



PRB PAINTERS'
REGISTRATION
BOARD

Annual Report



1 January - 28 August

2011

Foreword

It is my pleasure to present the final report of the Painters' Registration Board that reports on the operations and performance of the Board between 1 January and 28 August 2011.

On 29 August 2011, the introduction of new building services legislation repealed the *Painters' Registration Act 1961* and abolished the Painters' Registration Board, introducing a new Building Services Board administered by the Building Commission, a division of the Department of Commerce. Staff and resources have been transferred to the Building Commission which aims to modernize building regulation through the consolidation of licensing and building standards and the provision of a new dispute resolution services.

Statement of Compliance

In accordance with section 134 of the *Building Services (Registration) Act 2011* I hereby submit to the Minister for Commerce for tabling in Parliament, the Annual Report of the Painters' Registration Board of Western Australia for the period between 1 January and 28 August 2011.

The report has been prepared in accordance with section 23A and 23B of the *Painters' Registration Act 1961*.

Peter Gow
BUILDING COMMISSIONER

Dated this 30th day of November 2011

Table of Contents

OVERVIEW	1
Executive Summary	1
Operational Structure	2
<i>Enabling Legislation FOI/2 AND FOI/5</i>	2
<i>Legislation Administered FOI/3</i>	2
<i>Responsible Minister</i>	2
<i>Area of Jurisdiction FOI/3</i>	2
<i>The Board FOI/6</i>	3
<i>Board Members</i>	3
<i>Board Meetings 2011</i>	3
<i>Executive Staff FOI/4</i>	4
<i>Organisational Structure FOI/4</i>	4
Performance Management Framework	5
<i>Strategic Objectives of the Board FOI/2</i>	5
<i>Registration</i>	5
<i>Compliance</i>	5
<i>Dispute Resolution</i>	5
<i>Education & Awareness</i>	5
<i>Shared Responsibilities with Other Agencies</i>	5
ACHIEVEMENTS	6
<i>Registration</i>	6
<i>Compliance</i>	6
<i>Dispute Resolution</i>	7
<i>Education & Awareness</i>	7
<i>Changes to Key Priorities</i>	7
REPORT ON OPERATIONS.....	8
Registration FOI/5	8
<i>The Register of Painters</i>	8
<i>Applications for Registration</i>	8
<i>Applications for Review of a Decision of the Board to Refuse, Cancel or Suspend Registration, or Refuse Re-registration</i>	8
Compliance FOI/5.....	9
<i>Site Visits and Inspections</i>	9
<i>Investigations</i>	9
<i>Board Referrals to the State Administrative Tribunal FOI/5</i>	10
<i>Prosecutions and Disciplinary Action FOI/7a</i>	11
Dispute Resolution FOI/5	12
<i>Complaints</i>	12
<i>Orders Made by the Board</i>	12
<i>Applications for Review of an Order of the Board to Remedy Unsatisfactory Painting Work or Pay Costs</i>	12
Education and Awareness	13
<i>Stakeholder Education</i>	13
<i>Promotion</i>	13
<i>Publications FOI/7a</i>	13
<i>Exhibitions</i>	14

<i>Sponsorships and Awards</i>	14
<i>Website</i>	14
SIGNIFICANT ISSUES AND TRENDS	15
Painting Activity	15
Changes in Written Law	15
Likely Developments and Forecast of Operations	15
DISCLOSURES & LEGAL COMPLIANCE	16
Financial Statements	16
Ombudsman Complaints	16
Ministerial Directives	16
Capital Works	16
OTHER LEGAL REQUIREMENTS FOI/3	17
Other Key Legislation	17
Advertising	17
Disability Access and Inclusion	17
Public Sector Standards and Ethical Codes	18
Recordkeeping Plan	18
Freedom of Information FOI/1 and FOI/8	19
GOVERNMENT POLICY REQUIREMENTS	21
Substantive Equality	21
Occupational Safety and Health and Injury Management	21
APPENDICES	23
Appendix A: Organisational Chart as at 28 August 2011	23
Appendix B: Financial Statements	23
Appendix B: Financial Statements	24
Appendix C: Information Statement	37

OVERVIEW

Executive Summary

The Board's functions are to:

- maintain a register of registered painters;
- prescribe the course of training and examinations for a painter to be registered;
- issue certificates of registration;
- receive complaints and determine disputes relating to improper and unworkmanlike painting;
- refer registered painters to the State Administrative Tribunal for disciplinary action;
- take proceedings for offences against the *Painters' Registration Act 1961* (the PR Act), or any lawful direction of the Board; and
- receive fees and penalties and apply them to the expenses associated with carrying out the provisions of the PR Act.

The Board's activities between 1 January and 28 August 2011 included maintaining a register of 3,090 painters, processing 188 applications for registration, conducting investigations into 16 allegations of breaches against the PR Act, conducting 107 painting inspections, and undertaking three prosecutions for five offences against the PR Act. The Board also received 37,495 visits to its website and distributed one edition of its newsletter to 3,596 recipients.

The Board met its key priorities in the areas of registration, compliance, dispute resolution and education during 2011, resulting in a 9% average monthly decrease in the number of registration applications received and a 1.3% average monthly increase in the number of registration applications approved compared to the previous reporting period.

The Board received 81 complaints about painting work. Of these, the Board issued 17 orders against painters to pay owners for the costs of rectification, and two orders to rectify unsatisfactory painting work.

During 2011, a key consideration continued to be the planning and preparation of the Board's amalgamation with the Building Commission.

Operational Structure

Enabling Legislation

FOI/2 AND FOI/5

The Painters' Registration Board (the Board) is established under the *Painters' Registration Act 1961*.

Legislation Administered

FOI/3

The Board is responsible for administering the *Painters' Registration Act 1961*, the *Painters' Registration Board Rules 1962* and the *Painters' Registration (Infringement Notices) Regulations 2006*.

Other legislation that the Board must comply with is located in the 'Other Legal Requirements' section of this report.

Responsible Minister

The Hon Simon O'Brien MLC, Minister for Commerce.

Area of Jurisdiction

FOI/3

The Board's area of jurisdiction encompasses the metropolitan region and most of the South West Land Division of the State, excluding the Shires of Mukinbudin, Mt Marshall and Narembeen.

The South West Land Division extends from the Kalbarri area on the west coast, and through the Hopetoun region on the south coast. The Board's area of jurisdiction also includes specified townsites within the Shires of Coolgardie, Dundas, Esperance, Yilgarn, Laverton, Ravensthorpe and the City of Kalgoorlie-Boulder.

A list of local governments that are in the Board's area of jurisdiction is available from the Board's website.

The Board

FOI/6

Section 7 of the *Painters' Registration Act 1961* (the PR Act) provides for a Chairman and four members to be appointed by the Governor of Western Australia. The Chairman and members are nominated by the Minister for Commerce.

Board Members



Mr John Hockley

Chairman

Mr John Hockley

Appointed in June 2010 under section 7(1)(a) of the PR Act.

Deputy: Jim Gatt



Mr Jim Gatt

Member and Deputy Chairman

Mr Jim Gatt

Appointed in January 1980 under section 7(1)(c) of the PR Act.



Mr Jack Mast

Master Painters, Decorators and Signwriters' Association of Western Australia Nominated Member

Mr Jack Mast

Appointed in April 2008 under section 7(1)(b) of the PR Act.

Deputy: Neville Eastabrook



Mr Evan Parker

Consumer Interests, Nominated Member

Mr Evan Parker

Appointed in June 2010 under section 7(1)(e) of the PR Act.

Deputy: Lorraine Young

Board Meetings 2011

Rule 4 of the *Painters' Registration Board Rules 1962* requires the Board to formally meet at least once a month. During the reporting period the Board met on 8 occasions with attendance shown in the following table:

BOARD MEMBER	ATTENDED	DEPUTY ATTENDED
John Hockley (Chairperson)	8	-
Jim Gatt	8	-
Jack Mast	7	-
Evan Parker	7	-

Executive Staff

FOI/4

Section 9 of the *Painters' Registration Act 1961* provides that the Board shall appoint a Registrar who shall also be the Registrar of the Builders' Registration Board and may appoint other officers as considered necessary to carry out the provisions of that Act.



Mr Kim Fare

Registrar

Mr Kim Fare was appointed as Registrar in June 2007.



Ms Nikola Strehle

Deputy Registrar

Ms Nikola Strehle was appointed as Deputy Registrar in November 2007.

Organisational Structure

FOI/4

At 28 August 2011 the Board had three established full-time positions, comprising a Senior Painting Inspector and two Painting Inspectors. The Organisational Chart is at Appendix A.

Other staffing needs were met by employees of the Builders' Registration Board on a recoup basis. This includes a Registration Officer and Registration Assistant who spent 100% of their time on Painters' Registration Board duties, and other employees in the areas of Corporate Services, Policy & Education, Compliance and Legal, who spent part of their time on Painters' Registration Board matters.

Performance Management Framework

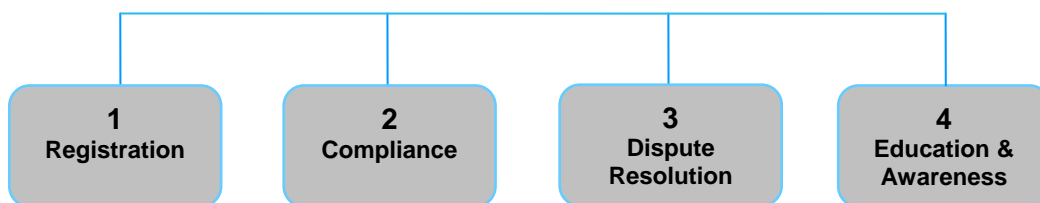
Strategic Objectives of the Board

FOI/2

The Board's objectives are to ensure the highest possible standards of painting for the community by:

- administering the *Painters' Registration Act 1961* in a consistent, reasoned and lawful manner;
- administering the *Painters' Registration Act 1961* in a financially responsible manner; and
- conducting investigations and taking proceedings for offences against the *Painters' Registration Act 1961* in an efficient and consistent manner.

The Board's objectives are carried out within the framework of the following four operational areas:



Registration

- Provide for the registration of painters within the Board's area of jurisdiction.
- Maintain a register of registered painters.

Compliance

- Investigate non-compliance with the *Painters' Registration Act 1961* and take proceedings for offences before the State Administrative Tribunal and the Magistrates Court.

Dispute Resolution

- Provide a dispute resolution service to the community through the provision of an inspection service and issuing orders to remedy and orders to pay for unresolved matters.

Education & Awareness

- Communicate the Board's role and the requirements of the *Painters' Registration Act 1961* to the community.
- Ensure that painters and related industry participants are aware of their obligations under the *Painters' Registration Act 1961*.

Shared Responsibilities with Other Agencies

The Board may allege to the State Administrative Tribunal (SAT) under section 16 of the *Painters' Registration Act 1961* that disciplinary action should be taken against a registered painter for which the SAT may cancel or suspend a painter's registration.

ACHIEVEMENTS

The Board's 2011 key priorities and outcomes under each operational area were:

Registration

Priority 1 Receive and assess applications for registration and refer them to the Board for determination.

Outcome The Board processed 188 applications for registration in 2011. Of these the Board approved 133 applications.

Priority 2 Maintain a Register of Painters and ensure the integrity of that register.

Outcome The Register of Painters is maintained and updated daily. It is reviewed twice per year for inconsistencies and, as at 28 August 2011, there were 3,090 registered painters.

Compliance

Priority 1 Monitor painting work to ensure compliance with Australian Standard 2311: Guide to the Painting of Buildings.

Outcome The Board conducted 1,035 site visits during the 2011 reporting period.

Priority 2 Prepare assessment reports in relation to complaints received about unsatisfactory painting work.

Outcome Ninety-one assessment reports were prepared including 25 reports in relation to matters before the Board.

Priority 3 Conduct inspections of painting work that are subject to dispute.

Outcome The Board conducted a total of 107 inspections that were the subject of a workmanship dispute.

Priority 4 Investigate non-compliance with the *Painters' Registration Act 1961*.

Outcome The Board conducted investigations into 16 allegations of breaches against the *Painters' Registration Act 1961* resulting in the Board undertaking three prosecutions for five offences.

Dispute Resolution

Priority 1 **Ensure disputes are dealt with efficiently and effectively.**

Outcome The Board received 81 complaints. Of these, 25 were referred to a Board hearing resulting in 17 orders to pay and two orders to remedy. Two complaints were withdrawn prior to the hearing and four hearings were adjourned.

Education & Awareness

Priority 1 **Maintain the Board's website as a main source of information, effectively providing accurate information to the Board's stakeholders, and promoting the website and its features.**

Outcome The Board's website provides users with up-to-date, easily accessible information, forms and publications, as well as online services including an e-newsletter subscription, search for a registered painter and fee payment facilities.

Between 1 January and 28 August 2011, the website received a total of 37,495 visits, an average monthly decrease of 3% compared with the previous year.

Priority 2 **Provide community awareness of the requirements of the *Painters' Registration Act 1961*.**

Outcome In 2011 the Board participated in consumer and trade exhibitions, contributed to publications and provided information to stakeholders to increase awareness of the requirement to use a registered painter for work valued over \$200, and the dispute resolution service offered by the Board.

The Board published one newsletter during 2011, circulating 3,596 copies to stakeholders. Subscribers to the Board's e-newsletter increased by 3% from the previous year.

Priority 3 **Sponsor premium industry events to support excellence and high quality workmanship in the painting industry.**

Outcome In 2011 the Board sponsored the Master Painters Association Award for Excellence.

Changes to Key Priorities

There were no changes to the Board's key priorities during the reporting period.

REPORT ON OPERATIONS

Registration

FOI/5

The Register of Painters

Section 10 of the *Painters' Registration Act 1961* requires the Board to compile and keep a Register of Painters containing the names, addresses and qualifications of painters admitted to the Register.

The Register is open for inspection by any person during the Board's ordinary hours of business at no charge. It is available to search and download from the Board's website or for purchase as a hard copy.

As at 28 August 2011 there were 3,090 painters registered with the Board, comprising 2,492 individuals, 375 partnerships and 223 companies.

REGISTRATIONS BY TYPE					
CATEGORY	2007	2008	2009	2010	2011
Individuals	2,360	2,380	2,471	2,503	2,492
Partnerships	452	423	400	393	375
Companies	200	202	216	218	223
TOTAL	3,012	3,005	3,087	3,114	3,090

Applications for Registration

Between 1 January and 28 August 2011 the Board processed 188 applications for registration, of which 132 were new applications received in 2011 and 56 were pending from 2010. Of those applications processed, 133 were approved, 51 were refused, six were withdrawn and 64 are pending.

During the reporting period the Board granted registration to 95 individuals, 18 partnerships and 20 companies.

Applications for Review of a Decision of the Board to Refuse, Cancel or Suspend Registration, or Refuse Re-registration

Section 18 of the *Painters' Registration Act 1961* allows any person to apply to the State Administrative Tribunal (the SAT) for a review of a decision of the Board to refuse, cancel or suspend a registration. In 2011 there were no applications made to the SAT for such review.

Compliance

FOI/5

Site Visits and Inspections

The Board monitors industry compliance with the *Painters' Registration Act 1961* by conducting random site visits. These visits detect unregistered painting activity and promote awareness of the regulatory framework. In 2011 the Board undertook 1,035 site visits in Perth, the Mid-West, and Great Southern regions.

The Board also undertakes inspections of painting work, upon the request of either an owner or painter, to prepare notices of assessment in relation to workmanship complaints lodged with the Board or at random as part of the Board's compliance program.

In the 2011 reporting period the Board undertook 107 inspections of painting work, of which:

- 81 were conducted upon the request of a painter or owner;
- 81 were conducted in response to complaints lodged with the Board;
- 20 were conducted on request from the Building Disputes Tribunal; and
- 6 were re-inspections of initial complaints lodged with the Board.

All inspections are undertaken free of charge and are conducted by painting inspectors employed by the Board.

Investigations

The Board conducts investigations into allegations of breaches against the *Painters' Registration Act 1961* (PR Act). In cases warranting the suspension or cancellation of a painter's registration, the Board refers matters to the State Administrative Tribunal for disciplinary action. The Registrar may also initiate prosecution proceedings through the courts.

In the 2011 reporting period, the Board formally investigated 16 allegations of breaches against the PR Act.

INVESTIGATIONS COMPLETED		
No. of Investigations	Section of PR Act*	Nature
13	section 4(1)	Unregistered Painting
1	section 4A	Holding out as a Registered Painter

*primary allegation

At 28 August 2011 there were two investigations in progress.

INVESTIGATIONS IN PROGRESS		
No. of Investigations	Section of PR Act*	Nature
2	section 4(1)	Unregistered Painting

*primary allegation

Board Referrals to the State Administrative Tribunal

FOI/5

Section 16(1) of the *Painters' Registration Act 1961* provides that the Board may allege to the State Administrative Tribunal (the SAT) that disciplinary action should be taken against a registered painter for the following:

- The registration was obtained by fraud or misrepresentation.
- The painter has been guilty of fraudulent conduct, negligence or incompetence in carrying out painting.
- The painter has been convicted of an offence for failing to comply with an Order of the Board.
- The painter, being a partnership or company or other body corporate, has failed to comply with any provision of section 14B.
- The painter, being a partnership, company or other body corporate, has ceased to have at least one partner, director or employee whose duty is to manage or supervise painting work carried out by the entity registered under the *Painters' Registration Act 1961*.

During the reporting period no matters were referred to the SAT.

Prosecutions and Disciplinary Action

FOI/7a

The Board investigates alleged breaches of the *Painters' Registration Act 1961* and may take proceedings for offences in the Magistrates Court.

In 2011 the Board undertook three prosecutions pursuant to the *Painters' Registration Act 1961* for five offences of unregistered painting and holding out to be a registered painter, the outcomes of which are listed in the following table:

PROSECUTIONS			
NAME	SECTION	FINES	COSTS
Peter Whitburn	4(1)	\$300	\$279
Nils Kristian Sav	4A	\$1,250	\$350
	4(1)		
Harry Frank Flynn	4(1)	\$250	\$750
	4A(A)		
	TOTAL	\$1,800	\$1,380

One prosecution that commenced in 2011 was pending as at 28 August 2011.

Dispute Resolution

FOI/5

Complaints

In 2011 the Board received 81 complaints about unsatisfactory painting work. Of these complaints, 25 were referred to a Board hearing for determination, while the remaining complaints were resolved between the parties with the assistance of the Board's inspectors.

Orders Made by the Board

Section 16D of the *Painters' Registration Act 1961* provides that if the Board is satisfied that painting has not been carried out in a proper and workmanlike manner on any building or other structure, the Board may order the painter to either remedy the work or pay the owner of the building such costs of having the work remedied by someone else.

In 2011 the Board ordered 17 painters to pay owners for the costs of rectification, and two orders to remedy unsatisfactory painting work. Prior to making an order, the Board must give the painter notice of the allegations and an opportunity to respond at a hearing. In 2011 the Board held 23 hearings.

The value of orders to pay issued by the Board in 2011 was \$31,568, an increase of 8% from the previous year. Orders made by the Board over the past five years are provided in the following table:

NUMBER OF ORDERS MADE BY THE BOARD					
TYPE OF ORDER	2007	2008	2009	2010	2011
Orders to Remedy	2	1	2	4	2
Orders to Pay	20	13	11	25	17
Value of Orders to Pay	\$60,702	\$45,664	\$40,763	\$29,203.50	\$31,568

Applications for Review of an Order of the Board to Remedy Unsatisfactory Painting Work or Pay Costs.

Section 18 of the *Painters' Registration Act 1961* provides that a person against whom an order is made, who is aggrieved by a reviewable decision of the Board may apply to the State Administrative Tribunal (SAT) for a review of an order of the Board under 16D or 16E of that Act.

There were no applications made to the SAT for a review of an order made by the Board in 2011.

Education and Awareness

During 2011 the Board continued to promote community and industry awareness of its services, and the requirements of the *Painters' Registration Act 1961*.

Stakeholder Education

The Board provided information to 79 newly registered businesses with the Business Names Register, Department of Commerce that may carry out painting work, advising of the registration requirements for a painter who carries out work valued over \$200.

Promotion

During 2011, the Board continued to promote its eNewsletter to increase the number of subscribers and reduce the environmental impact of sending hard copies. The promotion resulted in the number of subscribers increasing from 1,426 in December 2010 to 1469 in August 2011.

The promotion included a flyer that was distributed with general correspondence, at exhibitions and from the Board's reception area. The Board also raised awareness of its eNewsletter by contributing to the following publications:

- *Brush Strokes* (Master Painters Australia WA Association Trade Magazine)
- *Master Painters Pricing and Estimating Guide*
- *The Building and Renovating Guide* (HomeBase Expo)
- *Master Builders Association's online A-Z Directory*

Publications

FOI/7a

The Board published one newsletter providing industry and stakeholders with technical advice, legislative requirements and activities being carried out by the Board. The newsletter is circulated to stakeholders in hard copy or as an e-newsletter. In 2011, 2,127 hard copies and 1,469 e-newsletters were distributed.

During 2011, the Board's publications, 'Consumers and Painting Professionals' and its Assessment Guides, were updated and made available from the Board's office and website. New flyers advising stakeholders of the pending amalgamation with the Building Commission were also developed.

The Board revised the information pack provided to newly registered painters, producing suite of six information sheets covering topics including painters' responsibilities and obligations, professional conduct and Australian Standards. The package is distributed to all newly registered painters.

Publications are distributed to stakeholders via post and e-mail, made available at exhibitions, and from industry association seminars and displays.

Exhibitions

In 2011 the Board participated at the following industry/consumer exhibitions in both metropolitan and regional areas:

- HomeBase Expo Expo, February 2011
- Ideal Home Show, March 2011
- Master Painters Association Painting and Decorating Trade Show, March 2011
- Master Builders Association Home and Sustainability Show, June 2011

Sponsorships and Awards

The sponsorship of awards promotes excellence within the painting industry and provides an opportunity for the Board to raise awareness of its role in the community.

In 2011 the Board sponsored the Master Painters Association "Excellence in Painting Awards". Benefits included recognition of the Board on promotional material, in articles and on displays.

Website

The Board's website located at www.painters.wa.gov.au provides users with up to date information on the services available to the community, including a search of the Register of Painters, reasons for decision, forms and publications, enewsletter subscription and an online payment facility.

During the 2011 reporting period, the total number of visits to the website was 37,495, an average monthly decrease of 3% on last year's total of 58,150.

The graph below shows the number of monthly visits to the Board's website during 2011.



SIGNIFICANT ISSUES AND TRENDS

Painting Activity

Section 23B of the *Painters' Registration Act 1961* requires the Board to report on any trends or special problems that may have emerged during the reporting period.

In 2011, the Board saw registration activity remain fairly stable, reflecting the stability in economic conditions and demand for skilled and qualified painters.

Complaints received by the Board regarding unsatisfactory painting work continued to decrease in 2011, possibly signifying that industry standards are improving.

Changes in Written Law

On 22 June 2011 changes to the fees in the Third Appendix of the *Painters' Registration Rules* were made as follows:

The following fees are prescribed for the purposes of these rules —

1. For examination \$6.30
2. For application for registration —
 - (a) companies \$123.00
 - (b) individuals \$123.00
 - (c) partnerships \$94.00
3. For annual registration fee —
 - (a) companies \$356.00
 - (b) individuals \$236.00
 - (c) partnerships \$146.00

Likely Developments and Forecast of Operations

Section 23B of the *Painters' Registration Act 1961* requires the Board to report on forecasts of the workload of the Board in the year after the year to which the report relates.

On 29 August 2011, the introduction of new building services legislation repealed the *Painters' Registration Act 1961* and abolished the Painters' Registration Board, introducing a new Building Services Board administered by the Building Commission, a division of the Department of Commerce. Staff and resources have been transferred to the Building Commission which aims to modernize building regulation through the consolidation of licensing and building standards and the provision of a new dispute resolution services.

DISCLOSURES & LEGAL COMPLIANCE

Financial Statements

Section 23A of the *Painters' Registration Act 1961* requires that the accounts and financial statements of the Board shall be audited at the expense of the Board by an auditor appointed by the Board with prior approval of the Minister.

Bentleys was appointed and approved to audit the 2011 accounts.

A copy of the financial statements and auditor's report is at Appendix B of this report.

Ombudsman Complaints

Complaints regarding administrative actions or omissions by the Board can be investigated by the State Ombudsman under the provisions of the *Parliamentary Commission Act 1971*.

There were no complaints investigated by the State Ombudsman in 2011.

Ministerial Directives

No Ministerial directives were issued to the Board in 2011.

Capital Works

There were no capital works projects undertaken by the Board during the reporting period.

OTHER LEGAL REQUIREMENTS

FOI/3

Other Key Legislation

The principal legislation determining the Board's statutory functions is the *Painters' Registration Act 1961*, the *Painters' Registration Board Rules 1962* and the *Painters' Registration (Infringement Notices) Regulations 2006*. In the performance of its functions, the Board also complies with other legislation, including the following:

- *Corruption and Crime Commission Act 2003*
- *Criminal Procedure Act 2004*
- *Disability Services Act 1993*
- *Electoral Act 1907*
- *Electronic Transactions Act 2003*
- *Equal Opportunity Act 1984*
- *Freedom of Information Act 1992*
- *Industrial Relations Act 1979*
- *Minimum Conditions of Employment Act 1993*
- *Mutual Recognition (WA) Act 2001 & 2010*
- *Occupational Safety & Health Act 1984*
- *Parliamentary Commission Act 1971*
- *Payroll Tax Assessment Act 2002*
- *Public Sector Management Act 1994*
- *Public Interest Disclosure Act 2003*
- *State Records Act 2000*
- *Stamp Act 1921*
- *State Administrative Tribunal Act 2004*
- *State Superannuation Act 2000*
- *State Supply Commission Act 1991*
- *Statutory Corporation (Liability of Directors) Act 1996*
- *Superannuation and Family Benefits Act 1938*
- *Workers' Compensation and Injury Management Act 1981*

Advertising

In compliance with section 175ZE of the *Electoral Act 1907*, the Board reports that no expenditure was incurred during 2011 with media advertising organisations.

Disability Access and Inclusion

In compliance with section 29 of the *Disability Services Act 1993*, the Board provides people with disabilities equal opportunity to access the services of the Board. The Board provides persons with disabilities the same level and quality of service as it does other people, including the opportunity to make a complaint, and the inclusion of all persons when seeking public or industry consultation.

The Board's website has been designed in accordance with the content accessibility guidelines set out in the Government's Guidelines for State Government Websites to minimise the barriers faced by people with disabilities.

The Board's accommodation at Level 1, 31 Troode Street, West Perth, is also the premises of the Builders' Registration Board, the Plumbers Licensing Board and the Building Commission, a division of the Department of Commerce. The building provides for disability access and facilities. A reception area is located on the first floor with ramp access to the foyer area and lifts to the first floor. Temporary parking is provided directly in front of the building to enable wheelchair access and disabled toilet facilities are accessible.

The Department of Commerce will include the Building Commission in its Disability Access and Inclusion Plan for 2012-2016.

Public Sector Standards and Ethical Codes

The Board's Staff Code of Conduct reflects the Western Australian Public Sector Code of Ethics, setting out the conduct and behaviour expected of all employees. Additional Codes of Conduct have also been developed for staff in roles of high risk to conflicts of interest, misuse of resources or corruption and misconduct.

During 2011, there were no claims of a breach of the Public Sector Standards and the Western Australian Public Sector Code of Ethics.

The Board informed new staff of the requirements of the codes during their induction and existing staff of changes. Access to the standards and codes is made available to staff on the Board's intranet.

Recordkeeping Plan

The Board's Recordkeeping Plan (RKP 2010015) was reviewed and approved by the State Records Office on 7 April 2010 as complying with the *State Records Act 2000*. The plan demonstrated progress toward better practice recordkeeping and compliance with the minimum requirements of SRC Standard 2: Recordkeeping Plans and SRC Standard 6: Outsourcing.

In accordance with section 28 of the *State Records Act 2000*, the Board's plan is to be reviewed within five years of its approval date and a report of the review submitted to the State Records Office by 7 April 2015.

The efficiency and effectiveness of the Board's recordkeeping systems were assessed as part of the review of the plan and found to be either effective or very good.

The Board's recordkeeping training program consists of an induction program for all existing and new staff, mandatory training in the Board's records management system (Synergy), regular communication regarding any recordkeeping issues and regular meetings of information management staff to identify and develop strategies to address any issues.

The Board's induction program addresses employee roles and responsibilities in regard to their compliance with the recordkeeping plan. All staff when initially trained in the Board's recordkeeping procedures and policies are informed of their responsibilities under the *State Records Act 2000*.

The policy and procedures documents/manuals for records management, as well as the Records Keeping Plan and the Retention and Disposal Authorities, are available to all staff on the Board's intranet.

Freedom of Information

FOI/1 and FOI/8

In compliance with the *Freedom of Information Act 1992*, the Board provides guidance regarding the application process to obtain information. Board staff ensure that information is provided promptly and at the least possible cost to all persons. An Information Statement is attached at Appendix C.

Those seeking information that is not routinely available are advised of the provisions of the *Freedom of Information Act 1992*, the application process and all associated costs. Applications are acknowledged in writing and the parties are notified of a decision within 45 days.

Applications and enquiries are directed to:

The Senior Legal Officer
Painters' Registration Board
Locked Bag 12
West Perth WA 6872
Tel: (08) 9476 1212; Fax (08) 9476 1276

Applications

The Board received no Freedom of Information applications in 2011.

Charges

FOI/7a

The Board's scale of fees and charges for eligible information is set under the Freedom of Information Regulations. Apart from the application fee for non-personal information, charges are discretionary and are as follows:

Personal information about the applicant	No fee
Application fee (for non personal information)	\$30.00
Charge for time dealing with the application (per hour / pro rata)	\$30.00
Access time supervised by staff (per hour / pro rata)	\$30.00
Photocopying staff time (per hour / pro rata)	\$30.00
Per photocopy	\$ 0.20
Transcribing from tape, film or computer	\$30.00
Duplicating a tape, film or computer information	Actual Cost
Delivery, packaging and postage	Actual Cost

(Note: For financially disadvantaged applicants or those issued with prescribed pensioner concession cards, the charge payable is reduced by 25%).

Deposits

Advance deposits may be required based on the estimated charges (25% of cost) and a further advance deposit may be required to meet the charges for dealing with the application (75% of cost).

Access Arrangements

FOI/8

Access to documents is granted through inspection, by providing a copy of a document, a transcript of a recorded hearing, shorthand or an encoded document from which words can be reproduced.

Viewing Documents

Documents are available to be viewed at the Board's office during business hours, with a fee charged for the supervised viewing of non-personal documents.

Notice of Decision

FOI/7a

As soon as possible, but no later than 45 days after the application is received, the applicant is provided with a notice of decision, which includes the following details:

- the date when the decision was made;
- the name and position of the officer who made the decision;
- if the document is an exempt document, the reasons for classifying the matter exempt, or the fact that access was given to an edited document; and
- information on the right for review and the procedures to be followed.

Refusal of Access

Applicants who are dissatisfied with a decision of the Board's officer are entitled to ask for an internal review by the Registrar. Applications have to be received in writing within 30 days of receiving the notice of decision. All applicants are notified of the outcome of the review within 15 days.

Applicants who disagree with the result can also apply to the Information Commissioner for an external review, the details of which are passed on to applicants when the internal review decision is issued.

Client Information

FOI/7a

Throughout 2011, the Board had a number of publications that could be accessed. These include:

- Prescribed forms used to apply for:
 - Registration as a painter
 - FOI requests
- Publications, such as:
 - The Board's Newsletter
 - Annual Report
 - Consumers and Painting Professionals brochure
- Internal documents available on written request include:
 - Policy statements
 - Minutes of Board meetings (in an edited form)
 - Reasons for Decision.

Information including application forms, annual reports, newsletters and the register of painters was downloadable from the Board's website at www.painters.wa.gov.au.

GOVERNMENT POLICY REQUIREMENTS

Substantive Equality

The Board is not represented on the Strategic Management Council and is not required to implement the policy framework for Substantive Equality.

Occupational Safety and Health and Injury Management

In accordance with the Public Sector Commissioner's Circular 2009/11, the Board continued to maintain a high level of workplace health and safety for its employees and visitors during the reporting period.

Statement of Commitment

The Board is committed to maintaining a safe and healthy work environment through the creation and implementation of occupational safety and health policies and procedures. A dedicated occupational safety and health committee meets monthly to deal with any relevant issues and to maintain the Board's policies and procedures.

The Board's Occupational Health and Safety Policy, Procedure and Guidelines is made available to staff on the Board's intranet and is provided to new employees at their induction. The Board's goal each year is to have no workplace injuries or incidents and to reduce the risk of incidents by having staff carefully monitor their own workspace.

Formal Mechanisms

The Occupational Safety and Health Committee, comprising of management and a nominated Occupational Safety and Health Officer, is responsible for the maintenance and implementation of the Board's policies and procedures and is the mechanism through which all occupational safety and health issues are directed and dealt with.

Procedures are in place so that staff can quickly identify and report any hazards that could pose a risk to workplace safety and health. When a hazard is identified, staff are required to alert one of the Occupational Safety and Health Officers and follow procedures set out in the *Occupational Health and Safety Policy, Procedure and Guidelines*.

Statement of Compliance with Injury Management Requirements

In accordance with the *Workers' Compensation and Injury Management Act 1981*, the Board has implemented an Injury Management System and Return to Work Program to which a member of staff, responsible for the day to day injury management, is appointed to oversee and maintain.

Statement Confirming Self Evaluation

In accordance with the *Code of Practice – Occupational Safety and Health in the Public Sector*, the Board conducted a self evaluation of its management systems using the prescribed *Checklist of Requirements for Occupational Safety and Health Management System*.

The findings of the evaluation were that the Board had carried out the following:

- Ongoing development of and adherence to safety and health guidelines, procedures and policies
- Use of consultative mechanisms
- Maintenance of a training and instruction program
- Regular workplace inspections
- Effective incident reporting and investigation
- Data collection, analysis/record keeping and reporting
- Redevelopment and rehearsal of emergency procedures
- Adherence to procedures for effective injury management
- Regular monitoring and evaluation of performance to ensure continuous improvement
- Development of processes to manage specific hazards and work organisational issues
- Job Safety Analyses carried out for Information Services staff providing procedures for safe handling of records
- Use of an audit checklist when carrying out inspections
- Promotion and information of Occupational Safety and Health requirements
- Consideration of targets and performance indicators to measure process

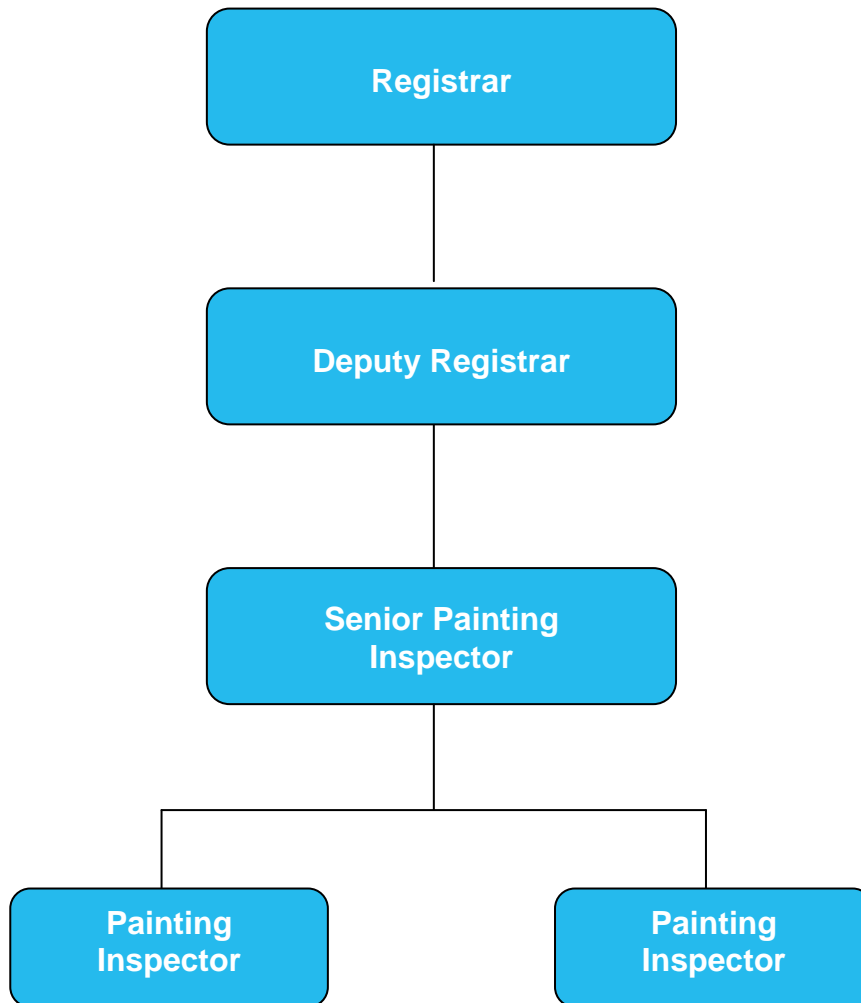
Report on Performance

In 2011 the Board had no fatalities and no 'lost time due to injury/diseases' claims.

INDICATOR	TARGET	PERFORMANCE
Number of fatalities	0	0
Lost time injury/disease incidence rate	0	0
Lost time injury severity rate	0	0
Percentage of injured workers returned to work within 28 weeks	100%	NA
Percentage of managers trained in occupational safety, health and injury management responsibilities	> or = 50%	50%

APPENDICES

Appendix A: Organisational Chart as at 28 August 2011



Appendix B: Financial Statements

Section 23A of the *Painters' Registration Act 1961* requires that the accounts and financial statements of the Board shall be audited at the expense of the Board by an auditor appointed by the Board with prior approval of the Minister.

Bentleys was appointed and approved to audit the 2011 accounts.

Board Statement on its Finances

The financial outcome for the calendar year ending 28 August 2011 is an operating deficit of \$108,097 against a full year budget deficit of \$59,200. This is largely a result of unbudgeted one off additional salary payments to technical staff, for the loss of use of a government vehicle, of \$66,815, unbudgeted investment income of \$20,551, and the realisation of \$35,551 of registration and application revenue over the pro-rata budget amount.

Peter Gow
BUILDING COMMISSIONER

**STATEMENT BY BUILDING COMMISSIONER
FOR THE PERIOD 1 JANUARY 2010 TO 28 AUGUST 2011**

In the opinion of the Building Commissioner, the financial statements as set out on pages 26 to 36:

1. Presents fairly the financial position of the Painters' Registration Board as at 28 August 2011 and its performance for the period ended on that date in accordance with the accounting policies described in Note 1 to the Financial Statements.
2. The report has been properly prepared by a competent person.
3.
 - a) The Board has kept such accounting records as to correctly record and explain the transactions and financial position of the Board.
 - b) The Board has kept its accounting records in such a manner as would enable true and fair accounts of the Board to be prepared from time to time.

The last day of formal operations of the Painters' Registration Board was Sunday 28 August 2011. On Monday 29 August the Building Services (Registration) Act 2011 came into operation which amongst other things transferred all staff and functions of the Builders' and Painters' Registration Boards to the Department of Commerce. Section 131(1)(b) of the Act provides that as from Monday 29 August 2011, the liabilities of the former board (including a share of a liability) immediately before that day become, by force of this section, the liabilities of the State. Therefore at the date of this statement, there are reasonable grounds to believe that the debts of the Board can be met as and when they fall due.

Peter Gow
BUILDING COMMISSIONER

Dated this 30th day of November 2011

Independent Auditor's Report

To the Minister for Commerce for The Painters' Registration Board

We have audited the accompanying financial report, being a special purpose financial report, of The Painters' Registration Board, which comprises the balance sheet as at 28 August 2011, the income statement and cash flow statement for the period ended on that date, notes to and forming part of the financial statements and the statement by the Building Commissioner.

Bentleys Audit & Corporate
(WA) Pty Ltd

Level 1, 12 Kings Park Road
West Perth WA 6005
Australia

PO Box 44
West Perth WA 6872
Australia

ABN 33 121 222 802

T +61 8 9226 4500

F +61 8 9226 4300

bentleys.com.au

Boards' Responsibility for the Financial Report

The Board is responsible for the preparation and fair presentation of the financial report and have determined that the accounting policies described in Note 1 to the financial statements, which form part of the financial report, are consistent with the financial reporting requirements of section 23(1) of the Painters' Registration Act 1961 (as amended), and are appropriate to meet the needs of the Board. This responsibility includes establishing and maintaining internal control relevant to the preparation and fair presentation of the financial report that is free from material misstatement, whether due to fraud or error; selecting and applying appropriate accounting policies; and making accounting estimates that are reasonable in the circumstances.

Auditor's Responsibility

Our responsibility is to express an opinion on the financial report based on our audit. We conducted our audit in accordance with Australian Auditing Standards. These Auditing Standards require that we comply with relevant ethical requirements relating to audit engagements and plan and perform the audit to obtain reasonable assurance whether the financial report is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial report. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial report, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial report in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by the Board, as well as evaluating the overall presentation of the financial report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Independent Audit Report

To the Minister of Commerce for the Painters' Registration Board (Continued)



Independence

In conducting our audit, we followed applicable independence requirements of Australian professional ethical pronouncements.

Auditor's Opinion

In our opinion, the financial report of The Painters' Registration Board presents fairly, in all material respects the financial position of the Painters' Registration Board as of 28 August 2011 and of its financial performance for the period then ended in accordance with the accounting policies described in Note 1 to the financial statements and under section 23(1) of the Painters' Registration Act 1961 (as amended).

A handwritten signature in blue ink that reads "Bentley's".

BENTLEYS
Chartered Accountants

A handwritten signature in blue ink that reads "Chris Watts".

CHRIS WATTS CA
Director

DATED at PERTH this 22nd day of November 2011

**INCOME AND EXPENDITURE REPORT
FOR THE PERIOD 1 JANUARY 2011 TO 28 AUGUST 2011**

	Notes	1 January to 28 August 2011 \$	12 months to 31 December 2010 \$
Income			
Annual registration fees		475,569	700,700
Application fees		22,150	29,401
Assessments		5,808	9,517
Certificate fees		1,540	1,980
Infringements		480	80
Interest on investments		20,551	41,123
Other income		98	91
Petrol contribution - Inspectors		233	463
Prosecution recoveries		3,181	5,847
Total Income		529,610	789,202
Expenditure			
Administration expenses	5	24,870	7,876
Advertising and promotion		5,250	5,468
Annual leave		6,223	11,445
Audit		11,000	10,250
Bad debts		0	7,357
Bank charges		6,038	7,021
Board members' fees		23,078	39,368
Board members' other expenses		3,328	6,375
Computer costs other		3,218	2,041
Consultants-human resources		0	2,161
Debt recovery services		230	175
Depreciation		2,577	2,950
Doubtful debts		1,624	(7,775)
Exhibitions		961	4,000
Examinations and assessments		11,635	16,226
Fringe benefit tax		7,829	7,357
General office expenses		1,075	425
Insurance premiums		2,425	3,118
Legal expenses		27,837	38,766
Long service leave		(17)	(3,627)
Motor vehicle expenses		24,991	40,981
Photocopying – machine costs		2,211	3,441
Postage and courier charges		2,530	8,526
Printing and stationery		3,231	10,649
Publications		890	7,402
Premise expenses		40,035	52,172

The accompanying notes form part of this financial report.

**INCOME AND EXPENDITURE REPORT
FOR THE PERIOD 1 JANUARY 2011 TO 28 AUGUST 2011**

Notes	1 January to 28 August 2011 \$	12 months to 31 December 2010 \$
Expenditure (cont...)		
Premise fit out	0	153,418
Salaries - administration	78,798	96,414
Salaries - corporate support	101,231	152,145
Salaries - inspectors	212,914	206,749
Salaries - agency	0	7,535
Social business expenses	0	63
Staff training expenses	0	34
Staff uniforms	105	0
Superannuation	26,965	24,659
Tape transcriptions	50	1,008
Telephones	566	785
Travelling and accommodation	879	2,416
Write off of fixed assets	3,130	0
Total Expenditure	637,707	929,374
Operating Surplus/(Deficit)	(108,097)	(140,172)

The accompanying notes form part of this financial report.

**BALANCE SHEET
AS AT 28 AUGUST 2011**

	Notes	28 August 2011	31 December 2010
			\$
Current assets			
Cash	6(a)	676,009	499,245
Receivables	2	4,563	21,877
Prepayments		0	8,386
Total current assets		680,572	529,508
Non-current assets			
Property, plant and equipment	3	0	1,948
Intangible asset	4	0	3,759
Total non-current assets		0	5,707
TOTAL ASSETS		680,572	535,215
Current liabilities			
Payable / Accrued expenses		87,865	29,047
GST payable		0	46,781
Registration fees in advance		47,858	45,930
Provision for employee entitlements		235,211	0
TOTAL CURRENT LIABILITIES		370,934	121,758
Non-current liabilities			
Provision for employee entitlements		20,065	15,787
TOTAL NON-CURRENT LIABILITIES		20,065	15,787
TOTAL LIABILITIES		390,999	137,545
NET ASSETS		289,573	397,670
BOARD FUNDS & RESERVES			
Balance at the beginning of the year		397,670	537,842
Operating Surplus (Deficit)		(108,097)	(140,172)
TOTAL BOARD FUNDS & RESERVES		289,573	397,670

The accompanying notes form part of this financial report.

**CASH FLOW STATEMENT
FOR THE PERIOD 1 JANUARY 2011 TO 28 AUGUST 2011**

	Notes	1 January to 28 August 2011 \$	12 months to 31 December 2010 \$
Cash flows from operating activities			
Receipts from Registered Painters		430,190	723,780
Payments to suppliers and employees		(323,380)	(918,935)
Interest received		20,551	42,917
Prosecution and infringement recovery		4,563	4,031
Other receipts		44,840	26,455
Net cash flow provided by operating activities	6(b)	176,764	(121,752)
Net increase/(decrease) in cash held		176,764	(121,752)
Cash at the beginning of the financial year		499,245	620,997
Cash at the end of the financial year	6(a)	676,009	499,245

The accompanying notes form part of this financial report.

**NOTES TO AND FORMING PART OF THE FINANCIAL STATEMENT
FOR THE PERIOD 1 JANUARY 2011 TO 28 AUGUST 2011**

NOTE 1 ACCOUNTING METHODS AND POLICIES

This financial statement is a special purpose financial statement prepared in order to satisfy the financial reporting requirements of the Board under the *Painters' Registration Act 1961* (as amended). The Members of the Board have determined that the Board is not a reporting entity.

The financial statement has been prepared in accordance with the requirements of the *Painters' Registration Act 1961* (as amended) and the following Australian Accounting Standards:

AASB 110: Events after the Balance Sheet Date
AASB 1031: Materiality

No other Australian Accounting Standards, Australian Accounting Interpretations or other authoritative pronouncements of the Australian Accounting Standards Board have been applied.

The financial statement has been prepared on an accruals basis and is based on historic costs and does not take account of changing money values or, except where specifically stated, current valuations of non-current assets.

The following specific accounting policies, which, unless otherwise stated, are consistent with the previous year, have been adopted in the preparation of this financial statement:

(a) Depreciation/Amortisation

Depreciation/Amortisation is calculated on the diminishing value basis in order to write the assets off over their useful economic life. The rates of depreciation/amortisation used for each class of assets are:

<u>Class of Asset</u>	<u>Depreciation/Amortisation Rate</u>
Property, plant and equipment	15%-20%
Information Technology Website Design	40%

(b) Income Tax

No provision for income tax is necessary as the organisation is exempt from income tax under Division 50 of the *Income Tax Assessment Act 1997*.

(c) Employee Entitlements

A liability for annual and long service leave is recognised in respect of services provided up to balance date. No material liability exists for personal (sick) leave.

**NOTES TO AND FORMING PART OF THE FINANCIAL STATEMENT
FOR THE PERIOD 1 JANUARY 2011 TO 28 AUGUST 2011**

NOTE 2 RECEIVABLES

	2011	31 December 2010
	\$	\$
GST refund	0	14,817
Registration fees	0	1,401
Prosecutions	9,970	9,247
Other Debtors	0	194
	<u>9,970</u>	<u>25,659</u>
Less: Provision for doubtful debts	(5,407)	(3,782)
	<u>4,563</u>	<u>21,877</u>

NOTE 3 PROPERTY, PLANT & EQUIPMENT

	2011	31 December 2010
	\$	\$
Office equipment	0	4,643
Less: Accumulated depreciation	0	(2,695)
	<u>0</u>	<u>1,948</u>
Total property, plant and equipment	<u>0</u>	<u>1,948</u>

NOTE 4 INTANGIBLE ASSET

	2011	31 December 2010
	\$	\$
Information Technology - Website Design	0	20,474
Less: Accumulated amortisation	0	(16,715)
	<u>0</u>	<u>3,759</u>
Total Intangible Asset	<u>0</u>	<u>3,759</u>

**NOTES TO AND FORMING PART OF THE FINANCIAL STATEMENT
FOR THE PERIOD 1 JANUARY 2011 TO 28 AUGUST 2011**

NOTE 5 ADMINISTRATION EXPENSES

Administration expenses relates to charges from the Builders' Registration Board of WA for the use of premises, staff and equipment provided and financed by the Builders' Registration Board of WA. A review was undertaken in 2011, the Administration Expenses now relates to charges from the Builders' Registration Board of WA for the use of the following:

	2011	2010
	\$	\$
Reimbursement of premise expense	0	(14,702)
Office expenses	14,710	13,369
Printing and stationery	4,234	3,892
Telephone	5,926	5,317
	<u>24,870</u>	<u>7,876</u>

**NOTES TO AND FORMING PART OF THE FINANCIAL STATEMENT
FOR THE PERIOD 1 JANUARY 2011 TO 28 AUGUST 2011**

NOTE 6 NOTES TO THE CASH FLOW STATEMENT

(a) Reconciliation of cash

For the purposes of the cash flow statement, cash includes cash on hand and in banks, net of outstanding bank overdrafts, and short term money market balances. Cash at the end of the financial year is reconciled to the related items in the balance sheet as follows:-

	28 August 2011	31 December 2010
	\$	\$
Cash on hand	100	806
Cash at bank – General Account	675,909	498,439
	676,009	499,245

(b) Reconciliation of net cash flow from operating activities to operating surplus/(deficit)

	28 August 2011	31 December 2010
	\$	\$
Operating surplus (deficit) for the period	(108,097)	(140,172)
Non cash flows in operating surplus:		
- depreciation	5,707	2,950
- doubtful debts	1,625	(7,775)
Net movement in assets and liabilities:		
- (increase)/decrease in receivables	15,689	(10,270)
- (increase)/decrease in prepayments	8,386	(703)
- (increase)/decrease in interest accrued	-	1,794
- increase/(decrease) in sundry creditors	(15,199)	(5,835)
- increase/(decrease) in accrued expenses	74,017	6,210
- increase/(decrease) in fees in advance	(46,781)	24,232
- increase in income in advance	235,211	-
- increase/(decrease) in provision for employee entitlements	6,206	7,817
Net cash provided by operating activities	176,764	(121,752)

NOTE 7 EVENTS AFTER THE BALANCE SHEET DATE

The last day of formal operations of the Builders' Registration Board of Western Australia and the Painters' Registration Board was Sunday 28 August 2011. On Monday 29 August the *Building Services (Registration) Act 2011* came into operation which amongst other things transferred all staff and functions of the Builders' and Painters' Registration Boards to the Department of Commerce. Section 118(1)(b) of the Act provides that as from Monday 29 August 2011, the liabilities of the former board (including a share of a liability) immediately before that day become, by force of this section, the liabilities of the State. Therefore at the date of this statement, there are reasonable grounds to believe that the debts of the Board can be met as and when they fall due.

Appendix C: Information Statement

	PAGE/S	FOI
Index	19	FOI/1
Mission and Objectives	2, 5	FOI/2
Legislation administered	2, 17	FOI/3
Organisational structure	4	FOI/4
Decision making process	2, 8, 9, 10	FOI/5
Public participation in the formulation of policy and performance of the Board's functions through consumer and industry representatives.	3	FOI/6
Documents held No charge – available outside FOI For purchase	11, 13	FOI/7a
Operation of FOI: How applications are dealt with	19	FOI/8