

1. Financial Statements

1:1 Opinion

So far as appears from my examination and to the best of information and according to the explanations given to me, I am of opinion that the Urban Development Authority has maintained proper accounting records for the year ended 31 December 2010 and except for the effects on the Consolidated Financial Statements of the matters referred to in paragraph 1.2 of this report, the Financial Statements have been prepared in accordance with Sri Lanka Accounting Standards and given a true and fair view of the state of affairs of the Urban Development Authority as at 31 December 2010 and the financial results of its operation and cash flows for the year then ended. Except for the effects on the Consolidated Financial Statements of the matters referred to in paragraph 1.1.1 and 1.2 of this report, the Consolidated Financial Statements have been prepared in accordance with the Sri Lanka Accounting Standards, and give a true and fair view of the state of affairs of the Urban Development Authority and its Subsidiaries as at 31 December 2010 and the financial result and cash flows of the Group of Companies for the year then ended.

1:1:1 The Consolidated Financial Statements Presented

The following observations are made.

- (a) The Consolidated Financial Statements had been prepared based on the unaudited draft financial statements of the UDA Rest Houses Ltd., the Urban Investment and Development Company (Pvt) Ltd. the Peliyagoda Warehouse Company and the Waters Edge Ltd. which are subsidiaries of the Urban Development Authority, and therefore, the correctness of the Consolidated Financial Statements is open to question.
- (b) The Urban Development Authority continues to incur losses from the year 2006 and the accumulated loss of the Authority as at the end of the year under review amounted to Rs.1,253,873,241. The net assets of the

Group of Companies show a negative value of Rs.134,308,137. The net assets of the Authority as compared with the year 2009 had deteriorated by 151 per cent and it was observed that the going concern of the Authority is uncertain without the financial assistance from the Government.

1:2 Comments on the Financial Statements

1:2:1 Issuing of Debentures

The following observations are made in this connection.

The Urban Development Authority had issued debentures amounting to Rs.10 billion redeemable in 05 years in October 2010 with a view to obtaining funds for the National Programme on the construction of 60,000 permanent dwellings for the shanty dwellers of the City of Colombo. The General Treasury had guaranteed their redemption and the payment of interest for a period of 03 years.

- (a) Annual interest from 10 per cent to 11 per cent and on +0.75 per cent floating rate should be paid on those debenture and the interest payable for the year 2010 amounted to Rs.264,835,293.
- (b) The sum of Rs.10 billion obtained on the above interest rates from the issue of debentures had been invested in the year 2010 in Treasury Bills at 7 per cent interest until the utilization of the money for the intended purpose.
- (c) The Authority had earned a sum of Rs.237,362,511 as interest up to 31 December 2010 from the investment of RS.10 billion obtained by the issues of debentures and the interest on debentures payable as at that date amounted to Rs.264,835,293. In view of the investment of the money obtained from the issue of debentures at a low interest the Authority had incurred a loss of Rs.27,472,782. It was observed that the average daily loss from 05 October 2010 to 31 December 2010 amounted to Rs.315,779.

- (d) According to the Cabinet Decision, the General Treasury had guaranteed the payment of interest payable to the debenture holders only for a period of three years, by which time the Authority would reach the level of earning income from the expected development of lands and projects. Nevertheless such money had not been utilized up to the end of the year under review to commence the work. Nevertheless, a sum of Rs.871 million had been utilized on 05 related projects by July 2011.

1:2:2 Accounting Deficiencies

The following accounting deficiencies were observed.

- (c) A sum of Rs.1,464,029 had been shown as unidentified balances in 06 Control Accounts furnished as at 31 December 2010 while a sum of Rs.55,712,576 had been shown as sundry balances in 10 Control Accounts without being clearly identified.
- (b) An audit test check revealed that the Authority had issued Development Permits amounting to Rs.95,345,851 on credit basis. Nevertheless, the particulars of the charges and interest receivable on the Development Permits issued on credit basis had not been disclosed by way of a Note to the final financial statements for the year 2010 presented to audit.
- (c) Even though a sum of Rs.11,750,827 remained payable by the Urban Development Authority to the National Building Research Organization for the consultancy services relating to different projects provided to the Urban Development Authority during the period 1999 to 2010. The provision for this amount had not been made in the accounts. The Authority informed that the amount was not brought to account due to certain activities not being certified up to the time of preparing the draft accounts and the non – receipt of money from the Ministry concerned.

1:2:3 Unreconciled Accounts

The following deficiencies were observed.

- (a) A net difference of Rs.10,984,757 was observed between the totals of balances of 08 Control Accounts and the balances of the related subsidiary records.
- (b) The outstanding balance of the former Rest House Managers according to the schedule furnished by the Rest Houses Management Division amounted to Rs.38,500,363 whereas that balance according to the information furnished by the Accounts Divisions amounted to Rs.20,387,022. Thus a difference of Rs.18,113,340 was observed.
- (c) Even though the value of lands and buildings had been shown as Rs.3,750,639,423 and the trading stock had been shown as Rs.1,054,269,198 in the financial statement an examination of the detailed schedules of those amounts revealed that certain items included in the schedules could not be considered as assets. As such it was not possible to be satisfied in audit with regard to the above values.
- (d) According to the final financial statements the amount payable to the Sri Lanka Land Reclamation and Development Corporation had been stated as Rs.136,289,125 whereas according to the confirmation receive from the Sri Lanka Land Reclamation and Development Corporation the amount receivable from the Urban Development Authority had been Rs.135,443,965. Thus a difference of Rs.845,160 was observed.
- (e) According to the financial statements, the amount recoverable from the National Housing Development Authority had been stated as Rs.33,944,640 whereas according to the confirmation received from the National Housing Development Authority, a sum of Rs.51,843,285 was receivable from Urban Development Authority. The Authority informed that action is being taken to reach concurrence with the National Housing Development Authority to eliminate the amounts which do not reconcile.

1:2:4 Unexplained Differences

According to the information made available for audit there were negative balances aggregating Rs.69,005,800 in relation to 11 accounts for over several years, and action had not been taken to identify those balances and to make necessary adjustments in the accounts.

1:2:5 Accounts Receivable and Payable

The following observations are made.

- (a) The total of the sundry advances remaining without being settled over periods ranging from 02 to 05 years and over 05 year as at 31 December 2010 amounted to Rs.4,693,476 and Rs.5,059,102 respectively.
- (b) The amounts recoverable from the customers relating to external projects old between 02 to 05 years and older than 05 years as at 31 December 2010 totalled Rs.668,138,404 and Rs.656,443,850 respectively.
- (c) Action had not been taken to identify the unusual credit balance of Rs.11,042,550 included in the total balance of Rs.1, 944,764,835 receivable from debtors relating to external projects and made adjustments in the accounts.
- (d) The unsettled balances of creditors older than 02 years to over 05 years totalled Rs.15,348,053.
- (e) The outstanding rent income remaining over periods ranging from 01 year to 05 years of the Colombo Central Supermarket Complex and other Trading Complexes as at 31 December 2010 amounted to Rs.440,683,235.
- (f) Dormant loan balances totalling Rs.1,256,554 were observed in the Staff Loans Account as at 31 December 2010.
- (g) The outstanding rent income as at 31 December 2010 amounted to Rs.34,217,283 and that exceeded 60 per cent of the total rent debtors. This

amount included rent income remaining outstanding for over 20 years and effective action had not been taken for the recovery of the amounts.

- (h) The tenants occupying the properties belonging to the Authority in the Dambulla New Town Planning Scheme should pay rent for such occupation and 05per cent monthly penalty should be paid for outstanding rents. Such outstanding amount due to the Authority as at 31 December 2010 had been Rs.69,137,692. The Authority had taken action for the recovery of the rents and the penalty thereon only from 04 out of the 62 tenants of such propaties.
- (i) Adequate steps had not been taken for the recovery of the outstanding rent balances of Rs.96,451,810 shown as the value of Terminated Tenants. That balance included an unusual negative balance of Rs.2,629,550.
- (j) Even though a sum of Rs.84,683,449 receivable by the Authority from the Ministry of Education had been shown in the financial statements, the evidence required for the confirmation of such amount was not made available to audit.
- (k) The Authority had informed the Building Materials Corporation on 08 May 2008 that a sum of Rs.1,635,276 was due for the period 25 February 1995 to 15 August 1998 in connection with the stores taken on rent by the Building Materials Corporation from the Chalmer's Stores Complex. An effective course of action for the recovery of the debt had not been taken even up to 31 December 2010.
- (l) The outstanding rent due from a private company to the Authority in connection with trade stalls given on rent from the Chalmer's Complex as at 31 August 2010 amounted to Rs.1,300,315. It was observed that the said company is out of business at present. Follow up action had not been taken for the recovery of the outstanding amount.
- (m) A co-operative shop had been maintained in a building situated on the Chittampalam A Gardiner Mawatha and the arrears of rent amounting to Rs.365,936 had not been recovered up to 31 December 2010. No follow up action had been taken after the year 2009.

- (n) According to the Rent Ledger a sum of Rs.10,680,648 had been receivable from the National Paper Company for the stores taken on rent from the Chalmer's Stores Complex for the period 01 May 1990 to 13 June 2003. There was no evidence of the recovery of the amount up to 31 December 2010.

1:2:6 Non-compliance with Laws, Rules, Regulations etc.

The following non compliances were observed.

Reference to Laws, Rules, Regulations etc.	Non - compliance
(a) Section 8:3:3 of the Public Enterprises Circular No. PED/12 of 02 June 2003 and the Management Services Circular No. 42 of 14 December 2010	If bonus is paid as a loss incurring institution it should have been limited to RS.1,000 and the bonus payable amounted to Rs.1,571,000. Nevertheless the Authority had overpaid bonus amounting to Rs.9,579,000 during the year 2010.
(b) Section 3:5 of the Procurement Guidelines	A sum of Rs.4,032,000 had been paid in the year 2010 to the Rakna Lanka Security Company for the procurement of security services without entering into a formal agreement.
(c) Planning Circular No. 8 of 30 September 1987 and Planning Circular No. 15 of 18 November 1993	Six Local Authorities relating to the District Office, Ratnapura had not opened Bank Accounts to deposit the service charges, etc of the Authority.
(d) Treasury Circular No. 295 of 28 June 1991 and the Public Enterprises Circular No. 116 of 24 January 1997	Contrary to the provisions of the circulars, 14 officers had been released to other institutions and the Urban Development Authority had paid a sum of Rs.5,733,448 as their salaries in the year under review.

- (e) Notification published in the Gazette No. 1459 / 20 of 23 August 2008
- The service charge of 1 per cent had not been recovered on the construction of two additional floors at 562/3, Lower Bagatale, Colombo 03. The penalty and other service charges recoverable for the failure to carry out development work in compliance with the City of Colombo (Revised) Development Plan 1999 and 2008 had not been recovered.
- (f) City of Colombo (Revised) Development Plan 1999 and 2008
- The 10 per cent penalty recoverable on two buildings of a private company constructed without complying with to Plan had not been recovered.
- (g) Public Enterprises Circular No. PED/12 of 02 June 2003
- (i) Sections 9:3:1 (viii) and 9:10
- Contrary to the provisions of this circular, the Authority had deployed 04 officers after their retirement on contract basis without the approval of the Cabinet of Ministers.
- (ii) Section 9:2 (c)
- Officers had been appointed to 20 posts not included in the approved cadre of the Authority.
- (iii) Section 9:2 (d)
- The cadre had not been approved by the Department of Public Enterprises.
- (iv) Section 9:3:1
- An officer who did not possess the qualifications specified in the Scheme of Recruitment had been appointed to a post.

- (v) Sections 8:3:3 (a) and 6:5 Even though bonus cannot be paid if the Annual Reports have not been tabled in Parliament, bonus had been paid when the Annual Reports after the year 2004 had not been tabled.
- (h) Administration Regions Circular No. 06/91 of 08 October 1991 Forty officers had been promoted contrary to the procedures of the Circular.
- (i) Section 4:13 and 14:3 of ICTAD/SDB/04 – Chapter III In connection with the supply of Consultancy services for the construction of a Government building, the Authority had not paid attention to the non-submission of at least the progress reports in recommending the payment of a sum of Rs.55.98 million on 06 bills. The Authority informed that it had to be so done due to the situation that prevailed in the Trincomalee area.
- (j) Financial Regulation 156 (1) and Section 29 of Chapter XLVIII of the Establishments Code Even though a sum of Rs.8,810,470 (exclusive of Value Added Tax) had been charged by the Authority for the supply of consultancy services for the construction of the District Secretariat, Trincomalee, that serviced had not been provided with responsibility.
- (k) Section 4(1) of the Urban Development Authority, Act, No. 41 of 1978 Officers representing 06 Sectors the Local Government, Industrial, Transport, Health, Education and Irrigation, Power and Highways had not been appointed to the Board of Management.
- (l) Section 16(1)(e) of the Urban Settlement Development Authority Act, No. 36 of 2008 All moneys collected by the Urban Development Authority as services charges from the property developers for the supply of funds for the low cost housing programmes should be paid to the Fund of the Urban Settlement Development Authority. Action had not been taken accordingly.

1:2:7 Lack of Evidence for Audit

The following observations are made.

- (a) The following items of account could not be satisfactorily vouched as the relevant files were not made available to audit.
- (i) Enforcement Division Files No. 5/2/42/2/2010 and No. 5/2/4/3/2010.
- (ii) Land Division File No. 10/2/1465 and No. 10/2/880.
- (iii) File No. 05/05/10/01/06/01
- (iv) File on the modernization of the Mahiyangana Circuit Bungalow with particulars on the payment of a sum of Rs.69 million.
- (b) Replies to 08 audit queries had not been furnished.

2. Financial and Operating Review2:1 Financial ReviewFinancial Results

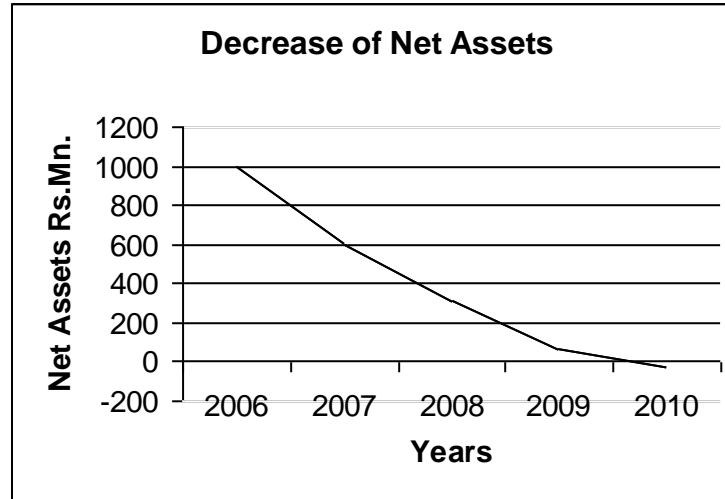
The Authority had incurred continuous losses from its operations during the year under review and the 04 preceding years. Details are shown below.

	<u>Rs. Millions</u>				
	2010	2009	2008	2007	2006
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Income	845	745	713	646	611
Other Operating Income	228	215	189	242	210
	1,073	960	902	888	821

Administration and General Expenses	(1,189)	(913)	(862)	(878)	(675)
Other Operating Expenses	(23)	(268)	(300)	(372)	(623)
	(1,212)	(1,181)	(1,162)	(1,250)	(1,298)
Operating Losses before Financial Costs	(139)	(221)	(260)	(362)	(477)
Financial Costs	(5)	(11)	(22)	(26)	(28)
Operating Loss after Financial Costs	(144)	(232)	(282)	(388)	(505)
Non-operating Income	14	14	14	14	14
Payments to Consolidated Fund	(8)	--	--	--	--
Net Project / (Loss) before Tax	(138)	(218)	(268)	(374)	(491)
Tax	(6)	(13)	(12)	(20)	(5)
Net Project / (Loss) after Tax	(144)	(231)	(280)	(394)	(496)

Even though a favorable trend of Rs.80 million had been shown by the deficit of Rs.138 million for the year under review as compared with the pre – tax loss of Rs.218 million for the preceding year, this position had reflected from the retention by the Urban Development Authority a sum of Rs.136 million collected by it, instead of paying to the Urban Settlement Development Authority in terms of the provisions of the Urban Settlement Development Authority Act. Otherwise unfavorable increased by 26 per cent of Rs.274 million in the pre – tax loss for the year would be observed.

It was observed that the Authority's net assets had dropped remarkably, as the Authority continues to incur losses from year 2006 and this situation had directly effect to the going concern of the Authority. Deterioration of Authority's net assets is clearly indicate from following chart.



2:2 Operating Review

2:2:1 Financial Control

Effective action had not been taken for the recovery of the value of cheques amounting to Rs.964,826 received and deposited by the Authority during the period 10 June 2008 to December 2010 and dishonoured.

2:2:2 Weaknesses in the Human Resources Management

The following observations are made.

- (a) The Authority had recruited 42 officers to different posts in the year 2010 and the following observations are made in that connection.
 - (i) Adequate duties had not been assigned to obtain an optimum and effective service from the officers of the Urban Development Authority.

- (ii) The approved cadre as at 31 December 2010 had been 1,669 and due to irregular recruitments the actual cadre had increased to 1,768 items resulting an excess cadre of 165. Nevertheless, it was observed that there were 231 non – permanent members of staff included in the above number.
 - (iii) Even though the excess cadre had been 165 the vacancies in permanent post of the approved cadre had been 292.
- (b) It was observed in audit that the Human Resources Management of the Authority is not in operation properly due to the following reasons.
- (i) Failure to obtain confirmation of the authenticity of the educational qualifications of the staff.
 - (ii) Failure to ensure the safe custody of personal files of the Staff.

2:2:3 Uneconomic Transactions

The following observations are made

- (a) Even though the Urban Development Authority had taken over the Horana Bus Stand and the 10 trade stalls constructed at a cost of Rs.75 million, on 12 May 2009, action had not been taken to lease out those trade stalls even up to the end of the year 2010 due to a legal obstruction.
- (b) The Trading Complex with 106 Trade Stalls constructed at the Saunder's Place in the year 2002 at a cost of Rs.16 million had not been released for use even up to the date of this report.
- (c) Even though the construction 02 motor vehicle parks in the Ratnapura Town had been completed at a cost of Rs.7,361,736 over 15 months ago those had not been released for use up to date of this report.
- (d) A land about 07 acres in extent situated at Aluthmawatha Modara had been acquired in the year 2001 for a Housing Project called Sustainable

City (Thirasara Purawara). A sum of Rs.26 million had been paid as the deposit for the acquisition and the compensation and interest payable thereon as at date totalled Rs.199 million. The Authority had failed to implement any project whatsoever on this land despite the elapse of over 10 years.

2:2:4 Release of Resources of the Authority to Other Institutions

The Authority had released a motor vehicle with a driver to the Urban Settlement Development Authority, a driver to the Ministry of Transport and a tractor to the Katharagama Pradeshiya Sabha. The Authority had spent a sum of Rs.40,297 in the year 2010 on fuel and other expenses in connection with the motor vehicle released to the Urban Settlement Development. Authority and the Sri Lanka Land Reclamation and Development Corporation.

2:2:5 Fruitless Investments

The following observations are made.

(a) Ocean View Development (Private) Company: Rs.92,000,000

No return whatsoever had been received since the year 2005 up to the year under review. Action had not been taken in terms of the Cabinet decision to convert the company to a Public Company and recover the money invested.

(b) REEL Company : Rs.28,950,000

No return had been received since the year 2005. No return had been received for the investment amounting to 18 per cent of the value of lands leased out to the Company by the Authority. The lands had not been recovered by cancelling the lease agreement for the failure to develop the lands.

(c) Peliyagoda Warehouse: Rs.299,999,930

No returns had been received and 100 per cent provision had been made for the decrease in the market price due to the losses incurred by the Company over long periods.

2:2:6 Management Inefficiencies

The following observations are made.

- (a) A test check revealed that out of a sum of Rs.100 million recoverable on the issue of development permits, a sum of Rs.85 million is outstanding as the installments are not paid as specified. Out of the 104 installments payable only 13 installments had been paid. The Authority had failed to recognize the fact that those should have been paid within the specified periods and also to take necessary action to recover the amounts. Details appear below.
- (b) According to the Gazette Notification, the service charges recovered on the installment and a policy of charging interest at 18 per cent on the installments allowed had been adopted. Nevertheless, action had not been taken for the recovery of interest amounting to Rs.9,806,287 payable by 08 institutions.
- (c) In view of the issue of the development permits on credit basis by the Urban Development Authority, the risk of losing an income of Rs.94,251,659 exists.
- (d) In view of the failure to take management decisions on the sale of lands and buildings, the sale of lands and buildings in the year 2010 as compared with the year 2009 had decreased by 92 per cent. Nevertheless, the Authority informed that this position had arisen due to the temporary suspension of the disposal of Government property such as leasing and sale due to the elections held in the year 2010.

2:2:7 Transactions of Contentious Nature

The following observations are made.

- (a) The covering approval for a construction with 11 floors had been granted by depriving an income of Rs.3,694,548 to the Authority and the following observations are also made in that connection.
- i. The Certificate of Conformity issued for the above building by the Colombo Municipal Council had been cancelled on 10 March 2010 adducing the reasons such as the construction done contrary to the Colombo City Development Plan, the use of the building at present for residential purposes, and construction done contrary to the relevant development permit.
 - ii. Even though a charge of 30 per cent of the cost of construction amounting to Rs.5,541,822 should be recovered on this construction which cannot be regularized by a covering approval. It had been decided to recover 10 per cent equivalent Rs.1,847,274. Accordingly the Authority had lost an income of Rs.3,694,548.
 - iii. The Authority had issued a development permit again on 15 March 2010 on condition that the above sum will be paid on the issue of the deeds and the Certificate of Conformity was issued on 25 March 2010, that is, within 10 days after the issue of the development permit.
 - iv. The Authority had issued its Certificate of Conformity without the settlement of any of the matters for which the Colombo Municipal Council had cancelled its Certificate of Conformity.
 - v. The above building had not been constructed in conformity with the Colombo City Development Plan in relation to the floor area ratio and the Building limits. The evidence in support of the recovery of penalty due to those reasons was not made available.

- (b) Instances of issue work done certificates erroneously without acting in professional and trustworthy manner in providing consultancy services by the Authority to other State institution were observed. The recommendation of work valued at Rs. 19 million not completed, as work completed and the recommendation for the payment of Rs.61 million without furnishing progress reports in connection with the construction of the District Secretariat Building, Trincomalee can be cited as an example.
- (c) Contrary to the Cabinet Paper No. 03/0867/123/013/EPC/366 prohibiting the land filling of all wetland paddy fields and low lying lands, such approval had been granted for a land near the Talangama Wewa in Battaramulla under the Plan No. 2265. In this connection it was observed that a Planning Committee meeting had not been held and a Planning Officer of the Authority had not participated in the matter. The Authority had failed to take appropriate steps in this connection.
- (d) The Colombo Municipal Council had issued a development permit on 04 July 2007 for the construction of a 02 storeyed office building on premises No. 65, W.A. Silva Mawatha, Colombo 06. Subsequently a building with 05 storeys had been constructed without approval and used for running a textile business. The Urban Development Authority had issued a development permit on 17 July 2006 and the landlord had produced copies of Certificate of Conformity on 22 January 2007. Subsequent enquires had revealed that the developer had produced a fake development permit and a Certificate of Conformity. The Chairman informed that those documents were handed over to the Criminal Investigation Department.
- (e) The deficiencies observed in connection with the issue of a development permit to a private Tourist Holiday Resort in the Ampara Town had been as follows.
 - (i) The development permit had been issued without recovering the fee of Rs.10,366,673 recoverable by the Urban Development Authority.

- (ii) Prior to the issue of the development permit, a 03 storeyed Tourist Resort with floor area of 4,193 square meters had been constructed and run the business without approval.
 - (iii) The permit had been issued without ensuring that freehold ownerships of the land on which the building is situated and the environment permit had been obtained.
- (f) The motor vehicle park on D.R. Wijewardhana Mawatha had been handed over to outside parties at a monthly rental of Rs.47,500 without following the appropriate procedure and the monthly rent had been reduced subsequently to Rs.30,000. Action had not been taken to run the motor vehicle park with adequate space for parking a large number of motor vehicles by the Authority itself under proper supervision to earn a better income.

2:2:8 Performance

The following observations are made in this connection.

- (a) Out of the projects with estimated costs of Rs.4,751 million implemented by the Authority, no work whatsoever had been done on 07 Projects in the year 2010.
- (b) Two projects for implementation in the year 2010 had been suspended and the expenditure incurred thereon amounted to Rs.60,295,992.
- (c) The period planned for the completion of 03 projects had elapsed, and the estimated cost of the projects amounted to Rs.90 million.
- (d) Certain projects had been started without completing the process of acquisition of lands and the work on 07 projects had stalled due to that reason. A sum of Rs.239,177,230 had been spent on those projects.

- (e) The position of most of the projects appearing in the Progress Reports prepared as at 31 December 2009 remained the same even during the year 2010. Thus it was observed that the performance of the projects of the Authority in the year 2010 had been at an extraneously low level.

3. Expenditure Contrary to Objectives

Contrary to the objectives of the Urban Development Authority Act, No. 41 of 1978, a sum of Rs.69 million had been spent for the modernization of the VIP Circuit Bungalow of the Authority at Mahiyangana. This work had been done without being included in the budget for the year 2009 and without preparing cost estimates and contrary to the provisions of the Procurement Guidelines. As compared with the contract value, the value of extra work had been very high. Subsequent to the modernization, the Circuit Bungalow together with the equipment had been handed over to the Sri Lanka Army.

4. Budgetary Control

Significant variances were observed between the estimated and the actual income and expenditure, thus indicating that the budget had not been made use of as an effective instrument of management control.

5. Systems and Control

Deficiencies observed during the course of audit were brought to the notice of the Chairman of the Authority from time to time. Special attention is needed in respect of the following area of control.

- (a) Personnel Management
- (b) Issue of Development Permits
- (c) Accounting for Income
- (d) Recovery of Money from Debtors
- (e) Obtaining Advances from clients.

