Registered Charity No. 247558

# THE RICHARD DIMBLEBY CANCER FUND

**Report and Financial Statements** 

31 July 2020

# **REPORT AND FINANCIAL STATEMENTS YEAR ENDED 31 JULY 2020**

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# **REPORT AND FINANCIAL STATEMENTS YEAR ENDED 31 JULY 2020**

# **REFERENCE AND ADMINISTRATIVE INFORMATION**

# TRUSTEES

Chairman

Jonathan Dimbleby Kitty Dimbleby Jo Ralling Hamish Sinclair Kyle Taylor Helen Boaden Liz Price Alistair Lockhart Caroline Waldegrave OBE Charles Hunt Joseph Dimbleby David Dimbleby

Appointed March 2020 Resigned June 2020 Resigned November 2019 Resigned November 2019 Resigned November 2019 Resigned November 2019

# BANKERS

National Westminster Bank PLC PO Box No. 35 10 Southwark Street London SE1 1TT

# SOLICITORS

Devonshires Salisbury House London Wall EC2M 5QY

# **INVESTMENT MANAGERS**

Cazenove Capital Management 12 Moorgate London EC2R 6DA

# AUDITOR

KPMG LLP Chartered Accountants & Registered Auditor 15 Canada Square London E14 5GL

# **TRUSTEES' REPORT**

The Trustees present their report along with the financial statements of the charity for the year ended 31 July 2020. The financial statements have been prepared in accordance with the accounting policies set out in note 1 to the accounts and comply with the charity's trust deed, the Statement of Recommended Practice "Accounting and Reporting by Charities" (FRS102) issued in January 2015 and applicable accounting standards.

# Objectives and activities

The Trust was created by a Trust Deed in England dated 23 March 1966 and exists for the purpose of supporting people with cancer and their carers, as well as funding research into cancer treatment and palliative and supportive care: put simply, to help make life better for people living with cancer. The Trust Deed provides for a minimum of three trustees. The power to appoint new trustees is vested in the surviving or continuing trustees.

The Board has four main aims: -

- 1. To increase our reach on supporting people living with cancer
- 2. To remain at the heart of the future of cancer services at Guy's & St Thomas' NHS Foundation Trust
- 3. To maintain our expenditure on our national cancer care research programme
- 4. To continue to provide extra funds on occasion to the endowment of the Richard Dimbleby Chair of Cancer Research in the Dimbleby Laboratories at King's College London

The trustees confirm that they have referred to the guidance contained in the Charity Commission's general guidance on public benefit when reviewing the Trust's aims and objectives and in planning future activities and setting the grant making policy for the year.

From 1 August 2019, the charity focussed its work full-time on the growth and development of Cancer Care Map, having given over the fundraising arm and the Dimbleby Cancer Care name to Guy's and St Thomas' Charity as part of a Major Gift on 31 July 2019.

Robin Pritchard continued in his full-time role of charity Director, alongside Paula Hargadon who stepped into the role of Co-Director (4 days per week).

Lois Jacobs continued in her part-time role (20 hours/4 days per week), with a full focus as Content Coordinator on Cancer Care Map.

Kate Bolton continued in her role as Content Co-ordinator (2.5 days per week) initially as a contractor, and then coming on staff for a period of time from October 2019 until July 2020. Kate gave her resignation in June 2020, leaving her role on 31 July 2020.

David Allen continued to oversee the social media accounts for the charity on a monthly retainer. In February 2020 we increased his hours to 4 days per month and he took over the content generation for the Cancer Care Map blog page.

The Board has remained committed to continuing to raise the public profile of the charity, but has moved away from fundraising events to focus instead on other revenue streams including Trusts and Grant applications.

The Dimbleby Cancer Care Research Fund remains on hold at this time with two projects still remaining outstanding which are due to close in 2021.

The Advisory Board remains in place and continues to advise on matters arising including current research projects still in progress and the development of Cancer Care Map.

The charity engaged once again with the Intern programme at the Foundation of International Education and also The Intern Group to host overseas Interns throughout the year to assist with Cancer Care Map which proved very successful. During the COVID-19 lockdown of 2020 the Intern placements were halted, but we were able to trial a 'virtual placement' with a candidate working with us remotely from California.

The charity continues to operate from office space at Guy's Hospital provided pro bono by Kings College London in recognition of the charity's long-standing relationship with Guy's and St Thomas' Trust, although from 16 March 2020 all staff have been working remotely from home.

# Achievements & Performance

The partnership with Quintessentially Foundation came to an end in September 2019 with a final Quiz night, hosted at Annabel's in Mayfair, raising in excess of £137k with a percentage of proceeds going to Dimbleby Cancer Care at Guy's and St Thomas' Charity.

In December 2019, we hosted a final Carols by Candlelight at St Mary Magdalen in Bermondsey. The event attracted over 250 guests with a percentage of proceeds going to Dimbleby Cancer Care at Guy's and St Thomas' Charity.

No other formal fundraising events were untaken.

We continued to engage the services of Michael Kay of funding applications through Trusts and Foundations on a commission only basis. At the end of the financial year at 31 July 2020 grants to the value of £27,500 had been achieved through Michael Kay's applications.

# **Financial Review**

The decision was taken by Trustees in March 2019 to partner with Guy's and St Thomas' Trust and Guy's and St Thomas' Charity. The Richard Dimbleby Cancer Fund made a Major Gift to Guy's and St Thomas' Charity in return for which Guy's and St Thomas' Charity agreed to continue funding the Dimbleby Cancer Care services at Guy's and St Thomas' Trust as well as taking over the fundraising operation for Dimbleby Cancer Care. Trustees agreed to gift the name and brand of 'Dimbleby Cancer Care' to enable Guy's and St Thomas' Charity to maximise the fundraising potential. The Major Gift of £200,000 was made to Guy's and St Thomas' Charity on 31 July 2019 with a timetable drawn up to transition the brand and name and fundraising operation in the first half of 2019/20.

Having gifted the working brand name of 'Dimbleby Cancer Care' to Guy's and St Thomas' Charity, Trustees agreed to continue working under the working charity name of 'Cancer Care Map' retaining the registered charity number 247558 of the Richard Dimbleby Cancer Fund and the core team of Robin Pritchard, Paula Hargadon and Lois Jacobs to grow and develop the work of Cancer Care Map, which they have done successfully in 2019/20 despite the challenges of COVID-19.

As part of the decision taken in March 2019, all funds were withdrawn from the portfolio managed by Cazenove Capital Management. The funds were transferred to the Cazenove cash reserve. Hamish Sinclair continues in his role of Honorary Treasurer, working closely with Paula Hargadon and the Cazenove Account team.

# Plans for Future Periods

Over the financial year 2019/20, The Richard Dimbleby Cancer Fund has successfully continued to develop Cancer Care Map, predominantly through its work with NHS England and the Cancer Alliances. In November 2019, Cancer Care Map began working with AND Digital who approached the charity with the offer to build a new platform for the Cancer Care Map site on a fully pro bono basis. Work began in earnest in December 2019. Due to COVID-19 the work was paused from April to July 2020 as the team were placed on furlough. However, work has now restarted with the launch the new site due in 2020/21.

The Richard Dimbleby Cancer Fund have been successful in the securing of grants from a number of Trusts and Foundations, and ongoing discussions with NHS England around longer term financial collaboration are very positive. This, coupled with the growth of the support database represented on the map and the increased traffic to the site, show that Cancer Care Map is now positioned as a key sign-posting resource for anyone facing cancer in the UK today.

# Structure, governance and management

See Objective and Activities, above.

The Board of Trustees has met four times a year to date. The Director reports to the Chairman and Deputy Chairman on a regular basis.

Annual staff appraisals (including salary reviews) are carried out by the Chairman and Director at the beginning of the year.

The charity remains bound and informed by GDPR legislation. The Board remains vigilant to possible risks and remain confident that the charity is not exposed currently to any that require action at this stage.

Approved and signed on behalf of the Trustees on 23 February 2021

DocuSigned I Jonathan Dimbleby 6089846009934BC...



## Statement of Trustees' responsibilities in respect of the Trustees' annual report and the financial statements

Under charity law, the trustees are responsible for preparing a Trustees' Annual Report and financial statements for each financial year which show a true and fair view of the state of affairs of the charity and of the excess of expenditure over income for that period. The trustees have elected to prepare the financial statements in accordance with UK Accounting Standards, including FRS 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland*.

In preparing these financial statements, generally accepted accounting practice entails that the trustees:

- select suitable accounting policies and then apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- state whether the recommendations of the Statement of Recommended Practice have been followed, subject to any material departures disclosed and explained in the financial statements;
- state whether the financial statements comply with the trust deed, subject to any material departures disclosed and explained in the financial statements;
- assess the charity's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and
- use the going concern basis of accounting unless they either intend to liquidate the charity or to cease operations, or have no realistic alternative but to do so.

The trustees are required to act in accordance with the trust deed of the charity, within the framework of trust law. They are responsible for keeping proper accounting records, sufficient to disclose at any time, with reasonable accuracy, the financial position of the charity at that time, and to enable the trustees to ensure that, where any statements of accounts are prepared by them under section 132(1) of the Charities Act 2011, those statements of accounts comply with the requirements of regulations under that provision. They are responsible for such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error, and have general responsibility for taking such steps as are reasonably open to them to safeguard the assets of the charity and to prevent and detect fraud and other irregularities.

# Independent auditor's report to the Trustees of The Richard Dimbleby Cancer Fund

# Opinion

We have audited the financial statements of The Richard Dimbleby Cancer Fund ("the charity") for the year ended 31<sup>st</sup> July 2020 which comprise the Statement of Financial Activities, Balance Sheet, Cash Flow Statement and related notes, including the accounting policies in note 1.

In our opinion the financial statements:

- give a true and fair view of the state of the charity's affairs as at 31<sup>st</sup> July 2020 and of its incoming resources and application of resources for the year then ended;
- have been properly prepared in accordance with UK accounting standards, including FRS 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland*; and
- have been properly prepared in accordance with the requirements of the Charities Act 2011.

# **Basis for opinion**

We have been appointed as auditor under section 145 of the Charities Act 2011 (or its predecessors) and report in accordance with regulations made under section 154 of that Act.

We conducted our audit in accordance with International Standards on Auditing (UK) ("ISAs (UK)") and applicable law. Our responsibilities are described below. We have fulfilled our ethical responsibilities under, and are independent of the charity in accordance with, UK ethical requirements including the FRC Ethical Standard. We believe that the audit evidence we have obtained is a sufficient and appropriate basis for our opinion.

# **Going concern**

The trustees have prepared the financial statements on the going concern basis as they do not intend to liquidate the charity or to cease its operations, and as they have concluded that the charity's financial position means that this is realistic. They have also concluded that there are no material uncertainties that could have cast significant doubt over its ability to continue as a going concern for at least a year from the date of approval of the financial statements ("the going concern period").

We are required to report to you if we have concluded that the use of the going concern basis of accounting is inappropriate or there is an undisclosed material uncertainty that may cast significant doubt over the use of that basis for a period of at least a year from the date of approval of the financial statements. In our evaluation of the trustees' conclusions, we considered the inherent risks to the charity's business model and analysed how those risks might affect the charity's financial resources or ability to continue operations over the going concern period. We have nothing to report in these respects.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the absence of reference to a material uncertainty in this auditor's report is not a guarantee that the charity will continue in operation.

# **Other information**

The trustees are responsible for the other information, which comprises the Trustees' Report. Our opinion on the financial statements does not cover the other information and, accordingly, we do not express an audit opinion or, except as explicitly stated below, any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. We are required to report to you if:

- based solely on that work, we have identified material misstatements in the other information; or
- in our opinion, the information given in the Trustees' Report is inconsistent in any material respect with the financial statements.

We have nothing to report in these respects.

# Matters on which we are required to report by exception

Under the Charities Act 2011 we are required to report to you if, in our opinion:

- the charity has not kept sufficient accounting records; or
- the financial statements are not in agreement with the accounting records; or
- we have not received all the information and explanations we require for our audit.

We have nothing to report in these respects.

# Trustees' responsibilities

As explained more fully in their statement set out on page 4, the trustees are responsible for: the preparation of financial statements which give a true and fair view; such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; assessing the charity's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the charity or to cease operations, or have no realistic alternative but to do so.

# Auditor's responsibilities

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue our opinion in an auditor's report. Reasonable assurance is a high level of assurance, but does not guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

A fuller description of our responsibilities is provided on the FRC's website at www.frc.org.uk/auditorsresponsibilities.

# The purpose of our audit work and to whom we owe our responsibilities

This report is made solely to the charity's trustees as a body, in accordance with section 145 of the Charities Act 2011 (or its predecessors) and regulations made under section 154 of that Act. Our audit work has been undertaken so that we might state to the charity's trustees those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the charity and its trustees as a body, for our audit work, for this report, or for the opinions we have formed.

# Thur Nitleour

Fleur Nieboer for and on behalf of KPMG LLP, Statutory Auditor *Chartered Accountants* 15 Canada Square London E14 5GL 26 February 2021

KPMG LLP is eligible to act as an auditor in terms of section 1212 of the Companies Act 200

# STATEMENT OF FINANCIAL ACTIVITIES Year ended 31 July 2020

		Total	Unrestricted Funds 2020	Total Unrest	tricted Funds 2019
Income and Endowments	Note	£	£	£	£
Donations and legacies Events Investment income <b>Total income</b>	2	-	57,816 145,414 13 203,243		03,632 88,294 3,726 95,652
Expenditure					
Costs of raising funds	3	32,203		153,787	
Charitable activities	4	196,774		361,689	
Total expenditure	_		(228,977)	(5	15,476)
Net expenditure and net movement in funds before gains and losses on investments		-	(25,734)	(3	19,824)
Net (loss)/gain on investments			(298)		(3,653)
Net movement in funds		-	(26,032)	(3)	23,477)
Total funds brought forward at 1 August			160,644	4	84,121
Total Funds carried forward at 31 July		-	134,612	1	60,644

All results are derived from continuing activities. The Trust has no gains or losses other than those recognised in the SOFA.

#### BALANCE SHEET As at 31 July 2020

As at 51 July 2020	Note	£	2020 £	£	2019 £
Fixed Assets Investments	7		99,261		141,651
<b>Current Assets</b> Debtors Cash at bank and in hand	8	1,678 94,528		4,429 53,731	
Creditors: amounts falling due within one year	9	96,206 (60,855)		58,160 (39,167)	
Net Current assets			35,351		18,993
Total Assets Less Current Liabilities			134,612		160,644
Creditors: amounts falling due after more than one year			-		-
Net Assets			134,612	=	160,644
REPRESENTED BY:					
FUNDS Unrestricted funds		_	134,612	_	160,644

The notes on pages 10 to 13 form part of the financial statements.

Approved by the Trustees on and signed on their behalf

23 February 2021

Hamish Sinclair Hon. Treasurer



Jonathan Dimbleby Chairman

DocuSigned by: Jonathan Dimbleby 6089846009934BC...

# CASH FLOW STATEMENT Year ended 31 July 2020

Tear chied 51 5 dry 2020	Note	2020 £	2019 £
Net cash used in operating activities	10	(3,457)	(360,241)
<b>Cash flows from investing activities</b> Interest and dividends		2,162	6,394
Net cash provided by investing activities		(1,295)	(353,847)
Cash flows from financing activities Payments to acquire investments Proceeds from sales of investments (Increase)/decrease in cash awaiting investment		(97,000) 140,353 (1,261)	(474,168) 822,359 (1,000)
Change in cash and cash equivalents in the year		40,797	(6,656)
Cash and cash equivalent brought forward		53,731	60,387
Cash and cash equivalents carried forward		94,528	53,731

## NOTES TO THE ACCOUNTS Year ended 31 July 2020

#### 1. ACCOUNTING POLICIES

The Financial and Reporting statements are prepared in accordance with the Statement of Recommended Practice "Accounting and Reporting by Charities" (FRS 102) issued in January 2015 and applicable accounting standards. The Principal Trustees of Richard Dimbleby Cancer Fund meets the definition of a public benefit entity under FRS 102.

The financial statements have been prepared on a going concern basis as the Trustees consider to be appropriate for the for the following reasons.

The Trustees have reviewed the cash flow forecasts for a period of at least twelve months from the date of approval of these financial statements, which indicate that the charity will have sufficient funds, to meet its liabilities as they fall due for that period. The Trustees have also considered the implications of COVID-19 on these cash flow forecasts.

Consequently, the Trustees are confident that the charity will have sufficient funds to continue to meet its liabilities as they fall due for at least twelve months from the date of approval of the financial statements and therefore have prepared the financial statements on a going concern basis.

#### Fund accounting

All funds are unrestricted and represent income which is expendable at the discretion of the Trustees in the furtherance of the objectives of the charity. Such funds may be held in order to finance both working capital and capital investment.

#### Income recognition

All income is recognised once the charity has entitlement to the income, it is probable that the income will be received and the amount of income receivable can be measured reliably.

Donations are recognised when the charity has been notified in writing of both the amount and settlement date. In the event that a donation is subject to conditions that require a level of performance before the charity is entitled to the funds, the income is deferred and not recognised until either of those conditions are fully met, or the fulfilment of those conditions is wholly within the control of the charity and it is probable that those conditions will be fulfilled in the reporting period.

Legacy gifts are recognised on a case by case basis following the granting of probate where the administrator/executor for the estate has communicated in writing both the amount and the settlement date. In the event that the gift is in the form of an asset other than cash or a financial asset traded on a recognised stock exchange, recognition is subject to the value of the gift being reliably measurable with a degree of reasonable accuracy and the title to the asset having been transferred to the charity.

Event income is recognised upon receipt of the funds.

Interest on funds held on deposit is included when receivable and the amount can be measured reliably by the charity; this is normally upon notification of the interest paid or payable by the bank. Dividends are recognised once the dividend has been declared. This is normally upon notification from the fund managers of the dividend due.

#### **Resources expended**

Liabilities are recognised as resources expended as soon as there is a legal or constructive obligation committing the charity to the expenditure, it is probable that settlement will be required and the amount of the obligation can be measured reliably.

All expenditure is accounted for on an accrual basis. All expenses including support costs and governance costs are allocated or apportioned to the applicable expenditure headings.

Grants payable are payments made to third parties in the furtherance of the charitable objectives of the charity. In the case of unconditional grant offer this is accrued once the recipient has been notified of the grant award. The notification gives the recipient a reasonable expectation that they will receive the one-year or multi-year grant. Grants awarded that are subject to the recipient fulfilling performance conditions are only accrued when the recipient has been notified of the grant and any remaining unfulfilled condition attaching to that grant is outside of the control of the charity.

## Allocation of support and governance costs

Support costs have been allocated between governance costs and other support costs. Governance costs comprise all costs involving the public accountability of the charity and its compliance with regulation and good practice. These costs include costs related to statutory audit and legal fees.

Governance costs and support costs have been apportioned between fundraising and charitable activities on the basis of the activities undertaken by the staff. The allocation of support and governance costs is analysed in note 5.

## NOTES TO THE ACCOUNTS Year ended 31 July 2020

#### Costs of raising funds

Costs of generating funds relate to investment managers fees and expenditure incurred in motivating individual supporters and trusts to donate to the work of the charity.

#### Charitable activities

Cost of charitable activities comprises the cost of Richard Dimbleby Cancer Information Centre undertaken by the Trust and grants awarded for research in palliative care and an apportionment of the support costs as shown in note 5.

#### Realised gains and losses

All gains and losses are taken to the statement of financial activities as they arise. Realised gains and losses on investments are calculated as the difference between sales proceeds and opening carrying value or their purchase value if acquired subsequent to the first day of the financial year. Unrealised gains and losses as the difference between the fair value at the year end and their carrying value. Realised and unrealised investment gains and losses are combined in the Statement of Financial Activities.

### 2. Investment Income

	2020 £	2019 £
UK unit trusts	(117)	3,581
Bank deposit interest	130	145
	13	3,726
3. Costs of Raising Funds		
	2020 £	2019 £
	L	r
Fundraising costs	29,954	76,423
Investment management costs	252	751
Support and governance costs	1,997	76,613
	32,203	153,787
4. Charitable Activities		
	2020	2019
	£	£
Online information and support	125,266	45,668
Cancer Information and Support Service cost	33,547	296,869
Support and governance costs	37,961	19,152
	196,774	361,689

#### 5. Allocation of governance and support costs

The breakdown of support costs and governance costs and how these were allocated between fund raising and charitable activities is shown in the table below: -

	Total Allocated £	Fund Raising £	Charitable Activities £	Basis of apportionment
Office running costs	7,326	366	6,960	Staff time
Administrative and operations salaries	23,987	1,199	22,788	Staff time
Audit fee (£3,333 excluding VAT)	4,000	200	3,800	Staff time
Insurance	319	16	303	Staff time
Legal fees	4,326	216	4,110	Staff time
	39,958	1,997	37,961	

Allocation on staff time is based on the activities undertaken during the year.

# NOTES TO THE ACCOUNTS Year ended 31 July 2020

# 6. Information regarding employees and trustees

	2020 £	2019 £
Salaries National Insurance Superannuation	119,563 8,020 2,087	97,908 5,902 1,130
	129,670	104,940

All trustees give of their time freely and no trustee remuneration was paid in the year.

During the year, no travel expenses (2019: £60) were reimbursed to any of the Trustees (2019: one).

There were no travel expenses outstanding at the end of the year (2019: nil).

There were four employees during the year (2019: four).

There are no higher paid employees (2019: nil).

The Charity considers its key management personnel comprise the trustees whose details appear on page 1.

# 7. Fixed Assets Investments

	2020 £	2019 £
Market value at 1 August	140,651	492,495
Less: Disposals at market value	(140,353)	(822,359)
Add: Acquisitions at cost	97,000	474,168
Net (loss)/gain on revaluation	(298)	(3,653)
Market Value at 31 July	97,000	140,651
Cash held by investment manager	2,261	1,000
Total market value at 31 July	99,261	141,651
Historical Cost at 31 July	97,000	140,670

The investments are all listed on a recognised stock exchange and the market value of each type of investment is as follows:

	2020 £	2019 £
UK unit trusts Cash	97,000 2,261	140,651 1,000
Total	99,261	141,651
8. Debtors	2020 £	2019 £
Investment income Other debtors	16 1,662 1,678	2,165 2,264 4,429
9. Creditors: Amounts falling due within one year	2020 £	2019 £
Grants payable Other creditors	16,029 44,826 	16,029 23,138 39,167

## NOTES TO THE ACCOUNTS Year ended 31 July 2020

#### 10. Reconciliation of net movements in funds to net cash flow from operating activities

	2020 £	2019 £
Net movement in funds	(26,032)	(323,477)
Deduct investment income	(13)	(3,726)
Deduct gains/add back losses on investments	298	3,653
Decrease/(increase) in sundry debtors	602	303
(Decrease)/increase in sundry creditors	21,688	(36,994)
	(3,457)	(360,241)

# 11. TAXATION

The Richard Dimbleby Cancer Fund is considered to pass the tests set out in Paragraph 1 Schedule 6 Finance Act 2010 and therefore it meets the definition of a charitable trust for UK income tax purposes. Accordingly, the charity is potentially exempt from taxation in respect of income or capital gains received within categories covered by Part 10 Income Tax Act 2007 or Section 256 of the Taxation of Chargeable Gains Act 1992, to the extent that such income or gains are applied exclusively to charitable purposes.

## 12. RELATED PARTIES

The trustees are related parties and their details are shown in the reference and administrative information on page 1.

There were no related parties transactions during the year. (2019 three transactions amounting to £2,400)