

2008 No. 29

NATIONAL HEALTH SERVICE, WALES

**The Alternative Provider Medical Services (Wales) Directions
2008**

Made - - - - *15th September 2008*

Coming into force - - *16th September 2008*

The Welsh Ministers, in exercise of the powers conferred by section 12(3) of the National Health Service (Wales) Act 2006(1) hereby give the following Directions:

PART 1

GENERAL

Title, commencement, application and interpretation

1.—(1) The title of these Directions is the Alternative Provider Medical Services (Wales) Directions 2008.

(2) These Directions come into force on 16th September 2008.

(3) These Directions are given to all Local Health Boards in Wales.

(4) In these Directions—

“the 2006 Act” means the National Health Service (Wales) Act 2006;

“additional services” has the same meaning as in the GMS Regulations;

“APMS” means arrangements made under section 41 (2)(b) of the 2006 Act (primary medical services) for the provision of primary medical services and “APMS contract” and “APMS contractor” shall be construed accordingly;

“bank holiday” has the same meaning as in GMS Regulations;

“core hours” has the same meaning as in the GMS Regulations;

“essential services” means the services described in regulation 15(3), (5), (6) and (8) of the GMS Regulations (essential services) or services that are equivalent to those services and which are provided during core hours;

“the GMS Regulations” means the National Health Service (General Medical Services Contracts) (Wales) Regulations 2004(2);

“licensing body” means any body that licences or regulates any profession;

(1) 2006 c.42.

(2) S.I.2004/478 (W.48), as amended by S.I. 2004/1017 (W.114), S.I. 2006/358 (W.46), S.I. 2007/205 (W.19), S.I. 2008/1329 (W. 138) and 2008/1425 (W.147).

“list of patients” means in relation to an APMS contractor, the list maintained in respect of that contractor by the Local Health Board under direction 13;

“national disqualification” has the same meaning as in the GMS Regulations;

“NHS contract” has the meaning given to it in section 7 of the 2006 Act;

“out of hours period” has the same meaning as in the GMS Regulations;

“out of hours services” means services required to be provided in all or part of the out of hours period which would be essential services if provided in core hours;

“patient” means a person to whom the APMS contractor is required to provide primary medical services under its APMS contract;

“prescriber”⁽¹⁾ has the same meaning as in the GMS Regulations;

“primary care list” has the same meaning as in the GMS Regulations;

“registered patient” means –

(a) a person who is recorded by the Local Health Board as being on the APMS contractor’s list of patients, or

(b) a person whom the APMS contractor has accepted for inclusion on its list of patients, whether or not notification of that acceptance has been received by the Local Health Board and who has not been notified by the Local Health Board as having ceased to be on that list.

“repeatable prescriber” means a prescriber who is—

(a) engaged or employed by an APMS contractor which provides repeatable prescribing services under the terms of its APMS contract, or

(b) a party to an APMS contract under which such services are provided;

“repeatable prescribing services” means services which involve the prescribing of drugs, medicines or appliances on a repeatable prescription; and

“repeatable prescription” has the same meaning as in the GMS Regulations;

(5) In relation to a requirement to include terms having the effect specified in the provisions of the GMS Regulations, those terms shall be read as if references in the GMS Regulations to—

(a) “a contract” or “the contract” were to “an APMS contract” or “the APMS contract”;

(b) “the contractor” or “a contractor” were to “the APMS contractor” or “an APMS contractor”; and

(c) provisions of those Regulations were references to corresponding provisions of these Directions where these Directions require an equivalent term to be included in an APMS contract.

Minimum standards

2. Nothing in these Directions shall prevent a Local Health Board agreeing contractual terms of an APMS contract which require a higher level of performance by the APMS contractor than would otherwise be required pursuant to these Directions.

PART 2

PROVIDER CONDITIONS

Provider Conditions

3.—(1) The Local Health Board may not enter into an APMS contract with an individual if that individual falls within paragraph (5).

(1) The definition of “prescriber” was amended by S.I. 2007/205 (W.19), regulation 4(5).

- (2) A Local Health Board may not enter into an APMS contract with a company if—
- (a) that company; or
 - (b) any director or secretary of that company,

falls within paragraph (5).

- (3) A Local Health Board may not enter into an APMS contract with a partnership if—
- (a) any individual member of that partnership; or
 - (b) that partnership,

falls within paragraph (5).

(4) A Local Health Board may not enter into an APMS contract with an industrial and provident society, a friendly society, a voluntary organisation⁽¹⁾ or any other body if—

- (a) the society, organisation or body; or
- (b) any officer, trustee or any other person concerned with the management of the society, organisation or body,

falls within paragraph (5).

(5) A person, partnership or body falls within this paragraph if—

- (a) he, she or it is the subject of a national disqualification;
- (b) subject to paragraph (6), he, she or it is disqualified or suspended (other than by an interim suspension order or direction pending an investigation) from practising by any licensing body anywhere in the world;
- (c) within the period of five years prior to the signing of the APMS contract or commencement of the APMS contract, whichever is the earlier, he or she has been dismissed (otherwise than by reason of redundancy) from any employment by a health service body unless he or she has subsequently been employed by that health service body or another health service body and paragraph (7) applies to him or her or that dismissal was the subject of a finding of unfair dismissal by any competent tribunal or court;
- (d) within the period of five years prior to the signing of the APMS contract or commencement of the APMS contract, whichever is the earlier, he, she or it has been removed from, or refused admission to, a primary care list by reason of inefficiency, fraud or unsuitability (within the meaning of section 107(2), (3) or (4) of the 2006 Act respectively unless his, her or its name has subsequently been included in such a list;
- (e) he or she has been convicted in the United Kingdom of murder;
- (f) he or she has been convicted in the United Kingdom of a criminal offence, committed on or after 26 August 2002 and has been sentenced to a term of imprisonment of over six months;
- (g) subject to paragraph (8) he or she has been convicted elsewhere of an offence
 - (i) which would, if committed in England and Wales, constitute murder, or
 - (ii) committed on or after 3 November 2003, which would, if committed in England and Wales, constitute a criminal offence other than murder, and been sentenced to a term of imprisonment of over six months;
- (h) he or she has been convicted of an offence referred to in Schedule 1 of the Children and Young Persons Act 1933⁽²⁾ (offences against children and young persons with respect to which special provisions of the Act apply) or Schedule 1 to the Criminal Procedure

(1) “voluntary organisation” is defined in section 206(1) of the National Health Service (Wales) Act 2006.

(2) 1933 c.12 as amended by the Criminal Justice Act 1988 (c.33), section 170, Schedule 15, paragraph 8 and Schedule 16, paragraph 16; the Sexual Offences Act 1956 (c.69), sections 48 and 51 and Schedules 3 and 4 and as modified by the Criminal Justice Act 1988, section 170(1), Schedule 15, paragraph 9.

(Scotland) Act 1995⁽¹⁾ (offences against children under the age of 17 years to which special provisions of the Act apply) committed on or after 1 April 2004;

- (i) he, she or it has—
 - (i) been adjudged bankrupt or had sequestration of his or her estate awarded unless (in either case) he or she has been discharged or the bankruptcy order has been annulled,
 - (ii) made the subject of a bankruptcy restrictions order or an interim bankruptcy restrictions order under Schedule 4A of the Insolvency Act 1986⁽²⁾ or Schedule 2A to the Insolvency (Northern Ireland) Order 1989⁽³⁾,
 - (iii) made a composition or arrangement with, or granted a trust deed for his, her or its creditors unless he, she or it has been discharged in respect of it;
- (j) an administrator, administrative receiver or receiver is appointed in respect of it;
- (k) within the period of five years prior to signing the APMS contract or commencement of the APMS contract, whichever is the earlier, he or she has been—
 - (i) removed from the office of charity trustee or trustee for a charity by an order made by the Charity Commissioners or the High Court on the grounds of any misconduct or mismanagement in the administration of the charity for which he or she was responsible or to which he or she was privy, or which he or she by their conduct contributed or facilitated, or
 - (ii) removed under section 7 of the Law Reform (Miscellaneous Provisions) (Scotland) Act 1990⁽⁴⁾ (powers for the Court of Session to deal with management of charities), from being concerned in the management or control of any body; or
- (l) he or she is subject to a disqualification order under the Company Directors Disqualification Act 1986⁽⁵⁾, the Companies (Northern Ireland) Order 1986⁽⁶⁾ or to an order made under section 429(2)(b) of the Insolvency Act 1986⁽⁷⁾ (failure to pay under county court administration order).

(6) A person shall not fall within paragraph (5)(b) where the Local Health Board is satisfied that the disqualification or suspension from practising is imposed by a licensing body outside the United Kingdom and it does not make the person unsuitable to be—

- (a) a party to an APMS contract;
- (b) in the case of an APMS contract with a company, a director or company secretary of a company entering into an APMS contract; or
- (c) in the case of an APMS contract with an industrial and provident society, friendly society, voluntary organisation or other body, an officer, trustee or other person concerned with the management of such a society, organisation or other body entering into an APMS contract.

(7) Where a person has been employed as a member of a health care profession any subsequent employment must also be as a member of that profession.

(8) A person shall not fall within paragraph (5)(g) where the Local Health Board is satisfied that the conviction does not make the person unsuitable to be—

- (a) a party to an APMS contract;
- (b) in the case of an APMS contract with a company, a director or company secretary of a company entering into an APMS contract; or
- (c) in the case of an APMS contract with an industrial and provident society, friendly society, voluntary organisation or other body, an officer, trustee or other person concerned with

(1) 1995 c.46.

(2) 1986 c.45. Schedule 4A was inserted by section 257 of, and Schedule 20 to, the Enterprise Act 2002 (c.40).

(3) S.I. 1989/2405 (N.I. 19).

(4) 1990 c.40.

(5) 1986 c.46 as amended by the Insolvency Act 2000 (c.39).

(6) S.I.1986/1032 (N.I.6)

(7) 1986 c.45

the management of such a society, organisation or other body entering into an APMS contract.

PART 3

MANDATORY TERMS FOR ALL APMS CONTRACTS

General terms

4. A Local Health Board which wishes to enter into an APMS contract shall ensure that the APMS contract—

- (a) states that it is an NHS contract where the contract is to be an NHS contract because the APMS contractor is an NHS body or is to be regarded as such a body by virtue of regulation 10 of the GMS Regulations;
- (b) specifies who the APMS contractor is to provide services to under the APMS contract, including where appropriate by reference to an area within which a person resident would be entitled to receive services under the APMS contract;
- (c) specifies that the APMS contractor shall not sell, assign or otherwise dispose of the benefit of any of its rights under the APMS contract without the prior consent of the Local Health Board;
- (d) subject to direction 5(1)(j), specifies the circumstances (if any) in which any obligations under the APMS contract may be sub-contracted;
- (e) specifies the grounds (in addition to those required by direction 5(1)(t), (u) and (v) in which the APMS contract may or must be terminated and any contract sanctions; and
- (f) specifies in the case of a contract which is not an NHS contract, the procedures that are to apply in the event of a contractual dispute

Other contractual terms

5.—(1) A Local Health Board which wishes to enter into an APMS contract shall ensure that the APMS contract contains terms which have the effect specified in the following provisions of Schedule 6 (other contractual terms) to the GMS Regulations—

- (a) paragraph 1 (premises);
- (b) paragraph 1A (telephone services)(1);
- (c) paragraph 7 (clinical reports), but as if for sub-paragraph (2) the following were substituted—
 - “(2) The Local Health Board shall send any report received under sub-paragraph (1)—
 - (a) to the person with whom the patient is registered for the provision of essential services or their equivalent; or
 - (b) if the person referred to in paragraph (a) is not known to it, the Local Health Board, Health Board, Primary Care Trust or Health and Social Services Board in whose area the patient is resident unless it is that Local Health Board.
 - (3) This paragraph does not apply in relation to out of hours services provided by a contractor.”;
- (d) paragraph 8 (storage of vaccines) and 9 (infection control);
- (e) paragraphs 38 and 39 (prescribing)(1), 40 (repeatable prescribing services), 41 (repeatable prescriptions), 42 (restrictions on prescribing by medical practitioners) to

(1) Paragraph 1A was inserted into Schedule 6 to the National Health Service (General Medical Services Contracts) (Wales) Regulations 2004 (S.I. 2004/478 (W.147) (“the GMS Regulations”) by S.I. 2006/358 (W.46), regulation 11(2).

46(1) (excessive prescribing) and 51 (provision of drugs, medicines and appliances for immediate treatment or personal administration), but as if—

- (i) in paragraph 42, references to “regulation 24(2)(b)” were references to “direction 8(a)(ii)”, and
 - (ii) any requirement for a repeatable prescription to include the name of the contractor were omitted;
- (f) paragraphs 52(2) to 55 (qualifications of performers), but as if paragraph 52 sub-paragraph (2)(a) were omitted;
 - (g) paragraphs 59(1) and (3) (conditions for employment and engagement), 60 (training), 61 and 62 (arrangements for GP Registrars);
 - (h) paragraph 65 (signing of documents)(3);
 - (i) paragraph 66 (level of skill);
 - (j) paragraph 68(10) (sub-contracting clinical matters(4));
 - (k) paragraphs 72(2) (patient records) but as if the words “and shall do so” to the end were omitted and 74 (confidentiality of personal data);
 - (l) paragraph 76 (provision of information);
 - (m) paragraph 77 (inquiries about prescriptions and referrals) and 78 (reports to a medical officer);
 - (n) paragraph 79 (annual return and review) but as if in sub-paragraph (1) the words “which shall require” to the end and sub-paragraph (3) were omitted;
 - (o) paragraphs 80 and 81 (notifications to the Local Health Board);
 - (p) paragraph 85 (notification of deaths);
 - (q) paragraphs 87(1) – (2)(c), 88 to 89 (rights of entry and inspection);
 - (r) paragraph 95 (co-operation with investigations);
 - (s) paragraph 102 (variation of a contract: general), but as if—
 - (i) in sub-paragraph (1), the words “Subject to Schedule 3, paragraphs 68(8), 69(8), 103, 104 and 115 of this Schedule and paragraph 3 of Schedule 7,” were omitted(5), and
 - (ii) in sub-paragraph (2), the words “In addition to the specific provision made in paragraphs 103(6), 104(6) and 115”, were omitted;
 - (t) paragraph 105A (termination on the death of an individual medical practitioner(6) but as if the reference in sub-paragraph 3 to “paragraph 112 to 115” were to the terms included in the APMS contract pursuant to sub-paragraphs (u) to (w) of this paragraph; paragraph 110 (termination by the Local Health Board for the provision of untrue etc information), but as if the reference to “regulation 4 and 5” were to direction 4;
 - (u) paragraph 111 (other grounds for termination by the Local Health Board) but as if sub-paragraph (1) was substituted as follows—

“111.–(1) The Local Health Board may serve notice in writing terminating the APMS contract forthwith, or from such date as may be specified in the notice if—

 - (a) in the case of an APMS contract with an individual, the individual;
 - (b) in the case of an APMS contract with a company—
 - (i) the company, or

(1) Paragraph 38 was substituted and 39 was amended by S.I. 2008/1329 (W.138), regulation 3.

(2) Paragraph 52 was amended by S.I.2008/1425 (W.147), regulation 4, to make provision in relation to those undertaking a programme of post-registration supervised clinical practice and to extend the time that GP registrars are not required to be on a Performers List at the commencement of their training period from two to three months.

(3) Paragraph 65 was amended by S.I.2008/1329 (W.138), regulation 3(4), to provide that certain forms do not need to include the name of the contractor on whose behalf the form was signed and to make provision regarding the details required to be included on home oxygen order forms.

(4) Paragraph 68(10) was inserted into Schedule 6 to the GMS Regulations 2004 by S.I. 2004/1017 (W.114), regulation 4.

(5) Sub-paragraph (1) was amended by S.I.2006/358 (W.46), regulation 11(25).

(6) Paragraph 105A was inserted into the GMS Regulations by S.I.2006/358 (W.46), regulation 11(28).

- (ii) any director or company secretary of the company;
- (c) in the case of an APMS contract with a partnership—
 - (i) any individual member of the partnership, or
 - (ii) the partnership; or
- (d) in the case of an APMS contract with an industrial and provident society, a friendly society, a voluntary organisation or any other body—
 - (i) the society, organisation or other body, or
 - (ii) an officer, trustee or any other person concerned with the management of the society, organisation or body,

falls within sub-paragraph (2) during the existence of the APMS contract.”; [paragraphs 112 and 112A (termination by the Local Health Board for unlawful sub-contracting)(1);

- (v) paragraph 119 (clinical governance)(2);
- (w) paragraphs 120 and 121 (insurance), but as if in the definition of “insurance” in paragraph 120(3)(a) applied to paragraph 121.
- (x) paragraph 122 (gifts)(3), but as if—
 - (i) in sub-paragraph (2)—
 - (aa) paragraphs (a), (b) and (c) were omitted; and
 - (bb) references to “paragraphs (b) to (e)” were to “paragraphs (d) and (e)”, and
 - (ii) in sub-paragraph (4), the reference to “sub-paragraph (2)(b) to (g)” were to “sub-paragraph (2)(d) to (g)”.

(2) A Local Health Board which wishes to enter into an APMS contract shall consider whether the APMS contract should require the contractor to keep a register of gifts given to the following persons (in addition to the persons who the APMS contractor is required to record gifts given to pursuant to paragraph (1)(y))—

- (a) the APMS contractor;
- (b) where the APMS contractor is a company, to any director or company secretary of the company;
- (c) where the APMS contractor is a partnership, to a member of the partnership; or
- (d) where the APMS contractor is an industrial and provident society, a friendly society, a voluntary organisation or any other body, to an officer, trustee or any other person concerned with the management of the society, organisation or body.

Certificates

6. A Local Health Board which wishes to enter into an APMS contract shall ensure that the APMS contract contains terms having the effect specified in regulation 21 (certificates) of, and Schedule 4 (list of prescribed medical certificates) to the GMS Regulations.

Appraisal and assessment of performers of APMS

7. A Local Health Board which wishes to enter into an APMS contract shall ensure that the APMS contract requires the APMS contractor to ensure that any medical practitioner performing medical services under the APMS contract—

- (a) participates in an appropriate appraisal system; and

(1) Paragraph 112A was inserted into Schedule 6 to the GMS Regulations by S.I.2004/1017 (W.114), regulation 4(2).
 (2) Paragraph 119 was amended by S.I.2008/1425 (W.147), regulation 4.
 (3) Paragraph 122 was amended to include a reference to a “civil partner” by S.I.2006/358 (W.46), regulation 11(34).

- (b) co-operates with the National Patient Safety Agency⁽¹⁾ when requested to do so by the Local Health Board.

Charges

8. A Local Health Board which wishes to enter into an APMS contract shall ensure that the APMS contract—

- (a) prohibits the APMS contractor, either itself or through any other person, from demanding or accepting from any of its registered patients a fee or other remuneration, for its own or another's benefit for—
 - (i) the provision of any treatment whether under the APMS contract or otherwise; or
 - (ii) any prescription or repeatable prescription for any drug, medicine or appliance, except in the circumstances set out in Schedule 5 to the GMS Regulations;
- (b) prohibits the APMS contractor, either itself or through any other person, from demanding or accepting from any of its patients other than a registered patient a fee or other remuneration, for its own or another's benefit for—
 - (i) the provision of any treatment under the APMS contract; or
 - (ii) any prescription or repeatable prescription for any drug, medicine or appliance in connection with that treatment;
- (c) contains terms having the same effect as those specified in regulation 24(3) and (4) of the GMS Regulations; and
- (d) requires the APMS contractor in the provision of services to patients under the APMS contract—
 - (i) to provide information regarding other services it provides otherwise than under the APMS contract only where appropriate,
 - (ii) where it does provide such information, to ensure that the information provided is fair and accurate, and
 - (iii) where the other services are available to the patient as part of the health service established pursuant to section 1 of the 2006 Act, to inform the patient—
 - (aa) that the services are so available;
 - (bb) of any charge that applies to that health service and, if no such charge applies, that the service is free; and
 - (cc) how to access those health services.

Financial interests

9.—(1) A Local Health Board which wishes to enter into an APMS contract shall ensure that the APMS contract requires the APMS contractor in making a decision—

- (a) to refer a patient for any other services under the 2006 Act; or
- (b) to prescribe any drug, medicine or appliance to a patient,

to do so without regards to its own financial interests.

(2) The Local Health Board shall further ensure that an APMS contract contains a term having the effect of prohibiting the APMS contractor from informing patients that any prescription or repeatable prescription for any drug, medicine or appliance must be dispensed only by the APMS contractor or a person with whom the APMS contractor is associated.

⁽¹⁾ The National Patient Safety Agency is established as a Special Health Authority by the National Patient Safety (Establishment and Constitution) Order 2001 (S.I.2001/1743).

Consequences of termination of an APMS contract

10. A Local Health Board which wishes to enter into an APMS contract shall ensure that the APMS contract makes suitable provision for the arrangements on termination of an APMS contract, including the consequences (whether financial or otherwise) of the APMS contract ending.

PART 4

MANDATORY TERMS OF AN APMS CONTRACT UNDER WHICH ESSENTIAL SERVICES ARE TO BE PROVIDED

Mandatory terms of an APMS contract under which essential services are to be provided

11.—(1) A Local Health Board which wishes to enter into an APMS contract under which essential services are to be provided shall ensure (in addition to the requirements specified in directions 4 to 10) that the APMS contract contains terms which have the effect specified in the following provisions of Schedule 6 (other contractual terms) to the GMS Regulations—

- (a) paragraph 2 (attendance at practice premises);
- (b) paragraphs 12 and 13 (duty of co-operation);
- (c) paragraph 18 (patient preference of practitioner)(1);
- (d) paragraph 63 (arrangements for GP Registrars);
- (e) paragraph 72 (patient records)(2);
- (f) paragraph 75 (contractor's leaflet), but as if the words "and to the Local Health Board" were added at the end of sub-paragraph (c); and
- (g) paragraph 86 (notifications to patients following variation of the agreement), but as if the words "in accordance with Part 8 of this Schedule" were omitted.

(2) The Local Health Board shall further ensure that any such APMS contract makes provision as to the circumstances (if any) in which the Local Health Board may assign patients to the contractor and where appropriate, as to whether the APMS contractor's list of patients is to be regarded as open or closed and in what circumstances the status of the list may change.

(3) The Local Health Board shall further ensure that such an APMS contract makes provision as to the circumstances (if any) in which the APMS contractor is required to attend a patient otherwise than at the contractor's premises.

PART 5

MANDATORY TERM FOR AN APMS CONTRACT UNDER WHICH OUT OF HOURS SERVICES ARE TO BE PROVIDED

Mandatory term for an APMS contract under which out of hours services are to be provided

12. Where a Local Health Board wishes to enter into an APMS contract under which out of hours services are to be provided it shall ensure (in addition to the requirements specified in directions 4 to 10) that the APMS contract shall require the APMS contractor, in the provision of such services, to meet the quality requirements set out in the document "Out of Hours Quality Monitoring Standards" which was issued to the Chief Executives of Local Health Boards on 6 July 2004(3).

(1) Paragraph 18 was amended by S.I.2008/1425 (W.147) in respect of adults who lack capacity, regulation 4(1)(c).

(2) Paragraph 72 was amended by S.I.2006/358 (W.46), regulation 11(17).

(3) This document is available on the GMS Contract website at <http://www.wales.nhs.uk/sites3/page.cfm?orgid=480&pid=6066>

PART 6

PATIENT LISTS

Patient lists

13.Where an APMS contract requires an APMS contractor to provide essential services and to have a list of patients, the Local Health Board shall prepare and keep up to date a list of the patients—

- (a) who have been accepted by the APMS contractor for inclusion in the APMS contractor's list of patients in accordance with the terms of the APMS contract and who have not subsequently been removed from that list in accordance with the terms of the APMS contract; and
- (b) where applicable, who have been assigned to the APMS contractor in accordance with the terms of the APMS contract and whose assignment has not been rescinded.

PART 7

MISCELLANEOUS

APMS contracts entered into before the coming into force of these Directions

14.—(1) Where a Local Health Board has entered into an APMS contract before the coming into force of these Directions which does not comply with these Directions, it shall enter into negotiations with the APMS contractor with a view to agreeing variations to the APMS contract to make it compatible with these Directions.

(2) Where a Local Health Board has power under an APMS contract to impose a variation of the APMS contract, it shall where necessary (and in particular where the negotiations envisaged under paragraph (1) have failed) exercise that power so as to ensure that the APMS contract is compatible with these Directions.

PART 8

REVOCATIONS

Revocations

15.The Alternative Provider Medical Services (Wales) Directions 2006 which came into force on 1 March 2006 are revoked.

Signed by Peter Lawler, Acting Director of Community Primary Care and Health Services Policy Directorate, under the authority of the Minister for Health and Social Services, one of the Welsh Ministers

A handwritten signature in black ink, appearing to read "Shantik". The signature is written in a cursive style with a large, looping initial letter.

Date: 15 September 2008