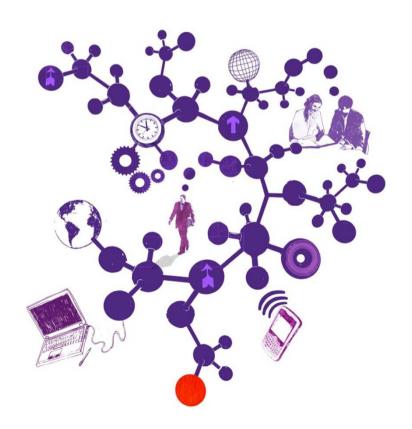


Review of South Hams District Council and West Devon Borough Council's Outline Business Plan for Transformation

October 2013



Background and approach

Background

South Hams District Council and West Devon Borough Council are planning to move towards a new target operating model across both Councils through a 30 month transformation programme, named Transformation Programme 2018 (T18). At this stage a high level business case has been prepared by the senior management team across both Councils. This has set out to test whether this programme makes sufficient contribution to overall savings targets required by the councils to be taken to the next stage.

The T18 programme represents a fundamental change of working for the councils. The key principles are centred around a significant change to the customer contact model:

- managing and reducing customer demand; and
- channelling as much customer contact as possible using the web/mobile technology

This will require a significant investment in ICT for the Councils in order for the savings to be realised. Notwithstanding this cost, the senior management team anticipate that savings will be generated through this change to working in relation to customer contact.

Also, as the majority of the Councils' costs relate to staffing, savings will be achieved through a headcount reduction arising from the implementation of this model.

The management team now would like to gain independent challenge on the high level business case and has selected three independent parties, including Grant Thornton, to perform this role. This will assist them in determining next steps in relation to the programme.

Approach

Our work has comprised the following:

Review of the high level business case

We have reviewed the high level business case dated 29 August 2013 v 2.03 to assess its general fitness for purpose and identify areas that the Councils should focus on. We have drawn on our experience of the local government sector and have referred to best practice in order to identify areas worthy of further consideration. Arising from this, we developed a list of questions to challenge the management team and assist them in ensuring that the documentation developed is sufficiently robust.

Attendance at the challenge event

We attended a challenge event which was held on Monday 14 and Tuesday 15 October 2013. This comprised of a series of interviews with the senior management team and various stakeholder groups. We also held meetings individually with the Section 151 Officer. The aim of this event was to seek assurance at this stage that the business case is fit for purpose and that no key areas has been overlooked.

Report

We were asked to comment specifically on the following areas following the above two stages:

- the assumptions made regarding the allocation of costs and savings between the two councils
- the governance structure for the T18 programme
- alternative approaches to addressing the funding gap that the councils may wish to consider if the T18 programme is not progressed, based on our local government client base

This report addresses the above points.

High level business case

Background

The Councils' approach to making savings is predicated on the success of the T18 programme. There are different approaches to meeting budget gaps being implemented throughout the public sector. This approach is a corporate, long term, comprehensive savings programme across both Councils based on a different model of working i.e. more efficient interaction with customers through investment in IT and staff efficiencies. It has strong advantages over shorter-term approaches. It is more sustainable in the long term, provides a clear vision for all stakeholders: local residents, businesses, members and officers. It allows better planning of resources, in particular staffing and accommodation resource which is particularly important for South Hams and West Devon as two Councils wanting to work more closely together to realise greater benefits. Corporate, strategic efficiency reviews have been proven to be more effective in cost reduction than the traditional annual 'salami slicing' approach i.e. by marginal cost reductions through cutting services or headcount in response to funding cuts.

The programme approach is based on the Councils' officers working closely together with aligned goals. We have seen strong evidence that part of the work completed to date includes communications and involvement with officers across the two councils to explain the proposed project and the implications for individuals as well as the councils as a whole. It will be important to maintain this momentum as the project progresses. We have seen that one of the four workstreams is 'people' which should provide that dedicated focus.

Meeting the financial challenges

The budget gap over the next four years to 2017/18 combined for both Councils is £4.7m. The annual financial savings indicated in the high level business case (dated 29th August 2013) is £3.5m. The financial costs are estimated at £4.7 million, allowing a payback period of just over two years. The savings and costs have since been refined to show financial costs of £4.85 million and savings of £3.8million, still delivering a payback period just over two years. If the programme delivers according to the forecast, it is clear that the programme will at least deliver the savings required for both Councils, (when taken in conjunction with other savings already identified). The Councils have performed sensitivity analysis to establish the worse case scenario and the effect that this has on the payback period.

It is very important therefore to ensure that anything likely to impact on these forecasts is monitored carefully. The Councils have indicated in their timeline for the Programme the need to monitor costs and extent of benefit realisation. This will include the ongoing testing of initial assumptions including the effect on the sensitivity analysis. We have seen that programme risks have been documented and their impact and mitigations articulated. These will need to be monitored carefully to identify at the earliest opportunity any factor that may cause the forecast data to become inaccurate and impact on the savings calculated.

The basis for savings is through:

- headcount reduction (see page 3): and
- managing customer contact through reduced demand and more efficient contact through the significant IT investment

We understand that the project team has carried out market analysis regarding customer contact channel shift (from face to face to IT based contact) on which savings are predicated. However, we understand that the analysis is not specific to this region. In our experience, channel shift is often more challenging for councils than expected. We suggest that the project team continues to analyse the potential and barriers to channel shift, for example by assessing take-up of existing online local council services.

The payback period of two years for the IT investment seems short compared to other projects that we have seen being implemented (with the average tending to be between three and five years). To validate the accuracy of this forecast, the following should be reviewed:

- installation and running costs there may be unexpected costs of ownership
- maintenance and support costs these are normally a significant part of the cost
- running costs including internal staff costs related to these

We have seen that detailed calculations have been made in relation to all of the above. To provide a sense check for these figures, a site visit to another organisation that has implemented a similar system could provide insight into costs that may only be uncovered at later stages. We are aware that the project team have carried out site visits to other councils and are maintaining links with them. The Councils should ensure that particular attention is paid to the above key costs when referencing other sites.

High level business case

Use of reserves

The T18 programme forecasts depend on a call on both Councils' reserves. For South Hams, it is proposed to use £700,000 of the current balance on un-earmarked revenue reserves, leaving a balance of £1.8m. As South Hams' net budget is £9.3m, this remainder amount is within the 10% of the net budget and as such within the terms of the Council's financial strategy. In West Devon, the Council proposes to use £200,000 of the current un-earmarked reserves of £1.03m (leaving a balance of £830,000). Again this would be within the 10% of net budget parameter. However, the minimum level of un-earmarked reserves for West Devon is £750,000 which would mean that the level would not be significantly above the minimum which represents a risk, particularly if some element of cost is higher than expected.

The management team should also consider the level of reserves in comparison to other comparable councils, as well as in relation to the levels set within their own financial strategies, when deciding whether to use this proportion of reserves. South Hams' level of un-earmarked reserves to gross revenue expenditure did not change significantly from 2011-12 to 2012-13 and was average in terms of reserve levels at 0.28 of gross revenue expenditure (i.e. when looking at other authorities in the Audit Commission's statistical nearest neighbour benchmark group). However, the Audit Commission tools show that West Devon's level of un-earmarked reserves as a percentage of gross revenue expenditure was low in comparison to other councils at the end of 2011-12 with a ratio of 0.08 whereas the overall average for districts was 0.24 and 0.26 for the nearest neighbour group. This presents a higher risk for West Devon which needs to be considered carefully.

The Head of Finance and Audit is aware of the risk and has stated that it is anticipated that West Devon will have an underspend in the 2013-2014 Accounts of between £75,000 to £100,000, which would mean that the level of Unearmarked Reserves would rise to between £905,000 to £930,000. In addition, she has pointed out that the ratio analysis undertaken by the Audit Commission for West Devon looks low in comparison to other councils as the Council has a very minimal capital programme and low asset base (as the ratio calculates the level of available capital resources which the Council has as well as the level of Unearmarked and Earmarked Reserves).

We are also aware that West Devon receives a very high level of annual New Homes Bonus in comparison to other neighbouring councils which it could use for the T18 project if the costs were to increase beyond estimates. However, this money is not absolutely guaranteed and therefore cannot be relied upon entirely.

Staff costs

Redundancy costs

The redundancy costs of £1,388,795 which represents the loss of 97 staff has been calculated using the following assumptions:

- redundancy will take place as per the timetable
- redundancy costs for all staff have been calculated and a mean average has been used
- vacant posts included
- average redundancy cost is £14,137

Although these are valid assumptions, sensitivity analysis provides the full potential cost implication. If costs were to increase to the upper quartile of say an average of £20,000 per employee, this has the effect of increasing the investment costs by £570,000 and increases the forecast payback period to two and a half years.

Pension strain

The pension strain has been calculated at £518,044 using the following assumptions:

- a mean average strain cost was calculated
- it was calculated that 28% of current staff will be over 55, and
- 83% of staff will be in the pension scheme
- calculation is average cost multiplied by probability that the redundant person is over 55 and in the pension scheme

However, the cost may increase depending on how many older/longer serving staff are made redundant but conversely the costs may reduce if the vacant posts are not filled.

Financial data

Ratios

Investment costs relating directly to staff numbers

The ratio for calculating the split of investment costs between SHDC and WDBC in respect of the following staff costs is 64% for SHDC and 36% for WDBC:

- workstation costs
- infrastructure
- redundancy
- pension strain
- training

This ratio is calculated based on the level of staff for each Council, removing the 'not in scope' items and making the appropriate adjustment for staff that complete work for both Councils. This calculation seems reasonable based on comparisons to others we have seen in the local government sector where a number of councils are making a joint investment.

Investment costs in relation to software and ICT implementation

A ratio of 50:50 for each council has been used for the following costs:

- software
- implementation and workstream development
- implementation of future model

We understand that the rationale for this is to reflect the individual cost to a District Council of implementing the new operating model. Regardless of the relative size of each Council, the same level of implementation effort is required. To support the management's recommendation, Members should give consideration to the following questions:

- is the benefit received by each Council equal?
- are the same facilities being provided to each Council?
- is the outcome the same for each Council?
- what is the level of materiality to each Council?

South Hams District Council				
Description	Value £	50% ratio £	64% ratio £	Difference f
ICT Costs	680,000	340,000	435,200	95,200
Implementation and Workstream Development	730,000	365,000	467,200	102,200
Implementation of future model	350,000	175,000	224,000	49,000
If using 64% ratio SHDC would pay more				246,400
West Devon Borough Council				
Description	Value	50% ratio	36% ratio	Difference
ICT Costs	680,000	340,000	244,800	- 95,200
Implementation and Workstream Development	730,000	365,000	262,800	- 102,200
Implementation of future model	350,000	175,000	126,000	- 49,000
If using 36% ratio WDBC would pay less				- 246,400

Cost difference

The table above (extracted from the high level business case) shows the difference in costs should 64:36 ratio be used for splitting both the software and implementation costs (as opposed to 50:50). Using this ratio SHDC would pay £246,400 more and WDBC £246,400 less than the current officer recommendation shown in the Councils' reports on T18.

Alternatively, if just the ICT costs were split 50%/50% and the Implementation costs were retained at 64%/36%, SHDC would pay £95,200 more and WDBC £95,200 less. In our experience, councils do not place great significance on the exact sharing of costs, even in cases such as this, where the individual councils are not of equal size. It is worth considering the outcomes for each council and the level of materiality in relation to the size of the project to determine the importance of the chosen allocation in relation to the overall project.

Accommodation

If two office bases are retained, there is an estimated loss of programmed efficiency savings (agile and remodelling) of between £400,000 and £500,000 as identified in Section 4.5 of the Council reports on T18.

Governance arrangements

General governance

We have reviewed the governance structure provided in the documentation. This outline structure follows the recognised standard good practice structure, comprising:

- Steering Group
- Project Board
- Programme areas

Each have documented terms of reference, ensuring clear aims and accountability. Meetings held twice monthly is usual for this stage of a project's development. A typical structure would also include the project team/office which reports into the Project Board (which we understand is in place – this is the Programme Board made up of the Senior Management Team), as well as a quality manager/team.

The Councils should ensure that there is a clear ownership of the project, by having a clearly identified transformational lead officer and a member with specific responsibility for transformation, so that both officer and member responsibility and ownership is defined and communicated.

We note that there is no defined project team in place at the moment, although the Councils have a shared Business Development team who are undertaking a large part of the work. We understand that those involved in the project are officers who perform their roles in addition to their substantive roles. As the project progresses, the management team may need to include some dedicated full time resource to it.

Board composition

Governance good practice does not stipulate that board membership across the two Councils should be split evenly, or in any specific way. The key factor is to ensure that the individuals representing each council are suitably trained, have sufficient experience to discharge their duties as effectively as possible and are able to represent their council to achieve the overall ambitions of the joint project.

The size of the board and steering group may be determined depending on the specific needs of the project. Larger groups are preferred in some cases where diversity of input is required in relation to strategy and development, which may only be achieved through a wider group. Smaller groups are preferred where the strategy is well defined and swift decision-making is of fundamental importance for the project's success. It also depends on the availability of suitable individuals for the roles. The senior management team of the councils must decide what the priorities are in relation to the project and the resource available to them.

Risks and issues

We have noted that within both Councils' Transformation Programme reports to both the Executive (SHDC) and the Resources Committee (WDBC): Progress to Date and Next Steps document dated 19th and 17th September 2013, there is an extract from the corporate risk register which follows the standard good practice format with responsibilities assigned. However, the councils should ensure that customer related risk factors are included, for example that broadband coverage is not sufficient, or that channel shift/digital inclusion is insufficient to achieve the planned savings. There is also a risk to the service level customers currently enjoy. We have seen the latest Key Performance Indicators for call answering, but future call response rates and other measures will need to be forecast. An action plan should also ideally be attached to the risk register so that mitigations are progressed.

We have not had sight of an overall risk strategy, issues strategy or quality management plan. The Council reports on T18 documented the Risk Matrices but these will need further work to develop into an overall risk strategy for the project with an action plan and clear deadlines for actions. Our understanding is that the Council will progress these further areas, once a Member decision has been reached on the T18 project. The management team should consider documenting these after the Member decision, to strengthen the project as these are key components of a robust governance framework, as the ability to manage risks impacts on the ability to achieve the desired level of savings.

Alternative approaches to addressing the funding gap

Alternative approaches

We are aware that the councils have considered various options in determining if there are any alternatives to T18. Other alternatives identified were to:

- generate significant increase in income/maximise other savings opportunities
- work with another shared service partner
- delegate delivery of services to another council
- outsourcing/separate company agreements
- stop delivering discretionary services
- reduce services of statutory activities

As mentioned at the outset, transformation programmes such as T18 provide greater opportunities for savings as the whole model of working is re-configured to meet the needs of the customer and cut out activity that does not add value or is performed by a more expensive resource. If such programmes are successful, they enable councils to focus on providing and improving the services their customers want, rather than having to face difficult decisions about service cuts and focus attention internally. The last two options listed above would not enable the councils to improve their efficiency and may create additional risks through reduced service provision.

Looking at increasing revenue opportunities is an area of efficiency that may be considered, as the councils are doing here, alongside the transformation programme. The extent of the potential market may not be sufficient to deliver the savings needed, they are subject to the fluctuations of demand in the market and there are political considerations which may mean that some income opportunities are not considered acceptable for example car parking charges. Therefore this cannot be relied on as a single approach to funding gaps.

If the T18 programme is not progressed, the councils may generate savings and more efficient working through widening the shared service network and either hosting or receiving services from others. We have discussed this with the Head of Finance and Audit who noted concerns about the long lead time for such projects and the time needed to build relationships with other councils. We understand that there is also a concern that savings from purely sharing services have largely already been achieved through the shared working of both Councils. However, in our experience, larger groups of councils are able to benefit from greater scale efficiencies through sharing back office services, revenues and benefits offices and other service areas such as leisure and community services.

Partnering with a private sector provider is another key route that many councils are taking in order to generate the levels of savings required by funding gaps. For example, there are many cases of Revenues and Benefits being outsourced in this way, in which council employees are transferred by TUPE to the provider organisation which can make substantial staff cost savings, particularly in relation to pension contributions. However, we are aware that West Devon's Revenues and Benefits service was previously outsourced and this was brought back in house and delivered via a shared service to achieve savings.

A number of councils have now become 'centres of excellence' in specific service areas and are acting as the outsource provider to others. This helps them increase revenue at the same time allowing others to benefit from their expertise and greater scale economies than usual shared service working not just with neighbouring councils but country-wide in some cases.

The following pages provide more detail and examples of these alternative approaches, drawn from our client base, for reference purposes.

Conclusion

Summary of key points

We have assessed the outline business plan for the T18 Transformation Programme to determine its fitness for purpose. The key points of our review are summarised below:

Meeting the financial challenges

The projected savings calculated for this project show that these will more than cover the budget gap over the next few years. Sensitivity analysis has been carried out to ensure that the worst case scenario has been assessed for impact.

We have assessed the assumptions made in the outline business case and comment on the staff costs below. In relation to customer contact savings, further local market analysis into likely channel shift and digital inclusion would strengthen the assumptions made.

Use of reserves

The project will require both Councils to use reserves towards its financing. This will result in reserves falling to a level lower than average for similar councils throughout England, although reserves are still forecast to remain within the Councils' own tolerance limits.

Staff costs

We have assessed the redundancy costs and pension strain calculations within the high level business case. The costs have been calculated using reasonable assumptions and again sensitivity analysis has been used to ascertain the worst case scenario and the impact that this would have on the overall savings targets.

Ratios

We were asked to comment on the allocation of costs between the two Councils in relation to the investment costs. Staff related costs have been split 64:36 between them, but costs relating to ICT implementation have been split 50:50. The allocation seems reasonable based on the assumptions used and our knowledge of similar projects elsewhere in the sector. It is worth considering the outcomes for each Council and the level of materiality in relation to the size of the project to determine the importance of the chosen allocation in relation to the overall project.

Governance

The governance structure currently in place is broadly in line with best practice. It could be strengthened by having a clearly identified transformational lead officer and a member with specific responsibility for transformation, so that both officer and member responsibility and ownership is defined and communicated. At later stages in the project, additional resource may be needed to strengthen these arrangements.

Board composition is a matter for the Councils to decide what suits their needs. The size and representation from each Council is less critical than having individuals who are suitable and trained for the role.

We have reviewed the risk documentation and suggest that a single risk register is created to enable proper management of risks as these will be critical to the project's success. We also suggest that additional consideration is given to the risks in relation to customer contact as these could impact significantly on the savings potential of the project.

Appendix

Alternative delivery models

Commissioning model and outsourcing delivery

A number of our clients are moving towards this model. This is fundamentally a different approach to how local services are provided. This system, whereby the council works with elected members, partners and residents to set the strategic priorities of the region in the context of the available resources, to agree a set of outcomes reflecting local needs and the full range of parties helps to achieve. Services are commissioned from a diverse range of providers and can be at different scales and run in different areas all at once. One of our clients has adopted this approach to underpin its transformation programme. It has partnered with a private sector outsource specialist for the delivery of two contracts. One covers New Support and Customer Services Organisation (NSCSO) and the other is Development and Regulatory Services (DRS). The council has a well-resourced procurement function and a commercial services manager who have worked to develop the contract so that the council derives the savings it requires and this increases incrementally throughout the lifetime of the contract. They created a Strategic Commissioning Board comprising the Chief Executive and three senior directors. This Board has overall responsibility for the management and leadership of the council, developing commissioning priorities and ensuring that local needs are met and that partner working is good. Overall performance rests here too.

The commissioning model requires fundamental questions to be asked about the future of local services during times of budget cuts. Is it necessary? What form will it take? How best to provide it? This model is all about who is best placed to deliver services in accordance with the priorities set by elected members. Internal and external delivery units are required for the new structure.

In our client's model, they have appointed six lead commissioners who cover collectively all areas. Their role is to translate the priorities set into commissioning strategies and delivery plans. They have also appointed an Assurance group to provide the important job of independent oversight and assurance to the board and members on governance and business practices. This group comprises six individuals drawn from finance and internal audit staff. The council chose this approach to allow flexibility and move away from the directorate silo approach, into a mixed economy. The senior management team was reshaped to enable:

- more leadership capacity to oversee new commercial relations
- delivery of service changes required by the Medium Term Financial Strategy
- support for the democratic decision making of the council

The council expects the NSCSO contract to deliver savings of £70m by the end of its 10-year life (18% of transferred budget) and £17m on DRS with an additional £9.8m of additional income to the council.

The income from the DRS contract includes planned growth of the Regeneration service with the aim of selling services increasingly to other councils/commissioners. There is also income from government initiatives like the New Homes Bonus.

Outsourcing: a further example

Our clients, three neighbouring district councils, have entered into a partnership with a private sector supplier for the delivery of their joint revenues and benefits service. These councils had already made savings through economies of scale since setting up their shared service partnership for revenues and benefits over a period of six years. This was during a period of increased workload. They had reached a point where they needed to make further savings without compromising service quality and felt that they could not achieve this without external support. The advent of Universal Credit meant that up to 40 full time posts were at risk of redundancy which may have increased if greater budget cuts were needed in future.

Their previous attempts to grow the partnership through a wider local government network had not been successful. Although they knew their service offering was strong and tradable, they recognised that they were not skilled in taking this to market. They decided to approach private sector providers with proven expertise in this field.

The business case is predicated on £3m savings across the three organisations over the five year lifetime of the contract. The council employees have been transferred via TUPE arrangements to the supplier, meaning that it now becomes responsible for their salary and on-costs including their pension arrangements which are based approximately on 19% employer contributions, making a significant saving. All former council staff will retain their Local Government pension scheme membership where relevant.

Key success factors

- know your requirements understand your own requirements and capabilities through assessment and prioritisation of risk
- evaluate your ability and appetite to work in a collaborative partnership
- do your research perform extensive due diligence as part of the vendor selection process. This should cover financial and operational performance, capability assessment, a key personnel audit and assessment of cultural and strategic fit
- define roles and responsibilities across the partnership
- clearly define roles and responsibilities across the parties for both operational delivery and overarching management of the relationship
- ensure defined roles are maintained or changes only made by mutual agreement
- take actions to ensure that accountabilities for operational matters are understood by both parties throughout

Shared services

The shared service model involves entering into a collaboration, usually with other councils and increasingly with other organisations in the public sector such as the police. Our clients typically have shared services across counties for service areas, in particular regulatory services where they most benefit from scale economies. Greater benefits are derived from wider shared service working i.e. across three or more organisations, to benefit from greater scale economies. For example, the seven councils within Worcestershire operate a shared service partnership across some services county-wide which has delivered significant savings.

Benefits

- there is greater control over process and outcomes which can lead to reduced risk, if your processes are sufficiently robust. This may be particularly relevant for key areas of service delivery
- cultural fit may be better among a group of public sector organisations
- greater flexibility due to not being tied into a fixed term contract

Risks

- the opportunity for scale economies without the backing of an experienced supplier with strong capacity may be reduced
- IT investment remains the responsibility of the council
- the risks of maintaining own processes may be higher than using an experienced outsource supplier

Key success factors

- all participants should have an established trust of one another, built up over a period of time
- there should be a clear vision, shared across all partners
- each individual partner's role should be known and understood by all
- there should be the ability for all to compromise where necessary, for example on goal alignment
- there should be flexibility concerning the contract terms as, over time, technology or partner needs may change and need to be incorporated

Trusts and social enterprises

The councils may wish to consider setting up an arm's length delivery vehicle, such as a trust, to run specific discretionary services. A number of our clients have created trusts, for various purposes. A common factor is the existence of an asset that the council finds expensive to maintain and does not have the capacity and/or expertise to run the venture as successfully as it would like. This asset is therefore transferred into the trust vehicle.

One of our clients has set up a trust to run its local theatre. A charitable trust company has been created. The objective was to seek additional funding streams as the traditional routes of funding were no longer as generous as in previous years. It also had the aim of exposing the Theatre to greater expertise from the worlds of art and commerce. The trust is non profit making and the building remains fully owned by the council. All surpluses made will be re-invested. It has retained a degree of control through having two seats on the board of the trust, alongside a number of individuals chosen for their relevant experience in this area. Staff of the theatre are now solely employed through the trust. It is too early to determine the savings levels achieved, but the council is now able to focus on other areas of service delivery and, apart from a fixed annual grant, has no other expenditure in relation to the theatre.

Similar considerations are followed for social enterprises. These are usually set up where there is trading of goods and services which may make a profit and be reinvested in the organisation. Some councils have used this approach to run their street markets, allowing local traders to run the operation, at arm's length from the council itself.

Benefits

- the council leaves the running of the trust to a third party and can focus on other service delivery
- the Trust is not bound by the council's strategic priorities allowing greater freedom
- due to its charitable status, there are tax advantages relating to the running of a trust
- trusts attract wider funding options such as lottery funding
- unlike a private company, surpluses can be reinvested

Risks

- it may not be politically acceptable for the council
- the trust is not directly accountable to members and residents due to its arm's length nature, so if closure decisions are made, the council has lost that control
- staff may be on less beneficial terms and conditions
- assets may be transferred to the detriment of the council
- tax exemptions may not survive the lifetime of the trust as legislation changes

Key success factors

- be clear about what the objective of the trust will be is it to make more money for the council? Or free up resource? Or both?
- articulate the goals and communicate to the wider stakeholder group so that there are no surprises
- understand the motives of the trust and how that aligns to the council's.
- understand the implications of bringing the function back in-house if required



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