to an organisation of which they are both directors. This complaint (ref: 4/2023) was referred to the Police in accordance with paragraph 5.12 of NHC's adopted Complaints Handling Procedure [Click link]. The Police concluded that the Directorship or shareholding in the Community Land Trust did **not** amount to a Disclosable Pecuniary Interest (DPI).
- 51 Subsequently the parishioner modified the complaint by stating that Directorship of the CLT, although not a 'Disclosable Pecuniary Interest', was an 'Other Disclosable Interest'. The parishioner also stated that an 'Other Disclosable Interest' was not registered within the required 28 day period. In fact, 'Other Disclosable Interests' in the CLT were not registered until May 2023. However, the exact point at which the interest came into being had still not been established at that stage.
- The MO made a decision on the full complaint, including the modification in September 2023.

 This confirmed that there was an 'Other Disclosable Interest' at the time of the December 2022 meeting. After reviewing the video of the meeting in order to establish whether either of the Councillors had or had not declared an interest, debated or voted the MO decided as follows:

- "not upheld complaint against one Cllr, other minor apparent breach failure to declare Other Disclosable Interest no further action." [Complaint 4/2023 NHC Standards Committee, 1 November 2023, [Click link, page 10]
- 53 The Deputy Monitoring Officer (DMO) reported Police and MO decisions to the NHC Standards Committee on 01 November 2023 as follows:

Complaint about: Parish/ Town or District Councillor	Basic summary of complaint	Action NB Independent Person/ R Independent Person involved in all stages of these complaints
4/2023 complaint against Parish Councillors by member of the public.	Alleged failure to declare a pecuniary interest at a Parish meeting regarding a community body.	DMO: Referred to Police under Protocol: Decision by Police not a Disclosable Pecuniary Interest (DPI), no further Police action, suggested guidance to be provided if it became a DPI. MO Review of complaint post that; complaint clarified by complainant. Decision: not upheld complaint against one Cllr, other minor apparent breach – failure to declare Other Disclosable Interest – no further action given training completed following 30/2022 complaint/ guidance already provided re interests, registers of interests updated.

- 54 The NHC Complaints Handling Procedure explains the significance of 'no further action' as follows: para 5.3.1, "In circumstances such as these it is important to reiterate that there has been no finding that the Code has been breached." [Click link]
- 55 The report in the 'Action' column shows that the complaint covered all the matters raised in Objection 4, and how these were resolved. These matters later became the subject of Objection 4.

Considerations

- 56 Ashwell Parish Council would like the points below to be taken into consideration.
- 57 After receiving comment from the MO, Councillors are now aware of what is expected and what to do. All matters in the objection have already been dealt with by the MO and resolved informally with no breach of the Code of Conduct involved.
- The item forming the basis of the objection was approved in the 07 December 2022 meeting, outside the period of the 2023-24 AGAR. The sums mentioned were for future payment of directors' liability insurance (£200), membership of the CLT network (£75) and administrative expenses.

59 In 2023-24 APC did cover CLT Expenses of £105.40. The Auditor has asked for details of payment approvals and actual payments made to the CLT in 2023-24. They are:

£85.00 for the renewal of membership of the CLT Network. The agreement for the Parish Council to continue funding the set-up costs of the CLT, including the renewal of the CLT network membership, had already been made in the 07 December 2022 meeting (minute 63.2, [Click link]. This was a valid agenda item decision. According to the Localism Act 2011 S28 (4) ... "a decision is not invalidated just because something that occurred in the process of making the decision involved a failure to comply with the code", (Click link). This approval was well below even that bar because it was not associated with any failure to comply.

The invoice was paid in April 2023 by the Accounts Clerk as agreed at the December 2022 Council Meeting. The payment was included in the summary of payments presented to the 17 May 2023 Council Meeting [minutes Appendix B, Click link] and approved as a true record. No declarations of interests were made, or needed, in relation to the summary presented to this meeting, because no new proposals for payments were made.

 £20.40 for room hire. A proposal for payment for room hire was made to the 06 March 2024 Council Meeting, [minute 121.2, <u>Click link</u>]. Cllrs XXXX and XXXX, in accordance with the Code adopted since October 2023, left the room.

The payment was included in the summary of payments presented to the 03 April 2024 meeting [minutes Appendix, <u>Click link</u>] and approved as a true record. No declarations of interests were made, or needed, in relation to the Accounts Summary presented to the meeting, because no new proposals for payments were made.

 Please note that no payment has ever been made to the CLT for directors' liability insurance to date.