

Table of Contents
Special Council Meeting

1. DECLARATION OF OPENING.....	2
2. DISCLAIMER	2
3. RECORD OF ATTENDANCE / APOLOGIES / APPROVED LEAVE OF ABSENCE.....	2
5. PUBLIC QUESTION TIME (<i>in relation to Item 6</i>).....	2
6. REPORTS	2
6.1 Consideration of Revoking Item 11.2 March 2007 Council Minutes	2
6.2 Response to Report of the Inquiry into the City of South Perth	5
7. CLOSURE	13



SPECIAL MEETING OF COUNCIL AGENDA

1. **DECLARATION OF OPENING**
2. **DISCLAIMER**
The Chairperson to read the City's Disclaimer
3. **RECORD OF ATTENDANCE / APOLOGIES / APPROVED LEAVE OF ABSENCE**
4. **DECLARATION OF INTEREST**
5. **PUBLIC QUESTION TIME** (*in relation to Item 6*)
6. **REPORTS**

6.1 Consideration of Revoking Item 11.2 March 2007 Council Minutes

Location:	City of South Perth
Applicant:	Council
File Ref:	GO/108
Date:	28 May 2007
Author:	Cliff Frewing, Chief Executive Officer

Summary

The purpose of this report is to consider revoking the Council decision at Item 11.2 of the March 2007 Council Meeting relating to a Notice of Motion lodged by Cr Smith but moved by Cr Best as Cr Smith declared a financial interest in the item and left the Chamber. The motion was as follows:

Item 11.2

That

- (a) *it has become apparent that in relation to the Inquiry presently being conducted by the Department of Local Government and Regional Development re a matter concerning the City of South Perth it is possible that an adverse finding can be made against any Councillor of the City of South Perth who gave evidence;*
- (b) *therefore, I move that any Councillor who wishes to engage a Lawyer to advise him or her of their legal position and act for them should have their legal expenses paid by the Council of the City of South Perth.*

CARRIED (7/5)

Background

At the April Council meeting (Item 11.1) and consistent with legal advice received on the unlawfulness of the resolution, Cr Ozsdolay submitted a Notice of Motion to rescind the resolution.

The resolution was expressed in the following terms:

That....

- (a) *that consideration be given to revoking Item 11.2 “Department of Local Government Inquiry - Legal Fees” insofar as it relates to the Minutes of the Council Meeting dated 27 March 2007 as follows:*

Item 11.2

That

- (a) *it has become apparent that in relation to the Inquiry presently being conducted by the Department of Local Government and Regional Development re a matter concerning the City of South Perth it is possible that an adverse finding can be made against any Councillor of the City of South Perth who gave evidence;*
- (b) *therefore, I move that any Councillor who wishes to engage a Lawyer to advise him or her of their legal position and act for them should have their legal expenses paid by the Council of the City of South Perth.*

**Note: Support of a Minimum of one third of the Members is Required*

- (b) *Item 11.2 insofar as it relates to the Minutes of the Council Minutes dated 27 March 2007 be revoked:*

** Note : An Absolute Majority is Required*

The legal advice previously obtained by the City concluded that the resolution passed by Council at its March meeting for the payment of legal expenses incurred by any councillor was unlawful because *inter alia* it imposed an indeterminate financial liability on the City that cannot be considered to be in the interests of, or for the good government, of the City. The advice recommended that the resolution should be revoked at the earliest opportunity.

It also advised that it is likely that because of the terms of the resolution, each councillor had a financial interest in the matter and should not have participated in the decision-making process without appropriate amendments to the resolution or an appropriate determination by the Minister under section 5.69 of the *Local Government Act*.

Subsequent to the receipt of that advice, the Department of Local Government has written to councillors seeking an explanation for their participation in the meeting which passed the resolution on the basis that they had failed to disclose an interest in the matter when it came before Council. The Department noted that any councillor would be entitled to receive a financial benefit in the form of payment of legal expenses not only those who may be the subject of “adverse” findings.

Comment

In view of the legal advice received, which is consistent with the Department’s concerns on the matter, Councillors Gleeson, Maddaford, Jamieson, Hearne, Macpherson, Ozsdolay, Cala, Wells, Doherty, Trent and Mayor Collins declared an interest in Item 11.1 on the April Council Agenda under section 5.65 of the Act. However because of the number of Declarations of Interest received would have left only Cr Best in the Chamber, it meant the meeting did not have a quorum and therefore the item could not be dealt with.

It was then left with the CEO to make application to the Minister under section 5.69 of the Act for a determination by the Minister allowing the Councillors who declared a financial interest, to participate in the debate to the extent and in accordance with whatever conditions the Minister determines to be appropriate.

In reply to the correspondence of the CEO, the Minister replied in a letter dated 21 May 2007, **Attachment 6.1**, and received by the CEO in the afternoon on the day of the May Ordinary Council meeting. The letter granted an exemption and allowed those Councillors who declared a financial interest (other than Cr Smith) to participate in discussion and decision making procedures relating to the rescission motion at the May 2007 Council meeting only.

This item of correspondence was introduced to the meeting as “New Business of an Urgent Nature”. The Minister’s exemption does not allow Councillor Best or Cr Smith to participate in the debate on this item. Cr Best is not exempted because he did not declare a financial interest and Cr Smith because he did declare an interest. The letter also stated that despite ‘approval’ that fresh declarations of interest are required to be made at the time this item is to be debated.

Following discussion at the May Council meeting as to whether to deal with the item of Late Business as tabled, Council did not deal with the matter because of its ‘late notice’ and it was agreed that the CEO would seek approval from the Department of Local Government for the matter be dealt with at the Special Council Meeting scheduled for 6 June 2007 or alternatively at the June Ordinary Council Meeting.

A letter was written to the Department in accordance with the terms of the debate requesting that the approval to debate the rescission motion be transferred from the Ordinary Council Meeting on 22 May 2007 to the Special Council Meeting on 6 June 2007. The Director General of the Department of Local Government, acting within delegated authority of the Minister, has agreed to this request on the same conditions that applied to the initial approval contained in the letter dated 21 May 2007.

The Council is now able to consider the rescission motion at the Special Council Meeting in accordance with the terms and conditions outlined in **Attachment 6.2**.

Consultation

Consultation has occurred with the Department of Local Government and Regional Development and correspondence written to the Minister for Local Government.

Policy and Legislative Implications

Minister’s approval sought in accordance with s.5.69 of the *Local Government Act*.

Financial Implications

Potentially unlimited at the present time if the original Motion is acted upon and unless the March 2007 Motion is rescinded.

Strategic Implications

The report and recommendations are consistent with the relevant Goal 5 - Organisational Effectiveness - City’s Strategic Plan: - *To be a professional, effective and efficient organisation.*

OFFICER RECOMMENDATION ITEM 6.1

That....

- (a) that consideration be given to revoking Item 11.2 "Department of Local Government Inquiry - Legal Fees" insofar as it relates to the Minutes of the Council Meeting dated 27 March 2007 as follows:

Item 11.2

That

- (a) *it has become apparent that in relation to the Inquiry presently being conducted by the Department of Local Government and Regional Development re a matter concerning the City of South Perth it is possible that an adverse finding can be made against any Councillor of the City of South Perth who gave evidence;*
- (b) *therefore, I move that any Councillor who wishes to engage a Lawyer to advise him or her of their legal position and act for them should have their legal expenses paid by the Council of the City of South Perth.*

***Note: Support of a Minimum of one third of the Members is Required**

- (b) Item 11.2 insofar as it relates to the Minutes of the Council Minutes dated 27 March 2007 be revoked:

*** Note : An Absolute Majority is Required**

Note: Only Mayor Collins and Councillors, Gleeson, Hearne, Macpherson, Jamieson, Ozsdolay, Cala, Wells, Maddaford, Doherty and Trent may participate in the debate and decision making process if a declaration of financial interest is made by each of those Elected Members.

6.2 Response to Report of the Inquiry into the City of South Perth

Location: City of South Perth
Applicant: Council
File Ref: A/LM/2
Date: 28 May 2007
Author: Cliff Frewing, Chief Executive Officer

Summary

The purpose of this Special Council meeting is to give early agreement to the Report Recommendations noting that the Council has until 16 July 2007 to finalise the details relating to each of the individual recommendations.

Upon receipt of the **Report of the Inquiry into the City of South Perth - May 2007** (the Report), the City is required to provide the Minister for Local Government with its written advice setting out the things that it has done or proposes to do to give effect to the recommendations of the Report.

Background

On 20 June 2006, the Director-General of the Department of Local Government and Regional Development authorised an Inquiry into the City of South Perth pursuant to section 8.3(2) of the *Local Government Act* (the Act) to inquire into and report on matters concerning the City.

The Terms of Reference for the inquiry were as follows:

- The process by which the City dealt with the issue of the demolition application and associated matters relating to the property at 27 The Esplanade, South Perth;
- The conduct of Councillors and Officers of the City in the application and processing of the demolition licence relating to the property at 27 The Esplanade;
- Subsequent Council deliberations on the matter, and
- Any other issue that is determined to be of relevance to the above.

Following completion of the inquiry, the Authorised Person prepared a report on the outcome of the inquiry which upon being tabled in State Parliament was forwarded to the City and subsequently made publicly available. A copy of the Report can be found on the Department's website and on the City's website.

The Report made 15 Findings and 7 Recommendations. This report to Council deals with an initial response to the 7 recommendations.

Powers and procedure

After receiving the Report, section 8.14(3) of the Act requires the local government to give the Minister written advice, within such time as the Minister allows, setting out the things that it has done or proposes to do to give effect to the recommendations of the Authorised Person.

S.8.14(3) of the Act specifies that :

Within 35 days after receiving the report or such longer period as the Minister allows, the local government is to give the Minister written advice setting out the things that it has done or proposes to do to give effect to the recommendations of the authorized person.

In accordance with this provision, the Minister by letter dated 17 May 2007 exercised her discretion and has allowed the City sixty (60) days (to 16 July) in which to respond to the Report Recommendations.

Pursuant to section 8.15(1) of the Act, after receiving the local government's advice, the Minister may order the local government or any of its Elected Members or employees to give effect to the recommendations in the report in a manner and within a time ordered by the Minister.

If the Minister's order is not complied with, the Minister may suspend the Council of the local government - see section 8.15(2) of the Act.

Comment

The report of the Inquiry into the City of South Perth 2006 contains 15 Findings and 7 Recommendations. It is proposed that Council respond to the Minister in a positive way to each of the recommendations to avoid the consequences detailed in S.8.15 of the Act detailed above.

REPORT RECOMMENDATIONS

It is clear that in any event, Council has already commenced its response in a positive way by adopting resolutions relating to the need for mediation (Recommendation 1) and audio recording of meetings (Recommendation 4).

To a large extent the commentary provided in this report is based on discussions held between the Mayor, Chief Executive Officer, Legal and Governance Officer of the City, and the Director General, Director Governance and Statutory and the Manager Compliance and Advice of the Department of Local Government and Regional Development.

The section of the report that follows identifies the Inquiry Report Recommendations, any Council or administration action that has occurred or is relevant and an officer recommendation.

R1. Council appoint a professional mediator to moderate the relationship conflicts between elected members and the Administration, and that:

- (a) The mediator be appointed from a list of suitable persons approved of by the Department of Local Government and Regional Development;**
- (b) The mediator report monthly to the Department of Local Government and Regional Development on an agreed basis; and**
- (c) The cost of the mediation be borne by the City of South Perth.**

In relation to recommendation 1(a) above, Council resolved at its Ordinary Meeting held on 22 May 2007 to compile a list of mediators drawn from LEADR, Institute of Arbitrators and Mediators Australia, WA Chapter (IAMA), and WALGA for inclusion in a list to be presented to the Department for its approval.

The specific Council resolution is as follows:

That.....

- (a) Council notes the limited time period of 60 days from 10 May 2007 which is available to the Council to satisfy the Department for Local Government and Regional Development that it is addressing the recommendations of the South Perth Inquiry Report; and**
- (b) in order to facilitate the mediation process contemplated in the Inquiry Report:**
 - (i) the Council compiles a list of two (2) mediators/facilitators from each of the following (to total 6 in all) by inviting :**
 - LEADR**
 - Institute of Arbitrators and Mediators Australia WA Chapter; and**
 - WALGA****to nominate individuals and to include appropriate information as to fees;**
 - (ii) the list to be presented to the Department for Local Government and Regional Development for its endorsement and adoption; and**
 - (iii) final selection of the agreed mediator/facilitator from the list of nominees to be carried out by the Council as soon as practicable.**

In accordance with the resolution the following has occurred:

- LEADR provided a list of 7 names. Each of these has been contacted and asked to provide a CV. At the time of writing the report 5 would like to be considered and 1 has declined.
- IAMA provided a list of 4 names. Each of these has been contacted and asked to provide a CV. At the time of writing the report 2 would like to be considered and none have declined.

- WALGA provided a list of 3 names. Each of these has been contacted and asked to provide a CV. At the time of writing the report I would like to be considered and none have declined.

A list of the names of all mediators the City has contacted to date is contained as **Confidential Attachment 6.2**. When responses have been received from all names provided by the three organisations, details will be provided to Council so that a 'short list' can be selected to comply with the May resolution. Alternatively, Council may wish to submit all names willing to be considered to the Department of Local Government and Regional Development for consideration to be included on the 'approved list'.

The Department of Local Government and Regional Development has also indicated that it has the names of suitable mediators worthy of consideration. The names have not yet been identified to the City and may include names already provided to the City.

Whether Council elects to submit all submissions received or the 6 referred to in the May resolution, the Director-General of the Department will provide a list of professional mediators who have been approved by and who are recommended by the Department for Council to make a selection.

Terms of Reference and a set of Agreed Outcomes will be developed in conjunction with the mediators prior to the commencement of the mediation process.

In relation to Recommendation 1(b), as this is a requirement set by the Minister on the appointed mediator, there is no role for the Council. It is however suggested that as part of the appointment, the mediator also report monthly to the City on the same basis.

In relation to Recommendation 1(c), it is difficult to accurately assess the likely costs involved as no mediator has yet been appointed and the timeframe of the appointment is also unknown. It is assumed that the appointed mediator could commence in August 2007 (ie within one month of the date that the response is required to be made).

The Department of Local Government and Regional Development has advised that the monitoring and need for mediation will continue past the October 2007 elections. On this basis, it is assumed that the mediator's services will be required for a period of at least 8 months to April 2008 .

Possible monthly involvement by the mediator could include attendance at Briefing/Concept Forums, Agenda Briefings and Council meetings. An initial one-on-one interview with either individuals and / or groups and the Department of Local Government and Regional Development would also appear likely. Monthly reporting is mandatory. It is suggested that a provisional sum of \$40,000 be allowed in the 2007/08 Budget for this purpose.

Officer Recommendation on Resolution R1

Council agrees to adopt Recommendation R1 and resolves to appoint a professional mediator to moderate the relationship conflicts between elected members and each other and between elected members and the Administration, in accordance with the terms of Recommendation R1.

R2. Council ensures that elected members undertake elected member training, provided by a training provider approved by the Department of Local Government and Regional Development, particularly in matters relating to:

- (a) The role and powers of the Chief Executive Officer and Administration; and**
- (b) The role of Council and Councillors.**

The Department advises that more than one training provider would likely be required to satisfy the terms of this report recommendation. For example, an experienced Mayor / President and/or Local Government CEO may be engaged in the first instance to provide advice on elected member / employee relationships. This advice would be supplemented with specific training for elected members to satisfy the terms of the report recommendation. The use of WALGA training modules is a possibility and information is currently being sought on possible training providers and availability.

A list of suitable names of training providers is currently being assembled for approval by the Department of Local Government and Regional Development.

Given the likely commencement of such an assignment would be August and that the 2007 Local Government elections are being held in October it is not considered appropriate to arrange a comprehensive training program during the remaining term of this Council. It is considered important however that Council does recognise the need for and benefit for some interim training on the role and powers of the Mayor, Deputy Mayor, Council, Councillors, Chief Executive Officer and administration.

It is therefore proposed that in the short intervening period between approval of the elected member training plan by the Department of Local Government and Regional Development and the October elections, either a current or past serving Mayor or President be engaged to conduct an interim training program. On election of the new Council in October 2007, a more comprehensive training program will be conducted for both existing and new elected members (if any). A proposed training plan will be developed for Council consideration so that it may be considered by Council as part of its final response to the Inquiry Report recommendations. Council can then give consideration to engaging the person(s) to provide induction workshops for existing and newly elected members coming on to Council on the subjects contained in this report recommendation after the October election.

The costs incurred by the training providers appointed will be borne by the City. A notional sum of \$40,000 will be provided for in the 2007/08 draft Budget for this purpose.

Officer Recommendation on Resolution R2

Council agrees to adopt Recommendation R2 and resolves to appoint training providers approved by the Department. The training providers will be required to report to Council monthly on the outcomes of the program of elected member training.

R3. *Elected members observe and comply with the City of South Perth Code of Conduct and the future new rules of conduct for elected members under the Local Government (Official Conduct) Amendment Act 2007.*

The commentary contained in the Inquiry Report at pages 4.7 / 4.8 in relation to this recommendation is simply as follows:

Elected Members have displayed an unacceptable attitude towards the City's Code of Conduct. This has perpetuated a climate of mistrust, a lack of respect for fellow members, and a lack of goodwill. This behaviour must cease if Council is to move forward from its problems.

The role of a Local Government Code of Conduct is detailed at 1.14 / 1.16 of the Inquiry Report and is obviously a very significant corporate document of the City. It applies to elected members and employees and must be taken seriously by all those persons to whom it applies.

The existing Code will be supplemented by mandatory provisions which will apply from the date of the October 2007 elections. Although these have not yet been finalised as they are in draft form, the provisions will prescribe high standards of behaviour and will be actionable in accordance with the Local Government official Conduct legislation recently passed by Parliament.

As a separate issue, a report on this topic is being prepared for consideration at the June Ordinary Council meeting.

In the meantime, it is considered appropriate to propose that training will be conducted on the content of the current Code of Conduct and new provisions when gazetted.

Officer Recommendation on Resolution R3

Council agrees to adopt Recommendation R3 and resolves to engage a training provider to hold workshops for elected members on the City's current Code of Conduct and on the new rules of conduct which will apply to elected members after the October election.

R4. *The City of South Perth commence audio recording of all Council and Committee meetings as recommended in the Report of the Inquiry into the City of South Perth (October 2002) as a backup to written minutes of meetings.*

It is noted that the development of a policy on the audio recording of council meetings is already well advanced and that Council will have the opportunity to resolve on adopting the policy at its ordinary June meeting.

A proposed draft policy on audio recording will be considered at the Audit and Governance Committee meeting also to be held on 6 June 2007. Software solutions are currently being investigated and assessed and when acquired training will need to be conducted prior to being used 'live'. A lead-in time of up to a couple of Council meetings is not considered unreasonable following a Council decision to implement audio recording. It is not thought necessary to record committee meetings where no delegated authority exists. The Department of Local Government and Regional Development concurs with this view.

Officer Recommendation on Resolution R4

Council agrees to adopt Recommendation R4 with the qualification that as its committees do not exercise delegated power, audio recording will be implemented for Council meetings only.

R5. The Department of Local Government and Regional Development, at its discretion, will monitor Council meetings through attendance at those meetings.

The Department of Local Government and Regional Development officers will be attending all Council meetings to monitor progress in rectifying deficiencies identified in the Report. The officers will be attending council meetings whether or not they are open to the public. There is no action required on this recommendation apart from formally acknowledging this direction.

Officer Recommendation on Resolution R5

Council agrees with Recommendation R5 and resolves to invite Departmental officers to attend all council and committee meetings including those which are not open to members of the public.

R6. Where Code of Conduct complaints are about the Mayor, an elected member or the CEO, those complaints should be referred to an independent person for assessment, appointed with the approval of the Department of Local Government and Regional Development. Subsequent to the Local Government (Official Conduct) Amendment Act 2007 being gazetted, the assessment and determination of Code of Conduct matters concerning elected members be in accordance with the process and procedures of that legislation.

The recommendation requires any future Code of Conduct complaints that have been made by or against the Mayor, Councillors and Chief Executive Officer be reported directly to the Department of Local Government and Regional Development.

This is an interim measure until the Official Conduct legislation comes into effect in October 2007. There is no role for the Council other than to appoint a person approved by the Department of Local Government and Regional Development to investigate and report on complaints. Individual complaints would be referred directly to that person to investigate.

The Department is in the process of compiling a list of suitable names from which a person or persons may be selected to perform this task. The person appointed will be required to provide a written report to the Department of Local Government and Regional Development detailing the number of complaints assessed, the nature of those complaints and whether those complaints have been resolved to the satisfaction of the parties.

The costs incurred by the training providers appointed will be borne by the City. A notional sum of \$40,000 will be provided for in the 2007/08 draft Budget for this purpose.

Officer Recommendation on Resolution R6

Council agrees to adopt Recommendation R6 and resolves to ensure that an independent person, approved by the Department, will be appointed for the assessment of any Code of Conduct complaints that have been made by or against the Mayor, Councillors and the CEO.

- R7. The Department of Local Government and Regional Development advise the Minister for Local Government, within a time to be determined, on Council's progress in addressing the breakdown in working relationships and other issues that this report has identified. The Department's advice will encompass:**
- (a) Whether the mediation process has been successful and resulted in improved relationships between elected members and the Administration;**
 - (b) Advice from the independent assessor detailing the numbers of complaints that have been assessed, the nature of those complaints and whether those complaints have been resolved to the satisfaction of the parties concerned, as well as determinations made by the Standards Panel and/or the State Administrative Tribunal under the Local Government (Official Conduct) Amendment Act 2007;**
 - (c) Any other matter relevant to the provision of good government at the City; and**
 - (d) Whether, based on the advice provided in (a), (b) and (c) above, the Council should be suspended and a Panel Inquiry authorised pursuant to Part 8 Division 2 of the Local Government Act 1995.**

This recommendation does not directly relate to the City of South Perth. It does however illustrate the extent of the reporting relationship by the independent persons to Council and the Department through to the Minister. Clearly the Minister needs to be satisfied that good governance is being practiced at the City and that Council is complying with the Report Recommendations.

Officer Recommendation on Resolution 7

Council agrees with Recommendation R7 and resolves to cooperate fully with the Department in the implementation of all recommendations and to do so expeditiously and comprehensively.

Consultation

The Director-General of the Department of Local Government and Regional Development was consulted on matters relating to the implementation of recommendations in the Report. Other organisations as mentioned have been contacted regarding provision of services.

Policy Implications

A new policy P517 "Audio Recording of Council Meetings" relevant to recommendation R4 is currently under development and may shortly be adopted by Council.

Financial Implications

There are likely to be significant financial implications for the City by complying with the Report Recommendations. The recommendations do not have a 'sunset' date and will therefore apply until the Minister is satisfied that deficiencies contained in the Report are rectified. The Monitoring will certainly apply until well after the October 2007 elections (a minimum period of 6 months, until April 2008, is suggested). It is not unreasonable to suggest a total budget in the order of \$100,000 as follows:

Mediator -	\$40,000
Training providers -	\$40,000
Code of Conduct Complaints	<u>\$20,000</u>
Total	\$100,000

This sum has been provided in the 2007/08 Budget as a provisional amount.

Strategic Implications

Consistent with the Strategic Plan: Goal 5 “Organisational Effectiveness” *To be a professional, effective and efficient organisation.*

OFFICER RECOMMENDATION ITEM 6.2
--

That....

- (a) the Report of the Inquiry into the City of South Perth - May 2007 (the Report) be received;
- (b) in accordance with section 8.14(3) of the *Local Government Act*, the Minister for Local Government be advised of the following resolutions which set out the things that the City has done or proposes do, to give effect to the seven (7) Recommendations of the Report:
1. Council agrees to adopt Recommendation R1 and resolves to appoint a professional mediator to moderate the relationship conflicts between elected members and each other and between elected members and the Administration, in accordance with the terms of Recommendation R1.
 2. Council agrees to adopt Recommendation R2 and resolves to appoint training providers approved by the Department. The training providers will be required to report to Council monthly on the outcomes of the program of elected member training.
 3. Council agrees to adopt Recommendation R3 and resolves to engage a training provider to hold workshops for elected members on the City’s current Code of Conduct and on the new rules of conduct which will apply to elected members after the October election.
 4. Council agrees to adopt Recommendation R4 with the qualification that as its Committees do not exercise delegated power, audio recording will be implemented for Council meetings only.
 5. Council agrees with Recommendation R5 and resolves to invite Departmental officers to attend all council and committee meetings including those which are not open to members of the public.
 - 6.. Council agrees to adopt Recommendation R6 and resolves to ensure that an independent person, approved by the Department, will be appointed for the assessment of any Code of Conduct complaints that have been made by or against the Mayor, Councillors and the CEO.
 7. Council agrees with Recommendation R7 and resolves to cooperate fully with the Department in the implementation of all recommendations and to do so expeditiously and comprehensively.

7. CLOSURE