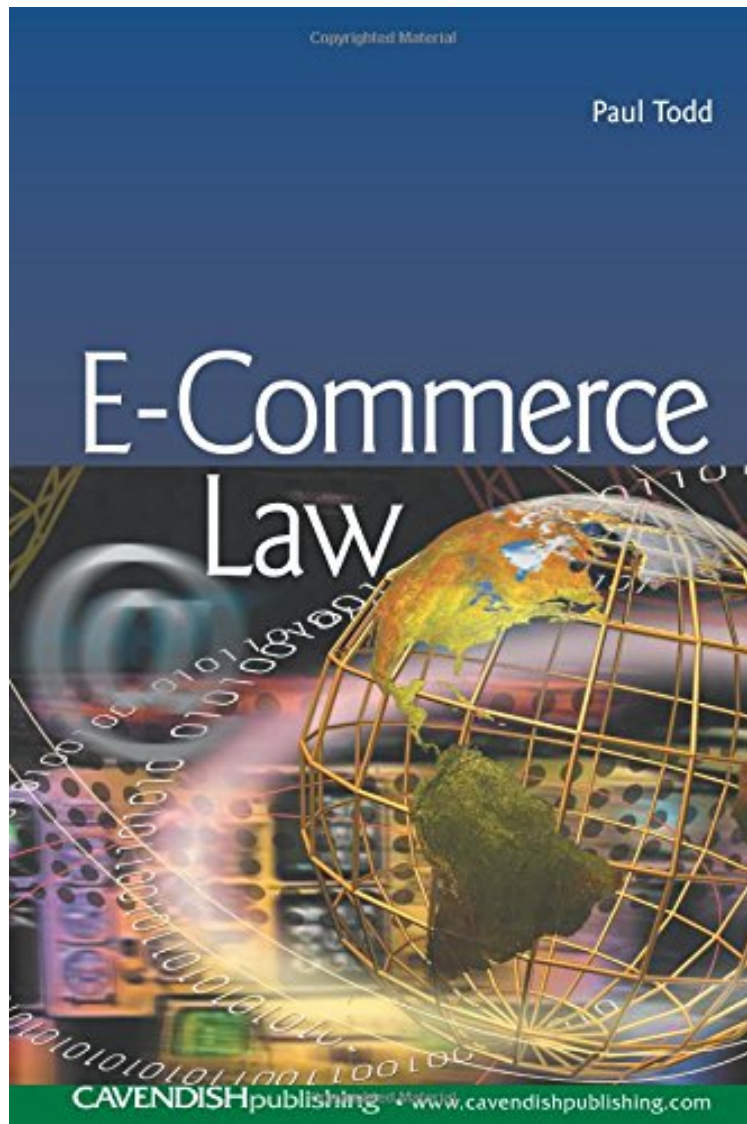


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the book is written from a UK perspective, comparative material is included from other jurisdictions, including America and Singapore in particular.