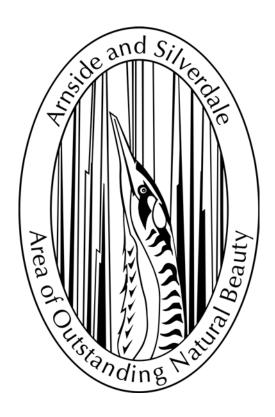
Bittern Countryside Community Interest Company

Business Plan Update 2010 - 2014

A plan to develop and strengthen the role of the Community Interest Company set up to work in and around the Arnside/Silverdale AONB



Date of Incorporation: 6th September 2006

Company Number: 6363720

Bittern Countryside Community Interest Company

Business Plan Update 2010-2014

(revised February 2010)

Synopsis

Purposes of a Community Interest Company for the AONB.

The AONB Executive supports the establishment of a Community Interest Company to work alongside the existing AONB Service and the AONB Landscape Trust, working out of the AONB Office. The AONB Officer's made the following recommendations for the format of an AONB Community Interest Company:

- The CIC for the AONB should be formed as a Company limited by share capital.
- The initial share capital will be restricted to an issue of £5,000 with each of the ten directors holding a maximum of 500 **management** shares valued at £1 per share.
- An additional ordinary share capital of £120,000 will be offered to members of the Asset Locked Body -(and other approved conservation bodies where a member is resident in the AONB) – the ordinary share capital will be divided into £10 shares.
- The Directors of the company will be appointed from the Conservation Organisations, community organisations and local people – the Directors may be representatives of bodies-corporate, registered charities or individuals.
- The registered address will be that of the AONB Unit Office and the AONB staff will facilitate the secretariat for the company during its formative period. In the longer term an independent company secretary would be appointed.
- the statutory "lock" on the assets and profits will limit the dividend payments on the shares of the company to be minimal in financial terms.
- The actions of the company would be directed by the Community Interest Statement, compliance with the annual Company reporting regulations and a required statement of compliance to the CIC Regulator.
- the "community interest test" includes:
 - carrying out environmental, landscape and habitat conservation and enhancement
 - ❖ facilitating community involvement and understanding of the environment
 - providing education and training in countryside management & sustainable development
 - producing, managing and marketing sustainable local products and/or produce
 - assisting voluntary and statutory bodies in delivering similar objectives
 - promoting renewable energy programmes and energy conservation initiatives
- an annual report has to be issued explaining how activities have benefited the community and how stakeholders have been involved in the work and organisation of the CIC
- An approved "asset locked body" which is to be the designated recipient of surplus
 assets and funds on being wound up usually a charitable body associated with the CIC
 or with similar aims and objectives is an essential feature of CICs.

In the case of the AONB this requirement is fulfilled by the Arnside and Silverdale AONB Landscape Trust, although other alternatives could be RSPB or National Trust, subject to the approval of the Regulator – although these bodies are National rather than local community groups based in or around the AONB.

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Activities of a Community Interest Company:

- 1. **Conservation Grazing**; Securing the long-term future of the Conservation Grazing both within and around the AONB area. The current situation has sufficient income to sustain the livelihood of the farmer carrying out the grazing regime through a mixture of sales of the animals or the organic status meat produced and the Single Farm Payment/Stewardship Payment regimes. However it doesn't generate the level of profit needed to make timely capital investments in facilities or equipment. This is a current problem and is not likely to change [who ever is carrying out the grazing regime]. The CIC could take on the infrastructure requirements of the grazing regime whilst employing/contracting suitable staff to carry out the grazing management. The CIC is likely to be able to access infrastructure funding on an ongoing basis and could also develop joint-use facilities to generate income to sustain less profitable activities.
- 2. Woodland Resources; Another area of activity for the CIC could be with woodland management within the AONB, taking the lead on the introduction of the infrastructure needed to provide woodfuel supplies from sustainably managed woodland resources. This would involve the CIC owning or leasing the equipment and organising woodland management/coppicing and brogging contracts and marketing the woodchip fuels produced, generating income to continue and develop the activities of the company.
- 3. **Vocational Training;** Provision of training opportunities in craft skills, working and co-ordinating community partnerships around the AONB to both develop and deliver courses and eventually qualifications in craft industries.

Other Recommendations:

Within the framework of the **Community Interest Statement** and **Memorandum and Articles of Association**, the activities that the CIC can engage are not constrained by local authority regulation or charitable status requirements. This would allow the adoption of entrepreneurial practices in the delivery of conservation objectives within and around the AONB. The Company is free to generate profits, provided that those profits are invested for the benefit of the community rather than the Directors and Shareholders of the Company.

The overall operating activities cannot be described just within the terms of the Community Interest Statement and the Company will need to develop and keep under review, a more comprehensive business plan. This document is that Business Plan and it presents a more concise guide to Company activities and provides focus for the efforts of both Directors and Members in taking the Company forward. The detailed business plan will also be a central tool in obtaining grant funding for the Company and be useful in raising awareness, particularly of the Community Interest Company business model and Social Enterprise in general.

The aims of the company are set out in Memorandum and Articles of Association, which will be a legally binding framework under which the Company will operate.

Principal objectives included in the Memorandum and Articles of Association are to:

- Manage and maintain infrastructure/equipment to ensure continuation of essential conservation grazing
- Play a lead role in the development of a sustainable woodfuel supply from under-managed woodland and scrub within and around the AONB
- Assist the delivery of statutory and voluntary management plans for the AONB or individual sites within and around the area
- Further develop community involvement & participation in the conservation and enhancement of the AONR
- Carry on other commercial and social activities, which fulfil the Company's 'Community Interest Statement'.

Background - Social Enterprise and Community Interest Companies.

Social enterprises are dynamic businesses with a social purpose working all around the UK and internationally to deliver lasting social and environmental change.

Well known social enterprises include <u>Cafedirect</u>, <u>The Big Issue</u>, <u>The Co-operative Group</u>, <u>Welsh Water (Glas Cymru)</u>, the <u>Eden Project</u> and <u>Jamie Oliver's Fifteen</u>, but there are many other social enterprises operating in a wide range of industries from farmers markets and recycling companies to transport providers and childcare.

The social enterprise sector is incredibly diverse, encompassing co-operatives, development trusts, community enterprises, housing associations, football supporter's trusts, Social Firms and leisure trusts, among others. As a result social enterprises use a wide variety of legal forms; some incorporated as companies while others take the form of industrial and provident societies. From July 2005 social enterprises have also been able to register as Community Interest Companies.

Recent data published by the Small Business Service suggests that there are more than 15,000 social enterprises in the UK, employing nearly half a million people with a combined turnover of £18bn. A report for HM Government's Social Enterprise Unit suggests there may be more than 5,000 social enterprises in the UK which are earning at least half of their income from trading goods and services.

Crucially, social enterprises compete in the marketplace like any other business, but they use their business skills to achieve social aims. Social enterprises are part of the broader social economy, but whereas many voluntary organisations and community groups may be involved in some kind of trading activity for goods and services, social enterprises see trading as a significant and defining part of their business. Although some commentators like to use the term 'non-profit' when referring to social enterprises, this is misleading. Social enterprises aim to sustain their business and make profits – it is what they do with these profits that is different.

The government's official definition of social enterprise, contained within its 'Strategy for Success' document published in 2002, helps to explain this. It says:

"A social enterprise is a business with primarily social objectives whose surpluses are principally reinvested for that purpose in the business or in the community, rather than being driven by the need to maximise profit for shareholders and owners."

Social enterprises have been around in all but name for many years, stretching back to as long ago as 1844. This date marks the moment when, suffering at the hands of exploitative factory owners and shopkeepers who charged extortionate prices, 28 working men in Rochdale scraped together £28 to open their own shop – so heralding the beginning of the modern co-op movement.

Useful links - Social Enterprise & Community Interest Companies:

Information is available from the CIC Regulators website at www.cicregulator.gov.uk

General Social Enterprise information can be found at www.socialenterprise.org.uk

Government Social Enterprise Unit website is www.dti.gov.uk/socialenterprise

Company Registration and general corporate governance from www.companieshouse.gov.uk

Bittern Countryside Community Interest Company



Business Plan 2008-2012

Introduction

- 1. The Bittern Countryside Community Interest Company formed as an incorporated body during September 2007. Its creation is the result of efforts by officers responsible for the Arnside/Silverdale AONB and others who believed it was essential to establish a social enterprise to help the AONB Service and other Conservation bodies deliver many elements of the statutory Management Plan for the AONB.
- 2. The AONB Service has worked hard to establish the Community Interest Company during 2006/7. The AONB Executive Committee endorsed the proposal to establish the CIC in January 2006 agreeing that the AONB Service should be the lead in developing this new initiative.
- 3. Initially the aim was for the CIC to draw its Directors from the various active Conservation Organisations in the AONB, there were a number of difficulties in progressing in this way, especially concerning potential conflicts of interest for named Directors who were representing charitable bodies or local authorities/government agencies.
- 4. Consequent to note 3 above, the founding Directors recruited a number of sympathetic individuals, willing to be the Directors of the Company and take a stake in the company share capital at the outset.
- 5. This Business Plan is to be kept under review, and updated, amended and approved by the Board of Directors. The original plan was put forward for endorsement by the first AGM of the Company. This updated Business Plan will be used to guide the work undertaken over the years 2010-2014.

- 6. An important objective over the period of the Plan is to establish the Company as an organisation which can deliver sustainable management practise and benefit from its status of a Limited Company. This legal identity gives it a firm legal footing from which to trade and enable the Company to negotiate in its own right with other bodies.
- 7. The Business Plan 2010-2014 will be the basis, along with the Company's Memorandum and Articles of Association, on which funding applications will be made to statutory and non-statutory funding bodies.
- 8. The challenge over the years covered by this Business Plan, will be to establish and sustain a high profile and progress the Company in all areas of activity, so as to ensure compliance with our adopted Community Interest Statement.
- 9. The Business Plan sets out in broad terms what the Company wishes to achieve over the next five years and how it hopes to realise those ambitions. (It is not a detailed work plan. Such a document will be prepared and approved by the Directors as they may think fit when necessary for any budget setting process or to assist with applications for funding by the Company.)
- 10. The audience for the Plan is primarily members of the Company, but it is also intended to be useful to prospective investors, partner organisations, and others interested in joining or supporting the Company as well as potential sponsors within local authorities and national agencies.
- 11.It should also be helpful to anyone wishing to understand the role and purpose of the Company.
- 12. All the proposals in this Plan are conditional on the Company being able to attract and maintain funding.

Vision and Aims

- 13. The Company will work in close co-operation with the Arnside and Silverdale AONB Partnership, seeking to complement the activities of all existing statutory and nonstatutory organisations, which have responsibilities concerning managing landscape, habitats, heritage and or cultural features. It will also seek to set up working relationships with any such bodies yet to be established. Additionally, the Company will seek to involve a wide community in conservation work and promote with the local communities within the AONB a more sustainable future.
- 14. The long term vision for the Company is that it should be a robust organisation, operating at both a local and regional level, delivering solutions to enhance and conserve the natural beauty of the Arnside and Silverdale Area of Outstanding Natural Beauty and surrounding countryside, involving all sectors of the local community in those solutions and all those responsible for or with an interest in the management of protected landscapes areas and other areas of important countryside.
- 15. To achieve this, the Company will work closely with the Arnside and Silverdale AONB Unit and with officers of the following bodies: The Arnside and Silverdale AONB Landscape Trust, The Royal Society for the Protection of Birds, The National Trust, The Forestry Commission -England, The Wildlife Trusts for Cumbria and Lancashire, Cumbria and Lancashire County Councils, Lancaster City Council and South Lakeland District Council and the National Association of AONBs.
- 16. In the medium term covered by this Business Plan, the aim is to reinforce the impact the Company makes on behalf of the AONB so that there is better implementation, delivery, awareness, understanding and recognition of countryside management within the local community and more widely among decision makers in both public and private sectors.

17.In the short term the emphasis will be on establishing and strengthening the structure of the organisation so that it can effectively deliver countryside management and environmental services of all kinds and exploit opportunities available through changes to agricultural funding and government structures for dealing with the rural environment of the AONB.

18. Over the next three years we will:

- Expand the internal network amongst members so that they are well informed about matters affecting the Company and the AONB, ensuring all are able to share knowledge and experience in an efficient and simple manner.
- Develop a broad share-holding membership both among the local communities of the AONB / surrounding areas and among partner organisations, other bodies corporate and local authorities.
- Strengthen the structure of the organisation so that it can deliver all the activities to achieve its vision. The emphasis will be on:
 - Firmly establishing the Board of Directors and any operating working groups/contracts.
 - Providing strong support to the AONB unit through an action and work programme
 - Seeking additional funding to support staff, consultants and / or volunteers to provide local co-ordination of all areas of work proposed for the Company.
- Work closely with other bodies, groups and agencies to strengthen countryside management work and achieve best practice in support of the purpose for designating the AONB, wherever possible working in partnership with other bodies with similar objectives.
- Maintain contacts with other similar organisations and with social enterprise organisations more generally in the UK and Europe to enable co-operative action where appropriate.

19. The work of the Company is set out under ten headings in this Business plan:

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In reality all of the areas of work overlap and are interrelated. The divisions have been created to meet the needs of funding bodies, which need to be able to cross reference grants to specific outputs, as well as enable the Company to account for its activities and achievements.

Countryside Management Activities

- 20. This section of the Plan sets out the outline strategy for ensuring that the Company effectively delivers improvements and new areas of work in countryside management, working with members of the Company, as well as with local people, land owners and organisations, local government, regional and national agencies. Developing a more detailed working plan and framework is one of the actions.
- 21. If the Company is to achieve its objectives, it is essential that it makes the best use of the financial resources available to it for delivery of work, either from income generated, grants and donations received or capital raised through share issues, setting out work programmes and action plans in a targeted and controlled manner.
- 22. Our corporate strategy cannot realistically be drafted so as to cover all the proposed activities of the Company - ranging from conservation grazing to community interpretation events. However it should be possible to produce work programmes that address individual areas of activity as the Company's capacity to deliver develops over time.

23. For the purposes of this Plan, the priority activites of the company are divided into broad actions and methods of delivery are identified for each area of work so far as is possible to anticipate at the present time.

Actions

- 24. Develop a targeted action plan and identify resource requirements and opportunities for priority objectives set out below in paras 25 29.
- 25.Establish at the earliest opportunity, a conservation grazing working group with a priority task of producing a detailed but simple work programme and funding bid for the delivery of such work within one year. This will involve negotiation with existing graziers, farmers, landowners and conservation bodies as well as developing funding bids to carry forward any such work proposed.
- 26.Establish a working group of Directors and other interested partners to investigate the establishment of a woodfuel supply unit as part of the Community Interest Company business. Seek funding to establish an AONB Woodlands Officer to provide proactive contact with woodland owners and managers and actual and potential woodfuel consumers.
- 27. Explore opportunities to promote, market and produce local woodland products either with other trading partners or independently.
- 28.Identify suitable land for purchase, leasing etc to promote conservation/protective ownership of important sites in and around the AONB. Enter negotiations for purchasing suitable sites, identify appropriate uses for the sites in the ownership/care and set up management regimes to deliver appropriate conservation and business objectives for each site. Prioritise for haymeadow and candidate haymeadow sites
- 29. Set up suitable green supply/service operations as appropriate within and around the AONB eg. Green composting, green burial/ashes meadow etc.

Other relevant Company activity

- 30. Develop a publishing role for the Company, taking over those publications which the AONB Service or AONB Landscape Trust are unable to continue with. Identify opportunities to expand the range of AONB publications; commission, write, print and publish a variety of books and leaflets on themes associated with the AONB; including Environmental conservation, Countryside Management, Wildlife, Local History, Geology, Travel, Recreation, Landscape, Cultural Heritage and local Communities.
- 31. Promote and encourage "One Planet Living", Sustainable Development opportunities and Fair Trade principles within the communities in and around the AONB. Investigate opportunities to develop, install and maintain sustainable development infrastructure within premises used or services provided by the Company, such as renewable energy technology or bio-fuel production.
- 32.Investigate opportunities for establishing premises and or work sites within the AONB, suitable for the Company to base any of the activities identified above, either independently or through establishing or working with other partnerships or setting up separate holding companies and or co-operative bodies.
- 33. Establish an active group within the Company to support and advise local community groups and others to help them develop and deliver projects, which broadly support the objectives of the Company and the AONB Unit. The group could provide advice on funding opportunities, project delivery, joint marketing and capacity building.

Actions

34. Establish a volunteer funding advisors group, using the licenced GRANTfinder software to deliver funding advise to local community groups and small businesses. Volunteers should be CIC shareholders, so as to ensure they are acting within the limited liability of the Company.

35.Organise a series of local funding advisory surgeries and publicise the availability of funding advice within the AONB. Monitor take up of service and success rate of applicants to review the viability of GRANTfinder provision within the AONB. Identify external funding for continued subscription should this be considered desirable in light of such a review.

Community Participation

- 36. This section of the Plan sets out the outline strategy for ensuring that the Company generates effective and inclusive Community Participation, within the Company's membership and more broadly within the Communities of the AONB and its surrounding area.
- 37. The Company will make the best use of the resources available to it for publicity and communications in a targeted and controlled way, using local media to recruit volunteers. The Company will work with existing volunteer groups and other partner organisations to expand volunteer opportunities within the AONB.

Actions

- 38. Formally establish a volunteer working group. Volunteers may be recruited as shareholders, although it is anticipated that Volunteers will be drawn from the community at large.
- 39. Develop and reinforce the shareholder membership to strengthen support for the Company financially and practically, to ensure future sustainability for the CIC.

Contract Management

- 40. The Company will seek to promote Sustainability and Fairtrade in all contracts it establishes irrespective of the activities/work to be undertaken.
- 41. The Company will not generally enter competitive bids for contracts or issue contracts itself, where such bids would be below local market rates thereby undercutting existing businesses within the AONB. However the Company will seek to support local services, craftsmen/women, contractors and consultants in preference to regional, national or international suppliers to achieve its objectives.

Communications

- 42. This section of the Plan sets out the outline strategy for ensuring that the Company communicates effectively, with members as well as with people and organisations the Company wishes to influence.
- 43. Company will generate media and press communications, which are targeted with primary audiences ranging from shareholders and partners (such as local authorities) to the general public.
- 44. For the purposes of this Plan, the audience the Company needs to reach can be divided into Internal and External. The former being those people associated with the shareholding membership and partner organisations and the latter associated with local communities and the general public. In many cases the messages we need to get across are the same, although the techniques to get our message across may be different.
- 45.All members of the Company have a right to expect regular reports and information, not only to keep them informed of the Company's activities on their behalf, but also to ensure that the Company is fulfilling the requirements of our adopted community interest statement. It is also important that members are offered the opportunity to contribute to the messages the Company publishes for the external audience.

Actions

- 46. The Company will produce regular Newsletters in a simple electronic format, which will be circulated by email, to members of the Company (Directors & working group members and Shareholders) It will also be available to our Partner Organisations, other AONB units and some other national organisation contacts). Members wishing to receive hard copy will be able to do so on request to Company and may be charged a small fee.
- 47. Set up and maintain a Web site as an interactive facility, which will include records of all meetings and activities carried out on the Company's behalf, a bulletin board where members can exchange information, and a technical section where members of the Company and AONB Staff will be able to obtain access to up-to-date reports and information relevant to the management of the Company. Opportunities for e-commerce should be investigated and trading partners approached, with sales online generating a percentage commission for the Company being investigated.
- 48. Investigate the opportunities to produce a magazine or booklet at regular intervals, featuring articles of general interest to a wide audience of both members and non-members seeking to press home the key messages to further the Company's objectives.
- 49. Work closely with specialist communication staff in partner organisations to develop effective public relations at regional and local level.
- 50. The Company will develop strong communications networks between shareholding members and Company Volunteers so that they can easily share knowledge and experience
- 51. Establish a communications group with a priority task of investigating the supply of press or communications services or opportunities to appoint a communications officer. Identify alternative means of marketing and promoting the Company in the short to medium term to all external audiences.

52. Produce a general leaflet, which explains the importance of the Arnside/Silverdale AONB and the special role that the Company's members can have in helping with the management of the area.

Corporate Liaison

- 53. The Company's activities in terms of co-operating and developing corporate relationships will be prioritised on establishing links with social enterprises, charitable bodies and companies and other not-for-profit bodies, which have broadly similar aims, to exchange information, share best practise and develop joint projects.
- 54. In addition the Company will identify those companies who show an interest in AONB issues in their business and provide advice and support to them when appropriate. This will be more effective than trying to maintain a wide-ranging liaison effort in an attempt to reach all companies and businesses active within and around the AONB.

Actions

- 55. Provide practical support to the AONB Service and other conservation bodies. The Company will also seek to act as an advocate for community interests within the Area and take part in meetings held by other bodies as may be appropriate.
- 56. Seek regular meetings with partners and other business representatives within the Area. The Company will normally be represented by the Chairman and another Director plus up to three other members of the Company with experience relevant to the subject matter of the meeting.

Employment and Training

57. The Company will seek to increase local employment opportunities, in relation to its aims and objectives. It will give priority to projects and work which will benefit local people and offer employment/training and personal development opportunities to people who are resident within the AONB and its surrounding rural and urban communities.

58. The Company will work with other relevant partners to ensure that training offered or facilitated by the Company is relevant to the needs of the local community and offers certification and nationally recognised qualifications where appropriate.

Policy Development

- 59. The Company wishes to be a major contributor to any discussions about initiatives, which affect the AONB and/or its surrounding area, so that individuals can become fully involved at a local level in the delivery of practical action.
- 60. The Directors will develop policy for the Company in line with the Memorandum and Articles of Association and ensure compliance with the Community Interest Statement. The shareholding membership will take part in policy development through debate at General Meetings and at other times using electronic or other consultation methods at the discretion of the Directors.

Support to Members

- 61. The Company will establish a shareholding membership body and will provide information, advice and assistance to members regarding matters relevant to and in support of the Aims and Objectives of the Company.
- 62. The Company will invite members to provide details of any special interests or expertise they possess and maintain a database of the expertise of members so that the Company can call upon the membership for support and also facilitate contact between members with common interests.
- 63. The Company will maximise its use of electronic methods for distributing information to members but these will be reinforced by more conventional methods including leaflets, newsletters, seminars, workshops and the annual general meeting.

64. The priority for the Company is to ensure suitable organisational arrangements are in place to maintain confidence in the Company and also that they can be effectively maintained by the Directors and the members who might become involved in the work of the Company. In some cases this will depend on the ability of the Company to fund employment of staff or set up contracts to provide professional support to the Directors.

Governance and Administration

- 65. The Directors will set up sub-committees of the Board to fulfil specialist functions and oversee any projects run by the Company. These sub-committees will develop the detail of Company thinking and will involve Directors, AONB staff and others, in order to ensure relevant expertise is available to the specialist committees. They will work closely with the Directors and any staff of the Company. The initial groups established should include:
 - Finance and Governance
 - Conservation Grazing Programme
 - Woodfuel Supply operation
- 66. These sub-groups will be supplemented by short-term task groups where appropriate.
- 67. The organisation of the Company in its formative years is unlikely to be able to deliver all the action points set out in this plan. Increasing capacity in terms of additional Directors will not address this issue. It is likely that delivery of many of the actions set out in this plan will require the employment of staff, secondment of officers from the AONB Partnership or the appointment of contractors/consultants working to detailed contract specifications and agreements.
- 68. The Directors may seek to negotiate support "agency" arrangements with partner organisations for the employment of staff and administration of the Company's affairs. The Directors may also establish arrangements for the Company to take control for its administration, terms and conditions of service and employing staff directly, in the event of such "agency" arrangements being terminated.

Action

- 69. The Directors will keep under review the staffing needed to deliver the Plan. It will actively seek the resources to implement its business plan objectives through the preferred structure of the appointment of a Managing Director. This post might well combine responsibility for project work and executive responsibilities for the Company's affairs.
- 70. Administrative support the Company Secretary will work with other Directors, staff and partners to ensure the effective administration of the Company and fulfil all statutory requirements etc.
- 71. Develop clear lines of communication and responsibility between the various parts of the Company including the Directors, working groups, Company members and staff.
- 72. The Company will seek to work with other organisations with similar interests wherever possible in partnership, to achieve maximum impact from its activities and available resources.
- 73. The Company will encourage all members to play an active role in the delivery of the objectives set out in the Plan.

Funding and Resources

- 74. During the period of this Plan, the Company will be dependent on funding from four potential sources; the membership share-issue, grants from the partner organisations, grants, loans and donations from funding bodies and individuals, and income from trading activity.
- 75. The Company, as a CIC incorporated body, should benefit from easier access to grants from a number of public organisations, which would not be available to normal commercial bodies. This would include grants from Regional Government Offices and Rural Development Agencies.

- 76. Initially the operating capital of the Company will be largely dependent on the success or otherwise of the share issue.
- 77. It is unlikely that future operational finance will be raised through ongoing further share issues, though the opportunity to increase the authorised share capital of the company will be explored should the issue of the current share capital become fully allocated.

Action

- 78. Carry out regular membership drives to ensure the share capital is fully allocated within the Business Plan period.
- 79. Explore possible financial support from regional, national and international funding sources
- 80. Investigate opportunities for sponsorship of specific projects and/or events by private organisations, in a way that does not compromise the Company's ability to comply with the Community Interest Statement.

David Askew Finance Director February 2010