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# Agenda for a meeting of the Governance and Audit Committee to be held on Thursday, 15 June 2023 at 10.30 am in Committee Room 3 - City Hall, Bradford

#### Members of the Committee - Councillors

LABOUR	CONSERVATIVE	GREEN
Tait Thornton Godwin	Felstead	Hickson

#### **Alternates:**

LABOUR	CONSERVATIVE	GREEN
Alipoor K Hussain H Khan	Pollard	Love

#### Notes:

- This agenda can be made available in Braille, large print or tape format on request by contacting the Agenda contact shown below.
- The taking of photographs, filming and sound recording of the meeting is allowed except if Councillors vote to exclude the public to discuss confidential matters covered by Schedule 12A of the Local Government Act 1972. Recording activity should be respectful to the conduct of the meeting and behaviour that disrupts the meeting (such as oral commentary) will not be permitted. Anyone attending the meeting who wishes to record or film the meeting's proceedings is advised to liaise with the Agenda Contact who will provide guidance and ensure that any necessary arrangements are in place. Those present who are invited to make spoken contributions to the meeting should be aware that they may be filmed or sound recorded.
- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

#### From:

Asif Ibrahim
Director of Legal and Governance

Agenda Contact: Kav Amrez

Phone: 07929 070288

E-Mail: kanwal.amrez2@bradford.gov.uk

#### A. PROCEDURAL ITEMS

#### 1. ALTERNATE MEMBERS (Standing Order 34)

The Director of Legal and Governance will report the names of alternate Members who are attending the meeting in place of appointed Members.

#### 2. DISCLOSURES OF INTEREST

Members Code of Conduct – Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

#### Notes:

(1) Members must consider their interests, and act according to the following:

Type of Interest	You must:
Disclosable Pecuniary Interests	Disclose the interest; not participate in the discussion or vote; and leave the meeting unless you have a dispensation
Other Registrable Interests (Directly Related) OR Non-Registrable Interests (Directly Related)	Disclose the interest; speak on the item only if the public are also allowed to speak but otherwise not participate in th discussion or vote; and leave the meeting unless you have a dispensation
Other Registrable Interests (Affects) <b>OR</b> Non-Registrable Interests (Affects)	Disclose the interest; remain in the meeting, participate and vote <u>unless</u> the matter affects the financial interest or well-being
	(a) to a greater extent than it affects the financial interests of a majority of inhabitants of the affected ward, and
	(b) a reasonable member of the public knowing all the facts would believe the

it would affect your view of the wider public interest; in which case speak o the item <u>only if</u> the public are also allowed to speak but otherwise not do not participate in the discussion or vote; and leave the meeting <u>unless</u> you have a dispensation.

- (2) Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.
- (3) Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.
- (4) Officers must disclose interests in accordance with Council Standing Order 44.

#### 3. MINUTES

#### Recommended -

That the minutes of the meeting held on 23 March 2023 be signed as a correct record.

(Kanwal Amrez – 07929 070288)

#### 4. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report.

If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Kanwal Amrez – 07929 070288)

#### **B. BUSINESS ITEMS**

#### 5. AUDIT COMPLETION REPORT 2021/22 FOLLOW UP LETTER

1 - 14

The External Auditor will present **Document "A"** which will be the Audit Follow up letter which will summarise the findings from the audit of the City of Bradford Metropolitan District Council for the year ended 31 March 2022.

#### Recommended -

#### The Committee is asked to:

 note the contents of the Audit Follow up letter detailed in Document "A".

(Cameron Waddell/Nicola Hallas – 07813752053)

#### 6. STATEMENT OF ACCOUNTS 2021/22

15 - 156

The Director of Finance and IT will submit the report **Document "B"** this report will present the 2021-22 audited Statement of Accounts and summarise the key financial points arising.

#### Recommended -

That the 2021-22 statement of accounts are approved by the Governance and Audit Committee.

(Celia Yang – 07977814829)

#### 7. ANNUAL TREASURY MANAGEMENT REPORT 2022/23

157 **-** 178

The Director of Finance and IT will submit report **Document "C"** which will show the Council's Treasury Management activities for the year ending 31 March 2023.

During 2022-23 the minimum reporting requirements were that the full Council should receive the following reports:

- an annual treasury strategy in advance of the year (Governance and Audit Committee 24/03/2022 and Council 17/05/2022)
- a mid-year, (minimum), treasury update report (Governance and Audit Committee 24/11/2022 and Council 13/12/2022)
- an annual review following the end of the year describing the activity compared to the strategy, (this report).

#### Recommended -

That the report Document "C" be noted and referred to full

#### Council for adoption.

(Lynsey Simenton/Mark Russell – 07582102779)

# 8. WEST YORKSHIRE PENSION FUND BOARD MINUTES 21 MARCH 2023

179 **-** 200

The role of the Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme.

The Managing Director of West Yorkshire Pension Fund will submit **Document "D"** which reports on the minutes of the WYPF Pension Board meeting held on 21 March 2023.

#### Recommended -

That the minutes of West Yorkshire Pension Fund (WYPF) Local Pension Board meetings held on 21 March 2023 be considered and noted.

(Yunus Gajra - 01274 432343)

#### 9. INTERNAL AUDIT PLAN 2023/24

201 -224

The Director of Finance and IT will submit report **Document "E"** which will outline the Internal Audit Plan for the financial year 2023/24. The delivery of the audit plan will assist with risks within the systems reviewed being managed to an acceptable level through improvement in internal control.

In addition to the 2023/24 Internal Audit year plan the report identifies an indicative plan for a further two years to highlight the risks that are being monitored

#### Recommended -

That the Committee reviews and approves the Internal Audit Plan for 2023/24 as detailed in Document "E".

(Mark St Romaine - 01274 432888)

# 10. PUBLIC SECTOR INTERNAL AUDIT STANDARD - EXTERNAL REVIEW

225 **-** 248

The Director of Finance and IT will present report **Document "F"** which will provide feedback on the recent CIPFA review to determine the Internal Audit function's compliance with the UK Public Sector

Internal Audit Standards.

#### Recommended -

That the Committee note the report and agree the Improvement Plan included in the CIPFA external quality assessment of the Internal Audit Service as detailed in Document "F".

(Mark St Romaine - 01274 432888)

11. CONSIDERATION OF THE APPOINTMENT OF INDEPENDENT 249 - MEMBERS OR AN ADVISOR TO THE GOVERNANCE AND AUDIT 256 COMMITTEE.

The Director of Finance and IT will submit report **Document "G"** which will provide details around the appointment of independent members or an advisor to Bradford Council's Governance and Audit Committee.

#### Recommended -

- That the Committee recommend to Council that Article 9
  of the Council's constitution be amended so that the
  composition of Governance and Audit Committee
  includes 2 Independent members, subject to a
  recruitment process.
- That the Committee recommend to Council that the recruitment process of the Independent Members be delegated to the Director of Finance and IT in consultation with the Chair of Governance and Audit Committee.

(Mark St Romaine - 01274 432888)

THIS AGENDA AND ACCOMPANYING DOCUMENTS HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER



# Report of External Audit to the meeting of the Governance and Audit Committee to be held on 15 June 2023

A

### Subject:

External audit's follow up letter for the 2021/22 audit of the City of Bradford Metropolitan District Council

#### **Summary statement:**

The Audit Follow up letter summarises the findings from our audit of the City of Bradford Metropolitan District Council for the year ended 31 March 2022.

Nicola Hallas Mazars

Report Contact: Nicola Hallas

Phone: 07881 283 559

e-mail: nicola.hallas@mazars.co.uk

#### 1. SUMMARY

The report outlines the findings from our work on the Council's financial statements that were outstanding at the time of presenting the Audit Completion Report in March 2023.

#### 2. BACKGROUND

Not applicable

#### 3. OTHER CONSIDERATIONS

None

#### 4. FINANCIAL & RESOURCE APPRAISAL

Not applicable

#### 5. RISK MANAGEMENT AND GOVERNANCE ISSUES

None

#### 6. LEGAL APPRAISAL

Not applicable

#### 7. OTHER IMPLICATIONS

#### 7.1 EQUALITY & DIVERSITY

Not applicable

#### 7.2 SUSTAINABILITY IMPLICATIONS

Not applicable

#### 7.3 GREENHOUSE GAS EMISSIONS IMPACTS

Not applicable

#### 7.4 COMMUNITY SAFETY IMPLICATIONS

Not applicable

#### 7.5 HUMAN RIGHTS ACT

Not applicable

#### 7.6 TRADE UNION

#### 7.7 WARD IMPLICATIONS

Not applicable

# 7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)

Not applicable

#### 7.9 IMPLICATIONS FOR CORPORATE PARENTING

Not applicable

#### 7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

Not applicable

#### 8. NOT FOR PUBLICATION DOCUMENTS

None

#### 9. OPTIONS

Not applicable

#### 10. RECOMMENDATIONS

The Governance and Audit Committee is asked to:

• note the contents of our Audit Follow up letter

#### 11. APPENDICES

Audit Follow up Letter

#### 12. BACKGROUND DOCUMENTS

None





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Governance and Audit Committee City of Bradford Metropolitan District Council City Hall Bradford BD1 1UH

19 May 2023

**Dear Audit Committee Members** 

#### City of Bradford Metropolitan District Council

#### Follow-up Letter to our Audit Completion Report in relation to the 2021/22 Audit

As required by International Standards on Auditing (UK), this letter communicates an update on progress on concluding upon those matters that were marked as outstanding within our Audit Completion Report, which was presented to the Governance and Audit Committee on 23 March 2023.

This letter therefore includes:

- Appendix A draft audit report.
- Appendix B summary of further misstatements.
- Appendix C control deficiencies and internal control recommendations.

#### Update on matters previously reported as outstanding

The following matters have now been resolved.

Mazars LLP is the UK firm of Mazars, an integrated international advisory and accountancy organisation. Mazars LLP is a limited liability partnership registered in England and Wales with registered number OC308299 and with its registered office at Tower Bridge House, St Katharine's Way, London E1W 1DD.

We are registered to carry on audit work in the UK by the Institute of Chartered Accountants in England and Wales. Details about our audit registration can be viewed at www.auditregister.org.uk under reference number C001139861.

Audit area	Status	Findings
Property, Plant and Equipment (Valuations)	COMPLETED	Council dwellings: We identified that an incorrect Social Housing Factor had been used in the valuation of Council dwellings. The Council had incorrectly deducted 41% from the gross book value, instead of using 41% as the calculated Existing Use Value. When revisiting the valuations of Council dwellings, officers also updated the valuation to 31 March 2022 (as opposed to 1 April 2021 as had originally been used by the Council).
		The cumulative impact of these errors in the Council's valuation methodology resulted in a total overstatement of the valuation of Council dwellings of £6.1m.
		For one asset selected for testing, the valuation methodology was updated by the Council during the audit. This resulted in the valuation of the asset of £8.6m in the draft accounts submitted for audit being amended to £4.4m in the final version of the accounts. The actual valuation should be £10.8m (this includes an update in the valuation to 31 March 2022). Therefore, there is an unadjusted understatement of the asset of £6.4m. The error in the revised methodology arose as the Council incorrectly applied the social housing factor to this asset.
		The Council has also revisited the application of the social housing factor in 2020/21 and identified that this was also incorrect. The value of the misstatement is an overstatement of £4.6m. Officers are not proposing to amend the accounts for this error. Therefore, we have reported this as an unadjusted misstatement.
		Other land and buildings: For Primary School assets we identified an incorrect formula had been used when calculating the Modern Equivalent Area for these schools. This resulted in the valuation of each primary school being overstated. Furthermore, for assets valued at depreciated replacement cost, we identified that no costs for external works had been included within the valuation. This resulted in valuations for these schools being understated. When revisiting the Depreciated Replacement Cost valuations, officers also updated the valuation to 31 March 2022 (as opposed to 1 April 2021 as had originally been used by the Council).
		Where there was a difference in Net Book Value in excess of £1m as a result of all the errors above, the Council has amended the valuation of the accounts. This resulted in an amendment of £54.8m. For all other assets, an unadjusted misstatement of £4.6m has been identified. Officers are not proposing to amend the accounts for this error. Therefore, we have reported this as an unadjusted misstatement.
		For schools, developed land areas had been overstated by £2.5m due to an incorrect methodology being applied by the Council's valuer. The methodology has now been updated to calculate developed land areas in accordance with the Department for Education guidance.

Audit area	Status	Findings
Property, Plant and Equipment (Valuations) (continued)	COMPLETED	Investment properties: For two investment properties sampled, our testing highlighted that incorrect yields had been used in the valuation which led to a total overstatement of £1.3m. In addition, when we extrapolated this error across the Council's portfolio of investment properties, there was a potential further £3m overstatement of the value. Officers are not proposing to amend the accounts for this error. Therefore, we have reported this as an unadjusted misstatement.
Infrastructure Assets	COMPLETED	We have concluded our work in this area and we are satisfied that infrastructure assets are materially accurate, and that the Council has applied CIPFA's "Update to the Code and Specifications for Future Codes for Infrastructure Assets (Code update)", including any required changes to accounting policies and disclosures.
		Page 3 of this letter provides more details about our findings.
Whole of Government Accounts	In progress	We have not completed our 2021/22 work in this area. The National Audit Office issued its Group Instructions in February 2023. We will work with management to complete this work as soon as possible.
Audit completion and post balance sheet events	In progress	We have substantially completed our closure procedures, including review of the amended accounts. We will discuss subsequent events with management and review available post balance sheet information at the point we are due to sign the audit opinion. We will also review the management representation letter when it is received – a copy of the letter is included as an appendix to our Audit Completion Report.
		If any matters arise from this which we need to report to you, we will issue a further letter.

#### Significant matters discussed with management - Infrastructure Accounting

As part of our review of the Council's application of CIPFA's "Update to the Code and Specifications for Future Codes for Infrastructure Assets (Code update)", we considered the Council's asset lives per accounting policy xvii and Note 9 (property, plant, and equipment) for infrastructure assets.

We considered CIPFA Bulletin 12, which includes a commentary on the useful lives of the components of the highways network by the "UK Roads Leadership Group Asset Management Board". The guidance includes a range of "reasonable useful lives" for different parts of the highways network which we compared to those applied by the Council.

We completed a sensitivity analysis to estimate the impact on in-year depreciation using the Council's existing asset lives compared to the reasonable asset lives provided in the CIPFA guidance. This test was completed to gain assurance that depreciation in 2021/22 is materially accurate when compared to depreciation calculated using CIPFA's reasonable useful lives. Our analysis provided sufficient and appropriate audit evidence that there is no material error and the key information is as follows:

Depreciation – useful life applied	Value (£'000)	Variance to actual depreciation charged (£'000)
Depreciation in note 9a (infrastructure assets)	£13,242	n/a
Depreciation – Mazars estimate using lowest CIPFA life in range (max value)	£20,204	£6,962
Depreciation – Mazars estimate using highest CIPFA life (min value)	£12,730	(£512)

This analysis shows that the depreciation value reported in the Council's accounts is within the range we calculated using CIPFA's reasonable useful lives and does not highlight an estimation error above our performance materiality level of £19.5m for any of the variables used. Based upon our analysis we have sufficient audit assurance that infrastructure depreciation in the 2021/22 financial statements is not materially misstated.

#### Value for money (VFM) arrangements

We are yet to complete our work in respect of the Council's arrangements for the year ended 31 March 2022. Our commentary on the arrangements will be provided in the Auditor's Annual Report within three months of completing our audit of the financial statements.

In addition to the recommendation reported in the Audit Completion Report in March 2023 in relation to Governance, we have identified a risk of significant weakness in relation to financial sustainability.

Risk of significant weakness in arrangements	Criteria	Planned procedures
There is a risk that the Council's financial plans are unsustainable given the heavy reliance on reserves to fund budget pressures in 2022/23 and to balance the budget in 2023/24 and future years.	Financial sustainability	We will review the Council's financial position and the plans it has in place to ensure financial sustainability in the short and longer term. We will consider the Medium Term Financial Plan, the annual budget setting and consider savings plans, as well as hold discussions with officers.

We will report the results of our work on this risk in the Auditor's Annual Report.

If you wish to discuss these or any other points raised on this report then please do not hesitate to contact me.

Yours sincerely

#### **Cameron Waddell**

Key Audit Partner

# Appendix A – Draft Audit Report Wording

To follow

# **Appendix B - Unadjusted misstatements**

		Comprehensive Income and Expenditure Statement		Balanc	ce Sheet	
		Dr (£'000)	Cr (£'000)	Dr (£'000)	Cr (£'000)	
1	Dr Debtors Cr Expenditure			1,216	1,216	
	Being the over provision of the impairment for bad debts overall value of debtors.	of £1.2m, reducin	g the bad debt pro	ovision and incre	easing the	
2	Dr Financing and Investment Income Cr Investment Property	4,258			4,258	
	Being the overstatement of two investment properties whethe extrapolated error across the remaining population.	ere the valuation	has been revisited	d to adjust for th	e yields and	
3	Dr Property, Plant and Equipment Cr Surplus/Deficit on Provision of services		4,559	4,559		
	Being the understatement of assets with errors of less that external works and the primary school MEA calculation.	an £1m as a resul	t of the change in	BCIS index, ad	dition of	
4	Dr Surplus/Deficit on Provision of services Cr PPE – other land and buildings Being the overstatement of schools due to the methodolo accordance with the Department for Education guidance.		to calculate deve	loped land area	2,542 s in	
5	Dr PPE – Council Dwellings Cr Surplus/Deficit on Provision of services Being the understatement in the revised accounts of one	asset classified a	6,373 s Council Dwellin	6,373 gs.		

## Unadjusted misstatements – prior year

		Comprehensive Income and Expenditure Statement		•	
		Dr (£'000)	Cr (£'000)	Dr (£'000)	Cr (£'000)
1	Dr Surplus/Deficit on provision of services Cr PPE – Council Dwellings	4,645			4,645
	Being the error in 2020/21 due to the incorrect social ho	using factor being เ	used for Council	Dwellings.	

# Appendix B - Adjusted misstatements

			ve Income and e Statement	Balanc	e Sheet
		Dr (£'000)	Cr (£'000)	Dr (£'000)	Cr (£'000)
1	Dr Fair value of plan assets Cr Return on plan assets			26,091	26,091
	Being the adjustment in the updated actuary report in recouncil's share of plan assets by £26,091k, reducing the this amount.				
2	Dr Property, Plant and Equipment Cr Surplus/Deficit on provision of services Cr Revaluation Reserve		27,935	54,762	26,827
	Being the understatement of assets with errors greater the external works and the primary school MEA calculation.	an £1m as a resu	lt of the change in	n BCIS index, ac	ddition of
3	Dr Surplus/Deficit on provision of services Dr Revaluation Reserve Cr PPE – Council Dwellings	5,871		6,168	297
	As at 31/3/22 the council dwellings balance is overstated correctly. This amendment also includes the movement in	•	-		

### **Appendix C - Control Deficiencies**

Our findings and recommendations are set out below. We have assigned priority rankings to each of them to reflect the importance that we consider each poses to your organisation and, hence, our recommendation in terms of the urgency of required action. In summary, the matters arising fall into the following categories:

Priority ranking	Description	Number of issues
1 (high)	In our view, there is potential for financial loss, damage to reputation or loss of information. This may have implications for the achievement of business strategic objectives. The recommendation should be taken into consideration by management immediately.	-
2 (medium)	In our view, there is a need to strengthen internal control or enhance business efficiency. The recommendations should be actioned in the near future.	1
3 (low)	In our view, internal control should be strengthened in these additional areas when practicable.	1

#### Description of deficiency – Valuations – Level 2 (medium)

#### **Description of deficiency**

There have been a number of significant errors identified during the course of the audit in relation to the valuation of council dwellings, land, buildings and investment properties.

Errors have also been identified and reported in previous years.

#### **Potential effects**

Asset values are materially mis-stated.

#### Recommendation

The Council should review its processes and controls over its valuations to ensure the correct methodology is being applied.

#### Management response

The Council will review asset valuation methodologies and controls to ensure compliance with accounting policies and guidance.

#### Description of deficiency -Valuation Report -Level 3 (low)

#### **Description of deficiency**

The Council valuer does not provide a valuation report in line with RICS professional standards.

#### **Potential effects**

RICS professional standards are not complied with

#### Recommendation

A valuation report is provided by the valuer to accompany the valuations

#### **Management response**

The completion of a valuation report will be considered by the Council valuer as part of the 2022-24 statement of accounts closedown process.





# Report of the Director of Finance to the meeting of Governance & Audit to be held on 15 June 2023

В

Subject: Approval of 2021-22 audited Statement of Accounts

#### **Summary statement:**

This report presents the Council's 2021-22 audited statement of accounts.

This report also briefly details the key financial points from the accounts.

#### **EQUALITY & DIVERSITY:**

Equality assessments and Equality objectives – There are no equality and diversity implications directly arising from this report.

Christopher Kinsella Director of Finance

Report Contact: Celia Yang Head of Financial Accounting Phone: 07977 814829

Email: Celia.yang@bradford.gov.uk

Portfolio:

Corporate Services

**Overview & Scrutiny Area:** 

**Corporate Services** 

#### 1. SUMMARY

- This report presents the 2021-22 audited Statement of Accounts (Appendix A) and summarises the key financial points arising.
- The recommendation contained in this report is to approve the audited 2021-22 statement of accounts.

#### 2. BACKGROUND

The Accounts and Audit Regulations 2015 set out the requirements for the production and publication of the annual statement of accounts. The Council prepared the draft statement of accounts for 25<sup>th</sup> July 2022.

The statement of accounts is prepared in accordance with proper practices as set out in the CIPFA /LASAAC Code of Practice on Local Authority Accounting in the United Kingdom (the Code) and is subject to scrutiny by the council's external auditor, which for the 2021-22 financial year is Mazars LLP.

#### 3. OTHER CONSIDERATIONS

Following on from 25<sup>th</sup> July 2022, the 2021-22 statement of accounts were externally audited during the months of September 2022 to March 2023.

#### 4. (A) FINANCIAL & RESOURCE APPRAISAL

- The key financial implications as at 31 March 2022 from the 2021-22 statement of accounts are summarised below:
  - Covid The accounts for the financial year 2021-22 reflect the nature of the
    activity that has been undertaken to respond to the pandemic and also the
    continued provision of essential services. The financial pressures of the
    increased and new activity were supported by substantial additional
    Government grant and other funding, meaning that the additional Covid
    related costs and losses were mitigated in the financial year 2021-22.
  - Useable reserves (excluding Capital Receipts and Capital Grants Unapplied) stood at £274.8m (Council £228.2m, and Schools £46.6m) (Page 13, & Note 5 page 38), compared to £299.4m at the end of 2020-21, representing a £24.6m decrease in total useable reserves. The main reason for the £24.6m reduction in Council useable reserves in 2021-22 was COVID-19 related, with the Council drawing down Covid related grants received in 2020-21 to support Council services in 2021-22. This included both funding to support Council service delivery (£27.2m), and also the drawdown of £15.8m from the reserve holding Section 31 grants and Tax income guarantee income to repay 2020-21 Business Rates and Council Tax collection fund deficits as planned. The Council also received some additional Covid related funding in 2021-22, and £11.2m of this has been carried forward to complete Covid related commitments in 2022-23. Unallocated reserves were £10.7m, and General Fund reserves stood at £19.5m. The General Fund Balance is held in accordance with statute; the purpose is as a safety net against

unexpected variations in the Council's annual expenditure – this was £1.3 billion (page 20) as shown in the cost of services in the Comprehensive Income and Expenditure Statement. Earmarked reserves are held to protect against specific risks and commitments.

- The Council spent £104.7m on long term assets, as part of its Capital Programme. £4.2m from the sale of property was both received and used to fund capital spend during the 2021-22 year. £62.8m of spend was financed by grants and other third party contributions, £34.6m from borrowing and the remainder direct revenue contributions.
- The Council holds £60.4m of grants provided by external public sector bodies, which will be used in the future to finance the Capital Programme.
- The Council has £709.2m remaining of borrowing for past spend on capital investment. £146.1m of this borrowing is in the form of contractual Private Finance Initiative liabilities. £3.5m mainly relates to miscellaneous historical debt. £186.9m is temporarily borrowed from the Council's own cash held in earmarked reserves, reducing interest payments. The remaining £372.7m is actual borrowing from the Public Works Loan Board, LOBO'S and short term borrowing.
- Against the £709.2m of borrowing, the Council has £1,060.4m of land, buildings, equipment, other infrastructure and assets held for sale. The value of the Council's property is therefore significantly higher than the outstanding debt relating to it.
- The 2021-22 balance sheet value of the Council's non-current assets (including current assets held for sale and excluding long term debtors) is £1,060.4m. This has increased by £38.5m from the 2020-21 value of £1,021.9m. Capital enhancements to the value of £72.7m were made to these assets during 2021-22 and Assets to the value of £18.6m were disposed of during the year. Also Non-current assets were depreciated by £34.799m during 2021-22. A revaluation programme that included schools, sports centres and investment properties increased values by £19.2m.
- The Council's estimated pension fund deficit has decreased to £870.558m, based on an estimate made in accordance with accounting rules. The overall defined benefit obligation has increased and this has been primarily due to a remeasurement of the fair value of assets following actuarial losses caused by changes in financial assumptions.
- The Council maintains a separate fund for Business Rates and Council Tax, from which it distributes pre-agreed shares to itself, the Government, West Yorkshire Fire and Rescue Authority and the Police and Crime Commissioner. Overall the fund ended 2021-22 with a deficit position for both Business Rates and Council Tax. The Council's own share was a £18.0m deficit on Business Rates, with the Government holding a £18.3m deficit (page 84). The significant Collection Fund deficit for 2020-21 has arisen largely in relation to reductions being applied to business rates. These reductions reflected central government's support for businesses, in

response to the COVID-19 pandemic, by awarding expanded retail discounts and nursery reliefs, meaning that less rates were billed and therefore collectable in 2021-22. The business rates reductions are funded by central government through Section 31 Grants. The compensation is not included in the Collection Fund but is reimbursed to the Council through the General Fund account.

A full analysis of these and other financial issues is included in the Narrative Report which can be found at the front of the accounts.

#### 4 (B) Audit Completion Report

- There are five misstatements in the final accounts have not been adjusted for.

  Three relate to property valuations, one relates to income and spend being accounted for in the incorrect year and an over provision related to the impairment of general bad debt, a decision was taken not to adjust based on materiality.
- With regard to the Infrastructure issue that has caused a National delay in the 2021-22 accounts, detailed analysis has been undertaken. The resultant impact on the disclosure figures for Bradford Council is immaterial therefore figures have not been amended from the draft Statements. Disclosure note format has been amended to comply with statutory override which came into force on the 25<sup>th</sup> December 2022.
- Property valuations have been revised, resulting in an increase in Property, Plant and Equipment valuations of £44.35m.
- Other minor misstatements have been adjusted for.

#### 5. RISK MANAGEMENT AND GOVERNANCE ISSUES

These are addressed in the body of the report.

#### 6. LEGAL APPRAISAL

There are no specific legal issues arising from this report. The production of the Statement of Accounts is a statutory requirement.

#### 7. OTHER IMPLICATIONS

#### 7.1 EQUALITY & DIVERSITY

There are no specific equality and diversity issues arising from this report.

#### 7.2 SUSTAINABILITY IMPLICATIONS

There are no specific sustainability implications arising from this report.

#### 7.3 GREENHOUSE GAS EMISSIONS IMPACTS

There are no specific greenhouse gas emissions impacts arising from this report.

#### 7.4 COMMUNITY SAFETY IMPLICATIONS

There are no specific community safety implications arising from this report.

#### 7.5 HUMAN RIGHTS ACT

There are no specific issues arising from this report.

#### 7.6 TRADE UNION

The Director of Human Resources may advise on this aspect.

#### 7.7 WARD IMPLICATIONS

There are no specific issues arising from this report.

# 7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)

Nil

#### 7.9 IMPLICATIONS FOR CORPORATE PARENTING

There are no specific corporate parenting implications arising from this report.

#### 7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

There are no specific issues arising from this report.

#### 8. NOT FOR PUBLICATION DOCUMENTS

None

#### 9. OPTIONS

Not applicable

#### 10. RECOMMENDATIONS

The 2021-22 statement of accounts are approved by the Governance and Audit Committee.

#### 11. APPENDICES

Appendix A: 2021-22 Statement of Accounts

#### 12. BACKGROUND DOCUMENTS

None





# Statement of Accounts 2021 – 22





#### CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL

#### **STATEMENT OF ACCOUNTS 2021-22**

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#### Introduction to the Council's Statement of Accounts

The Council's financial statements are set out in the pages following this foreword and consist of the following; -

#### 1. The Narrative Report

This report from the Director of Finance summarises the most significant items reported in the accounts and outlines the overall financial position of the Council for 2021-22. There is a distinction between revenue spending (the annual cost of providing services) and capital expenditure, which has a long-term benefit for the citizens of the Bradford district.

#### 2. Movement in Reserves Statement

This statement shows the movement in the year on the different reserves held by the Council, analysed into "usable reserves" (i.e. those that can be applied to fund expenditure) and other reserves.

#### 3. Comprehensive Income and Expenditure Statement

This statement demonstrates the cost in the year of providing services in accordance with generally accepted accounting practices, rather than the amount to be funded in accordance with statute. The Council raises tax and uses grants and other flows of income to cover the cost of services. The statutory financial result is shown in the "Movement in Reserves Statement". This is different to the cost of services stated in accordance with generally accepted accounting practice, as shown in the Comprehensive Income and expenditure account.

#### 4. Balance Sheet

This sheet shows the value at the "Balance Sheet" date of the assets and liabilities recognised by the Council.

#### 5. Cash Flow Statement

This statement shows the changes in cash and cash equivalents (short term investments of three months or less) of the Council during the reporting period.

#### 6. Statement of Significant Accounting Policies

The Council's accounts have followed the International Financial Reporting Standards (IFRS) since the 2010-11 financial year.

The accounting policies set out the specific principles, bases, conventions, rules and practices applied by the Council in preparing and presenting the financial statements. The accounting policies are based on interpretations and adaptations for the public sector set out in the CIPFA (Chartered Institute of Public Finance and Accountancy) Code of Practice on Local Authority Accounting in the United Kingdom ("the Code").

#### 7. Notes to the Main Financial Statements

The notes disclose information required by the Code and information that makes the accounts easier to understand. They show the specific accounting policies and estimates used and breakdowns of figures shown in the main Financial Statements.

#### 8. Collection Fund Statement

The Collection Fund is an agent's statement that reflects the statutory obligation for billing authorities to maintain a separate Collection Fund. The statement shows the transactions of the billing Authority (Bradford Council) in collecting Council Tax and non-domestic Business Rates and distributing it to major preceptors and the Government.

#### 9. The Group Accounts

As the Council does not have any material interests in subsidiaries, associates and jointly controlled entities it is not required to produce a set of Group Accounts.

#### 10. The Pension Fund Account

As the Council is the administering authority for the West Yorkshire Pension Fund, the activities of the fund are required to be reported alongside the Council's main Financial Statements.

#### 11. Glossary of Terms

In order to help readers, a Glossary of Terms, widely used in relation to local authority finance and referred to within these accounts, is included at the end of the document.

#### 12. Annual Governance Statement

The Council is required to undertake an annual review of the effectiveness of its governance framework and system of internal control. The conclusions of this review are reported alongside the accounting statements.

#### **Notes to the Main Financial Statements**

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#### City of Bradford Metropolitan District Council's Statement of Responsibilities

The Council is required to:

- a. Make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this Council, that officer is the Director of Finance
- b. Manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets.
- c. Approve the Statement of Accounts.

#### **Director of Finance & IT Responsibilities**

The Director of Finance is responsible for the preparation of the Council's Statement of Accounts in accordance with proper practices as set out in the CIPFA Code of Practice on Local Authority Accounting in the United Kingdom (the Code).

In preparing this Statement of Accounts, the Director of Finance has:

- d. Selected suitable accounting policies and applied them consistently.
- e. Made judgements and estimates that were both reasonable and prudent.
- f. Kept proper and up to date accounting records.
- g. Taken reasonable steps for the prevention and detection of fraud and other irregularities.
- h. Complied with the Code of Practice on Local Authority Accounting.

In addition, he has issued:

- i. A manual on the practices to be adopted in the preparation of the Council's year end accounts.
- j. Various corporate standards giving guidance on specific accounting issues.

The financial statements are subject to audit by the Council's external auditors.

#### **Certification of the Statement of Accounts**

I certify that this statement of accounts presents a true and fair view of the financial position of Bradford Council at 31 March 2022 and its income and expenditure for the year then ended; and of the West Yorkshire Pension Fund.

Signed:

Christopher Kinsella Director of Finance (S151 officer) Date: 23<sup>rd</sup> March 2023

I certify that this Statement of Accounts was approved by the Corporate Governance and Audit Committee on 23rd March 2023.

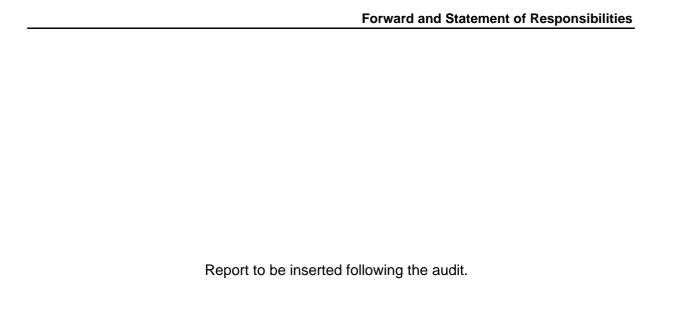
Signed

Cllr Angela Tait
Chair Governance and Audit Committee

Date: 15 June 2023

Independent auditor's report to the members of City of Bradford Metropolitan District Council		
Report to be inserted following the audit.		

Report to be inserted following the audit.



#### The Narrative Report

#### Introduction

The Financial Statements of the City of Bradford Metropolitan District Council for the year ending 31st March 2022 are set out in this document. They are prepared in accordance with the Chartered Institute of Public Finance & Accountancy (CIPFA) Code of Practice on Local Authority Accounting (the Code) which requires that the accounts show a true and fair view of the financial position of the Council. Suitable accounting policies have been adopted and applied consistently. Where necessary judgements and estimates have been made which comply with the Code.

This narrative report explains the main information included in the accounts, gives an overview of the Council as at 31st March 2022 and provides further information about the most significant matters reported in the accounts, along with an analysis of the pressures and risks that may impact on future financial performance.

#### **Narrative report Introduction**

The financial year 2021-22 has been another challenging year. Along with the rest of the country, the Council has had to manage the unprecedented challenges posed by the COVID-19 pandemic.

Since the start of the first national lockdown on 24 March 2020, and indeed in the weeks immediately leading up to the lockdown, COVID-19 has influenced every aspect of the Council's work. Challenging though it has been, the Council has responded well, delivering a wider range of new initiatives as well as continuing to deliver business as usual services, adapting provision to align to the circumstances.

The accounts for the financial year 2021-22 reflect the nature of the activity that has been undertaken to respond to the pandemic but also to continue to provide essential services. The financial pressures of the increased and new activity were supported by substantial additional Government grant and other funding, meaning that the additional Covid related costs and losses were predominantly mitigated in the financial year 2021-22.

The administration of the COVID-19 related expenditure and income losses associated with the Council's service provision, as well as the multitude of different COVID emergency grants received by the Council, supported the Council's services and local businesses and presented additional challenges for the Council's Financial Services team. The extent of the resources received is highlighted later in this document.

This Narrative Statement will cover the impact of COVID in more detail but will firstly outline key information about the District and the Council to provide background context.

#### **Organisational Overview & External Environment**

#### **Our district**

The City of Bradford Metropolitan District Council, working alongside public and private sector partners and communities, to deliver services and democratically accountable leadership to a diverse population in excess of 530,000 people and approximately 16,000 businesses.

The Council strives to secure better outcomes and equality of opportunity for everyone in the district. It employs more than 8,000 staff. The Bradford District is the fifth largest Metropolitan Local Authority District in England. It is the youngest district in the UK, with nearly a third of the population aged under 20. Ethnic minorities form a third of the total population of the district with over 150 languages spoken within the district.

Geographically, our district includes the city of Bradford itself, the large town of Keighley and a number of smaller towns and villages many with their own strong and distinctive identities. Outstanding natural landscapes and vistas complement our historically important architecture alongside a rich heritage and vibrant contemporary cultural scene. Ilkley Moor, Haworth and Brönte Country, Saltaire World Heritage Site and the National Science and Media Museum, amongst numerous other sites, attract up to 10 million visitors each year.

The scale, diversity and productive potential of the district is reflected in its strong, broad-based, innovative and entrepreneurial business community, which is part of an overall local economy worth £9.5 billion, the 11th largest in England.

Bradford District is home to high-value production businesses across a wide range of sectors, including food manufacturing, engineering, chemicals, digital technologies, energy and utilities. Many businesses support international supply chains in sectors such as automotive, construction, finance and health, making us one of the most internationally connected cities in the UK. The University of Bradford is a hive of technological innovation.

We are proud to be identified by Barclays Bank as the best place in Britain to start a business, named as one of the Sunday Times' top 20 places to do business, and identified as the most improved city in the Price Waterhouse Cooper's Good Growth 2019 Index. The district has a strong and committed network of voluntary and community organisations with an estimated

30,000 regular volunteers and 100,000 occasional volunteers. The spirit of our communities is a tangible asset that we want to work on more with people in the future to develop and deliver our shared objectives.

Public services and the voluntary and community sector have a strong track record of working together in mature and effective partnerships, and the district's work to bring communities together and promote participation is among the most innovative to be found in the UK.

This spirit has recently helped Bradford win the competition to be UK City of Culture 2025.

While the Council and its partners have a wealth of assets to hand, the district, like other districts of commensurate size and complexity, faces major and persistent challenges, as follows:

- Poverty: Whilst the district includes some of the most affluent areas in the north of England, the Bradford District is the fifth most income-deprived in the country. Some 266,000 people live in the poorest areas, and nearly one third of our children live in poverty. Fuel poverty affects 13.5% of households. Health inequalities persist and the gap in life expectancy between the wealthiest and poorest areas of the district is around nine years for men and around eight years for women. These levels of poverty and inequality are unacceptable and consequently increase the demand for public services.
- Connectivity: We need to do more to improve transport connectivity between Bradford, Keighley and Shipley. Bradford is the largest city in the UK not on a mainline rail station and travel times between all parts of the district and indeed the wider north are unacceptable.
- Education and Skills: While progress has been made in closing the gap in educational attainment between the
  district and the national average it has not gone far enough or fast enough and the adult skills base remains
  relatively low as a consequence. This ultimately affects productivity and potential inward investment decisions.
- Resources: The district has high levels of need and demand for public services but the Council has limited ability to
  raise income locally. Our Band D Council tax is 8% below the average for Metropolitan authorities and 80% of our
  households are below Band D.

#### **About the Council**

The policies of the Council are directed by the political leadership and implemented by the Corporate Management Team and officers of the Council. There are 90 Councillors who are elected by local residents on a ward by ward basis.

The make-up of the Council is:

- 52 Labour
- 21 Conservative
- 6 Liberal Democrat
- 6 Green
- 2 Bradford South Independents
- 2 Independent
- 1 llkley Independent

The Labour Party are the ruling party and the lead Labour Party Councillors form the Executive.

The Annual Governance Statement that accompanies the financial statements provides further detail on the Council's governance.

#### The Council Plan 2021-2025

The Bradford Council Plan is a working document for what this Council wants to achieve to create as good a quality of life as possible for the people and communities of Bradford District. The plan was subject to public consultation and has been agreed by both the Council's Executive and Full Council.

The Council Plan 2021-2025 builds on some of the same priorities as the 2016–2020 plan but also looks to address some new major challenges that our district will face in the coming years. These include responding to and recovering from the COVID-19 pandemic; and following the Council's declaration of a climate emergency, taking the steps we need to take to deal with that emergency and to continue to build on sustainable delivery.

Further detail about the Council Plan can be found via this link <a href="https://www.bradford.gov.uk/council-plan/council

#### **Our Priority Outcome Areas**

The Council Plan helps to set our priorities and inform our future budget and medium-term financial strategies. We have placed a fair, inclusive and sustainable recovery at the heart of this.

In terms of future activity each of our priority areas are divided into two sections:

- a) Living with COVID-19 how we help our residents, businesses and places overcome the ongoing challenges presented by the coronavirus pandemic.
- b) Building a Better Future how we work to secure a better long-term future for the district, its people, its communities and its businesses.

Our main priority outcomes are as follows:

- Better Skills, More Good Jobs and a Growing Economy We will grow our local economy in an inclusive and sustainable way by increasing productivity and supporting businesses to innovate, invest and create great jobs.
- **Decent Homes** We want everyone to have a comfortable home which meets their needs and helps them lead fulfilling lives.
- Good Start, Great Schools We will help our children to have the best start in life by improving life chances, educational attainment and overall quality of life for all young people regardless of their background.
- Better Health, Better Lives We will help people from all backgrounds to lead long, happy and productive lives by
  improving their health and socio-economic wellbeing.
- Safe, Strong and Active Communities We want the Bradford District to be a place where everyone can play a positive role in their community and be proud to call the district their home.
- A Sustainable District We will make it easier for individuals, households and businesses to adapt, change and innovate to help to address the climate emergency, reduce carbon and use resources sustainably.
- An Enabling Council We will be a council that is a great place to work and reflects the communities we serve. Our people will have the tools to do their jobs effectively. We will manage our resources well and seize all opportunities to bring funding into the district. We will provide good, accessible services.

In addition, the Council's work will be underpinned by the following cross-cutting principles:

**Equalities** must be at the heart of all that we do: This means that everyone can access services regardless of their background, that we embrace our different communities across the whole district and that we build an inclusive organisation. We want to be an organisation which actively recognises the contribution that people from different backgrounds make to all aspects of the Council's work and the district's communities. Our Equality Objectives are published alongside the Council Plan and feature across our outcome areas. Our Equality Objectives and accompanying Equality Plan for the period 2020-2024 will outline how we intend to keep equalities at the heart of all we do.

**Working together:** We will work with our communities to get them involved at every opportunity. We will empower individuals so that they can be involved in the process of designing how outcomes are achieved. We will collaborate with other public sector organisations and our communities to ensure residents and businesses have the best opportunity to reach their potential. Together we will be strong, creative, innovative and effective, compassionate and thoughtful, delivering the very best services for all. We recognise that no single organisation can achieve our priority outcomes alone and that partnership and working together will be central to success.

**Early help and prevention**: This means we will support people early and in their communities to prevent their needs from escalating and to improve their outcomes. This will reduce demand on services and improve the quality of life of individuals. We will be supported in delivering on this cross-cutting principle through our Early Help Board Strategy and Action Plan.

**Every pound counts**: We will adopt effective and value-for-money approaches to service delivery. We will increase the proportion of Council resources spent locally to help grow the Bradford District economy and develop our local supply chains. We will ensure that services are creative, innovative and effective to provide the best outcomes for our residents and businesses. Working with others, we will ensure we get the best and most effective value for every pound spent in Bradford District. Internally the Council has a number of strategies and plans in place, such as our Financial Strategy, our Procurement Strategy and our Council Workforce Plan.

**Living Well:** We will work alongside our communities and our partners in the NHS, independent sector and Voluntary and Community Sector, to embed Bradford's Living Well, whole systems approach to improving health and wellbeing for everyone. With energy and commitment, we will actively pursue the Living Well mission – to make it easier for people in the district to adopt healthier lifestyle behaviours – and in doing so, reduce preventable health conditions, (including childhood obesity), reduce premature deaths and increase the number of years that the district's people live in good health and wellbeing.

**Safeguarding:** Bradford District will work with partners and communities to do everything it can to ensure that children and adults at risk in the District are kept safe. We will work together to deliver this principle in collaboration with our children's and adult's safeguarding board. This is not just a role for professionals in social care, but will be part of everyone's role in the Council.

Further detail about the Council Plan can be found via this link https://www.bradford.gov.uk/council-plan/council-plan/

#### 2022-2023 and beyond

In support of the Council Plan, the Council sets a Medium Term Financial Strategy (MTFS) in September of each year, in preparation for setting the following year's budget.

The MTFS aims to balance the cost of achieving desired objectives against available financing. These desired objectives support the Council Plan and other strategies, are summarised across key outcomes.

Inflation, demographic growth, and the additional pressures in Adults and Children's' Social Care, coupled with the significant uncertainty surrounding the ongoing impact of COVID19; delays to the Government's Fair Funding review, and Social Care funding review, mean that financial planning is currently very challenging.

Many councils across the country are now experiencing very severe financial challenges. Whilst the challenges for the Council are significant, through sound financial planning, maintaining relatively robust levels of reserves, and in year management, the Council remained in relatively strong financial health in 2021-22. The current inflationary environment and Children's Social Care issues are however making the outlook more challenging still.

We have assessed all our contracts and procurements to assess links with the Ukraine War / Russia, this has not resulted in any changes to the Council's valuation of assets and liabilities. However, the Council is seeing the impact through the increased cost of essentials, such as energy. The invasion of the Ukraine occurred on the 24<sup>th</sup> February 2022 therefore it is anticipated that the increased cost pressures will more prominent in the 2022-23 expenditure.

## **Financial Performance**

## Revenue Outturn 2021-22

The Council's General Fund budget for its own net expenditure was set at £385m in 2021-22.

Band D Council Tax (excluding both Police and Fire Authority precepts), was set at £1,499, a 2.99% increase on the previous year. Comprehensive revenue and capital budget monitoring is carried out during the year and is supplemented by quarterly finance position statements presented to the Executive. This robust financial management has helped the Council to maintain good financial health, despite continuing pressures on the public sector generally.

As outlined in reports to Executive throughout the year, the COVID-19 pandemic has had a significant impact on the Council's financial position. The overall financial effect on the Council is complex, with various grant funds being received from numerous Government departments. Overall, it is estimated that the total impact on Council services of Covid will was approximately £74m in 2021-22. This was in addition to the £92m of additional costs and income losses in 2020-21. £11.2m of wholly funded Covid related expenditure is also expected in 2022-23.

Most of the financial impact on the Council was mitigated by Government grants and other income in 2021-22, including Emergency Grants, the Contain Outbreak Management Fund and the Sales Fees and Charges compensation scheme, and additional funding for business grants, along with funding from the CCG for hospital discharge amongst others.

Despite these additional funding streams, the ongoing impact in future years is still expected due to a range of issues, including the longer term impacts on individual residents leading to an increase in the cost of care.

In addition, a potential loss of both Council Tax and Business Rates income is to be expected as some residents and businesses struggle to recover from the pandemic.

In addition to the direct financial consequences of the pandemic, in terms of additional expenditure and lost income, staff time and effort throughout the year has been dedicated to supporting residents and communities. This has resulted in attention being diverted away from more business as usual activity, including the actions needed to deliver savings and manage some of the underlying budget pressures being experienced in Adults & Children's Social Care.

We are also seeing a rise in both Adult and Children's Social Care costs as a direct result of the pandemic. These are national issues that are not unique to the Bradford District, and the combination of increased costs and delays in achieving savings is having a detrimental impact which threatens to adversely impact the Council in future years.

Despite the challenges, the Council balanced £385m net expenditure budget in 2021-22. Although this was a good result overall, the position did include some significant overspends, most notably in Children's Social Care, and there remains considerable financial challenges looking ahead into 2022-23 and beyond.

### **Net Revenue Budget**

	Gross Budget £m	Net Budget £m	Variance £m
Health and Wellbeing	251.9	120.7	1.0
Children's Services	529.5	137.9	15.5
Department of Place	201.9	125.1	-1.7
Corporate Resources	212.5	55.7	-0.5
Chief Executive	5.7	5.2	-0.3
Non Service Budgets	21.6	-48.8	-0.1
General Fund	12.4	-10.5	-13.9
Total Council	1,235.5	385.4	0.0

#### Reserves

At 31st March 2022 useable reserves (excluding Capital Grants Unapplied and Capital Receipts) stood at £274.8m (Council £228.2m, and Schools £46.6m), compared to £299.4m at the end of 2020-21, representing a £24.6m decrease in total useable reserves. Unallocated reserves were £10.7m, and General Fund reserves stood at £19.5m.

	Closing Balance 2019-20 £m	Closing Balance 2020-21 £m	Net Movement	Closing Balance 2021-22 £m
Council Earmarked reserves	192.0	241.6	-32.9	208.7
General Fund Reserve	15.0	15.0	4.5	19.5
Council Reserves	207.0	256.5	-28.4	228.2
Schools balances	31.9	42.9	3.7	46.6
Total	238.9	299.4	-24.7	274.8

The main reason for the £24.7m reduction in Council useable reserves in 2021-22 was COVID-19 related, with the Council drawing down Covid related grants received in 2020-21 to support Council services in 2021-22. This included both funding to support Council service delivery (£27.2m), and also the drawdown of £15.8m from the reserve holding Section 31 grants and Tax income guarantee income to repay 2020-21 Business Rates and Council Tax collection fund deficits as planned. The Council also received some additional Covid related funding in 2021-22, and £11.2m of this has been carried forward to complete Covid related commitments in 2022-23.

The total value of revenue balances held by maintained schools at the end of 2021-22 also increased by £3.7m to £46.6m. This was mainly due to underspends on the high needs block of the Dedicated Schools Grant. There are a number of factors that contributed to this increase, including the impact of COVID-19 where planned activity (and planned spending) has been delayed into 2022-23.

Useable reserves and reserve movements are reported to the Executive during the year as a part of the Quarterly Finance Position Statements.

The Council takes a risk based approach to the management of useable reserves. As part of setting the annual budget the s151 Officer undertakes a review of risks and known commitments to calculate a minimum level for the General Fund reserve. For 2021-22, it was determined that a level of £19.5m was the appropriate figure in line with recommended practice.

Overall, reserve levels are expected to reduce significantly in 2022-23.

The Council has £11.2m of Covid related reserves from 2021-22, which will be drawn down in 2022-23 to complete committed Covid related expenditure as outlined previously.

Additionally, c£17.9m (£16.1m NDR, £1.8m Council Tax) of S31 Business Rates Grant Reserve that contains both the Councils share of Section 31 grants and Tax Income Guarantee Scheme compensation will be drawn down at 2022-23 year-end to fund the remaining spreading of the 2020-21 Collection fund deficits, and the repayment of the 2021-22 deficit.

The 2022-23 budget has also approved further reserve reductions of approximately £13.65m.

Service departments will also drawdown from useable earmarked reserves for committed expenditure in line with plans.

In addition to useable reserves, the Council also has a number of other accounting reserves, and these are detailed in the Movement in Reserves Statement with the corresponding notes providing further explanation.

### **Non-Current Assets**

The council holds various non-current assets which are categorised as follows: -

- Property, plant and equipment (PPE) this includes council dwellings, land & buildings, infrastructure assets, community assets, surplus assets, assets under construction and tangible plant, vehicle and equipment assets
- Intangible assets
- Heritage assets
- Investment property
- Assets held for sale

The accounting standard IFRS 13 Fair Value Measurement was adopted by the Council in 2015-16. In accordance with this accounting standard, the council's Investment Properties and Surplus Assets are valued at fair value and measured at their highest and best use. Assets Held for Sale are measured at the lower of the carrying value on reclassification to this category, or the fair value less costs to sell.

The fair value measurements are carried out in accordance with IFRS 13. All other property, plant and equipment assets, with the exception of assets under construction and infrastructure assets, are carried at current value. Further details of the measurement bases used are provided in the accounting policies section.

Infrastructure assets and Vehicles, Plant and Equipment are measured at depreciated historic cost, whilst assets under construction are measured at historic cost. Heritage assets are measured at market value where this exists, or replacement cost. Intangible assets are measured initially at cost and then usually carried at amortised cost. The Valuation techniques adopted for each category of non-current assets are in accordance with the requirements set out in the CIPFA Code of Practice

The 2021-22 balance sheet value of the Council's non-current assets (including current assets held for sale and excluding Long term debtors) is £1,060.4m. This has increased by £38.5m from the 2020-21 value of £1,021.9m. Capital enhancements to the value of £72.7m were made to these assets during 2021-22 and Assets to the value of £18.6m were disposed of during the vear.

Non-current assets were depreciated by £34.9m during 2021-22. This figure includes amortisation of intangible assets and impairment. Valuations on the Council's properties are carried out by qualified valuers within the council's Asset and Property Management Team. A revaluation programme exists which set out when each category of Asset will be valued and during 2021-22 this programme included schools, sports centers and Children's Centres.

## **Risks and Opportunities**

A key issue for the Council is Children's Social Care which has seen significant growth in budget in recent years. However, the budget overspent significantly again in 2021-22 due to high levels of Agency Social Workers and increased Child Looked After placements, and this pressure is likely to persist in future years. A Local Authority Controlled Children's Company will be set up from April 2023.

At the time of writing, the war in Ukraine, and other factors are leading to inflation levels not seen for decades, and this will lead to numerous additional financial pressures in 2022-23 and beyond.

The COVID 19 pandemic has also been a nationwide issues and the district has been significantly impacted. As the 2021-22 year progressed restrictions were lifted, and by the end of the year, everyday life for many started to look like the pre-pandemic normal again.

There remains however, a wide range of uncertainties, not least the continued recovery of the economy and the impact on the district of the changing way residents choose to live their lives. At this stage we do not know whether previously seen levels of car parking, sports and culture income, and other sales, fees and charges will return to pre-pandemic levels, or what the impact of COVID will be on the cost of Adults and Children's social care, mental health services and waste services in particular for the district.

Uncertainty continues about the longer-term financial aftermath of COVID-19. For the district this could impact on a huge variety of areas affecting residents and businesses.

Ensuring that there is a strong link between the capital and revenue budgets to support the delivery of council priorities is essential.

The Capital Strategy sets out continuing significant capital investment, and details regarding some of the major capital schemes that will impact on the economy of the District. At a time of significant funding uncertainty and rising demand it is absolutely essential to set a prudent, stable and achievable budget.

Many councils across the country are now experiencing very severe financial challenges. Whilst the challenges for this council are significant, through sound financial planning, and in year management, the Council remains in robust financial health in 2021-22.

In response to a shift in demand led expenditure pressures and reductions in grant funding, the Council is taking steps to enable itself, residents and communities to work together as equal partners to meet their future needs and priorities. In terms of investment, the Council continues to spend a significant amount of its budget on protecting vulnerable people through its Social Care services.

In 2021-22 the net cost of Adult & Children's Social Care was £243m, 63% of the Council's net budget, and these costs are currently growing at an unsustainable rate. The scale of future challenges will inevitably impact on services and residents to some extent. In considering what savings can be made we have taken long term approaches to the development of future services and this approach will help to protect the needs of the most vulnerable people in the district.

The budget process for 2021-22 adopted a risk-based approach, and in particular prioritised statutory services to vulnerable children, and key frontline services.

Alongside the revenue budget, there are proposals for further major investment in a variety of schemes. These continue the Council's approach to prioritise investment in the local economy, regeneration, climate change initiatives and to invest to save. In addition, the Council is continuing to make a significant investment in Information and Communications technology (ICT), recognising that the need for high quality technology will be crucial to delivering services in the most effective manner in the future.

Being the UKs City of Culture in 2025, will provide an opportunity for the district to showcase its unique culture and heritage, and to attract investment into the district.

## **Key Performance Indicators**

The Executive for the Council Plan (2021-25) agreed a core set of indicators to help monitor the council priorities and these provide the structure for performance updates in this report. The indicators have been grouped around the outcome areas included in the Council Plan Further detailed performance information is provided to the Executive at:

https://bradfordintranet.moderngov.co.uk/documents/s34309/Document%20J.pdf

## **Business Rates and Council Tax**

All Council Tax and Business Rates are paid into a separate ring-fenced account called the Collection Fund. Prior to the start of any year's collection, the amounts paid out of the fund are agreed in advance, to enable budgets to be set. Amounts are paid out to the Council but also to preceptors: The Government, the West Yorkshire Fire and Rescue Authority and the Police and Crime Commissioner. The difference between the amounts paid out and collected are recovered in following years.

The Council was a member of the North and West Yorkshire Business Rates Pool in 2020-21. The pool is a voluntary arrangement which allows local authorities to retain locally a proportion of any growth in business rates income. The pool was established on 1st April 2020 with the aim of furthering economic development activities across the region. It is funded from "levies" on business rates growth which would otherwise be paid over to central government.

In this scheme the pool retains 50% of retained business rates. However, it also increases financial risk to the Council through additional liabilities in respect of backdated appeals and risks from non-collection. The operation of the pool is governed by a formal agreement between the authorities. The pool is led by a Joint Committee made up of the leaders from some of the authorities and is administered by Leeds City Council.

The Joint Committee is responsible for making decisions about the use of pool receipts. At the end of 2020/21 the pool was revoked and a new pool of the Leeds City Region was established in 2021-22, retaining 50% of business rates.

The Collection Fund is an agent's statement. The Council is required by statute to maintain this separate fund for the collection and distribution of amounts due in respect of Council Tax and Business Rates.

The pandemic has caused significant swings for Council Tax and Business Rates collection, over the past two years. But also there have been significant changes to the way these schemes work. The financial impacts are looked at in more detail below.

On Council Tax, as were emerge from the Covid 19 pandemic, the pressure and risks are from the increased costs of living, which may result in a higher level of uncollected debt. Employment has risen, decreased the cost of the Council Tax Reduction scheme (previously called Council Tax benefit) from around 32,000 to around 30,000 recipients at 31<sup>st</sup> March 2022. Housebuilding has started to recover with a net gain in properties of 1,046 during 2021-22.

Overall, there was a Council Tax collection fund deficit of £2.3m in 2021-22, of which the Council's share was £1.9m.

Business Rates collection has also been significantly impacted by the pandemic. However, the Council has a relatively high needs assessment compared to its collection; and since the difference is funded by a Government Top Up grant, this reduces the collection risk compared to other Councils. Additional pandemic reliefs have been issued in 2021-22, therefore, this aspect of the collection is de-risked, because it was also funded by the Government as a grant.

Overall, there was a Business Rates collection fund deficit of £36.8m at 31st March 2022 of which the Council's share was £18m. The Council has received Section 31 grants from the Government in 2021-22 to compensate for the additional reliefs

provided to businesses. Overall, the Council's share of the Collection Fund deficit from 2021-22 will be materially covered by grants.

Further details about the Collection fund can be found in the Collection Fund Section of these accounts.

## **Capital Expenditure**

The Capital Investment Plan deals with investment in land, buildings and equipment that brings benefits to the Council for more than one year. In contrast costs that are used up on an on-going basis are dealt with in the revenue budget, for example the payment of salaries to staff for a library.

The Capital Investment Plan originally budgeted 2021-22 spend at £254.9m (Full Council, 18 February 2021). This budget was re-profiled to £133m in the 1st quarter monitoring report (Executive, 6th July 2021). Since the agreement of the 2021-22 budget, in the first monitoring report the only changes to budgets have been for new approved schemes and the budget in the 4th quarter monitoring report was £172.7m with the spend forecast being £111.2m (Executive, 5 April 2022).

Against the latest re-profiled budget of £172.7m, the Outturn was £104.7m. This is summarised by Department, including some of the major schemes, in the Table below.

Capital Expenditure	2021-22	
Department and Schemes	Major Schemes	Total Spend
•	£000	£000
Health and Wellbeing		1,167
BACES Disabled Facilities Grant	638	
Community Capacity Grant	352	
Children's Services		16,227
Primary Schools Expansion Programme	612	
Devolved Formula Capital	972	
Capital Maintenance Grant	2,093	
Secondary School Expansion	145	
Silsden School	6,296	
SEN School Expansion	2,898	
PFI	1,841	
Place – Economy and Development Services		14,589
New Affordable Housing	215	
Dev of Equity Loans	468	
Disabled Housing Facilities Grant	4,741	
Empty Private Sector Homes Strategy	975	
Towns Fund	1,518	
Conditioning House & High Point Grant	1,439	
City park	1,852	
City Centre Market	3,212	
Place – Planning, Transport and Highways		38,666
Capital Highways Maintenance	3,712	
Challenge Fund	681	
West Yorkshire Transport Fund	5,411	
Smart Street Lighting	4,279	
Clean Air Zone	11,119	
Transforming Cities Fund Programme (TCF)	5,163	
Safer Roads	1,086	
Potholes	4,186	
Place – Other		14,502
Replacement of Vehicles	2,919	
Bereavement Strategy	2,549	
Parks & Play Spaces	839	
Wyke Community Sports Hub	5,271	
Lister Park Playable Spaces	588	
Corporate Resources		19,555
Property Programme	2,502	
Godwin Street	5,758	
Bradford LAD1 Scheme	3,775	
Coroner's Court and Accommodation	2,415	
IT Infrastructure	2,543	
Total		104,706

Where the money came from to pay for the spending on capital schemes in 2021-22:

The Council can borrow to fund capital investment. It sets and observes a range of indicators covering the level of capital expenditure and the cost of financing it, to ensure borrowing is responsible and affordable. One such measure is the Council's Capital Financing Requirement, which represents the amount of Council's capital expenditure funded by internal or external borrowing. In 2021-22 it increased from the level in 2020-21 of £698.763m to £709.246m.

The main reason for the increase in the Capital Financing Requirement was the higher capital spend increasing the amount of spend funded by borrowing.

Other than borrowing, the Council receives capital grants towards some projects, reinvests its capital receipts, or uses revenue resources to fund capital spending.

In 2021-22 the capital spending of £104.7m was funded as follows:

- £34.6m (33%) by borrowing generating capital financing charges which will form part of future revenue spending.
- £62.8m (60%) from government and other grants.
- £2.9m (3%) from revenue contributions and other revenue reserves.
- £4.2m (4%) from capital receipts from the sale of land and buildings.
- £0.2m (0%) from other Finance Leases.

Looking ahead, the Council is progressing with some major regeneration schemes including the Bradford Live Music venue in the former Odeon building, the new Market on Darley Street and One City Park office accommodation.

#### **Schools**

In recent years, the value of Property, Plant and Equipment shown on the Balance Sheet has been volatile due to changes in convention about how to account for education assets and the ability of the Council to control the assets and influence future service potential.

Where the Council directly owns a school or where the School Governing body own the assets or have had rights to use the assets transferred to them, the school is recognised on the Balance Sheet. Community Schools are owned by the Council and are therefore recognised on the Balance Sheet.

Of the Council's Voluntary Aided and Controlled schools, the majority are owned by the respective Diocese with no formal rights to use the assets passed to the School or Governing Bodies. The schools are owned by trusts run by religious organisations and provision is available by the extended goodwill of the trust. As a result, these schools are not recognised on the Balance Sheet.

Where the ownership of a Trust/Foundation School lies with a charitable Trust, including Academies, the school is not recognised on the Council's Balance Sheet.

There are six Foundation schools where as the ownership lies with the School/Governing Body the school is recognised on the Council's Balance sheet. The Council considers it exercises sufficient control over the school governing bodies to warrant recognition of any school where ownership is invested in the governing body.

In 2021-22 one Voluntary Aided school converted to an Academy, and one Academy School completed a 125-year lease for Building and land asset. The Council is not recompensed for any of these disposals. The table below categorises all Bradford schools and sets out the current accounting treatment.

Type of school	2020/21	2021/22	Accounting Treatment
Community	45	45	On Balance Sheet
Special Schools	3	3	On Balance Sheet
Foundation	7	7	Church of England School     Off Balance Sheet, 6 owned by     Governing Bodies are on     the Balance Sheet
Voluntary Aided	14	13	Off Balance Sheet
Voluntary Controlled	6	6	Off Balance Sheet (with the exception of 2)
Academies	114	115	Off Balance Sheet
Trust	2	2	Off Balance Sheet
TOTAL SCHOOLS	191	191	
Nurseries	7	7	On Balance Sheet

For further information on how the Council decides which schools should be included on its Balance Sheet see the Critical Judgements in Applying Accounting Policies on page 35.

## **Treasury Management**

The Council 's year-end treasury debt position for 2021-22 compared to 2020-21 is summarised in the table below:

	31 March 2021 Principal £'m	31 March 2022 Principal £'m
Fixed rate funding:		
-PWLB	297.8	292.3
-Market	36.2	36.2
-Other	0.4	0.4
PFI and other finance leases	154.9	146.9
Short term borrowing	0.0	37.0
Total debt as per Treasury Management Outturn Report	489.3	512.8
In year carrying value adjustment	1.6	1.6
Salix Loan	-	5.2
Total Debt as at 31 March	490.9	519.6

£ 5.511m of loans matured in January 2022 with an average rate of interest of 9.25%. Due to the high cash balances no new loans were undertaken this year. The Council maintained an average balance of £174m of internally managed funds. The internally managed funds earned an average rate of return of 0.135%.

## **Pensions**

The Council is a member of, and the administering authority for, the West Yorkshire Pension Fund (WYPF). The Council's overall net pensions liability is £870.558m (a decrease from £1,234.891m in 2020-21). The decrease in the overall net pensions liability has been primarily caused by actuarial gains on the present value of the defined benefit obligation due to changes in financial assumptions, and remeasurement gains on the fair value of assets. Further details can be found in Note 27, Defined Benefit Pension Schemes. Whilst the overall net pensions liability figure is substantial, it should be remembered that:

- It is not an immediate deficit that needs to be met now. The sum is the current assessment taking a long-term view of the future liabilities for existing pensioners and current employees who are accruing pension entitlement.
- It is not a situation unique to Bradford or Local Authorities generally. Pension funds in both public and private sectors are similarly in a net liability situation.
- The West Yorkshire Pension Fund is regularly reviewed and provision has been made for additional contribution to address the deficit over a period of years.
- Employee contribution rates may change as may the method of calculating accrued benefits and, therefore, liabilities.

The net liability is matched by an appropriate accounting entry under Reserves.

## **Movement in Reserves Statement**

This Statement shows the movement in the year on the different reserves held by the Council, analysed into "usable reserves" and other reserves. The closing 31 March 2022 General Fund Balance of £66.073m comprises £19.5m (£15m in 2020-21) balances generally available to the Council and £46.573m (£42.863m in 2020-21) cash balances held on behalf of schools under the Local Management Scheme.

The deficit on the Provision of Services line of £62.497m (deficit of £39.294m in 2020-21) within the Comprehensive Income and Expenditure account is reversed out of usable reserves into unusable reserves. This is because by statute many of the accounting transactions making up the deficit cannot be charged against the General Fund Account. Unusable reserves have increased by £412.066m (decrease of £224.719m in 2020-21).

	General Fund Balance	Earmarked General Fund Reserves	Capital Receipts Reserve	Capital Grants Unapplied	Total Usable Reserves	Total Unusable Reserves	Total Counci Reserves
					Note 5 & Balance Sheet	Note 20 & Balance Sheet	Balance Sheet
	£000	£000	£000	£000	£000	£000	£000
Balance at 31 March 2020	46,922	192,032	-	33,630	272,584	(738,280)	(465,696)
Movement in reserves during 2020-21							
Surplus/(deficit) on provision of services	(39,294)	-	-	-	(39,294)	-	(39,294)
Other Comprehensive Income and Expenditure  Total Comprehensive Income	-	-	-	-	-	(120,292)	(120,292)
and Expenditure	(39,294)	-	-	-	(39,294)	(120,292)	(159,586)
Adjustments between accounting basis & funding basis under regulations (Note 4)	99,757	-	-	4,670	104,427	(104,427)	-
Net Increase/Decrease (-) before transfers to Earmarked Reserves	60,463	-	-	4,670	65,133	(224,719)	(159,586)
Transfers to/from Earmarked Reserves (Note 5)	(49,522)	49,522	-	-	-	-	-
Increase/Decrease (-) in 2020-21	10,941	49,522	-	4,670	65,133	(224,719)	(159,586)
Balance at 31 March 2021	57,863	241,554	-	38,300	337,717	(962,999)	(625,282)
Movement in reserves during 2021-22							
Surplus/(deficit) on provision of services	(62,497)	-	-	-	(62,497)	-	(62,497)
Other Comprehensive Income and Expenditure	-	-	-	-	-	472,111	472,111
Total Comprehensive Income and Expenditure	(62,497)	-	-	-	(62,497)	472,111	409,614
Adjustments between accounting basis & funding basis under regulations (Note 4)	37,884	-	159	22,002	60,045	(60,045)	-
Net Increase/Decrease (-) before transfers to Earmarked Reserves	(24,613)	-	159	22,002	(2,452)	412,066	409,6914
Transfers to/from Earmarked Reserves (Note 5)	32,823	(32,823)	-	-	-	-	-
Increase/Decrease (-) in 2021-22	8,210	(32,823)	159	22,002	(2,452)	412,066	365,264
Balance at 31 March 2022	66,073	208,731	159	60,302	335,265	(550,933)	(215,668)

## **Comprehensive Income and Expenditure Statement**

This statement shows the accounting cost during the year of providing services in accordance with generally accepted accounting practices, rather than the amount to be funded from taxation. Authorities raise taxation to cover expenditure in accordance with regulations; this may be different from the accounting cost. The taxation position is shown in the Movement in Reserves Statement.

	2020-21	2020-21	2020-21	2021-22	2021-22	2021-22
	Gross Expenditure	Gross Income	Net Expenditure	Gross Expenditure	Gross Income	Net Expenditure
	£000	£000	£000	£000	£000	£000
Health and Wellbeing	267,311	(146,548)	120,763	285,581	(161,674)	123,907
Children's Services	497,084	(394,014)	103,070	549,901	(411,604)	138,297
Department of Place	172,882	(48,497)	124,385	210,009	(79,448)	130,562
Chief Executive	6,505	(1,091)	5,414	5,734	(635)	5,099
Corporate	191,271	(136,695)	54,576	189,355	(125,497)	63,858
Non Service Budgets	21,282	(12,305)	8,977	17,964	(16,895)	1,069
Central Budgets	27,919	(6,987)	20,932	26,507	(1,810)	24,697
Cost of services	1,184,254	(746,137)	438,117	1,285,052	(797,563)	487,489
Other Operating Expenditure (Note 8a)	1,104,234	(140,137)	14,309	1,203,032	(191,303)	17,381
Financing and Investment income and expenditure (Note 8b )			67,177			54,919
Taxation and non-specific grant income (Note 8d)			(480,309)			(497,292)
Surplus (-)/Deficit on Provision of Services			39,294			62,497
Surplus (-)/Deficit on revaluation of non-current assets (Note 20a)			(6,946)			(19,051)
Remeasurements of the net defined benefit liability (Note 20d)			127,238			(453,060)
Other Comprehensive Income and Expenditure			120,292			(472,111)
Total Comprehensive Income and Expenditure			159,586			(409,614)

## **Balance Sheet**

The Balance Sheet shows the value as at the Balance Sheet date of the assets and liabilities recognised by the Council. The net assets of the Council (assets less liabilities) are matched by the reserves held by the Council. Reserves are reported in two categories. The first category of reserves is usable reserves, which represent real cash available to the Council to provide services. The Council must maintain a prudent level of these reserves for unexpected events. The second category of reserves does not represent real cash. It includes reserves that hold unrealised gains or losses (for example the Revaluation Reserve) where amounts would only become available to provide services if the assets are sold; and reserves that hold timing differences shown in the Movement in Reserves Statement line "Adjustments between accounting basis and funding basis under regulations".

	31 March 2021	31 March 2022	Notes
	£000	£000	
Property, Plant and Equipment	937,595	970,348	9
Heritage Assets	37,698	37,648	12
Investment Property	46,102	51,959	13
Intangible Assets	246	221	14
Long term Investment	1	1	15
Long Term Debtors	2,425	6,992	16
Long Term Assets	1,024,067	1,067,169	
Short Term Investments	80,004	88,614	17
Assets Held for Sale	225	269	18
Inventories	5,754	5,159	17
Short Term Debtors	127,661	118,920	17
Cash and Cash Equivalents	82,571	119,113	17
Current Assets	296,215	332,075	
Cash and Cash Equivalents (Overdraft)	(3,413)	(5,949)	17
Short Term Borrowing	(8,964)	(56,560)	17
Short Term Creditors	(185,871)	(192,981)	17
Provisions	(5,188)	(10,192)	19
Current Liabilities	(203,436)	(265,682)	
Provisions	(10,600)	(3,535)	19
Long term borrowing	(330,531)	(319,494)	43b
Pension Liabilities	(1,234,891)	(870,558)	35
PFI & Other Long-Term liabilities	(150,535)	(141,739)	35
Capital Grants Receipts in Advance	(15,571)	(13,904)	41
Long Term Liabilities	(1,742,128)	(1,349,230)	
Net Liabilities	(625,282)	(215,668)	
Usable Reserves	(337,717)	(335,265)	5
Unusable Reserves	962,999	550,933	20
Total Reserves	625,282	215,668	

City of Bradford Metropolitan District Council

## **Cash Flow Statement**

The Cash Flow Statement shows the changes in cash and cash equivalents of the Council during the reporting year. The statement shows how the Council generates and uses cash and cash equivalents by classifying cash flows as operating, investing and financing activities. The amount of net cash flows arising from operating activities is a key indicator of the extent to which the operations of the Council are funded by way of taxation and grant income or from the recipients of services provided by the Council i.e. fees and charges. Investing activities represent the extent to which cash outflows have been made for resources which are intended to contribute to the Council's future service delivery. Cash flows arising from financing activities are useful in predicting claims on future cash flows by providers of capital (i.e., borrowing) to the Council.

	2020-21	2021-22
	£000	£000
Net surplus or (deficit) on the provision of services (Comprehensive Income and Expenditure Statement) (page 20)	(39,294)	(62,497)
Adjustments to net surplus or deficit on the provision of services for non-cash movements (Note 21 d)	184,902	139,715
Adjustments for items included in the net surplus or deficit on the provision of services that are investing and financing activities (Note 21 d)	(50,888)	(88,729)
Net cash flows from Operating Activities	94,720	(11,511)
Investing Activities (Note 21 b)	(53,838)	3,517
Financing Activities (Note 21 c)	(52,392)	42,000
Net increase or (decrease) in cash and cash equivalents	(11,510)	34,006
Balance Sheet Movement		
Cash and cash equivalents at the beginning of the reporting period (Balance Sheet: Current Assets Cash and Cash equivalents less Current Liabilities Cash and Cash Equivalents)	90,668	79,158
Cash and cash equivalents at the end of the reporting period (Note 17) (Balance Sheet: Current Assets Cash and Cash equivalents less Current Liabilities Cash and Cash Equivalents)	79,158	113,164
Net increase or (decrease) in cash and cash equivalents	(11,510)	34,006

## Note 1. Statement of Significant Accounting Policies

The Statement of Accounts summarises the Council's transactions for the 2021-22 financial year and its position at the year-end of 31 March 2022.

The Council is required to prepare an annual Statement of Accounts by the Accounts and Audit Regulations 2015, which those Regulations require to be prepared in accordance with proper accounting practices. These practices primarily comprise the Code of Practice on Local Authority Accounting in the United Kingdom 2021-22 supported by International Financial Reporting Standards (IFRS) and statutory guidance issued by government.

## i. Accruals of Income and Expenditure

Activity is accounted for in the year that it takes place, not simply when cash payments are made or received. In particular:

- Revenue from contracts with service recipients, whether for services or the provision of goods, is recognised when the goods
  or services are transferred to the service recipient in accordance with the performance obligations in the contract.
- Supplies are recorded as expenditure when they are consumed. Where there is a gap between the date supplies are received and their consumption, they are carried as inventories on the Balance Sheet.
- Expenses in relation to services received (including services provided by employees) are recorded as expenditure when the services are received rather than when payments are made.
- Interest receivable on investments and payable on borrowings is accounted for respectively as income and expenditure on
  the basis of the effective interest rate for the relevant financial instrument rather than the cash flows fixed or determined by
  the contract.
- Where revenue and expenditure have been recognised but cash has not been received or paid, a debtor or creditor for the
  relevant amount is recorded in the balance sheet. Where debts may not be settled, the balance of debtors is written down
  and a charge made to revenue for the income that might not be collected.

There are a small number of exceptions to the accruals concept:

- A 12-month charge is included for payments to public utilities but this may not necessarily be the period of the financial year.
- Expenditure on rent allowances is accounted for on a 52-week basis, with an occasional 53rd week being charged into the
  accounts.
- A deminimis of £1,000, services may in exception still do these such as schools, has been set for the 2021-22 year. The Council only manually accrues for debtors and creditors greater than £1,000.

## ii. Cash and Cash equivalents

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours. Cash equivalents are investments that mature in no more than three months from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value.

In the Cash Flow Statement, cash and cash equivalents are shown net of bank overdrafts, but in the balance sheet these are shown gross.

## iii. Exceptional Items

When exceptional items of income and expenditure are material, their nature and amount is disclosed separately, either on the face of the Comprehensive Income and Expenditure Statement or in the Notes to the Accounts, depending on how significant the items are to an understanding of the Council's financial performance.

### iv. Prior Period Adjustments, Changes in Accounting Policies and Estimates and Errors

Prior period adjustments may arise as a result of a change in accounting policies or to correct a material error. Changes in accounting estimates are accounted for prospectively, i.e. in the current and future years affected by the change and do not give rise to a prior period adjustment.

Changes in accounting policies are only made when required by proper accounting practices or the change provides more reliable or relevant information about the effect of transactions, other events and conditions on the Council's financial position or financial performance. Where a change is made, it is applied retrospectively (unless stated otherwise) by adjusting opening balances and comparative amounts for the prior period as if the new policy had always been applied.

Material errors discovered in prior period figures are corrected retrospectively by amending opening balances and comparative amounts for the prior period.

### v. Charges to Revenue for Non - Current Assets

Services, support services and trading accounts are debited with the following amounts to record the cost of holding non-current assets during the year:

- Depreciation attributable to the assets used by the relevant service.
- Revaluation and impairment losses on assets used by the service where there are no accumulated gains in the Revaluation Reserve against which the losses can be written off.
- Amortisation of intangible non-current assets attributable to the service.

The Council is not required to raise Council Tax to fund depreciation, revaluation and impairment losses or amortisation. However, it is required to make an annual contribution from revenue towards the reduction in its overall borrowing requirement, in accordance with the Prudential Code. This requires that the Council sets the annual contribution at a prudent level, so that the contribution pays broadly for the benefit in each year of the capital expenditure in proportion to the overall borrowing required. Depreciation, revaluation and impairment losses and amortisation are therefore replaced by the MRP (Minimum Revenue Provision) contribution in the General Fund Balance, by way of an adjusting transaction with the Capital Adjustment Account in the Movement in Reserves Statement for the difference between the two.

## vi. Employee Benefits

## **Benefits Payable During Employment**

Short-term employee benefits are those due to be settled within 12 months of the year-end. They include such benefits as wages and salaries, paid annual leave and paid sick leave, bonuses and non-monetary benefits (for example, leased cars) for current employees and are recognised as an expense for services in the year in which employees render service to the Council. An accrual is made using appropriate sampling techniques for the estimated cost of holiday entitlements (or any form of leave) earned by employees but not taken before the year-end which employees can carry forward into the next financial year. The accrual is charged to the Surplus or Deficit on the Provision of Services, but then reversed out through the Movement in Reserves Statement so that holiday benefits are charged out to revenue in the financial year in which the holiday absence occurs.

## **Termination Benefits**

Termination benefits are amounts payable as a result of a decision by the Council to terminate an employee's employment (before the normal retirement date) or an employee's decision to accept voluntary redundancy. They are charged on an accruals basis to individual Services in the Comprehensive Income and Expenditure Statement when the Council is demonstrably committed to the termination of the employment of an employee or is making an offer to encourage voluntary redundancy.

Where termination benefits involve the enhancement of pensions, statutory provisions require the General Fund balance to be charged with the actual amount payable by the Council to the pension fund or pensioner in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, appropriations are required to and from the Pensions Reserve to remove the notional debits and credits for pension enhancement termination benefits and replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year end.

### **Post-Employment Benefits**

Employees of the Council are members of three separate pension schemes:

- The Local Government Pensions Scheme, administered by City of Bradford MDC on behalf of the West Yorkshire Pension Fund.
- The Teachers' Pension Scheme, administered by Capita Teachers' Pensions on behalf of the Department for Education (DfE).
- The NHS Pensions Scheme, administered by NHS Pensions.

All schemes provide defined benefits to Members (retirement lump sums and pensions), earned as employees work for the Council. However, the arrangements for the teachers' and NHS schemes mean that liabilities for these benefits cannot ordinarily be identified specifically to the Council. These schemes are therefore accounted for as if it were a defined contribution scheme and no liability for future payments of benefits is recognised in the Balance Sheet. The Children's Services line in the Comprehensive Income and Expenditure Statement is charged with the employer's contributions payable to Teachers' Pensions in the year. The Health & Wellbeing line in the Comprehensive Income and Expenditure Statement is charged with the employer's contributions payable to the NHS Pension Scheme in the year.

#### The Local Government Pension Scheme

The Local Government Scheme is accounted for as a defined benefits scheme:

- The liabilities of the West Yorkshire Pension Fund attributable to the Council are included in the Balance Sheet on an actuarial basis using the projected unit method i.e. an assessment of the future payments that will be made in relation to retirement benefits earned to date by employees, based on assumptions about mortality rates, employee turnover rates, and any other relevant factors, and projections of projected earnings for current employees.
- Liabilities are discounted to their value at current prices, using a discount rate based on the indicative rate of return on high quality corporate bond. The discount rate adopted by the Actuary is based on a weighted average of "spot yield" on AA rated corporate bonds.
- The assets of the West Yorkshire Pension Fund attributable to the Council are included in the Balance Sheet (netted from the overall pension liability) at their fair value:
  - quoted securities current bid price
  - unquoted securities professional estimate
  - unitised securities current bid price
  - property market value

The change in the net pensions liability is analysed into six components:

- Current service cost the increase in liabilities as a result of years of service earned this year allocated in the Comprehensive Income and Expenditure Statement to the services for which the employees worked.
- Past service cost the increase in liabilities arising from current year decisions whose effect relates to years of service earned in earlier years – debited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement.
- Net interest expense on the defined benefit obligation the expected increase in the present value of liabilities during the year as they move one year closer to being paid debited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement. This is netted off the annual investment return on the fund assets attributable to the Council, based on an average of the expected long-term return credited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement.
- Gains or losses on settlements and curtailments the result of actions to relieve the Council of liabilities or events that reduce the expected future service or accrual of benefits of employees debited or credited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement.
- Re-measurement of the net defined benefit obligation changes in the net pension liability that arise because events have not coincided with assumptions made at the last actuarial valuation or because the actuaries have updated their assumptions.
- Contributions paid to the West Yorkshire Pension Fund cash paid as employer's contributions to the pension fund in settlement of liabilities; not accounted for as an expense.

Additional pension costs such as early retirement costs, for which the WYPF recharge the Council direct, have been included in the liabilities and contributions in line with International Accounting Standard (IAS) 19.

All defined benefits awarded to employees are recognised in the pension liability, and an actuarial calculation of the liabilities in respect of the compensatory added year's benefits awarded to teachers has been obtained and included within the overall pension liability.

The difference between the value of the pension fund assets calculated by the actuary and the present value of scheme liabilities is shown in Note 20d relating to the Pension Reserve.

In relation to retirement benefits, statutory provisions require the General Fund balance to be charged with the amount payable by the Council to the pension fund or directly to pensioners in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, this means that there are appropriations to and from the Pensions Reserve to remove the notional debits and credits for retirement benefits and replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year end. The negative balance that arises on the

Pensions Reserve thereby measures the beneficial impact to the General Fund of being required to account for retirement benefits on the basis of cash flows rather than as benefits are earned by employees.

Local Government Pension Scheme members retiring on or after 6 April 2006 can elect to take a higher lump sum in exchange for a lower retirement benefit. The commutation terms mean that it is less costly for the scheme to provide the lump sum than the pension, as more members take up this option, employers' pension costs are reduced. At its inception it was assumed that 50% of members will take up the option to increase their lump sum to the maximum available. However, the 2021-22 figures are based on the assumption that each member surrenders pension on retirement, such that the total cash received (including any accrued lump sum from pre-2008 service) is 75% of the permitted maximum.

### **Teachers' Pensions**

The Council is responsible for the costs of any additional benefits awarded upon early retirement outside of the terms of the teacher's scheme. These benefits are fully accrued in the pension liability.

### **Discretionary Benefits**

The Council also has restricted powers to make discretionary awards of retirement benefits in the event of early retirements. Any liabilities estimated to arise as a result of an award to any member of staff (including teachers) are accrued in the year of the decision to make the award and accounted for using the same policies as are applied to the Local Government Pension Scheme.

#### vii. Events After the Balance Sheet Date

Events after the Balance Sheet date are those events, both favourable and unfavorable, that occur between the end of the reporting period and the date when the Statement of Accounts is authorised for issue. Two types of events can be identified:

- Those that provide evidence of conditions that existed at the end of the reporting period the Statement of Accounts is adjusted to reflect such events.
- Those that are indicative of conditions that arose after the reporting period the Statement of Accounts is not adjusted to
  reflect such events, but where a category of events would have a material effect, disclosure is made in the notes of the
  nature of the events and their estimated financial effect.

Events taking place after the date of authorisation for issue are not reflected in the Statement of Accounts.

The 2021-22 accounts were authorised for issue on the 23<sup>rd</sup> March 2023, following approval from the Corporate Governance and Audit Committee on the 23<sup>rd</sup> March 2023. This authorisation was given by the Chair Governance and Audit Committee Cllr Angela Tait and the Director of Finance (S151 Officer) Christopher Kinsella (page 5).

### viii. Financial Instruments

A financial instrument is defined as any contract that gives rise to a financial asset of one entity and a financial liability of another. The term covers both financial liabilities and financial assets and, includes the borrowing, trade payables, lending, trade receivables, investments and bank deposits of the Council.

### **Financial Liabilities**

Financial liabilities are recognised on the Balance Sheet when the Council becomes a party to the contractual provisions of a financial instrument and are initially measured at fair value and are carried at their amortised cost. Annual charges to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement (CIES) for interest payable are based on the carrying amount of the liability, multiplied by the effective rate of interest for the instrument. The effective interest rate is the rate that exactly discounts estimated future cash payments over the life of the instrument to the amount at which it was originally recognised.

For most of the borrowings that the Council has, this means that the amount presented in the Balance Sheet is the outstanding principal repayable (plus accrued interest); and interest charged to the CIES is the amount payable for the year according to the loan agreement.

Where premiums and discounts have been charged to the Comprehensive Income and Expenditure Statement, regulations allow the impact on the General Fund balance to be spread over future years. The Council has a policy to spread the gain or loss over the term of the loan against which the premium was payable or discount receivable when it was repaid. The reconciliation of amounts charged to the Comprehensive Income and Expenditure Statement to the net charge required against the General Fund is managed by a transfer to or from the Financial Instruments Adjustment Account in the Movement in Reserves Statement.

## **Financial Assets**

Financial assets are classified based on a classification and measurement approach that reflects the business model for holding the financial assets and their cash flow characteristics. There are three main classes of financial assets measured at:

- Amortised cost. Such assets are those where there are contractual terms giving rise on specified dates to cash flows which
  are solely payments of principal and interest on the principal outstanding, and where the business model is to collect the
  cash flows arising.
- Fair value through profit or loss (FVPL).
- Fair value through other comprehensive income (FVOCI).

The Council's business model is to hold investments to collect contractual cash flows. Financial assets are therefore classified as amortised cost, except for those whose contractual payments are not solely payment of principal and interest (i.e. where the cash flows do not take the form of a basic debt instrument).

#### **Financial Assets Measured at Amortised Cost**

Financial assets measured at amortised costs are recognised on the Balance Sheet when the Council becomes a party to the contractual provisions of a financial instrument and are initially measured at fair value. They are subsequently measured at their amortised cost. Annual credits to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement for interest receivable are based on the carrying amount of the asset multiplied by the effective rate of interest for the instrument. For most of the financial assets held by the Council, this means that the amount presented in the Balance Sheet is the outstanding principal receivable (plus accrued interest) and interest credited to the CIES is the amount receivable for the year in the loan agreement.

Any gains and losses that arise on the derecognition of an asset are credited or debited to Financing and Investment Income and Expenditure in the Comprehensive Income and Expenditure Statement.

#### **Expected Credit Loss Model**

The Council recognises expected credit losses on all of its financial assets held at amortised cost, either on a 12-month or lifetime basis. The expected credit loss model also applies to lease receivables and contract assets. Only lifetime losses are recognised for trade receivables (debtors) held by the Council.

Impairment losses are calculated to reflect the expectation that the future cash flows might not take place because the borrower could default on their obligations. Credit risk plays a crucial part in assessing losses. Where risk has increased significantly since an instrument was initially recognised, losses are assessed on a lifetime basis. Where risk has not increased significantly or remains low, losses are assessed on the basis of 12-month expected losses.

### Financial Assets Measured at Fair Value through Profit of Loss

Financial assets that are measured at FVPL are recognised on the Balance Sheet when the Council becomes a party to the contractual provisions of a financial instrument and are initially measured and carried at fair value. Fair value gains and losses are recognised as they arrive in the Surplus or Deficit on the Provision of Services.

Assets are maintained in the Balance Sheet at fair value. Fair value of an asset is the price that would be received to sell an asset in an orderly transaction between market participants at the measurement date. Values are based on the following principles:

- Instruments with quoted market prices the market price
- Other instruments with fixed and determinable payments discounted cash flow analysis

The inputs to the measurement techniques are categorised in accordance with the following three levels:

- Level 1 inputs quoted prices (unadjusted) in active markets for identical assets that the authority can access at the
  measurement date.
- Level 2 inputs inputs other than quoted prices included within Level 1 that are observable for the asset, either directly or indirectly.
- Level 3 inputs unobservable inputs for the asset.

Any gains and losses that arise on the derecognition of the asset are credited or debited to Financing and Investment Income and Expenditure in the Comprehensive Income and Expenditure Statement.

Where fair value cannot be measured reliably, the instrument is carried at cost (less any impairment losses).

## Financial assets measured at fair value through other comprehensive income

Financial assets that are measured at FVOCI are recognised on the balance sheet when the Council becomes a party to the contractual provisions of a financial instrument and are initially measured and carried at fair value. Fair value gains and losses are recognised as they arise in other comprehensive income.

## ix. Government Grants and Contributions

Whether paid on account, by instalments or in arrears, government grants and third party contributions and donations are recognised as due to the Council when there is reasonable assurance that:

- The Council will comply with the conditions attached to the payments.
- The grants or contributions will be received.

Amounts recognised as due to the Council are not credited to the Comprehensive Income and Expenditure Statement until conditions attached to the grant or contribution have been satisfied. Conditions are stipulations that specify that the future economic benefits or service potential embodied in the asset acquired using the grant or contribution are required to be consumed by the recipient as specified, or future economic benefits or service potential must be returned to the transferor.

Monies advanced as grants and contributions for which conditions have not been satisfied are carried in the Balance Sheet as creditors. When conditions are satisfied, the grant or contribution is credited to the relevant service (attributable revenue grants and contributions) or Taxation and Non-Specific Grant Income (non-ringfenced revenue grants and all capital grants) in the Comprehensive Income and Expenditure Statement.

Where capital grants are credited to the Comprehensive Income and Expenditure Statement, they are reversed out of the General Fund Balance in the Movement in Reserves Statement. Where the grant has yet to be used to finance capital expenditure, it is posted to the Capital Grants Unapplied Reserve. Where it has been applied, it is posted to the Capital Adjustment Account. Amounts in the Capital Grants Unapplied Reserve are transferred to the Capital Adjustment Account once they have been applied to fund capital expenditure.

### x. Heritage Assets

The Council's Heritage Assets are assets that are held by the Council principally for their contribution to knowledge and/or culture. They are recognised and measured including treatment of revaluation gains and losses in accordance with the Council's accounting policies on Property, Plant and Equipment. However, some of the measurement rules are relaxed in relation to heritage assets as detailed below.

These are assets which are intended to be preserved in trust for future generations because of their cultural, environmental or historical associations. Where it is practicable to obtain a valuation, heritage assets are held at current value. Valuation methods used by the authority include professional valuations and insurance valuations. The Council has recognised the major pieces of its museum collection on the Balance Sheet on the basis of the lower valuation completed by an external valuer. Civic regalia has been included using as its base the detailed insurance valuations (which are based on market values provided by an external valuer in 2010) held by the Council in respect of the collection.

Where a current valuation is not practicable at a reasonable cost, heritage assets are held at historic cost, if this is known. If neither current valuation nor historic cost is available, then heritage assets are not recognised on the balance sheet. The Council discloses information about the nature and scale of its collections of heritage assets, whether or not these have been identified on the balance sheet.

In 2013-14, the accounting policy for one category of Heritage Assets changed, so that items in Museum collections are only included in the balance sheet, where an independent valuation is available.

The Council is unlikely to be able to recognise the majority of the ceramics, porcelain work, figurines, pottery, machinery, ephemera, photography, biological and geological records and specimens, books and manuscripts in future financial statements. This is due to the fact that obtaining valuations for the vast majority of these collections would involve a disproportionate cost of obtaining the information in comparison to the benefits to the users of the Council's financial statements.

The Council discloses information about the nature and scale of its collections of heritage assets, whether or not these have been identified on the balance sheet.

Heritage assets are assumed to be held in perpetuity, and are therefore not depreciated. However, heritage assets are reviewed for impairment in the same way as any other tangible or intangible assets.

The Council has had a number of items kindly donated over the years, but it has insufficient information as to what the value would have been when they were donated. The Council has therefore not recognised any of these assets in the Donated Assets Account on the Balance Sheet prior to 1 April 2010, although their current value might be included as Long Term Assets on the Balance Sheet.

Some assets are also classified as operational heritage assets where they are in addition to being held in trust for future generations, also used by the Council for other activities and services. In such cases, the assets are classified, valued and depreciated in accordance with their general type, for instance buildings.

## xi. Intangible Assets

Expenditure on non-monetary assets that do not have physical substance but are controlled by the Council as a result of past events (e.g. software licences), is capitalised, when it is expected that future economic benefits or service potential will flow from the intangible asset to the Council.

Internally generated assets are capitalised where it is demonstrable that the project is technically feasible and is intended to be completed (with adequate resources being available) and the Council will be able to generate future economic benefits or deliver service potential by being able to sell or use the asset. Expenditure is capitalised where it can be measured reliably as attributable to the asset and is restricted to that incurred during the development phase (research expenditure cannot be capitalised).

Expenditure on the development of Council websites is not capitalised if the website is solely or primarily intended to promote or advertise the Council's goods or services.

Intangible assets are measured initially at cost. Amounts are only revalued where the fair value of the assets held by the Council can be determined by reference to an active market. In practice, no intangible asset held by the Council meets this criterion, and they are therefore carried at amortised cost. The depreciable amount of an intangible asset is amortised over its useful life to the relevant service in the Comprehensive Income and Expenditure Statement. An asset is tested for impairment whenever there is an indication that the asset might be impaired – any losses recognised are posted to the relevant services in the Comprehensive Income and Expenditure Statement. Any gain or loss arising on the disposal or abandonment of an intangible asset is posted to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement.

Where expenditure on intangible assets qualifies as capital expenditure for statutory purposes, amortisation, impairment losses and disposal gains and losses are not permitted to have an impact on the General Fund Balance. The gains and losses are therefore reversed out of the General Fund Balance in the Movement in Reserves Statement and posted to the Capital Adjustment Account and (for any sale proceeds greater than £10,000) the Capital Receipts Reserve.

#### xii. Interests in Companies and Other Entities

The Council does not have any material interests in companies and other entities that have the nature of subsidiaries, associates and joint arrangements which would require it to prepare group accounts.

The Council has financial relationships with a number of subsidiary and associated companies, in the main to manage the Building Schools for the Future (BSF) programme. None of them are material in size or nature. They are shown in the notes to the main financial statements and have been treated according to IAS 27 and IAS 28 (Associates).

### xiii. Inventories and Long-term Contracts

Inventories are included in the Balance Sheet at the lower of cost and net realisable value.

Long term contracts are accounted for on the basis of charging the Surplus or Deficit on the Provision of Services with the value of works and services received under the contract during the financial year.

### xiv. Investment Property

Investment properties are those that are used solely to earn rentals and/or capital appreciation. The definition is not met if the property is used in any way to facilitate the delivery of services or production of goods or is held for sale.

Investment properties are measured initially at cost and subsequently at fair value, based on the highest and best use value of the asset. Investment properties are not depreciated but valuations are assessed annually to ensure they reflect market conditions at year end. Gains and losses on revaluation are posted to Financing and Investment Income and Expenditure in the Comprehensive Income and Expenditure Statement. The same treatment is applied to gains and losses on disposals.

Rentals received in relation to investment properties are credited to Financing and Investment Income and result in a gain for the General Fund Balance. However, revaluation and disposal gains and losses are not permitted by statutory arrangements to have an impact on the General Fund Balance. The gains and losses are therefore reversed out of the General Fund Balance in the Movement in Reserves Statement and posted to the Capital Adjustment Account and (for any sale proceeds greater than £10,000) the Capital Receipts Reserve.

### xv. Joint Arrangements

Joint arrangements are activities undertaken by the Council in conjunction with other venturers that involve the use of the assets and resources of the venturers rather than the establishment of a separate entity. The Council recognises on its Balance Sheet the assets that it controls and the liabilities that it incurs and debits and credits the Comprehensive Income and Expenditure Statement with the expenditure it incurs and the share of income it earns from the activity of the operation.

Joint arrangements may also mean items of property, plant or equipment that are jointly controlled by the Council and other venturers, with the assets being used to obtain benefits for the venturers. The joint arrangement does not involve the establishment of a separate entity. The Council accounts for only its share of the joint arrangements, the liabilities and expenses that it incurs on its own behalf or jointly with others in respect of its interest in the joint arrangement and income that it earns from the arrangement.

### xvi. Leases

Leases are classified as finance leases where the terms of the lease transfer substantially all the risks and rewards incidental to ownership of the property, plant or equipment from the lessor to the lessee. All other leases are classified as operating leases.

Where a lease covers both land and buildings, the land and buildings elements are considered separately for classification.

Arrangements that do not have the legal status of a lease but convey a right to use assets in return for payment are accounted for under this policy where fulfilment of the arrangement is dependent on the use of specific assets.

### The Council as Lessee

### Finance Leases

Property, plant and equipment held under finance leases is recognised on the Balance Sheet at the commencement of the lease at its fair value measured at the inception of the lease (or the present value of the minimum lease payments, if lower). The asset recognised is matched by a liability for the obligation to pay the lessor. Initial direct costs of the Council are added to the carrying amount of the asset. Premiums paid on entry into a lease are applied to writing down the lease liability. Contingent rents are charged as expenses in the periods in which they are incurred.

Lease payments are apportioned between:

 a charge for the acquisition of the interest in the property – applied to write down the lease liability (together with any premiums received).  finance charge (debited to Financing and Investment Income and Expenditure in the Comprehensive Income and Expenditure Statement).

Property, Plant and Equipment recognised under finance leases are accounted for using the policies applied generally to such assets, subject to depreciation being charged over the lease term if this is shorter than the asset's estimated useful life (where ownership of the asset does not transfer to the Council at the end of the lease period).

### Operating leases

Where the Council does not have the risks and rewards of ownership, the rental income is shown in the Income and Expenditure account as an expense of the Services benefiting from the use of the leased property, plant and equipment.

### The Council as Lessor

#### Finance Leases

Where the Council grants a lease on one of its assets, a finance lease exists where the economic reality is a sale. This is usually when the minimum lease payments approximate to the value of the asset. The accounting treatment is that the related asset is removed from the balance sheet as a disposal and the lease payments separated into deferred capital receipts and interest income.

Any gain credited to the Comprehensive Income and Expenditure Statement on disposal is not permitted by statute to increase the General Fund Balance and is required to be treated as a capital receipt. Where a premium has been received, this is posted out of the General Fund Balance to the Capital Receipts Reserve in the Movement in Reserves Statement. Where the amount due in relation to the lease asset is to be settled by the payment of rentals in future financial years, this is posted out of the General Fund Balance to the Deferred Capital Receipts Reserve in the Movement in Reserves Statement. When the future lease rentals are received, the element for the capital receipt for the disposal of the asset is used to write down the lease debtor. At this point, the deferred capital receipts are transferred to the Capital Receipts Reserve.

The written off value of disposals is not a charge against Council Tax, as the cost of non-current assets is fully provided for under separate arrangements for capital financing. Amounts are therefore appropriated to the Capital Adjustment Account from the General Fund Balance in the Movement in Reserves Statement.

#### **Operating Leases**

Where the Council grants an operating lease over a property or an item of plant or equipment, the asset is retained in the Balance Sheet. Rental income is credited to Other Operating Expenditure in the Comprehensive Income and Expenditure Statement. Credits are made on a straight line basis over the life of the lease, even if this does not match the pattern of payments (for example, there is a premium paid at the commencement of the lease). Initial direct costs incurred in negotiating and arranging the lease are added to the carrying amount of the relevant asset and charged as an expense over the lease term on the same basis as rental income.

## xvii. Property, Plant and Equipment

Assets that have physical substance and are held for use in the production of goods or services, for rental to others, or for administrative purposes and that are expected to be used during more than one financial year are classified as Property, Plant and Equipment.

Highways infrastructure assets include carriageways, footways and cycle tracks, structures (e.g. bridges, underpasses), street lighting, street furniture, traffic management systems and land which together form a single integrated network.

## Recognition

Expenditure on the acquisition, creation or enhancement of Property, Plant and Equipment above the de minimis level of £10,000 is capitalised on an accruals basis, provided that it is probable that the future economic benefits or service potential associated with the item will flow to the Council and the costs of the item can be measured reliably. Expenditure that maintains, but does not add to an asset's potential to deliver future economic benefits or service potential (i.e. repairs and maintenance), is charged as an expense when it is incurred.

### Measurement

Assets are initially measured at cost, comprising:

- The purchase price.
- Any costs attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

The Council does not capitalise borrowing costs incurred whilst assets are under construction.

The cost of assets acquired other than by purchase is deemed to be its fair value, unless the acquisition does not have commercial substance (i.e. it will not lead to a variation in the cash flows of the Council). In the latter case, where an asset is acquired via an exchange, the cost of the acquisition is the carrying amount of the asset given up by the Council.

Assets are then carried in the Balance Sheet using the following measurement bases:

 Infrastructure – Highways infrastructure assets are generally measured at depreciated historical cost, however this is a modified form of historical cost. Opening balances for highways infrastructure assets were originally recorded in balance sheets at amounts of capital undischarged for sums borrowed as at 1 April (1994 England and Scotland), which was deemed at that time to be historical cost.

- Assets Under Construction historical cost.
- Dwellings current value, determined using the basis of Existing Use Value for Social Housing (EUV-SH).
- Community assets the Council values community assets at current value; historical cost has been used when this is an appropriate stand-in for current value.
- Surplus assets fair value, estimated at highest and best use, determined from the perspective of market participants.
- All other assets current value, determined as the amount that would be paid for the asset in its existing use (existing
  use value EUV).

Where there is no market based evidence of current value because of the specialist nature of an asset, Depreciated Replacement Cost (DRC) is used as an estimate of current value.

Where non-property assets (Vehicles, Plant, Furniture and Equipment) have short useful lives or low values (or both), depreciated historical cost basis is used as a proxy for current value.

Assets included in the Balance Sheet at current value are revalued sufficiently regularly to ensure that their carrying amount is not materially different from their current value at year end, but as a minimum every five years. Increases in valuations are matched by credits to the Revaluation Reserve to recognise unrealised gains. Exceptionally, gains might be credited to the Comprehensive Income and Expenditure Statement where they arise from the reversal of a loss previously charged to a service.

Where decreases in value are identified, they are accounted for by:

- Where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- Where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

The Revaluation Reserve contains revaluation gains recognised since 1 April 2007 only, the date of its formal implementation. Gains arising before that date have been consolidated into the Capital Adjustment Account.

## **Component Accounting**

The Council's accounting policy from 1 April 2010 onwards is to apply component accounting to all assets being revalued, enhanced or acquired, with a net book value excluding land of £1m or more. Separate components will only be identified where their value is a minimum of 20% of the cost of the asset, and have a different life to other components of the asset. The main component classes to be separately valued will be the structure, plant and equipment, and 'other' to include unusual or one-off components. Where an existing asset is revalued into separate components, the actual or estimated value of the separate components will have to be derecognised. If the original cost is not known, the Council's Asset Management service will use an appropriate index to calculate the net current value of the relevant component.

The Council is also following the Code of Practice's requirements for componentisation where assets are acquired or enhanced, with the Council's £1m minimum value excluding land, for componentisation, as set out below:

- When new assets are acquired, separate components with value over 20%, are recognised on initial recognition. This is best assessed when the asset is first acquired.
- Where an asset is enhanced, separate components (over 20% of total value) have been recognised. These components will not just relate to the enhancement work, but to existing components as well.

## Impairment

Assets are assessed at each year end as to whether there is any indication that an asset may be impaired. Where indications exist and any possible differences are estimated to be material, the recoverable amount of the asset is estimated and, where this is less than the carrying amount of the asset, an impairment loss is recognised for the shortfall.

Where impairment losses are identified, the accounting treatment is:

- Where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- Where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service in the Comprehensive Income and Expenditure Statement.

Where an impaired loss is reversed subsequently, the reversal is credited to the relevant service in the Comprehensive Income and Expenditure Statement, up to the amount of the original loss, adjusted for depreciation that would have been charged if the loss had not been recognised.

## Depreciation

Depreciation is provided for all Property, Plant and Equipment assets by the systemic allocation of their depreciable amounts. An exception is made for assets without a determinable finite useful life (i.e. freehold land and certain Community Assets) and assets that are not yet available for use (i.e. assets under construction).

Depreciation is calculated on the following basis:

- Dwellings and other buildings straight-line allocation over the useful life of the property as estimated by the valuer.
- Vehicles, plant, furniture and equipment –depreciated over 3 to 25 years as appropriate.
- Infrastructure straight-line over 30 to 42 years as appropriate.
- Surplus Assets straight-line allocation over the useful life of the property as estimated by the valuer.
- PFI straight-line allocation over the useful life of the property as estimated by the valuer.

Where an item of Property, Plant and Equipment assets has major components whose cost is significant in relation to the total cost of the item, the components are depreciated separately.

Revaluation gains are also depreciated, with an amount equal to the difference between current value depreciation charged on assets and the depreciation that would have been chargeable based on their historical cost being transferred each year from the Revaluation Reserve to the Capital Adjustment Account.

Assets are not depreciated in their year of acquisition. Revalued assets do not have their useful economic life (UEL) or depreciation charges amended until the year following the revaluation.

#### Disposals and Non-Current Assets Held for Sale

When it becomes probable that the carrying amount of an asset will be recovered principally through a sale transaction rather than through its continuing use, it is reclassified as an Asset held for Sale. The asset is revalued immediately before reclassification and then carried at the lower of this amount and fair value less costs to sell. Where there is a subsequent decrease to fair value less costs to sell, the loss is posted to the Other Operating Expenditure in the Comprehensive Income and Expenditure Statement. Gains in fair value are recognised only up to the amount of any previous losses recognised in the Surplus or Deficit on Provision of Services. Depreciation is not charged on Assets Held for Sale.

If assets no longer meet the criteria to be classified as Assets Held for Sale, they are reclassified back to non-current assets and valued at the lower of their carrying amount before they were classified as held for sale (adjusted for depreciation, amortisation or revaluations that would have been recognised had they not been classified as Held for Sale), and their recoverable amount at the date of the decision not to sell.

Assets that are to be abandoned or scrapped are not reclassified as Assets Held for Sale.

When an asset is disposed of or decommissioned, the carrying amount of the asset in the Balance Sheet (whether Property, Plant and Equipment or Assets Held for sale) is written off to the Other Operating Expenditure in the Comprehensive Income and Expenditure Statement as part of the gain or loss on disposal. Receipts from disposals (if any) are credited to the same place in the Comprehensive Income and Expenditure Statement and accounted for as part of the gain or loss on disposal (i.e. netted off against the carrying value of the asset at the time of disposal). Any revaluation gains accumulated for the asset in the Revaluation Reserve are transferred to the Capital Adjustment Account.

Amounts received for a disposal in excess of £10,000 are categorised as capital receipts. A proportion of receipts relating to housing disposals (75% for dwellings, 50% for land and other assets, net of statutory deductions and allowances) is payable to the Government. The balance of receipts is required to be credited to the Capital Receipts Reserve, and can then only be used for new capital investment (or set aside to reduce the Council's underlying need to borrow), in the Capital Financing Requirement Statement. Receipts are appropriated to the Reserve from the General Fund Balance in the Movement in Reserves Statement.

The written-off value of disposals is not a charge against the General Fund, as the cost of non-current assets is fully provided for under separate arrangements for capital financing. Amounts are appropriated to the Capital Adjustment Account from the General Fund Balance in the Movement in Reserves Statement.

## xviii. Private Finance Initiative (PFI) and Similar Contracts

PFI and similar contracts are agreements to receive services, where the responsibility for making available the property, plant and equipment needed to provide the services passes to the PFI contractor. As the Council is deemed to control the services that are provided under its PFI schemes, and as ownership of the property, plant and equipment will pass to the Council at the end of the contracts for no additional charge, the Council carries the assets used under the contracts on its Balance Sheet as part of Property, Plant and Equipment. The unitary payments made for the PFI schemes are split, using estimation techniques, into separate elements. Those elements impacting on the balance sheet are the repayment of the liability and capital lifecycle replacement costs. Other elements are the interest payable on the outstanding liability, the value of services received and contingent rent (contract inflationary increases) which impact on the Comprehensive Income and Expenditure statement.

## xix. Provisions, Contingent Liabilities and Contingent Assets

### **Provisions**

Provisions are made where an event has taken place that gives the Council a legal or constructive obligation that probably requires settlement by a transfer of economic benefits or service potential, and a reliable estimate can be made of the amount of the obligation. For instance, the Council could be involved in a court case that could eventually result in the making of a settlement or the payment of compensation.

Provisions are charged as an expense to the appropriate services in the Comprehensive Income and Expenditure Statement in the year that the Council becomes aware of the obligation, and are measured at the best estimate at the Balance Sheet date of the expenditure required to settle the obligation, taking into account relevant risks and uncertainties.

When payments are eventually made, they are charged to the provision carried in the Balance Sheet. Estimated settlements are reviewed at the end of each financial year - where it becomes less than probable that a transfer of economic benefits will now be required (or a lower settlement than anticipated is made), the provision is reversed and credited back to the relevant service.

Where some or all of the payment required to settle a provision is expected to be recovered from another party (e.g. from an insurance claim), this is only recognised as income for the relevant service if it is virtually certain that reimbursement will be received if the Council settles the obligation.

The carrying value of debtors has been impaired to reflect bad and doubtful debts. The impairment is netted off the gross total of debtors in line with accounting practice and is not included in the provisions note. Known uncollectable debts have been written off in full.

### **Contingent Liabilities**

A contingent liability arises where an event has taken place that gives the Council a possible obligation whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the Council. Contingent liabilities also arise in circumstances where a provision would otherwise be made but either it is not probable that an outflow of resources will be required or the amount of the obligation cannot be measured reliably.

Contingent liabilities are not recognised in the Balance Sheet but disclosed in a note to the accounts.

#### **Contingent Assets**

A contingent asset arises where an event has taken place that gives the Council a possible asset whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the Council. Contingent assets are not recognised in the Balance Sheet but disclosed in a note to the accounts where it is probable that there will be an inflow of economic benefits or service potential.

#### xx. Reserves

The Council sets aside specific amounts as reserves for future policy purposes or to cover contingencies. Reserves are created by appropriating amounts out of the General Fund Balance in the Movement in Reserves Statement. When expenditure to be financed from a reserve is incurred, it is charged to the appropriate service in that year to score against the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement. The reserve is then appropriated back into the General Fund Balance in the Movement in Reserves Statement so that there is no net charge against Council Tax for the expenditure. These reserves are classed as usable reserves and itemised in Note 5.

Certain reserves are kept to manage the accounting processes for non-current assets, financial instruments, retirement and employee benefits. These reserves are classed as unusable reserves and explained in Note 20.

### xxi Revenue Expenditure Funded from Capital under Statute (REFCUS)

Expenditure incurred during the year that may be capitalised under statutory provisions but that does not result in the creation of a non-current asset has been charged as expenditure to the relevant service in the Comprehensive Income and Expenditure Statement in the year. This includes grants and other assistance given to outside bodies and individuals for capital purposes. Where the Council has determined to meet the cost of this expenditure from existing capital resources or by borrowing, a transfer in the Movement in Reserves Statement from the General Fund Balance to the Capital Adjustment Account then reverses out the amounts charged so that there is no impact on the level of Council Tax.

## xxii. Value Added Tax (VAT)

VAT payable is included as an expense only to the extent that it is not recoverable from Her Majesty's Revenue and Customs. VAT receivable is excluded from income within the Council's income and expenditure account.

## xxiii. Partnership Arrangements

Where the Council acts as the accountable body for specific grants or other schemes, they are accounted for on the following basis:

- If the Council controls the grant distribution process, all of the grant money received and the associated expenditure will be included in the Council's accounts. Conversely if the Council does not control the award of grant, only the grant allocated to the Council itself and the associated expenditure is recognised in the Council's accounts.
- Where the Council is the ultimate recipient of grant distributed by the decision making body, the grant receivable is included in the accounts on an accruals basis.
- Where liabilities may arise for the repayment of grant as a result of the Council's status as an accountable body these
  will be recognised in the accounts of the Council in accordance with accounting policies.

## xxiv. Council Tax and National Non Domestic Rates (NNDR)

In the Council's capacity as billing authority it acts as an agent in collecting and distributing Council Tax income on behalf of the major preceptors and itself. The Code requires that only the Council's share of income and expenditure and Balance Sheet items are included in the financial statements.

The Council acts as an agent in collecting National Non Domestic Rates (NNDR) on behalf of the government, but also retains a 49 % share of NNDR received. The budgeted, rather than actual, total of the 49% share of NNDR attributable to the Council is recognised in the Comprehensive Income and Expenditure Statement. The difference between the budgeted 49% share and the actual amount received is transferred to the Collection Fund Adjustment Account and credited or debited to the Comprehensive Income and Expenditure Statement in future years.

## xxv. Acquired and Discontinued Operations

Where the Council, has acquired material operations, or discontinued operations, further details will be provided. In general, the acquired or discontinued operations will also be shown separately in the Comprehensive Income and Expenditure Account.

## xxvi. Fair value measurement

The Council measures some of its non-financial assets such as surplus assets and investment properties at fair value at each reporting date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement assumes that the transaction to sell the asset or transfer the liability takes place either:

- · In the principal market for the asset or liability, or
- in the absence of a principal market, in the most advantageous market for the asset or liability.

The Council measures the fair value of an asset or liability using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest. When measuring the fair value of a non-financial asset, the Council takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Council uses appropriate valuation techniques for each circumstance and for which sufficient data is available, maximising the use of relevant observable inputs and minimising the use of unobservable inputs. Inputs to the valuation techniques in respect of assets and liabilities for which fair value is measured or disclosed in the Council's financial statements are categorised within the fair value hierarchy, as follows:

- Level 1 quoted price (unadjusted) in active markets for identical assets or liabilities that the Council can access at the measurement date.
- Level 2 inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly or indirectly.
- Level 3 unobservable inputs for the asset or liability.

### Note 2. Prior Period Adjustments

There were no prior period adjustments in 2021-22

# Note 3. Accounting Standards not yet adopted, Changes to the Code, Critical Judgements and Assumptions and Estimation

#### Accounting Standards Issued, not yet adopted

The Code requires the disclosure of information relating to the impact of an accounting change that will be required by a new accounting standard, but one which has not yet been implemented.

The Code also requires that changes in accounting policy are to be applied retrospectively unless transitional arrangements are specified, this would, therefore result in an impact on disclosures spanning two financial years.

Accounting changes that will be introduced by the 2022-23 Code are:

- Annual Improvements to IFRS Standards 2018–2020. The annual IFRS improvement programme notes 4 changed standards:
  - IFRS 1 (First-time adoption) amendment relates to foreign operations of acquired subsidiaries transitioning to IFRS
  - IAS 37 (Onerous contracts) clarifies the intention of the standard
  - IFRS 16 (Leases) amendment removes a misleading example that is not referenced in the Code material
  - IAS 41 (Agriculture) one of a small number of IFRSs that are only expected to apply to local authorities in limited circumstances.

These changes are not expected to have a material impact on the Council's Statement of Accounts.

## **Critical Judgements in applying Accounting Policies**

The Council has made judgements about different transactions and the uncertainty of future events. The critical judgements made in the Statement of Accounts are:

The Council has judged whether its leases are operating or finance leases. These judgements are based on a number of tests, which determine, regardless of the legal form, whether the economic reality of the lease arrangement is that the Council has purchased the asset on credit. The most common test to determine whether this is the economic reality is that the lease arrangement lasts for most of the life of the asset. The accounting treatment of operating and finance leases is different and impact on the main accounting statements.

The Council has also judged whether its contractual arrangements contain an implicit finance lease, which is to say the economic reality is that the Council is paying for the use of an asset as well as a service. The contractual arrangements are tested in a similar way to the Council's lease arrangements. Where this is the case, the Council has shown the asset on its balance sheet per the economic reality, which is that the asset has been purchased.

In addition, the Council has made judgements about which assets to classify as heritage assets, by judging whether those assets that are non-operational have artistic, scientific, cultural and environmental qualities. The accounting standards allow wide discretion over how to value heritage assets. The Council has made the judgement to value heritage assets using professional external valuations and insurance values on specific assets, where possible.

There is also a requirement for the Council to exercise judgement about which school types should be included in the Balance Sheet, given there are different degrees of autonomy with the school types. By virtue of legal ownership or the control exerted over school governing bodies, the Council recognises on its balance sheet at current value, interests in all schools where ownership is vested either in the Council or a school governing body. This includes all community schools, and some foundation and voluntary controlled schools (62 in total). All other schools (18) are vested in founding trusts controlled by religious or charitable bodies. Ownership of these schools is not recognised by the Council as there is no past transaction or event giving the Council control of these properties; rights to continuing use of the assets, or to the benefits associated with them. This is entirely dependent on the ongoing and future goodwill of the owner which could take back the asset at any time. However, the costs of providing actual education services from such establishments and the revenues arising are recognised as service costs under net cost of services.

Overall the Council's policy is not to include Academies on its Balance Sheet. As such, schools transferring to Academies will also be de-recognised from the balance sheet and newly built Academies will not be shown as assets on the Council's balance sheet when long term leases have been completed.

The Council has made judgements about how the Building Schools for the Future (BSF) Phase 2 schools were initially recognised on the Council Balance Sheet. Three mainstream Secondary Schools were handed over to the Council along with three colocated Special Education Secondary Schools on the sites. The Private Finance Initiative (PFI) contract does not separate out the construction costs for the Secondary Schools and the Special Schools and a judgement was made to recognise the schools initially on a 50:50 split based on the construction costs included in the PFI contract. This approach was taken as the PFI assets were to be revalued once they had been handed over to the Council.

The Council has made a judgement on the amount that needs to be set aside to repay past debt. This amount is known as the Minimum Revenue Provision (MRP) and is charged to the Movement in Reserves Statement. Depreciation is calculated on accounting principles, and is charged to the Comprehensive Income and Expenditure Statement but reversed and replaced by MRP charged to the Movement in Reserves Statement. MRP is calculated on regulatory principles according to the Council's judgement of what is prudent.

## Assumptions made about the Future and Other Major Sources of Estimation Uncertainty

Item	Uncertainties	Effect if Actual Results Differ from Assumptions
Property, Plant and Equipment	The Council has Property, Plant and Equipment of £970.348m as at 31 March 2022. Assets are depreciated over useful lives that are dependent on assumptions about the level of repairs and maintenance that will be incurred in relation to individual assets. The current economic climate makes it uncertain whether the Council will be able to maintain an adequate level of spend on repairs and maintenance, which could affect the useful lives of certain assets.	If the useful life of assets is for example reduced, depreciation increases and the carrying amount of the asset falls.
Pensions Liability	The Council had a pension liability of £870.558m at 31 March 2022. Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. A firm of consulting actuaries, Aon Hewitt Limited, is engaged to provide the Council with expert advice about the assumptions to be applied.	The effects on the net pension liability of changes in individual assumptions can be measured. A 0.1% increase in the discount rate assumption would result in a decrease in the present value of the total defined benefit obligation for Local Government Pension Scheme (LGPS) funded benefits of £63.7m – a decrease from £3,348.9m to £3,285.2m.

## Note 4. Adjustments between accounting basis and funding basis under Regulations 2021-22

This note shows the removal of expenditure and income included in the accounts in accordance with accounting policies but not chargeable against Council Tax by statute. For example, depreciation is charged in accordance with accounting policy but is not chargeable against Council Tax by statute. The note also shows the charging of other items against Council Tax according to statute but which are excluded by accounting policies, for instance the minimum revenue provision.

2020-21				2021-22				
Use	eable Reser	ves		Useable Reserves	Use	eable Reserve	S	
General Fund Balance	Capital Receipts & Deferred Capital Receipts Reserve	Capital Grants Unapplied	Movement in Unusable Reserves	Adjustment between Accounting Basis and Funding Basis Under Regulation	General Fund Balance	Capital Receipts & Deferred Capital Receipts Reserve	Capital Grants Unapplied	Movement in Unusable Reserves
£000	£000	£000	£000		£000	£000	£000	£000
				Adjustments primarily involving the Capital Adjustment Account:				
				Reversal of items debited or credited to the Comprehensive Income and Expenditure Statement:				
33,681	-	-		Charges for depreciation and impairment of non current assets	34,804	-	-	(34,804)
6,878 7,943	-	-		Revaluation losses on property, plant and equipment  Movements in the market value of Investment Properties	5,378 (5,714)	-	-	(5,378) 5,714
143	-	-		Amortisation of intangible assets	117	-	-	(117)
(28,445)	-	-		Capital grants and contributions applied	(29,180)	-	-	29,180
7,666	-	(5,453)	(2,213)	Revenue expenditure funded from capital under statute (REFCUS)  Amounts of non-current assets written off on disposal or sale as part	6,737	-	(3,775)	(2,962)
16,502	-	-	(16,502)	of the gain/loss on disposal to the Comprehensive Income and	18,590	-	-	(18,590)
				Expenditure Statement				
-	-	-	-	Donated Assets Insertion of items not debited or credited to the Comprehensive	-	-	-	-
				Income and Expenditure Statement:				
(24,435)	-	-		Statutory provision for the financing of capital investment	(24,647)	-	-	24,647
(4,897)	-	-	4,897	Capital expenditure charged against the General Fund  Adjustments primarily involving the Capital Grants Unapplied	(2,942)	-	-	2,942
				Account:				
(10,748)	-	10,74	-	Capital grants and contributions unapplied credited to the	(35,179)	-	35,179	-
	_	8	625	Comprehensive Income and Expenditure Statement Application of grants to capital financing transferred to the Capital	_		(9,402)	9,402
		(625)	020	Adjustment Account			(0,402)	2,12
				Adjustments primarily involving the Capital Receipts Reserve				
(4,785)	5,077	-	(292)	Transfer of cash sale proceeds credited as part of the gain/loss on disposal to the Comprehensive Income and Expenditure Statement	(3,869)	4,322	-	(453)
				Use of the Capital Receipts Reserve to finance new capital				
-	(2,979)	-	2,979	expenditure	-	(4,163)	-	4,163
-	(2,097)	-		Used for debt repayment	-	-	-	-
-	(1)	-	1	Contribution from the Capital Receipts Reserve to finance the payments to the Government capital receipts pool.	-	-	-	-
				Adjustments primarily involving the Deferred Capital Receipts				
				Reserve:				
-	-	-	-	Transfer of deferred sale proceeds credited as part of the gain/loss on disposal to the Comprehensive Income and Expenditure Statement	(10)	-	-	10
				Adjustments primarily involving the Financial Instruments				
				Adjustment Account:  Amount by which finance costs charged to the Comprehensive				
(276)	-	-	276	Income and Expenditure Statement are different from finance costs	(276)	-	-	276
				chargeable in the year in accordance with statutory requirements				
				Adjustments primarily involving the Pensions Reserve:				
109,607	-	-	(109,607)	Reversal of items relating to retirement benefits debited or credited to the Comprehensive Income and Expenditure Statement	138,684	-	-	(138,684)
(48,123)	-	-	48,123	Employer's pensions contributions and direct payments to pensioners payable in the year:	(49,957)	-	-	49,957
				Adjustments primarily involving the Collection Fund Adjustment				
				Account:  Amount by which council tax and business rates income credited to				
36,103			(36.103)	the Comprehensive Income and Expenditure Statement is different	(15,081)			15,081
30,103		-	(36,103)	from council tax and business rates income calculated for the year in accordance with statutory requirements	(15,081)	-	-	15,081
				Adjustment primarily involving the Accumulated Absences				
				Account:				
				Amount by which officer remuneration charged to the Comprehensive Income and Expenditure Statement on an accruals basis is different	429			(400)
2,943	-	-	(2,943)	from remuneration chargeable in the year in accordance with	429	-	-	(429)
				statutory requirements.  Total Adjustments between accounting basis & funding basis				
99,757	-	4,670	(104,427)	under regulations	37,884	159	22,002	(60,045)

Note 5. Transfers to/from Earmarked Reserves

	Delever of			D-1			Delever of
	Balance at 31 March 2020	Transfers Out	Transfers In	Balance at 31 March 2021	Transfers Out	Transfers In	Balance at 31 March 2022
	£0003	£000	£000	£000	£000	£000	£000
General Fund							
General Fund Reserve	15,000	_	_	15,000	-	4,500	19,500
Schools Delegated Balances	31,922	(1,145)	11,153	41,930	_	3,625	45,555
Held by Council – Schools	31,922	(212)		933	(88)	3,023	45,555 845
LA Admission Appeals Reserve	_	(212)	- 1,140	-	(27)	200	173
A. Total General Fund Balance	46,922	(1,357)	12,298	57,863	(115)	8,325	66,073
Earmarked Reserves							
Reserves available to support future budget decisions	10,300	-	400	10,700		-	10,700
Earmarked Reserves	40.040	(0.400)	4.040	45.000	(0.000)	400	0.405
Transitional and Risk	12,943	(2,128)	4,218	15,033	(6,998)	100	8,135
Exempt VAT	2,000	-	1,000	3,000	-	-	3.000
Producer City Initiative	157	-	-	157	-	-	157
PFI - Contracts	490	-	-	490	-	-	490
Employment Opportunities Fund	328	-	1,587	1,915	(1,169)	-	746
Insurance	1,775	(1,775)	-	-		-	-
Insurance Risk	1,893	-	-	1,893	(1,889)	-	4
Regional Growth Fund	3,741	(106)	-	3,635	(24)	-	3,611
Better Use of Budgets	-	-	5,166	5,166	(5,166)	-	-
Regional Revolving Investment Fund	625	-	-	625	-	-	625
Discretionary Social Fund	1,495	(98)	-	1,397	(171)	-	1,226
Match Fund Basic Needs Grant	700	-	-	700	(700)	-	-
Dilapidation & Demolition	946	(179)	1,000	1,767	(390)	_	1,377
Strategic Site Assembly & Develop	609	(300)	_	309	-	_	309
Redundancy Reserve	4,696	, ,	_	4,696	(948)	_	3,748
Implementation Reserve	1,108	(259)	655	1,504	(0.0)	_	1,504
NDR Volatility Reserve	2,735	(1,000)	-	1,735	(1,735)	1,378	1,378
Council Tax Reserve	575	(1,000)	_	575	(575)	1,070	1,070
Leeds City Region WYTF	421	_	· ·	421	(373)		421
, ,		-	_		-	_	
Leeds City Region Economic Development	402	-	-	402	-	-	402
Finance Works Reserve	94	(005)	-	94	(004)	60	154
Markets Compensation	648	(325)	400	723	(321)	400	802
Financing Reserve 2019/20	1,000	-	-	1,000	-	-	1,000
ICT Programmes Budget	3,133	(1,709)	-	1,424	(1,890)	941	475
Children Services Investment Fund	1,039	(694)	400	745	(745)	-	-
S31 Business Rate Grants & TIG Reserve	16,854	(16,854)	34,995	34,995	(19,374)	3,559	19,180
Covid 19 funding allocation Reserve	13,011	(21,089)	30,227	22,149	(22,666)	517	-
Project Feasibility Reserve	-	-	2,000	2,000	(256)	-	1,744
Indexation Pressures Reserves	-	(1,295)	1,431	136	-	-	136
CT Hardship Reserves	-	-	99	99	(99)	-	-
Financing Reserve	52,573	-	-	52,573	-	-	52,573
	125,991	(47,811)	83,178	161,358	(65,116)	6,955	103,197
Reserves for capital investment							
Markets	102	(309)	300	93	(352)	300	41
Renewal and Replacement	5,137	. ,	_	5,137	(22)	_	5,115
	5,239	(309)	300	5,230	(374)	300	5,156
Service Earmarked Reserves							
PFI - BSF Unitary Charge	15,156	-	966	16,122	-	270	16,392
Supporting People	64	-	-	64	(64)	-	-
Integrated Health and Social Care	2,048	(100)	6,283	8,231	(1,241)	8,747	15,737
Community Support and Innovation Fund	302	(23)	-	279	-	-	279
Other	15,772	(4,170)	3,266	14,868	(2,291)	24,242	36,819
	33,342	(4,293)	10,515	39,564	(3,596)	33,259	69,227
Revenue Grant Reserves	17,160	(4,112)	11,151	24,199	(9,650)	5,902	20,451
HRA Reserve		-	503	503	(503)	-	-
B Total Earmarked Reserves	402.022	(56,525)	106 047	2/1 EE 4	(70.220)	AG 440	200 724
D Total Editidiked Reserves	192,032	(56,5∠5)	106,047	241,554	(79,239)	46,416	208,731
C Capital Grants Unapplied	33,630	(6,078)	10,748	38,300	(13,177)	35,179	60,302
D Capital Receipts Reserve		(5,077)	5,077	-	(4,163)	4,322	159
E Total Other Usable Reserves	33,630	(11,155)	15,825	38,300	(17,340)	39,501	60,461
Total Usable Reserves	272,584	(69,037)	134,170	337,717	(96,694)	94,242	335,265
	212,304	(55,557)	134,170	551,111	(50,054)	J-1,2-12	000,200

Earmarked Reserves are amounts set aside to meet the cost of future commitments, political priorities and specific financial risks. Capital Grants and Capital Receipts unapplied also represent real cash balances but these can only be used to fund capital expenditure.

#### a) General Fund Balance (£66.1m)

A net £66.073m balance has been carried forward to 2022-23 (£57.863m at 31 March 2021). This includes £46.573m carried forward for schools under delegated budgets.

All authorities are expected to maintain a prudent balance for unforeseen events and to assist cash flow management at a prudent level. The Council has assessed this level to be £19.500m in 2021-22, an increase of £4.500m from 2020-21.

## b) Earmarked Reserves (£208.7m)

In light of the ongoing reductions in Government funding since 2010, the Council has consistently applied its Reserves Policy to either fund one off priority investment or transitional activity whilst seeking to reduce its recurrent cost base.

In 2021-22 the overall level of earmarked reserves decreased by a net £32.8m from £241.6m at 31 March 2021 to £208.7m at 31 March 2022.

#### c) Capital Grants Unapplied Reserve (£60.3m)

The Capital Grants Unapplied Reserve represents usable capital grants available to fund capital expenditure. Capital Grants are included in this reserve, rather than shown as Capital Grants Receipted in Advance when all the grant conditions have been met. Capital grants and contributions unapplied are credited to the Comprehensive Income and Expenditure Statement when grant conditions are met.

### d) Capital Receipts Reserve (£0.2m)

When capital receipts are used either to repay debt or to fund capital investment, they are transferred from the Capital Receipts Unapplied Reserve to the Capital Adjustment Account.

Authorities are required to pay 75% of their housing capital receipts into a national pool. The Council was required to pay nil to the pool in 2021-22 (£1k in 2020-21). The Council is required to make a corresponding transfer to the Capital Receipts Reserve to offset the contribution to the pool. This transfer is shown in the Statement of Movement on the General Fund Balance. The usable balance of housing receipts and all other capital receipts are held in the Capital Receipts Reserve until applied either to finance capital expenditure or to repay debt.

2020-21	Capital Receipts Reserve	2021-22
£000		£000
-	Balance at 1 April	-
	Usable receipts in the year	
4,785	Disposal of assets	3,869
292	Other capital receipts	453
(1)	Appropriation to (–) from Revenue Account re pooled housing receipts	-
(2,979)	Used to finance capital spending	(4,163)
(2,097)	Used for debt repayment	-
-	Balance at 31 March	159

Whilst most capital receipts arise from the disposal of assets, other capital receipts may arise, mainly where the Council has given a loan or other assistance for capital purposes.

## Note 6. Exceptional Items

There were no exceptional items in 2021-22 or 2020-21.

## Note 7. Post Balance Sheet Events

Since 1 April nine schools have transferred to Academy status. The school assets have an estimated value of £54.9m at 31 March 2022 and due to the completion of a 125 year lease they will be removed from the Balance Sheet in 2022-23.

## Note 8. Analysis of the Comprehensive Income and Expenditure

The following tables provide a further analysis of the individual lines that appear on the face of the Comprehensive Income and Expenditure Statement:

a) Other Operating expenditure

2020-21	Other Operating expenditure	2021-22
£000		£000£
2,544	Parish Council Precepts	2,644
1	Payments to the Government Housing Capital Receipts Pool	-
11,764	Losses on the disposal of non-current assets	14,737
14,309	Total	17,381

b) Financing and Investment Income and Expenditure

2020-21	Financing and Investment Income and Expenditure	2021-22
£000		£000
33,629	Interest payable and similar charges (see table 8c below)	32,878
23,513	Net Interest on the Pension net defined benefit liability/(asset)	25,412
(260)	Interest receivable and other income	(337)
6,202	Income and expenditure in relation to investment properties and changes in their fair value	(7,265)
(751)	Other investment income	(264)
4,844	Net Deficit/surplus on Trading Accounts	4,495
67,177	Total	54,919

c) External interest costs are paid by the Council on loans raised to finance capital expenditure

2020-21	Interest Payable and Similar Charges	2021-22
£000		£000
	External interest charges	
14,737	Public Works Loans Board	14,569
17,118	Interest on PFI and finance lease rentals	16,551
1,549	Lender Option Borrower Option (LOBO's)	1,542
210	Transferred debt	194
15	Interest on short term borrowing	22
33,629	Total	32,878

d)Taxation and Non-Specific Grant Income

2020-21	Taxation and Non-Specific Grant Income	2021-22
£000		£000
(203,629)	Council Tax income	(216,449)
(36,255)	Non domestic rates	(52,511)
(201,231)	Non-ring fenced government grants (see below)	(163,975)
(39,194)	Capital grants and contributions	(64,357)
=	Donated Assets Funding	-
(480,309)	Total	(497,292)

Revenue grants that do not relate to the delivery of a specific service are grouped together and shown as income in the Comprehensive Income and Expenditure Statement. In 2021-22 the Council received the following:

e) Government Grants

) Government Grant		
2020-21	Government grants (not attributable to specific services)	2021-22
£000		£000
(34,609)	Revenue Support Grant	(34,800)
(69,269)	Top Up Grant	(69,259)
(852)	Local Services Support Grant	(1,658)
(4,118)	New Homes Bonus Grant	(2,046)
(27,853)	Section 31 Grant, mainly relating to Business Rates and National Levy surplus	(28,716)
(38,563)	Covid 19 Support Grant	(18,524)
(12,973)	Income Compensation Scheme	(2,848)
(5,852)	Council Tax Hardship Grant	(6,124)
(7,142)	75% Tax Income Guarantee Compensation	-
(201,231)	Total	(163,975)

Note 9. Property, Plant and Equipment: Movements on Balances in 2021-22

	Council Dwellings	Other Land and Buildings	Vehicles, Plant, Furniture & Equipment	Community Assets	Surplus Assets	Assets Under Construction	Total Property, Plant & Equipment	PFI Assets Included in Property, Plant & Equipment
	£000	£000	£000	£000	£000	£000	£000	£000
Cost or Valuation								
At 1 April 2021	32,747	608,852	55,288	54,280	13,266	21,153	785,586	48,544
Additions	119	13,102	8,094	22	790	20,718	42,845	716
Revaluation in the Rev. Reserve	(307)	10,254	-	(9)	1,119	-	11,057	5,303
Revaluation in Surplus/Deficit on the Provision	(11,757)	(26,659)	-	(146)	(1,696)	-	(40,258)	3,196
of Services								
Derecognition – disposals	-	(16,906)	(1,857)	-	(39)	-	(18,802)	-
Derecognition – other	-	-	-	-	-	-	_	-
Assets reclassified (to)/from Held for Sale	-	(704)	-	-	(1,283)	-	(1,987)	-
Reclassifications	5,252	11,717	-	-	4,604	(21,826)	(253)	-
Other movements in cost or valuation	-	-	-	-	-	-	-	-
At 31 March 2022	26,054	599,656	61,525	54,147	16,761	20,045	778,188	57,759
At 1 April 2021	(605)	(52,874)	(32,017)	(1)	(405)	-	(85,902)	(2,850)
Depreciation charge	(543)	(15,301)	(5,521)	-	(75)	-	(21,440)	(1,040)
Depreciation w/o Revaluation Reserve	10	7,967	-	-	67	-	8,044	152
Depreciation w/o to the Surplus/Deficit on the Provision of Services	1,137	33,228	-	-	516	-	34,881	3,738
Impairment losses/(reversals) in the Revaluation Reserve	-	-	-	-	-	-		-
Impairment in Surplus/Deficit on the Provision of Services	-	-	-	-	-	-	-	-
Derecognition – disposals	_	532	1,810	_	_	_	2,342	_
Derecognition – other	_	-	,510	_	_	_	,,,,,,	_
Reclassifications – other	_	874	_	_	(702)	_	172	_
Other movements in depreciation & impairment	-	-	-	-	_ ` -	-	-	-
At 31 March 2022	(1)	(25,574)	(35,728)	(1)	(599)	-	(61,903)	0
At 31 March 2021 – Net Book Value	32,142	555,978	23,271	54,279	12,861	21,153	699,684	45,694
								57,759
At 31 March 2022 – Net Book Value	26.053	574.082	25.797	54,146	16.162	20,045	716,285	

### Comparative Movements in 2020-21

	Council Dwellings	Other Land and Buildings	Vehicles, Plant, Furniture & Equipment	Community Assets	Surplus Assets	Assets Under Construction	Total Property, Plant & Equipment	PFI Assets Included in Property, Plant & Equipment
	£000	£000	£000	£000	£000	£000	£000	£000
Cost or Valuation								
At 1 April 2020	36,274	611,701	50,085	54,278	13,034	13,223	778,595	48,325
Additions	189	13,332	8,422	78	885	7,930	30,836	219
Revaluation in the Rev. Reserve	-	6,510	-	(75)	(1,208)	-	5,227	-
Revaluation in Surplus/Deficit on the Provision	(3,716)	(6,588)	-	(6)	(299)	-	(10,609)	-
of Services				, ,				
Derecognition – disposals	-	(14,188)	(3,219)	-	(237)	-	(17,644)	-
Derecognition – other	-	-	-	_	-	-	_	-
Assets reclassified (to)/from Held for Sale	-	(53)	-		(774)	-	(827)	-
Reclassifications	-	(1,862)	-	5	1,865	-	. 8	-
Other movements in cost or valuation	-	-	-	_	_	-	_	-
At 31 March 2021	32,747	608,852	55,288	54,280	13,266	21,153	785,586	48,544
At 1 April 2020	-	(44,875)	(29,585)	-	(394)	-	(222,844)	(1,823)
Depreciation charge	(605)	(14,820)	(5,564)	-	(65)	-	(21,054)	(1,027)
Depreciation w/o Revaluation Reserve	-	1,185	-	-	249	-	1,434	-
Depreciation w/o to the Surplus/Deficit on the Provision of Services	-	3,654	-	-	77	-	3,731	-
Impairment losses/(reversals) in the	-	-	-	-	-	-	-	-
Revaluation Reserve Impairment in Surplus/Deficit on the Provision of Services	-	-	-	-	-	-	-	-
Derecognition – disposals	_	1,701	3.132	_		_		_
Derecognition – other	]	- 1,701	5,752	_	_		4,833	
Reclassifications – other	_	281		(1)	(272)		ρ.	
Other movements in depreciation & impairment	_	-	-	- (.,	(2.2)	-	-	-
At 31 March 2021	(605)	(52,874)	(32,017)	(1)	(405)	-	(233,892)	(2,850)
At 31 March 2020 – Net Book Value	36,274	566,826	20,500	54,278	12,640	13,223	703,741	46,502
At 31 March 2021 – Net Book Value	32,142	555,978	23,271	54,279	12,861	21,153	699,684	45,694
THE STEED OF VALUE	02,142	555,576	20,271	04,210	12,001	21,103	000,004	40,004

## Movements on balances

In accordance with the temporary relief offered by the Update to the Code on infrastructure assets this note does not include disclosure of gross cost and accumulated depreciation for infrastructure assets because historical reporting practices and resultant information deficits mean that this would not faithfully represent the asset position to the users of the financial statements.

The Council has chosen not to disclose this information as the previously reported practices and resultant information deficits mean that gross cost and accumulated depreciation are not measured accurately and would not provide the basis for the users of the financial statements to take economic or other decisions relating to infrastructure assets.

## Note 9a. Infrastructure Assets

	31 March 2021 £000	31 March 2022 £000
Net Book Value (modified historical cost) at 1st April	232,086	237,911
Additions	18,452	29,516
Derecognition	-	-
Depreciation	(12,627)	(13,242)
Impairment	-	(122)
Other Movements in cost	-	-
Net Book Value (modified historical cost) at 31st March	237,911	254,063

## Note 9b. Net Book Value Property, Plant and Equipment (including infrastructure)

The Council has determined in accordance with Regulation [30M England] of the Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2022 that the carrying amounts to be derecognised for infrastructure assets when there is replacement expenditure is nil.

	31 March 2021 £000	31 March 2022 £000
Infrastructure Assets	237,911	254,063
Other PPE Assets	699,684	716,285
Total Property, Plant and Equipment Net Book Value	937,595	970,348

### Note 10. Valuations

Operational and non-operational assets have been valued by Belinda Gaynor MRICS and other similarly qualified officers of the Council's Estate Management Service, in accordance with the Statements of Asset Valuation Practice and Guidance Notes of the Royal Institution of Chartered Surveyors. Not all properties were inspected as this was not considered necessary for the purposes of the valuation. Revaluations are planned through a five year rolling programme and have been listed in the table over in the year they were revalued.

Valuations were completed during the period 1st April 2021 to 30th April 2022. Assets reviewed as part of the 5-year plan were valued as at the 1st April 2021, with the exception of assets that had significant spend in year which were valued with effect from 31st March 2022.

Valuations were undertaken on the basis of current value in existing use, depreciated replacement cost/ modern equivalent asset and current value market value. Other than standard assumptions associated with each basis of valuation no specific assumptions were made with any additional assumptions being made individually for each asset.

The Council constructed a number of dwellings for rent, which are managed by a housing association on its behalf. The Council has to date not established an HRA in reliance on a Direction from the Secretary of State. That position is now under review.

#### Revaluations

	Council Dwellings	Other Land and Buildings	Vehicles, Plant, Furniture and Equipment	Surplus Assets	Infrastructure Assets	Community Assets	Assets Under Construction	Total
	£000	£000	£000	£000	£000	£000	£000	£000
Carried at Historical Cost	-	284	25,797	295	254,063	20,440	20,045	320,924
Held at Valuation Value in:								
2017-18	-	23,750	-	2,139	-	25,394	-	51,283
2018-19	-	15,143	-	1,404	-	4,946	-	21,493
2019-20	-	22,707	-	3,767	-	994	-	27,468
2020-21	-	18,940	-	3,366	-	1,034	-	23,340
2021-22	26,053	493,258	-	5,191	-	1,338	-	525,840
Total	26,053	574,082	25,797	16,162	254,063	54,146	20,045	970,348

There are a small number of assets in the OLB and surplus asset categories held at historic cost. For these low value assets, the historic cost, i.e. purchase price, is considered to be a reasonable approximation of fair value and so they are not included in the 5 year revaluations programme.

## Fair value measurement of surplus assets

The Council has accounted for surplus assets in accordance with IFRS 13 and they have been valued at fair value.

There has been no change in the valuation technique used during the year for surplus assets. Surplus assets have been valued at the highest and best use. The fair value of surplus property has been measured using a market approach, which takes into account market conditions and quoted prices for similar assets in active markets. The valuers are of the opinion that all surplus assets are at Level 2 on the fair value hierarchy using significant observable inputs.

There have been no transfers between the different levels of hierarchy during the year.

## Note 11. Capital Commitments and Obligations Under Long Term Contracts

## a) Capital Commitments

The Council has an approved capital investment plan for the period 2021-22. At 31 March 2022 the Council has entered into a number of contracts for the construction or enhancement of Property, Plant and Equipment in 2020-21 and future years budgeted to cost £44.354m. Similar commitments at 31 March 2021 were £17.173m. The major commitments (over £0.250m) are:

Capital Commitments	2020-21	2021-22
	£000	£000
SEN Expansion	912	=
Silsden Primary School	3,624	2,352
Wyke Sports Hub	4,430	516
Lister Park Playable Spaces	600	-
Vehicle Replacement	-	5,535
Bereavement Project	1,653	9,144
Coroners Court	2,278	-
WYCA Taxi EV Charge Point Project	265	-
WY+TF - Bradford to Shipley Corridor	1,329	748
Transforming Cities Fund	-	8,836
IP4 UTMC Maint & Op	-	500
South East Bradford Link Road	-	972
Smart Street Lighting	1,682	1,315
Clean Air Zone	400	-
City Centre Market	-	14,436
Total	17,173	44,354

## b) Obligations Under Long-Term Contracts

There was no long term obligation at 31 March 2022.

### Note 12. Heritage Assets

## **Tangible Heritage Assets**

	Museum collection	Civic regalia	Statues & Monuments	Total Assets
	£000	£000	£000	£000
Cost or valuation				
1 April 2020	35,568	1,732	113	37,413
Additions				
Revaluation increases / (decreases) recognised in the revaluation reserve	285	-	_	285
31 March 2021	35,853	1,732	113	37,698
Cost or valuation				
1 April 2021	35,853	1,732	113	37,698
Additions	-	-	-	-
Revaluation increases / (decreases) recognised in the revaluation reserve	(50)	-	-	(50)
31 March 2022	35,803	1,732	113	37,648

The Council held £37.648m heritage assets on its Balance Sheet as at 31 March 2022.

Heritage assets are assets that are held by the Council principally for their contribution to knowledge or culture. The Council acquires heritage assets in accordance with established Council Policies, i.e. the Acquisitions & Disposals Policy, Bradford Museums & Galleries. The policy of the Council is to manage and preserve its heritage assets and has no plans to dispose of them. Heritage assets are largely held in museums, managed by the Council, where there is public access. Other heritage assets are held for annual usage, such as the Lord Mayor's chain or items on display at City Hall.

The Council considers that the heritage assets held by the Council will have indeterminate lives and a high residual value; hence the Council does not consider it appropriate to charge depreciation in the financial statements in relation to these heritage assets.

#### Museum Collection - items on the Balance Sheet

The collection includes a wide range of material that collectively contributes to national / district knowledge and culture through their archaeological, historic, artistic, scientific, technological, geophysical and environmental qualities. These items are held at four main museums and two external stores within the district. More information on the collections can be found on the Council's website at <a href="http://www.bradfordmuseums.org">http://www.bradfordmuseums.org</a>

The Council owns approximately 691,000 items within the museum collections. It is not considered practical to individually value this entire collection, and so only those items which are considered to have a significant value are individually valued and recorded in the balance sheet at their current valuation.

In 2012-13 there was a review of the major pieces of the Fine Art Collection held at Cartwright Hall by external valuers Christies. For those items reviewed by Christies they have been included on the Balance Sheet based on auction values (lower range). During 2021-22 there has been one new valuation by external valuers resulting in a revaluation increase of £25,000. In addition, two paintings already included on the Balance Sheet have a revaluation decrease of £75,000 following review by external valuers Christies. Valuations for significant items of furniture, not currently included in the balance sheet figure, are due to be completed in July 2022.

In addition to external valuations the collection is considered for insurance values and four items are included on the Balance Sheet at insurance values which is based on values estimated by museum staff. The insurance values are considered annually.

Those items that are on temporary loan to the museum service have not been included in the Council's Balance Sheet as they are not the Council's assets.

## Museum exhibits and works of art - overall collections

As explained in the note above, only those items which have a significant individual value are included in the balance sheet. Items within the collection are diverse, ranging from scientific specimens, to period fashion garments, to antique furniture. The Council has determined that it would not be practical within a justifiable level of cost to obtain individual valuations for its entire collection.

### Civic Regalia

The Council's external valuer for its Civic Regalia (Sydneys Ltd) carried out a full valuation of the collection as at June 2010. The valuations are based on commercial markets. The valuations are updated approximately every ten years and the next one is due to be completed in 2022. The Council's Civic Regalia is mainly held in City Hall.

#### Statues and external works of art

The Council includes £0.113m of Statues and Monuments on the Balance Sheet. This relates to a war memorial and a new sculpture completed in 2019-20. The value in the accounts is at historic cost.

For the majority of the statues, neither cost nor valuation information can be provided and therefore reported in the Balance Sheet. This relates to over 60 statues and memorials that are located across the district.

### Other Heritage Assets

There are also potential heritage assets not included on the balance sheet and these include:

- Scheduled ancient monuments and regionally important geological sites carved rocks and caves.
- Library archives maps, photographs, newspapers & electoral rolls.
- Fossil Tree stumps.
- Statues and memorials across the district.

The Council also has a number of scheduled ancient monuments located on assets that it owns. In addition, there are records within the Library archives that are being held for historical reference. These assets cannot be valued because of the diverse nature of the assets and therefore cost or valuation information is not available as conventional valuation approaches lack sufficient reliability. The Council is of the opinion that the costs of obtaining the valuations for these items would be disproportionate in terms of the benefit derived.

Also, some heritage assets have been classified as operational heritage assets when they are in use, for instance a building which is used for office accommodation or to house a museum collection. In these cases, the asset is classified according to its type, in this case as land and buildings within the Property Plant and Equipment balance.

No significant heritage assets were disposed of in 2021-22 or 2020-21.

## **Additions of Heritage Assets**

There have been no significant purchases of heritage assets in 2021-22 but there have been some additions to the museum collections in the last two years. Individually these have not been thought significant so there is no separate valuation included in the Balance Sheet for purchased items.

#### Note 13. Investment Property

The following items of income and expense have been accounted for in the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement. For example, the net gain of £1.535 (see below Analysis of Rental Income and Management Costs of Investments), add the increase of £5.714m on fair value (see below reconciliation of Movements on Investments), add the gain on disposal of £0.016m comprise the £7.265m charge for investment properties in Note 8(b), Financing and Investment Income and Expenditure, page 40.

2020-21		2021-22
£000		2000
(2,427)	Rental income from investment property	(2,044)
(96)	Other income (service and other charges)	(156)
(2,523)		(2,200)
	Direct operating expenses:	
161	Repairs & maintenance	260
679	Management expenses	405
	<u> </u>	
(1,683)	Net (gain)	(1,535)

The movement in the fair value of investment properties over the year is summarised as:

2020-21	Reconciliation of Movements on Investments	2021-22
£000		£000
54,580	Balance at 1 April	46,102
33	Additions	251
(561)	Disposals	(300)
(7,943)	Net gains/losses(-) from fair value adjustments	5,714
	Transfers	
(7)	To/from Property, Plant and Equipment	192
46,102	Balance at 31 March	51,959

Investment Property has been valued by Belinda Gaynor MRICS and other similarly qualified officers of the Council's Asset Management Service, in accordance with the Statements of Asset Valuation Practice and Guidance Notes of the Royal Institution of Chartered Surveyors. Properties are not depreciated; the fair value of the Council's investment property is considered annually at each reporting date. Properties valued at over £0.1m are subject to a review annually whilst those less than £0.1m are subject to a full revaluation every 5 years as part of the rolling programme, and a desktop review is undertaken on the interim years.

#### Fair value

All the Council's investment property portfolio has been assessed as Level 2 for valuation purposes (see Note 1 for explanation of fair value levels).

In accordance with IFRS 13, investment properties have been valued at highest and best value. Investment properties comprise industrial, retail, retail, residential and office units; development and grazing land. Investment assets have been valued on a desktop basis using the Investment Method of Valuation relying on data held on the council's property database and case files and the knowledge of Estate Management staff. The main considerations in valuing investment properties are rental yields and sale values; size, location, configuration and access; condition and covenants. All investment property valuations are based on such observable inputs.

There were no transfers between levels during the year.

There has been no change in the valuation techniques used during the year for investment properties.

#### Highest and best use of investment properties

In most cases the current use of assets has been considered to be the highest and best use of the properties. The exception to this is land suitable for development which is currently put to a lower value use. In such cases, the use for which the property could be developed has been regarded as the highest and best use of the asset.

#### Note 14. Intangible Assets

The Council accounts for its software as intangible assets, to the extent that the software is not an integral part of a particular Information Technology (IT) system and accounted for as part of the hardware item within Property, Plant and Equipment. The intangible assets include only purchased licences and do not include any internally generated software. The Council does not have any intangible assets apart from software.

All software is given a useful life, based on the assessments of the period that the software is expected to be of use to the Council. All of the Council's software has an estimated useful life of between five and ten years. The carrying amount of intangible assets is amortised on a straight line basis. The amortisation of £0.117m charged to revenue in 2021-22 (£0.143m in 2020-21) was charged to the IT cost centre and then absorbed as an overhead across all the service headings in the Net Expenditure of Services. It is not possible to quantify exactly how much of the amortisation is attributable to each service heading.

The movement on Intangible Asset balances during the year is as follows:

	2020-21	2021-22
	£000	£000
Balance at 1 April each year		
Gross carrying amounts	20,325	19,702
Accumulated amortisation	(19,946)	(19,456)
Net carrying amount at start of year	379	246
Additions:		
Purchases	10	92
Other disposals	-	-
Amortisation for the period	(143)	(117)
Net carrying amount at end of year	246	221
Comprising :		
Gross carrying amounts	19,702	13,611
Accumulated amortisation	(19,456)	(13,390)

The intangible assets figure largely comprise the software required to run the Council's computer system. The Council has not been able to revalue this software due to its specialist nature as it has been specifically configured for the Council and is not easily comparable with any other system. However, the life of the system used for amortisation is estimated to be conservative, and the actual life should exceed the estimated life for accounting purposes.

### Note 15. Long Term Investment

The Council's long term investment at 31 March 2022 is made up of £1,000 in Integrated Bradford LEP Ltd (31 March 2021 £1.000).

### Integrated Bradford LEP Ltd - Company no. 5797774

In December 2006, the Council took a £1,000, (10%) interest in the Local Education Partnership, Integrated Bradford LEP Limited. The company has been set up to deliver the capital investment programme in Bradford secondary schools funded through the government initiative Building Schools for the Future.

# Note 16. Long Term Debtors

These represent the value of long term advances granted by the Council. The balance owing on sale of assets on finance leases of £0.21m represents the principal element of the lease.

31 March 2021	Analysis of Long Term Debtors	31 March 2022
£000		£000
527	Collection Fund	=
446	Car loans	414
227	Building Schools for the Future Ltd	213
479	Loans to organisations	847
4	Housing Advances	4
210	Balance owing on sale of assets on finance lease(s)	210
532	Other	5,304
2,425	Total	6,992

# Note 17. Current Assets and Current Liabilities

31 March 2021 £000	Inventories	31 March 2022 £000
3,458	Personal Protective Equipment	2,284
2,296	Other	2,875
5,754	Total	5,159

# Short term Debtors and Payments in Advance

General payments in advance have been shown separately since they are of significant value.

31 March 2021	Analysis of Debtors and Payments in Advance	31 March 2022
£000		£000
	Amounts falling due within one year	
50,650	Central Government bodies	31,548
6,801	Other local authorities	9,448
11,851	NHS bodies	27,379
651	Public corporations and trading funds	3
80,159	Other entities and individuals	69,020
6,559	General payments in advance	9,071
156,671	Total	146,469
	Less Impairments	
19,805	Collection Fund	17,111
9,205	Other	10,438
127,661	Net Total	118,921

The net debtors have decreased from a total of £127.661m at 31 March 2021 to £118.921m at 31 March 2022, a decrease of £8.740m.

### **Short Term Investments**

The Council has short term investments of £88.614m; see Balance Sheet (£80.004m 2020-21). This is invested with banks and building societies.

# **Cash and Cash Equivalents**

At any point in time the cash flow of the Council can result in temporary cash balances which are put into short-term investments. At the 31 March 2022, nil balances were invested less than 90 days in short term deposits, banks and building societies (£14.0m at 31 March 2021)

31 March		31 March
2021		2022
£000		£000
590	Cash held by the Council	111
67,981	Bank accounts	119,002
14,000	Short term deposits with building societies and banks	-
82,571	Total Cash and Cash Equivalents	119,113
(3,413)	Cash and Cash Equivalents Overdrawn	(5,949)
79,158	Total net Cash and Cash Equivalents	113,164

The Council also has short term borrowings of £56.56m (£8.964m 2020-21).

Creditors and Receipts in Advance

31 March 2021	Analysis of Creditors and Receipts in Advance	31 March 2022
£000		£000
	Amounts falling due within one year	
(70,920)	Central Government bodies	(53,751)
(975)	Other local authorities	(325)
(1,537)	NHS bodies	(3,919)
(509)	Public corporations and trading funds	(162)
(71,916)	Other entities and individuals	(71,536)
(145,857)	Total	(129,693)
	Receipts in advance	
(35,594)	Sundry	(57,820)
(4,420)	Developer's contributions	(5,468)
(40,014)	Total	(63,288)
(185,871)	Total Creditors and Receipts in Advance	(192,981)

# Note 18. Assets held for sale

Current Assets Held For Sale	2020-21	2021-22
	£000	£000
Balance outstanding at start of year	2,536	225
Additions	=	-
Assets newly classified as held for sale:	819	1,876
- Property, Plant and Equipment		
Revaluation losses	-	-
Assets declassified:		
- Property, Plant and Equipment	-	-
Assets sold	(3,130)	(1,832)
Balance outstanding at year end	225	269

### Note 19. Provisions

The provisions totals of £13.727m at 31 March 2022 and £15.788m at 31 March 2021 are separated on the Balance Sheet into current and long term provisions. The current provisions are those expecting to be used in the next financial year, £10.192m at 31 March 2022 (£5.188m at 31 March 2021). Long term provisions are those expecting to be used more than 12 months after the Balance Sheet date, £3.535m at 31 March 2022 (£10.600m at 31 March 2020).

	Termination	Personal Search Fees	MMI Scheme of Arrangement	Outstanding Legal Cases	Injury and Damage Compensation Claims	Business Rate Appeals	Total
	£000	£000	£000	£000	£000	£000	£000
Balance at 31 March 2020	345	93	1,033	3,021	3,602	16,474	24,568
Additional provisions made in 2020-21	-	-	-	2,487	2,961	-	5,448
Amounts used in 2020-21	(289)	-	-	(1,212)	(929)	-	(2,430)
Unused amounts reversed in 2020-21	-	-	(147)	(676)	(2,613)	(8,362)	(11,798)
Balance at 31 March 2021	56	93	886	3,620	3,021	8,112	15,788
Additional provisions made in 2021-22	722	-	-	1,148	1,762	2,990	6,622
Amounts used in 2021-22	(628)	-	(325)	(714)	(1,166)	(3,525)	(6,358)
Unused amounts reversed in 2021-22	-	-	-	(916)	(1,409)	-	(2,325)
Balance at 31 March 2022	149	93	561	3,139	2,208	7,577	13,727
Short-Term	149	93	-	1,348	1,025	7,577	10,192
Long-Term	-	-	561	1,791	1,183	-	3,535
Balance at 31 March 2022	149	93	561	3,139	2,208	7,577	13,727

The individual provisions are described below. An estimate has been made of the likely cashflows between years; however, the timing of these is uncertain.

**Termination (£0.150m)** – for planned future redundancy costs arising from the detailed saving proposals approved as part of the 2020-21 Budget. No new redundancies were budgeted as part of savings plans for 2022-23.

**Personal Search fees (£0.093m)** – Whilst Personal Search companies have claimed for refunds from the Council, given that the Council's and other authorities charging policies were based on a statutory fee, the Council is reclaiming any repayment from the government in due course.

**MMI** scheme of arrangement provision (£0.561m) – these amounts set aside to fund historic liabilities which were insured but are not fully funded by the insurance company.

Outstanding Legal Cases & Injury & Damage Compensation Claim Insurance provisions (£3.139m and £2.208m) – These provisions bear the risk of day to day losses as an alternative to providing insurance cover through external insurance companies. Losses over £250,000 are externally insured. The main areas provided for are:

	Analysis of Insurance Provision (Outstanding Legal Cases & Injury and	2021-22
£000	Damage Compensation Claims)	£000
12	Property	12
9	Other	-
6,295	Liability	4,848
325	Motor	487
6,641	Total	5,347

**Business Rates Appeals (£7.577m)** – The provision reflects the estimate of the amount of Business Rates to be repaid to ratepayers, following any future successful appeals against rateable values.

### Note 20. Unusable Reserves

2020-21		2021-22
£000		£000
175,350	(a) Revaluation Reserve	186,431
148,854	(b) Capital Adjustment Account	171,021
(5,408)	(c) Financial Instruments Adjustment Account	(5,132)
(1,234,891)	(d) Pensions reserve	(870,558)
1,161	(e) Deferred capital receipts reserve	718
(34,881)	(f) Collection Fund Adjustment Account	(19,800)
(13,184)	(g) Accumulated Absences Account	(13,613)
(962,999)	Total Unusable Reserves	(550,933)

# a) Revaluation Reserve

The Revaluation Reserve is a store of changes to the measurable value of assets compared to the cost of acquiring them. In 2021-22, the Reserve has increased from £175.350m to £186.431m, an increase of £11.081m.

2020-21		2021-22
£000		£000
174,538	Balance at 1 April	175,350
12,121	Upward revaluation of assets	49,758
(5,175)	Downward revaluation of assets not charged to the Surplus or Deficit on the Provision of Services	(30,707)
-	Impairments not charged to the Surplus or Deficit on the Provision of Services	-
6,946	Surplus or deficit on revaluation of non-current assets not posted to the Surplus or Deficit on the Provision of Services	19,051
(3,161)	Difference between fair value depreciation and historical cost depreciation	(3,077)
(2,973)	Accumulated gains on assets sold or scrapped	(4,893)
(6,134)	Amount written off to the Capital Adjustment Account	(7,970)
175,350	Balance at 31 March	186,431

# b) Capital Adjustment Account

The Capital Adjustment Account absorbs the timing differences arising from the different arrangements for accounting for the consumption of non-current assets and for financing the acquisition, construction or enhancement of those assets under statutory provisions.

2020-21		2021-22
£000		£000
146,601	Balance at 1 April	148,854
	Reversal of items relating to capital expenditure debited or credited to the Comprehensive Income and Expenditure Statement:	
(33,681)	- Charges for depreciation and impairment of non-current assets	(34,804)
(6,878)	- Revaluation losses on Property, Plant and Equipment	(5,378)
(143)	- Amortisation of Intangible Assets	(117)
(2,213)	- Revenue expenditure funded from capital under statute (REFCUS)	(2,962)
(16,502)	- Amounts of non-current assets written off on disposal or sale as part of the gain/loss on disposal to the Comprehensive Income and Expenditure Statement	(18,590)
6,134	- Adjusting amounts written out of the Revaluation Reserve	7,970
	Net written out amount of the cost of non-current assets consumed in the year	
	Capital financing applied in the year :	
2,980	- Use of the Capital Receipts Reserve to finance new capital expenditure	4,163
2,097	- Use of Capital Receipts Reserve to pay debt	-
26,533	- Capital grants and contributions credited to the Comprehensive Income and Expenditure Statement that have been applied to capital financing	25,198
625	- Application of grants to capital financing from the Capital Grants Unapplied Account	9,402
1,912	- Allocation of grants to capital financing from the Capital Grants Receipts in Advance Account	3,982

-	- Donated assets and contributions credited to the Comprehensive Income and Expenditure Statement that have been applied to capital financing	-
24,435	- Statutory provision for the financing of capital investment charged against the General Fund	24,647
4,897	- Capital expenditure charged against the General Fund balance	2,942
(7,943)	<ul> <li>Movements in the market value of Investment Properties debited or credited to the Comprehensive Income and Expenditure Statement</li> </ul>	5,714
148,854	Balance at 31 March	171,021

# c) Financial Instruments Adjustment Account

The Financial Instruments Adjustment Account absorbs the timing differences arising from the different arrangements for accounting for income and expenses relating to certain financial instruments and for bearing losses or benefiting from gains per statutory provisions.

2020-21		2021-22
£000		£000
(5,684)	Balance at 1 April	(5,408)
	Premiums incurred in year	
257	Proportion of premiums and discounts incurred in previous financial years to be	256
	charged against the General Fund Balance in accordance with statutory requirements	
19	Removal of Effective Interest Rate on stepped interest loans	20
	Amount by which finance costs charged to the Comprehensive Income and Expenditure Statement are different from finance costs chargeable in the year in accordance with	
276	statutory requirements	276
(5,408)	Balance at 31 March	(5,132)

# d) Pensions Reserve

The Pensions Reserve absorbs the timing differences arising from the different arrangements for accounting for post- employment benefits and for funding benefits in accordance with statutory provisions. See Note 27 for full explanation.

2020-21		2021-22
£000		£000
(1,046,169)	Balance at 1 April	(1,234,891)
(127,238)	Remeasurement of net defined benefit liability	453,060
(109,607) 48,123	Reversal of items relating to retirement benefits debited or credited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement Employer's pensions contributions and direct payments to pensioners payable in the year	(138,684) 49,957
(1,234,891)	Balance at 31 March	(870,558)

# e) Deferred Capital Receipts

The Deferred Capital Receipts Reserve holds the gains recognised on the disposal of non-current assets but for which cash settlement has yet to take place. Under statutory arrangements, the Council does not treat these gains as usable for financing new capital expenditure until they are backed by cash receipts. When the deferred cash settlement eventually takes place, amounts are transferred to the Capital Receipts Reserve.

2020-21		2021-22
£000		£000
1,453	Balance at 1 April	1,161
(292)	Transfer of deferred sale proceeds credited as part of the gain/loss on disposal to the comprehensive income and expenditure statement Transfer to the Capital Receipts Reserve upon receipt of cash	10 (453)
1,161	Balance at 31 March	718

# f) Collection Fund Adjustment Account

The Collection Fund Adjustment Account manages the differences arising from the recognition of Council Tax and Business Rates income in the Comprehensive Income and Expenditure Statement as it falls due compared with the statutory arrangements for paying across amounts to the General Fund from the Collection Fund.

2020-21		2021-22
£000		£000
1,222	Balance at 1 April	(34,881)
	Amount by which council tax and business rates income credited to the Comprehensive Income and Expenditure Statement is different from council tax and business rates	
(36,103)	income calculated for the year in accordance with statutory requirements	15,081
(34,881)	Balance at 31 March	(19,800)

# g) Accumulated Absences Account

The Accumulated Absences Account absorbs the differences that would otherwise arise on the General Fund Balance from accruing for compensated absences earned but not taken in the year, e.g., annual leave entitlement carried forward at 31 March. Statutory arrangements require that the impact on the General Fund Balance is neutralised by transfers to or from the account.

2020-21		2021-22
£000		£000
(10,241)	Balance at 1 April	(13,184)
10,241	Settlement or cancellation of the accrual made at the end of the preceding year	13,184
(13,184)	Amounts accrued at the end of the current year	(13,613)
	Amount by which officer remuneration charged to the Comprehensive Income and Expenditure Statement is different from remuneration chargeable in the year in	
(2,943)	accordance with statutory requirements.	(429)
(13,184)	Balance at 31 March	(13,613)

# Note 21. Cash Flow Statement

# a) Operating activities

The cash flows for operating activities include the following items:

2020-21		2021-22
£000£		£000
310	Interest Received	239
(33,692)	Interest paid	(33,000)
751	Dividends Received	264

# b) Investing Activities

The cash flows for investing activities include the following items:

2020-21		2021-22
£000£		£000
(49,193)	Purchase of property, plant and equipment, investment property and intangible assets	(71,616)
(172,199)	Purchase of short term and long term investments	(238,890)
· · · · · · · · · · · · · · · · · · ·	Other payments for investing activities	(5,152)
5,077	Proceeds from the sale of property, plant and equipment, investment property and intangible assets	4,322
111,193	Proceeds from short term and long term investments	230,395
51,284	Other receipts from investing activities	84,458
(53,838)	Net cash flows from investing activities	3,517

# c) Financing Activities

The cash flows for financing activities include the following items:

2020-21		2021-22
£000		£000
19,999	Cash receipts of short and long term borrowing	42,192
-	Other receipts from financing activities	-
(8,116)	Cash payments for the reduction of the outstanding liabilities relating to finance leases and on Balance Sheet PFI contracts	(8,242)
(31,979)	Repayments of short and long term borrowing	(5,648)
(32,296)	Other payments for financing activities	13,698
(52,392)	Net cash flows from financing activities	42,000

# d) Reconciliation of the Surplus on the Provision of Services (See Comprehensive Income and Expenditure Account) to Operating Activities Net Cash Flow

2020-21	Reconciliation of the Surplus on Revenue to Operating Revenue Activities Net Cash Flow	2021-22
£000		£000
(39,294)	Net deficit (-) / surplus for year on the Comprehensive Income and Expenditure Account	(62,497)
	Add back non-cash items:	
33,681	Depreciation & impairment	34,804
6,878	Impairment, revaluation gains and losses	5,378
143	Amortisation	117
61,484	IAS19 Pension adjustments	88,727
-	Donated Assets non-cash funding	
	Items on accruals basis:	
(3,484)	(Increase) / decrease in inventories	595
(16,113)	(Increase) / decrease in amounts due from Council (debtors)	(6,457)
86,667	Increase / (decrease) in amounts due to Council (creditors)	5,754
16,502	Carrying amount of disposals	18,590
(8,780)	Movement in provisions	(2,061)
	Other non-cash items charged to the net surplus or deficit on the provision of	
7,924	services	(5,732
184,902	Removal of non-cash items included in Deficit/Surplus on Provision of services	139,715
	Adjustments for items included in the net surplus or deficit on the provision of services that are investing and financing activities	
(46,103)	Capital Grants credited to surplus or deficit on the provision of services	(84,850)
. , -,	Proceeds from the sale of property, plant and equipment, investment property and	
(4,785)	intangible assets	(3,879)
(50,888)	Sub-total items for items included in the net surplus or deficit on the provision of services that are investing and financing activities	(88,729)
94,720	Operating activities - net cash flow	(11,511)

# e) Reconciliation of Liabilities Arising from Financing Activities

	1 April 2021	Financing cash flows	Changes which are not financing cash flows		31 March 2022
			Other cash flows	Other non cash changes	
	£000	£000	£000	£000	£000
Long-term borrowings	330,531	4,494	-2	-15,529	319,494
Short-term borrowings	8,964	32,189	(3,453)	18,860	56,560
Lease Liabilities	931	(309)	-	173	795
On balance sheet PFI					
Liabilities	153,999	(7,933)	-		146,066
Transferred debt	3,810	(137)	-	-	3,673
Amounts owed to/from					
Collection Fund preceptors	(28,753)	13,698	-	-	(15,055)
Total Liabilities from financing activities	469,482	42,002	(3,455)	3,504	511,533

# Note 22. 2021-22 Expenditure Funding Analysis

The objective of the Expenditure and Funding Analysis is to demonstrate to Council Tax and rent payers how the funding available to the Council (i.e., government grants, rents, Council Tax and Business Rates) for the year has been used in providing services in comparison with those resources consumed or earned by the Council in accordance with generally accepted accounting practices. The analysis also shows how this expenditure is allocated for decision making purposed between the Council's Services. A more detailed breakdown of the adjustments between funding and accounting basis, called Analysis of Accounting Changes, is shown below:

	Net expenditure for 2021-22 Outturn Statement	Reclassification for the CIES	Expenditure in	Funding and	Net Expenditure Chargeable to the General Fund
	£000	£000	£000	£000	£000
	Α	В	C = A + B	D	E = C + D
Health and Wellbeing Children's Services Department of Place Chief Executive Corporate Resources Non-Service Budgets Central Budgets	121,756 131,341 123,251 4,863 54,842 (48,894) (19,606)	6,956 7,311	130,562 5,099 63,858	(12,650) (36,587) (50,809) (926) (15,529) 9,196	111,257 101,709 79,753 4,172 48,329 10,266 24,698
Net Cost of Services	367,553	119,937	487,488	(107,305)	380,184
Other Operating Expenditure Financing and Investment income and expenditure	-	17,381 54,919	17,381 54,919	(14,721) (23,162)	2,660 31,757
Taxation and non-specific grant income Earmarked Reserves Increase in School Delegated Balances Statutory Provision for the financing of capital expenditure	(385,373) - - -	(111,920) - - -	(497,292) - - -	79,439 (32,823) 3,710 4,500 24,647	(417,853) (32,823) 3,710 4,500 24,647
Capital expenditure charged against the General Fund	-	-	-	2,942	2,942
Financial Instruments Adjustment Account	-	-	-	276	276
Surplus (-)/Deficit on Provision of Services				(62,497)	(-)
General Fund Balance brought forward General Fund Balance carried forward					15,000 19,500

# 2020-21 Expenditure Funding Analysis

The Expenditure and Funding Analysis for 31 March 2021 is as follows:

	Net expenditure for 2020-21 Outturn Statement £000	Reclassification for the CIES	Expenditure in the CIES £000	•	Expenditure Chargeable to the General Fund £000
	Α	В	C = A + B	D	E = C + D
Health and Wellbeing Children's Services	115,096 95,684	5,667 7,385	120,763 103,069 124,386	(8,229) (34,072)	112,534 68,997 84,833
Department of Place Chief Executive	106,609 4,617	17,777 797	124,366 5.414	(39,553) (592)	4,822
Corporate Resources Non Service Budgets	53,798 (20,044)	778 29,021	54,576 8,977	(7,606) 2,988	46,969 11,965
Central Budget	22,331	(1,399)	20,932	-	20,932
Net Cost of Services	378,091	60,026	438,117	(87,064)	351,052
Other Operating Expenditure Financing and Investment Income and Expenditure	-	14,309 67,178	14,309 67,178	(11,764) (33,626)	2,545 33,552
Taxation and non-specific grant income Earmarked Reserves Increase in School Delegated Balances Statutory Provision for the financing of capital investment	(378,091) - - -	(102,218) - - -	(480,309) - - -	3,091 49,522 10,941 24,435	(477,218) 49,522 10,941 24,435
Capital Expenditure charged against the General Fund	-	-	-	4,897	4,897
Financial Instruments Adjustment Account	-	-	-	275	275
Surplus (-)/Deficit on Provision of Services				(39,293)	(0)
General Fund Balance brought forward General Fund Balance carried forward					15,000 15,000

2021-22 Analysis of Accounting Adjustments

	Earmarked Reserves	Adjustments for Capital Purposes	Net Change for the Pensions Adjustments	Other Differences (Employee Accrual)	Differences (Collection	Total Adjustments
	£000	£000	£000	£000	Instruments £000	conn
Health and Wellbeing	-	1,472	11,105	73	_	12,650
Children's Services	-	6,726	29,599	263		36,587
Department of Place	-	33,966	16,777	65		50,809
Chief Executive	-	, -	936	(10)	-	926
Corporate Resources	-	4,788	10,668	73	-	15,529
Non Service	-	1	(9,187)	(10)	-	(9,196)
Central Budget & Net Transfers to Reserves	-	-	-	-	-	-
Net Cost of Services	-	64,773	59,898	455	-	107,305
Other Operating Expenditure	-	14,721	-	-	-	14,721
Financing and Investment income and	=	(5,643)	28,830	(25)	-	23,162
expenditure		, , ,	,	,		
Taxation and non-specific grant income	-	(64,357)	-	-	(15,082)	(79,439)
Earmarked Reserves	32,823	=	-	-	-	32,823
Increase in School Delegated Balances	(3,710)	-	-	-	-	(3,710)
Increase in General Fund Reserve	(4,500)	-				(4,500)
Minimum Revenue Provision	=	(24,647)	-	-	-	(24,647)
Direct Revenue Financing	-	(2,942)	-	-	-	(2,942)
Financial Instrument Adjustment Account	-	-	-	-	(276)	(276)
Total Adjustments between accounting basis & funding basis under regulations	24,613	(18,094)	88,727	430	(15,358)	62,497

# 2020-21 Analysis of Accounting Adjustments

	Earmarked Reserves £000	Adjustments for Capital Purposes £000	Net Change for the Pensions Adjustments £000	Other Differences (Employee Accrual) £000		Adjustments
Health and Wellbeing	-	1,657	5,992	580	-	8,229
Children's Services	-	15,863	17,480	729	-	34,072
Department of Place	-	29,395	9,299	859	-	39,553
Chief Executive	-	-	540	52	-	592
Corporate Resources		1,336	5,736	534	_	7,606
Non Service	_	1,550	(2,992)	2	-	(2,989)
Central Budget & Net Transfers to Reserves	-	-	(=,===)	-	-	(=,555)
Net Cost of Services	-	48,252	36,055	2,756	-	87,063
Other Operating Expenditure	-	11,764	-	-	-	11,764
Financing and Investment income and		0.040	05.400	400		22.000
expenditure	-	8,010	25,430	186	-	33,626
Taxation and non-specific grant income	-	(39,194)	-	-	36,103	(3,091)
Earmarked Reserves	(49,522)	-	-	-	-	(49,522)
Reduction in School Delegated Balances	(10,941)	-	-	-	-	(10,941)
Minimum Revenue Provision	-	(24,435)	-	-	-	(24,435)
Direct Revenue Financing	-	(4,897)	-	-	-	(4,897)
Financial Instrument Adjustment Account	-	-	-		(275)	(275)
Total Adjustments between accounting basis & funding basis under regulations	(60,463)	(500)	61,485	2,941	35,828	39,293

# **Nature of Expenditure**

The Council's expenditure and income is anlaysed as follows:

2020-21	Expenditure and Income Analysed by Nature	2021-22
£000		£000
	Expenditure	
493,980	Employee Benefits	540,644
660,329	Other Service Expenses	714,663
48,710	Depreciation, amortisation, impairment	35,030
33,630	Interest Payments	32,878
23,513	Net Interest on the Pension Net defined benefit liability / (asset)	25,412
24,770	Precepts and Levies	25,566
1	Payments to Housing Capital Receipts Pool	-
11,764	(Gain) / Loss on the disposal of assets	14,737
1,296,696	Total Expenditure	1,388,939
	Income	
(117,273)	Fees, charges and other service Income	(151,291)
(1,011)	Interest and investment income	(601)
(239,885)	Income from council tax, non-domestic rates	(268,960)
(899,234)	Grants and Contributions	(905,580)
(1,257,403)	Total Income	(1,326,432)
39,293	Surplus or Deficit on the Provision of Service	62,497

# Note 23. Acquired and Discontinued Operations

There were no acquired or discontinued operations during 2021-22 or 2020-21.

#### Note 24. Pooled Budgets

#### **Better Care Fund**

The Better Care Fund (BCF) is a programme spanning both the NHS and local government. It has been created to improve the lives of some of the most vulnerable people in our society, placing them at the centre of their care and support, and providing them with "wraparound" fully integrated health and social care, resulting in an improved experience and better quality of life.

The BCF agreement has been set up under Section 75 of the NHS Act 2006. The total BCF and iBCF in 2021-22 was £69.790m. It is a pooled budget with Bradford District and Craven Clinical Commissioning Group.

	2020-21	2021-22
	£000	£000
Funding provided		
Bradford & Airedale Community Equipment	1,563	1,563
Care Bill Implementation support	1,417	1,417
Protect Social Services	17,371	18,473
Re-ablement	1,558	1,558
Carers	960	960
Capital Funding	5,137	5,137
Total LA Better Care Fund	28,006	29,107
Better Care Fund	17,021	17,982
iBCF	22,701	22,701
Total Better Care Fund funding	67,728	69,790
Total expenditure	64,696	69,394
Surplus/(Deficit) C/fwd to next year	3,032	396

Whilst the section 75 agreement between Bradford District and Craven CCG and and City of Bradford Metropolitan District Council does constitute a 'joint operation' under IFRS 11, the substance of the commissioning transactions related to the Fund's spending plans indicate that neither Bradford District and Craven CCG nor City of Bradford Metropolitan District Council are either a joint operator or lead commissioner, but are acting as single entities, with the exception of the Community Equipment Scheme. Therefore, each organisation accounts for its own transactions without recognising its interest in its share of total assets, liabilities, revenue and expenditure that relate to the whole Fund.

For the Community Equipment scheme where there is a joint operation. The clinical commissioning group's share of assets and liabilities relating to the Community Equipment scheme are not recognised in the Accounts as the values are not considered to be material.

### Note 25. Termination Benefits

In 2021-22 the Council incurred voluntary and compulsory redundancy costs of £0.394m (£0.258m in 2020-21) together with £0.157m (£0.363m in 2020-21) for early retirement pension costs. The costs relate to the Council's plans to reduce its expenditure to help to offset the impact of significant Government grant reductions.

# Note 26. Pension Schemes Accounted for as Defined Contribution Schemes

Teachers employed by the Council are members of the Teachers' Pension Scheme, administered by Capita Teachers' Pensions on behalf of the Department for Education (DfE). The Scheme provides teachers with specified benefits upon their retirement, and the Council contributes towards the costs by making contributions based on a percentage of members' pensionable salaries.

The scheme is a multi-employer defined benefit scheme. The scheme is unfunded and the Department of Education uses a notional fund as the basis for calculating the employers' contribution rate paid by local authorities. Valuations of the notional fund are undertaken every four years.

The scheme had 11,885 participating employers in 2020-21, including 172 local authorities, and, consequently, the Council is not able to identify its share of the underlying financial position and performance of the scheme with sufficient reliability for accounting purposes. For the purposes of this Statement of Accounts, it is therefore accounted for on the same basis as a defined contribution scheme. As a proportion of the total expected contributions into the Teachers' Pension Scheme during the year ending 31 March 2022, the Council's own contributions equate to approximately 0.21%.

In 2021-22, the Council paid £18.889m to Teachers' Pensions in respect of teachers' retirement benefits, representing 23.68% of pensionable pay. The figures for 2020-21 were £19.328m and 23.68%. There were contributions remaining payable at the year-end of £1.570m. The contributions due to be paid in the next financial year are estimated to be £17.690m.

The Council is responsible for the costs of any additional benefits awarded upon early retirement outside of the terms of the Teachers' Pension Scheme. These costs are accounted for on a defined benefit basis and detailed in Note 27. The Council is not liable to the scheme for any other entities' obligations under the plan.

A number of Council employees are also members of the NHS Pension Scheme, administered by NHS Pensions on behalf of the Department for Health and Social Care (DoHSC). The Scheme provides the relevant employees with specified benefits upon their retirement, and the Council contributes towards the costs by making contributions based on a percentage of members' pensionable salaries.

The scheme is a multi-employer defined benefit scheme. The scheme is unfunded and the Department of Health uses a notional fund as the basis for calculating the employers' contribution rate paid by local authorities. Valuations of the notional fund are undertaken every four years.

The scheme had 8,057 participating employers as at 31 March 2021, including 133 local authorities, and, consequently, the Council is not able to identify its share of the underlying financial position and performance of the scheme with sufficient reliability for accounting purposes. For the purposes of this Statement of Accounts, it is therefore accounted for on the same basis as a defined contribution scheme. As a proportion of the total expected contributions into the NHS Pension Scheme during the year ending 31 March 2022, the Council's own contributions equate to approximately 0.001%.

In 2021-22, the Council paid £0.143m to NHS Pensions in respect of the relevant employees' retirement benefits, representing 14.38% of pensionable pay, plus an additional £0.24m, representing 2.5% of pensionable pay. The figures for 2020-21 were £0.139m and 14.38%, plus an additional £0.24m and 2.5%. There were contributions remaining payable at the year-end of £0.013m. The contributions due to be paid in the next financial year are estimated to be £0.286m.

The Council is responsible for the costs of any additional benefits awarded upon early retirement outside of the terms of the NHS Pension Scheme. These costs are accounted for on a defined benefit basis and detailed in Note 27.

The Council is not liable to the scheme for any other entities' obligations under the plan.

#### Note 27. Defined Benefit Pension Schemes

### **Participation in Pension Schemes**

As part of the terms and conditions of employment of its officers, the Council makes contributions towards the cost of postemployment benefits. Although these benefits will not actually be payable until employees retire, the Council has a commitment to make the payments (for those benefits) and to disclose them at the time that employees earn their future entitlement.

The Council participates in two post-employment schemes:

- a) The Local Government Pension Scheme, administered through a number of separate regional funds. The Council is a member of the West Yorkshire Pension Fund this is a funded career average defined benefit scheme. This means that the Council and employees pay contributions into a fund, calculated at a level intended to balance the pensions liabilities with investment assets, determined by the fund's professionally qualified actuary at 31 March 2019 for the three years 1 April 2020 to 31 March 2023. The contribution rates set by the actuary are intended to balance the fund's liabilities with the investment assets over the period. The employer contribution rate for the year 2021-22 in respect of Bradford members of the West Yorkshire Pension Fund was 17.1%.
- b) Arrangements for the award of discretionary post-retirement benefits upon early retirement these are unfunded defined benefit arrangements, under which liabilities are recognised when awards are made. However, there are no investment assets built up to meet these pensions liabilities, and cash has to be generated to meet actual pensions payments as they eventually fall due.

The West Yorkshire Pension Fund pension scheme is operated under the regulatory framework for the Local Government Pension Scheme. City of Bradford Metropolitan District Council, as administering authority for West Yorkshire Pension Fund (WYPF) with statutory responsibility for the management and administration of the Fund, has delegated legal and strategic responsibility for the WYPF to the Governance and Audit Committee. The Council has established three bodies to assist and support the Governance and Audit Committee in overseeing the Fund, namely the WYPF Pension Board, WYPF Investment Advisory Panel and the WYPF Joint Advisory Group. Policy is determined in accordance with the Pensions Fund Regulations. The Fund's entire investment portfolio is managed on a day to day basis in-house, supported by the Fund's external advisers.

The principal risks to the Council of the scheme are the longevity assumptions, statutory changes to the scheme, structural changes to the scheme (i.e. large-scale withdrawals from the scheme), changes to inflation, bond yields and the performance of the equity investments held by the scheme. These are mitigated to a certain extent by the statutory requirements to charge to the General Fund the amounts required by statute, as described in the accounting policies note.

# **Discretionary Post-Retirement Benefits**

Discretionary post-retirement benefits on early retirement are an unfunded defined benefit arrangement, under which liabilities are recognised when awards are made. There are no plan assets built up to meet these pension liabilities.

# **Transactions Relating to Post-Employment Benefits**

The Council recognises the cost of retirement benefits in the reported cost of services when they are earned by employees, rather than when the benefits are eventually paid as pensions. However, the charge the Council is required to make against Council Tax (i.e. the statutory amount charged against the General Fund balance) is based on the cash payable in the year (i.e. the total contribution paid by the Council under the pension regulations), so the real cost of post-employment/retirement benefits is reversed out of the General Fund via the Movement in Reserves Statement. The following transactions have been made in the Comprehensive Income and Expenditure Statement and the General Fund Balance via the Movement in Reserves Statement during the year:

during the year:			Local (	Government	Teacher	s Voluntary		
		overnment		on Scheme	,	Retirement		Total
	Pensio	on Scheme		ary Benefits angements		angements		
	2020-21	2021-22	2020-21	2021-22	2020-21	2021-22	2020-21	2021-22
	£000	£000	£000	£000	£000	£000	£000	£000
Comprehensive Income and Expenditure								
Statement								
Cost of Services:	00.040	440.070					00.040	112 272
Current service cost*	80,049	113,272	-	-	-	-	80,049	113,272
Past service costs	6,045	-	-	-	-	-	6,045	-
Gain (-) / loss from settlements	-	-	-	-	-	-	-	-
Financing and Investment Income and								
Expenditure  Net interest expense	21,036	23,147	878	799	1,599	1,466	23,513	25,412
Total Post-Employment Benefit Charged	21,030	23,147	0/0	133	1,555	1,400	23,313	25,412
to the Surplus or Deficit on Provision of	107,130	136,419	878	799	1,599	1,466	109,607	138,684
Services	101,100	100,110	0.0		1,000	.,	.00,001	.00,00
Other Post-Employment Benefit Charged								
to the Comprehensive Income and								
Expenditure Statement								
Re-measurement of the net defined benefit								
liability comprising:								
Return on plan assets (excluding the amount	(402,441)	(209,495)	-	-	-	-	(402,441)	(209,495)
included in the net interest expense)								
Actuarial gains (-) and losses arising on	-	(33,843)	-	(546)	-	(991)	-	(35,380)
changes in demographic assumptions								
Actuarial gains (-) and losses arising on	572,512	(215,298)	2,750	(880)	5,162	(1,662)	580,424	(217,840)
changes in financial assumptions  Actuarial gains (-) and losses due to liability								(217,040)
experience	(49,190)	9,243	(550)	145	(1,005)	267	(50,745)	9,655
Total Post-Employment Benefit charged to								
the Comprehensive Income and	228,011	(312,974)	3,078	(482)	5,756	(920)	236,845	(314,376)
Expenditure Statement								
Movement in Reserves Statement								
· Reversal of net charges made to the Surplus								
or Deficit for the Provision of Service for post-	(107,130)	(136,419)	(878)	(799)	(1,599)	(1,466)	(109,607)	(138,684)
employment retirement benefits in accordance	( - , ,	(120,110)	( /	( )	( ,===,	(1,100)	(, ,	(, ,
with the Code								
Actual amount charged against the General								
Fund balance for pensions in the year:								
Employers' contributions payable to the	39,310	41,427	-	-	-	-	39,310	41,427
scheme Retirement benefits payable to pensioners		•	3,269	3,144	5,544	5,386	8,813	8,530
- Remember benefits payable to pensioners	-	-	3,209	3,144	5,544	<b>ე,</b> აშნ	0,013	0,530

<sup>\*</sup> The current service cost includes an allowance for the administration expenses of £0.908m in 2021-22 (£1.046m in 2020-21).

# Pensions Assets and Liabilities Recognised in the Balance Sheet

The amount included in the Balance Sheet arising from the Council's obligation in respect of its defined benefit plans is as follows:

Pensions Assets and Liabilities Recognised in the Balance Sheet	Local Government Pension Scheme		Pe Discreti	Local Government Pension Scheme Discretionary Benefits Arrangements		ners Voluntary rly Retirement onary Benefits Arrangements	Total Per Balance Sheet		
	2020-21 £000	2021-22 £000		2021-22 £000				2021-22 £000	
Present value of the defined benefit obligation	3,477,897	3,348,870	39,604	35,978	72,483	66,177	3,589,984	3,451,025	
Fair value of plan assets	2,355,092	2,580,466	-	-	-	-	2,355,092	2,580,466	
Impact of minimum funding requirement/asset ceiling	-		-	-	-	-	-	-	
Net liability arising from defined benefit obligation - closing balance at 31 March	1,122,805	768,404	39,604	35,978	72,483	66,177	1,234,892	870,559	

Reconciliation of the Movements in the Fair Value of Scheme (Plan) Assets:

Reconciliation of the Movements in the Fair Value of Scheme (Plan) Assets:	Local Government Pension Scheme		Per Discretion	I Government nsion Scheme onary Benefits Arrangements	Ea	ners Voluntary rly Retirement Discretionary Benefits Arrangements	Total		
	2020-21 £000	2021-22 £000	2020-21 £000	2021-22 £000				2021-22 £000	
Opening balance at 1 April	1,946,509	2,355,092	-	-	-	-	1,946,509	2,355,092	
Interest income on assets	44,345	49,118	-	-	-	-	44,345	49,118	
Remeasurement gains and losses (-) on assets	402,441	209,495	-	-	-	-	402,441	209,495	
Contributions from employer	39,310	41,427	3,269	3,144	5,544	5,386	48,123	49,957	
Contributions from employees into the scheme	14,489	15,167	-	-	-	-	14,489	15,167	
Benefits paid*	(92,002)	(89,833	(3,269)	(3,144)	(5,544)	(5,386)	(100,815)	(98,363)	
Net increase in assets from disposals/acquisitions Settlements	-	-	-	-	-	-	-	-	
Closing balance at 31 March	2,355,092	2,580,466	-	-	-	-	2,355,092	2,580,466	

<sup>\*</sup> Consists of net benefits cash-flow out of the Fund in respect of the employer, including an approximate allowance for the expected cost of death in service lump sums and Fund administration expenses.

Reconciliation of Present Value of the Scheme Liabilities (Defined Benefit Obligation):

Reconciliation of Present Value of the Scheme Liabilities (Defined Benefit Obligation):	Local G Pensio	Liabilities: overnment on Scheme	Local Go Pension Dis	Liabilities: overnment on Scheme scretionary	Unfunded Liabilities: Teachers Voluntary Early Retirement Discretionary		Total	
	2020-21	2021-22	2020-21	2021-22	2020-21	2021-22	2020-21	2021-22
	£000	£000	£000	£000	£000	£000	£000	£000
Opening balance at 1 April	2,880,613	3,477,897	39,795	39,604	72,271	72,483	2,992,679	3,589,984
Current service cost	80,049	113,272	-	-	-	-	80,049	113,272
Interest cost	65,381	72,265	878	799	1,599	1,466	67,858	74,530
Contributions from scheme participants	14,489	15,167	-	-	-	-	14,489	15,167
Remeasurement gains (-) and losses:							-	-
Actuarial gains (-) and losses arising from changes in demographic assumptions	-	(33,843)	-	(546)	-	(991)	-	(35,380)
Actuarial gains (-) and losses arising from changes in financial assumptions	572,512	(215,298)	2,750	(880)	5,162	(1,662)	580,424	(217,840)
Actuarial gains (-) and losses due to liability experience	(49,190)	9,243	(550)	145	(1,005)	267	(50,745)	9,655
Past service costs	6,045	-	-	-	-	-	6,045	-
Benefits paid	(92,002)	(89,833)	(3,269)	(3,144)	(5,544)	(5,386)	(100,815)	(98,363)
Net increase in liabilities from disposals/acquisitions	-	-	-	-	-	-	-	-
Liabilities extinguished on settlements	-	-	-	-	-	-	-	-
Closing balance at 31 March	3,477,897	3,348,870	39,604	35,978	72,483	66,177	3,589,984	3,451,025

The split of the defined benefit obligation at the last valuation date between the various categories of members was as follows:

Active Members 38% Deferred Pensioners 17% Pensioners 45%

# **Local Government Pension Scheme Assets**

Assets in the West Yorkshire Pension Fund are valued at fair value (principally, market value for investments). The following table shows the value of each category of asset and expresses it as a percentage of the total value.

The Discretionary Benefits arrangements have no assets to cover its liabilities. The Local Government Pension Scheme's assets consist of the following categories, by proportion of the total assets held:

Asset Category	31st March 2021			31st March 2022		31st March 2022	31st March 2022	31st March 2022
	Total	Total	Quoted	Quoted	Unquoted	Unquoted	Total	Total
	£000	%	£000	%	£000	%	£000	%
Equity investments	1,898,204	80.6	1,749,556	67.8	309,656	12.0	2,059,212	79.8
Government bonds	193,118	8.2	190,955	7.4	-	-	190,955	7.4
Other bonds	91,849	3.9	123,862	4.8	-	-	123,862	4.8
Cash	47,102	2.0	-	-	74,834	2.9	74,834	2.9
Property	89,493	3.8	41,287	1.6	61,931	2.4	103,218	4.0
Other assets	35,326	1.5	-	-	28,385	1.1	28,385	1.1
Total	2,355,092	100	2,105,660	81.6	474,806	18.4	2,580,466	100

A more detailed breakdown of assets and associated risks are published in the accounts for the West Yorkshire Pension Fund, please refer to:

- the West Yorkshire Pension Fund Financial Statements and Explanatory Notes in City of Bradford Metropolitan District Council's accounts, available at <a href="https://www.bradford.gov.uk">www.bradford.gov.uk</a>
- the West Yorkshire Pension Fund Report and Accounts, available at <a href="https://www.wypf.org.uk">www.wypf.org.uk</a>

### **Basis for Estimating Assets and Liabilities**

Liabilities have been assessed on an actuarial basis using the projected unit credit method, an estimate of the pensions that will be payable in future years, dependent on assumptions about mortality rates, salary levels, etc.

Both the Local Government Pension Scheme and discretionary benefits liabilities have been assessed by Aon Hewitt Limited, an independent firm of actuaries, with estimates for the West Yorkshire Pension Fund being based on the latest full valuation of the scheme as at 31 March 2019. The significant assumptions used in the Actuary's assessments of assets and liabilities have been:

	Local Governme	nt Pension Scheme		rnment Pension tionary Benefits	Teachers Voluntary Early Retirement Discretionary Benefits		
	31-Mar-21	31-Mar-22	31-Mar-21	31-Mar-22	31-Mar-21	31-Mar-22	
Mortality Assumptions	years	years	years	years	years	years	
Longevity at 65 for current pensioners (aged 65 at accounting date):							
Men	21.9	21.8	21.9		21.9		
Women	24.7	24.6	24.7	24.8	24.7	24.6	
Longevity at 65 for future pensioners (aged 45 at accounting date):							
Men	22.6	22.5	-	-	-	-	
Women	25.8	25.7	-	-	-	-	

Commutation i.e. take-up of option to convert annual pension into retirement lump sum. Each member was assumed to surrender pension on retirement, such that the total cash received (including any accrued lump sum from pre-2008 service) is 75% of the permitted maximum.

Financial assumptions	% per annum					
Rate of CPI inflation	2.7	3.0	2.7	3.0	2.7	3.0
Rate of increase in salaries	3.95	4.25	-	-	-	-
Rate of increase in pensions	2.7	3.0	2.7	3.0	2.7	3.0
Pension accounts revaluation rate	2.7	3.0	-	-	-	-
Discount rate	2.1	2.7	2.1	2.7	2.1	2.7

The estimation of the defined benefit obligations is sensitive to the actuarial assumptions set out in the table above. The sensitivity analysis below has been determined based on reasonably possible changes of the assumptions occurring at the end of the reporting period and assumes for each change that the assumption analysed changes while all the other assumptions remain constant. The assumptions in mortality/longevity, for example, assume that post-retirement mortality age rating increases or decreases for men and women. In practice, this is unlikely to occur, and changes in some of the assumptions may be interrelated. The estimations in the sensitivity analysis have followed the accounting policies for the scheme, i.e. on an actuarial basis using the projected unit credit method. The methods and types of assumptions used in preparing the sensitivity analysis below did not change from those used in the previous period. Sensitivity analysis of unfunded benefits has not been included on materiality grounds.

### Impact on the Defined Benefit Obligation in the Scheme

	Present Value of the Defined Benefit Obligation After Increase in Assumption	Change in Present Value of Defined Benefit Obligation	Present Value of Defined Obligation Benefit After Decrease in Assumption	Change in Present Value of Defined Benefit Obligation
	£000	%	£000	%
Mortality/Longevity i.e. Post-retirement mortality age rating * - increase or decrease by 1 year	3,231,660	-3.5	3,466,080	3.5
Rate of increase in salaries - increase or decrease by 0.1%	3,355,568	0.2	3,342,172	-0.2
Rate of increase in pensions - increase or decrease by 0.1%	3,405,801	1.7	3,291,939	-1.7
Discount rate i.e. Rate for discounting scheme liabilities - increase or decrease by 0.1%	3,285,241	-1.9	3,415,847	2.0

<sup>\*</sup> an increase by 1 year means that members are assumed to follow the mortality pattern for an individual that is 1 year older than them.

### Impact on the Council's Cash Flows

The objectives of the scheme are to keep employers' contributions at as constant a rate as possible. The Council has agreed a strategy with the scheme's actuary to achieve a funding level of 100% over 22 years from 1 April 2014. Funding levels are monitored on an annual basis. The next triennial valuation is due to be completed on 31 March 2022.

The scheme will need to take account of the national changes to the scheme under the Public Pensions Services Act 2013. Under the Act, the Local Government Pension Scheme in England and Wales and the other main existing public service schemes may not provide benefits in relation to service after 31 March 2014 (or service after 31 March 2015 for other main existing public service pension schemes in England and Wales). The Act provides for scheme regulations to be made within a common framework, to establish new career average revalued earnings schemes to pay pensions and other benefits to certain public servants.

The total contributions expected to be made to the Local Government Pension Scheme by the Council in the year to 31 March 2023 are £42.541m.

The total contributions expected to be made for the Local Government Pension Scheme Discretionary Benefits scheme and the Teachers Voluntary Early Retirement Discretionary Benefits scheme in the year to 31 March 2023 are £3.241m and £5.553m, respectively.

The weighted average duration of the funded defined benefit obligation for the Local Government Pension Scheme (LGPS) is 19.5 years at 31 March 2022 (19.5 years at 31 March 2021).

The weighted average duration of the unfunded defined benefit obligation for Local Government Pension Scheme (LGPS) Discretionary Benefits is 8.6 years at 31 March 2022 (8.6 years at 31 March 2021) & the weighted average duration of the unfunded defined benefit obligation for Teachers Voluntary Early Retirement Discretionary Benefits is 8.9 years at 31 March 2022 (8.9 years at 31 March 2021).

### Note 28. Members' Allowances

The Council paid the following amounts to Members during the year.

Members Allowances	2020/21	2021/22
	£000	£000
Basic Allowances	1,208	1,217
Special Responsibility Allowances	564	557
Expenses	1	1
Total	1,773	1,775

### Note 29. Employees' Remuneration

Authorities are required to disclose information on employees' remuneration in excess of £50,000 per annum. Remuneration is defined in the regulations as:

- All amounts paid to or receivable by an employee
- Expense allowances chargeable to tax
- The estimated money value of any other benefits received by an employee otherwise than in cash

Number of Employees 2020-21	Employees Emoluments	Number of Employees 2021-22
184	£50,000 – £54,999	186
95	£55,000 – £59,999	110
41	£60,000 – £64,999	43
45	£65,000 - £69,999	37
42	£70,000 – £74,999	36
24	£75,000 – £79,999	32
18	£80,000 - £84,999	21
8	£85,000 – £89,999	15
5	£90,000 - £94,999	5
7	£95,000 – £99,999	3
2	£100,000 - £104,999	5
4	£105,000 - £109,999	1
0	£110,000 - £114,999	1
0	£115,000 - £119,999	0
1	£120,000 - £124,999	1
0	£125,000 - £129,999	0
1	£130,000 – £134,999	0
2	£135,000 – £139,999	1
0	£140,000 - £144,999	0
0	£145,000 - £149,999	0
0	£150,000 - £154,999	0
1	£155,000 - £159,999	1
0	£160,000 - £164,999	0
0	£165,000 - £169,999	0
0	£170,000 - £174,999	0
0	£175,000 - £179,999 0	
480	Total	498

The above figures include 263 teachers (277 in 2020-21). The Employee Remuneration Note excludes Senior Officers salaries, which is shown in a separate note below.

The above table includes compensation payments for loss of employment.

### **Senior Officers Remuneration**

A Senior Officer is defined as an employee whose salary is more than £150,000 per year, or one whose salary is at least £50,000 per year (to be calculated pro rata for a part-time employee) and who is either:

- a) The designated head of paid service, a statutory chief officer or a non-statutory chief officer of a relevant body, as defined under the Local Government and Housing Act 1989;
- b) A person for whom the head of the authority's paid service is directly responsible,
- c) The head of staff for a relevant body which does not have a designated head of paid service; or
- d) Any person having responsibility for the management of the relevant body, to the extent that the person has power to direct or control the major activities of the body, in particular activities involving the expenditure of money, whether solely or collectively with other persons.

# 2021-22 Senior Officers (excluding Employer Pension contributions)

The following table set out the remuneration disclosures for Senior Officers whose annual salary is more than £150,000.

Post Title	Salary including Fees & Allowances	Expense Allowances	Compensation for loss of Office	Benefits in Kind	Total Remuneration excluding Pensions	Pension Contributions	Total Remuneration including pension contributions
	£	£	£	£	£	£	£
Chief Executive - Kersten England	197,547	-	•	1	197,547	33,780	231,327
Strategic Director Corporate Resources - Joanne Hyde	151,062	1	-	1	151,062	25,832	176,894
Strategic Director Health & Wellbeing - Iain MacBeath	151,062		-	•	151,062	25,832	176,894
Strategic Director Place from 01/09/21 - Jason Longhurst	88,120	-	-	1	88,120	15,068	103,188

# 2021-22 Senior Officers' Remuneration (annual salary is less than £150,000)

Post Title	Salary including Fees & Allowances	Expense Allowances	Compensati on for loss of Office	Benefits in Kind	Total Remuneration excluding Pensions	Pension Contributions	Total Remuneration including pension contributions
	£	£	£	£	£	£	£
Strategic Director Children's Services to 31/10/21	85,679	-	88,403	1	174,082	14,651	188,733
Interim Strategic Director Children's Services from 01/11/21	60,038	-	-	-	60,038	10,266	70,304
Director of Finance & IT	115,471	•	-	•	115,471	19,746	135,217
Director West Yorkshire Pension Fund	115,112	-	-	-	115,112	19,684	134,796
Director of Human Resources	106,677	•	-	-	106,677	18,242	124,919
City Solicitor	106,677	-	-	-	106,677	18,242	124,919
Director of Public Health	106,677	-	-	-	106,677	18,007	124,684
Assistant Director - Office of the Chief Executive from 01/10/21 (previously Acting Assistant Director - Office of the Chief Executive from 29/06/20)	100,749	-	-	-	100,749	17,228	117,977

2020-21 Senior Officers (excluding Employer Pension contributions)

Post Title	Salary including Fees & Allowances	Expense Allowances	Compensation for loss of Office	Benefits in Kind	Total Remuneration excluding Pensions	Pension Contributions	Total Remuneration including pension contributions
	£	£	£	£	£	£	£
Chief Executive	194,628	-	-	441	195,069	33,281	228,350
Strategic Director Corporate Resources	147,459	-	-	-	147,459	25,215	172,674
City Solicitor	105,100	-	-	-	105,100	17,972	123,072
Director of Finance & IT	105,100	-	-	-	105,100	17,972	123,072
Director of Human Resources	105,100	-	-	-	105,100	17,972	123,072
Strategic Director Children's Services	143,336	-	-	-	143,336	24,510	167,846
Strategic Director Health & Wellbeing to 16/08/20	55,495	-	-	-	55,495	-	55,495
Strategic Director Health & Wellbeing from 17/08/20	91,963	-	-	-	91,963	15,726	107,689
Director of Public Health	94,785	-	-	-	94,785	14,833	109,618
Strategic Director Place to 30/11/20	98,306	-	-	-	98,306	16,810	115,116
Assistant Director - Office of the Chief Executive	67,105	-	-	-	67,105	15,775	82,880
Director West Yorkshire Pension Fund	111,231	-	-	-	111,231	19,020	130,251
Acting Assistant Director - Office of the Chief Executive from 29/06/20	73,233	-	-	-	73,233	12,523	85,756

# **Election Duty Remuneration 2021-22**

No elections were held in 2020-21, therefore comparative figures are not available.

Post Title and Holder	Salary £	Pension £	Total £
Chief Executive - Kersten England	13,079	2,237	15,316
Strategic Director Corporate Resources – Joanne Hyde	2,180	373	2,553

### **Exit Packages**

The total cost to the Council of exit packages includes compulsory and voluntary redundancy costs, pension contributions in respect of added years, ex-gratia payments and other departure costs.

The exit packages are classified into compulsory redundancies and other departures.

	Compulsory Redundancies						
Number of Exit Packages 2020-21	Cost to Council 2020-21	Cost Bandings	Number of Exit Packages 2021-22	Cost to Council 2021-22			
	£			£			
6	61,182	£0 - £19,999	4	30,435			
-	-	£20,000 - £39,999	-	-			
-	-	£40,000 - £59,999	-	-			
=	-	£60,000 - £79,999	=	-			
-	-	£80,000 - £99,999	-	-			
-	-	£100,000 - £149,999	2	213,353			
-	-	£150,000 - £199,999	=	-			
-	-	£200,000 - £249,999	1	225,687			
6	61,182	Total	7	469,475			

		Other Departures		
Number of Exit Packages 2020-21	Cost to Council 2020-21	Cost Bandings	Number of Exit Packages 2021-22	Cost to Council 2021-22
	£			£
32	194,458	£0 - £19,999	59	267,535
2	52,373	£20,000 - £39,999	8	226,484
-	-	£40,000 - £59,999	-	-
-	=	£60,000 - £79,999	1	61,594
1	81,038	£80,000 - £99,999		
-	-	£100,000 - £149,999	=	-
-	-	£150,000 - £199,999	-	-
-	-	£200,000 - £249,999	-	-
36	327,869	Total	68	555,613

The Exit Packages table excludes exit packages to senior officers, which, if applicable, are shown in a separate note above.

# Note 30. Capital Charges and the Repayment of External Loans

Services have been charged or credited within the Comprehensive Income and Expenditure Statement for:

- The depreciation and impairment of non-current assets.
- Expenditure on Revenue Expenditure Funded from Capital under Statute (REFCUS).

These charges are not required by statute and have therefore been removed when calculating the Movement on the General Fund Balance.

The MRP for 2021-22 is £24.647m, (2020-21 £24.435m).

These changes are reflected in a transfer to or from the Capital Adjustment Account and are included in the Movement in Reserves Statement.

# **Capital Expenditure Charged to General Fund Balance**

Authorities are allowed to finance capital expenditure through their revenue accounts. The expenditure of £2.942m in 2021-22 (£4.897m in 2020-21) is not shown in the Comprehensive Income and Expenditure Account but is charged to the General Fund and shown in the Movement in Reserves Statement.

# Profit or Loss on the Disposal of Assets and Investments

Profits or losses arising on the disposal of assets are charged to the Surplus or Deficit on Provision of Services in the Comprehensive Income and Expenditure Statement. The loss on disposal of £14.721 in 2021-22 is made up of £18.59m from the de-recognition of assets and £3.869m in capital receipts. There was a loss on disposal in 2021-22 largely because of schools

that were de-recognised from assets when they converted to Academies. The Council does not receive capital receipts when schools convert to academies.

Although generally accepted accounting practice requires any profit or loss to be charged to the Comprehensive Income and Expenditure Statement, there is no statutory duty on local authorities to make such a charge. The charge is therefore removed when calculating the movements on the General Fund balance for the year.

### Note 31. Leases

### Council as Lessee

#### **Finance Leases**

The Council has a number of assets which have been acquired under finance leases. These include IT equipment and photocopiers.

The assets acquired under these leases are carried as Property, Plant and Equipment in the Balance Sheet at the following net amounts:

31 March 2021	Finance Leases as Lessee	31 March 2022
£000		£000
-	Other land and Buildings	-
1,021	Vehicles, Plant, Furniture and Equipment	887
1,021	Total	887

The Council is committed to making minimum payments under these leases comprising settlement of the long-term liability for the interest in the property acquired by the Council and finance costs that will be payable by the Council in years while the liability remains outstanding. The minimum lease payments are made up of the following amounts:

	Finance Lease liabilities (net present value of minimum lease payments)	31 March 2022
£000		£000
271	Current	292
660	Non-current	503
24	Finance costs payable in future years	20
955	Total Minimum Lease Payments	815

The minimum lease payments will be payable over the following periods:

	Minimum Lea	se Payments	Finance Lease Liabilities		
	31 March 2021	31 March 2022	31 March 2021	31 March 2022	
	£000	£000	£000	£000	
Not later than one year Later than one year and not	282	301	271	292	
later than five years	673	514	660	503	
Later than five years	-	-	-	-	
	955	815	931	795	

The minimum lease payments do not include rents that are contingent on events taking place after the lease was entered into, such as adjustments following rent reviews.

No investment property held under operating leases have been classified as finance leases. However, should the economic reality be equivalent to the sale of investment property, these would be treated as finance leases.

### **Operating Leases**

The Council has entered into a number of operating leases for buildings, vehicles, photocopiers and office equipment. The amount charged under these arrangements in the Comprehensive Income and Expenditure Statement during 2021-22 was £1.527m (£1.571m 2020-21).

The future minimum lease payments due under non-cancellable leases in future years are:

31 March 2021		31 March 2022
£000		£000
752	Not later than one year	944
1,580	Later than one year and not later than five years	2,395
1,715	Later than five years	2,185
4,047	Total	5,524

#### Council as Lessor

### **Finance Leases**

The Council has leased out one property for 125 years. The Academy school buildings that are on a 125-year lease are also treated as a finance lease.

The Council has gross investments in the leases, made up of the minimum lease payments expected to be received over the remaining term and the residual value anticipated for the property when the lease comes to an end. The minimum lease payments comprise settlement of the long term debtor for the interest in the properties acquired by the lessees and finance income that will be earned by the Council in future years whilst the debtor remains outstanding. The gross investment is made up of the following amounts:

31 March 2021	Finance lease debtor (net present value of minimum lease payments)	31 March 2022
£000		£000
-	Current	-
210	Non-current	210
2,494	Unearned finance income	2,468
2,704	Gross Investment in the Lease	2,678

The gross investment in the lease and the minimum lease payments will be received over the following periods:

	Gross Investment in the Lease		Minimum L	ease Payments
	31 March 2021	31 March 2021 31 March 2022 3		31 March 2022
	£000	£000	£000	£000
Not later than one year	26	26	26	26
Later than one year and				
not later than five years	105	105	105	105
Later than five years	2,573	2,547	2,573	2,547
Total	2,704	2,678	2,704	2,678

The minimum lease payments do not include rents that are contingent on events taking place after the lease was entered into, such as adjustments following rent reviews.

The gross investment in the leases is assumed to be the same as the minimum lease payments because no residual value has been assumed for the lease at the end date.

# **Operating Leases**

The Council leases out property under operating leases for the following purposes:

- · for the provision of community services, such as sports facilities, tourism services and community centres.
- · for economic development purposes to provide suitable affordable accommodation for local businesses.
- one academy schools that are on short-term six year leases.

The future minimum lease payments receivable under non-cancellable leases in future years are:

31 March 2021		31 March 2022
£000		£000
2,918	Not later than one year	2,907
6,934	Later than one year and not later than five years	5,938
55,958	Later than five years	54,673
65,810	Total	63,518

The minimum lease payments receivable does not include rents that are contingent on events after the lease was entered into, such as income based on a percentage of income receipts. In 2021-22 £0.338m contingent rents were receivable by the Council (2020-21 £0.414m).

### Note 32. Private Finance Initiative (PFI)

### BSF Phase 1 - Provision of three schools

The Council has a 25 year PFI contract for the building and maintenance of three schools under the Building Schools for the Future Phase 1 programme. The contract commenced in August 2008 and expires in August 2033. The Council has rights under the contract to specify the activities undertaken at each school, and the contract specific minimum standards for the services to be provided by the contractor, with deductions from the fee payable being made if facilities are unavailable or performance is below the minimum standards. The contractor took on the obligation to construct and maintain the schools to a minimum acceptable condition and to procure and maintain the necessary plant and equipment needed to keep the schools operational. The buildings and any plant and equipment installed in them at the end of the contract will be transferred to the Council for nil consideration. The Council would have to pay the contractor substantial compensation if it terminated the contract early without due cause.

2020-21 £000	BSF Private Financing Initiative	2021-22 £000
	Charges to Net Cost of Services	
	Unitary Payments to the Contractor for services	
4,889	provided	5,525
4,889	Total charges to the revenue account  Net Operating Expenditure	5,525
5,836	Interest element of finance lease payments	5,294
	Movement in Reserves Statement	·
2,771	Capital element of finance lease	2,715
13,496	Total PFI charges	13,534
	Financed By	
9,005	Government PFI Revenue Grant	9,005
4,692	Education	4,777
-	Council and Schools contribution	-
13,697	Total Financing	13,782
201	Transfer to BSF PFI Reserve	248

The assets used to provide services at the schools are recognised on the Council's Balance Sheet, as regards one Community School. The other school assets are de-recognised because they are Academies. Movements in their value over the year are detailed in the analysis of the movement on the Property, Plant and Equipment balance in Note 9.

The Council makes an agreed payment each year which is increased each year by inflation and can be reduced if the contractor fails to meet availability and performance standards in any year but which is otherwise fixed. The figures used to calculate PFI balances include indexation. Estimated cash payments remaining to be made under the PFI contract at 31 March 2022 are as follows:

Year	Unitary Charge	Principal	Interest	Service charge and life cycle costs
	£000	£000	£000	£000
Within 1 year	12,671	2,850	4,676	5,145
2-5	52,148	15,256	16,850	20,042
6-10	68,760	27,385	13,555	27,820
11-15	19,793	10,065	1,853	7,875
Total	153,372	55,556	36,934	60,882

Although the payments made to the contractor are described as unitary payments, they have been calculated to compensate the contractor for the fair value of the services they provide, any capital expenditure incurred, and principal and interest payable to reduce the outstanding liability to the contractor. The liability outstanding to the contractor for capital expenditure incurred is as follows:

2020-21	Analysis of Outstanding Liability for BSF Phase 1	2021-22
£000		£000
61,042	Balance outstanding at 31 March	58,271
(2,771)	Payments during the year	(2,715)
58,271	Balance outstanding at year end	55,556

The closing value of assets held under the scheme at 31 March 2022 was £22.980m (£21.387m 31 March 2021) in respect of the BSF Phase 1 scheme.

The liabilities (i.e. the total principal repayments due over the life of the scheme) due on these assets at 31 March 2022 were £55.556m (£58.271m at 31 March 2021). The decrease of £2.715m is due to payments during the year.

### **BSF Phase 2**

The Council entered into a contract for Phase 2 of the BSF programme in September 2009, ending 2035-36. This relates to the building and maintenance of four mainstream Secondary Schools and three co-located Special Needs Secondary Schools. Two of the sites were completed during March 2011 and the other two handed over during 2011-12. The Council controls these assets and they will transfer to the Council at no cost at the end of the contract.

2020-21 £000	BSF Private Financing Initiative	2021-22 £000
	Charges to the Revenue Account	
10,943	Unitary Payments to the Contractor for services provided	11,020
10,943	Total charges to the revenue account	11,020
	Net Operating Expenditure	
11,266	Interest element of finance lease payments	11,244
	Statement of Movement on the General Fund Balance	·
4,970	Capital element of finance lease	5,219
27,179	Total PFI charges	27,483
,	Financed By	·
18,297	Government PFI Revenue Grant	18,297
9,026	Education	9,337
-	Council and Schools contribution	· -
27,323	Total Financing	27,634
144	Transfer to BSF PFI Reserve	151

The figures used to calculate PFI balances include indexation. Estimated cash payments remaining to be made under the PFI contract at 31 March are as follows:

Year	Unitary Charge	Principal	Interest	Service charge and life cycle costs
	£000	£000	£000	£000
Within 1 yr	26,428	5,650	10,868	9,910
2-5	108,584	22,774	41,455	44,355
6-10	142,742	32,186	46,137	64,419
11-15	119,075	29,899	30,964	58,212
Total	396,829	90,509	129,424	176,896

The liability outstanding to the contractor for capital expenditure incurred is as follows:

2020-21	Analysis of Outstanding Liability for BSF Phase 2	2021-22
£000		£000
100,698	Balance outstanding at 31 March	95,728
(4,970)	Payments during the year	(5,219)
=	Capital Expenditure incurred in the year	-
95,728	Balance outstanding at year end	90,509

The closing value of assets held under the scheme at 31 March 2022 was £34.779m (£24.307m 31 March 2021) in respect of the BSF Phase 2 scheme. The assets used to provide services at the schools are recognised on the Council's Balance Sheet, as regards one Foundation School and one Special School. The liabilities (i.e. the total principal repayments due over the life of the scheme) due on these assets at 31 March 2022 were £90.509m (£95.728m 31 March 2021).

The excess of the liabilities over the assets arises because schools are de-recognised when they convert from Community, Foundation or Special Schools to Academies on long leases or Trust status. This excess of the liabilities will be financed in future years by government grants. However, in line with accounting standards and the Code, these government grants are not shown on the Council's balance sheet.

The remaining BSF scheme assets total £57.759m, per Note 9 and the total liabilities are £146.065m. The total excess of liabilities over assets for BSF Phase 1 and 2 is £98.973m. This reduces the Council's Net Assets as shown in its Balance Sheet, by £98.973m.

### Note 33. Capital Expenditure and Financing

The Capital Financing Requirement is the outstanding nominal debt on historic borrowing to finance debt. The Capital Financing

Requirement is shown below:

2020-21		2021-22
£000		£000
	Capital Expenditure and Capital Financing Requirement	
710,701	Opening Capital Financing Requirement	698,763
	Capital investment	
49,288	Property, Plant and Equipment	72,361
33	Investment properties	251
10	Intangible Assets	92
14,575	Revenue Expenditure funded from Capital under statute	27,229
-	Capital Loans	5,152
	Sources of Finance	
(5,077)	Capital Receipts Applied	(4,163)
(41,434)	Government grants and other contributions	(62,848)
(4,897)	Sums set aside from revenue	(2,943)
(4,685)	Repayment of Principal on PFI and Other Finance Leases	(4,618)
(19,600)	MRP	(19,885)
-	Revision to estimated provision for amounts set aside	-
(151)	Payments of Principal on Long-Term Liabilities	(145)
698,763	Closing Capital Financing Requirement	709,246
	Explanation of movements in year	
	Increase/(decrease) in underlying need to borrow	
(12,035)	(unsupported by government financial assistance)	10,311
97	Assets acquired under finance leases	172
(11,938)	Increase/ (decrease) in Capital Financing Requirement	10,483

### Note 34. Revenue Expenditure Funded From Capital Under Statute (REFCUS)

These are payments of a capital nature where no non current asset is created, mainly grants made to individuals or organisations for capital purposes, such as improvement grants.

The cost of revenue expenditure funded from capital under statute (REFCUS) in the year was £27.229m (£14.575m in 2020-21). Grants of £24.267m funded this in year REFCUS expenditure (£12.363m in 2020-21), including £3.774m transferred from the Capital Grants Unapplied reserve (£5.453m in 2020-21).

### Note 35. Long Term Liabilities

The main liability is in respect of the actuarially calculated pension liability which is £364.333m lower at 31 March 2022 when compared to 31 March 2021.

Other significant liabilities are:

a) PFI principal repayments due over the remaining life of the BSF Phase 1 and Phase 2 contracts. The total outstanding PFI liability as at 31 March 2022 was £146.066m (£153.999m at 31 March 2021), of which £137.565m is a deferred liability and £8.501m a creditor in respect of the 2022-23 principal repayment.

b) former West Yorkshire Waste Management Joint Committee debt. This is managed on the Council's behalf by Wakefield Metropolitan District Council. The deferred liability outstanding at 31 March 2022 was £3.198m (£3.331m at 31 March 2021).

The other deferred liabilities relate to finance leases. These comprise property and equipment leased by the Council where the real substance of the transaction is that the assets are bought on credit.

2020-21	Long Term Liabilities	2021-22
£000		£000
1,234,891	Pension Liability	870,558
	PFI & Other Long term liabilities	
	BSF	
55,557	Phase 1	52,706
90,508	Phase 2	84,859
3,331	Waste Management Joint Committee Debt	3,198
1,139	Other	976
150,535	Total	141,739

The combined liability shown on the Balance Sheet of PFI Phase 1 and Phase 2 is £137.565m. As with all the Long-Term liabilities and current liabilities, the liability of £137.565m impacts on the Balance Sheet by reducing the net assets of the authority. However, this liability is matched with a government grant for Phase 1 of £9.005m and £18.297m for Phase 2, totaling £27.301m, see Note 41. The Phase 1 grant will be paid until 2033 and the Phase 2 grant will be paid until 2036.

#### Note 36. Deferred Income

There was no deferred income in 2021-22.

#### Note 37. Related Party Transactions

The Council is required to disclose material transactions with related parties – Bodies or individuals that have the potential to control or influence the Council or to be controlled or influenced by the Council. Disclosure of these transactions allows readers to assess the extent to which the Council might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely with the Council

Central Government has significant influence over the general operations of the Council. It is responsible for providing the statutory framework, within which the Council operates, provides the majority of its funding in the form of grants and prescribes the terms of many of the transactions that the Council has with other parties (e.g. Council tax bills, housing benefits). Grants received from government departments are set out in note 41.

Members of the Council have direct control over the Council's financial and operating policies. The total of members' allowances paid in 2021-22 is shown in note 28. Where members have an interest in companies or other organisations, details of such interests are recorded in the Register of Members' Interests which is open to public inspection.

During 2021-22, material transactions totaling approximately £1.384m (£1.566m 2020-21) net expenditure took place with such organisations. £1.582m (£1.690m 2020-21) of income from related parties (of which £0.229m (£0.124m 2020-21) is still outstanding) has been netted off £2.961m (£3.256m 2021-22) of expenditure on related parties (of which £0m (£0.052m 2020-21) is still outstanding).

Any contracts are entered into in full compliance with the Council's standing orders. Grants are made in line with proper consideration of declarations of interest. The members with declared interests take no part in any discussion or decision relating to grants made.

Members and Senior Officers (Chief Executive and Directors) are requested to complete a voluntary declaration of any transactions in which they have a pecuniary interest in accordance with section 117 of the Local Government Act 1972.

Other Public Bodies (subject to common control by central government) - The Council has a number of transactions with other public bodies including National Health Service bodies, other Councils and the Pension Fund. The following transactions are disclosed in other notes:

- Precepting authorities Comprehensive Income and Expenditure Statement and Collection Fund
- Pension Fund Notes 26 and 27
- Pooled Budgets Note 24

Also National Health Service bodies make payments towards the nursing costs of Council funded residents in care homes.

### **West Yorkshire Combined Authority**

The Council pays a transport levy towards the services provided by the West Yorkshire Combined Authority. The amount paid in 2021-22 was £22.9m (£22.2m in 2020-21).

The Leader of Bradford Council is a member of the Combined Authority. In addition to the transport levy, payments of £2.4m have been made to West Yorkshire Combined Authority in 2021-22 (£1.2m in 2020-21).

# **Bradford Council's Group**

The Council does not have any interests in outside companies or organisations which are sufficiently material to require the production of group accounts in 2021-22.

The Authority has a temporary controlling interest in Bradford Live (09083953). During 2021-22 expenditure has been incurred to the value of £5.154m with Bradford Live, of which £4.773m classed as a loan to Braford Live (loan made in 20-21 £500k, total loan made £5.273m).

# Note 38. External Audit Costs

The Council has incurred the following costs in relation to the audit of the Statement of Accounts:

2020-21* £000	External Audit Costs	2021-22 £000
188	External audit services	143
9	Certification of grant claims and returns	9
-	Fees for other services	=
197**	Total	152

<sup>\*</sup>The figures for 2020-21 have been amended to include fee variations agreed after the 2020-21 accounts were finalised.

<sup>\*\*</sup> The audit fee for the West Yorkshire Pension Fund have been removed from the 2020-21 year. These are disclosed separately in the Pension Fund disclosure notes.

# Note 39. Dedicated Schools Grant (DSG)

The Council is allocated the Dedicated Schools Grant (DSG) from the Department for Education (DfE) in support of expenditure relating to the schools budget. The DSG must be allocated between Individual Schools budget (ISB) and the Central School Budget expenditure, and over or underspends on the two elements need to be shown separately. The DSG has been made under sections 14 of the Education Act 2002 and has been spent in accordance with regulations made under sections 45A, 45AA, 47, 48 (1) and (2) and 138 (7) of, and paragraph 1 (7) (b) of Schedule 14 to the School Standards Framework Act 1998 (England).

Bradford was allocated £605.487m for financial year 2021-22, see the table below:

Dedicated Schools Grant	Total	Central Expenditure	Individual Schools Budget (ISB)	Total	Central Expenditure	Individual Schools Budget (ISB)
	2020-21	2020-21	2020-21	2021-22	2021-22	2021-22
	£000	£000	£000	£000	£000	£000
Final DSG before Academy Recoupment	564,427			605,487		
Academy Recoupment	(294,822)			(326,968)		
Total DSG after Academy Recoupment	269,605			278,519		
Plus DSG b/f from previous year	21,987			27,550		
DSG carry forward to following year agreed in advance	(20,685)			(24,458)		
Agreed Budget Distribution	270,907	26,837	244,070	281,611	26,132	255,479
In Year Adjustments	(759)	-	-	(1,043)	-	(1,043)
Final Budgeted Distribution	270,148	26,837	243,311	280,568	26,132	254,436
Less Actual ISB deployed to schools	238,288	-	238,288	243,527		243,527
Less Actual Central Expenditure	24,995	24,995	-	27,674	27,674	
Carry Forward	6,865	1,842	5,023	9,367	(1,542)	10,909
Carry Forward agreed in advance	20,685	2,784	17,901	24,458	4,626	19,832
Total Carry Forward	27,550	4,626	22,924	33,825	3,084	30,741

<sup>\*</sup> The DSG after Academy Recoupment of £278.519m is the same as is shown in the grants Note 41.

The school is in compliance against the School Finance England Regulations 2018.

### Note 40. Contingent Liabilities and Assets

This note summarises potential contingent losses in relation to certain outstanding matters which cannot be estimated accurately or considered sufficiently certain. Contingent liabilities are not accrued in the accounting statements.

### **Employment Tribunal**

An Employment Appeal Tribunal (November 2014) ruled that holiday pay should include non-guaranteed overtime which may have implications for the Council where our employees are required to work overtime as a regular part of their job. Any backdating of claims is limited. A limited liability may therefore arise, although it is not thought likely that the impact will be significant.

### **Municipal Mutual Insurance Limited (MMI Ltd)**

Prior to 1992, the Council's public liability and employers' liability insurance were supplied by MMI Ltd. In 1992 the company ceased to accept new business and entered a run off period. In 1994, a Scheme of Arrangement under the Companies Act 1985 was put in place, under which if the company became at risk of insolvency, it would be able to claw back the necessary percentage of the claims it had paid out since the commencement of the Scheme of Agreement. A court ruling in relation to employers' liability for occupational disease claims such as asbestosis has adversely affected the financial position of MMI Ltd to the extent that the Scheme of Arrangement has been triggered. The initial levy rate has been set at 15%. An additional levy was triggered for a further 10% on 1 April 2018, for which a provision was set aside as at 31 March 2019 (Please see Provisions, Note 19).

If the levy is increased to 100% this would generate a potential cost over £1 million but this is considered unlikely and would be over the long-term.

#### Search Fees

A group of Personal Search Companies sought to claim refunds of fees paid to the Council to access land charges data. The Council agreed to settle and some costs have been previously settled. It is possible that additional claimants may come forward to submit claims for refunds. An amount of £0.1m is set aside within provisions for refund of search fees (Please also see Provisions, Note 19).

Given that most claims have come forward, the cost of any further claims is expected to be minimal.

### **Compensation Claim**

There is a potential contingent liability for schools that convert to an academy where there are historic school deficit balances and whose responsibility they will be if a school converts to an academy. There are a number of schools that could be affected although the Council will look to actions to reduce its exposure to financial loss.

In the event that the Council has to fund historic deficits, relating to a school which has recently converted to an Academy, there may be a future cost potentially circa £5.9million: however, the Council is seeking central government funding for this.

# **Compulsory Purchase Order**

The Council is currently in the process of a compulsory land purchase; this may result in a Tribunal referral for determination, the Tribunal will determine the quantum.

### Note 41. Grant Income

The revenue government grants shown in the tables below represent the accrued amount received by the Council.

The Council credited the following grants, and donations, to the Comprehensive Income and Expenditure Statement in 2021-22:

Grant Income	2020-21	2021-22
	£000	£000
Credited to Net cost of Services		
Dedicated Schools Grant (DSG)	269,605	278,519
Rent Allowance Subsidy	117,954	110,731
Public Health	42,298	42,675
Pupil Premium	13,636	13,350
PFI Revenue Support	27,301	27,301
Education and Schools	29,473	28,190
Social Care Support	15,185	17,894
NHS Adult Social Care	22,701	22,701
Revenue Expenditure Funded from Capital under Statute (REFCUS)	6,910	20,493
Other Grants under £5,000k	20,973	34,421
Total	566,035	596,275
Covid 19 Grants Credited to Net Cost of Services		
Contain Outbreak Management Fund (including Test and Trace)	17,742	4,780
Infection Control Grant	10,043	5,305
Household Support Fund	-	5,694
Discretionary Business Grants	6,842	-
Additional Restrictions Grant	1,882	14,347
Other Covid Grants Under £5,000k	16,991	17,198
Total Covid Grants credited to Cost of Service	53,500	47,324
Total Grants Credited to Cost of Service	619,535	643,599
Credited to Taxation and Non Specific Grant Income		
Revenue Support Grant	34,609	34,800
Top Up Grant	69,269	69,259
New Homes Bonus Grant	4,118	2,046
Small Business Rates and other Section 31 grants including National	27,853	28,716
Levy surplus	21,000	20,710
Local Services Support Grant	852	1,658
Covid 19 Support Grant	38,563	18,524
Income Compensation Scheme	12,973	2,848
75% Tax Income Guarantee Compensation	7,142	-
Council Tax Hardship Grant	5,852	6,124
Total	201,231	163,975

Covid Business Grants where Council Acts as Agent	2020-21	2021-22
	£000	£000
Government Grants for Businesses	125,027	-
Local Restriction Tier 2 (closed) and Closed Addendum	25,645	1,674
Closed Business Lockdown Payments	18,848	1,394
Restart	-	27,139
Other Covid Grants under £5,000k	4,354	8,435
Total Covid Grants where Council is Agent	173,874	38,642

The Council has acted as an agent for a number of Business Grants during 2021-22, these are not included in the Comprehensive Income and Expenditure.

# **Capital Grants Receipts in Advance**

The Council has received a number of grants and contributions that have yet to be recognised as income as they have conditions attached to them that will require the monies or property to be returned to the giver. The balances shown below are included in the Balance Sheet in Capital Grants Receipts in Advance under Long Term Liabilities and the amounts at year end are as follows:

	2020-21 £000	_
Capital Grants Receipts in Advance		
Developer's contributions	15,571	13,904
Total (See Balance Sheet)	15,571	13,904

### Note 42. Impairment Losses

The Code requires disclosure by class of assets of the amounts for impairment losses and impairment reversals. The Code distinguishes between impairment loss – which represents the consumption of economic benefit specific to an asset – and revaluation loss – which represent a general decrease in prices. These disclosures are consolidated in Note 9 and Note 13.

The Council has recognised an impairment loss of £0.122m on Property, Plant and Equipment in the Surplus or Deficit on the Provision of Services. This relates to properties purchased as part of a Highways junction improvement scheme with the plan to demolish them to allow the construction of a new road.

#### Note 43. Financial Instruments

A financial instrument is a contract that gives rise to a financial asset of one entity and a financial liability of another. The term covers both financial liabilities and financial assets and includes the borrowing, lending, soft loans, financial guarantees and bank deposits of the Council. Non exchange transactions such as those relating to taxes and government grants, do not give rise to financial instruments.

The Council's assets and liabilities are carried at amortised cost – a measure reflecting transactional cashflows. This note gives details about the Council's financial assets and liabilities, and the fair value of these at the balance sheet date (this can differ from the carrying amount).

The following categories of financial instrument are carried on the Balance Sheet:

	Long-term		Current	
	31 March 2021	31 March 2022	31 March 2021	31 March 2022
	£000	£000	£000	£000
Financial assets at amortised costs				
Investments (Principal amount)	-	-	80,000	88,512
Investments Accrued Interest	-	-	6	121
Cash & Cash Equivalents	-	-	82,570	119,094
Equity Investments	1	1	-	-
Debtors – loans and receivables	1,897	6,992	292	244
Non Financial Assets	-	-	40,520	45,492
Total Assets	1,898	6,993	203,388	253,463
Financial liabilities at amortised cost				
Loans (Principal amount)	334,339	323,166	9,070	59,299
Accrued Interest	-	-	3,453	3,349
PFI and Finance Lease Liabilities	146,725	138,068	8,205	8,793
Non Financial Liabilities	-	ı	45,968	42,687
Total Liabilities	481,064	461,234	66,696	114,128

Under accounting requirements, the carrying value of the financial instrument value is shown in the balance sheet which includes the principal amount borrowed or lent and further adjustments for breakage costs or stepped interest loans (measured by an effective interest rate calculation) including accrued interest. Accrued interest is shown separately in current assets/liabilities where the payments/receipts are due within one year. The effective interest rate is effectively accrued interest receivable under the instrument, adjusted for the amortisation of any premiums or discounts reflected in the purchase price.

# Fair value of Financial Instruments

Financial liabilities and financial assets represented by loans and receivables and long term debtors and creditors are carried in the Balance Sheet at amortised cost. Their fair value can be assessed by calculating the net present value of the cash flows that take place over the remaining life of the instruments (all Level 2) which provides an estimate of the value of payments in the future in today's terms. The calculations have been made using the following assumptions:

- For loans from the Public Works Loan Board (PWLB) new borrowing rates from the PWLB have been applied to
  provide the fair value under PWLB debt redemption procedures. We have assessed the cost of taking a new loan at
  PWLB new loan rates applicable to existing loans on Balance Sheet date (which could be viewed as a proxy for transfer
  value).
- For Lender's Option Borrower's Option" (LOBO) loans prevailing market rates have been applied to provide the fair value under PWLB debt redemption procedures.
- For loans receivable prevailing benchmark market rates have been used to provide the fair value.
- No early repayment or impairment is recognised.
- Where an instrument has a maturity of less than 12 months or is a trade or other receivable the fair value is taken to be the carrying amount or the billed amount.
- The fair value of trade and other receivables is taken to be the invoiced or billed amount.

The fair values calculated are as follows:

2020-21 Carrying amount	2020-21 Fair value		Fair value of liabilities carried at amortised cost at 31 March	Fair value level	2021-22 Carrying amount	2021-22 Fair value
£000	£000				£000	£000
297,849	387,966	2	PWLB Loans	2	292,336	350,910
37,792	57,362	2	LOBO's	2	37,775	52,338
400	400	2	Other loans	2	5,594	5,594
3,453	3,453		Short term borrowing		40,349	40,349
3,413	3,413		Cash overdrawn		5,949	5,949
3,616	5,499	2	Other local authorities re joint services	2	3,471	5,033
339	339		Other		340	340
154,930	154,930	2	PFI and finance lease liabilities	2	146,861	146,861
45,968	45,968		Financial liabilities at contracted amounts		42,687	42,687
547,760	659,330		Total Liabilities		575,362	650,061

The fair value of liabilities is greater than the carrying amount because the Council's portfolio of loans includes a number of fixed rate loans where the interest rate payable is higher than the rates available for similar loans at the Balance Sheet date. This shows a notional future loss (based on economic conditions at 31 March 2022) arising from a commitment to pay interest to lenders above current market rates.

The Council has determined that for PFI scheme and finance lease liabilities the carrying value represents the best estimate of fair value, as the carrying value is based on the effective interest rate of the contract, which reflects the unique risks associated with the contract.

An alternative valuation technique for PWLB loans is where the value is calculated to be equivalent to the cost of the early repayment of outstanding PWLB debt. But if the Council were to seek to repay the loans to the PWLB, the PWLB would raise a penalty charge for early redemption in addition to charging an additional premium for the additional interest that will not now be paid. If this method of valuation had been used in 2021-22 the fair value would be calculated as £399.880m.

The above fair values are judged to be level 2 in the fair value hierarchy, using significant observable inputs. There were no transfers between input levels in the fair value hierarchy during the year.

Financial Assets that mature within one year are carried at cost as this is a fair approximation of their value, as reflected in the following table.

2020-21 Carrying amount	2020-21 Fair value	Fair value level	Fair value of assets carried at amortised cost at 31 March	Fair value level	2021-22 Carrying amount	2021-22 Fair value
£000	£000				£000	£000
80,005	80,005		Investments		88,614	88,614
82,571	82,571		Cash and cash equivalents		119,113	119,113
1	1		Equity Investments – Integrated Bradford Local Education Partnership (LEP) Ltd		1	1
2,189	2,189	2	Debtors – loans and receivables	2	7,236	7,236
40,520	40,520		Non financial assets		45,492	45,492
205,286	205,286		Total Assets		260,456	260,456

Short term debtors and creditors are carried at cost as this is a fair approximation of their value.

#### Gains and losses on financial instruments

The gains and losses recognised in the Comprehensive Income and Expenditure Statement in relation to financial instruments are made up as follows.

2020-21	Recognised gains and losses	2021-22
£000		£000
	Financial assets: measured at amortised cost	
(1,011)	Interest revenue	(601)
(1,011)	Total interest revenue in surplus or deficit on the provision of services	(601)
	Financial Liabilities measured at amortised cost	
16,511	Interest expense	16,327
17,119	Interest expense on PFI and Finance Leases	16,551
33,630	Total interest expense in surplus or deficit on the provision of services	32,878

### Nature and extent of risks arising from financial instruments

The Council's activities expose it to a variety of financial risks:

- a. Credit Risk the possibility that other parties might fail to pay amounts due to the Council.
- b. Liquidity Risk the possibility that the Council might not have funds available to meet its commitments to make payments.
- c. Market Risk the possibility that financial loss might arise for the Council as a result of changes in such measures as interest rate movement.

### Overall procedures for managing risks

The Council's management of treasury risks actively works to minimise the Council's exposure to the unpredictability of financial markets and to protect the financial resources available to fund services. In July 2003 the Council fully adopted the CIPFA Code of Treasury Management Practices. Each year the Director of Finance presents to the Governance and Audit Committee an Annual Treasury Management Report which covers the Council's current treasury position, borrowing and investment strategies and performance and debt rescheduling.

The annual Treasury Management Strategy which incorporates prudential indicators was reviewed by Governance & Audit Committee on 25 March 2021 and approved by Council on 25 January 2022 and is available on the Council's website. Actual performance is also reported after each year.

### a. Credit Risk

Credit risk arises from deposits with banks and financial institutions, as well as credit exposures to the Council's customers.

It is the policy of the Council set out in the Annual Investment Strategy to place deposits only with a limited number of banks and building societies whose credit rating is independently assessed as sufficiently secure by the Council's treasury advisers and to restrict lending to a prudent maximum amount for each institution. The Council also has a policy of limiting deposits and maturities with banks and building societies depending on an institution's (such as Moody's or Fitch's) credit rating.

The credit criteria in respect of financial assets held by the Council are as detailed below.

### **Investment limits**

The financial investment limits with the Government, Banks or Building Societies are linked to Moody's, Fitch and Standard and Poors (S&P) ratings, as follows: -

- 1. The Government through debt management office including deposits, treasury bills and bank government guarantee certificate of deposits Maximum Investment with any one counter party no limit.
- 2. Local Authorities: Maximum Investment with any one counter party £20 million.
- 3. Money Market funds including government funds with a Moody's, S&P or Fitch rating of AA: Maximum Investment with any one counter party £20 million.
- Any other Bank or Building Society with credit criteria of Moody's rating Aa3 or better (Fitch AA-if not available), Fitch short term rating of at least F1 and a S&P short term rating of A1 or better: Maximum Investment with any one counter party – £30million.
- 5. Any Bank or Building Society with credit criteria of Moody's rating A1 or better, (Fitch A+ if not available), Fitch short term of at least F1 and a S & P short term rating of A-1 or better: Maximum Investment with any one counter party £20million.
- 6. Lower limit with any bank or building society with at least one of the following; Moody rating of A3 or better, Fitch rating of at least F1, S&P rating of A-1 or better. Maximum Investment with any one counter party £7million.
- 7. National Westminster Bank £20m.

The full Investment Strategy for 2021-22 was approved by Governance & Audit Committee on 25 March 2021 Full Council on 25 January 2022 and is available on the Council's website.

# Amounts arising from expected credit losses

The Council's debtors incorporate a credit loss provision. The credit loss provision is estimated on the basis of the age of the outstanding debt, combined with specific knowledge indicating the likelihood of payment. The Council defines default, as when a debtor is unable to pay or looks likely to be unable to pay in the future. Credit losses have been estimated on a case by case basis.

# **City of Bradford Metropolitan District Council**

However, in the initial review, debtors are assessed by age. Credit-impaired financial assets are reviewed against a prospective credit loss model.

At the year end the Council held investments of £186.233m, made up of £88.614m Investments and £97.619m Cash and Cash Equivalents. The Council's maximum exposure to credit risk in relation to the above balances cannot be assessed generally as the risk of any institution failing to make interest payments or repay the principal sum will be specific to each individual institution.

A risk of irrecoverability applies to all of the Council's deposits, but there was no evidence at 31 March 2022 that any losses were likely to crystallise. The Council has not suffered any historical experience of default on any deposits with financial institutions, and does not expect to suffer any defaults on any of its existing deposits and therefore there is no requirement for any impairment of financial assets to be made.

We have assessed the Council's short term and long term investments and concluded that the expected credit loss is not material therefore no allowance has been made. For Investments the historical experience of default is 0.005% and the estimated expected credit loss £8,697, see table below.

	31 March 2022	Lowest Credit	Historical	Estimated
	Principal	rating	experience of	maximum
			default	exposure to
	£000			default
				£000
Toronto Dominion Bank	5,002	AA-	0.004%	0.176
Skandinaviska Enskilda Banken AB	10,000	A+	0.009%	0.897
Cooperatieve Rabobank U.A	5,000	A+	0.016%	0.802
UBS Bank	5,000	A+	0.025%	1.244
Societe Generale	5,000	A-	0.019%	0.935
Santander	3,000	Α	0.007%	0.212
Nordea Bank	10,000	AA-	0.014%	1.393
DBS Bank	3,000	AA-	0.004%	0.105
Toronto Dominion Bank	10,010	AA-	0.003%	0.251
Skandinaviska Enskilda Banken AB	10,000	A+	0.010%	0.985
Societe Generale	4,999	A-	0.014%	0.701
National Australia Bank	7,506	A+	0.011%	0.806
Standard Chartered	5,002	A+	0.004%	0.177
Treasury Bill	4,993	AA-	0.003%	-
Handlesbanken	20,000	AA-	0.000%	0.013
HSBC MMF	19,700	AAAm	0.000%	-
Black Rock MMF	20,000	AAAm	0.000%	-
Federated Investos MMF	17,900	AAAm	0.000%	-
LGIM MMF	20,000	AAAm	0.000%	-
Investments Principals	186,112	-	-	8.697

No credit limits were exceeded during the reporting period and the Council does not expect any losses from non-performance by any of its counterparties in relation to deposits and bonds.

The Council holds a number of long-term debtors totalling £6.992m as at 31 March 2022. When undertaking any long-term loans, the Council follows a full due diligence process. Having assessed the Council's exposure to credit risk on the long-term debtors as at 31 March 2022, there was no evidence that the entities were unable to meet their commitments on their existing loan structures.

The Council does not generally allow credit for customers and trade debts are actively pursued but some of the current balance is past its due date. Customers for goods and services are assessed, dependent on materiality, taking into account their financial position, past experience and other factors as appropriate. An impairment charge has been included in the accounts, to take account of the risk of non-payment (see Note 17). The exposure to default has been assessed and is reflected in an impairment charge of £10.438m. As at 31 March 2022, the Council had a balance owing from its customers (mainly service and rent) of £45.492m (£40.520m 31 March 2021).

## b. Liquidity Risk

The Council manages its liquidity position through the risk management procedures above and through a comprehensive cash flow management system. This seeks to ensure cash is available when needed.

If unexpected movements occur, the Council has ready access to a facility to borrow from the Public Works Loans Board to cover any day to day cash flow need. The Council is also required to provide a balanced budget through the Local Government Finance Act 1992, which ensures sufficient monies are raised to cover annual expenditure. There is therefore no significant risk that the Council will be unable to raise finance to meet its commitments under financial instruments.

The Council maintains a significant debt and investment portfolio. Whilst the cash flow procedures above are considered against the refinancing risk procedures, longer term risk to the Council relates to managing the exposure to replacing financial instruments as they mature.

The Council has safeguards in place to ensure that a significant proportion of its borrowing does not mature for repayment at any one time in the future to reduce the financial impact of re-borrowing at a time of unfavorable interest rates. The Council's policy is to ensure that not more than 20% of loans are due to mature within any financial year and 40% within any rolling five-year period through a combination of prudent planning of new loans taken out and, where it is economic to do so, making early repayments.

The following is an analysis of amounts owed to lenders at the year-end.

31 March 2021	Total Borrowing	31 March 2022
£000		£000
	Source of loan and interest rate range:	
297,849	Public Works Loan Board (3.7% to 10%)	292,336
37,793	Commercial Banks (3.2% to 4.5%)	37,775
400	Other	42,594
336,042	Total	372,705
	Analysis of loans:	
5,511	Maturing in less than 1year	53,211
5,511	Total Short Term Borrowing	53,211
	Long Term Borrowing	
38,204	Maturing in 2 - 5 years	43,732
59,296	Maturing in 5 - 10 years	54,697
56,938	Maturing in 10 - 15 years	44,991
176,093	Maturing in more than 15 years	176,074
330,531	Total Long Term Borrowing	319,494
336,042	Total Borrowing	372,705

The above analysis assumes that Lender Option, Borrower Option loans (LOBOs) run their full term.

The total borrowing shown on the Balance Sheet, of £376.054m, calculated by adding together short term (£56.560m) and long-term borrowing (£319.494m), includes accrued interest of £3.349m, per accounting regulations. Accrued interest is not included in the above table.

All trade and other payables are due to be paid in less than one year and are not shown in the table above. Further details for short term creditors can be found in Note 17.

#### c. Market Risk

## Interest rate risk

The Council is exposed to interest rate movements on its borrowings and investments.

The current interest rate risk for the Council is summarised below:

- Borrowings at variable rates the interest expense charged to the Surplus or Deficit on the Provision of Services will rise
- Borrowings at fixed rates the fair value of the borrowing will fall (no impact on the revenue balances);
- Investments at variable rates the interest income credited to the Surplus or Deficit on the Provision of Services will
  rise.
- Investments at fixed rates the fair value of the assets will fall (no impact on revenue balances).

Borrowings are not carried at fair value on the Balance Sheet, so nominal gains and losses on fixed rate borrowings would not impact on the Surplus or Deficit on the Provision of Services or Other Comprehensive Income and Expenditure. However, changes in interest payable and receivable on variable rate borrowings and investments will be posted to the Surplus or Deficit on the Provision of Services and affect the General Fund Balance.

The Council has a number of strategies for managing interest rate risk. During periods of falling interest rates, and where economic circumstances make it favorable, fixed rate loans will be repaid early to limit exposure to losses. The risk of loss is ameliorated by the fact that a proportion of government grant payable on financing costs will normally move with prevailing interest rates or the Council's cost of borrowing and provide compensation for a proportion of any higher costs.

According to this investment strategy, if interest rates had been 1% higher at 31 March 2022 with all other variables held constant, the financial effect would be:

31 March 2021 £000	Effect of 1% increase in interest rates	31 March 2022 £000
-	Increase in interest payable on variable rate borrowings	-
(1,085)	Increase in interest receivable on variable rate investments	(1,250)
-	Increase in government grant receivable for financing costs	-
(1,085)	Impact on Surplus or Deficit on the Provision of	(1,250)

The impact of a 1% fall in interest rates would be as above but with the movements being reversed. The Council does not have any borrowings at a variable rate.

The treasury management team has an active strategy for assessing interest rate exposure that feeds into the setting of the annual budget and which is used to update the budget quarterly during the year. This allows any adverse changes to be accommodated. The analysis will also advise whether new borrowing taken out is fixed or variable.

## **Price Risk**

The Council does not generally invest in equity shares and does not have any material shareholdings in joint ventures or local companies, and it is not therefore subject to price risk.

## Foreign Exchange Risk

The Council does not have any financial assets or liabilities denominated in foreign currencies, and therefore had no exposure to loss arising from movements in exchange rates.

## Note 44. Trust Funds and Custodial Money

The Director of Finance acts as treasurer to 21 funds (inclusive of 19 sole trustee charities), held in trust for such purposes as maintenance grants, travel scholarships and book prizes, or for the benefit and care of particular client groups. The fund balances are invested in managed funds, local authority bonds and gilt edged securities and deposit accounts.

£20,524 (£20,904 at 31 March 2021) is also held on behalf of clients who are in residential care.

The assets shown below are not owned by the Council and are not included in the Balance Sheet.

Balance at 31st March 2021	Analysis of Trust Funds and Custodial Money Balances	Expenditure 2021-22	Income 2021-22	Balance at 31st March 2022
£000		£000	£000	£000
671	The Charles Semon Educational Foundation	-	14	685
930	Bradford area	-	17	947
540	Keighley area	-	21	561
4	Housing charities	-	-	4
354	Charities for the Blind	-	6	360
2,499	Total Trust Funds and Custodial Money Balances	-	58	2,557

For those Trust Funds where the Council acts as sole trustee and which at 31 March 2022 had net assets of over £50,000, further details regarding the purpose of the charity and its financial performance are set out below.

Trust Fund and Charity Registration Number	Purpose	Net increase / (decrease) in funds in 2021-22	Balance at 31st March 2022
		£000	£000
The Charles Semon Educational Foundation (1095912)	Promote the education of young people under 25 in need of financial assistance	14	685
King George's Field Keighley (514349)	Provision and maintenance of King George's Field recreation ground	20	546
Royd House Trust Wilsden (700025)	Maintenance of Royd House and grounds for the perpetual use by the public	5	162
The Peel Park (523509)	Maintenance, repair and improvement of land and buildings belonging to the charity	2	227
Little Moor Park (otherwise Foster Park) Queensbury (519426)	Maintenance of Public Park & Recreation Ground	1	69
Bingley Educational Trust	Sale of Land - Money used for Grant Giving	-	224
Wibsey Park Lodge	Sale of Land - Money used for Grant Giving	-	120

There is a statutory requirement for billing authorities to maintain a separate Collection Fund showing the transactions in respect of Council Tax and Business Rates and the way in which these have been distributed to preceptors, central government and the General Fund. Although a separate Income and Expenditure Account is required, the Collection Fund balances are consolidated into the Council's Balance Sheet. Any deficit or surplus at year end that is due to or from the Council is included in the Comprehensive Income and Expenditure Statement. Any amounts due to or from precepting bodies at year- end will not be included in the Collection Fund, but will be included in debtors and/or creditors as appropriate.

2020-21 £000	2020-21 £000	2020-21 £000	Collection Fund Statement	2021-22 £000	2021-22 £000	2021-22 £000	
Council Tax	Business	Total		Council Tax	Business Rates	Total	Note
Tax	Rates		Income	Tax	Rates		
(246,113)	_	(246,113)	Due from Council Tax payers	(261,603)	-	(261,603)	Note 1
-	_	-	Due in respect of Council Tax benefits	-	-	-	
-	(76,875)	(76,875)	Due from Business Rate payers	-	(108,658)	(108,658)	Note 2
(246,113)	(76,875)	(322,988)	Total Income	(261,603)	(108,658)	(370,261)	
			Expenditure				
			Precepts:				
208,656	-	208,656	Bradford Council	215,518	-	215,518	
9,508	-	9,508	West Yorkshire Fire and Rescue Authority	9,540	-	9,540	
28,333	-	28,333	Police & Crime Commissioner for West Yorkshire	30,001	-	30,001	
			Business Rates:				
-	66,922	66,922	Payment to Central Government	-	66,622	66,622	
-	1,338	1,338	Payment to West Yorkshire Fire and Rescue Authority	-	1,332	1,332	
-	65,584	65,584	Payment to Bradford Council	-	65,289	65,289	
-	720	720	Costs of Collection	-	717	717	
-	-	-	Disregarded Amounts - Designated Growth Area	-	152	152	
-	2,740	2,740	Transitional Protection Payments	-	645	645	
-	-	-	Write-offs of Uncollectable Amounts	-	-	-	
-	-	-	Settlement of Appeals	-	(7,195)	(7,195)	
5,567	5,133	10,700	Contribution to / from (-) Provision for Losses on Bad & Doubtful Debts	5,424	1,382	6,806	Note 3
-	(5,710)	(5,710)	Contribution to / from (-) Provision for Losses on Appeals	-	6,102	6,102	Note 4
			Distribution of Collection Fund Surplus/Repayment of Deficit:				
980	768	1,748	Bradford Council	(3,266)	(23,663)	(26,929)	
46	9	55	West Yorkshire Fire and Rescue Authority	(151)	(488)	(639)	
133	-	133	Police & Crime Commissioner for West Yorkshire	(449)	-	(449)	
-	79	79	Central Government	-	(24,544)	(24,544)	
253,223	137,583	390,807	Total Expenditure	256,617	86,351	342,968	
7,110	60,708	67,818	Net movement (surplus (-)/deficit) in the fund balance	(4,986)	(22,307)	(27,293)	Note 5
			Movements on the Collection Fund Balance				
155	(1,644)	(1,489)	Balance at beginning of year	7,265	59,064	66,329	
6,007	29,747	35,754	Bradford's share of surplus (-) /deficit for the year	(4,197)	(10,930)	(15,127)	Note 5
1,103	607	1,710	Preceptors' share of surplus (-) /deficit for the year	(789)	(223)	(1,012)	Note 5
-	30,354	30,354	Central Government's share of surplus (-) /deficit for the year	-	(11,153)	(11,153)	Note 5
7,265	59,064	66,329	Balance at end of year	2,279	36,758	39,038	
			Allocated to:				
6,138	28,744	34,882	Bradford Council	1,941	18,012	19,952	
286	591	877	West Yorkshire Fire and Rescue Authority	88	368	455	
841	-	841	Police & Crime Commissioner for West Yorkshire	251	-	251	
-	29,729	29,729	Central Government	-	18,379	18,379	
7,265	59,063	66,330	Total Allocation	2,279	36,758	39,038	

#### Note 1. Council Tax

Council Tax income is generated from charges raised on residential properties. Each domestic property is assigned to one of eight bands A-H depending on its capital value. (Band A\* properties are properties in Band A entitled to disabled relief reduction). Properties in higher bands are charged more, although the charges may be reduced by Council Tax reduction and/or single occupier discount.

Properties in the middle band, D, were charged at £ 1,777.57 in 2021-22 (£1,690.01 in 2020-21) to cover the precepts of the three authorities. This figure does not include any precepts for Parish/Town Councils.

The Council Tax base for 2021-22 was 142,000 (144,351 in 2020-21). The tax base for 2021-22 was approved at the Executive meeting on 5th January 2021 and was calculated as follows:

2020-21 Band D Equivalent		Band	2021-22 Number of chargeable dwellings	Multiplier	2021-22 Band D Equivalent
62		A*	84	5/9	47
42,133		Α	53,438	6/9	40,632
29,196		В	32,658	7/9	28,915
30,702		С	32,745	8/9	30,528
16,349		D	17,075	9/9	16,485
14,421		Е	14,797	11/9	14,571
8,112		F	8,236	13/9	8,147
5,823		G	5,873	15/9	5,825
498		Н	512	18/9	492
147,297	Total Band D equivalent				145,642
-2946	Adjustment for estimated los	sses on colle	ection		-3,642
144,351	Council Tax Base				142,000

#### Note 2. Business Rates (National Non-Domestic Rates)

The Council collects business rates on behalf of central government for its area. The rate in the pound of rateable value is set by central government. There are two multipliers: the small business non-domestic rating multiplier of 49.9p (49.9p in 2020-21) is applicable to those that qualify for the small business relief; and the non-domestic rating multiplier of 51.2p (51.2p in 2020-21) includes the supplement to pay for small business relief.

In 2013-14, the local government finance regime was revised with the introduction of the retained business rates scheme. The main aim of the scheme is to give Councils a greater incentive to grow businesses in the district. It does, however, also increase the financial risk due to non-collection and the volatility of the Business Rates tax base. The scheme allows the Council to retain 49% of the total Business Rates received. Of the remainder, 50% is paid to Central Government and 1% is paid to West Yorkshire Fire and Rescue Authority (WYFRA).

The business rates shares payable for 2021-22 were estimated before the start of the financial year as £1.332m to WYFRA and £65.289m to Bradford Council. These sums have been paid in 2021-22 and charged to the Collection Fund in year.

The total income from business rate payers collected in 2021-222 was £108.658m (£76.875m in 2020-21). This sum includes £0.645mm (£2.740m in 2020-21) of transitional protection payments from ratepayers, which under Government regulation should have a neutral impact on the business rate retention scheme. This sum has to be repaid to Central Government.

The business rates income, after reliefs and provisions, was based on a total rateable value for the Council's area of £384,505,038 for 2021-22 (£386,188,439 for 2020-21).

#### Note 3. Provision for Council Tax and Business Bad Debts

In 2021-22, the provision for Council Tax bad debts decreased from £16.458m to £15.761m. The net movement of £0.697m represents amounts charged against the provision of £6.120m for outstanding arrears that are irrecoverable and an increase in the provision during the year of £5.424m. Of the final balance, 84.5% is to cover Council Tax owed to the Council. The remaining 15.5% is to cover amounts owed to major preceptors.

In 2021-22, the provision for Business Rates bad debts increased from £7.173m to £7.838m. The net movement of £0.665m represents amounts charged against the provision of £0.718m for outstanding arrears that are irrecoverable and an increase in the provision during the year of £1.382m. Of the final balance, 49% is to cover Council Tax owed to the Council. The remaining 51% is to cover amounts owed to West Yorkshire Fire and Rescue Authority (1%) and amounts owed to Central Government (50%).

#### Note 4. Provision for Losses on Appeals

Within the 2021-22 Business Rate Pool, the Council shares 49% of the risks and rewards of the income from Business Rates. The Council could potentially receive a shortfall in income from changes in the valuations of commercial premises, following appeals to the Valuation Agency. In 2021-22, the full provision for losses on outstanding appeals was decreased by £1.093m, from £16.554m at 31 March 2021 to £15.460m at 31 March 2022. The Council's 49% share of the £15.460m provision was £7.575m.

## Note 5. Collection Fund Balance

In line with proper accounting practice for Council Tax, Business Rates and the Collection Fund, any surplus or deficit in year must be allocated in year to the Council and the preceptors in the required proportions. However, in order to reflect the fact that the Council is not allowed by statutory legislation to either fund deficits or use surpluses in year, the distribution is offset by an entry to the Collection Fund Adjustment Account in the Council's Balance Sheet. This change does not therefore affect the statutory position, which is that any surplus or deficit on the Collection Fund must be used as an adjustment to the Council Tax and Business Rates in future years.

An overall deficit of £39.038m arose in 2021-22 (£66.329m deficit in 2020-21), of which the Council's share was a deficit of £19.952m (£34.882m deficit in 2020-21) and the preceptors share a deficit of £19.085m (£31.447m deficit in 2020-21). The exceptional deficit on the Collection Fund is discussed in more detail in Note 6 below.

#### Note 6. Collection Fund Deficit

The significant Collection Fund deficit for 2021/22 has arisen largely in relation to reductions being applied to business rates. These reductions reflected central government's support for businesses, in response to the COVID-19 pandemic, by awarding expanded retail discounts and nursery and newspaper reliefs, meaning that less rates were billed and therefore collectable in 2021/22. The business rates reductions are funded by central government through Section 31 Grants. The compensation is not included in the Collection Fund but is reimbursed to the Council through the General Fund account.

## Note 7. Leeds City Region Pooling Arrangement

The Council is a Member of the Leeds City Region Pool along with the other four West Yorkshire Authorities, Harrogate and York. Under the terms of the pooling arrangement, during the year, each authority will receive exactly the same funding as they would have if treated individually. The distribution of any levy income is retained in the region as opposed to being paid over to the Government.

# Independent auditor's report to the members of City of Bradford Metropolitan Council

## Report on the audit of the financial statements

#### Opinion on the financial statements of West Yorkshire Pension Fund

We have audited the financial statements of West Yorkshire Pension Fund ('the Pension Fund') for the year ended 31 March 2022, which comprise the Fund Account, the Net Assets Statement and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22.

In our opinion the financial statements:

- give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2022, and the amount and disposition of the Pension Fund's assets and liabilities as at 31 March 2022; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22.

#### **Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities section of our report. We are independent of the Council, as administering authority for the Pension Fund, in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Director of Finance & IT's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Pension Fund's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Director of Finance & IT with respect to going concern are described in the relevant sections of this report.

## Other information

The Director of Finance & IT is responsible for the other information. The other information comprises the information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

## Responsibilities of the Director of Finance & IT for the financial statements

As explained more fully in the Statement of the Director of Finance & IT's Responsibilities, the Director of Finance & IT is responsible for the preparation of the Statement of Accounts, which includes the Pension Fund's financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22, and for being satisfied that they give a true and fair view. The Director of Finance & IT is also responsible for such internal control as the Director of Finance & IT determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

The Director of Finance & IT is required to comply with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 and prepare the financial statements on a going concern basis, unless the Council is informed of the intention for dissolution of the Pension Fund without transfer of services or function to another entity. The Director of Finance & IT is responsible for assessing each year whether or not it is appropriate for the Pension Fund to prepare its accounts on the going concern basis and disclosing, as applicable, matters related to going concern.

## Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the Pension Fund's financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a 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 the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. Based on our understanding of the Council, we identified that the principal risks of non-compliance with laws and regulations related to the Public Service Pensions Act 2013, the Local Government Pension Scheme Regulations 2013 (as amended) and the Local Government Pension Scheme (Management and Investment of Funds) Regulations, and we considered the extent to which non-compliance might have a material effect on the financial statements.

We evaluated the Director of Finance & IT's incentives and opportunities for fraudulent manipulation of the financial statements (including the risk of override of controls) and determined that the principal risks were related to posting manual journal entries to manipulate financial performance, management bias through judgements and assumptions in significant accounting estimates and significant one-off or unusual transactions.

Our audit procedures were designed to respond to those identified risks, including non-compliance with laws and regulations (irregularities) and fraud that are material to the financial statements. Our audit procedures included but were not limited to:

- discussing with management and the Governance and Audit Committee the policies and procedures regarding compliance with laws and regulations;
- communicating identified laws and regulations throughout our engagement team and remaining alert to any indications of non-compliance throughout our audit; and
- considering the risk of acts by the Fund which were contrary to applicable laws and regulations, including fraud.

Our audit procedures in relation to fraud included but were not limited to:

- making enquiries of management and the Governance and Audit Committee on whether they had knowledge of any actual, suspected
  or alleged fraud;
- gaining an understanding of the internal controls established to mitigate risks related to fraud;
- · discussing amongst the engagement team the risks of fraud; and
- · addressing the risks of fraud through management override of controls by performing journal entry testing.

There are inherent limitations in the audit procedures described above and the primary responsibility for the prevention and detection of irregularities including fraud rests with management and the Governance and Audit Committee. As with any audit, there remained a risk of non-detection of irregularities, as these may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal controls.

We are also required to conclude on whether the Director of Finance & IT's use of the going concern basis of accounting in the preparation of the financial statements is appropriate. We performed our work in accordance with Practice Note 10: Audit of financial statement and regularity of public sector bodies in the United Kingdom, and Supplementary Guidance Note 01, issued by the National Audit Office in April 2021.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's <a href="https://www.frc.org.uk/auditorsresponsibilities.">www.frc.org.uk/auditorsresponsibilities.</a> website at. This description forms part of our auditor's report.

## Matters on which we are required to report by exception under the Code of Audit Practice

We are required by the Code of Audit Practice to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make a recommendation under section 24 of the Local Audit and Accountability Act 2014; or
- we exercise any other special powers of the auditor under sections 28, 29 or 31 of the Local Audit and Accountability Act 2014.

We have nothing to report in these respects.

## Use of the audit report

This report is made solely to the members of City of Bradford Metropolitan District Council, as a body and as administering authority for the West Yorkshire Pension Fund, in accordance with part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 44 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the members of the Council 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 members of the Council, as a body, for our audit work, for this report, or for the opinions we have formed.

## [Signature]

Cameron Waddell Key Audit Partner For and on behalf of Mazars LLP 5th Floor 3 Wellington Place Leeds LS1 4AP

[Insert date]

## **West Yorkshire Pension Fund**

	Fund account for the year ended 31 March 2022		
2020-21		2021-22	Note
£000		£000	
	Dealings with members, employers and others directly involved in the Fund		
480,170	Contributions receivable	475,463	6
26,934	Transfers in	32,012	7
21,019	Non-statutory pensions and pensions increases recharged	20,171	8
528,123		527,646	
-550,077	Benefits payable	-591,305	9
-21,019	Non-statutory pensions and pensions increases	-20,171	8
-23,373	Payments to and on account of leavers	-19,993	10
-594,469		-631,469	
-66,346	Net additions/(withdrawals) from dealing with members	-103,823	
-10,002	Management expenses	-10,455	13
-76,348	Net additions/(withdrawals) including management expenses	-114,278	
	Returns on investments		
361,159	Investment income	425,221	15
-7,919	Taxes on income	-9,143	15a
2,833,734	Profit and losses (-) on disposal of and changes in value of investments	1,348,594	17
2,278	Stock lending	1,871	17c
3,189,252	Net return on investments	1,766,543	
3,112,904	Net Increase (decrease) in the net assets available for benefits during the year	1,652,264	
3,214,298	Opening net assets of the scheme	16,327,202	
6,327,202	Closing net assets of the scheme	17,979,466	

2020-21	Net assets statement at 31 March 2022	2021-22	Note
£000		£000	
	Investment assets		
1,315,811	Bonds	1,402,820	17
9,998,808	Equities (including convertible shares)	10,867,442	17
735,119	Index-linked securities	755,940	17
3,702,738	Pooled investment vehicles	4,251,295	17
7,300	Direct Property	7,350	17
422,003	Cash deposits	556,926	17
41,592	Cash at bank	6,230	17
58,153	Other investment balances	61,580	17
	Investments liabilities		
-13,990	Other investment balances	-43	17
16,267,534	Investments at 31 March	17,909,540	
	Current assets		
81,033	Debtors	95,663	20
	Current liabilities		
-21,365	Creditors	-25,737	21
59,668	Net current assets and liabilities	69,926	
16,327,202	Net assets of the scheme available to fund pension benefits	17,979,466	

The financial statements for West Yorkshire Pension Fund do not take account of liabilities to pay pensions and other benefits after 31 March 2022. This financial statement shows the net value of assets owned by the Fund, the actuarial calculation of the present value of promised retirement benefits is provided in note 12.

#### Note 1. Operations and Membership

The West Yorkshire Pension Fund (WYPF) provides for the payment of defined pension benefits to members or their dependents, from participating employers. It publishes its own detailed report and accounts document, which is available on the WYPF website address <a href="https://www.wypf.org.uk/publications/report-accounts/wypf-report-and-accounts/">https://www.wypf.org.uk/publications/report-accounts/wypf-report-and-accounts/</a>

**Administering Authority** – City of Bradford Metropolitan District Council is the administering authority for the Fund, and as such has statutory responsibility for the management and administration of the Fund. The Fund's entire investment portfolio is managed on a day to day basis in-house supported by the Fund's external advisers.

**Legal Status** – WYPF is a statutory scheme and the benefits are paid out under the provisions of the Local Government Pension Scheme Regulations (2013). It has been classified as a registered public service pension scheme under Chapter 2 of Part 4 of the Finance Act 2004.

The scheme is governed by the Public Service Pensions Act 2013.

The Fund is administered in accordance with the following secondary legislation:

- The Local Government Pension Scheme Regulations 2013 (as amended)
- The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended)
- The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016

**Management** – The West Yorkshire Pension Fund Joint Advisory Group is responsible for advising on the administration of the Fund. The group is made up of three elected members from each of the five West Yorkshire Metropolitan District Councils (MDCs), three Trade Union representatives and two Scheme members. The Investment Advisory Panel is responsible for advising on the investment of the Fund and comprises two elected members from each of the five West Yorkshire Metropolitan District Councils, three trade union representatives, two external investment advisors, two scheme members, the Director – West Yorkshire Pension Fund and a Chief Financial Officer from the West Yorkshire District Councils on a two-year rotational basis.

Participating employers – There were 463 participating employers during the year, 30 left in the year, leaving 433 at 31st March 2022 (409 employers as at 31st March 2021) whose employees were entitled to be contributors to the Fund.

Membership - Total membership as at 31st March 2022 is 307,797 (31st March 2021 is 298,307).

At 31 March 2021	Profile of membership	At 31 March 2022
101,079	Active members	104,891
100,869	Pensioner members	104,710
96,359	Members with preserved pensions	98,196
298,307	Total members	307,797

**Benefits payable** – On 1<sup>st</sup> April 2014, LGPS pensions became a career average scheme, whereby members accrue benefits based on their pensionable pay in that year at an accrual rate of 1/49<sup>th</sup>. Accrued pension is increased annually in line with Consumer Prices Index. Prior to April 2014 pension benefits under the LGPS were based on final pensionable pay and length of pensionable service as summarised below:

	Service pre 1 April 2008	Service post 31 March 2008
Pension	Each year worked is worth 1/80 x final pensionable salary	Each year worked is worth 1/60 x final pensionable salary
Lump sum	Automatic lump sum of 3 x pension. In addition, part of the annual pension can be exchanged for a one off tax free cash payment. A Lump sum of £12 is paid for each £1 of pension given up.	No automatic lump sum. Part of the annual pension can be exchanged for a one off tax free cash payment. A lump sum of £12 is paid for each £1 of pension given up.

#### Note 2. Actuary's Report

## West Yorkshire Pension Fund Statement of the Actuary for the year ended 31 March 2022

#### Introduction

The Scheme Regulations require that a full actuarial valuation is carried out every third year. The purpose of this is to establish that the West Yorkshire Pension Fund (the Fund) is able to meet its liabilities to past and present contributors and to review employer contribution rates. The last full actuarial investigation into the financial position of the Fund was completed as at 31 March 2019 by Aon, in accordance with Regulation 62 of the Local Government Pension Scheme Regulations 2013.

#### **Actuarial Position**

- 1. The valuation as at 31 March 2019 showed that the funding level of the Fund had increased since the previous valuation with the market value of the Fund's assets as at 31 March 2019 (of £14,363.0M) covering 106% of the liabilities allowing, in the case of pre- 1 April 2014 membership for current contributors to the Fund, for future increases in pensionable pay.
- 2. The valuation also showed that the aggregate level of contributions required to be paid by participating employers with effect from 1 April 2020 was:
  - 18.0% of pensionable pay. This is the rate calculated as being sufficient, together with contributions paid by members, to meet the liabilities arising in respect of service after the valuation date (the primary rate),

#### Plus

■ an allowance of 0.9% of pay for McCloud and cost management – see paragraph 9 below,

#### Less

- 2.3% of pensionable pay to restore the assets to 100% of the liabilities in respect of service prior to the valuation date over a recovery period of 22 years from 1 April 2020 (which together with the allowance above comprises the secondary rate).
- 3. In practice, each individual employer's or group of employers' position is assessed separately and contributions are set out in Aon's report dated 31 March 2020 (the "actuarial valuation report"). In addition to the contributions certified, payments to cover additional liabilities arising from early retirements (other than ill-health retirements) will be made to the Fund by the employers.

Total contributions payable by all employers over the three years to 31 March 2023 are estimated to be:

Year from 1 April	% of pensionable pay	Plus total contribution amount (£M)
2020	16.3	3.4
2021	16.5	2.4
2022	16.6	1.9

- 4. The funding plan adopted in assessing the contributions for each employer is in accordance with the Funding Strategy Statement. Different approaches were adopted in relation to the calculation of the primary contribution rate, stepping of contribution increases and individual employers' recovery periods as agreed with the Administering Authority and reflected in the Funding Strategy Statement, reflecting the employers' circumstances.
- 5. The valuation was carried out using the projected unit actuarial method for most employers and the main financial actuarial assumptions used for assessing the funding target and the contribution rates were as follows.

Discount rate for periods in service

Scheduled and Subsumption body funding target *	4.35% p.a.
Intermediate funding targets*  Low risk scheduled bodies  Low risk admission bodies and medium risk scheduled bodies  Medium risk admission bodies and higher risk scheduled bodies	4.10% p.a. 3.95% p.a. 3.80% p.a.
Ongoing Orphan funding target	3.30% p.a.
Discount rate for periods after leaving service	
Scheduled and Subsumption body funding target *	4.35% p.a.
Intermediate funding targets*  Low risk scheduled bodies  Low risk admission bodies and medium risk scheduled bodies  Medium risk admission bodies and higher risk scheduled bodies	4.10% p.a. 3.95% p.a. 3.80% p.a.
Ongoing Orphan funding target	1.60% p.a.
Rate of pay increases	3.35% p.a.
Rate of increase to pension accounts	2.10% p.a.
Rate of increases in pensions in payment (in excess of Guaranteed Minimum Pension)	2.10% p.a.

\* The Scheduled and Subsumption body and intermediate funding targets discount rates, as appropriate, were also used for employers whose liabilities will be subsumed after exit by an employer subject to that funding target.

In addition, the discount rate for already orphaned liabilities (i.e. where there is no scheme employer responsible for funding those liabilities and employer has exited the Fund) was 1.3% p.a.

The assets were valued at market value.

Further details of the assumptions adopted for the valuation, including the demographic assumptions, are set out in the actuarial valuation report.

6. The key demographic assumption was the allowance made for longevity. The post retirement mortality assumption adopted for the actuarial valuation was in line with standard self-administered pension scheme (SAPS) S2N mortality tables with appropriate scaling factors applied based on an analysis of the Fund's pensioner mortality experience and a Fund membership postcode analysis using Aon's Demographic HorizonsTM longevity model, and included an allowance for improvements based on the 2018 Continuous Mortality Investigation (CMI) Core Projections Model (CMI2018), with a Sk of 7.5, Adjustment Parameter of 0.00 and a long term annual rate of improvement in mortality rates of 1.5% p.a. The resulting average future life expectancies at age 65 (for normal health retirements) were:

	Men	Women
Current pensioners aged 65 at the valuation date	21.8	24.5
Current active members aged 45 at the valuation date	22.4	25.6

- 7. The valuation results summarised in paragraphs 1 and 2 above are based on the financial position and market levels at the valuation date, 31 March 2019. As such the results do not make allowance for changes which have occurred subsequent to the valuation date. The Administering Authority, in conjunction with the Actuary, monitors the funding position on a regular basis.
- 8. The formal actuarial valuation report and the Rates and Adjustments Certificate setting out the employer contribution rates for the period from 1 April 2020 to 31 March 2023 were signed on 31 March 2020. Other than as agreed or otherwise permitted or required by the Regulations, employer contribution rates will be reviewed at the next actuarial valuation of the Fund as at 31 March 2022 in accordance with Regulation 62 of the Local Government Pension Scheme Regulations 2013.
- 9. There are a number of uncertainties regarding the Scheme benefits and hence liabilities:

## Increases to Guaranteed Minimum Pensions (GMPs):

The 2019 valuation allows for the extension of the 'interim solution' for public service schemes to pay full inflationary increases on GMPs for those reaching State Pension Age (SPA) between 6 April 2016 and 5 April 2021. On 23 March 2021, the Government published a response to its consultation on the longer term solution to indexation and equalisation for GMPs and set out its proposal to extend the interim solution further to those reaching SPA after 5 April 2021.

The results of the 2019 valuation do not allow for the impact of this proposed longer term solution. Based on approximate calculations, at a whole of fund level, the impact of providing full pension increases on GMPs for those members reaching State Pension Age after 5 April 2021 is an increase in past service liabilities of between 0.1% to 0.2% across the Fund as a whole.

#### Cost Management Process and McCloud judgement:

Initial results from the Scheme Advisory Board 2016 cost management process indicated that benefit improvements / member contribution reductions equivalent to 0.9% of pay would be required. However, the cost management process was paused following the Court of Appeal ruling that the transitional arrangements in both the Judges' Pension Scheme (McCloud) and Firefighters' Pension Scheme (Sargeant) constituted illegal age discrimination. Government confirmed that the judgement would be treated as applying to all public service schemes including the LGPS (where the transitional arrangements were in the form of a final salary underpin) and a consultation on changes to the LGPS was issued in July 2020.

On 13 May 2021 Government confirmed the key elements of the expected changes to the LGPS to implement the McCloud judgement in a Written Ministerial Statement, although final Regulations are not expected to be come into force until 2023. After incorporating the potential costs of the McCloud remedy, the 2016 SAB cost management process has concluded, with no benefit improvements or member contribution changes being recommended under that process. However some uncertainty remains as the inclusion of McCloud costs in the cost management process is the subject of a Judicial Review.

The employer contributions certified from 1 April 2020 as part of the 2019 valuation include an allowance of 0.9% of pay in relation to the potential additional costs of the McCloud judgement / cost management process. This was a simplified approach which didn't take account of different employer membership profiles or funding targets and may be more or less than the assessed cost once the final details of the LGPS changes arising from the McCloud judgement and (if applicable) the 2016 cost management process have been confirmed.

#### Goodwin

An Employment Tribunal ruling relating to the Teachers' Pension Scheme concluded that provisions for survivor's benefits of a female member in an opposite sex marriage are less favourable than for a female in a same sex marriage or civil partnership, and that treatment amounts to direct discrimination on grounds of sexual orientation. The chief secretary to the Treasury announced in a written ministerial statement on 20 July 2020 that he believed that changes would be required to other public service pension schemes with similar arrangements, although these changes are yet to be reflected in LGPS regulations. We expect the average additional liability to be less than 0.1%, however the impact will vary by employer depending on their membership profile.

10. This Statement has been prepared by the Actuary to the Fund, Aon, for inclusion in the accounts of the Fund. It provides a summary of the results of the actuarial valuation which was carried out as at 31 March 2019. The valuation provides a snapshot of the funding position at the valuation date and is used to assess the future level of contributions required.

This Statement must not be considered without reference to the formal actuarial valuation report which details fully the context and limitations of the actuarial valuation.

Aon does not accept any responsibility or liability to any party other than our client, City of Bradford Metropolitan District Council, the Administering Authority of the Fund, in respect of this Statement.

11. The report on the actuarial valuation as at 31 March 2019 is available on the Fund's website at the following address:

https://www.wypf.org.uk/media/2850/wypf-2019-valuation-report.pdf

Aon Solutions UK Limited

June 2022

## Note 3. Accounting policies

#### Basis of preparation

The statement of accounts summarises the Fund's financial activities for the 2021/22 financial year and its financial position at yearend as at 31 March 2022. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector.

The financial statements summarise the transactions of the Fund and report on the net assets available to pay pension benefits. They do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year. The valuation of the present value of future benefits payable is provided by our actuary in note 12.

#### Contributions

Normal contributions from employers are accounted for on an accruals basis at the percentage rate recommended by the Fund actuary in the payroll period to which they relate. Normal contributions from members are accounted for on an accruals basis at a percentage rate outlined in the Local Government Pension Scheme Regulations

Employer deficit funding contributions are accounted for on the due dates on which they are payable.

Where employers have to pay the indirect costs of early retirement, these costs are accounted for in the period in which the liability arises. Any amount due but unpaid will be classed as current asset debtors.

#### Transfers in and out of the Fund

Transfer values represent amounts received and paid during the period. Bulk (group) transfers are accounted for on an accruals basis, these are calculated in accordance with the Local Government Pension Scheme Regulations 2013.

## Benefits payable

Pensions and lump-sum benefits payable include all amounts known to be due as at the end of the financial year. Any amounts due but unpaid are disclosed in the net assets statement as current liabilities.

## Management expenses

All management expenses are accounted for on an accruals basis. The Code does not require any breakdown of pension fund management expenses. However, in the interests of greater transparency, the Fund discloses its pension fund management expenses in accordance with CIPFA's preparing the annual report - Guidance for Local Government Pension Scheme (2019).

## Administrative expenses

All WYPF staff are charged directly to the Fund. Associated indirect management costs and other overheads are apportioned to administrative expenses using relevant factors and charged as expenses to the pension administration account of the Fund.

## Oversight and governance costs

All oversight and governance expenses are accounted for on an accruals basis. Associated indirect management costs and other overheads are apportioned to oversight and governance activities using relevant factors and charged as expenses to the oversight and governance account of the fund.

## Investment management expenses

All investment management expenses are accounted for on an accruals basis. Fees charged by external advisors and custodian are agreed in the respective mandates governing their appointment. The custodian fees are based on the market value of the investments under their management and unit price per transaction, therefore increase or reduce as the value of the investments and volume of transactions change. The fees of the external advisors increase by RPI on an annual basis.

The cost of the fund's in-house investment fund management team is charged direct to investment management expense and a proportion of the fund's management costs which represents management time spent by officers on investment management is also charged to investment management account of the Fund.

## Actuarial present value of promised retirement benefits

The actuarial present value of promised retirement benefits is assessed every three years per LGPS regulations and updated annually in the intervening years by the appointed actuary in accordance with the requirements of IAS19 and relevant actuarial standards. As permitted under IAS26, WYPF has opted to disclose the actuarial present value of promised retirement benefits as a note to the net

assets statement (note 12).

#### Cash and cash equivalents

Cash comprises of cash in bank and on demand deposits. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and that are subject to minimal risk of changes in values.

#### **Financial liabilities**

The fund recognises financial liabilities at amortised cost. A financial liability is recognised in the net assets statement on the date the fund becomes party to the liability.

#### Investment income

#### Interest income

Interest due on fixed-interest securities, index-linked securities and short-term investments is accounted for on an accruals basis.

#### Property related income

Property related income is primarily rental income which is recognised on a straight line basis over the term of the lease. Lease incentives have been recognised as a reduction of the total rental income over the term of the lease.

#### **Dividend income**

Dividend income is recognised on the date the shares are quoted ex dividend. Any amount not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset.

#### Distribution from pooled funds

Distributions from pooled funds are recognised at the date of issue. Any amount not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset.

## Movement in the net market value of investments

Changes in the net market value of investments (including investment properties) are recognised as income when positive (profits) and as expenditure when negative (losses). This comprises of all realised and unrealised profits/losses during the accounting period.

#### **Taxation**

The Fund is a registered public service pension scheme under section 1(1) of Schedule 36 of the Finance Act 2004 and as such is exempt from UK income tax on interest received and from capital gains tax on the proceeds of investments sold. Income from overseas investments suffers withholding tax in the country of origin, unless exemption is permitted. All tax paid are accounted for as expense as it arises and amount recovered are credited back to the account when received.

#### Financial assets

Financial assets are included in the net assets statement based on fair value or amortised cost. A financial asset is recognised in the net asset statement on the date the Fund becomes party to the contractual acquisition of the asset. From the date of recognition any gains or losses arising from changes in the fair value of assets held at fair value are recognised in the fund account. The values of investments as shown in the net assets statement have been determined at fair value in accordance with the requirements of the Code and IFRS13 (see note 18). For the purpose of disclosing levels of fair value hierarchy, the Fund has adopted the classification guidelines recommended in Practical Guidance on Investment Disclosures (PRAG / Investment Association, 2016).

## Additional voluntary contributions (AVCs)

West Yorkshire Pension Fund provides an additional voluntary contribution (AVC) scheme for its members, the assets of which are invested separately from those of the pension fund. The Fund has appointed Scottish Widows, Prudential and Utmost as its AVC providers. AVCs are paid to the AVC provider by employers and are specifically for providing additional benefits for individual contributors. Each AVC contributor receives an annual statement from AVC providers showing the amount held in their AVC account and the movements in the year.

AVCs are not included in the accounts in accordance with section 4(1)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 but are disclosed as a note only (Note 11).

#### **Currency translation**

At the year end all foreign currency balances are translated into sterling at exchange rates ruling at the financial year-end and any gains or losses arising are treated as part of the change in market value of investments. During the year foreign currencies are transacted as follows:

- a) Proceeds of sales of foreign assets are translated into sterling at the exchange rate on the day of sale and recorded in our investment book of records in sterling and in local currency.
- b) Purchase of foreign investments are translated into sterling using the exchange rate at the time of purchase and recorded in our investment book of record at book cost in sterling and local currency.
- c) Balance of foreign currency income accounts are moved daily to capital account using the mid-market rate on the date of movement.
- d) Dividends from foreign investments are translated into sterling using the mid-market rate on the date of receipt.
- e) When currency is sold or purchased the actual trade rate is used and commissions are charged to management expense.

## Acquisition costs of investments

Brokerage commissions, fees, stamp duties and foreign exchange fees paid as part of acquisition costs of investments are charged as revenue cost and included in investment management costs.

#### Netting

A financial asset and a financial liability shall be offset and the net amount presented in the Net Assets Statement when and only when, the Fund:

a) Currently has a legally enforceable right to set off the recognised amounts,

And

b) Intends either to settle on a net basis, or to realise the asset and settle the liability simultaneously.

#### Contingent liabilities and contractual commitments

A contingent liability arises when an event has taken place that gives the Fund a possible obligation, the existence of which will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the Fund. Contingent liabilities also arise in circumstances where a provision would otherwise be made but either it is not probable that an outflow of resources would be required or the amount of the obligation cannot be measured reliably. Contingent liabilities are not recognised in the Net Assets Statement but disclosed in a note 24 to the accounts.

Undrawn commitments relate to outstanding call payments due on unquoted limited partnership funds held in private equity, property and infrastructure parts of the portfolio. The amounts "called" by these funds are irregular in both size and timing over a period of between four and six years from the date of each original commitment.

#### Investment transactions

Investment transactions occurring up to 31 March 2022 but not settled until later are accrued in the accounts.

#### Note 4. Critical judgments in applying accounting policies

In applying the accounting policies set out in Note 3 above, WYPF has had to make certain critical judgements about complex transactions or those involving uncertainty about future events.

#### Assumptions made about the future and other major sources of estimation uncertainty

The preparation of the Fund's financial statements in accordance with IFRS requires management to make judgements, estimates and assumptions that affect the reported amounts of assets, liabilities, income and expenses. Due to the inherent uncertainty in making estimates, actual results reported in future periods may be based upon amounts which differ from those estimates. Estimates, judgements and assumptions are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Key sources of estimation uncertainty in these financial statements, which together are deemed critical to the Fund's results and financial position, are explained below.

## Fair value of financial instruments

In accordance with the Code and IFRS13, the Fund categorises financial instruments carried on the net asset statement at fair value using a three-level hierarchy as disclosed in note 18. Financial instruments categorised as level 1 are valued using quoted market prices and therefore there is minimal judgement applied in determining fair value. However, the fair value of financial instruments categorised as level 2 and, in particular, level 3 is determined using valuation techniques including discounted cashflow analysis and valuation models. These require management judgement and contain significant estimation uncertainty. Reliance is placed on our third parties to perform these valuations and further due diligence is performed by the Fund to maintain confidence in the data provided.

## Retirement benefit obligations

Under IFRS the Fund is required to disclose the actuarial present value of promised retirement benefits. This is disclosed as in note 12 and does not comprise part of the financial statements. Significant estimates are used in formulating this information, all of which are disclosed in note 12.

## Note 5. Events after the Balance sheet date

These are events, both favourable and unfavourable, that occur between the end of the reporting period and the date when the financial statements are authorised for issue.

Two types of events can be identified:

- a) Those that provide evidence of conditions that existed at the end of the reporting period (adjusting events after the reporting period).
- b) Those that are indicative of conditions that arose after the reporting period (non-adjusting events after the reporting period).

There have been no adjusting events since 31 March 2022 and up to the date when these accounts were authorised, that require any adjustments to these accounts.

## Note 6. Contributions receivable by category:

Contributions from employers and employees:

2020-21	Analysis of contributions receivable	2021-22
£000		£000
353,385	Employers	340,809
126,785	Members	134,654
480,170	Total contributions receivable	475,463

Contributions by type of employer:

2020-21	Analysis by type of employer	2021-22
£000		2000
52,806	Administering Authority	56,589
389,501	Scheduled bodies	382,106
37,863	Admitted bodies	36,769
480,170	Total contributions receivable	475,463

Contributions are further analysed by type of contribution:

2020-21	Contributions receivable by type	2021-22
£000		£000
122,673	Employees normal contributions	127,362
4,112	Employees additional contributions	7,292
313,057	Employers normal contributions	338,521
40,328	Employers deficit contributions	2,288
480,170	Total contributions receivable	475,463

## Employers' contribution rates and deficit contributions

Employer contributions receivable in 2021-22 were based on 31 March 2019 triennial valuation. At each triennial valuation (latest 31 March 2019) the Actuary calculates an employer rate for each employer. In addition to this some employers are also required to pay an additional monetary amount to cover any past service deficit, which is recoverable over an appropriate period.

## Employees' contribution rates

Employees' contributions are as set out in the LGPS regulations from 1st April 2014, and there are several tiered employee contribution rates. The rates for 2021/22 based on pay bandings in the financial year are provided below.

2021/22 Pay	Contribution rate
Up to £14,600	5.5%
£14,601 to £22,900	5.8%
£22,901 to £37,200	6.5%
£37,201 to £47,100	6.8%
£47,101 to £65,900	8.5%
£65,901 to £93,400	9.9%
£93,401 to £110,000	10.5%
£110,001 to £165,000	11.4%
£165,001 or more	12.5%

## Note 7. Transfers in

2020-21	Transfers in from other pension funds	2021-22
£000		000£
25,288	Individual transfers in from other schemes	32,012
1,646	Bulk transfer in from other schemes	0
26,934	Total transfers in	32,012

## Note 8. Non-statutory pensions and pensions increase recharged

2020-21	Non-statutory pensions and pensions increase recharged	2021-22
£000		£000
21,019	Pensions	20,171

The costs of added years granted by participating employers for early retirement together with associated inflation proofing costs are reimbursed to the Fund by the employer. Costs of annual inflation proofing for non-participating employers are also recharged.

Note 9. Benefits payable

2020-21	Analysis of benefits payable	2021-22
£000		2000
	Funded pensions	
-406,808	Retired employees	-426,763
-33,611	Dependents	-33,499
	Funded lump sums	
-95,919	On retirement	-117,537
-13,739	On death	-13,506
-550,077	Total Benefits Payable	-591,305

The total benefits payable are further analysed by type of member body.

2020-21	Analysis of benefits payable by member body	2021-22
£000		£000
-81,348	Administering Authority	-84,132
-415,221	Scheduled bodies	-446,975
-53,508	Admitted bodies	-60,198
-550,077	Total benefits payable	-591,307

For participating employers, all basic pensions plus the costs of annual inflation proofing are met from the assets of the fund.

Note 10. Payments to and on account of leavers

2020-21	December to and an account of lances	2021-22
£000	Payments to and on account of leavers	£000
-1,266	Refund of contributions	-1,488
-22,107	Individual transfers out to other schemes	-18,505
-23,373	Total transfers out	-19,993

## Note 11. AVC scheme with Equitable Life, Scottish Widows and Prudential

The Fund provides an AVC Scheme for its contributors, the assets of which are invested separately from the main Fund. The scheme providers are Utmost, Scottish Widows and Prudential, whereby additional benefits are secured on a money purchase basis for those contributors electing to pay additional voluntary contributions.

As advised by the three companies the amounts administered under AVC arrangements are as follows:

2020-21		2021-22
£000 (restated)	Additional voluntary contributions	£000£
32,865	Value of funds at 1st April	40,616
7,134	Contributions received	8,813
145	Transfers and withdrawals	30
4,998	Interest and bonuses / change in market value of assets	-6,995
-4,526	Sale of investments to settle benefits due to members	-7,930
40,616	Value of fund at 31st March	34,534

The aggregate amounts of AVC investments are:

2020-21	AVC investments	2021-22
£000 (restated)		000£
2,090	Utmost	1,980
26,764	Prudential	30,896
11,762	Scottish Widows	1,658
40,616	Total	34,534

Prudential were unable to provide details of contributions made by scheme members or the total value of the fund's invested by Prudential on behalf of members of the West Yorkshire Pension Fund at 31 March 2021. These details have now been received and the total restated

## Note 12. Actuarial present value of promised retirement benefits

The fund is part of the Local Government Pension Scheme and under IAS 26 it is required to disclose the actuarial present value of promised retirement benefits across the fund as a whole. The fund provides defined benefits, which for membership to 31 March 2014, are based on members' final pensionable pay. On the 1 April 2014 the scheme changed from a final salary scheme to a CARE (career average revalued earnings) scheme and pension benefits are based on a member's pay in each scheme year. The required valuation is carried out by the fund actuary Aon Hewitt using assumptions derived in the same way as those recommended for individual participating employers reporting pension liabilities under IAS 19. This approach results in a different valuation of liabilities than at the triennial funding.

#### Introduction

IAS 26 requires the 'actuarial present value of the promised retirement benefits' to be disclosed, which is the IAS 26 terminology for what IAS 19 refers to as the 'defined benefit obligation'. The information set out below relates to the actuarial present value of the promised retirement benefits in WYPF which is part of the Local Government Pension Scheme. The LGPS is a funded defined benefit plan with benefits earned up to 31 March 2014 being linked to final salary. Benefits after 31 March 2014 are based on a Career Average Revalued Earnings scheme. Details of the benefits covered by these figures are set out in 'The Local Government Pension Scheme Regulations 2013' (as amended) and 'The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014' (as amended).

## Actuarial present value of promised retirement benefits (defined benefit obligation)

Paragraph 6.5.2.8 of CIPFA's Code of Practice on local authority accounting for 2021/22 sets out that for consistency with employers' IAS 19 actuarial report, that the actuarial present value of promised retirement benefits based on projected salaries should be disclosed in the Pension Fund Account.

The results as at 31 March 2019, together with the results as at 31 March 2016 are shown in the table below. The corresponding fair value of Fund assets is also shown in order to show the level of surplus or deficit within the Fund when the liabilities are valued using IAS 19 assumptions.

	Value as at 31 March 2019 £M	Value as at 31 March 2016 £M
Fair value of net assets Actuarial present value of the defined benefit obligation (see Notes)	14,363.0 -19,365.8	11,211.0 -14,085.4
Surplus / (deficit) in the Fund as measured for IAS 26 purposes	-5,002.8	-2,874.4

#### McCloud / Sargeant judgement

The actuarial present value of the defined benefit obligation at 31 March 2019 includes an estimated liability in relation to the McCloud/Sargeant judgement of £33.15M. The McCloud / Sargeant judgement (December 2018) found that the transitional arrangements put in place when the firefighters' and judges' pension schemes were reformed constituted illegal discrimination. The Government has since committed to compensate members of all public service schemes who were illegally discriminated against. In relation to the LGPS in England and Wales all members joined the new 2014 Scheme for membership after 1 April 2014, but members within 10 years of normal retirement were given an underpin (or 'better of both') promise, so their benefits earned after 1 April 2014 would be at least as valuable in terms of amount and when they could be drawn, as if they had remained in the 2008 Scheme.

The additional liability included within this note assumes the underpin will be extended to cover all members who were actively participating in the scheme on 1 April 2012 (and not just those within 10 years of retirement) and will apply on retirement or the date of leaving service if earlier.

## **Equalisation and Indexation of Guaranteed Minimum Pensions**

The actuarial present value of the defined benefit obligation includes an estimated liability in relation to the equalisation and indexation of Guaranteed Minimum Pensions (GMPs) beyond the arrangements already formally in place, which apply to members whose State Pension Age (SPA) is between 6 April 2016 and 5 April 2021 inclusive. Those arrangements require the LGPS to pay pension increases on GMPs at the full rate of CPI for those members, whereas GMP legislation only requires limited price increases to be applied. The additional liability included within this note assumes those arrangements for fully indexing GMPs will be extended to members whose SPA is after 5 April 2021. This has increased the defined benefit obligation by in the region of 0.1% to 0.2%.

#### **Cost Management Process**

The actuarial present value of the defined benefit obligation does not allow for any potential additional liability which may arise from the cost management valuations. Legislation requires HM Treasury and the Scheme Advisory Board (SAB) to undertake periodic valuations to monitor the cost of the LGPS to ensure it remains sustainable and affordable.

HM Treasury and the SAB have paused their reviews following the 'McCloud' judgement in the Court of Appeal. The cost cap process will not recommence until the remedy as applies to the LGPS has been decided.

On 24 April 2020 a number of Trades Unions filed court proceedings to challenge the Government's decision to pause the cost management process. If successful this could lead to higher liabilities and employer costs although it is not yet known how such changes, and those required due to the McCloud case, will affect the cost management valuation due as at 31 March 2020 which it is expected would lead to changes in benefits and/or member contributions in future.

#### **Assumptions**

The latest full triennial actuarial valuation of the Fund's liabilities was carried out as at 31 March 2019. The principal assumptions used for the purpose of IAS 26 by the Fund's independent qualified actuaries were:

	31 March 2019 (% p.a.)	31 March 2016 (% p.a.)
Discount rate CPI Inflation (pension increases) * Rate of general increase in salaries **	2.40 2.20 3.45	3.40 1.80 3.05

<sup>\*</sup> In excess of Guaranteed Minimum Pension increases in payment for members whose State Pension Age is on or before 5 April 2016 where appropriate

#### Principal demographic assumptions

The mortality assumptions are based on actual mortality experience of members within the Fund based on analysis carried out as part of the 2019 Actuarial Valuation and allow for expected future mortality improvements. Sample life expectancies at age 65 in normal health resulting from these mortality assumptions are shown below:

	31/03/2019	31/03/2016
Males		
Future lifetime from age 65 (pensioners aged 65 at 31 March 2019)	21.8	22.0
Future lifetime from age 65 (actives aged 45 at 31 March 2019)	22.4	22.9
Females		
Future lifetime from age 65 (pensioners aged 65 at 31 March 2019)	24.5	25.1
Future lifetime from age 65 (actives aged 45 at 31 March 2019)	25.6	26.9

Different mortality assumptions have been used for other categories of member as set out in the actuary's report on the 2019 valuation. Assumptions for the rates of the rates of withdrawal and ill health retirements (for active members), the allowance made for cash commutation on retirement, and the proportion of members whose death gives rise to a dependent's pension are the same as those adopted in the 2019 valuation of the Fund, which are detailed in the actuary's valuation report.

#### Key risks associated with reporting under IAS 26 and sensitivity

#### Volatility of results

Results under IAS 26 can change dramatically depending on market conditions. The defined benefit obligation is linked to yields on AA-rated corporate bonds, while a significant proportion of the assets of the Fund are invested in equities and other growth assets. Changing markets in conjunction with discount rate volatility will lead to volatility in the funded status of the pension fund.

#### For example:

- A decrease in corporate bond yields will increase the value placed on the liabilities for accounting purposes, although this will be marginally offset by the increase in the assets as a result (to the extent the Fund invests in corporate bonds).
- The majority of the pension liabilities are linked to either pay or price inflation. Higher inflation expectations will lead to a higher liability value. The assets are not perfectly correlated with inflation meaning that an increase in inflation will increase the deficit.
- The majority of the Fund's obligations are to provide benefits for the life of the member following retirement, so increases in life expectancy will result in an increase in the liabilities.

#### Choice of accounting assumptions

The calculation of the actuarial present value of the promised retirement benefits involves projecting future cash-flows from the Fund many years into the future. This means that the assumptions used can have a material impact on the surplus / deficit.

<sup>\*\*</sup> In addition, allowance has been made for the same age related promotional salary scales as used at the actuarial valuation of the Fund as at the appropriate date

Furthermore, as required by the accounting standard, the assumptions (with the exception of the discount rate) have been set so that they represent a best estimate of future experience for the Fund. In practice future experience within the Fund may not be in line with the assumptions adopted. This means that the liabilities shown in this report only represent one view of the future and the true position could be different from those shown. For example, members could live longer than foreseen or inflation could be higher or lower than allowed for in the calculations.

## Sensitivity of results to key assumptions

In order to understand the magnitude of the possible volatility in the balance sheet position and to understand which assumptions are most important in determining the size of the liabilities, it is helpful to understand how sensitive the results are to the key assumptions.

We have set out below how the results would alter by changing the discount rate, the pay increase assumption and pension increase assumption by plus or minus 0.1% and if life expectancy was to reduce or increase by 1 year. In each case, only the assumption mentioned is altered; all other assumptions remain the same.

#### **Sensitivity Analysis**

Discount rate assumption			
Adjustment to discount rate assumption	+0.1% £M	-0.10% £M	
£ change to present value of the defined benefit obligation	-396.0	404.2	
% change in present value of defined benefit obligation	-2.0%	2.1%	

Rate of general increase in salaries			
Adjustment to salary increase rate assumption	+0.1% £M	-0.10% £M	
£ change to resent value of the defined benefit obligation	50.1	-49.5	
% change in present value of defined benefit obligation	0.3%	-0.3%	

Rate of increase to pensions in payment, deferred pensions increase assumption and rate of revaluation of pension accounts			
Adjustment to pension increase rate assumption  +0.1%  -0.10%  £M  £M			
£ change to present value of the defined benefit obligation	354.2	-346.5	
% change in present value of defined benefit obligation	1.8%	-1.8%	

Post retirement mortality assumption			
Adjustment to members' life expectancy	+1 year £M	-1 year £M	
£ change to present value of the defined benefit obligation	-745.4	757.9	
% change in present value of defined benefit obligation	-3.9%	3.9%	

## Note 13. Management expenses

2020-21	Management expenses	2021-22
£000		£000
-4,002	Administration costs	-4,225
-5,129	Investment Management expenses	-5,531
-871	Oversight and Governance	-699
-10,002	Total administrative expenses	-10,455

This analysis of the costs of managing West Yorkshire Pension Fund during the accounting period has been prepared in accordance with CIPFA guidance. The investment management expenses above includes a statutory audit fee of £37.4k (2020/21 £37.4k) is included on oversight and governance. The statutory audit fee does not include fees chargeable to the fund for pension assurance work undertaken at the request of employer auditors. Fees payable for this work total £18k (2020/21 £14.9k) and are recharged to the relevant employers. No other fees have been paid to the external auditor.

Investment management expenses is further analysed in Note 14.

The costs associated with the setting up and running Northern LGPS that relate specifically to WYPF are included within the administration costs above. The costs for the 2021/22 reporting period are £120k (2020/21 £75.6k).

Note 14. Investment expenses

Bonds 350 Equities 3,514 Index-linked securities 189 Pooled investment vehicles 1,062	£000		
Equities 3,514 Index-linked securities 189		£000	£000
Index-linked securities 189	350	0	0
	2,715	0	799
Pooled investment vehicles 1,062	189	0	0
	1,062	0	0
Direct property 2	2	0	0
Cash deposits 157	157	0	0
5,279	4,475	0	799
Custody fees 257			
Total 5,531			

2020-21	Total	Management fees	Performance fees	Transaction costs
	£000	£000	£000	£000
Bonds	333	333	0	0
Equities	3,315	2,529	0	786
Index-linked securities	186	186	0	0
Pooled investment vehicles	963	936	0	27
Direct property	2	2	0	0
Cash deposits	128	128	0	0
	4,927	4,114	0	813
Custody fees	202			
Total	5,129			
_				

Investment expenses are included in within management expenses (note 13). Investment expenses are of particular interest to LGPS funds' stakeholders and as such further breakdown of this cost is provided here. Transaction costs are included to comply with CIPFA guidance. All of the assets that WYPF hold are managed by a team of internal investment managers and as such we do not incur any performance fees.

Note 15. Investment income

2020-21	Investment income	2021-22
£000		£000£
39,418	Income from bonds	39,191
272,289	Dividends from equities	311,676
3,532	Income from index-linked securities	3,475
44,287	Income from pooled funds	69,706
449	Income from direct property	662
1,184	Interest on cash deposits	511
361,159	Total investment income	425,221

## Note 15a. Tax on income

2020-21	Tax on income	2021-22
£000		£000
-7,919	Tax on dividends	-9,942
0	Investment tax reclaim	799
-7,919	Total	-9,143

## Note 16. Direct Property Holdings

At 31 March 2021	Direct Property Holdings	At 31 March 2022
£000		000£
6,675	Opening balance	7,300
	Additions:	
625	Net Increase/ decrease in market value	50
7,300	Closing value	7,350

## Note 17. Investments

#### Note 17a.Movement in the value of investments in 2021-22

	Opening value at 1 April 2021	Purchases costs	Sales proceeds	Change in Market value	Closing value at 31 March 2022	
	£000	£000	£000	£000	£000	
Bonds	1,315,811	321,298	-155,978	-78,311	1,402,820	
Equities	9,998,808	325,313	-290,052	833,373	10,867,442	
Index linked securities	735,119	7,643	-30,909	44,087	755,940	
Pooled funds	3,702,738	459,521	-458,812	547,848	4,251,295	
Direct property	7,300	0	0	50	7,350	
Cash deposits	422,003	1,333,181	-1,199,805	1,547	556,926	
Cash at bank	41,592	0	-35,362	0	6,230	
Other investment debtors	58,153	*3,427	0	0	61,580	
Other investment creditors	-13,990	*13,947	0	0	-43	
Total investments	16,267,534	2,464,330	-2,170,918	1,348,594	17,909,540	

<sup>\*</sup> Balancing figure due to adjustments through purchases and sales.

## Movement in the value of investments in 2020-21

	Opening value at 1 April 2020	Purchases costs	Sales proceeds	Change in Market value	Closing value at 31 March 2021
	£000£	£000	£000	£000	£000
Bonds	1,387,187	335,004	-425,563	19,183	1,315,811
Equities	7,675,343	330,603	-260,462	2,253,324	9,998,808
Index linked securities	736,119	53,160	-52,570	-1,590	735,119
Pooled funds	3,071,112	326,236	-259,111	564,501	3,702,738
Direct property	6,675	0	0	625	7,300
Cash deposits	254,625	1,098,393	-931,008	-7	422,003
Cash at bank	46,842	0	-2,948	-2,302	41,592
Other investment debtors	53,918	0	4,235	0	58,153
Other investment creditors	-51,239	*37,249	0	0	-13,990
Total investments	13,180,582	2,180,645	-1,927,427	2,833,734	16,267,534

<sup>\*</sup> Balancing figure due to adjustments through purchases and sales.

The change in market value of investments during the year includes all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year. A further analysis of the asset split between overseas and UK can be found in note 23.

## b. Analysis of Investments by security type

At 31 March 2021	Analysis of investments closing market values	At 31 March 2022
£000		£000
	Bonds:	
782,562	Public sector quoted	731,966
533,249	Other quoted	670,854
1,315,811		1,402,820
9,998,808	Equities	10,867,442
735,119	Index linked securities	755,940
	Pooled funds:	
105,585	Hedge funds	124,360
606,022	Property	717,807
1,220,217	Equity	1,125,960
1,047,999	Private equity	1,250,522
722,915	Private equity infrastructure	1,032,646
3,702,738		4,251,295
7,300	Direct Property	7,350
422,003	Cash deposits	556,926
41,592	Cash in bank	6,230
58,153	Other Investment assets	61,580
-13,990	Other Investment liabilities	-43
16,267,534	Total	17,909,540

## c. Stock Lending

2020-21	Analysis of stock lending	2021-22
£000		£000
	Income	185
176	- Bonds	103
396	- UK equities	235
1,782	- International equities	1,533
-76	Expenditure	-82
2,278	Total	1,871

As at 31 March 2022, the value of stock on loan to market makers was £851m (31 March 2021 £660m) and this was covered by collateral totalling £916m (31 March 2021 £702m) which includes an appropriate margin. The collateral includes a basket of Equities £315 million (31 March 2021 £163 million), United Kingdom Gilts £77million (31 March 2021 £159 million), US Equities £245 million (31 March 2021 £191 million) and Government Debt £50 million (31 March 2021 £17 million).

## Note 18. Fair Value - Basis of valuation

The classification of assets within the fair value hierarchy is determined using the criteria set out in IFRS13 Fair Value Measurement. The basis of the valuation of each class of investment asset is set out below. There has been no change in the valuation techniques used during the year. All assets have been valued using fair value techniques which represent the highest and best price available at the reporting date. Transfers between levels are deemed to have occurred when there is a significant change to the level of observable and unobservable inputs used to determine fair value.

Description of asset	' Upservable and unopservable		Key sensitivities affecting the valuations provided	
Market quoted equities	Level 1	Listed investments are shown at bid prices. The bid value of the investments is based on the bid market quotation of the relevant stock exchange.	Not required	Not required
Quoted bonds	Level 1	Fixed interest securities are valued at a market value based on current yields	Not required	Not required
Cash deposits, investment balances and debtors	Level 1	Cash value at yearend	Not required	Not required.
Pooled investment- overseas unit trusts and quoted property funds	Level 2	Closing bid price where bid and offer prices are published - closing single price where single price is published. Valuations for Property Funds are provided by Fund managers and where available closing bid price is used.	NAV - based pricing set on a forward pricing basis.	Not required

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Description of asset	Valuation Hierarchy	Basis of valuation	Observable and unobservable	Key sensitivities affecting the valuations provided
Unquoted bonds	Level 3	Fund managers' capital statements	Evaluated price feeds	Not required
All unquoted, delisted or suspended assets, pooled investments - hedge funds, unit trusts and property funds	Level 3	Closing bid price where bid and offer prices are published - closing single price where single price is published.	These are based on the net asset values provided by the fund managers. Values are normally received by West Yorkshire Pension Fund between 30 and 90 days after the month end to which they relate. The values reported in the financial statements are therefore based on December 2021 to March 2022, adjusted according to estimates of investment fund performance in March, as informed by fund managers. We gain assurance over valuations and capital statements provided by fund managers by comparing valuations to funds' audited accounts' Net Asset Values and updated capital statements provided in subsequent periods. In the case of delisted assets we use latest available price or price advised by investment managers.	Valuations could be affected by material events occurring between the date of the financial statements provided and the pension funds own reporting date by changes to expected cashflows and by any differences between audited and unaudited accounts.
Freehold and leasehold properties	Level 3	Valued at fair value at the year- end by CBRE independent valuers- in accordance with the RICS Valuation – Global Standards 2017 which incorporate the International Standards and the RICS Valuation – Professional Standards UK January 2014 (revised July 2017) ("The Red Book").	Existing lease terms - Independent market research - Nature of tenancies - Estimated growth - Assumed vacancy levels - Discount rate	Changes in rental growth, vacancy levels or discount rates could affect valuations as could changes to market prices.
Unquoted equity	Level 3	Comparable valuation of similar companies in accordance with International Private Equity and Venture Capital Valuation Guidelines (2012)	These are based on valuations provided by the general partners to the private equity funds in which West Yorkshire Pension Fund has invested. They are prepared in accordance with the International Private Equity and Venture Capital Valuation Guidelines, which follow the valuation principles of IFRS and US GAAP. Valuations are performed annually and mainly as at the end of December. Cashflow adjustments are used to roll forward the valuations to 31 March as appropriate.	Valuations could be affected by material events occurring between the date of the financial statements provided and the pension funds own reporting date by changes to expected cashflows and by any differences between audited and unaudited accounts.

## Sensitivity of assets valued at level 3

The fund has determined that the valuation methods described in the table above are likely to be accurate within the following ranges and has set out below the potential impact on the closing value of investments held at 31 March 2022.

Sensitivity of assets valued at level 3	Assessed valuation range (+/-)	Value at 31 March 2022	Value on increase	Value on decrease
		£m	£m	£m
Pooled investments - hedge funds	17.8%	124.1	146.2	102.0
Property funds	18.6%	717.8	851.3	584.3
Direct property	10.1%	7.4	8.1	6.7
Private equity inc NLGPS	34.9%	2,283.2	3,080.0	1,486.4
Other assets	0.5%	16.7	16.8	16.6
		3,149.2	4,102.4	2,196.0

The sensitivity analysis figures have been restated for 2020/21 to correct the percentages used in the disclosure. The impact of which can be seen in the tables below:

Restated 2020/21 sensitivity analysis figures:

Sensitivity of assets valued at level 3	Assessed valuation range (+/-)	Value at 31 March 2021	Value on increase (restated)	Value on decrease (restated)
Pooled investments - hedge funds	11.2%	£m 105.3	£m 117.1	<b>£m</b> 93.5
Property funds	1.5%	453.1	459.9	446.3
Direct property	16.6%	7.3	8.5	6.1
Private equity inc NLGPS	5.4%	1,770.9	1,866.5	1,675.3
Other assets	1.5%	45.5	46.2	44.8
		2,382.1	2,498.2	2,266.0

Previously stated 2020/21 sensitivity analysis figures:

Sensitivity of assets valued at level 3	Assessed valuation range (+/-)	Value at 31 March 2021	Value on increase	Value on decrease
		£m	£m	£m
Pooled investments - hedge funds	10%	105.3	115.8	94.8
Property funds	10%	453.1	498.4	407.8
Direct property	10%	7.3	8.0	6.6
Private equity inc NLGPS	15%	1,770.9	2,036.5	1,505.3
Other assets	10%	45.5	50.1	41.0
		2,382.1	2,708.8	2,055.5

#### Financial instruments - valuation

#### Valuation of financial assets carried at fair value.

The valuations of financial assets have been classified into three levels according to the quality and reliability of information used to determine the fair values. Transfers between levels are recognised in the year in which they occur.

Level 1 fair value measurements are those derived from unadjusted quoted prices in active markets for identical assets or liabilities. Financial assets classified as level 1 comprise quoted equities, quoted bonds (fixed interest securities), quoted index linked securities and unit trusts.

Level 2 valuations are those where quoted market prices are not available, for example where the financial asset is traded in a market that is not considered to be active or valuation techniques are used to determine fair value and where these techniques use inputs that are based significantly on observable market data. Financial asset classified as level 2 are quoted property funds.

**Level 3** portfolios are those where at least one input which could have a significant effect on the instrument's valuation is not based on observable market data. Such instruments would include unquoted equity investments and hedge funds or unquoted property funds, which are valued using various valuation techniques that require significant judgement in determining appropriate assumptions.

The table below provides an analysis of the financial assets and liabilities of the Fund that are carried at fair value in the Fund's Net Asset Statement, grouped into levels 1 to 3 based on the degree to which the fair value is observable.

## Valuation hierarchy as at 31st March 2022

	At 31 March 2022			
	Level 1	Level 2	Level 3	Total
	£m	£m	£m	£m
Financial assets				
Financial assets at fair value through profit & loss	13,447	689	3,142	17,278
Financial assets at amortised cost	720	0	0	720
Total financial assets	14,167	689	3,142	17,998
Non financial assets at fair value through profit and loss				
Property	0	0	7	7
Financial liabilities				
Financial liabilities at amortised cost	-26	0	0	-26
Total financial liabilities	-26	0	7	-19
	14,141	689	3,149	17,979

## Valuation hierarchy as at 31st March 2021

	At 31 March 2021			
	Level 1	Level 2	Level 3	Total
	£m	£m	£m	£m
Financial assets				
Financial assets at fair value through profit & loss	12,510	868	2,375	15,753
Financial assets at amortised cost	603	0	0	603
Total financial assets	13,113	868	2,375	16,356
Non financial assets at fair value through profit and loss				
Property	0	0	7	7
Financial liabilities				
Financial liabilities at amortised cost	-35	0	0	-35
Total financial liabilities	-35	0	7	-28
	13,078	868	2,382	16,328

## Reconciliation of fair value measurements within level 3

	Market value 01-Apr-21	Purchases	Sales	Change in market value	Market value 31-Mar-22
	£000	£000	£000	£000	£000
Pooled investments - Hedge funds	105,328	0	0	18,818	124,146
Property funds	453,078	26,886	-34,910	272,753	717,807
Direct property	7,300	0	0	50	7,350
Private equity(inc NLGPS)	1,770,914	426,641	-369,051	454,662	2,283,167
Other assets	45,549	12,038	-389	-40,512	16,686
	2,382,170	465,565	-404,350	705,771	3,149,156

	Market value 01-Apr-20	Purchases	Sales	Change in market value	Market value 31-Mar-21
	£000	£000	£000	£000	£000
Pooled investments - Hedge funds	94,683	0	0	10,645	105,328
Property funds	455,028	17,088	-7,623	-11,415	453,078
Direct property	6,675	0	0	625	7,300
Private equity(inc NLGPS)	1,545,224	303,950	-224,682	146,422	1,770,914
Other assets	55,244	123	-8,190	-1,628	45,549
	2,156,854	321,161	-240,495	144,649	2,382,170

## Note 19. Financial instruments - classification

The following table analyses the carrying amounts of the financial assets and liabilities by category and by net asset statement heading as at 31st March 2022. The table also includes Direct Property (non-financial instrument) for completeness.

31st March 2022	Fair value through profit	Financial assets at amortised cost	Financial liabilities at	Total financial instruments
	& loss	amortiseu cost	amortised cost	ilisti ullients
	£000	£000	£000	£000
Financial Assets				
Bonds	1,402,820	0	0	1,402,820
Equities	10,867,442	0	0	10,867,442
Index-linked securities	755,940	0	0	755,940
Pooled investment vehicles	4,251,295	0	0	4,251,295
Cash deposits		556,926	0	556,926
Cash at bank		6,230	0	6,230
Other investment balances	0	61,580	0	61,580
Debtors	0	95,663	0	95,663
Total financial assets	17,277,497	720,399	0	17,997,896
Financial Liabilities				
Other investment balances	0	0	-43	-43
Creditors	0	0	-25,737	-25,737
Total financial liabilities	0	0	-25,780	-25,780
Total	17,277,497	720,399	-25,780	17,972,116
Non-Financial instrument assets				
Direct Property	7,350	0	0	7,350
Total	17,284,847	720,399	-25,780	17,979,466

31st March 2021	Fair value through profit & loss	Financial assets at amortised cost	Financial liabilities at amortised cost	Total financial instruments
	£000	£000	£000	£000
Financial Assets				
Bonds	1,315,811	0	0	1,315,811
Equities	9,998,808	0	0	9,998,808
Index-linked securities	735,119	0	0	735,119
Pooled investment vehicles	3,702,738	0	0	3,702,738
Cash deposits	0	422,003	0	422,003
Cash at bank	0	41,592	0	41,592
Other investment balances	0	58,153	0	58,153
Debtors	0	81,033	0	81,033
Total financial assets	15,752,476	602,781	0	16,355,257
Financial Liabilities				
Other investment balances	0	0	-13,990	-13,990
Creditors	0	0	-21,365	-21,365
Total financial liabilities	0	0	-35,355	-35,355
Total	15,752,476	602,781	-35,355	16,319,902
Non-Financial instrument assets				
Direct Property	7,300	0	0	7,300
Total	15,759,776	602,781	-35,355	16,327,202

All net gains or losses on financial instruments are on those instruments classified as financial assets at fair value through profit or loss.

#### Note 20. Current assets

At 31 March 2021 £000		At 31 March 2022 £000
	Debtors	
29,614	Contributions due from employees and employers	37,980
51,419	Other debtors	57,683
81,033	Total current assets	95,663

All debtors are trade debtors with payments due within 12 months.

## Note 21. Current liabilities

At 31 March 2021 £000	Current liabilities	At 31 March 2022 £000
	Creditors	
-9,811	Unpaid benefits	-11,278
-11,554	Other current liabilities	-14,459
-21,365	Total current liabilities	-25,737

## Note 22. Related party transactions

In accordance with IAS24 Related Party Disclosures, material transactions with related parties not disclosed elsewhere are detailed below.

#### Administering body

Bradford Metropolitan District Council is a related party in its role as the Administering Authority for West Yorkshire Pension Fund.

In 2021/22, City of Bradford Metropolitan District Council charged West Yorkshire Pension Fund £459k in respect of support services provided (£444k in 2020/21). The support costs include a full year support for financial systems, payroll, HR, legal, internal audit and information technology services.

## **Employers**

Employers are related parties in so far as they pay contributions to the Fund in accordance with the appropriate Local Government Pension Scheme (LGPS) Regulations. A list of employers who have contributed to the fund during the reporting period can be found in note 27 of this report. Contributions owed by employers in respect of March 2022 payroll are included within the total debtors figures in note 20.

#### **Members**

The Metropolitan Councils of Bradford, Leeds, Kirklees, Wakefield and Calderdale appoint a number of members to the Investment Advisory Panel and the Joint Advisory Group. Six of these members are in receipt of pension benefits from the Fund.

There have been no material transactions between any member or their families and the Pension Fund.

#### Key management personnel

No senior officers responsible for the administration of the Fund have entered into any contract, other than their contract of employment with City of Bradford Metropolitan District Council, for the supply of goods or services to the Fund.

IAS 24 requires entities to disclose key management personnel compensation. The Fund has identified key management personnel as the Director West Yorkshire Pension Fund and the Chief Executive of Bradford Council. The combined compensation for these officers, attributable to West Yorkshire Pension Fund, is £140k (2020/21 £143k). Details of the remuneration for these two posts are included in Note 33 of the City of Bradford Metropolitan District Council's statement of accounts.

#### Note 23. Nature and extent of risks arising from financial instruments

#### Risk and risk management

The Fund's primary long-term risk is that its assets will fall short of its liabilities (i.e. promised benefits payable to members). Therefore, the aim of investment risk management is to minimise the risk of an overall reduction in the value of the Fund and to maximise the opportunity for gains across the whole Fund portfolio. The Fund achieves this through asset diversification to reduce exposure to market risk (price risk, currency risk and interest rate risk) and credit risk to an acceptable level. In addition, the Fund manages its liquidity risk to ensure there is sufficient liquidity to meet the Fund's forecast cash flows. The Fund manages these investment risks as part of its overall pension Fund risk management programme.

The management of risk is set out in the Fund's Investment Strategy Statement, which in turn is driven by the Funding Strategy Statement. The full text of these statements can be found at the end of this document and also at: <a href="https://www.wypf.org.uk/publications/policy-home/wypf-index/investment-strategy-statement/">https://www.wypf.org.uk/publications/policy-home/wypf-index/investment-strategy-statement/</a>

And

https://www.wypf.org.uk/publications/policy-home/wypf-index/funding-strategy-statement/

The investment strategy is managed by the Investment Advisory Panel, whose responsibility it is to ensure that the Fund's investment portfolio, which is managed in-house, agrees with policy and strategy with regard to asset allocation.

The Fund routinely monitors all risks in accordance with the Fund's risk management strategy.

#### a) Market risk

Market risk is the risk of loss from fluctuations in equity and commodity prices, interest and foreign exchange rates and credit spreads. The Fund is exposed to market risk from its investment activities, particularly through its equity holdings. The level of risk exposure depends on market conditions, expectations of future price and yield movements and the asset mix.

The objective of the Fund's risk management strategy is to identify, manage and control market risk exposure within acceptable parameters, whilst optimising the return.

In general, excessive volatility in market risk is managed through the diversification of the portfolio in terms of geographical and industry sectors and individual securities. To mitigate market risk, the Fund and its investment advisors undertake appropriate monitoring of market conditions and benchmark analysis.

The Fund's asset holdings are spread across more than 800 UK companies, and almost 1,000 overseas companies, and a range of unit trusts and managed funds.

Risk is controlled by reviewing on a continuous basis the risk attached to the Fund's asset allocation relative to the fund-specific benchmark, to ensure that any major divergence from the benchmark is acceptable.

Custodian risk is controlled through continuous monitoring and periodic review of the custodial arrangements.

Risk is also monitored in relation to the funding position of the Fund and the investment requirements that flow from it, in conjunction with the Fund's actuary.

Counter-party and cash management risk is controlled by the in-house investment management team through the setting of appropriate limits for exposure with any individual organisation.

#### b) Price risk

Price risk represents the risk that the value of a financial instrument will fluctuate as a result of changes in market prices (other than those arising from interest rate risk or foreign exchange risk), whether those changes are caused by factors specific to the individual instrument or its issuer or factors affecting all such instruments in the market.

The Fund is exposed to share price risk. This arises from investments held by the fund for which the future price is uncertain. All securities investments present a risk of loss of capital. The maximum risk resulting from financial instruments is determined by the fair value of the financial instruments.

The Fund's investment managers mitigate this price risk through diversification. The selection of securities and other financial instruments is monitored by the fund to ensure it is within limits specified in the Fund's investment strategy.

## Price risk - sensitivity analysis

Potential price changes are determined based on the observed historical volatility of asset class returns. Riskier assets such as equities will display greater potential volatility than bonds for example, so the overall outcome will depend largely on asset allocation. The Fund has determined that the following movements in market price risk are reasonably possible for the 2021/22 reporting period.

	2021-22	2020-21
Asset type	Potential market	Potential market
Addet type	movement +/- (%pa)	movement +/- (%pa)
UK bonds	1.3	7.0
Overseas bonds	0.3	5.8
UK index-linked	5.9	0.9
Overseas index-linked	5.9	0.9
UK equities	12.2	31.2
Overseas equities	8.1	39.3
Pooled funds UK equities	12.2	31.2
Pooled funds overseas Equities	12.2	39.3
Pooled funds UK properties	18.6	1.7
Pooled funds overseas properties	18.6	1.7
Pooled funds UK hedge fund	17.8	11.2
Pooled funds UK private equities	34.9	5.4
Pooled funds overseas private equities	34.9	5.4
Pooled funds UK private equity infrastructure	12.9	0.8
Pooled funds overseas private equity infrastructure	12.9	0.8
Direct property	10.1	16.6
Cash certificate of deposits	0.5	1.5
Cash bank	0.5	1.5
Other investment assets	0.5	1.5
Other investment liabilities	0.5	1.5

Asset type	Value as at	Value as at
	31-Mar-22	31-Mar-21
	£000	£000
UK bonds	911,984	991,700
Overseas bonds	490,836	324,111
UK index-linked	659,908	645,331
Overseas index-linked	96,032	89,788
UK equities	4,902,166	4,453,871
Overseas equities	5,965,276	5,544,937
Pooled funds UK equities	546,390	586,529
Pooled funds overseas Equities	579,570	633,687
Pooled funds UK properties	610,566	529,604
Pooled funds overseas properties	86,722	76,419
Pooled funds UK hedge fund	124,360	105,58
Pooled funds UK private equities	832,312	676,46
Pooled funds overseas private equities	438,729	371,53
Pooled funds UK private equity infrastructure	868,183	639,40
Pooled funds overseas private equity infrastructure	164,463	83,51
Direct property	7,350	7,300
Cash certificate of deposits	556,926	422,003
Cash bank	6,230	41,592
Other investment assets	61,580	58,153
Other investment liabilities	-43	-13,990
Total Investment Assets	17,909,540	16,267,534

This can then be applied to the period end asset mix as follows:

Asset type	Value as at	Percentage	Value on	Value on
		change	increase	decrease
	31-Mar-22			
	£000	%	£000	£000
UK bonds	911,984	1.30	923,840	900,128
Overseas bonds	490,836	0.30	492,309	489,363
UK index-linked	659,908	5.90	698,843	620,973
Overseas index-linked	96,032	5.90	101,698	90,366
UK equities	4,902,166	12.20	5,500,230	4,304,102
Overseas equities	5,965,276	8.10	6,448,463	5,482,089
Pooled funds UK equities	546,390	12.20	613,050	479,730
Pooled funds overseas Equities	579,570	12.20	650,278	508,862
Pooled funds UK properties	610,566	18.60	724,131	497,001
Pooled funds overseas properties	86,722	18.60	102,852	70,592
Pooled funds UK hedge fund	124,360	17.80	146,496	102,224
Pooled funds UK private equities	832,312	34.90	1,122,789	541,835
Pooled funds overseas private equities	438,729	34.90	591,845	285,613
Pooled funds UK private equity infrastructure	868,183	12.90	980,179	756,187
Pooled funds overseas private equity infrastructure	164,463	12.90	185,679	143,247
Direct property	7,350	10.10	8,092	6,608
Cash certificate of deposits	556,926	0.50	559,711	554,141
Cash bank	6,230	0.50	6,261	6,199
Other investment assets	61,580	0.50	61,888	61,272
Other investment liabilities	-43	0.50	-43	-43
Total Investment Assets	17,909,540		19,918,591	15,900,489

Asset type	Value as at	Percentage change	Value on increase	Value on decrease
	31-Mar-21	· ·		
	£000	%	£000	£000
UK bonds	991,700	7.00	1,061,119	922,281
Overseas bonds	324,111	5.80	342,909	305,313
UK index-linked	645,331	0.90	651,139	639,523
Overseas index-linked	89,788	0.90	90,596	88,980
UK equities	4,453,871	31.20	5,843,479	3,064,263
Overseas equities	5,544,937	39.30	7,724,097	3,365,777
Pooled funds UK equities	586,529	31.20	769,526	403,532
Pooled funds overseas Equities	633,687	39.30	882,726	384,648
Pooled funds UK properties	529,604	1.70	538,607	520,601
Pooled funds overseas properties	76,419	1.70	77,718	75,120
Pooled funds UK hedge fund	105,585	11.20	117,411	93,759
Pooled funds UK private equities	676,465	5.40	712,994	639,936
Pooled funds overseas private equities	371,534	5.40	391,597	351,471
Pooled funds UK private equity infrastructure	639,404	0.80	644,519	634,289
Pooled funds overseas private equity infrastructure	83,511	0.80	84,179	82,843
Direct property	7,300	16.60	8,512	6,088
Cash certificate of deposits	422,003	1.50	428,333	415,673
Cash bank	41,592	1.50	42,216	40,968
Other investment assets	58,153	1.50	59,025	57,281
Other investment liabilities	-13,990	1.50	-14,200	-13,780
Total Investment Assets	16,267,534		20,456,502	12,078,566

## c) Interest rate risk

The Fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments are subject to interest rate risks, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The fund's interest rate risk is routinely monitored by the council and its investment advisors in accordance with the fund's risk management strategy, including monitoring the exposure to interest rates and assessment of actual interest rates against the relevant benchmarks.

The fund's direct exposure to interest rate movements as at 31 March 2022 and 31 March 2021 are set out below. These disclosures present interest rate risk based on the underlying financial assets at fair value.

At 31 March 2021	Asset type	At 31 March 2022
£000		£000£
1,315,811	Bonds	1,402,820
422,003	Cash deposits	556,926
41,592	Cash at bank	6,230
1,779,406	Total	1,965,976

## Interest rate risk - sensitivity analysis

The Fund recognises that interest rates can vary and can affect both income to the Fund and the value of the net assets available to pay benefits. The assumed interest rate volatility is 100 basis point (BPS) per annum.

The analysis that follows assumes that all other variables, in particular exchange rates, remain constant and shows the effect in the year on the net assets available to pay benefits of a +/- 100 BPS change in interest rates.

Asset type	Value at	Value on Increase	Value on decrease
	31 March 2022	+100BPS	-100BPS
	£000	£000	£000
Bonds	1,402,820	1,416,848	1,388,792
Cash deposits	556,926	562,495	551,357
Cash at bank	6,230	6,292	6,168
Total change in assets available	1,965,976	1,985,635	1,946,317
Accet type	Value at	Value on	Value on
Asset type	31 March 2021	Increase	decrease
		+100BPS	-100BPS
	£000	£000	£000
Bonds	1,315,811	1,328,969	1,302,653
Cash deposits	422,003	426,223	417,783
Cash at bank	41,592	42,008	41,176
Total change in assets available	1,779,406	1,797,200	1,761,612

## d) Currency risk

Currency risk represents the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The Fund is exposed to currency risk on financial instruments that are denominated in any currency other than the functional currency of the Fund (GBP). The Fund holds both monetary and non-monetary assets denominated in currencies other than GBP.

The following tables summarise the Fund's currency exposure as at 31 March 2022 and 31 March 2021:

Currency exposure - asset type	Value as at 31 <sup>st</sup> March 2022 £000	Value as at 31 <sup>st</sup> March 2021 £000
Overseas bonds	490,836	324,111
Overseas index-linked	96,032	89,788
Overseas equities	5,965,276	5,544,937
Pooled funds overseas Equities	579,570	633,687
Pooled funds overseas properties	86,722	76,419
Pooled funds overseas private equities	438,729	371,534
Pooled funds overseas private equity infrastructure	164,463	83,511
Total overseas assets	7,821,628	7,123,987

## Currency risk - sensitivity analysis

Following analysis of historical data the Fund considers the likely volatility associated with foreign exchange rate movements to be 6.0%, (2020/21 6.0%). A 6.0% strengthening / weakening of the pound against the various currencies in which the Fund holds investments would decrease/increase the net assets available to pay benefits as follows.

Asset type	Value at 31 Mar 22 £000	Value on increase £000	Value on decrease £000
Overseas bonds	490,836	520,286	461,386
Overseas index-linked	96,032	101,794	90,270
Overseas equities	5,965,276	6,323,193	5,607,359
Pooled funds overseas Equities	579,570	614,344	544,796
Pooled funds overseas properties	86,722	91,925	81,519
Pooled funds overseas private equities	438,729	465,053	412,405
Pooled funds overseas private equity infrastructure	164,463	174,331	154,595
Total overseas assets	7,821,628	8,290,926	7,352,330

Asset type	Value at 31 Mar 21 £000	Value on increase £000	Value on decrease £000
Overseas bonds	324,111	343.558	304,664
	,	343,336	,
Overseas index-linked	89,788	95,175	84,401
Overseas equities	5,544,937	5,877,633	5,212,241
Pooled funds overseas Equities	633,687	671,708	595,666
Pooled funds overseas properties	76,419	81,004	71,834
Pooled funds overseas private equities	371,534	393,826	349,242
Pooled funds overseas private equity infrastructure	83,511	88,522	78,500
Total overseas assets	7,123,987	7,551,426	6,696,548

#### e) Credit risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the Fund's financial assets and liabilities.

The selection of high quality counterparties, brokers and financial institutions minimises credit risk that may occur through the failure to settle a transaction in a timely manner.

The credit risk connected with stock lending is managed by holding collateral with a greater value than the amount of stock lent out at any one time. In addition, the Fund is fully indemnified by our financial securities custodian on stock lending activities. Stock lending and the associated collateral at the year-end are detailed in note 17c.

## f) Liquidity risk

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Fund therefore takes steps to ensure there are adequate cash resources available to meet its commitments. This will particularly be the case for cash, from the cashflow matching mandates from the main investment strategy to meet pensioner payroll costs, and also cash to meet investment commitments.

#### Note 24. Contractual commitments

At 31 March 2022 the West Yorkshire Pension Fund had the following un-drawn commitments:

	Investment value at 31 <sup>st</sup> March 2022	Un-drawn commitments
	£m	£m
Private equity	2,283	1,315
Property funds	718	57
Total	3,001	1,372

At 31st March 2021 the West Yorkshire Pension Fund had the following un-drawn commitments:

	Investment value at 31 <sup>st</sup> March 2021	Un-drawn commitments
	£m	£m
Private equity	1,771	1,237
Property funds	606	76
Total	2,377	1,313

Undrawn commitments relate to outstanding call payments due on unquoted limited partnership funds held in private equity, property and infrastructure parts of the portfolio. The amounts 'called' by these funds are irregular in both size and timing over a period of between four and six years from the date of each original commitment.

## Note 25. Accounting Developments

Accounting standards that have been issued before 1 January 2021 but not yet adopted by the CIPFA code of practice on local authority accounting and consequently are not yet adopted by the fund is provided below:

• The introduction of IFRS 16 (Leasing), has been deferred to 2022-23. In line with para 3.3.4.3 of the Code.

The introduction of, and amendments to, the above accounting standards is not expected to have a material impact on this financial statement in the period of initial application.

#### Note 26. Investment Strategy Statement

The West Yorkshire Pension Fund has prepared an Investment Strategy Statement (ISS) published under Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016. The Fund has also prepared a Funding Strategy Statement (FSS) in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013. Full details of the ISS and the FSS are included in this report and are available on the Fund's website <a href="https://www.wypf.org.uk/publications/policy-home/wypf-index/investment-strategy-statement/">https://www.wypf.org.uk/publications/policy-home/wypf-index/investment-strategy-statement/</a>

## Note 27. List of Participating Employers Contributing to the Fund

In 2021/22 463 employers paid contributions into the Fund, at the end of the year there were 433 employers with active members.

PARTICIPATING EMPLOYERS			
BRADFORD M.D.C	FOXHILL PRIMARY SCHOOL	OUTWOOD PRIMARY ACADEMY KIRKHAMGATE	
CALDERDALE M.B.C	FREESTON ACADEMY	OUTWOOD PRIMARY ACADEMY LEDGER LANE	
KIRKLEES M.C	FUTURE CLEANING SERVICES LIMITED (CALDER HIGH)	OUTWOOD PRIMARY ACADEMY LOFTHOUSE GATE	
LEEDS CITY COUNCIL	GOLCAR JUNIOR INFANTS AND NURSERY SCHOOL	OUTWOOD PRIMARY ACADEMY NEWSTEAD GREEN	
WAKEFIELD M.D.C	GREAT HEIGHTS ACADEMY TRUST	OUTWOOD PRIMARY ACADEMY PARK HILL	
ABBEY MULTI ACADEMY TRUST	GREENHEAD SIXTH FORM COLLEGE	OWLCOTES MULTI ACADEMY TRUST	
ABSOLUTELY CATERING LIMITED (BATLEY MAT)	GROUNDWORK LEEDS	PADDOCK JUNIOR INFANT AND NURSERY SCHOOL	
ABSOLUTELY CATERING LTD (BGS)	GROUNDWORK WAKEFIELD	PARK LANE LEARNING TRUST	
ACCOMPLISH MAT	GROVE HOUSE PRIMARY SCHOOL	PENNINE ACADEMIES YORKSHIRE	
ACCORD MULTI ACADEMY TRUST	GUISELEY INFANTS	PINNACLE (W Y POLICE)	
ACKWORTH PARISH COUNCIL	GUISELEY SCHOOL	PINNACLE FM LIMITED (KIRKLEES)	
ACTIVE CLEANING LTD (CROFTON ACADEMY)	HALIFAX OPPORTUNITIES TRUST (CALDERDALE)	PINNACLE FM LTD	
ADDINGHAM PARISH COUNCIL	HANSON SCHOOL	POLARIS M.A.T	
ADEL ST JOHN THE BAPTIST C E (V A) PRIMARY SCHOOL	HAWKSWORTH C E (VA) PRIMARY SCHOOL	PONTEFRACT ACADEMIES TRUST	
AFFINITY TRUST	HEBDEN ROYD TOWN COUNCIL	POOL PARISH COUNCIL	
AIREBOROUGH LEARNING PARTNERSHIP TRUST	HECKMONDWIKE GS ACADEMY TRUST	POSSABILITIES CIC	
ALDER TREE PRIMARY ACADEMY (WRAT)	HECKMONDWIKE PRIMARY SCHOOL	PRIESTLEY ACADEMY TRUST	
ALL SAINTS C E J & I SCHOOL	HEMSWORTH TOWN COUNCIL	PRIMROSE LANE PRIMARY FOUNDATION SCHOOL	
ALL SAINTS RICHMOND HILL CHURCH OF ENGLAND PRIMARY SCHOOL	HEPWORTH GALLERY TRUST	PROGRESS TO CHANGE (CARDIGAN HOUSE)	
AMEY COMMUNITY LTD BRADFORD BSF PHASE 2 FM SERVICES	HF TRUST LIMITED	PROGRESS TO CHANGE (RIPON HOUSE)	

MANY COMMUNITY CET PAS EMPCES LTD PARKETERS IN HILL COST FACADEMY  PUESSY SOUTH PROVIDENCE SERVICES LTD PARKETERS IN HILL COST FACADEMY  APPEAD ARRONG (USE INTERTO  APPEAD ARRONG (USE INTERTO)  HOW Y FAMILY CATHOLIC (NA) PRIMARY SCHOOL  ARRAMAN ELIMITED (ERESINHAD COLLERS)  HOW Y THIN ITY PRIMARY CC DE A CADDIMY  RED NOT ELEMINOR TRUST I INABROGRATH IN HIR]  ARRONG (USE INTERTO)  ARRONG (USE INTERED ARRONG INTERTO)  ARRONG (USE INTERED ARRONG INTERTO)  ARRONG (USE INTERED ARRONG INTERED			
APPERS PRINCES TO LONG ACADEMY HOLME VALLEY PRINCE COUNCIL ARAMANIC LIMITED HINY FAMILY CATHOLIC (DA) PRINAMY SCHOOL RAMANICAL MINITED HINY FAMILY CATHOLIC (DA) PRINAMY SCHOOL RAMANICAL MINITED HOLY TRAINTY PRINAMY SCHOOL RED THE LEARNING THUST GHARDOATE HR HUR) ACADIS (UN) TID  HORRIBRY REGIONE C. I AND SCHOOL ASPENS SERVICES TO HORRIBRY REGION C. I AND SCHOOL ASPENS SERVICES TO LONG SCHOOL AND SCHOOL ASPENS SERVICES TO LONG SCHOOL ASPENS SERVICES TO LONG SCHOOL AND SCHOOL ASPENS SERVICES TO LONG SCHOOL ASPENS SERVICES T	AMEY COMMUNITY LTD FM SERVICES	HILL TOP FIRST SCHOOL	PUDSEY GRANGEFIELD SCHOOL
ANCHORN CHARLOUGH LIGHTLD ACADEMY HONDIAN ANCHORNO HONDIA	AMEY INFRASTRUCTURE SERVICES LTD (WAKEFIELD)	HILLCREST ACADEMY	PUDSEY SOUTHROYD PRIMARY SCHOOL TRUST
ARAMARE LIMITED HOLY PAMILY CATHOLIC (VA) PRIMARY SCHOOL RANDON PARISH COUNCIL RECORD RECOR	APCOA PARKING (UK) LIMITED		QUEENSWAY PRIMARY
ARAMARK LIMITED (GREENHEAD COLLEGE) HOLY TRINITY PRIMARY C OF E ACADEMY RED RITE LEARNING TRUST (MERICATE HR HUR) HORBURY ACADEMY RED RITE LEARNING TRUST (MERICATE HR HUR) ARTS COUNCIL RIGIDAND HORBURY REDGEC EL AND I SCHOOL REFEV HILL PRIMARY SCHOOL ASPENS SERVICES LTD HORBURY REDGEC EL AND I SCHOOL ASPENS SERVICES LTD (PARTETIN ACADEMY) HORSTORTH SCHOOL ACADEMY HORSTORTH SCHOOL ACADEMY HORSTORTH TOWN COUNCIL ASPENS SERVICES LTD (PARTETIN ACADEMY) HUGH CALTESKLE RIGHT (MER) HUGH CALTESKLE	APPLETON ACADEMY	HOLME VALLEY PARISH COUNCIL	RAINBOW PRIMARY LEADERSHIP ACADEMY
ARCADIS (UNIL 11D HORBURY ACADEMY  ARTS COUNCIL ENGLAND  HORBURY SKIDGE CE I AND SCHOOL  REEVY HILL PRIMARY SCHOOL  ASPENS SERVICES LTD  APPENS SERVICES LTD  APPENS SERVICES LTD  APPENS SERVICES LTD (DASIS ACADEMY)  HORSTORTH TOWN COUNCIL  APPENS SERVICES LTD (DASIS ACADEMY)  ASPENS SERVICES LTD (DASIS ACADEMY)  HORSTORTH TOWN COUNCIL  APPENS SERVICES LTD (DASIS ACADEMY)  APPENS SERVICES LTD (DASIS ACADEMY)  HORSTORTH TOWN COUNCIL  BATTLEY GRAMMAR SCHOOL (BATTLY M.A.T.)  MACAT EDUCATION MULTI ACADEMY TRUST  BESTOR HILLS FLUKES C PRIMARY SCHOOL  HORSTORTH TRUST  HO	ARAMARK LIMITED	HOLY FAMILY CATHOLIC (VA) PRIMARY SCHOOL	RAWDON PARISH COUNCIL
ARTS COUNCIL ENGLAND HORRUPY BRIDGE CE I AND I SCHOOL ASPENS SERVICES LTD NORSFORTH SCHOOL ACADEMY RENEWI UX SERVICES LIMITED ASPENS SERVICES LTD (APPETON ACADEMY) HORSFORTH SCHOOL ACADEMY ASPENS SERVICES LTD (APPETON ACADEMY) HORSFORTH SCHOOL ACADEMY HORS SERVICES LTD (APPETON ACADEMY) HORSFORTH SCHOOL ACADEMY HORS SERVICES LTD (APPETON ACADEMY) HORSFORTH SCHOOL ACADEMY HORSE COMMUNITY BEAREST SOCIETY TO HUBOR SERVED NEW COLLEGE ROTHWELL STANDAM SERVET (MAST ACADEMY TRUST) HUMANIKING CHARITY (LEEDS) ROTTOS ACADEMY TRUST HUMANIK	ARAMARK LIMITED (GREENHEAD COLLEGE)	HOLY TRINITY PRIMARY C OF E ACADEMY	RED KITE LEARNING TRUST (HARROGATE HR HUB)
ASPENS SERVICES LTD (APPLETON ACADEMY) HORSFORTH SCHOOL ACADEMY RENNWI LIK SERVICES LIMITED  ASPENS SERVICES LTD (APPLETON ACADEMY) HORSFORTH TOWN COUNCIL  ASPENS SERVICES LTD (APPLETON ACADEMY) HORSFORTH TOWN COUNCIL  ASPENS SERVICES LTD (ADASS ACADEMY)  ASPERS COMMINITY SENSETT SOLETY LTD  HUDDERSFELD ROW COLLEGE  ROTHWELL ST MARKS CATHOLIC CVAJ PRIMARY SCHOOL  ASPERS COMMINITY SENSETT SOLETY LTD  HUDDERSFELD ROW COLLEGE  ROTHWELL ST MARKS CATHOLIC CVAJ PRIMARY SCHOOL  ASPERS COMMINITY SENSETT SOLETY LTD  HUMANAKORD CHARITY LIESTDS  BALLDON TOWN COUNCIL  BANKSIDE PRIMARY SCHOOL  HUTCHISON CATTERING LTD (GUISELEY SCHOOL)  ROYDS ACADEMY  ROYDS	ARCADIS (UK) LTD	HORBURY ACADEMY	RED KITE LEARNING TRUST (LEEDS EAST HR HUB)
ASPENS SERVICES LTD (APPLETON ACADEMY)  ASPENS SERVICES LTD (DASS ACADEMY)  MORTON HOUSING ASSOCIATION (BRADFORD)  ASPENS SERVICES LTD (DASS ACADEMY)  MORTON HOUSING ASSOCIATION (BRADFORD)  ASPENS SERVICES LTD (DASS ACADEMY)  HUDGARSTHELD NOW COLLEGE  ROTHWELL ST MARKS CATHOLIC (A) PRIMARY SCHOOL  ASPENS HER GROUP LTD  ASPENS HER GROUP LTD  HUDGARSTHELD NOW COLLEGE  ROTHWELL ST MARKS CATHOLIC (A) PRIMARY SCHOOL  ASPENS HER GROUP LTD  HUDGART ST HOUSE CE (FV) PRIMARY SCHOOL  ATALIAN SERVEST (MARK TACADEMY TRUST)  HUMANNIND CHARITY (LEEDS)  ROYDS ACADEMY  ROYDS LEANING TRUST  BANKSIDE PRIMARY SCHOOL  HUTCHISON CATERING LTD (GUISELEY SCHOOL)  BRUFORD PARK PRIMARY  BRADEN PRIMARY FOLINDATION SCHOOL  15 S FACILITY SERVICES LTD  RYBERN VALLEY HIGH SCHOOL  BASETERALL ENGLAND  15 S MEDICLIAAN LTD  RYBERN VALLEY HIGH SCHOOL  BASETERAL ENGLAND  15 S MEDICLIAAN LTD  RYBERN VALLEY HIGH SCHOOL  RYHLL PARISH COUNCIL  RYHLL PARISH COUNCIL  RYHLL PARISH COUNCIL  RYBERN VALLEY HIGH SCHOOL  RYBER	ARTS COUNCIL ENGLAND	HORBURY BRIDGE CE J AND I SCHOOL	REEVY HILL PRIMARY SCHOOL
ASPER SERVICES LTD (CASIS ACADEMY)  HORTON HOUSING ASSOCIATION (BRADFORD)  ROOMS NEST ACADEMY  ASPIRE COMMUNITY BENEFIT SOCIETY LTD  HUGDERSFIELD NEW COLLEGE  ROTHWELL ST MARYS CATHOLIC (VA) PRIMARY SCHOOL  ASPIRE IGEN GROUP LTD  HUGH GAITSKELL PRIMARY SCHOOL TRUST  ROUNDHAY ST JOHNS C E (VA) PRIMARY SCHOOL  ATALANA SERVEST (MAST ACADEMY TRUST)  HUMANNING CHARITY (LEEDS)  ROYDS ACADEMY  ROYDS LEARNING TRUST  BAILDON TOWN COUNCIL  HUTCHISON CHERING LTD (GUISELEY SCHOOL)  ROYDS LEARNING TRUST  SCHOOL  BANKSIDE PRIMARY SCHOOL  HUTCHISON CATERING LTD (GUISELEY SCHOOL)  ROYDS LEARNING TRUST  ROYDS LEARNING TRUST  BANKSIDE PRIMARY SCHOOL  BARRAFDOS ASRIFAM GRANGE PRISON  IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BARRAFDOS ASRIFAM GRANGE PRISON  IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BARRAFDOS ASRIFAM GRANGE PRISON  IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BARRAFDOS ASRIFAM GRANGE PRISON  IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BARRAFDOS ASRIFAM GRANGE PRISON  IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BARRAFDOS ASRIFAM GRANGE PRISON  IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BARRAFDOS ASRIFAM GRANGE PRISON  IS S MEDICLEAN TO SCHOOL  RYBURN VALLEY HIGH SCHOOL  BARRAFOR TRUST  SALEDIAN TRUST  SALEDIAN TRUST  SALEDIAN NOW ACADEMY TRUST  SALEDIAN TRUST  SECRETOR PRIMARY SCHOOL  BESTON HILL ST LUKES C E PRIMARY SCHOOL  INSTER PARTNERSHIP MULTI ACADEMY TRUST  SECRETOR PRIMARY TRUST  BEESTON HILL ST LUKES C E PRIMARY SCHOOL  INFERENCE PROJECT SALEDIAN TRUST  SHIBBEN HEAD BUSINERY AUTHORITY  SHARE MULTI ACADEMY  SHARE MULTI ACADEMY  SHIBBEN HEAD PRIMARY ACADEMY  RESPONDED FITE SHOW CATHOLIC ACADEMY TRUST  RESPONDED FITE	ASPENS SERVICES LTD	HORSFORTH SCHOOL ACADEMY	RENEWI UK SERVICES LIMITED
ASPIRE COMMUNITY BENEFIT SOCIETY LTD  HUDGESFIELD NEW COLLEGE  ROTHWELL ST MARYS CATHOLIC (VA) PRIMARY SCHOOL  ASPIRE-JOEN GROUP LTD  HUGH GAITSKELL PRIMARY SCHOOL  TATALIAN SERVEST (MAST ACADEMY TRUST)  HUMANIKIND CHARITY (LLEDS)  ROYDS ACADEMY  RUFGORD ACADEMY  RUFGORD ACADEMY  RUFGORD ACADEMY  RUFGORD ACADEMY  RUFGORD ACADEMY  RUFGORD ACADEMY ROUST  ROYDS ACADEMY  RUFGORD ACADEMY TRUST  ROYDS ACADEMY  RUFGORD ACADEMY TRUST  ROYDS ACADEMY  RUFGORD ACADEMY TRUST  RUFGORD ACADEMY  RUFGORD ACADEMY TRUST  RUFGORD ACADEMY TRUST  RUFGORD ACADEMY  RUFGORD ACAD	ASPENS SERVICES LTD (APPLETON ACADEMY)	HORSFORTH TOWN COUNCIL	RODILLIAN MULTI ACADEMY TRUST
ASPIRE-IBEN GROUP LITD  HUGH GAITSEELL PRIMARY SCHOOL TRUST  ROUNDHAY ST JOHNS C E (VA) PRIMARY SCHOOL ATALIAN SERVEST (MAST ACADEMY TRUST)  HUMAINT ST JOSEPHS CATHOLIC (VA) PRIMARY SCHOOL SHUNSLET ST JOSEPHS CATHOLIC (VA) PRIMARY ROYDS ACADEMY ROYDS ROYDS ACADEMY ROYDS ROYDS ACADEMY ROYDS ROYDS ACADEMY ROYDS ROYDS ACADEMY TRUST ROYDS ACADEMY TRUST ROYDS ACADEMY ROYDS ROYDS A	ASPENS SERVICES LTD (OASIS ACADEMY)	HORTON HOUSING ASSOCIATION (BRADFORD)	ROOK'S NEST ACADEMY
ATALIAN SERVEST (MAST ACADEMY TRUST)  BAILDON TOWN COUNCIL  SHANSIDE PRIMARY SCHOOL  HUTCHSON CATERING ITD (GUISELEY SCHOOL)  RUFFORD PARK PRIMARY  ROYDS LEARNING TRUST  SCHOOL  BANKSIDE PRIMARY FOUNDATION SCHOOL  IS S FACILITY SERVICES LID  RUSSELL HALL FIRST SCHOOL  BASSETABLE ENGLAND  ILIKEY PARSHS COUNCIL  BATELY MULTI ACADEMY TRUST  INCOMMUNITIES  BECKFOOT TRUST  INNOVATE SERVICES LID (ROSSELLAND TRUST)  BECKFOOT TRUST  INNOVATE SERVICES LID (ROSSELLAND TRUST)  BECKFOOT TRUST  INNOVATE SERVICES LID (ROSSELLAND TRUST)  BECSTON PRIMARY SCHOOL (RATEY M.A.T.)  INSPECT PRIMARY SCHOOL (RATEY M.A.T.)  BECKFOOT TRUST  INNOVATE SERVICES LID (ROSSELATES)  SCOUT ROAD ACADEMY TRUST  BECKFOOT TRUST  INTERACTION AND COMMUNICATION ACADEMY TRUST  SERVEST (R B G ACADEMY)  TRUST  BELE IS LEE TENANT MANAGEMENT ORG  INTERACTION AND COMMUNICATION ACADEMY  TRUST HIGH HARM;  BIO SERVICES  INTERSETVE (RACILIHES MANAGEMENT) LIT (Y.Y.Y.)  POLICE CLEANING CONTRACT)  BIO SERVICES  BINGLEY GRAMMAR SCHOOL  IRRA ACADEMY FEREVERSHAM BUJCATION TRUST)  BILESSED OF RETHS SHOW CATHOLIC ACADEMY TRUST  RESSED OF PITER SHOW CATHOLIC ACADEMY TRUST  BLESSED OF PITER SHOW CATHOLIC ACADEMY TRUST  RESSED OF PITER SHOW CATHOLIC ACADEMY TRUST  RESPONDED PITER SHOW CATHOLIC A	ASPIRE COMMUNITY BENEFIT SOCIETY LTD	HUDDERSFIELD NEW COLLEGE	ROTHWELL ST MARYS CATHOLIC (VA) PRIMARY SCHOOL
BALDON TOWN COUNCIL  BANKSIDE PRIMARY SCHOOL  HUTCHISON CATERING LTD (GUISELEY SCHOOL)  RUFFORD PARK PRIMARY  ROYDS LEARNING TRUST  RUSSELL HALL FIRST SCHOOL  BARNARDOS ASKHAM GRAINGE PRISON  IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BASKETBALL ENGLAND  RIKLEY PARISH COUNCIL  BATTLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  RECKFOOT TRUST  INCOMMUNITIES  SALTERLE ACADEMY TRUST  BECKFOOT TRUST  INNOVATE SERVICES LTD (CROSSFLATTS)  SCOUT ROAD ACADEMY  RUST HIGH PARISH COUNCIL  BESTON PRIMARY SCHOOL  RESTON PRIMARY SCHOOL  RESTON PRIMARY SCHOOL  RESTON PRIMARY SCHOOL  RESTON PRIMARY SCHOOL  RIKRACTION AND COMMUNICATION ACADEMY  TRUST  BIOLESELE TENANT MANAGEMENT ORG  RIKRACTION AND COMMUNICATION ACADEMY  TRUST HIGHER HARK)  BIOLESE FRANTH SCHOOL  RIKRACTION AND COMMUNICATION ACADEMY  TRUST HIGHER HARK  BIOLESE PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BIRSTALL PRIMARY ACADEMY  RUST HIGHER HARK  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BIRSTALL PRIMARY ACADEMY  RESSED PETER SHOW CATHOLIC ACADEMY TRUST  BLESSED PETER SHOW CATHOLIC ACADEMY TRUST  RESSED RESTON BOW PRIMARY ACADEMY  KEEIHAM PRIMARY SCHOOL  REPRODUCE CLEANING CONTRACT)  SHIPLEY TOWN COUNCIL  BIRSSED PETER SHOW CATHOLIC ACADEMY TRUST  RESPECT SHOW CATHOLIC ACADEMY TRUST  RESPECT SHOW CATHOLIC ACADEMY TRUST  RESPECT ON BROWN PRIMARY ACADEMY  RESIDENCE PRIMARY SCHOOL  SOUTH HERMALL TOWN COUNCIL  BRADFORD ACADEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALL TOWN COUNCIL  BRADFORD CALDEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALL TOWN COUNCIL  BRADFORD CALDEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALL TOWN COUNCIL  BRADFORD CALDEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALT WAS DOWN COUNCIL  BRADFORD CALDEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALT PRIMARY ACADEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALT PRIMARY ACADEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALT PRIMARY ACADEMY  KEEIHAM PRIMARY SCHOOL  SOUTH HERMALT PRIMARY SC	ASPIRE-IGEN GROUP LTD	HUGH GAITSKELL PRIMARY SCHOOL TRUST	ROUNDHAY ST JOHNS C E (VA) PRIMARY SCHOOL
BANKSIDE PRIMARY SCHOOL  BANKSIDE PRIMARY SCHOOL  BANKSIDE PRIMARY SCHOOL  BANKSIDE PRIMARY SCHOOL  BANKSIDE PRIMARY FOUNDATION SCHOOL  1 S S FACILITY SERVICES LTD  RUSSEL HALL FIRST SCHOOL  BANKARDOR A SKHAM GRANGE PRISON  1 S S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BANKARDOR A SKHAM GRANGE PRISON  ILKLEY PARISH COUNCIL  BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  IMPACT EDUCATION MULTI ACADEMY TRUST  BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  BATLEY MULTI ACADEMY TRUST  INCOMMUNITIES  SALTERLEE ACADEMY TRUST  BECKFOOT TRUST  INNOVATE SERVICES LTD (CROSSPLATTS)  SCOUT ROAD ACADEMY  BEESTON HILL STLUKES C E PRIMARY SCHOOL  INSPIRE PARTHERSHIP MULTI ACADEMY TRUST  SERVEST (B B G ACADEMY)  BEESTON PRIMARY TRUST  INTERSCITION AND COMMUNICATION ACADEMY  BELIE ISLE TENANT MANAGEMENT ORG  INTERSCITION AND COMMUNICATION ACADEMY  BID SERVICES  POLICE CLEANING CONTRACT]  BINGLEY GRAMMAR SCHOOL  IORA ACADEMY (FEVERSHAM EDUCATION TRUST)  BILD SERVICES  BIRSTAIL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BIRSTAIL PRIMARY ACADEMY  SHIPLEY TOWN COUNCIL  BIRSSED PETER SNOW CATHOLIC ACADEMY TRUST  BILSSED PETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  STUNGTON PARISH COUNCIL  BOOTHNOOP PRIMARY ACADEMY  KEICHAM PRIMARY SCHOOL  SOUTH HIENDEY PARISH COUNCIL  BOOTHNOOP PRIMARY ACADEMY  KHALSA SCIENCE ACADEMY  KHALSA SCIENCE ACADEMY  SOUTH BILDSALL TOWN COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH HIENDEY PARISH COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH HIENDEY PARISH COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMY  SOUTH PENNINE ACADEMY  SOUTH PENNINE ACADEMY  SOUTH PENNINE ACADEMY  SOUTH PENNINE A	ATALIAN SERVEST (MAST ACADEMY TRUST)	HUMANKIND CHARITY (LEEDS)	ROYDS ACADEMY
BARDSEY PRIMARY FOUNDATION SCHOOL  BARNARDOS ASKHAM GRANGE PRISON  IS S MEDICLEAN LITD  RYBURN VALLEY HIGH SCHOOL  BASKETBALL ENGLAND  ILKLEY PARISH COUNCIL  RYHILL PARISH COUNCIL  BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  IMPACT EDUCATION MULTI ACADEMY TRUST  BATLEY MULTI ACADEMY TRUST  INCOMMUNITIES  SALETLEE ACADEMY TRUST  BECKFOOT TRUST  INNOVATE SERVICES LITD (CROSSPLATTS)  SCOUT ROAD ACADEMY  BEESTON HILL ST LILKES C E PRIMARY SCHOOL  INSPIRE PARTNERSHIP MULTI ACADEMY TRUST  SEA FISH INDUSTRY AUTHORITY  BEELE SILE ISLE TENANT MANAGEMENT ORG  INTERACTION AND COMMUNICATION ACADEMY  SERVEST (B B G ACADEMY)  SHARE MULTI ACADEMY TRUST  BID SERVICES  INTERSERVE (FACILITIES MANAGEMENT) LITD (W Y  DOLICE CLEANING CONTRACT)  BIRDSEY GRAMMAR SCHOOL  IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED DETER SNOW CATHOLIC ACADEMY TRUST  BLESSED DETER SNOW CATHOLIC ACADEMY TRUST  REESED ACADEMY  KEELHAM PRIMARY SCHOOL  SHINARY ACADEMY  KEELHAM PRIMARY SCHOOL  BLESSED DETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  BLESSED PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  BLESSED PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  BLOTH ROBY PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  SOUTH BLESSED CARE UMITED  SKILLS FOR CARE LIMITED  SCHOOL SOUTH HIENDLEY PARISH COUNCIL  BRADFORD DIDCESAN ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIDCESAN ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD DIDCESAN ACADEMISE TRUST  KIRKBES COLEGE  KINGS SCIENCE ACADEMY  SOUTH PENNINE ACADEMISE  SOUTH FIRMS Y SCHOOL  SOUTH FIRMS Y SOUTH FIRMS Y SCHOOL  SOUTH FIRMS Y SCHOOL  SOUTH FIRMS Y SCHOO	BAILDON TOWN COUNCIL	` '	ROYDS LEARNING TRUST
BANNARDOS ASKHAM GRANGE PRISON  I IS S MEDICLEAN LTD  RYBURN VALLEY HIGH SCHOOL  BANKETBALL ENGLAND  ILKLEY PARISH COUNCIL  RYHILL PARISH COUNCIL  RYHILL PARISH COUNCIL  BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  IMPACT EDUCATION MULTI ACADEMY TRUST  SALENDINE NOOK ACADEMY TRUST  BATLEY MULTI ACADEMY TRUST  INCOMMUNITIES  SALTERLEE ACADEMY TRUST  BECKFOOT TRUST  INNOVATE SERVICES LTD (CROSSFLATTS)  SCOUT ROAD ACADEMY  BEESTON HILL ST LUKES C E PRIMARY SCHOOL  INSPIRE PARTNERSHIP MULTI ACADEMY TRUST  BEESTON PRIMARY TRUST  INTERACTION AND COMMUNICATION ACADEMY  SERVICES PRIMARY TRUST  BELLE ISLE TENANT MANAGEMENT ORG  TRUST (FINISH PARIS)  BID SERVICES  POLICE (LEANING CONTRACT)  BID SERVICES  POLICE (LEANING CONTRACT)  BID SERVICES  BINGLEY GRAMMAR SCHOOL  IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  SOUTH ON PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  SOUTH ON PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  SOUTH NEAD REIMITED  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SOUTH ON PRIMARY ACADEMY  KEIGHLEY TOWN COUNCIL  SODEXO LTD  SOUTH HENDELY PARISH COUNCIL  SOUTH PERNINE ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HIRDLEY PARISH COUNCIL  SOUTH PERNINE ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HENDELY PARISH COUNCIL  SOUTH PERNINE ACADEMY  SOUTH PERNINE ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH PERNINE ACADEMY  SOUTH PERNINE SCHOOL  SOUTH PERNINE SCHOOL  SOUTH PERNINE SCHOOL  SOUTH PERNINE ACADEMY  SOUTH PERNINE SCHOOL  SOUTH	BANKSIDE PRIMARY SCHOOL	HUTCHISON CATERING LTD (GUISELEY SCHOOL)	RUFFORD PARK PRIMARY
BASKETBALL ENGLAND  ILKLEY PARISH COUNCIL  RYHILL PARISH COUNCIL  BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  MFACT EDUCATION MULTI ACADEMY TRUST  SALERDINE NOOK ACADEMY TRUST  BEATLEY MULTI ACADEMY TRUST  BECKFOOT TRUST  INCOMMUNITIES  SALTERLEE ACADEMY TRUST  BEESTON HILL ST LUKES C E PRIMARY SCHOOL  INSPIRE PARTNERSHIP MULTI ACADEMY TRUST  SERVEST (B B G ACADEMY)  SERVEST (B B G ACADEMY)  SHARE MULTI ACADEMY TRUST  BELIE ISLE TENANT MANAGEMENT ORG  INTERACTION AND COMMUNICATION ACADEMY  SHARE MULTI ACADEMY TRUST  BID SERVICES  INTERACTION AND COMMUNICATION ACADEMY  TRUST (HIGH PARK)  SHARE MULTI ACADEMY TRUST  SHARE MULTI ACADEMY  SHIBDEN HEAD PRIMARY ACADEMY  SHIBDEN HEAD PRIMARY ACADEMY  SHIBDEN HEAD PRIMARY ACADEMY  SHIPLEY COLLEGE  BIESSED PETER SNOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  REESED PETER SNOW CATHOLIC ACADEMY TRUST  (REELHAM PRIMARY SCHOOL  SILINGTON PARISH COUNCIL  SOUTH HIMBELL TOWN COUNCIL  BOOTHROYD PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  SOUTH HEMDLEY PARISH COUNCIL  BRADFORD ACADEMY  KILINGHALL PRIMARY SCHOOL  SOUTH HEMDLEY PARISH COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KING JAMES'S SCHOOL  SOUTH HENDLEY PARISH COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KING JAMES'S SCHOOL  KIRKLES ACTIVE LEISURE  SOUTH SERVICES UNTIFIED SPEN VAILLEY HIGH SCHOOL  BRADFORD DIOCESAN ACADEMIES TRUST  KIRKLES COLLEGE  SPIELTD	BARDSEY PRIMARY FOUNDATION SCHOOL	I S S FACILITY SERVICES LTD	RUSSELL HALL FIRST SCHOOL
BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)  MPACT EDUCATION MULTI ACADEMY TRUST  SALERDINE NOOK ACADEMY TRUST  BATLEY MULTI ACADEMY TRUST  BECKFOOT TRUST  INNOVATE SERVICES LTD (CROSSFLATTS)  SCOUT ROAD ACADEMY  BEESTON HILL ST LUKES C E PRIMARY SCHOOL  INSPIRE PARTNERSHIP MULTI ACADEMY TRUST  SERVEST (B B G ACADEMY)  SERVEST (B B G ACADEMY)  TRUST  BELLE ISLE TENANT MANAGEMENT ORG  INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK)  BID SERVICES  INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK)  BID SERVICES  INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK)  BID SERVICES  INTERACTION AND COMMUNICATION ACADEMY SHARE MULTI ACADEMY TRUST  BINGLEY GRAMMAR SCHOOL  IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)  BIRGLEY GRAMMAR SCHOOL  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY SHIPLEY TOWN COUNCIL  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  (CAUDEROLE)  BIRSTALL PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  SITLINGTON PARISH COUNCIL  SOESED CETER SNOW CATHOLIC ACADEMY TRUST  (KIRKLES)  KEEPMOAT PROPERTY SERVICES LIMITED  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SOUTH CHANGEMY  KHALSA SCIENCE ACADEMY  KHALSA SCIENCE ACADEMY  SOUTH ELMSALL TOWN COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKLES COLLEGE  KING JAMES'S SCHOOL  SOUTH HERNSLY AND MOORTHORPE TOWN COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKLES ACTIVE LEISURE  SOUTH SOUTH PRONING ACADEMY  SOUTH PENNING ACAD	BARNARDOS ASKHAM GRANGE PRISON	I S S MEDICLEAN LTD	RYBURN VALLEY HIGH SCHOOL
BATLEY MULTI ACADEMY TRUST  BECKFOOT TRUST  BECKFOOT TRUST  INNOWATE SERVICES LTD (CROSSFLATTS)  SCOUT ROAD ACADEMY  BEESTON HILL ST LUKES C E PRIMARY SCHOOL  INSPIRE PARTNERSHIP MULTI ACADEMY TRUST  SEA FISH INDUSTRY AUTHORITY  BELSTON PRIMARY TRUST  INTERACTION AND COMMUNICATION ACADEMY TRUST  BELLE ISLE TENANT MANAGEMENT ORG  INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK)  BID SERVICES  INTERSEVE (FACILITIES MANAGEMENT) LTD (W Y POLICE CLEANING CONTRACT)  BINGLEY GRAMMAR SCHOOL  IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BIESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  SITLINGTON PARISH COUNCIL  SKILLS FOR CARE LIMITED  SODENO TO THE MANARY ACADEMY  KEIGHLEY TOWN COUNCIL  SODEXO LTD  SODEXO LTD  SODEXO LTD  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD COLLEGE  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIDCESAN ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIDCESAN ACADEMIES TRUST  KIRKBURTON PARISH COUNCIL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIDCESAN ACADEMIES TRUST  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMY  SOUTH PENNINE ACADEMIES  BRADHAW PRIMARY SCHOOL  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMIES  SOUTH	BASKETBALL ENGLAND	ILKLEY PARISH COUNCIL	RYHILL PARISH COUNCIL
BECKFOOT TRUST INNOVATE SERVICES LTD (CROSSFLATTS) SCOUT ROAD ACADEMY BEESTON HILL ST LUKES C E PRIMARY SCHOOL INSPIRE PARTNERSHIP MULTI ACADEMY TRUST SEA FISH INDUSTRY AUTHORITY SERVEST (B B G ACADEMY) TRUST INTERACTION AND COMMUNICATION ACADEMY TRUST SELLE ISLE TENANT MANAGEMENT ORG INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK) SHARE MULTI ACADEMY TRUST SHARE MULTI ACADEMY TRUST SHIBDEN HEAD PRIMARY ACADEMY INTERACTION AND COMMUNICATION ACADEMY SHIBDEN HEAD PRIMARY ACADEMY SHIBDEN HEAD PRIMARY ACADEMY JOHN SMEATON ACADEMY (FEVERSHAM EDUCATION TRUST) SHIPLEY COULCEGE SHIRTLY PRIMARY ACADEMY JOHN SMEATON ACADEMY SHIPLEY TOWN COUNCIL  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST (KEELHAM PRIMARY SCHOOL SITLINGTON PARISH COUNCIL SCHEDALE) SHILLEY MANOR PRIMARY ACADEMY KEELHAM PRIMARY SCHOOL SCHILLEY TOWN COUNCIL SODEXO LTD  BOOTHROYD PRIMARY ACADEMY KEIGHLEY TOWN COUNCIL SODEXO LTD  BOOTHROYD PRIMARY ACADEMY KHALSA SCIENCE ACADEMY KHALSA SCIENCE ACADEMY SOUTH ELMSALL TOWN COUNCIL SOUTH HIENDLEY PARISH COUNCIL BRADFORD CICLEGE KING JAMES'S SCHOOL SOUTH HIENDLEY PARISH COUNCIL BRADFORD DIOCESAN ACADEMY KILLINGHALL PRIMARY SCHOOL SOUTH HIENDLEY PARISH COUNCIL BRADFORD DISTRICT CREDIT UNION KIRRUEES ACTIVE LEISURE SOUTH PENNINE ACADEMY SOUTH PENNINE ACADEMY SOUTH PENNINE ACADEMY SOUTH PENNINE ACADEMY KIRRUES ACTIVE LEISURE SOUTH PENNINE ACADEMY SOUTH PENNINE ACAD	BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.)	IMPACT EDUCATION MULTI ACADEMY TRUST	SALENDINE NOOK ACADEMY TRUST
BEESTON HILL ST LUKES CE PRIMARY SCHOOL  INSPIRE PARTNERSHIP MULTI ACADEMY TRUST  SER FISH INDUSTRY AUTHORITY  SERVEST (B B G ACADEMY)  TRUST  BELLE ISLE TENANT MANAGEMENT ORG  INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK)  SHARE MULTI ACADEMY TRUST  BID SERVICES  INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK)  SHARE MULTI ACADEMY TRUST  SHIBDEN HEAD PRIMARY ACADEMY TRUST  SHIBDEN HEAD PRIMARY ACADEMY  JOHN SMEATON ACADEMY (FEVERSHAM EDUCATION TRUST)  SHIPLEY COLLEGE  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  SODEXO LTD  SOUTH BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  SOUTH SHIPLEY TOWN COUNCIL  SOUTH BLESSED PETER SHOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  SOUTH BLESSED PETER SHOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  SOUTH SHIPLEY TOWN COUNCIL  SOUTH BLESSED PETER SHOW CATHOLIC ACADEMY  SHIPLEY TOWN COUNCIL  SOUTH BLESSED PETER SHOW CATHOLIC ACADEMY  SOUTH BLESSED PETER SHOW CATHOLIC ACADEMY  SOUTH SHIPLEY TOWN COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURSTON PARISH COUNCIL  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURSTON PARISH COUNCIL  SOUTH PENNINE ACADEMY	BATLEY MULTI ACADEMY TRUST	INCOMMUNITIES	SALTERLEE ACADEMY TRUST
BEESTON PRIMARY TRUST  INTERACTION AND COMMUNICATION ACADEMY TRUST  BELLE ISLE TENANT MANAGEMENT ORG  INTERACTION AND COMMUNICATION ACADEMY TRUST  BID SERVICES  INTERSERY (FACILITIES MANAGEMENT) LTD (W Y POUCE CLEANING CONTRACT)  BINGLEY GRAMMAR SCHOOL  IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  STILINGTON PARISH COUNCIL  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  KEELHAM PRIMARY SCHOOL  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SODEXO LTD  BOOTHROYD PRIMARY ACADEMY  KHALSA SCIENCE ACADEMY  KHALSA SCIENCE ACADEMY  SOUTH ELMSALL TOWN COUNCIL  BRADFORD ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HEINSALL TOWN COUNCIL  BRADFORD COLLEGE  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH FEINSALL TOWN COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH FEINSALL TOWN COUNCIL  BRADHAW PRIMARY SCHOOL  KIRKLEES ACTIVE LEISURE  SOUTH FEINSALL FRANGE TRUST  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  BRADHEY ST PETERS C OF E SCHOOL  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  BRIGHOUSE ACADEMY  KIRKLEES COLLEGE  SPIELTD	BECKFOOT TRUST	INNOVATE SERVICES LTD (CROSSFLATTS)	SCOUT ROAD ACADEMY
BELEISLE TENANT MANAGEMENT ORG  TRUST  BELLE ISLE TENANT MANAGEMENT ORG  TRUST (HIGH PARK)  BID SERVICES  BID SERVICES  INTERSERVE (FACILITIES MANAGEMENT) LTD (W Y POLICE CLEANING CONTRACT)  BINGLEY GRAMMAR SCHOOL  IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (KIRKLEES)  BOTHROYD PRIMARY ACADEMY  KEEPMOAT PROPERTY SERVICES LIMITED  SKILLS FOR CARE LIMITED  BOTHROYD PRIMARY ACADEMY  KHALSA SCIENCE ACADEMY  KHALSA SCIENCE ACADEMY  SOUTH BLEMSALL TOWN COUNCIL  BRADFORD ACADEMY  KILINGHAMP SCHOOL  BRADFORD COLLEGE  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMY  SOUTH PENNINE ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  BRADHAW PRIMARY SCHOOL  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  BRAMLEY ST PETERS C OF E SCHOOL  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  BRIGHOUSE ACADEMY  KIRKLEES COLLEGE  SPIELTD	BEESTON HILL ST LUKES C E PRIMARY SCHOOL	INSPIRE PARTNERSHIP MULTI ACADEMY TRUST	SEA FISH INDUSTRY AUTHORITY
BELLE ISLE IENANI MANAGEMENI ORG  TRUST (HIGH PARK)  BIO SERVICES  POLICE CLEANING CONTRACT)  BINGLEY GRAMMAR SCHOOL  IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (KIRKLEES)  BOLTON BROW PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  BOOTHROYD PRIMARY ACADEMY  KILLINGHALL PRIMARY SCHOOL  BRADFORD ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD OLLEGE  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIOCESAN ACADEMISES TRUST  KINGS SCIENCE ACADEMY  SOUTH PENNINE ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMIS  BRADSHAW PRIMARY SCHOOL  KIRKLEES ACTIVE LEISURE  SOUTHFIELD GRANGE TRUST  BRAMLEY ST PETERS C OF E SCHOOL  KIRKLEES COLLEGE  SPIE LTD	BEESTON PRIMARY TRUST		SERVEST (B B G ACADEMY)
BIRSTALL PRIMARY ACADEMY  BIRSTALL PRIMARY ACADEMY (FEVERSHAM EDUCATION TRUST)  BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (KIRKLEES)  BOLTON BROW PRIMARY ACADEMY  KEELHAM PRIMARY SCHOOL  KEIGHLEY TOWN COUNCIL  SODEXO LTD  BOOTHROYD PRIMARY ACADEMY  KILLINGHALL PRIMARY SCHOOL  BRADFORD ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD COLLEGE  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KINGS SCIENCE ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMIES  BRADHAW PRIMARY SCHOOL  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  BRADHORD SPEN VALLEY HIGH SCHOOL  SOUTH FIRANTS ACADEMIES  SPEN VALLEY HIGH SCHOOL  BRADHOUSE ACADEMY  KIRKLEES COLLEGE  SPIE LTD	BELLE ISLE TENANT MANAGEMENT ORG		SHARE MULTI ACADEMY TRUST
BIRSTALL PRIMARY ACADEMY  JOHN SMEATON ACADEMY  SHIPLEY TOWN COUNCIL  BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  JOSEPH NORTON ACADEMY  KEELHAM PRIMARY SCHOOL  SITLINGTON PARISH COUNCIL  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SODEXO LTD  SODEXO LTD  BOLTON BROW PRIMARY ACADEMY  KHALSA SCIENCE ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH ELMSALL TOWN COUNCIL  BRADFORD ACADEMY  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMY  SOUTH OSSETT INFANTS ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMIES  BRADHAW PRIMARY SCHOOL  KIRKBURTON PARISH COUNCIL  SOUTH FILE SOUTH PENNINE ACADEMIES  SOUTH PENNINE ACADEMIES  SOUTH FILE SCHOOL  BRADHOUSE ACADEMY  KIRKLEES COLLEGE  SPIE LTD	BID SERVICES	, , ,	SHIBDEN HEAD PRIMARY ACADEMY
BLESSED CHRISTOPHER WHARTON ACADEMY TRUST  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST  (KIRKLEES)  BOLTON BROW PRIMARY ACADEMY  KHALSA SCIENCE ACADEMY  KILLINGHALL PRIMARY SCHOOL  BRADFORD COLLEGE  KING JAMES'S SCHOOL  BRADFORD DIOCESAN ACADEMIES TRUST  KINGS SCIENCE ACADEMY  KIRKBURTON PARISH COUNCIL  SODEXO LTD  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMY  SOUTH PENNINE ACADEMIES  BRADFORD LISTRICT CREDIT UNION  KIRKLEES ACTIVE LEISURE  BRADHOUSE ACADEMY  KIRKLEES COLLEGE  KIRKLEES COLLEGE  KIRKLEES COLLEGE  SPIE LTD	BINGLEY GRAMMAR SCHOOL	IQRA ACADEMY (FEVERSHAM EDUCATION TRUST)	SHIPLEY COLLEGE
BLESSED PETER SNOW CATHOLIC ACADEMY TRUST (CALDERDALE)  BLESSED PETER SNOW CATHOLIC ACADEMY TRUST (KIRKLEES)  BOLTON BROW PRIMARY ACADEMY  KEEPMOAT PROPERTY SERVICES LIMITED  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SKILLS FOR CARE LIMITED  SODEXO LTD  BOOTHROYD PRIMARY ACADEMY  KEIGHLEY TOWN COUNCIL  BOOTHROYD PRIMARY ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH BLIMSALL TOWN COUNCIL  BRADFORD ACADEMY  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KINGS SCIENCE ACADEMY  SOUTH OSSETT INFANTS ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMIES  BRADSHAW PRIMARY SCHOOL  KIRKLEES ACTIVE LEISURE  SOUTHFIELD GRANGE TRUST  BRAMLEY ST PETERS C OF E SCHOOL  KIRKLEES COLLEGE  SPIE LTD	BIRSTALL PRIMARY ACADEMY	JOHN SMEATON ACADEMY	SHIPLEY TOWN COUNCIL
CCALDERDALE    REELHAM PRIMARY SCHOOL   STILINGTON PARISH COUNCIL	BLESSED CHRISTOPHER WHARTON ACADEMY TRUST	JOSEPH NORTON ACADEMY	SHIRLEY MANOR PRIMARY ACADEMY
KEEPMOAT PROPERTY SERVICES LIMITED   SKILLS FOR CARE LIMITED		KEELHAM PRIMARY SCHOOL	SITLINGTON PARISH COUNCIL
BOLTON BROW PRIMARY ACADEMY  KEIGHLEY TOWN COUNCIL  BOOTHROYD PRIMARY ACADEMY  KHALSA SCIENCE ACADEMY  SOUTH ELMSALL TOWN COUNCIL  BRADFORD ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HIENDLEY PARISH COUNCIL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KINGS SCIENCE ACADEMY  SOUTH OSSETT INFANTS ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  BRADSHAW PRIMARY SCHOOL  KIRKLEES ACTIVE LEISURE  SOUTH FENNINE ACADEMIES  SOUTH FIELD GRANGE TRUST  KIRKLEES COLLEGE  SPIE LTD		KEEPMOAT PROPERTY SERVICES LIMITED	SKILLS FOR CARE LIMITED
BRADFORD ACADEMY  KILLINGHALL PRIMARY SCHOOL  SOUTH HIENDLEY PARISH COUNCIL  BRADFORD COLLEGE  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KINGS SCIENCE ACADEMY  SOUTH OSSETT INFANTS ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMIES  BRADSHAW PRIMARY SCHOOL  KIRKLEES ACTIVE LEISURE  SOUTHFIELD GRANGE TRUST  BRAMLEY ST PETERS C OF E SCHOOL  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  KIRKLEES COLLEGE  SPIE LTD		KEIGHLEY TOWN COUNCIL	SODEXO LTD
BRADFORD COLLEGE  KING JAMES'S SCHOOL  SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL  BRADFORD DIOCESAN ACADEMIES TRUST  KINGS SCIENCE ACADEMY  SOUTH OSSETT INFANTS ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  BRADSHAW PRIMARY SCHOOL  KIRKLEES ACTIVE LEISURE  SOUTH PENNINE ACADEMIES  SOUTHFIELD GRANGE TRUST  BRAMLEY ST PETERS C OF E SCHOOL  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  KIRKLEES COLLEGE  SPIE LTD	BOOTHROYD PRIMARY ACADEMY	KHALSA SCIENCE ACADEMY	SOUTH ELMSALL TOWN COUNCIL
BRADFORD DIOCESAN ACADEMIES TRUST  KINGS SCIENCE ACADEMY  SOUTH OSSETT INFANTS ACADEMY  BRADFORD DISTRICT CREDIT UNION  KIRKBURTON PARISH COUNCIL  SOUTH PENNINE ACADEMIES  BRADSHAW PRIMARY SCHOOL  KIRKLEES ACTIVE LEISURE  SOUTHFIELD GRANGE TRUST  BRAMLEY ST PETERS C OF E SCHOOL  KIRKLEES CITIZENS ADVICE AND LAW CENTRE  SPEN VALLEY HIGH SCHOOL  KIRKLEES COLLEGE  SPIE LTD	BRADFORD ACADEMY	KILLINGHALL PRIMARY SCHOOL	SOUTH HIENDLEY PARISH COUNCIL
BRADFORD DISTRICT CREDIT UNION KIRKBURTON PARISH COUNCIL SOUTH PENNINE ACADEMIES  BRADSHAW PRIMARY SCHOOL KIRKLEES ACTIVE LEISURE SOUTHFIELD GRANGE TRUST  BRAMLEY ST PETERS C OF E SCHOOL KIRKLEES CITIZENS ADVICE AND LAW CENTRE SPEN VALLEY HIGH SCHOOL  BRIGHOUSE ACADEMY KIRKLEES COLLEGE SPIE LTD	BRADFORD COLLEGE	KING JAMES'S SCHOOL	SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL
BRADSHAW PRIMARY SCHOOL KIRKLEES ACTIVE LEISURE SOUTHFIELD GRANGE TRUST  BRAMLEY ST PETERS C OF E SCHOOL KIRKLEES CITIZENS ADVICE AND LAW CENTRE SPEN VALLEY HIGH SCHOOL  BRIGHOUSE ACADEMY KIRKLEES COLLEGE SPIE LTD	BRADFORD DIOCESAN ACADEMIES TRUST	KINGS SCIENCE ACADEMY	SOUTH OSSETT INFANTS ACADEMY
BRAMLEY ST PETERS C OF E SCHOOL KIRKLEES CITIZENS ADVICE AND LAW CENTRE SPEN VALLEY HIGH SCHOOL  BRIGHOUSE ACADEMY KIRKLEES COLLEGE SPIE LTD	BRADFORD DISTRICT CREDIT UNION	KIRKBURTON PARISH COUNCIL	SOUTH PENNINE ACADEMIES
BRIGHOUSE ACADEMY KIRKLEES COLLEGE SPIE LTD	BRADSHAW PRIMARY SCHOOL	KIRKLEES ACTIVE LEISURE	SOUTHFIELD GRANGE TRUST
	BRAMLEY ST PETERS C OF E SCHOOL	KIRKLEES CITIZENS ADVICE AND LAW CENTRE	SPEN VALLEY HIGH SCHOOL
	BRIGHOUSE ACADEMY	KIRKLEES COLLEGE	SPIE LTD
BRIGHOUSE HIGH SCHOOL KIRKSTALL ST STEPHENS C E (VA) PRIMARY SCHOOL SPRINGWELL ACADEMY LEEDS	BRIGHOUSE HIGH SCHOOL	KIRKSTALL ST STEPHENS C E (VA) PRIMARY SCHOOL	SPRINGWELL ACADEMY LEEDS

CHURCHILL CONTRACT SERVICES (B B G ACADEMY)	MEANWOOD C E (VA) PRIMARY SCHOOL	THE FARNLEY ACADEMY
CHRISTCHURCH C E ACADEMY	MAST ACADEMY TRUST	THE FAMILY OF LEARNING TRUST
CHIEF CONSTABLE FOR WEST YORKSHIRE	MANSTON ST JAMES ACADEMY  THE CROSSLEY HEATH SCHOOL	
CBRE MANAGED SERVICES LIMITED	MAKING SPACE THE CROSSLEY HEATH ACADEMY TRUST	
CATERLINK LIMITED (IRELAND WOOD PRIMARY SCHOOL)	LUDDENDENFOOT ACADEMY	THE CO-OPERATIVE ACADEMIES TRUST
CASTLEFORD ACADEMY TRUST	LONGROYDE JUNIOR SCHOOL	THE BISHOP WHEELER CATHOLIC ACADEMY TRUST
CARROLL CLEANING COMPANY LTD (WHETLEY)	LOCALA (CALDERDALE)	THE BISHOP KONSTANT CATHOLIC TRUST
CARROLL CLEANING COMPANY LTD (WAKEFIELD)	LOCALA	THE ANAH PROJECT
CARROLL CLEANING COMPANY LTD (ST JOHNS WAKEFIELD)	LITTLETOWN JUNIOR SCHOOL	TAYLORSHAW LTD (CROSSGATES BEECHWOOD WHITELAITH)
CARROLL CLEANING COMPANY LTD (SOUTHMERE PRIMARY ACADEMY)	LITTLEMOOR PRIMARY	TAYLOR SHAW LTD (GORSE BOSTON PRIMARY SCHOOL)
CARROLL CLEANING COMPANY LTD (SALTAIRE PRIMARY)	LINDLEY JUNIOR SCHOOL ACADEMY TRUST	TAYLOR SHAW LIMITED (GORSE AT ELLIOTT HUDSON COLLEGE)
CARROLL CLEANING COMPANY LTD (PEEL PARK PRIMARY SCHOOL)	LINDLEY C E INFANT ACADEMY	TAYLOR SHAW LIMITED (GORSE ACADEMIES TRUST)
CARROLL CLEANING COMPANY LTD (HOLY TRINITY PRIMARY)	LIGHTHOUSE SCHOOL	TAYLOR SHAW (RKLT)
CARROLL CLEANING COMPANY LTD (BIRKENSHAW PRIMARY SCHOOL)	LIGHTCLIFFE C. E. J & I SCHOOL	SUEZ RECYCLING AND RECOVERY UK LIMITED
CARROLL CLEANING COMPANY LIMITED (THORNBURY)	LIDGET GREEN COMMUNITY CO-OPERATIVE LEARNING TRUST	STRAWBERRY FIELDS PRIMARY SCHOOL
CARROLL CLEANING COMPANY LIMITED (FRIZINGHALL)	LIBERTY GAS WEST	STAR ACADEMIES TRUST
CARROLL CLEANING COMPANY (NESSFIELD PRIMARY SCHOOL)	LIBERTY GAS OUTER WEST	ST THERESAS CATHOLIC PRIMARY SCHOOL
CARROLL CLEANING CO LTD (LAPAGE PRIMARY SCHOOL)	LEODIS ACADEMIES TRUST	ST PHILIPS CATHOLIC PRIMARY SCHOOL
CARR MANOR COMMUNITY SCHOOL  CARROLL CLEANING COLTD (LAPAGE PRIMARY	LEEDS TRINITY UNIVERSITY	ST PETERS C E PRIMARY SCHOOL
CARLTON ACADEMY TRUST	LEEDS SOCIETY FOR THE DEAF & BLIND	ST PATRICKS CATHOLIC (VA) PRIMARY SCHOOL
CARE QUALITY COMMISSION	LEEDS NORTH WEST EDUCATION PARTNERSHIP	ST OSWALDS CHURCH OF ENGLAND PRIMARY SCHOOL
CARDINAL HEENAN CATHOLIC HIGH SCHOOL	LEEDS METROPOLITAN UNIVERSITY	ST NICHOLAS CATHOLIC PRIMARY SCHOOL
CALVERLEY C OF E PRIMARY SCHOOL	LEEDS JEWISH FREE SCHOOL	ST MICHAEL & ALL ANGELS J & I
CALDER HIGH SCHOOL  CALDERDALE COLLEGE	LEEDS EAST PRINTART PARTNERSHIP TROST	ST MATTHEWS C E PRIMARY SCHOOL
CALDER HIGH SCHOOL	LEEDS COLLEGE OF WOOSE  LEEDS EAST PRIMARY PARTNERSHIP TRUST	ST JOSEPHS RC PRIMARY SCHOOL (TODMORDEN) RCAT
CAFCASS	LEEDS COLLEGE OF MUSIC	ST JOSEPHS CATHOLIC (VA) PRIMARY SCHOOL WETHERBY
C AND K CAREERS LTD	LEEDS COLLEGE OF BUILDING	ST JOHN'S PRIMARY ACADEMY RISHWORTH
BUTTERSHAW BUSINESS AND ENTERPRISE COLLEGE	LEEDS CITY ACADEMY  LEEDS CITY COLLEGE	ST JOHN'S (CE) PRIMARY ACADEMY TRUST  ST JOHN'S APPROVED PREMISES LIMITED
BURLEY PARISH COUNCIL  BURNLEY ROAD ACADEMY	LEEDS CENTRE FOR INTEGRATED LIVING  LEEDS CITY ACADEMY	ST GREGORY THE GREAT CATHOLIC ACADEMY TRUST  ST JOHN'S (CE) PRIMARY ACADEMY TRUST
BULLOUGHS CLEANING SERVICES LIMITED (WRAT)	LEEDS C.A.B.	ST FRANCIS OF ASSISI CATHOLIC (VA) PRIMARY SCHOOL
COLLEGE)	LEEDS BECKETT UNIVERSITY	ST FRANCIS CATHOLIC PRIMARY SCHOOL
BROOKSBANK SCHOOL SPORTS COLLEGE BULLOUGH CONTRACT SERVICES (LEEDS CITY		ST EDWARDS CATHOLIC (VA) PRIMARY SCHOOL
BRONTE ACADEMY TRUST	LEEDS APPROPRIATE ADULT SERVICE  LEEDS ARTS UNIVERSITY	ST ANTHONYS CATHOLIC (VA) PRIMARY SCHOOL
BRODETSKY JEWISH (V A) PRIMARY SCHOOL		
BRITISH GAS SOCIAL HOUSING LTD  BRODETSKY IEWISH (V.A.) PRIMARY SCHOOL	LANE END PRIMARY TRUST  LEARNING ACCORD MULTI ACADEMY TRUST	ST ANNES CATHOLIC PRIMARY ACADEMY  ST ANNE'S COMMUNITY SERVICES
BRIGSHAW LEARNING PARTNERSHIP	LAISTERDYKE LEADERSHIP ACADEMY	ST ANNE'S (BRADFORD) COMMUNITY SERVICES
BRIGHTER FUTURES ACADEMY TRUST	LADY ELIZABETH HASTINGS SCHOOL	SSE CONTRACTING LTD

COLLEGE SCHEMING  MARKET (IN INVEST)  THE MATTERN LEARNING TRUTT  CHURCHELL CONTRACT SERVICES (INTERNOL SERVICES DEVERED SERVICES DEVERED MATE)  CHURCHELL CONTRACT SERVICES SERVICES SERVICES SERVICES DEVERED MATE  CHURCHELL CONTRACT SERVICES SERVICES SERVICES SERVICES DEVERED MATE  CHURCHELL CONTRACT SERVICES SERVICES SERVICES SERVICES SERVICES SERVICES SERVICES  CHURCHELL CONTRACT SERVICES SERVICES SERVICES SERVICES SERVICES SERVICES SERVICES  CHURCHELL CONTRACT SERVICES SER	CHURCHILL CONTRACT SERVICES (BRADFORD	MEARS LTD (SOUTH)	THE GORSE ACADEMIES TRUST	
MELIOS CATERIOS GENVES SENVES TRUST  CHURCHILL CONTRACT SENVES SINAS MATI CHURCHILL C		. ,		
MILLORS CATERING SERVICES (PAINE MAY)  CHURCHILL CONTINACT SERVICES (PAINE MAY)  CHURCHILL CONTINACT SERVICES (TO PINST)  CHURCHILL CONTINACT SERVICES (TO PINST)  CHURCHILL CONTINACT SERVICES (TO PINST)  CHARACTER FRIBANAY SCHOOL  CHARAC	CHURCHILL CONTRACT SERVICES (OUTWOOD			
WALLOWS CATEMENTS SPRICES INTO PROPERTY   ACADEMISE RISES SERVICES   MINITED PROPERTY SERVICES INTO PROPERTY SER	•	, ,		
MODERATE PRIMAY CHOICE		,		
DECEMBER PRIMARY SCHOOL    PRECENTATION PRIMARY SCHOOL   ACADEMUS TRUST   COLUMN PRIMARY SCHOOL   COLU	•	ACADEMIES TRUST)	THORNHILL JUNIOR AND INFANT SCHOOL	
ACADEMIS TRUST) COLUMPIAN MULTI ACADEMY TRUST  MELIORS CATERINA SERVICES LTD (CAVENDISH PRINARY)  MELIORS CATERINA SERVICES LTD (WANT)  MELIORS CATERINA SERVICES LTD (WANT)  MELIORA CATERINA SERVICES LTD (WANT)  THIS CATERINA SERVICIA EL (MANT)  TO DOMORDEN TOWN COUNCIL  COMMUNITY ACADEMY TRUST  MINISTROPE ACADEMY TRUST  MINISTROPE ACADEMY TRUST  MINISTROPE ACADEMY TRUST  TO DOMORDEN TOWN COUNCIL  COMMASS CONTRACT SERVICES (MASTERDYRE)  MINISTROPE ACADEMY TRUST  TO SERVER HOUSING ASSOCIATION LTD (PERMINE)  COMMASS CONTRACT SERVICES (MASTERDYRE)  MINISTROPE ACADEMY TRUST  TO	CLAPGATE PRIMARY SCHOOL	(HECKMONDWIKE GRAMMAR SCHOOL)	THORNTON GRAMMAR SCHOOL	
COCKBURN MULTI ACADEMY TRUST  MILLORS CATERING SERVICES ITO (WRAT)  MILLORS CATERING SERVICES ITO (WRAT)  MILLORS CATERING SERVICES (ITO (WRAT)  TO COMPRISE HOUSING ASSOCIATION ITO (GREENALE)  COMPASS CIRCINAT SERVICES (IALDSTROWNE)  MIRSTROPE ACADEMY TRUST  COMPASS CONTRACT SERVICES (IALDSTROWNE)  MIRSTROPE ACADEMY TRUST  COMPASS CONTRACT SERVICES (IALDSTROWNE)  MIRSTROPE ACADEMY TRUST  TO GETHER HOUSING ASSOCIATION ITO (GREENALE)  COMPASS CONTRACT SERVICES (IALDSTROWNE)  MIRSTROP SERVICES (IALDSTROWNE)  MIRSTROM INTO SERVICES (IALDSTROWNE)  MIRSTROM SERVICES (IALDSTRO	CLAYTON PARISH COUNCIL	ACADEMIES TRUST)	THORNTON PRIMARY SCHOOL	
COLUMBITANT TOWN COUNCIL  COLUMBITANT TOWN COUNCIL  COLUMBITANT TOWN COUNCIL  COMMUNITY ACCORD  MICKEFFELD PARISH COUNCIL  COMMUNITY ACCORD  MICKEFFELD PARISH COUNCIL  COMMANS LEEDS PH SCHOOLS]  MINSTHORPE ACADEMY TRUST  COMPASS CONTRACT SERVICES (LAISTEROYKE)  MIRTE CATERING SERVICES LIMITED  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE CATERING SERVICES LIMITED  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE CATERING SERVICES LIMITED  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE MITTO IP.C.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE FILE TO IP.C.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE FILE INTERO IP.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE FILE INTERO IP.C.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE FILE INTERO IP.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE FILE INTERO IP.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  TRANMERE PARK PRIMARY  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE PILE INTERO IP.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE PILE INTERO IP.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE PILE INTERO IP.C.FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE PILE INTERO IP.C.FOR WEST YORKSHIRE  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (INSTEROYKE)  MITTE PILE INTERO IP.C.FOR WEST YORKSHIRE  TRANMERE PARK PRIMARY SCHOOL  MORRES PILE INTERO IP.C.FOR TO PILE IP.C.FOR T	COALFIELDS REGENERATION TRUST	•	THORP ARCH LADY ELIZABETH HASTINGS C E (VA) PRIMARY SCHOOL	
COLINGHAN LADY ELZABETH HASTINGS MEISTON PARISH COUNCIL TOGETHER HOUSING ASSOCIATION LTD (GREENVALE)  COMMUNITY ACCORD MICHER PARISH COUNCIL TOGETHER HOUSING ASSOCIATION LTD (GREENVALE)  COMMASS CONTRACT SERVICES (LASTERDYKE) MIRTELD FREE GRAMMAR SCHOOL TOGETHER HOUSING ASSOCIATION LTD (GREENVALE)  COMMASS CONTRACT SERVICES (INORTHERN EDUCATION TRUST)  COMMASS CONTRACT SERVICES (INORTHERN) MITTE CATERING SERVICES LIMITED TONG HIGH SCHOOL  COMMASS CONTRACT SERVICES (INORTHERN) MITTE CATERING SERVICES LIMITED TONG HIGH SCHOOL  COMMASS CONTRACT SERVICES (INORTHERN) MITTE PAIL TO (P.C.C FOR WEST YORKSHIRE) TRANSCER PARK PRIMARY  COMMASS CONTRACT SERVICES (INORTHERN) MITTE PAIL TO (P.C.C FOR WEST YORKSHIRE) TRANSCER PARK PRIMARY  COMMASS CONTRACT SERVICES (INVESTURE) MITTE (INTERNATED SERVICES LIMITED TRANSCER PARK PRIMARY  COMMASS CONTRACT SERVICES (INVESTURE) MITTE (INTERNATED SERVICES LIMITED (INTERNATED SERVICES INTERNATED SERVICES (INVESTURE)  COMPASS CONTRACT SERVICES (INVESTURE) MITTED (INTERNATED SERVICES INTERNATED SERVICES (INVESTURE) MITTED (INTERNATED SERVICES INTERNATED SERVICES (INVESTURE) MITTED (INTERNATED SERVICES INTERNATED SERVICES INTERNATED SERVICES (INVESTURE) MORRIAND SERVICES INVESTURE PRIMARY SCHOOL MORRIAND SERVICES INTERNATED SERVICES INVESTURE PRIMARY SCHOOL MORRIAND SERVICES INTERNATED SERVICES INVESTURE PRIMARY SCHOOL NORTH HAUBTAND SERVICES INTERNATED SERV	COCKBURN MULTI ACADEMY TRUST	MELLORS CATERING SERVICES LTD (WRAT)	TNS CATERING (SPTA)	
MINISTHORPE ACADEMY TRUST TOGETHER HOUSING ASSOCIATION LTD (GREENVALE)  COMPASS (LEEDS PH SCHOOLS) MINISTHORPE ACADEMY TRUST TOGETHER HOUSING ASSOCIATION LTD (PENNINE)  COMPASS CONTRACT SERVICES (LAISTERDYKE) MIRE CATERING SERVICES LIMITED TONG HEIGH SCHOOL  COMPASS CONTRACT SERVICES (NORTHERN BOUGHTON TRUST)  MITIE CATERING SERVICES LIMITED TONG HEIGH SCHOOL  COMPASS CONTRACT SERVICES (TO HIN PISHERS) MITIE OF LTD TONG LEADERSHIP ACADEMY  COMPASS CONTRACT SERVICES (UK) (PONTEFRACT) MITIE PINTE PINTE MITIE PINTE MITI	COLLABORATIVE LEARNING TRUST	MELTHAM TOWN COUNCIL	TNS CATERING MAN LTD (ST BOTOLPHS)	
COMPASS (LEEDS PFI SCHOOLS)  MINSTHORPE ACADEMY TRUST  TOGETHER LEARNING TRUST  COMPASS CONTRACT SERVICES (LAISTERDYKE)  MITE CATERING SERVICES LIMITED  TONG HIGH SCHOOL  COMPASS CONTRACT SERVICES (NORTHERN EDUCATION TRUST)  MITE CATERING SERVICES LIMITED  TONG HIGH SCHOOL  COMPASS CONTRACT SERVICES (TJOHN FISHERS)  MITE PAIL TD  TONG LEADERSHIP ACADEMY  TRUST  TRANMERE PARK PRIMARY  ACADEMIST TRUST  TRUST ACADEMY  TRUST  TRUST ACADEMY HAUFAX  TRUST  TRUST  TRUST ACADEMY HAUFAX  TRUST  TRUST ACADEMY HAUFAX  TRUST  TRUST  TRUST ACADEMY HAUFAX  TRUST  TRUST  TRUST ACADEMY HAUFAX  TRUST  TRUST  TRUST  TRUST  TRUST ACADEMY HAUFAX  TRUST  TRUST  TRUST  TRUST  TRUST  TRUST  TRUST ACADEMY HAUFAX  TRUST  TRU	COLLINGHAM LADY ELIZABETH HASTINGS	MENSTON PARISH COUNCIL	TODMORDEN TOWN COUNCIL	
COMPASS CONTRACT SERVICES (NORTHERN EDUCATION TRUST)  COMPASS CONTRACT SERVICES (NORTHERN EDUCATION TRUST)  COMPASS CONTRACT SERVICES (NORTHERN EDUCATION TRUST)  COMPASS CONTRACT SERVICES (ST)OHN FISHERS)  MITTE FM LTD  TONG HIGH SCHOOL  COMPASS CONTRACT SERVICES (UN) (PONTERACT  MITTE FM LTD  TONG HEADERSHIP ACADEMY  COMPASS CONTRACT SERVICES (UN) (PONTERACT  MITTE FM LTD (P.C.C FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (UN) (PONTERACT  MITTE FM LTD (P.C.C FOR WEST YORKSHIRE)  TRANMERE PARK PRIMARY  COMPASS CONTRACT SERVICES (UX) (PONTERACT  MITTE HILD (LECDS SCHOOLS PH)  TURNING DIVES AROUND  COMPASS CONTRACT SERVICES (WEST YORKSHIRE)  TURNING POINT  TURNING POINT  COMPASS CONTRACT SERVICES (WEST YORKSHIRE)  TURNING POINT  TURNI	COMMUNITY ACCORD	MICKLEFIELD PARISH COUNCIL	TOGETHER HOUSING ASSOCIATION LTD (GREENVALE)	
COMPASS CONTRACT SERVICES (IX) PONTEFRACT COMPASS CONTRACT SERVICES (IX) IPONTEFRACT COMPASS CONTRACT SERVICES (IX) ITO MITTE FM LTD (P.C.C FOR WEST YORKSHIRE) TRANMERE PARK PRIMARY COMPASS CONTRACT SERVICES (IXI) ITO MITTE INTEGRATED SERVICES LTD TRAINING LIVES AROUND TURNING POINT COMPASS CONTRACT SERVICES (IVE) ITO MITTE INTITED (IECDS SCHOOLS PFI) TURNING POINT COMPASS CONTRACT SERVICES (IVE) ITO COMP	COMPASS (LEEDS PFI SCHOOLS)	MINSTHORPE ACADEMY TRUST	TOGETHER HOUSING ASSOCIATION LTD (PENNINE)	
EDUCATION TRUST) MITTE CATEMINE SERVICES LIMITED TONS LEADERSHIP ACADEMY  COMPASS CONTRACT SERVICES (UK) (PONTEFRACT COMPASS CONTRACT SERVICES (UK) (PONTEFRACT COMPASS CONTRACT SERVICES (UK) LTD MITTE INTEGRATED SERVICES LTD TRAINING LIVES AROUND  COMPASS CONTRACT SERVICES (UK) LTD MITTE INTEGRATED SERVICES LTD TRAINING LIVES AROUND  COMPASS CONTRACT SERVICES (WESTBOROUGH MITTE LIMITED (LECED SCHOOLS PFI) TURNING LIVES AROUND  COMPASS CONTRACT SERVICES (WESTBOROUGH MITTE LIMITED LILIEDS SCHOOLS PFI) TURNING LIVES AROUND  COMPASS CONTRACT SERVICES (WESTBOROUGH MITTE LIMITED LIMITED LIMITED LIMITED TURNING POINT  COMPASS CONTRACT SERVICES (WESTBOROUGH MITTE PFI LIMITED LI	COMPASS CONTRACT SERVICES (LAISTERDYKE)	MIRFIELD FREE GRAMMAR SCHOOL	TOGETHER LEARNING TRUST	
MITIE FM LTD (P.C.C FOR WEST YORKSHIRE) TRANMERE PARK PRIMARY ACADEMIES TRUST)  OMPASS CONTRACT SERVICES (UK) LTD  MITIE INTEGRATED SERVICES LTD  TRINITY ACADEMY HALIFAX  TRANMERE PARK PRIMARY ACADEMY COMPASS CONTRACT SERVICES (WESTBOROUGH HIGH SCHOOL) MITIE LIMITED (LEEDS SCHOOLS PFI)  TURNING LIVES AROUND  TURNING POINT  CONSUSTANT CLEANERS LIMITED (WESTBOROUGH HIGH SCHOOL) MORLANDS LEARNING TRUST  UNITED RESPONSE  UNIVERSITY ACADEMY KEIGHLEY  CORRIDGE HOLY TRINITY C & PRIMARY SCHOOL  MORLANDS LEARNING TRUST  UNIVERSITY ACADEMY KEIGHLEY  CORPUS CHRISTI CATHOLIC PRIMARY SCHOOL  MORLANDS LEARNING TRUST  UNIVERSITY OF BRADFORD  COTTINGLEY PRIMARY ACADEMY  MOUNT ST MARYS CATHOLIC HIGH SCHOOL  UNIVERSITY OF HUDDERSFIELD  CREATIVE SUPPORT LIMITED  NILC SERVICES GROUP LIMITED (MIDDLETON ST  WEST AMANGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  MARS LEEDS  VESTA MANAGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  MARS LEEDS  VESTA MANAGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  MARS LEEDS  VESTA MANAGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  MARS LEEDS  VESTA MANAGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  WAS FILE & RESCUE AUTHORITY  WEST AMANGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  MARS LEEDS  VESTA MANAGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  MARS LEEDS  VESTA MANAGEMENT GROUP LTD (LOANE ROYD J. & IS CHOOL)  MARS LEEDS  VESTA MANA	· ·	MITIE CATERING SERVICES LIMITED	TONG HIGH SCHOOL	
ACADEMIST RRUST) MITTE INTEGRATED SERVICES (UK) LTD MITTE INTEGRATED SERVICES LTD TRINITY ACADEMY HALIFAX  COMPASS CONTRACT SERVICES (WESTBOROUGH HIGH SCHOOL)  COMPASS CONTRACT SERVICES (WESTBOROUGH HIGH SCHOOL)  COMPASS CONTRACT SERVICES (WHEFLEY ACADEMY)  MITTE PILIMITED  TURNING POINT  T	COMPASS CONTRACT SERVICES (ST JOHN FISHERS)	MITIE FM LTD	TONG LEADERSHIP ACADEMY	
COMPASS CONTRACT SERVICES (WESTBOROUGH HIGH SCHOOL)  COMPASS CONTRACT SERVICES (WHETLEY ACADEMY)  MITTLE PELIMITED  TURNING POINT  TURNING PURSESTED  TUR		MITIE FM LTD (P.C.C FOR WEST YORKSHIRE)	TRANMERE PARK PRIMARY	
HIGH SCHOOL)  MITTE PET LIMITED  TURNING LIVES AROUND  TURNING POINT  TURNING POINT  TURNING POINT  CONSULTANT CLEANERS LIMITED (WESTBOROUGH HIGH SCHOOL)  MORLEY ACADEMY  MORLEY ACADEMY  MORLEY ACADEMY  MOUNT ST MARYS CATHOUC HIGH SCHOOL  COTTINGLEY PRIMARY ACADEMY  MOUNTAIN HEALTHCARE LTD (WY POLICE)  UNIVERSITY OF BRADFORD  CREATIVE SUPPORT LIMITED  MYRTLE PARK PRIMARY SCHOOL  MALC. SERVICES GROUP LIMITED (MIDDLETON ST MARY SCHOOL)  MARY SLEEDS)  CRESCENT PURCHASING LTD  MATIONAL COAL MINING MUSEUM FOR ENGLAND  WY.FIRE & RESCUE AUTHORITY  CROFTON ACADEMY  NEW COLLABORATIVE LEARNING TRUST  WAKEFIELD & DISTRICT HOUSING LTD  CROSSLEY HALL PRIMARY SCHOOL  NINELANDS PRIMARY SCHOOL  MINELANDS PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  CROSSLEY STREET PRIMARY SCHOOL  NORTH HALLFAX GRAMMAR ACADEMY  WEST NORTH WEST HOMES LEEDS  HOST OF PRIMARY SCHOOL  NORTH HALLFAX GRAMMAR ACADEMY  WEST NORTH WEST HOMES LEEDS  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALLFAX PARTINERSHIP LTD  WEST YORKSHIRE COMBINED AUTHORITY  DELTA ACADEMIES TRUST  NORTH HALLFAX PARTINERSHIP LTD  WEST YORKSHIRE COMBINED AUTHORITY  DELTA ACADEMIES TRUST LTD  NORTH HALLFAX PARTINERSHIP LTD  WEST YORKSHIRE COMBINED AUTHORITY  WEST. YORKSHIRE COMBINED AUTHORITY  WEST. YORKSHIRE FRA  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKSHIRE FRA  DENBY DALE PARISH COUNCIL  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE ITA  WEST. YORKSHIRE ITA	COMPASS CONTRACT SERVICES (UK) LTD	MITIE INTEGRATED SERVICES LTD	TRINITY ACADEMY HALIFAX	
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HIGH SCHOOL)  MOREY ACADEMY  MOUNT ST MARYS CATHOLIC HIGH SCHOOL  MOUNT ST MARYS CHOOL  MOUNT ST MARYS CATHOLIC HIGH SCHOOL  MOUNT ST MARY SCHOOL  MOUNT ST MARY SCHOOL  MOUNT ST MOUNT ST HIGH SCHOOL  MOUNT ST MARKS SCHOOL  MOUNT ST MARY SCHOOL  MOUNT ST MARY SCHOOL  MOUNT ST	·	MITIE PFI LIMITED	TURNING POINT	
CORPUS CHRISTI CATHOLIC PRIMARY SCHOOL MOUNT ST MARYS CATHOLIC HIGH SCHOOL UNIVERSITY OF BRADFORD  COTTINGLEY PRIMARY ACADEMY MOUNTAIN HEALTHCARE LTD (W Y POLICE) UNIVERSITY OF HUDDERSFIELD  CRAFT CENTRE & DESIGN GAL. LTD MYRTLE PARK PRIMARY SCHOOL UNIVERSITY TECHNICAL COLLEGE LEEDS  CREATIVE SUPPORT LIMITED N.I.C. SERVICES GROUP LIMITED (MIDDLETON ST VESTA MANAGEMENT GROUP LTD (DANE ROYD J & I SCHOOL)  CRESCENT PURCHASING LTD NATIONAL COAL MINING MUSEUM FOR ENGLAND VICTORIA PRIMARY ACADEMY  CRIGGLESTONE ST JAMES CE PRIMARY ACADEMY NELL BANK CHARITABLE TRUST W.Y. FIRE & RESCUE AUTHORITY  CROFTON ACADEMY NEW COLLABORATIVE LEARNING TRUST WAKEFIELD & DISTRICT HOUSING LTD  CROSSLEY HALL PRIMARY SCHOOL NINELANDS PRIMARY SCHOOL WAKEFIELD COLLEGE  CROSSLEY STREET PRIMARY SCHOOL NORMANTON TOWN COUNCIL WATERTON ACADEMY TRUST  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL NORTH HALIFAX GRAMMAR ACADEMY WELLSPRING ACADEMY TRUST  DARRINGTON C OF E PRIMARY SCHOOL NORTH HALIFAX GRAMMAR ACADEMY WEST NORTH WEST HOMES LEEDS  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL NORTH HALIFAX PARTNERSHIP LTD WEST YORKSHIRE COMBINED AUTHORITY  DELTA ACADEMIES TRUST NORTH HUDDERSFIELD TRUST SCHOOL WEST YORKSHIRE FRA  DENBY DALE PARISH COUNCIL NORTHERN AMBITION ACADEMIES TRUST WEST. YORKS. POLICE CIVILIAN  DIXONS ACADEMIES CHARITABLE TRUST LTD NORTHERN AGMITTON TRUST WEST. YORKSHIRE ITA  DIXONS ACADEMIES CHARITABLE TRUST LTD NORTHERN SCHOP CONTEMP DANCE WEST. YORKSHIRE ITA  DIXONS ACADEMIES CHARITABLE TRUST LTD NORTHERN SCHOP CONTEMP DANCE WEST. YORKSHIRE ITA	•	MOORLANDS LEARNING TRUST	UNITED RESPONSE	
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CRAFT CENTRE & DESIGN GAL. LTD  MYRTLE PARK PRIMARY SCHOOL  UNIVERSITY TECHNICAL COLLEGE LEEDS  VESTA MANAGEMENT GROUP LTD (DANE ROYD J & I SCHOOL)  CRESCENT PURCHASING LTD  NATIONAL COAL MINING MUSEUM FOR ENGLAND  VICTORIA PRIMARY ACADEMY  NELL BANK CHARITABLE TRUST  WY. FIRE & RESCUE AUTHORITY  CROFTON ACADEMY  NEW COLLABORATIVE LEARNING TRUST  WAKEFIELD & DISTRICT HOUSING LTD  NINELANDS PRIMARY SCHOOL  NINELANDS PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  WATERTON ACADEMY TRUST  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  ARRINGTON C OF E PRIMARY SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY TRUST]  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALIFAX PARTNERSHIP LTD  WEST YORKSHIRE COMBINED AUTHORITY  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  WEST, YORKSHIRE FRA  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKSHIRE ITA  WEST. YORKSHIRE ITA  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKSHIRE P.T.E.	CORPUS CHRISTI CATHOLIC PRIMARY SCHOOL	MOUNT ST MARYS CATHOLIC HIGH SCHOOL	UNIVERSITY OF BRADFORD	
CREATIVE SUPPORT LIMITED  N.I.C. SERVICES GROUP LIMITED (MIDDLETON ST MARYS LEEDS)  VESTA MANAGEMENT GROUP LTD (DANE ROYD J & I SCHOOL)  CRESCENT PURCHASING LTD  NATIONAL COAL MINING MUSEUM FOR ENGLAND  VICTORIA PRIMARY ACADEMY  NELL BANK CHARITABLE TRUST  W.Y. FIRE & RESCUE AUTHORITY  WAKEFIELD & DISTRICT HOUSING LTD  CROSSLEY HALL PRIMARY SCHOOL  NINELANDS PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  CROSSLEY STREET PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  DARRINGTON C OF E PRIMARY SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY  WEST NORTH WEST HOMES LEEDS  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALIFAX PARTNERSHIP LTD  WEST YORKSHIRE COMBINED AUTHORITY  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	COTTINGLEY PRIMARY ACADEMY	MOUNTAIN HEALTHCARE LTD (W Y POLICE)	UNIVERSITY OF HUDDERSFIELD	
CRESCENT PURCHASING LTD  NATIONAL COAL MINING MUSEUM FOR ENGLAND  VICTORIA PRIMARY ACADEMY  NELL BANK CHARITABLE TRUST  W.Y. FIRE & RESCUE AUTHORITY  CROFTON ACADEMY  NEW COLLABORATIVE LEARNING TRUST  WAKEFIELD & DISTRICT HOUSING LTD  WAKEFIELD & DISTRICT HOUSING LTD  WAKEFIELD COLLEGE  CROSSLEY HALL PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  DARRINGTON C OF E PRIMARY SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALIFAX PARTNERSHIP LTD  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  WEST YORKSHIRE FRA  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKS. POLICE CIVILIAN  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN BCLOF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	CRAFT CENTRE & DESIGN GAL. LTD	MYRTLE PARK PRIMARY SCHOOL	UNIVERSITY TECHNICAL COLLEGE LEEDS	
CRESCENT PURCHASING LTD  NATIONAL COAL MINING MUSEUM FOR ENGLAND  VICTORIA PRIMARY ACADEMY  NELL BANK CHARITABLE TRUST  W.Y. FIRE & RESCUE AUTHORITY  CROFTON ACADEMY  NEW COLLABORATIVE LEARNING TRUST  WAKEFIELD & DISTRICT HOUSING LTD  CROSSLEY HALL PRIMARY SCHOOL  NINELANDS PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  WATERTON ACADEMY TRUST  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  DARRINGTON C OF E PRIMARY SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY TRUST)  DELIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALIFAX PARTNERSHIP LTD  WEST YORKSHIRE COMBINED AUTHORITY  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  WEST YORKSHIRE FRA  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	CREATIVE SUPPORT LIMITED	,	VESTA MANAGEMENT GROUP LTD (DANE ROYD J & I SCHOOL)	
CROSSLEY HALL PRIMARY SCHOOL  NINELANDS PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  DARRINGTON C OF E PRIMARY SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HUDDERSFIELD TRUST SCHOOL  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN BULCATION TRUST  WAKEFIELD & DISTRICT HOUSING LTD  WATERION COLLEGE  WEST YORADEMY TRUST  WEST YORADEMY TRUST  WEST HUDSING ACADEMY TRUST  WEST YORKSHIRE COMBINED AUTHORITY  WEST. YORKS. POLICE CIVILIAN  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	CRESCENT PURCHASING LTD	·	VICTORIA PRIMARY ACADEMY	
CROSSLEY HALL PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  WATERTON ACADEMY TRUST  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALIFAX PARTNERSHIP LTD  DEITA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  WEST YORKSHIRE COMBINED AUTHORITY  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKS. POLICE CIVILIAN  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	CRIGGLESTONE ST JAMES CE PRIMARY ACADEMY	NELL BANK CHARITABLE TRUST	W.Y. FIRE & RESCUE AUTHORITY	
CROSSLEY STREET PRIMARY SCHOOL  NORMANTON TOWN COUNCIL  CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  DARRINGTON C OF E PRIMARY SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALIFAX PARTNERSHIP LTD  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  NORTH HUDDERSFIELD TRUST SCHOOL  NORTHERN AMBITION ACADEMIES TRUST  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	CROFTON ACADEMY	NEW COLLABORATIVE LEARNING TRUST	WAKEFIELD & DISTRICT HOUSING LTD	
CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL  DARRINGTON C OF E PRIMARY SCHOOL  NORTH HALIFAX GRAMMAR ACADEMY  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  NORTH HALIFAX PARTNERSHIP LTD  WEST YORKSHIRE COMBINED AUTHORITY  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  WEST YORKSHIRE FRA  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKS. POLICE CIVILIAN  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	CROSSLEY HALL PRIMARY SCHOOL	NINELANDS PRIMARY SCHOOL	WAKEFIELD COLLEGE	
DARRINGTON C OF E PRIMARY SCHOOL  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST YORKSHIRE COMBINED AUTHORITY  WEST YORKSHIRE FRA  WEST. YORKS. POLICE CIVILIAN  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	CROSSLEY STREET PRIMARY SCHOOL	NORMANTON TOWN COUNCIL	WATERTON ACADEMY TRUST	
DARRINGTON C OF E PRIMARY SCHOOL  DEIGHTON GATES PRIMARY FOUNDATION SCHOOL  DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKS. POLICE CIVILIAN  WEST. YORKSHIRE ITA  WEST. YORKSHIRE ITA  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.		•	WELLSPRING ACADEMY TRUST	
DELTA ACADEMIES TRUST  NORTH HUDDERSFIELD TRUST SCHOOL  WEST YORKSHIRE FRA  DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKS. POLICE CIVILIAN  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.		,	WEST NORTH WEST HOMES LEEDS	
DENBY DALE PARISH COUNCIL  NORTHERN AMBITION ACADEMIES TRUST  WEST. YORKS. POLICE CIVILIAN  DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKSHIRE ITA  WEST. YORKSHIRE P.T.E.	DEIGHTON GATES PRIMARY FOUNDATION SCHOOL	NORTH HALIFAX PARTNERSHIP LTD	WEST YORKSHIRE COMBINED AUTHORITY	
DIXONS ACADEMIES CHARITABLE TRUST LTD  NORTHERN EDUCATION TRUST  WEST. YORKSHIRE ITA  DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	DELTA ACADEMIES TRUST	NORTH HUDDERSFIELD TRUST SCHOOL	WEST YORKSHIRE FRA	
DOLCE LIMITED (BISHOP KONSTANT C.A.T)  NORTHERN SCH.OF CONTEMP DANCE  WEST. YORKSHIRE P.T.E.	DENBY DALE PARISH COUNCIL	NORTHERN AMBITION ACADEMIES TRUST	WEST. YORKS. POLICE CIVILIAN	
	DIXONS ACADEMIES CHARITABLE TRUST LTD	NORTHERN EDUCATION TRUST	WEST. YORKSHIRE ITA	
EAST NORTH EAST HOMES LEEDS NORTHERN STAR ACADEMIES TRUST WESTBOROUGH HIGH SCHOOL	DOLCE LIMITED (BISHOP KONSTANT C.A.T)	NORTHERN SCH.OF CONTEMP DANCE	WEST. YORKSHIRE P.T.E.	
	EAST NORTH EAST HOMES LEEDS	NORTHERN STAR ACADEMIES TRUST	WESTBOROUGH HIGH SCHOOL	

EBOR GARDENS PRIMARY ACADEMY	NORTHORPE HALL CHILD AND FAMILY TRUST	WESTWOOD PRIMARY SCHOOL TRUST
ELEMENTS PRIMARY SCHOOL	NOTRE DAME SIXTH FORM COLLEGE	WETHERBY HIGH SCHOOL
ELEVATE MULTI ACADEMY TRUST	NPS LEEDS LIMITED	WETHERBY TOWN COUNCIL
ELITE CLEANING AND ENVIRONMENTAL SERVICES LTD	NURTURE ACADEMIES TRUST	WHINMOOR ST PAULS C E PRIMARY SCHOOL
ENGIE SERVICES LTD	NURTURE ACADEMIES TRUST (DOLCE)	WHITEHILL COMMUNITY ACADEMY
ENHANCE ACADEMY TRUST	OASIS ACADEMY LISTER PARK	WILLIAM HENRY SMITH SCHOOL
ENVIROSERVE (PRIESTLEY ACADEMY TRUST)	OLD EARTH ACADEMY	WILSDEN PRIMARY SCHOOL
ENVIROSERVE (VICTORIA PRIMARY ACADEMY)	ONE IN A MILLION FREE SCHOOL	WOLSELEY UK LTD
ETHOS ACADEMY TRUST	OPEN COLLEGE NETWORK YORKS & HUMBER (TRADING AS CERTA)	WOODSIDE ACADEMY
EVOLVE ACADEMY (ETHOS ACADEMY TRUST)	OSSETT TRUST	WORTH VALLEY PRIMARY SCHOOL
EXCEED ACADEMIES TRUST	OTLEY TOWN COUNCIL	WRAT - LEEDS EAST ACADEMY
FAIRFIELD SCHOOL	OUR LADY OF GOOD COUNSEL CATHOLIC PRIMARY SCHOOL	WRAT - LEEDS WEST ACADEMY
FALCON EDUCATION ACADEMIES TRUST	OUTWOOD ACADEMY FREESTON	YEADON WESTFIELD INFANTS
FEVERSHAM EDUCATION TRUST	OUTWOOD ACADEMY HEMSWORTH	YEADON WESTFIELD JUNIOR
FEVERSHAM PRIMARY ACADEMY	OUTWOOD ACADEMY WAKEFIELD CITY	YORKSHIRE PURCHASING ORGANISATION
FIELDHEAD JUNIOR INFANT AND NURSERY ACADEMY	OUTWOOD GRANGE ACADEMY	
FLEET FACTORS LTD	OUTWOOD PRIMARY ACADEMY BELL LANE	

This glossary is provided to assist the reader. It offers an explanation of terms in common use in relation to local authority finance, many of which are used within this document.

#### Accruals

Income and expenditure are recognised as they are earned or incurred. When income is due to the Council but has not been received an accrual is made for the debtor. When the Council owes money but the payment has not been made an accrual is made for the creditor.

#### **Assets Held for Sale**

These are assets previously used in the provision of services by the Council which are now available for immediate sale. The assets are being actively marketed and a sale is probable.

#### **Associated Company**

A company over which the Council is able to exercise significant influence (see also Group Accounts).

## **Capital Adjustment Account**

The Capital Adjustment Account (CAA) was set up in 2008-9 following UK GAAP accountancy changes and replaces the Capital Financing Account. It is required to ensure that both sides of the Balance Sheet remain in balance, and increases and decreases in asset valuations are credited and debited to this account as appropriate following asset revaluations.

#### **Capital Charges**

Charges to services for the use of assets. They comprise depreciation, based on the current value of the assets used in the provision of services.

#### **Capital Expenditure**

Expenditure on the acquisition of non-current assets, or which adds to, and not merely maintains, the value to the Council of existing non-current assets. Non-current assets provide economic benefits to the Council for a period in excess of one year.

### **Capital Financing Requirement**

A measure defined by the Prudential Code of the Council's level of borrowing for capital purposes. It is based on the Balance Sheet of the Council. It is the basis for calculating the charge to be made to revenue for debt repayment each year (see Minimum Revenue Provision).

#### **Capital Receipts**

Income from the disposal of land and other assets and from the repayment of grants and loans made to others for capital purposes. The income can only be used either to finance new capital spending or to reduce the capital financing requirement through the repayment of debt.

## Code of Practice on Local Authority Accounting in the United Kingdom (the Code)

This document is produced by the Chartered Institute of Public Finance and Accountancy (CIPFA). It defines proper accounting practices for local authorities in the United Kingdom, and is generally abbreviated to 'the Code' in the text. The Code is based on International Financial Reporting Standards.

## **Collection Fund**

The fund deals with the collection and distribution of Council Tax and non-domestic rates. Surpluses may arise from time to time if the amounts collected from Council Tax (and its predecessor, community charge) exceed estimates. Such surpluses cannot be used directly to fund expenditure, but can be taken into account through the budget process and used to reduce Council Tax.

## **Community Assets**

Assets such as parks and historic buildings that the Council intends to hold in perpetuity and that may have restrictions on their disposal.

#### Consistency

The concept that the accounting treatment of any given item will remain consistent between accounting years and that any necessary change will be made clear to the reader of the statement of accounts.

## **Contingent Liabilities**

These are material liabilities where the contingent loss cannot be accurately estimated or is not considered sufficiently certain to include in the accounts. They are therefore brought to the attention of readers of the accounts as a note to the Balance Sheet.

#### Creditors

Amounts owed by the Council for work done, goods received or services rendered, but for which payment has not been made at the end of the year.

#### **Debtors**

Sums of money owed to the Council but not received at the end of the year.

## Depreciation

A capital charge made to services for the use of non-current assets in the provision of services. It represents the depletion of the useful life of an asset and the consequent reduction in its value.

## Finance Lease

A lease that transfers substantially all of the risks and rewards of ownership of a non current asset to the lessee. Consequently, the leased assets are recognised on the Balance Sheet of the lessee.

#### **Financial Instruments**

A financial instrument is defined as any contract that gives rise to a financial asset of one entity and a financial liability of another. The term covers both financial liabilities and financial assets and, includes the borrowing, lending, soft loans, financial guarantees and bank deposits of the Council.

#### Financial Reporting Standards (FRS)

Accounting practice to be followed in the preparation of accounting statements in the years prior to 2010-11. For example FRS17 governs the way in which pension liabilities must be presented in the accounts. From 2010-11 onwards FRS will be fully replaced by IFRS (International Financial Reporting Standards), see below.

#### **General Fund**

All services other than those which authorities are required to account for separately in a Housing Revenue Account or Collection Fund.

#### **General Reserves and Balances**

Monies held by the Council to deal with unforeseen events that might arise. The Council must maintain a prudent level of such balances.

#### **Group Accounts**

Where authorities have material interests in subsidiaries, associated companies or joint ventures they are required to prepare additional group account statements. The group accounts consolidate those interests in subsidiaries, associates and joint ventures with the Council's own accounts to present a complete picture of the Council's activities.

#### **Heritage Assets**

These are assets, previously classified as community assets, which are intended to be preserved in trust for future generations because of their cultural, environmental of historical associations.

#### International Financial Reporting Standards (IFRS)

These are accounting standards issued by the International Accounting Standards Board.

#### Impairment

A diminution in value of non-current assets resulting from obsolescence, physical damage or general market conditions. The Council undertakes annual reviews of its assets to identify impairment.

#### **Comprehensive Income and Expenditure Statement**

This statement is compiled in accordance with IFRS and reports the net cost for the year of the services provided by the Council. It brings together expenditure and income relating to all of the local authority's operations and demonstrates how the net cost has been financed from general government grants and income from local taxpayers.

#### Infrastructure Assets

These are assets such as highways and footpaths.

#### Investments

These may be long-term investments whose purpose is to produce capital gain and rental income, or the short-term investment of cash balances that may arise from day to day management of the Council's cash flow.

#### **Investment Properties**

Land and buildings that are held for capital gain and rental income and not for the provision of services.

## Joint Venture

A company or body in which decisions require the consent of all participants (see also Group Accounts).

#### Liabilities

Amounts due to individuals or organisations and to be paid at some time in the future. Current liabilities are payable within one year of the Balance Sheet date.

#### Local Area Agreement (LAA)

The LAA is a partnership between the Council and other public bodies whose aim is to work together towards jointly agreed objectives to improve local public services. The Council's LAA partners comprise local health bodies, learning bodies, community groups, housing associations and voluntary associations.

## Materiality

An item is material if its omission, non-disclosure or mis-statement in financial statements could be expected to lead to a distortion of the view given by the financial statements.

#### Minimum Revenue Provision (MRP)

This is the minimum amount of external borrowing that authorities must repay and charge to their revenue accounts each year. It is calculated as a percentage of the Council's capital financing requirement at the start of the year.

## **Non Current Assets**

Assets that yield economic benefits to the Council for a period of more than one year. Examples include land, buildings, vehicles and investment property.

## Non-Domestic Rates (NNDR)

These are rates levied on business properties. The level of NNDR charges is set by the Government. The Council receives 49% of the rates levied in the district, central government 50% and West Yorkshire Fire and Rescue Authority 1%.

#### **Net Book Value**

The amount at which non-current assets are included in the Balance Sheet, i.e. their historical cost or current value less the cumulative amounts provided for depreciation.

#### **Operating Leases**

Leases other than finance leases. Under operating leases the risks and rewards of ownership remain substantially with the lessor. Consequently, the assets concerned are not included on the Balance Sheet of the lessee.

#### Property, Plant and Equipment (PPE)

These are non-current assets used directly to deliver the Council's services. The assets comprise land, buildings and plant with a carrying value in the Balance Sheet based on current value in use. PPE also includes equipment like vehicles, which are valued at historic cost.

#### Precept

The amount levied by the various joint authorities (e.g. police and fire authorities) which is collected by the Council on their behalf through the Council Tax.

## **Prior Year Adjustments**

Material adjustments applicable to prior period, arising from changes in accounting policies or from other corrections.

## **Private Finance Initiative (PFI)**

A central government initiative that enables authorities to carry out capital projects through partnership with the private sector.

#### **Provisions**

Contributions to provisions are amounts charged to the revenue account during the year for costs with uncertain timing where a reliable estimate of the cost involved can be made.

#### Prudence

This accounting concept requires that revenue is not anticipated until realisation can be assessed with reasonable certainty. Provision is made for all known liabilities whether the amount is certain or can only be estimated in the light of the information available.

#### **Prudential Code**

The Code ensures that authorities borrow only for capital purposes and that they borrow responsibly and at affordable levels. Authorities demonstrate compliance with the code by setting and observing a range of prudential indicators covering the level of capital expenditure, the cost of borrowing and level and structure of its debt.

#### **Related Parties**

Individuals, or bodies, who have the potential to influence or control the Council or to be influenced or controlled by the Council.

## Revenue Expenditure

Expenditure on the day-to-day running costs of services, such as the costs of employees, premises, supplies and services.

### Revenue Expenditure Funded from Capital under Statute (REFCUS)

Amounts properly incurred as capital expenditure, but where no Council asset is created. They are mainly grants or loans made to individuals or organisations for capital purposes, such as improvement grants.

#### **Revenue Reserve**

Any sum set aside for a specific revenue purpose.

## **Revenue Support Grant (RSG)**

A general government grant towards the cost of providing services.

#### Subsidiary

A company or body over which the Council has control or has the right to exercise dominant influence (see also Group Accounts).

#### UKGAAP

UK Generally Accepted Accounting Principles. This is a framework of accounting standards for financial reporting standards, which have been replaced by International Financial Reporting Standards from 2010-11 onwards

Acronym	Full Description
AVCs	Additional Voluntary Contributions
BID	Business Improvement District
BDCT	Bradford District Care Trust
BPS	Base Points
BSF	Building Schools for the Future
BMW	Biodegradable Municipal Waste
CAA	Capital Adjustment Account
CCG	Clinical Commissioning Group
CFR	Capital Financing Requirement
CIES	Comprehensive Income & Expenditure Statement
CIPFA	Chartered Institute of Public Finance and Accountancy
CMT	Corporate Management Team
CPI	Consumer Price Index
CRC	Carbon Reduction Commitment
CSR	Comprehensive Spending Review
DEFRA	Department for Environment, Food and Rural Affairs
DfE	Department for Education
DRC	Depreciated Replacement Cost
DSG	Dedicated Schools Grant
EIR	Effective Interest Rate
EUV	Existing Use Value
FRS	Financial Reporting Standards
FSS	Funding Strategy Statement
GAAP	Generally Accepted Accounting Principles
HRA	Housing Revenue Account
IAS	International Accounting Standards
IASB	International Accounting Standards Board
IFRS	International Financial Reporting Standards
ISB	Individual School Budget
IT	Information Technology
JANES	Joint Arrangement which is not an Entity
LAA	Local Area Agreement
LATS	Landfill Allowances Trading Scheme
LEA	Local Education Authority
LEP	Local Education Partnership
LGPS	Local Government Pension Scheme
LOBO	Lender Option Borrower Option
MAP	Management Action Plans
MDCs	Metropolitan District Councils
MRP	Minimum Revenue Provision
NEET	Young people Not in Education, Employment or Training
NDR	Non Domestic Rates
NJC	National Joint Council
OJC	Officers' Joint Council
PFI	Private Funding Initiative
PfS	Partnership for Schools
PPE	Property, Plant & Equipment
PWLB	Public Works Loan Board
REFCUS	Revenue Expenditure Funded from Capital under Statute
RICS	Royal Institute of Chartered Surveyors
RPI	Retail Price Index
IXI I	Notali i not much

SIP	Statement of Investment Principles
SOLACE	Society of Local Authority Chief Executives
WDA	Waste Disposal Authority
WYCA	West Yorkshire Combined Authority
WYPF	West Yorkshire Pension Fund
VAT	Value Added Tax
YPO	Yorkshire Purchasing Organisation

# 1. Scope and Purpose

## 1.1 Scope of Responsibility

The City of Bradford Metropolitan District Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded, properly accounted for, and used economically, efficiently and effectively. It also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised.

In discharging its overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, as well as arrangements for the management of risk.

# 1.2 The Purpose of the Governance Framework

The governance framework comprises the systems and processes, culture and values by which the Council and its partners are directed and controlled and those activities through which it accounts to, engages with and leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.

The framework has continued in place at the Council for the year ended 31 March 2022 and up to the date of approval of the Statement of Accounts. Whilst supporting the Council's arrangements for risk management, it cannot eliminate all risk to the achievement of policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness.

## The Governance Framework.

The systems and processes that comprise the Council's governance framework consist of the following key elements:

## 2.1 Code of Corporate Governance.

The Council's Code of Corporate Governance adopts the seven core principles of the CIPFA/SOLACE framework "Delivering Good Governance in Local Government" –

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.
- Ensuring openness and comprehensive stakeholder engagement.
- Defining outcomes in terms of sustainable economic, social, and environmental benefits.
- Determining the interventions necessary to optimise the achievement of the intended outcomes.
- Developing the entity's capacity, including the capability of its leadership and the individuals within it.
- Managing risks and performance through robust internal control and strong public financial management.
- Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

## 2.2 The Constitution of the Council

The Constitution, reviewed at Annual Council on 18 May 2021 (and on 17 May 2022 in 2022/23), provides a framework for decision-making in accordance with legal requirements for the discharge of the Council's roles and functions. This includes the framework delegated below full Council within which the Executive and regulatory committees take decisions in discharge of the Council's executive and regulatory functions, subject to the examination of a number of Overview and Scrutiny Committees. Full Council, the Executive and committee members are collectively responsible for the decisions they make and the decision making arrangements are designed to be open, transparent and accountable to local people.

## 2.3 Covid Emergency Arrangements

Over the course of 2021/22 governance arrangements returned to normal including a return to in-person meetings of Full Council, Executive and all formal committee meetings as the Government lifted restrictions in Summer 2021 and made it clear that it would not pass emergency legislation to allow meetings of local authorities to be held remotely after 6 May 2021. The Council ensured that measures were in place to minimise the risk of COVID infection including the use of the Council Chamber for Executive meetings and the use of theatres to host some meetings of Full Council. The December 2021 meeting of full Council was cancelled and business deferred to January in the face of increasing numbers of infections of the Omicron variant of COVID-19. The Council's Corporate Management Team continued to meet twice weekly throughout the year.

- 3. Review of Effectiveness
- 3.1 The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by;
- 3.1.1 The work of the executive managers within the Council who have responsibility for the development and maintenance of the governance environment. Confirmations have been obtained from Strategic Directors and the Chief Executive that reasonable steps have been taken to ensure compliance with established policies, procedures, laws and regulations. They have been asked to confirm that risk management is embedded in their departments and ensure scrutiny of the annual managers' governance assurance responses (see 3.1.2 below).
- 3.1.2 The Council conducts an annual self-assurance process for managers on their compliance with key governance issues. The process targets different aspects of the governance framework each year. For 2021/22, the process covered the following areas;
  - Safeguarding
  - Equality
  - Service Governance
  - Performance
  - Response to Internal & External Reviews
  - Employee Code of Conduct
  - Conflicts of Interest
  - Whistleblowing
  - Health and Safety
  - Risk Management
  - Business Impact Analysis
  - Information Governance
  - Compliance with Council Financial Regulations
  - Procurement

The completed assessments are shared with Assistant Directors who subsequently provide a declaration that they have examined the results for their service areas, and taken corrective action to deal with any weaknesses identified. Completed assessments were provided to all Assistant Directors by their 4<sup>th</sup> tier managers, and a total of 109 assessments were made. The responses are also assessed by suitable specialist officers for each area listed above, with actions taken to address any lapses in compliance across the Council.

- 3.1.3 The Council's Code of Corporate Governance incorporates guidance from CIPFA and SOLACE, and sets out how the Council meets and demonstrates its commitment to good Corporate Governance. The management assurance process outlined above established a baseline for the level of compliance with the Council's code. A review of compliance with the core principles within the code has also been undertaken, led by the Council's Head of Internal Audit, Insurance and Risk.
- 3.1.4 Compliance with the CIPFA Financial Management Code, which was published in October 2019 and came into full effect in 2021/22. The Code provides guidance for good and sustainable financial management in local authorities and offers assurance that authorities are managing resources effectively.

A self-assessment against the Financial Management Standards within the Code was completed by the Director of Finance & IT, in conjunction with the Council leadership team, and taken to Governance and Audit Committee on 23 September 2021. This provided strong assurance of compliance against the requirements of the code. No material gaps were identified though opportunities for further improvement were recognised as part of continuous improvement processes.

- 3.1.5 The Council has in place a Governance and Audit Committee, independent of the Executive, to strengthen and consolidate its governance arrangements and provide the core functions as identified in CIPFA's "Audit Committees Practical Guidance for Local Authorities".
- 3.1.6 The review is also informed by the work of the Internal Audit section which covers both the Council and the West Yorkshire Pension Fund. The key areas of assurance relate to the work detailed in their monitoring reports on the Council's control environment which are provided at regular intervals to Governance and Audit Committee. The Head of Internal Audit, Insurance & Risk is required to deliver an Annual Internal Audit Opinion and report regularly to the Governance and Audit Committee as prescribed by Public Sector Internal Audit Standards. The scope of Internal Audit's work was restricted during 2021/22 due to ongoing limitations of home working arrangements, and the need for both Internal Audit and Services to prioritise the Council's response to Covid 19. This meant that planned audit coverage of fundamental and significant systems was reduced. However, from the work undertaken by Internal Audit throughout the year and taking into account other internal and external assurance processes, the Head of Internal Audit, Insurance & Risk provided an opinion to Governance and Audit Committee on 14 July 2022 that the overall internal control environment, risk management and governance framework of the Council is effective.
- 3.1.7 Action plans for improvement are devised and implemented in response to recommendations from Internal Audit, External Audit and other statutory agencies and inspectors. The Council liaises fully and promptly with the Local Government Ombudsman's enquiries into complaints against the Council.
- 3.1.8 The Council liaises closely with the Information Commissioner's Office in reporting and disclosing information security risks and incidents, and to ensure it discharges fully its duties under the Data Protection Act 2018.
- 3.2 The outcome of the review of effectiveness provided the necessary assurance, with the exception of the need to continue to improve Children's Safeguarding services (see 4.1.1 below).

## 4. Significant Governance Issues

4.1 The annual review has established that the Council has arrangements in place which provide a sound governance framework and system of internal control.

However, the issues raised in last year's statement include ongoing actions as outlined below;

# 4.1.1 Safeguarding Vulnerable Children

- We have developed a new comprehensive structure to meet demands. We are continuing all efforts to recruit and retain staff at all levels across children's social care services in the context of a shortage of qualified social workers nationally.
- We are facing growing demands for services and have seen a growth in the number of children looked after.
- There is a shortage of good quality placements nationally and this is driving the costs of care up significantly, placing further pressure on budgets.
- In the context of the cost of living crisis we anticipate a further growth in poverty and potentially neglect.
- There have been improvements in the Authority's residential provision for children noted in a number of inspections of children's homes.
- We have had positive feedback from Ofsted regarding progress made in Leaving Care services and services to exploited children.

## 4.1.2 Elective Home Education

Since the Covid-19 pandemic there has been a significant growth in the numbers of children being removed from school rolls to elective home education. This increases the risk of losses in education and subsequent learning gaps for pupils, lack of opportunities to socialise, potential impact on mental health, decline in school budgets to meet these needs given additional pressures and loss of earnings for Council commercialised services. 43% of the children being home educated have previous Children's Social Care involvement. Mental ill health is most often cited, and although some children have returned to roll since Covid, more children are being removed. There is a potential risk that children who are home educated may be perceived as 'unseen' and therefore possibly more at risk. However, the Local Authority has no grounds to insist on seeing these children. There are new requirements in the Schools Bill which require local authorities to keep a register of Children Not in School. This will require significant extra resource.

## 4.1.3 Ensuring an Effective, Integrated System of Health & Social Care.

The council was fully involved in the design and decision making to create a new distributed leadership model for the new health and care partnership in Bradford, District and Craven. These changes went live on 1 July 2022 with the implementation of the Health & Care Act 2022 which led to the end of Clinical Commissioning Groups as organisational entities and the formal adoption of Integrated Care Systems as the employer of these staff.

A new system strategy has been adopted, a new Memorandum of Understanding has been signed off by partners, our Better Care Fund plan was accepted by NHS England and a planning and commissioning forum oversees our joint commissioning arrangements.

The Strategic Director of Health and Wellbeing took an honorary contract as Director of Integration with Bradford District Foundation NHS Care Trust from 1 May 2022, to join their formal governance arrangements and lead on the integration of community and mental health with adult social care.

## 4.1.4 Key Staffing Skills

There continues to be a shortage of professional and skilled staff within the employment market leading to recruitment and retention difficulties to key posts. Inability to recruit in key disciplines could have a significant impact on the Council's ability to deliver services and support the Council's ambitions within the financial resources available.

In 2021/22, our actions have included;

- 439 young people started on Kickstart placements across the Council. The largest take up was in Business Admin support and continued to be a popular choice for young people. The Council is due to receive an update in March 2023 from the Department for Work and Pensions with the number of Council Kickstart placements that have led to successful employment. We know that 85 of our Council Kickstart placements have moved on to permanent employment from our scheme.
- The Council commenced a graduate scheme in November 2020. Three graduates were recruited as part of the National Graduate Development Programme (NGDP) in November 2020 and January 2021. A further 5 NGDP graduates were recruited through September and October 2022. Placements are offered across Departments with each graduate completing four placements in the two-year period they are with the Council. We are developing a graduate scheme for West Yorkshire Pension Fund and considering routes for other key areas across the Council as well as linking in with initiatives across our public sector system at a place level.

- We are using the apprenticeship levy to develop existing and new skills including those in professional and skilled roles. The 293 Live Council apprentices are made up of 57 apprentices in maintained schools, 61 new starters in the Council and 175 existing Council staff. The most popular apprenticeship jobs roles/sector qualifications for the 57 apprentices in schools are Early Years (47%), Teaching Assistant/Teacher (33%) Business Admin, Management and IT (20%), Council apprenticeships are in: Adult Care (25%), Management (18%), Building, Construction, Civil Engineering, Trades (14%) Children and Young People (8%), Production/Hospitality (7%), Business Admin (6%) Social Work (3%), and (22%) on other specialised apprenticeship training.
- In Children's Services we are focussed on attracting and retaining social workers through a dedicated "bring heart" campaign and microsite, and are developing an ambitious Assessed & Supported Year in Employment (ASYE) academy to grow our own given the national shortages of experienced Level 3 Social Workers, are recruiting international Social Workers and Students and are partnering with the University.
- We continue to review our approach to total rewards and development and include this
  as part of our wider attraction strategy, and have re-published our offer during September
  2022 with staff and in recruitment. We have consulted on and implemented a recruitment
  and retention market supplement policy, and updated our relocation scheme to help
  attract and retain talent in hard to fill roles.
- Workforce planning is progressing in services, prioritising Legal, highways, transport, planning and social work, and a refresh and review of job evaluation and grading schemes is underway.

- 5. Further 2022/23 Governance Challenges
- 5.1 The Council has specifically recognised two further challenges that will be monitored through 2022/23 as outlined below:

## 5.1.1 Budget pressures

The Quarterly Budget Monitoring report to the July Executive and the Medium Term Financial Strategy report to the September Executive have both highlighted the significant financial impact of inflationary cost of living increases, which will impact both the Council budget position and the wider District as impacts are felt to individuals and businesses.

This is the current major significant factor that may impact future governance arrangements. The issue is subject to detailed and thorough discussions at Council Management Team and Joint Leadership Team as actions are sought to mitigate impacts where possible.

## 5.1.2 Procurement

The timeliness of procurement processes has necessitated the Council extending some contracts beyond their end dates rather than going out to competition beforehand. Applying extensions is a valid procurement route but may have sometimes been used as the preferred option rather than a fully considered option. The service is currently without a Head of Service following the former Head leaving, whilst there are also a number of senior vacancies within the service. A campaign is underway to appoint a new Head of Service and to attract candidates into the service to fill vacancies. Appointment of a new Head of Service in November 2022 is expected to drive improvement in compliance with existing procurement processes to secure contracts in advance. In the interim the engagement of consultancy experts to provide strategic advice, alongside an end-to-end procurement review will ensure the ongoing effectiveness of procurement processes.

## West Yorkshire Pension Fund

The Council is the administering authority for West Yorkshire Pension Fund (WYPF). WYPF produces its own Governance Compliance statement which has been prepared in accordance with the requirements of the provisions of the Local Government Pension Scheme (LGPS) Regulations 2013 (Regulation 55) and its predecessor, Regulation 31 of the LGPS 2008.

The Council's Governance and Audit Committee has legal and strategic responsibility for WYPF. The Council has established three bodies to assist and support the Governance & Audit Committee oversee WYPF:

- WYPF Investment Advisory Panel
- WYPF Joint Advisory Group
- WYPF Pension Board

WYPF Investment Advisory Panel has overall responsibility for overseeing and monitoring the management of WYPF's investment portfolio and investment activity. In this capacity, the Panel is responsible for formulating the broad future policy for investment.

WYPF Joint Advisory Group has overall responsibility for overseeing and monitoring the WYPF's pensions administration function, and for reviewing and responding to proposed changes to the Local Government Pension Scheme. In addition, the Group approves the budget estimates for the pensions administration and investment management functions of WYPF, and also receives WYPF's Annual Report and Accounts.

WYPF Pension Board's role is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the LGPS including:

- securing compliance with the LGPS regulations and any other legislation relating to governance and administration of the LGPS;
- securing compliance with the requirements imposed in relation to the LGPS by The Pensions Regulator (TPR);
- any other such matters as the LGPS regulations may specify.

The Council is also responsible for the financial and management arrangements of the West Yorkshire Pension Fund and a separate assessment of the adequacy of these arrangements is also required. The following internal arrangements are in place to provide the Council with the necessary assurance.

- West Yorkshire Pension Fund has adopted the Council approved approach to risk management.
- Risk registers are maintained and management action plans (MAPs) are in place for risks assessed as requiring active management.

- Risks are monitored and MAPs reassessed regularly.
- A risk management report is submitted annually to the WYPF Investment Advisory Panel and Joint Advisory Group.

The risk register and operational results were reported to the Investment Advisory Panel and Joint Advisory Group on the 28 July 2022.

## 7. Statement

We are satisfied that an effective system of internal control has been in place throughout the financial year and is on-going. Over the coming year we propose to take steps to address the challenges identified above to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

Signed:

Councillor Susan Hinchcliffe, Leader of Council

Sum Anchello

Kosten Englad.

Signed:

Kersten England CBE, Chief Executive



# Report of the Director of Finance to the meeting of Governance and Audit to be held on 15 June 2023

C

# Subject:

**Annual Treasury Management Report 2022-23** 

# **Summary statement:**

This report shows the Council's Treasury Management activities for the year ending 31 March 2023

## **EQUALITY & DIVERSITY:**

Equality assessments and Equality objectives – There are no equality and

Christopher Kinsella Director of Finance Portfolio: Corporate Services

Colin Standish Chief Investment Officer Overview & Scrutiny Area:

Phone: (01274) 43 2361 E-mail: Colin.Standish@wypf.org.uk **Corporate Services** 

diversity implications directly arising from this report.

## **Annual Treasury Management Review 2022-23**

## 1. Introduction

This Council is required by regulations issued under the Local Government Act 2003 to produce an annual treasury management review of activities and the actual prudential and treasury indicators for 2022-23. This report meets the requirements of both the CIPFA Code of Practice on Treasury Management, (the Code), and the CIPFA Prudential Code for Capital Finance in Local Authorities, (the Prudential Code).

During 2022-23 the minimum reporting requirements were that the full Council should receive the following reports:

- an annual treasury strategy in advance of the year (Governance and Audit Committee 24/03/2022 and Council 17/05/2022)
- a mid-year, (minimum), treasury update report (Governance and Audit Committee 24/11/2022 and Council 13/12/2022)
- an annual review following the end of the year describing the activity compared to the strategy, (this report)

The regulatory environment places responsibility on members for the review and scrutiny of treasury management policy and activities. This report is, therefore, important in that respect, as it provides details of the outturn position for treasury activities and highlights compliance with the Council's policies previously approved by members.

This Council confirms that it has complied with the requirement under the Code to give prior scrutiny to all of the above treasury management reports by the Governance and Audit Committee before they were reported to the full Council.

Member training on treasury management issues was undertaken during the year on 24<sup>th</sup> November 2022 in order to support members' scrutiny role.

## 2. Overall Treasury Position as at 31st March 2023

The Council's treasury management debt and investment position is organised by the treasury management service, in order to ensure adequate liquidity for revenue and capital activities, security for investments and to manage risks within all treasury management activities. Procedures and controls to achieve these objectives are well established both through member reporting detailed in the summary, and through officer activity, detailed in the Council's Treasury Management Practices.

At the end of 2022-23 the Council's treasury, (including borrowing by PFI and finance leases), position was as follows:

	31 March 2022 Principal £'m	Rate/ Return	31 March 2023 Principal £'m	Rate/ Return
Fixed rate funding:				
-PWLB	292.3		366.8	
-Market	36.2	4.79%	36.2	4.79%
-Other	5.6		12.1	
PFI and other finance leases	146.9		138.2	
Short term borrowing	37.0		50.0	
Total debt	518.0		603.3	
CFR	709.2		766.7	
Over / (under) borrowing	(191.2)		(163.4)	
Total investments	186.1	0.13%	48.3	1.57%
Net debt	331.9		555.0	

## 3. Prudential Indicators

# 3.1 The Council's Capital Expenditure and Financing

The Council undertakes capital expenditure on long-term assets. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.), which has no resultant impact on the Council's borrowing need; or
- If insufficient financing is available, or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

Actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed. Capital expenditure has increased compared to the previous year as the Council has a number of large construction schemes underway.

	2021-22 Actual	2022-23 Estimate as at Q2	2022-23 Actual
	£'m	£'m	£'m
Capital expenditure	105.1	170.4	154.1
Financed in year	70.1	87.4	76.7
Unfinanced capital expenditure	35.0	83.0	77.4

# 3.2 The Council's Overall Borrowing Need

The Council's underlying need to borrow for capital expenditure is termed the Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure, which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so the underlying borrowing need. Any capital expenditure above, which is not immediately paid for through a revenue or capital resource, will increase the CFR.

Part of the Council's treasury activities is to address the funding requirements for this borrowing need. Depending on the capital expenditure programme, the treasury service organises the Council's cash position to ensure that sufficient cash is available to meet the capital plans and cash flow requirements. This may be sourced through borrowing from external bodies, (such as the Government, through the Public Works Loan Board [PWLB], or the money markets), or utilising temporary cash resources within the Council.

The Council's underlying borrowing need (CFR) is not allowed to rise indefinitely. Statutory controls are in place to ensure that capital assets are broadly charged to revenue over the life of the asset. The Council is required to make an annual revenue charge, called the Minimum Revenue Provision – MRP, to reduce the CFR. This is effectively a repayment of the non-Housing Revenue Account (HRA) borrowing need. This differs from the treasury management arrangements which ensure that cash is available to meet capital commitments. External debt can also be borrowed or repaid at any time, but this does not change the CFR.

The total CFR can also be reduced by:

- the application of additional capital financing resources, (such as unapplied capital receipts); or
- charging more than the statutory revenue charge (MRP) each year through a Voluntary Revenue Provision (VRP).

The MRP Policy adopted in the original Treasury Management Strategy Report for 2022-23, approved by the Council on 17-05-2022, was subject to revision during the year. The Council's updated 2022-23 MRP Policy, (as required by the Department for Levelling Up, Housing and Communities (DLUHC) Guidance), was approved as part of the Budget Report for 2022-23 on 23<sup>rd</sup> February 2023.

The Council's CFR for the year is shown below, and represents a key prudential indicator. It includes PFI and leasing schemes on the balance sheet, which increase the Council's borrowing need. No borrowing is actually required against these schemes as a borrowing facility is included in the contract.

CFR	31 March 2022 Actual £'m	31 March 2023 Budget £'m	31 March 2023 Actual £'m
Opening balance	698.8	755.0	709.2
Add unfinanced capital expenditure	35.0	103.0	77.4
Less MRP	(20.0)	(22.0)	(16.7)
Less PFI & finance lease repayments	(4.6)	(5.0)	(3.2)
Closing balance	709.2	831.0	766.7

To ensure that borrowing levels are prudent over the medium term and only for a capital purpose, the Council should ensure that its gross external borrowing does not, except in the short term, exceed the total of the capital financing requirement in the preceding year (21-22), plus the estimates of any additional capital financing requirement for the current year (2022-23) and next two financial years. This essentially means that the Council is not borrowing to support revenue expenditure. The Council has complied with this prudential indicator.

The table below highlights the Council's gross borrowing position against the CFR. The CFR figure is less than budgeted due to slippage on the capital programme, which has resulted in a lower requirement to borrow.

	31 March 2022 Actual £'m	31 March 2023 Budget £'m	31 March 2023 Actual £'m
Capital Financing Requirement	709.2	831.0	766.7
Gross borrowing position	518.0	574.8	603.3
(Under) / over funding of CFR	191.2	256.2	163.4

# 3.3 Treasury Indicators

**The authorised limit** - the authorised limit is the "affordable borrowing limit" required by section 3 of the Local Government Act 2003. Once this has been set, the Council does not have the power to borrow above this level. The table below demonstrates that during 2022-23 the Council has maintained gross borrowing within its authorised limit.

**The operational boundary** – the operational boundary is the expected borrowing position of the Council during the year. Periods where the actual position is either below or over the boundary are acceptable, subject to the authorised limit not being breached.

**Actual financing costs as a proportion of net revenue stream -** this indicator identifies the trend in the cost of capital, (borrowing and other long term obligation costs net of investment income), against the net revenue stream to be met from government grants and local taxpayers.

	2022-23 £'m
Authorised limit	860.0
Maximum gross borrowing position during the year	603.3
Operational boundary	840.0
Financing costs as a proportion of net revenue stream	12.6%

The maturity structure of the debt portfolio was as follows:

	31 March 2022 Actual £'m	31 March 2023 Actual £'m
Under 12 months	67.5	58.5
12 months and within 24 months	6.5	9.7
24 months and within 5 years	37.3	64.1
5 years and within 10 years	54.6	56.3
10 years and within 20 years	45.0	57.0
20 years and within 30 years	15.0	40.0
30 years and within 40 years	86.4	71.6
40 years and within 50 years	58.8	107.9

# 4. The Treasury Strategy for 2022-23

## 4.1 Investment strategy and control of interest rate risk

Investment returns picked up throughout the course of 2022-23 as central banks, including the Bank of England, realised that inflationary pressures were not transitory, and that tighter monetary policy was called for.

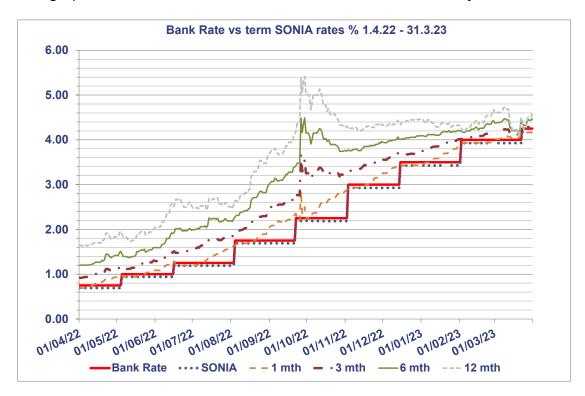
Starting April at 0.75%, Bank Rate moved up in stepped increases of either 0.25% or 0.5%, reaching 4.25% by the end of the financial year, with the potential for a further one or two increases in 2023-24.

The sea-change in investment rates meant local authorities were faced with the challenge of pro-active investment of surplus cash for the first time in over a decade, and this emphasised the need for a detailed working knowledge of cash flow projections so that the appropriate balance between maintaining cash for liquidity purposes, and "laddering" deposits on a rolling basis to lock in the increase in investment rates as duration was extended, became an on-going feature of the investment landscape.

With bond markets selling off, equity valuations struggling to make progress and, latterly, property funds enduring a wretched Q4 2022, the more traditional investment options, such as specified investments (simple to understand, and less than a year in duration) became more actively used.

Meantime, through the autumn, and then in March 2023, the Bank of England maintained various monetary policy easing measures as required to ensure specific markets, the banking system and the economy had appropriate levels of liquidity at times of stress.





FINANCIAL YEAR TO QUARTER ENDED 31/3/2023						
	Bank Rate	SONIA	1 mth	3 mth	6 mth	12 mth
High	4.25	4.18	4.17	4.30	4.49	5.41
High Date	23/03/2023	31/03/2023	31/03/2023	31/03/2023	29/09/2022	29/09/2022
Low	0.75	0.69	0.69	0.92	1.20	1.62
Low Date	01/04/2022	28/04/2022	01/04/2022	01/04/2022	07/04/2022	04/04/2022
Average	2.30	2.24	2.41	2.72	3.11	3.53
Spread	3.50	3.49	3.48	3.38	3.29	3.79

While the Council has taken a cautious approach to investing, it is also fully appreciative of changes to regulatory requirements for financial institutions in terms of additional capital and liquidity that came about in the aftermath of the Great Financial Crisis of 2008-09. These requirements have provided a far stronger basis for financial institutions, with annual stress tests by regulators evidencing how institutions are now far abler to cope with extreme stressed market and economic conditions.

Investment balances have been kept to a minimum through the agreed strategy of using reserves and balances to support internal borrowing, rather than borrowing externally from the financial markets. External borrowing incurs an additional cost, due to the differential between borrowing and investment rates as illustrated in the charts shown above and Appendix 2. Such an approach has also provided benefits in terms of reducing counterparty risk exposure, by having fewer investments placed in the financial markets.

## 4.2 Investment Outturn 22-23

The Councils investment position at the end of 2022-23 is summarised below

INIVESTMENT PORTESTIO	202	1-22	2022-23		
INVESTMENT PORTFOLIO	£'m	%	£'m	%	
Treasury investments					
Banks	103.5m	55	-	-	
DMADF	5.0m	3	-	-	
Money Market Funds	77.6m	42	48.3	100	
Total managed in house	186.1m	100	48.3	100	

The maturity structure of the investment portfolio was as follows:

	2021-22 Actual £'m	2022-23 Actual £'m
Investments Longer than 1 year Up to 1 year	0.0 186.1	0.0 48.3

The Council's investment policy is governed by DLUHC investment guidance, which has been implemented in the annual investment strategy approved by the Council on 17/05/22. This policy sets out the approach for choosing investment counterparties, and is based on credit ratings provided by the three main credit rating agencies, supplemented by additional market data, (such as rating outlooks, credit default swaps, bank share prices etc.).

The investment activity during the year conformed to the approved strategy, and the Council had no liquidity difficulties. How-ever cash balances have reduced during the year and the strategy will need to be reviewed during 2023-24.

**Investments held by the Council** - The Council maintained an average balance of £33.75m of internally managed funds. The internally managed funds earned an average rate of return of 2.85%. The comparable performance indicator is the average overnight SONIA rate was 2.304%. The total investment income was £1.424m.

## 5.Borrowing

## 5.1 Borrowing strategy and control of interest rate risk

Borrowing is undertaken to fund net unfinanced capital expenditure and naturally maturing debt and also to maintain cash flow liquidity requirements. During 2022-23, the Council maintained an under-borrowed position. This meant that the capital borrowing need, (the Capital Financing Requirement), was not fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow was used as an interim measure. This strategy was prudent as investment returns were very low and minimising counterparty risk on placing investments also needed to be considered.

A cost of carry generally remained in place during the year on any new long-term borrowing that was not immediately used to finance capital expenditure, as it would have caused a temporary increase in cash balances; this would have incurred a revenue cost – the difference between (higher) borrowing costs and (lower) investment returns.

The policy of avoiding new borrowing by running down spare cash balances has served well over the last few previous years. However, due to an increase in capital spend and a reduction in reserves and balances there was a need to complete additional PWLB Borrowing. New loans totalling £90m, with an average rate of interest of 3.89% have been completed during 2022-23.

Against this background and the risks within the economic forecast, caution was adopted with the treasury operations. The Director of Finance therefore monitored interest rates in financial markets and adopted a pragmatic strategy based upon the following principles to manage interest rate risks:

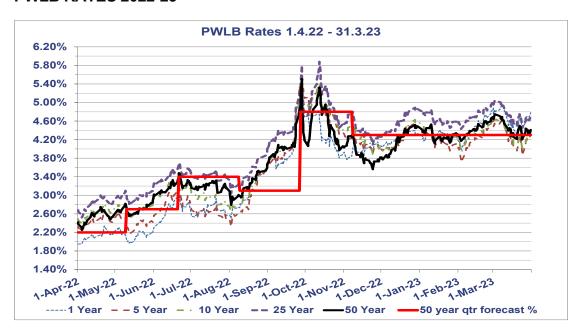
- if it had been felt that there was a significant risk of a sharp FALL in long and short term rates, (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings would have been postponed, and potential rescheduling from fixed rate funding into short term borrowing would have been considered.
- if it had been felt that there was a significant risk of a much sharper RISE in long and short term rates than initially expected, perhaps arising from an acceleration in the start date and in the rate of increase in central rates in the USA and UK, an increase in world economic activity or a sudden increase in inflation risks, then the portfolio position would have been reappraised. Most likely, fixed rate funding would have been drawn whilst interest rates were lower than they were projected to be in the next few years.

Interest rate forecasts were initially suggesting only gradual rises in short, medium and longer-term fixed borrowing rates during 2022-23 but by August it had become clear that inflation was moving up towards 40-year highs, and the Bank of England engaged in monetary policy tightening at every Monetary Policy Committee meeting during 2022, and into 2023, either by increasing Bank Rate by 0.25% or 0.5% each time. Currently the CPI measure of inflation is still above 10% in the UK

but is expected to fall back towards 4% by year end. Nonetheless, there remain significant risks to that central forecast.

Link Group Interest Rate View	7.2.22											
	Jun-22	Sep-22	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25
BANK RATE	1.00	1.00	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25
3 month ave earnings	1.00	1.00	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20
6 month ave earnings	1.10	1.20	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30
12 month ave earnings	1.50	1.60	1.70	1.70	1.60	1.60	1.50	1.40	1.40	1.40	1.40	1.40
5 yr PWLB	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30
10 yr PWLB	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40
25 yr PWLB	2.50	2.50	2.60	2.60	2.60	2.60	2.60	2.60	2.60	2.60	2.60	2.60
50 yr PWLB	2.30	2.30	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40

## **PWLB RATES 2022-23**



PWLB rates are based on gilt (UK Government bonds) yields through HM Treasury determining a specified margin to add to gilt yields. The main influences on gilt yields are Bank Rate, inflation expectations and movements in US treasury yields. Inflation targeting by the major central banks has been successful over the last 30 years in lowering inflation and the real equilibrium rate for central rates has fallen considerably due to the high level of borrowing by consumers: this means that central banks do not need to raise rates as much now to have a major impact on consumer spending, inflation, etc. This has pulled down the overall level of interest rates and bond yields in financial markets over the last 30 years. Indeed, in recent years many bond yields up to 10 years in the Eurozone turned negative on expectations that the EU would struggle to get growth rates and inflation up from low levels. In addition, there has, at times, been an inversion of bond yields in the US whereby 10-year yields have fallen below shorter-term yields. In the past, this has been a precursor of a recession.

However, since early 2022, yields have risen dramatically in all the major developed economies, first as economies opened post-Covid; then because of the inflationary impact of the war in Ukraine in respect of the supply side of many goods. In particular, rising cost pressures emanating from shortages of energy and some

food categories have been central to inflation rising rapidly. Furthermore, at present the FOMC, ECB and Bank of England are all being challenged by persistent inflation that is exacerbated by very tight labour markets and high wage increases relative to what central banks believe to be sustainable.

# Graph of UK gilt yields v. US treasury yields



Gilt yields have been on a continual rise since the start of 2021, peaking in the autumn of 2022. Currently, yields are broadly range bound between 3% and 4.25%.

At the close of the day on 31 March 2023, all gilt yields from 1 to 50 years were between 3.64% and 4.18%, with the 1 year being the highest and 6-7.5 years being the lowest yield.

Regarding PWLB borrowing rates, the various margins attributed to their pricing are as follows: -

- **PWLB Standard Rate** is gilt plus 100 basis points (G+100bps)
- PWLB Certainty Rate is gilt plus 80 basis points (G+80bps)
- Local Infrastructure Rate is gilt plus 60bps (G+60bps)

There is likely to be a fall in gilt yields and PWLB rates across the whole curve over the next one to two years as Bank Rate first rises to dampen inflationary pressures and a tight labour market, and is then cut as the economy slows, unemployment rises, and inflation (on the Consumer Price Index measure) moves closer to the Bank of England's 2% target.

As a general rule, short-dated gilt yields will reflect expected movements in Bank Rate, whilst medium to long-dated yields are driven primarily by the inflation outlook.

The Bank of England is also embarking on a process of Quantitative Tightening, but the scale and pace of this has already been affected by the Truss/Kwarteng "fiscal experiment" in the autumn of 2022 and more recently by the financial market

unease with some US (e.g., Silicon Valley Bank) and European banks (e.g., Credit Suisse). The gradual reduction of the Bank's original £895bn stock of gilt and corporate bonds will be sold back into the market over several years. The impact this policy will have on the market pricing of gilts, while issuance is markedly increasing, is an unknown at the time of writing.

# 5.2 Borrowing Outturn 2022-23

£15.511m of loans matured in January and February 2023 with an average rate of 6.85%. Due to increased capital spend and a reduction in reserve balances new loans of £90m were undertaken this year with an average rate of interest of 3.89%.

**Summary of debt transactions** – management of the debt portfolio resulted in a fall in the average interest rate of 0.24%.

# 5.3 Borrowing in advance of need

The Council has not borrowed more than, or in advance of its needs, purely in order to profit from the investment of the extra sums borrowed.

## 5.4 Rescheduling

No rescheduling was done during the year as the average 1% differential between PWLB new borrowing rates and premature repayment rates made rescheduling unviable.

## 6. Other Issues

6.1 None

## 7. Changes to the Treasury Management Policy

7.1 None

## 8. Financial and Resources Appraisal

8.1 The financial implications are set out in section 1 to 8 of this report

## 9. Risk Management and Governance Issues

9.1 The principal risks associated with treasury management are:

## Risk: Loss of investments as a result of failure of counterparties.

Mitigation: Limiting the types of investment instruments used, setting lending criteria for counterparties, and limiting the extent of exposure to individual counterparties.

Risk: That the Council will commit too much of its investments in fixed term investments and might have to recall investments prematurely resulting in possible additional costs or new borrowing (Liquidity risk).

Mitigation: Ensuring that a minimum proportion of investments are held in short term investments for cash flow purposes.

Risk: Increase in the net financing costs of the Council due to borrowing at high rates of interest.

Mitigation: Planning and undertaking borrowing and lending in light of assessments of future interest rate movements, and by undertaking mostly long term borrowing at fixed rates of interest (to reduce the volatility of capital financing costs).

Risk: Higher interest rates increase borrowing making it more difficult to self-finance capital schemes. Debt servicing becomes less affordable and less sustainable and crowds out revenue <u>spend</u>.

Mitigation: To pause, delay or defer capital schemes. Also review opportunities to borrow in the future at current interest rates.

Risk: Return on non-treasury investments lower than expected.

Mitigation: Review and analysis of risk prior to undertaking non-treasury investments.

Risk: The Council's Minimum Revenue Policy charges an insufficient amount to the Revenue Estimates to repay debt.

Mitigation: Align the Minimum Revenue Policy to the service benefit derived from the Council's assets.

Risk: Associated with cash management, legal requirements and fraud. Mitigation: These risks are managed through:

- Treasury Management Practices covering all aspects of Treasury management procedures including cash flow forecasting, documentation, monitoring, reporting and division of duties.
- All Treasury management procedures and transactions are subject to inspection by internal and external auditors. The Council also employs external financial advisors to provide information on market trends, credit rating alerts, lending criteria advice and investment opportunities.

Risk: Increase in capital financing costs due to inflationary forces resulting in increased cost pressures on current capital projects and higher costs compared to approved budgets.

Mitigation: Regular monitoring of the capital programme through comparison to budgets.

Risk: Anticipated borrowing is lower than expected because the 2023-24 capital programme is underspent. This is explained in more detail below, together with the actions being taken to reduce these risks:

Mitigation: The Council is required to set a balanced budget for its revenue estimates; so in broad terms, income received will match expenditure over the 2023-24 financial year. The 2023-24 revenue estimates cause only temporary cash

flow differences, for example when income is received in a different month to when the expenditure is incurred.

However, the 2023-24 capital budget will cause a cash flow shortfall in the long term, which generates a borrowing requirement. While some of the capital budget is funded immediately, mainly with Government grants, other elements are not funded initially, leading to the cash flow deficit that requires borrowing.

Managing borrowing is part of the Treasury Management role. To help in its management, the Treasury Strategy identifies the element within the capital budget that is not funded straightaway, to anticipate the Council's borrowing requirement.

However, when the capital budget is underspent, the Council has a lower borrowing requirement than anticipated. This risk is managed in practice because the Council only borrows when there is an actual cash flow shortage. The uncertainty around spend against the capital budget makes cash flow management more difficult. For example, it is less likely that the Council would take advantage of a short-term fall in interest rates, without more certainty around the timing of any borrowing need. Actions that have taken place to manage the risks relating to this uncertainty in the timing of capital spend are: Councillor and Officer challenge sessions on the capital budget; increased scrutiny of the capital forecasts in the quarterly monitoring, and the collection of additional documentation around the critical paths of individual schemes.

# 10. Legal Appraisal

10.1 Any relevant legal considerations are set out in the report

## 11. Other Implications

- 11.1 Equality & Diversity no direct implications
- 11.2 Sustainability implications no direct implications
- 11.3 Green house Gas Emissions Impact no direct implications
- 11.4 Community safety implications no direct implications
- 11.5 Human Rights Act no direct implications
- 11.6 Trade Unions no direct implications
- 11.7 Ward Implications no direct implications
- 11.8 Implication for Corporate Parenting no direct implications
- 11.9 Issues arising from Privacy Impact Assessment- no direct implications

## 12. Not for publications documents

12.1 None

## 13. Options

13.1 None

## 14. Recommendations

14.1 That the report be noted by the Governance and Audit Committee and passed to full Council for adoption. This includes the actual 2022-23 prudential and treasury indicators in the report

## 15. Appendices

Appendix 1 Prudential and Treasury Indicators

Appendix 2 Borrowing and Investment Rates

Appendix 3 The Economy and Interest Rates

Appendix 4 Approved Counties for Investments as at 31st March 2023

# **Appendix 1: Prudential and Treasury indicators**

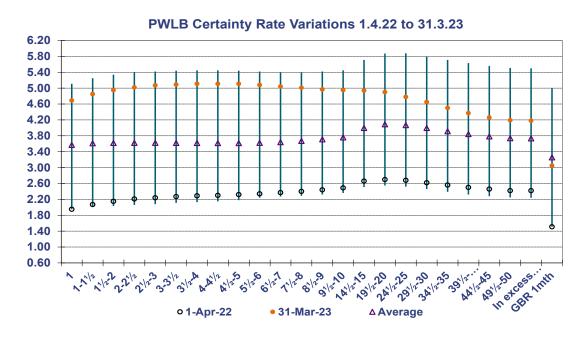
1. PRUDENTIAL INDICATORS	2021-22 Actual £'000	2022-23 Estimate £'000	2022-23 Actual £'000
Capital Expenditure	105,085	170,400	154,084
Ratio of financing costs to net revenue stream	13.2%	15.3%	12.6%*
Gross borrowing requirement General Fund	518,111	574,800	603,334
Capital Financing Requirement	709,246	831,000	766,735

<sup>\*</sup>Note in future years some of the forecast debt will be directly funded by self-financing schemes, where income is generated to meet the cost of investment in the scheme.

2. TREASURY MANAGEMENT INDICATORS	2021-22 Actual £'000	2022-23 Estimate £'000	2022-23 Actual £'000
Authorised Limit for external debt			
borrowing	371,111	651,900	465,115
other long term liabilities	146,900	138,100	138,219
TOTAL	518,011	790,000	603,334
Operational Boundary for external debt			
borrowing	371,111	631,900	465,115
other long term liabilities	146,900	138,100	138,219
TOTAL	518,011	770,000	603,334
Actual external debt	518,011		603,334

Maturity structure of fixed rate borrowing during 2022-23	upper limit	lower limit
under 12 months	20%	0%
12 months and within 24 months	20%	0%
24 months and within 5 years	50%	0%
5 years and within 10 years	50%	0%
10 years and within 20 years	90%	0%
20 years and within 30 years	90%	0%
30 years and within 40 years	90%	0%
40 years and within 50 years	90%	0%
Maturity structure of investments during 2022-23	upper limit	lower limit
Longer than 1 year	£20m	£0m

**Appendix 2: Borrowing and Investment Rates** 



## HIGH/LOW/AVERAGE PWLB RATES FOR 2022-23

	1 Year	5 Year	10 Year	25 Year	50 Year
Low	1.95%	2.18%	2.36%	2.52%	2.25%
Date	01/04/2022	13/05/2022	04/04/2022	04/04/2022	04/04/2022
High	5.11%	5.44%	5.45%	5.88%	5.51%
Date	28/09/2022	28/09/2022	12/10/2022	12/10/2022	28/09/2022
Average	3.57%	3.62%	3.76%	4.07%	3.74%
Spread	3.16%	3.26%	3.09%	3.36%	3.26%

## **Appendix 3: The Economy and Interest Rates**

## UK. Economy.

Against a backdrop of stubborn inflationary pressures, the easing of Covid restrictions in most developed economies, the Russian invasion of Ukraine, and a range of different UK Government policies, it is no surprise that UK interest rates have been volatile right across the curve, from Bank Rate through to 50-year gilt yields, for all of 2022-23.

Market commentators' misplaced optimism around inflation has been the root cause of the rout in the bond markets with, for example, UK, EZ and US 10-year yields all rising by over 200bps in 2022. The table below provides a snapshot of the conundrum facing central banks: inflation is elevated but labour markets are extra-ordinarily tight, making it an issue of fine judgment as to how far monetary policy needs to tighten.

	UK	Eurozone	US
Bank Rate	4.25%	3%	4.75%-5%
GDP	0.1%q/q Q4 (4.1%y/y)	+0.1%q/q Q4 (1.9%y/y)	2.6% Q4 Annualised
Inflation	10.4%y/y (Feb)	6.9%y/y (Mar)	6.0%y/y (Feb)
Unemployment Rate	3.7% (Jan)	6.6% (Feb)	3.6% (Feb)

Q2 of 2022 saw UK GDP deliver growth of +0.1% q/q, but this was quickly reversed in the third quarter, albeit some of the fall in GDP can be placed at the foot of the extra Bank Holiday in the wake of the Queen's passing. Q4 GDP was positive at 0.1% q/q. Most recently, January saw a 0.3% m/m increase in GDP as the number of strikes reduced compared to December. In addition, the resilience in activity at the end of 2022 was, in part, due to a 1.3% q/q rise in real household disposable incomes. A big part of that reflected the £5.7bn payments received by households from the government under the Energy Bills Support Scheme.

Nevertheless, CPI inflation picked up to what should be a peak reading of 11.1% in October, although hopes for significant falls from this level will very much rest on the movements in the gas and electricity markets, as well as the supply-side factors impacting food prices. On balance, most commentators expect the CPI measure of inflation to drop back towards 4% by the end of 2023. As of February 2023, CPI was 10.4%.

The UK unemployment rate fell through 2022 to a 48-year low of 3.6%, and this despite a net migration increase of c500k. The fact remains, however, that with many economic participants registered as long-term sick, the UK labour force shrunk by c500k in the year to June. Without an increase in the labour force participation rate, it is hard to see how the UK economy will be able to grow its way to prosperity, and with average wage increases running at over 6% the MPC will be concerned that wage inflation will prove just as sticky as major

supply-side shocks to food (up 18.3% y/y in February 2023) and energy that have endured since Russia's invasion of Ukraine on 22 February 2022.

Bank Rate increased steadily throughout 2022/23, starting at 0.75% and finishing at 4.25%.

In the interim, following a Conservative Party leadership contest, Liz Truss became Prime Minister for a tumultuous seven weeks that ran through September and October. Put simply, the markets did not like the unfunded tax-cutting and heavy spending policies put forward by her Chancellor, Kwasi Kwarteng, and their reign lasted barely seven weeks before being replaced by Prime Minister Rishi Sunak and Chancellor Jeremy Hunt. Their Autumn Statement of the 17<sup>th</sup> of November gave rise to a net £55bn fiscal tightening, although much of the "heavy lifting" has been left for the next Parliament to deliver. However, the markets liked what they heard, and UK gilt yields have reversed the increases seen under the previous tenants of No10/11 Downing Street, although they remain elevated in line with developed economies generally.

As noted above, GDP has been tepid throughout 2022/23, although the most recent composite Purchasing Manager Indices for the UK, US, EZ and China have all surprised to the upside, registering survey scores just above 50 (below suggests economies are contracting, and above suggests expansion). Whether that means a shallow recession, or worse, will be avoided is still unclear. Ultimately, the MPC will want to see material evidence of a reduction in inflationary pressures and a loosening in labour markets. Realistically, that is an unlikely outcome without unemployment rising and wage settlements falling from their current levels. At present, the bigger rise in employment kept the ILO unemployment rate unchanged at 3.7% in January. Also, while the number of job vacancies fell for the ninth consecutive month in February, they remained around 40% above pre-pandemic levels.

Our economic analysts, Capital Economics, expect real GDP to contract by around 0.2% q/q in Q1 and forecast a recession this year involving a 1.0% peak-to-trough fall in real GDP.

The £ has remained resilient of late, recovering from a record low of \$1.035, on the Monday following the Truss government's "fiscal event", to \$1.23. Notwithstanding the £'s better run of late, 2023 is likely to see a housing correction of some magnitude as fixed-rate mortgages have moved above 4.5% and affordability has been squeezed despite proposed Stamp Duty cuts remaining in place.

As for equity markets, the FTSE 100 started 2023 strongly, rising to a record high of 8,014 on 20<sup>th</sup> February, as resilient data and falling inflation boosted earnings. But global equities fell sharply after concerns over the health of the global banking system emerged early in March. The fall in the FTSE 100 was bigger than the drop in the US S&P 500. Indeed, at around 7,600 now, the FTSE is 5.2% below its record high on 20<sup>th</sup> February, while the S&P 500 is only 1.9% lower over the same period. That's despite UK banks having been less exposed and equity prices in the UK's financial sector not falling as far. It may be due to the smaller decline in UK interest rate expectations and bond yields, which raise the discounted value of future earnings, compared to the US.

**USA.** The flurry of comments from Fed officials over recent months suggest there is still an underlying hawkish theme to their outlook for interest rates. Markets are pricing in a further interest rate increases of 25-50bps, on top of the current interest rate range of 4.75% - 5%.

In addition, the Fed is expected to continue to run down its balance sheet once the on-going concerns about some elements of niche banking provision are in the rear-view mirror.

As for inflation, it is currently at c6% but with the economy expected to weaken during 2023, and wage data already falling back, there is the prospect that should the economy slide into a recession of any kind there will be scope for rates to be cut at the backend of 2023 or shortly after.

**EU.** Although the Euro-zone inflation rate has fallen below 7%, the ECB will still be mindful that it has further work to do to dampen inflation expectations and it seems destined to raise rates to 4% in order to do so. Like the UK, growth has remained more robust than anticipated but a recession in 2023 is still seen as likely by most commentators.

# Appendix 4: Approved Countries for Investments as at 31st March 2023

#### AAA

- Australia
- Denmark
- Germany
- Netherlands
- Norway
- Singapore
- Sweden
- Switzerland

#### AA+

- Canada
- Finland
- U.S.A.

#### AA

- Abu Dhabi (UAE)
- France

#### AA-

- Belgium
- Qatar
- U.K.





## Report of the Director West Yorkshire Pension Fund to the meeting of Governance and Audit Committee to be held on 15 June 2023

D

#### Subject:

Minutes of West Yorkshire Pension Fund (WYPF) Local Pension Board meetings held 21 March 2023.

#### **Summary statement:**

The role of the Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the LGPS.

City of Bradford Metropolitan District Council (the Council), as Scheme Manager, as defined under section 4 of the Public Service Pensions Act 2013, has delegated legal and strategic responsibility for West Yorkshire Pension Fund (WYPF) to the Governance and Audit Committee.

The minutes of the WYPF Pension Board meeting are to be submitted to this committee.

Euan Miller Managing Director Portfolio:

Leader of Council & Strategic Regeneration

**Overview & Scrutiny Area:** 

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#### 1. SUMMARY

➤ The Council's Financial Regulations require the minutes of meeting of WYPF Local Pension Board to be submitted to this committee.

#### 2. APPENDICES

- Appendix A Minutes of WYPF Local Pension Board meeting of 13 December 2022 (reconvened to 21 March 2023)
- Appendix B Minutes of WYPF Local Pension Board meeting of 21 March 2023.





# Minutes of a meeting of the reconvened West Yorkshire Pension Fund Pension Board of 13 December 2022 held on Tuesday, 21 March 2023 in WYPF, Aldermanbury House, Godwin Street, Bradford.

Commenced 10.30 am Concluded 10.55 am

#### **Present - Members**

Employer Representatives	Member Representatives
Councillor S Lal (Chair) – Bradford	Mr P Charlton – GMB
Councillor L Malkin - Wakefield	Mr M Binks – Unison
Ben Petty - Employer	Mr I Dziya – Unison
	Mr M Morris – Unite the Union

#### **Councillor Lal in the Chair**

#### 30. DISCLOSURES OF INTEREST

All those present who were members or beneficiaries of the West Yorkshire Pension Fund disclosed, in the interests of transparency, an interest in all relevant business under consideration.

**Action: Director of Legal and Governance** 

#### 31. MINUTES

#### Resolved -

That the minutes of the reconvened meeting of 13 September, held on 18 October 2022, be signed as a correct record.

#### 32. INSPECTION OF REPORTS AND BACKGROUND PAPERS

There were no appeals made to view restricted documents

#### 33. LOCAL GOVERNMENT PENSION SCHEME REGULATIONS UPDATE

The report of the Managing Director, West Yorkshire Pension Fund, (**Document** "**V**") updated Members on changes to the Local Government Pension Scheme (LGPS) 2014 and provided information on associated matters.

Members were advised that the report was being discussed at the meeting scheduled later in the day and it was agreed that a more up to date presentation be presented at that time.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 34. REGISTER OF BREACHES

The Managing Director, West Yorkshire Pension Fund, presented a report (**Document "W")** which informed Members that, in accordance with the Public Service Pensions Act 2013, from April 2015, all Public Service Pension Schemes came under the remit of the Pensions Regulator.

The report revealed that Section 70 of the Pensions Act 2004 (the Act) imposed a requirement to report a matter to The Pensions Regulator as soon as it was reasonably practicable where that person has reasonable cause to believe that:

- A legal duty relating to the administration of the scheme had not been or was not being complied with, and
- The failure to comply was likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

It was explained that a register of any breaches of the Pensions Code of Practice was maintained in accordance with the WYPF Breaches Procedure and a copy of the register 2022/23 was appended to Document "W".

As the matter was being discussed at the meeting scheduled later in the day it was agreed that a more current presentation be presented at that time.

#### Resolved -

That the entries and actions taken on the Register of Breaches of Law contained in the appendix to Document "W" be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 35. PENSIONS ADMINISTRATION

The report of the Managing Director, West Yorkshire Pension Fund (**Document "X**") provided an update on West Yorkshire Pension Fund's (WYPF) pensions administration activities for the period 1 July 2022 to 30 September 2022.

Members were reminded that in addition to providing pensions administration for WYPF scheme members, WYPF provides a full administration service to Lincolnshire Pension Fund, the London Boroughs of Hounslow and Barnet and to twenty-three Fire Authorities. This service includes pensioner payroll (except for the London Borough of Hounslow), all member and scheme level events,

reporting to statutory bodies, provision of data to external bodies and local authorities for the production of the scheme accounts.

The report of the Director, West Yorkshire Pension Fund (**Document "L"**) was submitted to the Pension Board to provide an update on the administration activities undertaken in the previous six months.

The report detailed performance against a number of key performance indicators (KPI's) and explanation was given for any underperformance. The report also provided an account of being undertaken which was categorised and revealed work in progress and work pending providing an account of the volume of work was and the nature tasks undertaken.

Information on praise and complaints revealed an overall customer training during the period of 93.2%. Full details of customer survey results were appended to the report.

Internal conflict resolution procedures during the period were reported and Members were reminded that WYPF operated a two-stage procedure for resolving issues of conflict with stage 1 managed by employer adjudicators or the Director of WYPF in cases involving the administering authority (Bradford). Stage 2 appeals were considered by the Chief Executive of Bradford City Council.

It was reported that Annual Benefit statements and Deferred Benefit statements were being issued electronically. Members were encouraged to register online but hard copies were still available if any Members preferred paper copies. The percentage of ABS/DBS statements issued on time stood in excess of 99%. Reasons for not achieving a 100% target of issue by 31 August were due to queries with employers and linkages.

Members were advised that the administration service had been subject to internal audit and had received an excellent rating with no recommendations for improvement.

Members queried that, as KPI's such as 100% of ABS statements by August would never be achieved due to people not informing the fund of changes to details such as house moves; were the KPI's unrealistic and questioned if they should be amended. In response it was explained that work was being undertaken to automate some process and the fund would always aim to address underperformance

It was questioned if staffing had impacted on the fund's performance and it was explained that the fund, like all other funds nationally, did have recruitment issues. Some recruitment processes had taken longer than the fund would have liked and additional training did hinder existing qualified staff. The level of vacancies was queried and it was explained that there were four vacancies arising from internal promotions on the administration team and recruitment would be made to the internal investment team shortly.

The motivation for a turned down appeal outlined in the Internal Disputes Resolution Performance was queried and it was explained that this was because that Member was over pensionable age and the fund had no discretion to pay that members transfer value because of their age.

Members expressed their thanks to officers for their hard work which was documented in the report.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 36. MONTHLY DATA POSTING - PHASE (MP Phase 3)

The report of the Managing Director, West Yorkshire Pension Fund (**Document** "Y") presented an overview of West Yorkshire Pension Fund Monthly Data Posting System and an update on the latest version of the system "MP Phase3".

The report revealed that WYPF introduced monthly data posting in April 2014, using a simple, yet comprehensive Microsoft Excel spreadsheet template. The WYPF template allowed employers to submit financial data for contribution and pension data together, this was rare in the sector as most pension funds collected admin data separately from financial data. WYPF offered a one-stop data collection each month which was unique at the time and the strategy was built around data needs of the career average scheme and has evolved since 2014. Two of the efficiency and effectiveness driving factors were to move data posting to pension member records and cash reconciliation from an annual, problematic, project based event to efficient, routine, business as usual monthly activities. WYPF had delivered these two points.

It was explained that the system developed internally by WYPF, built on basic Civica systems, had proven to be industry leading. WYPF had supported both Civica and the wider Local Government and Fire public pension sector to develop Monthly Data Posting. The system had been tweaked over the years and regularly updated. The latest version would bring in a number of change processes that would ensure the Monthly Data Posting system would be fit for purpose going forward and support data needed for pensions dashboard. The fund was also looking to review the data posting deadline of 10 days, downward to 8 days, depending on the efficiency of the new system.

Members were advised that it had been hoped to go live with the new system in January 2023, however, cyber testing was continuing and whilst that should be completed within the next two weeks the launch had been deferred to 19 May 2023 to allow Bradford Council contractors to deliver testing. The current performance for posting was 94.5% against a target of 95% which had been hampered by the testing and employer engagement.

Members questioned if the current system would be operating in parallel with the new version and it was confirmed that the current system would run in parallel and not be abandoned. Employers would be brought into the new interface in phases; comparisons would be made and when satisfied the fund would encourage employer to use the new process.

In response to questions it was confirmed that suggestions received from a pilot of the new interface had been taken forward. Recommendations to use the new process as a 'one stop process' had been considered but resolutions were still required for notification of hours. Work had been conducted on suggestions but not yet tested.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 37. McCLOUD - EFFECTS ON LOCAL GOVERNMENT

The report of the Managing Director, West Yorkshire Pension Fund (**Document Z**) was submitted to provide details of the work undertaken in anticipation of the regulations being made in light of the McCloud remedy. That followed the release, in July 2020 of the government's long awaited consultation on applying the remedy to address the age discrimination inherent in the transitional protections that were adopted by the public service scheme in 2014.

The report revealed response to the consultation was expected before the summer recess in July 2022, however, that was not received and it was expected it would be towards the end of the year with draft regulations issued shortly afterwards. Members were advised that the regulations would come into force on 1 October 2023 and whilst the preparation window was shortening the fund were poised for action.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 38. ACTUARIAL VALUATION 2022

The report of the Managing Director, West Yorkshire Pension Fund (**Document** "**AA**") provided an update of the work undertaken to date on the 2022 Actuarial Valuation and the next steps.

Members were advised that the report was being discussed at the meeting scheduled later in the day and it was agreed that a more up to date presentation be presented at that time.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 39. TRAINING REQUIREMENTS

The report of the Director, West Yorkshire Pension Fund, (**Document "AB"**) reminded Members that the role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

Members were aware that the training of Pension Board members to understand their responsibilities and the issues they would be dealing with was a very high priority. To be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members must be able to demonstrate suitable knowledge and skills relating to the LGPS to effectively scrutinise the decisions made by officers.

Details of training courses, conferences and seminars were contained in Document "AB" to assist Board Members.

Members were advised that the report was being discussed at the meeting scheduled later in the day and it was agreed that a more up to date presentation be presented at that time.

#### NO RESOLUTION WAS PASSED ON THIS ITEM

Chair

Note: These minutes are subject to approval as a correct record at the next meeting of the West Yorkshire Pension Fund Pension Board.

THESE MINUTES HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER



# Minutes of a meeting of the West Yorkshire Pension Fund Pension Board held on Tuesday, 21 March 2023 at 11.00 am in Aldermanbury House, Godwin Street, Bradford

Commenced 11.00 am Concluded 1.00 pm

#### **Present - Members**

Employer Representatives	Member Representatives
Councillor S Lal (Chair) – Bradford	Mr P Charlton – GMB
Councillor L Malkin - Wakefield	Mr M Binks – Unison
Ben Petty - Employer	Mr I Dziya – Unison
	Mr M Morris – Unite the Union

#### **Councillor Lal in the Chair**

#### 40. DISCLOSURES OF INTEREST

All those present who were members or beneficiaries of the West Yorkshire Pension Fund disclosed, in the interests of transparency, an interest in all relevant business under consideration.

**Action: Director of Legal and Governance** 

#### 41. INSPECTION OF REPORTS AND BACKGROUND PAPERS

There were no appeals made to view restricted documents.

# 42. DRAFT MINUTES OF THE WEST YORKSHIRE PENSION FUND (WYPF) JOINT ADVISORY GROUP HELD ON 26 JANUARY 2023

Members were aware that the Council's Financial Regulations required the minutes of meeting of the WYPF Joint Advisory Group (JAG) to be submitted to this committee.

The report of the Managing Director, West Yorkshire Pension Fund, (**Document** "AC") presented the draft minutes of the JAG meeting held on 26 January 2023 to enable the Board to ensure effective and efficient governance and administration of the LGPS.

The Managing Director, WYPF, provided an update on issues discussed at the JAG meeting which were not being considered later in the meeting.

The minutes revealed that the proposed budget for 2023/24 was approved and that the fund was expected to be the lowest cost LGPS fund.

The Funding Strategy Statement had been noted and was to be reported to the Governance and Audit Committee on 23 March 223 with a recommendation for approval. Members of the JAG had requested that the fund divested in investments in fossil fuels. As it had not been appropriate to amend the statement at the meeting, as the consultation period had ended, the comments made had been noted.

In response to questions Members were advised that the JAG had been involved in the consultation process on the Funding Strategy Statement (FSS) at the appropriate time. The FSS had also been discussed at the Investment Advisory Panel prior to the JAG meeting and no issues had been raised.

The amount of funds invested in fossil fuels were queried and, whilst it was difficult to report an exact amount at the meeting an indication of those investments was provided. It was explained that the fund did have substantial holdings in green energy and was a partner in GLIL which offered investors exposure to assets in a range of sectors covering greenfield sites.

It was explained that the Strategic Assets Strategy would be reviewed over the summer months and presented to the Investment Advisory Panel in July. Following Member questions, it was confirmed that Members would be consulted on the revised investment strategy and would have the opportunity to provide feedback at that time.

The CEM Pensions Administration Benchmarking Survey (PABS) was discussed and it was reported that WYPF compared favourably with other large funds.

It was confirmed that all funds were required to have an Additional Voluntary Contributions scheme and that the scheme was reviewed annually. JAG had considered a request to replace WYPF's bespoke Lifestyle Strategy with its Adventurous Pension Approach Strategy Targeting Lump Sum. The request was made to better represent what members did on retirement.

A Member questioned if previous issues with an AVC provider had been rectified and it was explained that the issues had been resolved and regular meetings were held with that company.

A deterioration in performance from another provider was discussed which had been due to the introduction of a new IT system. Members were assured that business was now back to normal.

A Member reported he had had been unaware of the change of business name of Equitable Life to Utmost Life and Pensions and was concerned that if others were unaware there may be payment delays. It was reported that the name change had occurred in 2020 and the Fund were unaware of any issues that may have been caused.

#### Resolved -

That the minutes of the WYPF Joint Advisory Group held on 26 January 2023 be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 43. REGISTER OF BREACHES

The Managing Director, West Yorkshire Pension Fund, presented a report (**Document "AD")** which informed Members that, in accordance with the Public Service Pensions Act 2013, from April 2015, all Public Service Pension Schemes were under the remit of the Pensions Regulator.

Section 70 of the Pensions Act 2004 (the Act) imposed a requirement to report a matter to The Pensions Regulator as soon as it was reasonably practicable where that person had reasonable cause to believe that:

- A legal duty relating to the administration of the scheme had not been or was not being complied with, and
- The failure to comply was likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

A register of any breaches of the Pensions Code of Practice was maintained in accordance with the WYPF Breaches Procedure. The Register of Breaches 2022/23 was appended to Document "AD".

Problems experienced with Enviroserve were explained as confusion had arisen when that employer had joined the fund. All employee contributions had been received by the fund on 15 February 2023 and outstanding employer contributions were to be paid in monthly instalments.

An issue with a staff absence by the member of staff responsible for payments at Ryhill Parish Council and which affected other parish or town councils would be resolved shortly as alternative staffing arrangements had been made.

Members were advised that the reporting procedure at the Fund had been enhanced and the register now contained more entries. This was not a matter for concern but just an increase in efficiency providing a more robust reporting system. Members were assured that officers worked with employers to obtain all outstanding payments.

In response to questions it was confirmed that late or non-payment of employer contributions would not impact on benefits paid.

It was confirmed that none of the entries on the register had been thought to be of material significance and had not been reported to The Pension Regulator (TPR). It was queried when that would occur and Members were advised that a judgement was made by the Fund. If employers were engaging with the Fund and the reasons for non-payment, such as staff absence or a change in operating

systems were understood, most payments would be received within weeks and reporting to the TPR was not deemed necessary.

If an employer failed to engage with the Fund their financial status would be monitored and all leverage would be used to ensure contributions were received.

It was questioned if non-payment by Enviroserve was a significant issue. It was explained that they were a big payroll provider and officers had monitored to identify trends which had not been found. There had been some admission contractual issues resulting in missed payments. The situation could not be pursued until the admission issue had been resolved. As of last week significant payments had been received for member contributions although employer payments were still outstanding. The situation would be monitored and it was hoped would be resolved in the next report.

In response to questions it was confirmed that administration fees were imposed on employers who failed to pay or provide data by the due date. Those charge were usually applied when the funds were not received one month after the due date. Often the threat of those charges was enough to rectify the issue.

Members questioned the amounts of charges imposed and it was agreed to provide that information at a future meeting.

It was confirmed that late or failed payments did not have a detrimental impact on the fund and it was reiterated that the Fund worked closely with employers and provided support.

#### Resolved -

That the entries and actions taken on the Register of Breaches of Law contained in the appendix to Document "AD" be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 44. LOCAL GOVERNMENT PENSION SCHEME UPDATE

The report of the Managing Director, West Yorkshire Pension Fund (**Document** "**AE**") provided an update on changes to the Local Government Pension Scheme (LGPS) 2014 and provided information on associated matters.

As an update since the production of the report Members were advised that the Fund were still waiting for draft regulations on the McCloud remedy.

The report revealed that the Fire Brigades Union and the British Medical Association had been given permission to judicially review the Government's decision to include the McCloud remedy costs in the 2016 cost control valuations. Members questioned the percentage of the cost management fee and requested that the judgement be shared with them.

In response it was confirmed that local government unions had not been involved in the judicial review. It was agreed to send Members a link to that judgement.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 45. COMMUNICATIONS POLICY AND PENSION ADMINISTRATION STRATEGY

The Managing Director, West Yorkshire Pension Fund, presented **Document** "**AF**" which explained that, in compliance with the LGPS Regulations 2013, WYPF prepared a written statement of the authority's policies in relation to such matters as it considered appropriate in relation to procedures for liaison and communication with scheme employers and the levels of performance which the employers and WYPF were expected to achieve.

Members were advised that the Pensions Administration Strategy had not required any update. The Communications Policy had been updated to reflect actions, including on line activities, planned for 2023.

It was explained that members were encouraged to sign up to the online portal which the Fund wished to develop into the normal method of communication. Telephone and written communications would remain for those that wished. The online portal enabled members to produce their own pensions forecast.

It was confirmed that the Pensions Administration Strategy and Communications Policy were approved by JAG at their last meeting in January 2023.

#### Resolved -

That the Pension Administration Strategy and the Communications Policy 2023 be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 46. PENSION ADMINISTRATION REPORT

The Managing Director, West Yorkshire Pension Fund, presented a report (**Document "AG"**) which provided an update on West Yorkshire Pension Fund's (WYPF) pensions administration activities for the period 1 October 2022 to 31 December 2022.

The report included performance and benchmarking statistics and reported the rationale for any targets not met.

The volume of work in progress was reported together with current scheme information including membership numbers.

Praise and complaints were reported and included details of, and a summary of responses to, surveys undertaken with all members who had received a service

from the fund.

Internal dispute resolution was reported and it was confirmed that there had been no increases in that area.

The report revealed recruitment being undertaken and included the appointment of a Member Service Manager post as the previous post holder had been promoted internally. A Senior Pensions Officer had also been promoted and appointment to that post would be required. The Universal Pension's Management team were also being enhanced to carry out the automation project. Current staffing levels were reported.

Members were advised that the Fund had won the Good Governance Award at the LAPF Investment Awards in December 2022. The Fund had also been shortlisted for DB Pension Scheme of the Year; Pension Scheme Communication Award and Pensions Administration Award. The winners of those categories would be announced at a meeting in London later in the day.

A Member questioned, within the KPI indicators, why requests for pension estimates for 'those with future dates' had not been accurately reported. It was explained that requests were regularly received from members who would retire well into the future. The priority was to provide estimates for members who were closer to retirement and that was why more accurate figures could be provided for those members. The online portal also allowed members to produce their own pension forecast and should ease the volume of speculative requests received. The online facility would have a bigger launch soon.

It was suggested that KPI's be split into categories reflecting the volume of work required for those approaching retirement. It was agreed that could be considered as could the impact of members calculating their own forecasts.

The report revealed that the Fund continued to chase employers who did not hold a discretions policy and whilst policies were being received there were still 300 outstanding. A Member suggested that the discretions policy be placed on the Register of Breaches.

It was explained that the Employer Relations Team had been working with a number of employers to obtain those policies. It was believed that some employers may have the policies but had not provided them, as was required, to the Fund. It was agreed that an entry on the breaches register would be an additional way to monitor that policy.

A Member questioned the use of acronyms within the report and was advised that UPM stood for Universal Pensions Management.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 47. RISK MANAGEMENT

The report of the Managing Director, West Yorkshire Pension Board (**Document** "AH") presented West Yorkshire Pension Fund's Risk Policy and Strategy.

Members were advised that the purpose of the policy and strategy was to effectively mitigate risks which may otherwise impact on WYPF meeting its statutory responsibilities and strategic objectives. This was achieved by the development and maintenance of a comprehensive risk register. For each risk identified its likelihood of occurrence and materiality was considered and actions were identified in order to mitigate the risk.

It was confirmed that the Risk Policy and Strategy was subject to regular review by the WYPF Investment Advisory Panel (IAP) and Joint Advisory Group (JAG).

It was revealed that a major IT outage had been encountered recently and, in response to questions, assurances were provided that it had not been a cyberattack and was a hardware failure. The report revealed that IT services to the Fund were provided by Bradford Council and that regular discussions were held with the head of IT service. The Council recognised that the Pension Fund was a key department and resilience was built into the system to cater for that Fund

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 48. ACTUARIAL VALUATION 2022

The Managing Director, West Yorkshire Pension Fund presented (**Document** "Al") which reported that the triennial actuarial valuation of the West Yorkshire Pension Fund (WYPF) was being prepared based on the position at 31 March 2022, and would determine the level of employers' contributions for the period 1 April 2023 to 31 March 2026.

It was reported that, subject to the draft Funding Strategy Statement being approved, the indications were that WYPF would be 108.5% funded, compared to the situation at 31 March 2019 when it was 106% funded.

As a result, each of the five district councils would see a slight reduction in their employer contributions. The principal reasons that had improved the funding position since 2019 were reported and it was confirmed that employers had been notified of contribution rates.

The summary of assumptions contained in the report was discussed. It was questioned if the assumption of 2.3% CPI pension increase would impact on the valuation ratio in future years. In response it was explained that loading had been included in the valuation as it was known that inflation would not be maintained at 2.3%.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 49. FUNDING STRATEGY STATEMENT

The report of the Managing Director, West Yorkshire Pension Fund, (**Document** "AJ") reported that WYPF must maintain a Funding Strategy Statement (FSS) in accordance with the Local Government Pension Scheme Regulations 2013. It must keep the statement under review and, after consultation with such persons as it considered appropriate, must make such revisions as are appropriate following a material change in its policy

The Administering Authority undertook a consultation exercise with all stakeholders on updates to the Funding Strategy Statement which reflected the principles and approaches it intended to take as part of the 2022 valuation exercise. It was confirmed that the Funding Strategy Statement was being considered by the Governance and Audit Committee on 23 March 2023 with a recommendation for approval.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 50. PENSIONS DASHBOARD

The report of The Director, West Yorkshire Pension Fund (**Document "AK"**) was presented to provide an update on the progress of the introduction of the Pensions Dashboard. Members were advised that this was a Government initiative designed to get people to engage with their pensions savings and prepare for retirement.

The work required in preparation for the Pensions Dashboard was set out in the report and whilst this could generate a lot of work for the Fund it was hoped that this would provide an enhanced service to Members.

Members were advised that work was continuing and officers were confident that the Fund were prepared.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 51. LGPS ONLINE LEARNING ACADEMY AND TRAINING UPDATES

Members were aware that there was a growing need for LGPS funds to demonstrate that pension committees and local pension board members ('Members') had an adequate level of knowledge to carry out their roles effectively. With the introduction of a refreshed CIPFA Knowledge & Skills Framework, the Scheme Advisory Board's Good Governance project (England and Wales), and increasing scrutiny from The Pensions Regulator (TPR), the expectation on funds had never been greater.

The Managing Director, West Yorkshire Pension Fund, provided a report, (**Document "AL")** which detailed training and conferences to assist Members in meeting their training requirements.

Members of the Joint Advisory Group, Investment Advisory Panel and Local Pensions Board recently completed Hymans Robertson's LGPS National Knowledge Assessment (NKA), which were designed to highlight potential gaps in Members' knowledge and help LGPS funds construct effective training plans. WYPF's NKA report was attached as Appendix A to Document AL.

A Member raised issues he had encountered when trying to enrol on The Pension Regulator training toolkit. He was advised of a work around to that problem and details of that solution would be sent to Members.

Concern was expressed about the inability to rewind videos on the Hymans Robertson's training. It was explained that the issue had been reported to the Hymans Robertson's team. There would be a full relaunch of the training shortly and Members currently undertaking that training were advised to stop and wait for the full relaunch.

At the conclusion of discussions on training Members were provided with a detailed PowerPoint presentation relating to the 'CARE' revaluation training. A copy of that presentation were available from the WYPF's Governance and Business Director, Matthew Mott.

#### Resolved -

- 1. That the TPR Toolkit online training and the Hymans Robertson online Learning Academy training be undertaken to allow Members to meet the requirements defined by the Public Service Pensions Act 2013.
- 2. That consideration would be given to attending external training events and conferences provided by PLSA, LGA and actuaries and other specialist organisations.

**Action: Managing Director, West Yorkshire Pension Fund** 

#### 52. CYBER SECURITY

The report of the Managing Director, West Yorkshire Pension Board (**Document** "**AM**") informed Members of the significant damage to organisations that store financial information and personal identifiable information about individuals from cyber-attacks and of measures taken by the fund to become cyber ready to prevent, contain and respond to evolving threats in the digital environment.

Members questioned if working from home had increased the likelihood of cyberattacks and were informed that strict policies and guidelines were in place. Officers were not able to add hard drives or USB's to laptops and all data was kept securely on the network.

Members were advised that they would receive Cyber training shortly.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 53. GOVERNANCE REVIEW

The report of the Managing Director, West Yorkshire Pension Fund, **(Document "AN")** set out at a high level, a proposed process for undertaking a WYPF governance review and initial feedback was sought from Pension Board Members.

It was reported that a similar report had recently been presented to JAG and IAP and would be discussed at the forthcoming meeting of the Bradford Council Governance & Audit Committee.

Members were informed that following the appointment of a new Managing Director and Chief Investment Officer it had been considered a good time to conduct the review. It was also confirmed that the Chief Executive of Bradford Council was supportive.

It was reported that, in addition, the Government and the Scheme Advisory Board (SAB) were expected to implement in the near future the recommendations of the SAB's Good Governance Project, providing further clarity on the requirements and best practice expected of LGPS administering authorities.

The WYPF review would consider the scheme of delegation from Bradford Council and how investment decisions were made. It was proposed to procure professional support to conduct the review.

A Member raised concern about the cost of procuring professional support prior to the outcome of the SAB review. In response it was confirmed that the outcomes of that review were known but statutory guidance had not yet released.

The exact costs of consultancy support were not yet known but it was felt that, for a fund the size of WYPF, value for money would be provided by seeking

professional expertise, drawing on best practice from other LGPS administering authorities and the wider pensions and investment community. Potential conflicts of interest would also be minimised with the use of external providers.

#### Resolved -

That the report be noted.

Action: Managing Director, West Yorkshire Pension Fund

#### 54. EXCLUSION OF THE PUBLIC

#### Resolved -

That the public be excluded from the meeting during consideration of the Not for Publication Appendix to Document "AO" relating to the minutes of a West Yorkshire Pension Fund Investment Advisory Panel meeting held on 27 October 2022 and 26 January 2023 because information would be disclosed which is considered to be exempt information within paragraph 3 (Financial or Business Affairs) of Schedule 12A of the Local Government Act 1972 (as amended).

It is considered that, in all the circumstances, the public interest in maintaining this exemption outweighs the public interest in disclosing this information as it is in the overriding interest of proper administration that Members are made aware of the financial implications of any decision without prejudicing the financial position of the West Yorkshire Pension Fund.

# 55. MINUTES OF THE WEST YORKSHIRE PENSION FUND (WYPF) INVESTMENT ADVISORY PANEL HELD ON 27 OCTOBER 2022 AND 26 JANUARY 2023

The report of the Director, West Yorkshire Pension Fund (Document "AO") containing Not for Publication appendices 1 & 2 was submitted to the Board and reminded Members that the role of the Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 was to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

The Minutes of meeting of WYPF Investment Advisory Panel were submitted to the Pension Board to enable the Board to ensure effective and efficient governance and administration of the LGPS.

#### Resolved -

That the Not for Publication minutes/notes of the WYPF IAP meetings held on 27 October 2022 and 26 January 2023, appended to Document "AO" be noted.



Chair

Note: These minutes are subject to approval as a correct record at the next meeting of the West Yorkshire Pension Fund Pension Board.

THIS AGENDA AND ACCOMPANYING DOCUMENTS HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER



# Report of the Director of Finance and IT to the meeting of the Governance and Audit Committee to be held on 15 June 2023.

E

Subject:

**INTERNAL AUDIT PLAN 2023/24** 

#### **Summary statement:**

This report outlines the Internal Audit Plan for the financial year 2023/24. The delivery of the audit plan will assist with risks within the systems reviewed being managed to an acceptable level through improvement in internal control.

In addition to the 2023/24 Internal Audit year plan the report identifies an indicative plan for a further two years to highlight the risks that are being monitored

#### **Equality & Diversity:**

The achievement of the 2023/24 Internal Audit Plan will provide assurance that the appropriate governance processes are in place which allows Service Objectives to be delivered in accordance with the Council's equality policies.

Christopher Kinsella
Director of Finance and IT

Report Contact: Mark St Romaine

Phone: (01274) 432888

E-mail:

mark.stromaine@bradford.gov.uk

Portfolio:

Corporate Improvement Area:

Corporate

#### 1. SUMMARY

- 1.1 The purpose of this report is to inform the Governance and Audit Committee of the Internal Audit Plan for the financial year 2023/24, giving the Committee the opportunity to contribute to the plan. It demonstrates where Internal Audit adds value to the Council by providing independent and objective assurance of risks to internal control within the Council's systems and processes. The Audit Plan reflects internal stakeholders' needs and the expected needs of the Council's external auditors for 2023/24.
- 1.2 The delivery of the audit plan will assist with risks within the systems reviewed being managed to an acceptable level through improvement in internal control.

In addition to the 2023/24 Internal Audit Year Plan the report identifies an indicative plan for a further two years to highlight the risks that are being monitored

#### 2. BACKGROUND

#### Internal Audit Plan 2023/24

- 2.1 The Council's Constitution gives the Governance and Audit Committee the responsibility of approving the Internal Audit Plan.
- 2.2 The Internal Audit Plan details the work planned for the 2023/24 financial year. The plan demonstrates that Internal Audit's resources are managed effectively and that the coverage is appropriate to allow the Head of Internal Audit, Insurance and Risk to gain sufficient evidence to be able to form an opinion on the internal control systems of the Council that it has reviewed. The opinion must be based on a balance of work so that the internal control environment, the risk management and governance arrangements of the authority can be assessed.
- 2.3 The plan has included contributions from departmental management teams and has also been subject to consultation with Council Management Team. It is the case that there will always be a shortfall of resources against the planned work required. Consequently, it is expected that not all planned audits in the plan are deliverable and the Service will have to prioritise the use of its resources.
- 2.4 Performance will be reported to the Governance and Audit Committee in the Internal Audit Half Year Monitoring statement in November 2023 and in the Annual Audit Report in June/July 2024.
- 2.5 The 2023/24 audit plan will enable the Head of Internal Audit, Insurance and Risk to form an opinion at the end of the year on the Council's control, risk and governance arrangements. The 2023/24 audit plan has been developed to show clearly how the work planned will contribute to forming audit conclusions on control, risk and governance that will feed into the year end opinion.
- 2.6 There are two areas where the contents of the Internal Audit Plan have yet to be finalised. The first relates to Bradford's Children and Families Trust where discussions are ongoing on what financial systems and procedures should be prioritised. At the moment sixty days of Internal Audit resource has been allocated to work on behalf of the Trust. The other area to be finalised is the Computer Audit function. The first four year plan of the computer audit contract by Salford Internal Audit Services is coming to a close. It is the intention to enter into a further three contract for the Council's Computer Audit Service with Salford Council.

The contract will be agreed in early summer and will be for approximately sixty days support per annum.

2.7 The Public Sector Internal Audit Standards External Assessment is currently being completed by CIPFA. Any agreed recommendations from the assessment will be included in the Internal Audit Services Quality Assurance Improvement Plan for 2023/24.

#### 3. OVERVIEW AND SCRUTINY COMMITTEE CONSIDERATION

3.1 Not Applicable.

#### 4. OTHER CONSIDERATIONS

4.1 There are no other considerations.

#### 5. **OPTIONS**

5.1 Not applicable.

#### 6. FINANCIAL AND RESOURCE APPRAISAL

6.1 There are no direct financial consequences arising from this report. The work of Internal Audit adds value to the Council by providing management with an assessment on the effectiveness of internal control systems, making, where appropriate, recommendations that if implemented will reduce risk.

#### 7. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 7.1 The work undertaken within Internal Audit is primarily concerned with examining risks within various systems of the Council and making recommendations to mitigate those risks. The key risks examined in internal audits are discussed with management at the start of the audit and the action required from internal audit recommendations is verified as implemented by Strategic Directors.
- 7.2 The fundamental shifts in the way the Council now works has significantly increased the risks facing the Council across its service delivery functions and its community responsibilities across the District. Internal Audit will be reviewing these risks in accordance with the plan. From a governance perspective there is the risk that internal controls may not operate normally with the same degree of management oversight and Council scrutiny. It is essential that management maintain appropriate controls in place to ensure value for money is achieved and the financial resilience of the authority continues. Internal Audit will be making an ongoing assessment of the control environment and where required completing specific work to rectify any identified control weaknesses.

#### 8. **LEGAL APPRAISAL**

8.1 The Accounts and Audit Regulations 2015 requires the Council to undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards and guidance. The Council achieves this by complying with the Public Sector Internal Audit Standards (PSIAS), which it does by following the CIPFA Local Government Application Note. The Internal Audit Plan needs to be approved by the Governance and Audit Committee to ensure compliance with the PSIAS.

#### 9. OTHER IMPLICATIONS

#### 9.1 Equality and Diversity

The Internal Audit Plan seeks assurance that the Council fulfils its responsibilities in accordance with its statutory responsibilities and its own internal guidelines. When carrying out its work Internal Audit will review the delivery of service to ensure it is in accordance with the formal decision making process of the Council.

#### 9.2 Sustainability implications

When reviewing Council Business Internal Audit will be examining the sustainability of the activity and to ensure that mechanisms are in place so that services are provided within the resources available.

#### 9.3 Greenhouse Gas Emissions Impacts

There are no direct impacts on Gas Emissions.

#### 9.4 Community safety implications

There are no direct community safety implications.

#### 9.5 **Human Rights Act**

There are no direct Human Rights Act implications.

#### 9.6 Trade Union

There are no implications for the Trade Unions arising from the report.

#### 9.7 Ward Implications

Internal Audit will undertake specific audits through the year which will ensure that the decisions of council are properly carried out.

#### 9.8 Implications for Corporate Parenting

None

#### 9.9 Issues Arising from Privacy Impact Assessment

None

#### 10. NOT FOR PUBLICATION DOCUMENTS

10.1 None

#### 11. **RECOMMENDATIONS**

11.1 That the Committee reviews and approves the Internal Audit Plan for 2023/24.

#### 12. **APPENDICES**

12.1 Appendix 1 – Internal Audit Plan 2023/24.

#### 13. BACKGROUND DOCUMENTS

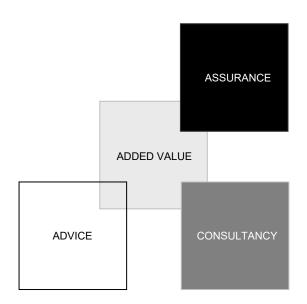
- 13.1 Accounts and Audit Regulations 2015.
- 13.2 Public Sector Internal Audit Standards 2017.
- 13.3 The CIPFA Local Government Application Note for the United Kingdom Public Sector Internal Audit Standards 2019 Edition.

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# **Internal Audit**



# **INTERNAL AUDIT PLAN 2023/24**



**DEPARTMENT OF CORPORATE RESOURCES** 

#### INTRODUCTION

One of the requirements of the "Public Sector Internal Audit Standards (PSIAS) and the CIPFA Local Government Application Note" is that an Annual Internal Audit Plan is produced and approved by the Governance and Audit Committee (GAC). Compliance with the PSIAS and the Local Government Application Note is a requirement of the Accounts & Audit Regulations 2015.

The plan has been developed in consultation with Christopher Kinsella, the Director of Finance and IT and the Strategic Directors for each Department. In order to prevent duplication of work and to ensure that the required audit assurances on the Council's financial systems are provided, the 2023/24 plan will be shared, as is normal practice, with the Council's external auditors. Internal Audit is committed to maintaining a strong working relationship with External Audit co-planning the internal and external audit programmes as required. Meetings will be held with the External Auditors throughout the year in order to share mutually beneficial information relating to risks and controls.

This Internal Audit Plan details the work planned for the financial year 2023/24 and identifies an indicative plan for a further two years.

## Mark St Romaine

Head of Internal Audit, Insurance and Risk

June 2023

#### Circulation:

Governance and Audit Committee Members Christopher Kinsella Director of Finance and IT Cameron Waddell

Director and Engagement Lead, Mazars

All Staff Internal Audit

#### 1. KEY AIMS

- 1.1 Internal Audit's role is to independently review, evaluate and report upon the internal control procedures that management have established, both in financial and non-financial systems and make appropriate recommendations whenever controls are found to be missing, excessive or not operating effectively.
- 1.2 Internal Audit will assess and make appropriate recommendations to improve the organisation's governance processes for:
  - making strategic and operational decisions
  - overseeing risk management and control
  - promoting appropriate ethics and values within the organisation
  - ensuring effective organisational performance management and accountability
  - communicating risk and control information to appropriate areas of the organisation, and
  - coordinating the activities of and communicating information among CMT, Governance and Audit Committee, external and internal auditors, other assurance providers and management
- 1.3 Internal audit activity will evaluate risk exposures and the effectiveness of control relating to the organisation's governance, operations and information systems regarding the:
  - achievement of the organisation's strategic objectives
  - reliability and integrity of financial and operational information
  - effectiveness and efficiency of operations and programmes
  - safeguarding of assets, and
  - compliance with laws, regulations, policies, procedures and contracts
  - occurrence and management of fraud risk
- 1.4 Overall Internal Audit undertakes the following functions:
  - a) The continuous, systematic and structured review of the soundness, adequacy and application of the Council's internal control systems in accordance with the audit plan.
  - b) Receiving notifications of all suspected or known losses or irregularities concerning cash, property, stores or other financial matters.
  - c) Undertaking management reviews and reporting the findings to management for them to take the appropriate course of action.
  - d) Reviewing and advising upon developing systems.
  - e) Providing advice on financial systems, procedures, regulations, corporate governance issues and risk management.
  - f) Contributing to the Council's objectives and best value whenever possible

#### 2. RESOURCES AVAILABLE

2.1 The total net resources available to Internal Audit are 2184 person days (8.4 FTE) which is less than the 2415 person days (9.3 FTE) available in 2022/23. The net decrease is due to one Audit Manager leaving during 2022/23 and not being replaced, and a long term sickness absence. A rearrangement of management responsibilities is currently being progressed. In March 2023 the Graduate Trainee Auditor was appointed to the post of Senior Auditor. A new Graduate Trainee Auditor had also been appointed in December 2022. Another Senior

Auditor has increased their working hours. Overall these resources will enable the Internal Audit Opinion to be supported by sufficient evidence.

#### 3. INTERNAL AUDIT PLAN SUMMARY

- 3.1 The summary of the Internal Audit Plan for 2023/24 in person days, by type of audit activity, is shown in Appendix A. Once the delivery of the Bradford Children and Families Trust has been factored in, the allocation of resources to the different audit activity is very similar to 2022/23. However there is increased resource assigned to the Council's Strategic Risks and a smaller resource for the certification of grants. Whilst there are no major changes from 2022/23, the plan reflects the objective of increasing focus on fundamental and significant systems, which was also where the service wanted to focus in 2022/23. Whilst the planning totals have not changed if the service can achieve these totals in 2023/24 this will demonstrate actual increased assurance in these areas.
- 3.2 During the year progress against the audit plan will be regularly monitored to ensure that audit resources are efficiently and effectively deployed. The performance will be reported to the Governance and Audit Committee in the Internal Audit Half Year Monitoring statement in November 2023 and in the Annual Audit Report in June/July 2024. These reports will also be presented to Council Management Team.

The majority of assignments will be completed during the year but as is normal working practice, some will inevitably be finalised in the following financial year.

The annual plan may change during the year, subject to capacity constraints, to reflect any significant events or new risks that occur through the year.

#### 4. INTERNAL AUDIT PLANNED WORK

4.1 This year's plan has incorporated significant levels of consultation with service departments to incorporate their key areas of risk. The risk assessment also takes into account a wide number of factors such as financial value, whether the systems operating have changed, Corporate Governance requirements, Corporate and Directors' priorities, prior audit assurance and known areas of concern. This year there was a significant review of the plan to remove obsolete areas of activity.

The Internal Audit Plan has been designed so that the Head of Internal Audit can provide an opinion which assesses the internal control environment, the risk management and governance arrangements of the authority. The Plan has been subject to consultation with the Council Management Team.

4.2 The plan consists of a one year plan for 2023/24 and an indicative plan for 2024/25 and 2025/26. There are two areas where the contents of the Internal Audit Plan have yet to be finalised. The first relates to Bradford Children and Families Trust where discussions are ongoing on what financial systems and procedures should be prioritised. At the moment sixty days of internal audit resource has been allocated to work on behalf of the Trust. The other area to be finalised is the Computer Audit function.

#### 5. BREAK DOWN OF AUDIT ACTIVITY

The following sections provide the detailed breakdown of the major productive areas covered in the Internal Audit Plan, by audit activity type, together with an indication of some of the key considerations in each area.

#### 5.1 Internal Audit Work 2022/23 Carried Forward

In any year there will be work carried forward from the previous year that was not completed in the year it was originally planned. Whilst there are a number of small carry forwards on several audits the following audits are now required to be substantially completed in 2023/24 rather than last financial year. These are tabled below.

#### 2022/23 Slippage into 2023/24

Audit	Days
Cash and Banking Project	15
Council Tax - Valuation & Billing incl reliefs & discounts	15
Waste Management	20

#### 5.2 Council Strategic Risk Register

PSIAS require Internal Audit to take a broader view on the Council's business risks and objectives. In order to facilitate this, Internal Audit will review the control environment supporting the Council's Strategic Risks. The Strategic Risks identified for review in 2023/24 are those that are topical and in some cases where they are assessed as red in respect of impact and likelihood. These are Critical Facilities, Inadequate Housing Supply, Supply Chain Risk and Human Capital Diversity and Talent Management.

The three year plan is detailed in Appendix B. It should be noted that not all strategic risks have been assigned a year for review which highlights that the risks to be reviewed can be flexible to focus on key areas of assurance.

#### 5.3 Fundamental Financial Systems

The work undertaken by Internal Audit helps the Director of Finance and IT and External Audit to fulfil their statutory responsibilities. Fundamental financial systems are those systems that have a material impact on the Council's accounts, for example Council Tax.

Appendix A shows that a total of 277 days has been allocated to fundamental financial systems work for 2023/24 which is a similar allocation to the previous two years. The approach to auditing fundamental financial systems centres on in depth auditing, on a three year cycle, of the controls operating within an element of the fundamental financial systems. These areas are generally well controlled but are essential for the financial management of the Council. Details of the fundamental financial systems and their cyclical coverage are shown in Appendix C.

#### 5.4 Significant Systems

The audit risk assessment identifies all the significant audit risks. The work on significant systems of the Council are operational within Services, such as, Energy Management, School Catering, Deferred Payment for Care, Waste Management and Conflicts of Interest. Significant systems represent the largest area of audit activity due to their number, complexity and diversity. On a three year cycle, Internal Audit aims to cover all of the Council's significant systems. This year the areas of coverage has been determined after a full consultation process with Service Departments.

Appendix A shows that 456 days has been allocated to significant systems work for 2023/24, which is a decrease on 2022/23, though 60 days have been reallocated to the Bradford

Children and Families Trust. Appendix D shows the full three year plan.

#### 5.5 School Audits

Schools operate under delegated financial and governance arrangements and have responsibility for significant resources. The audit plan each year includes time for the review of the systems within schools, and supporting schools.

For 2022/23, the remote audit approach developed and introduced during the Covid pandemic remained in operation and it has been possible on occasion to re-commence actually visiting some school premises. The approach, which focuses on three financially significant areas; Governance and Accountability, Purchasing and Payments, and Payroll, will continue to be followed in 2023/24, being reviewed and revised as circumstances and practices allow. 15 schools are planned to be selected for audit activity this financial year.

The position regarding academy conversions will continue to be monitored throughout 2023/24 to ensure audit resources are focussed appropriately in the context of this changing landscape.

In addition to school audits, there is an allocation of time relating to confirming compliance with the Schools Financial Value Standard, (SFVS), an Education & Skills Funding Agency initiative, (sitting within the DfE), currently consisting of 30 questions which school Governing Bodies must discuss annually with their Heads and Senior Staff, to give them assurance that they have secure financial management in place. All maintained schools, except those that meet certain exception criteria, are required to complete an annual SFVS assessment and return it to the Council; for 2022/23 returns it is the 31<sup>st</sup> March 2023.

The SFVS scheme also places a requirement on the Council's Director of Finance & IT, as S151 officer, to have in place a system of audit for schools which gives adequate assurance over standards of financial management and to consider SFVS returns received when setting the audit plan for schools. The numbers of returns received by the Council by the March deadline also informs an annual position statement declared by the Director of Finance & IT to the DfE, which for 2022/23 is the 31st May 2023.

There is an allocation of time within the plan for analysis of the assessments received in order to inform this year's school audit plan and also to provide additional financial management assurance.

Completion of the SFVS is the responsibility of individual schools, however there is an allocation of time within the audit plan to provide schools with training support on the consideration and completion of their SFVS assessments. This has historically proved to be an effective use of audit resources as good practice on financial management principles can be disseminated to many schools during one training session. In January 2023, training sessions were delivered by Internal Audit, in person on Council premises and on line using Microsoft Teams. This training is in addition to traditional remote methods of support on an individual school basis. Positive feedback has been received from delegates on training delivered to date and it is planned to deliver further training during 2023/24, in person and online.

Appendix A shows that the number of resources allocated to schools work for 2023/24 is 210 days, compared with the 255 days allocated for schools' audit work in 2022/23.

#### 5.6 Bradford Children and Families Trust

60 days has been allocated in the 2023/24 audit plan to perform audit work associated with the Bradford Children and Families Trust. The details of this have yet to be determined and agreed with the Trust. The areas to possibly audit include: Business Continuity, Change Management, Corporate Governance, Families First Programme, Financial Controls, Performance Management and Service Delivery.

#### 5.7 Computer Audit

The Computer Audit function is yet to be finalised The service is coming to the end of the first four year plan of the computer audit contract by Salford Internal Audit Services. It is the intention to enter into a further three contract for the Computer Audit Service with Salford Internal Audit Services. The contract will be agreed in early summer and will be for approximately sixty days support per annum. The Computer audit plan that covers this period is shown in Appendix E.

#### 5.8 Grants

There has been an increase in the number of grants and funding streams known to require certification in 2023/24 compared to 2022/23. As in previous years there is always potential for Internal Audit to receive notification of new grant certifications during the year. Whilst the increase in grants over the last two years was in response to the pandemic it appears that Government Departments are now requesting these certifications on a continuing basis.

Grant work has been allocated 70 days within the 2023/24 plan to complete the certifications listed below. This is a decrease of 38 days (35%) on the 108 days allocated in the 2022/23 plan to reflect that a light touch approach is being introduced to the auditing of grants. This will especially be the case for grants of low value.

Pot Hole Action Fund Grant 2022/23 WYCA Local Transport Block Funding Grant 2022/23 West Yorkshire Plus Transport Fund Grant 2022/23 Families First (Troubled Families Funding) 2023/24 Disabled Facilities Grant 2022/23 PE & Sport Grant 2022/23 Local Authority Bus Subsidy Grant 2022/23 Highways Maintenance Challenge Fund 2022/23 Active Travel Grant 2022/23 City Connect 2022/23 Transforming Cities Fund 2022/23 City Region Sustainable Transport Fund 2022/23 Getting Building Fund – One City Park 2022/23 Getting Building Fund – Bradford City Village 2022/23 Clean Air Implementation Fund Revenue Grant 2022/23 Clean Air Implementation Fund Capital Grant 2022/23 Clean Air Fund Revenue Grant 2022/23 Clean Air Fund Capital Grant 2022/23 UK Shared Prosperity Fund 2022/23 Gainshare Capacity Fund 2022/23 Levelling Up Fund 2022/23 Town Deal Funds – Shipley and Keighley 2022/23

#### 5.9 Follow Up Audits

The Chief Executive and Strategic Directors have the responsibility, in accordance with Financial Regulations, to ensure that the agreed action on Internal Audit report recommendations has been implemented; and on an annual basis Internal Audit seek written confirmation of the level of progress of implementation.

During the year Internal Audit will continue to liaise with service managers to assess the status of agreed recommendations to help form an opinion of the control framework across the Council as a whole. Narrative to support the current status of implementation will be sought and wherever possible supporting evidence obtained.

Appendix A shows that the number of resources allocated to follow ups in 2023/24 remains at 45 days to reflect the support that Internal Audit will provide to service managers to assist in the timely implementation of recommendations.

#### 5.10 Advice & Controls Awareness

Advisory and control awareness work is mainly demand led and includes provision for advice on business issues. An allocation of 92 days has been made for this work in 2023/24, which is a decrease from the 114 days allocated in 2022/23.

#### 6. WEST YORKSHIRE PENSION FUND (WYPF)

The WYPF Internal Audit Plan (see Appendix F) is for 255 days commissioned work that is split between investments and the administration of pensions. The number of days was increased from 170 in previous years to 255, from 2018/19, at the request of the WYPF Head of Finance, due primarily to increasing risk as a result of the Northern LGPS and also an increase in activity in shared services to other Pension Funds such as Lincolnshire Pension Fund, London Borough of Hounslow Pension Fund, London Borough of Barnet and Fire and Rescue Services. During 2023/24, Internal Audit will continue to use some of the extra days to increase sample sizes used in testing controls. This is due to an increase in shared service partners such as the London Borough of Barnet and further Fire and Rescue Services during 2022/23. This allows Internal Audit to provide a level of assurance on transactions in respect of the shared service partners without diluting the assurance provided for the WYPF. The extra days provided to the WYPF achieves additional income to Internal Audit of approximately £30K.

The volume and value of transactions is used to initially determine the frequency of an audit and necessitates that some of the key financial systems are reviewed more frequently than others. Consideration is also given to the significance of previous recommendations made, new legislation, new systems and the Director's priorities. The timing or frequency of an audit may change if a system is changed or Internal Audit is asked to bring forward a specific audit or has specific concerns. If new systems are introduced these will be prioritised to be audited once the system is embedded.

#### **Investments**

Equities are audited every year due to the value of the investments, (63% of WYPF's market value at 31.12.22). Other asset classes are audited on either a three or five yearly basis dependent on risk considerations.

Treasury Management is currently being audited on an annual basis following the banking crisis and the increased risk to cash holdings. The Head of Finance has also requested that we carry out a Quality Check on the WYPF statement of accounts on an annual basis.

A further piece of collaborative audit work with the Northern LGPS, the collective investment pool, will take place as part of the 2023/24 Internal Audit Plan.

#### **Pensions**

Ensuring that New Pensions and Lumps Sums are correctly calculated and paid is crucial to the success of the system because all future payments are based on this calculation. Therefore this area is audited annually, using a different pensioner type each year. In a similar way, New Pensions and Lump Sums relating to the Fire and Rescue Services is also to be audited annually, again with a different pensioner type each year.

Pensioners Payroll and Local Government Scheme Contributions are audited twice in every five year period. All of the other pension audits occur at least once in every five years subject to agreement with the Head of Finance on an annual basis.

#### Contingency

The WYPF Internal Audit Plan also contains a small contingency to accommodate requests for additional work during the year.

#### 7. COMPLIANCE WITH PUBLIC SECTOR INTERNAL AUDIT STANDARDS (PSIAS)

- 7.1 In order to comply with Public Sector Internal Audit Standards, the Service should adopt a Quality Assurance Improvement Plan (QAIP). In 2023/24 this plan will continue to focus on ensuring the Service is able to work effectively and provide the required assurances as the Council responds to the current environment. This will include determining how auditors are best able to work in the new hybrid working environment.
- 7.2 The Public Sector Internal Audit Standards External Assessment is currently being completed by CIPFA. Any agreed recommendations from the assessment will be included in the Internal Audit Services Quality Assurance Improvement Plan
- 7.3 The 2023/24 audit plan will enable the Head of Internal Audit, Insurance and Risk to form an opinion at the end of the year on the Council's control, risk and governance arrangements. The audit plan has been developed to show clearly how the work planned will contribute to forming audit conclusions on control, risk and governance that will feed into the year end opinion.
- 7.4 The Head of Internal Audit is not involved in audits where they have had either existing or previously held operational responsibility. If an audit is undertaken of Risk Management or Insurance the reports are reviewed by an Audit Manager and reported directly to the Director of Finance and IT to avoid a conflict of interest.

#### INTERNAL AUDIT PLANS FOR 2023/24 AND 2022/23 BY AUDIT ACTIVITY

	2022-23 Plan	2023-24 Plan
Full Time Equivalents (net of leave & public holidays)	9.3	8.4
	Days	Days
Fundamental Financial Systems	278	277
Significant Systems	527	456
Strategic & Departmental Risks/Council Plan	20	80
Schools	255	210
Computer Audit	60	60
Grants	108	70
Follow-up Audits	45	45
Advice & Control Awareness	114	92
West Yorkshire Pension Fund	255	260
Administration	202	187
Management: Plan Delivery	208	189
Management: Technical	45	40
Training	120	103
Non-Audit Functions	44	44
Covid 19 Support	30	0
Bradford Children and Families Trust	0	60
Contingency Provision	104	11
TOTAL PRODUCTIVE TIME	2415	2184

#### **PSIAS Standards Alignment**

The Public Sector Internal Audit Standards require the Head of Internal Audit to deliver an annual internal audit opinion that concludes on the overall adequacy and effectiveness of the Council's framework of governance, risk management and control.

The 2023/24 annual audit plan, Appendices B to F, indicates how it contributes to the forming of the annual audit opinion conclusions on control, risk and governance as follows:

C = Control

G = Governance

R = Risk Management

#### COUNCIL STRATEGIC RISKS-PLANNED COVERAGE 2023-24, 2024-25, 2025-26

	AUDIT	RAG @ Q3 22-23	Audit Plan Year	Audit Plan Year	Audit Plan Year
PSIAS			2023-24	2024-25	2025-26
R	Critical Facilities	Amber	Х		
R	Inadequate Housing Supply	Amber	Х		
R	Delivering Economic Growth	Red		Х	
R	Safer Cohesive Community	Red			Х
R	Environment and Sustainability	Red		Х	
R	Financial Resilience and Sustainability	Red			
R	Information Security	Green			X
R	Adults Demographic Change	Amber			
R	Delivery of Skills and Training Priority	Amber			Х
R	SEND Services	Amber		Х	
R	Ofsted Improvement Plan	Red -			
R	Educational Attainment	Amber			Х
R	Children Safeguarding Incident	- Red			
R	Covid Multiple Outbreaks	Red			
R	Shortage of staff within the external care market.	Red			Х
R	Elective Home Education	Amber		Х	
R	Terrorist Incident	Red			
R	Cost of Living Crisis	Red		Х	
R	Supply Chain Risk	Amber	Х		
R	Human Capital, Diversity and Talent Management	Amber	Х		
R	Digital Switchover - Adult Social Care operations	Red			X

#### **Risk Score**

Risks are assigned a score for both likelihood and the impact as follows. The risk score is calculated by multiplying the likelihood score with the impact score (each scores 1 to 4 with increasing seriousness). Risks with a score of 9 or over are determined as red and require management action to reduce or manage the risk. Scores between 6 and 8 (inclusive) are at amber and need monitoring. Risks with a score below 6 are assessed as green and should be viewed as under control.

#### **APPENDIX C**

#### FUNDAMENTAL SYSTEMS – PLANNED COVERAGE 2023-24 TO 2024-25

		AUDIT PLAN YEAR		YEAR
PSIAS	Fundamental System	2023-24	2024-25	2025-26
	Council Tax/NNDR			
C, R	Valuation/Liability/Billing/Collection/Refunds	Х		
C, R	Enforcement & Write Offs	Х	Х	
С	Reliefs and Exemptions			X
	Benefits			
C, R	Discretionary Housing Benefits	X		
C,R	Free School Meals		X	
С	HB Overpayments/UC migration/SHIP			X
	Accounts Receivable			
C, R	Invoicing/Billing	Х		
С	Recovery		Х	
C,R	Enforcement, Refunds & Write Offs			Х
С	Accounts Receivable Key Controls		Х	
C,R	Adult Social Care Accounts Receivable (post migration to 4 weekly billing maybe jointly with ASC)			Х
	Accounts Payable			
С	Requisitioning/Ordering/Receipting		Х	
С	Payments including feeder files and miscellaneous payments			Х
С	Supplier Maintenance			Х
С	Accounts Payable Key Controls	Х		
	Procurement			
C, R	Corporate Contracts & Frameworks		Х	
C, R	IR35	Х		
C, R	Agency Spend		Х	
С	Procurement Processes (Quotes, Tenders, Contracts Award) incorporating Social Value and Inclusive Growth		Х	
C, R	Purchase cards			Х
C, R	Contract Management/Variations			Х
	Payroll			
С	Starters & Leavers*		Х	Х
C, R	Certification of Pension Contributions	Х	Х	Х
C, R	Payroll Processing including temporary & permanent variations, voluntary deductions, salary sacrifice, statutory payments and Apprenticeship Levy	Х	Х	
C, R	External Payroll Provision including billing for salary costs	Х		
С	Third Party Payments			Х
С	Expenses and Allowances			Х
С	BCFT Payroll		Х	
С	Payroll Key Controls	Х	Х	Х
	* alternate between Schools and Council			

		AUD	IT PLAN Y	/EAR
PSIAS	Fundamental System		2024-25	2025-26
	Cash, Banking, Investments and Loans			
С	Cash Management (including petty cash, cash in transit, banking – alternate between Council and BCFT)	Х		
С	Controls and Payments - Cash balancing & reconciliation	Х		
С	Bank reconciliation/unallocated cash			Х
С	Bank Credit Exceptions		Х	
С	Administration of Cheques		Х	
C,R	Treasury Management			Х
	Budgetary Control			
C, R	Budgetary Control	Х		
	Capital			
C, R	Capital Programme	Х		
C, R	Capital Schemes		Х	
C, R	Final accounts review			Х
	Human Resources			
С	Flexitime / Timerecording	Х		
С	Sickness Absence		Х	
С	Hybrid Working Arrangements		Х	

## SIGNIFICANT DEPARTMENT SYSTEMS INCLUDING SCHOOLS – PLANNED COVERAGE 2023-24 TO 2025-26

Health & Wellbeing	X X X X
Wellbeing  C, R Self Directed Support (Direct Payments/ISFs etc)  C, R S117 Mental Health  C, R Transitional Planning/Preparation for Adulthood  R Better Care Fund including Support & X Enablement  Financial Support Services/  C, R Transformation and Change X Programme  C New Charging Policy (Non-Residential Care Services)  C,G BACES  C, R Deferred payment for care  C,R,G Public Health Contracts / Monitoring/Service Delivery  G Liberty Protection Safeguards  Court of Protection/Office of the Public  C, R, G Guardian/ Deputyships/ Receiverships X & Appointeeships  C,R,G Resource Allocation System  C ContrOCC & System One /Data Quality X  C,R,G Commissioned Care  C,R No recourse to public funds  R Departmental Risk Management  Children's Services  C,R,G Early Years (0-5)  C, R School Transport/Travel Assistance	X
Payments/ISFs etc)  C, R S117 Mental Health  C, R Transitional Planning/Preparation for Adulthood  R Better Care Fund including Support & X Enablement  Financial Support Services/ C, R Transformation and Change X Programme  C New Charging Policy (Non-Residential X Care Services)  C,G BACES C, R Deferred payment for care C,R,G Public Health Contracts / Monitoring/ Service Delivery  G Liberty Protection Safeguards Court of Protection/Office of the Public C, R Guardian/ Deputyships/ Receiverships X & Appointeeships  C,R,G Resource Allocation System  C C,R,G Commissioned Care C,R No recourse to public funds R Departmental Risk Management  Children's Services  C,R,G Early Years (0-5) C, R School Transport/Travel Assistance	X
C, R Transitional Planning/Preparation for Adulthood  R Better Care Fund including Support & X Enablement  Financial Support Services/ C, R Transformation and Change X Programme  C New Charging Policy (Non-Residential Care Services)  C,G BACES C, R Deferred payment for care C,R,G Public Health Contracts / Monitoring/ Service Delivery  G Liberty Protection Safeguards Court of Protection/Office of the Public C, R Guardian/ Deputyships/ Receiverships X & Appointeeships  C,R,G Resource Allocation System X C ContrOCC & System One /Data Quality X C,R,G Commissioned Care X C,R No recourse to public funds R Departmental Risk Management  Children's Services  C,R,G Early Years (0-5) C, R School Transport/Travel Assistance	X
Adulthood  R Better Care Fund including Support & X Enablement  Financial Support Services/ C, R Transformation and Change X Programme  C New Charging Policy (Non-Residential Care Services) C,G BACES C, R Deferred payment for care C,R,G Public Health Contracts / Monitoring/ Service Delivery G Liberty Protection Safeguards Court of Protection/Office of the Public C, R Guardian/ Deputyships/ Receiverships X & Appointeeships  C,R,G Resource Allocation System X C ContrOCC & System One /Data Quality X C,R,G Commissioned Care X C,R No recourse to public funds R Departmental Risk Management  Children's Services  C,R,G Early Years (0-5) C, R School Transport/Travel Assistance	Х
R Enablement Financial Support Services/ Transformation and Change Programme  C New Charging Policy (Non-Residential Care Services) C,G BACES C,R Deferred payment for care C,R,G Public Health Contracts / Monitoring/ Service Delivery G Liberty Protection Safeguards Court of Protection/Office of the Public C, R Guardian/ Deputyships/ Receiverships & Appointeeships C,R,G Resource Allocation System C,R,G Commissioned Care C,R No recourse to public funds R Departmental Risk Management Children's Services C,R,G Early Years (0-5) C, R School Transport/Travel Assistance	Х
C, R Transformation and Change Programme  C New Charging Policy (Non-Residential X Care Services)  C,G BACES  C, R Deferred payment for care  C,R,G Public Health Contracts / Monitoring/ Service Delivery  G Liberty Protection Safeguards Court of Protection/Office of the Public C, R Guardian/ Deputyships/ Receiverships X Appointeeships  C,R,G Resource Allocation System  C,R,G Commissioned Care  C,R No recourse to public funds  R Departmental Risk Management  C,R,G Early Years (0-5) C,R School Transport/Travel Assistance  X   C Are School Transport/Travel Assistance	Х
Care Services   X	Х
C, R         Deferred payment for care           C,R,G         Public Health Contracts / Monitoring/ Service Delivery         X           G         Liberty Protection Safeguards         X           Court of Protection/Office of the Public         X           C, R         Guardian/ Deputyships/ Receiverships & Appointeeships         X           C,R,G         Resource Allocation System         X           C ContrOCC & System One /Data Quality         X           C,R,G         Commissioned Care         X           C,R         No recourse to public funds         X           R         Departmental Risk Management           Children's         C         Outdoor Centres           Services         C,R,G         Early Years (0-5)         X           C,R         School Transport/Travel Assistance         X	Х
C,R,G Public Health Contracts / Monitoring/ Service Delivery  G Liberty Protection Safeguards Court of Protection/Office of the Public C, R Guardian/ Deputyships/ Receiverships & Appointeeships  C,R,G Resource Allocation System  C,R,G Commissioned Care C,R No recourse to public funds  R Departmental Risk Management  Children's Services  C,R School Transport/Travel Assistance  X  X  X  C,R,G Commissioned Care X  C,R,G Commissioned Care X  C,R No recourse to public funds X  C School Transport/Travel Assistance	
C,R,G   Service Delivery	X
Court of Protection/Office of the Public C, R Guardian/ Deputyships/ Receiverships & Appointeeships  C,R,G Resource Allocation System	X
C, R Guardian/ Deputyships/ Receiverships X & Appointeeships  C,R,G Resource Allocation System X  C ContrOCC & System One /Data Quality X  C,R,G Commissioned Care X  C,R No recourse to public funds X  R Departmental Risk Management  Children's C Outdoor Centres  C,R,G Early Years (0-5) X  C, R School Transport/Travel Assistance	
C,R,G         Resource Allocation System         X           C         ContrOCC & System One /Data Quality         X           C,R,G         Commissioned Care         X           C,R         No recourse to public funds         X           R         Departmental Risk Management         C           Children's Services         C,R,G         Early Years (0-5)         X           C,R,G         Early Years (0-5)         X           C,R         School Transport/Travel Assistance         X	
C         ContrOCC & System One /Data Quality         X           C,R,G         Commissioned Care         X           C,R         No recourse to public funds         X           R         Departmental Risk Management           Children's         C         Outdoor Centres           Services         C,R,G         Early Years (0-5)           C, R         School Transport/Travel Assistance         X	
C,R         No recourse to public funds         X           R         Departmental Risk Management           Children's Services         C         Outdoor Centres           C,R,G         Early Years (0-5)         X           C,R         School Transport/Travel Assistance         X	
R   Departmental Risk Management   Children's   C   Outdoor Centres   C,R,G   Early Years (0-5)   X   C,R   School Transport/Travel Assistance   X	
Children's Services         C Outdoor Centres         X           C,R,G Early Years (0-5)         X           C, R School Transport/Travel Assistance         X	
C,R,G Early Years (0-5) X C,R School Transport/Travel Assistance X	Χ
C, R School Transport/Travel Assistance X	Χ
5,11	
R,G Education Attendance/Safeguarding X	
R Departmental Risk Management X	
C,R,G Trust Contractual Side X	
Transitional Planning/Preparation for C, R Adulthood (cross cuts with H&WB and Trust)	
C,R,G School Funding Allocation	Χ
Corporate R Risk Management X	
Resources  C, R  Building Maintenance/Services/TF/ CAFM	Х
R,G Health & Safety X	
C, R Rents incl miscellaneous, market and other rents	
C, R Energy Management / Carbon X Reduction / Utilities	
C,R,G Housing Revenue Account X	
C, R Insurance X	

	C,R,G	Exception to Contract Standing Orders	Х		
	C, R	Members' Allowances		Х	
	С	Grants certification	Х		
	R,G	Key Decision Making/Legal Compliance	Χ		
	C, R	FM Catering and Cleaning Service	Χ		
	R	Departmental Risk Management		X	
	G	Annual Governance Process	Χ		
Place	C,R	S106 and Community Infrastructure Levy			Х
	С	Museum Artefacts		Х	
	C, R	Waste Management/Recycling		Х	
	C, R	Licensing (Taxis etc)			Х
	R,G	Grants to Voluntary Organisations	Χ		
	С	Car Parking		X	
	С	Transport incl vehicle repairs and maintenance, fuel recharge		X	
	C, R	Homelessness/Housing			Х
	С	Planning Applications and Building Regulations Fees			Х
	C,G	Regeneration Grants / Loans/Business Rates Relief			Х
	С	Cemeteries and Crematoria			X
	С	Clean Air Fund Exemption	Χ		
	R	Departmental Risk Management		X	
Chief	G	Performance Management	Χ		
Executive	G	Conflicts of Interest	Χ		
	G	Partnership Governance		Х	
	R	Departmental Risk Management			Х
Schools	C, G, R	School Audits - Finance and Governance	Х		
	G,R	Safeguarding & Recruitment			Х
	C,G,R	Themed Audit		X	
	С	Independent Payroll		X	
	C, G, R	SFVS Assessment	Χ		
	C, G, R	SFVS Training	Х		
	C, R	In Control news letter	Х		
	С	6 <sup>th</sup> Form Funding Assurance	Х		

#### **COMPUTER AUDIT PLAN 2023/24 TO 2025/26**

	Audit	Rationale	Audit days
1	Physical security and Environment - Data Centres and core sites	The core/engine of the whole ICT infrastructure. If ICT get this wrong, then it highlights a major concern about how they are managing the rest of ICT. It is critical that these rooms are secure, resilient and can withstand physical and environmental attacks.	6
2	Vulnerability management	Failure to effectively manage vulnerabilities in a timely and controlled manner could have a devastating impact in service availability and continuity. Managed poorly and the council could ground to a halt following an attack and suffer significant financial penalties	10
3	Hardware Asset Management	Failing to track assets from cradle to grave allows opportunities for items to disappear and not be traced	10
4	Email Management	Deemed a critical system for communication and it is paramount that it is always available, data is managed and effective encryption is used	10
5	Third party access management	Significant concerns over poorly managing 3rd party access. Rightly scored high in the assessment due to the powerful level of access usually given to 3rd party suppliers.	10
6	PCI/DSS compliance	Significant risk - if you are not compliant or get it wrong, ultimately the banks can remove your ability to pay by card, which would have a devastating operational impact on collecting income.	10
7	Service desk management	a major system for recording all ICT related issues. The knock on effect of not managing this service effectively will impact on all core service management areas.	20
8	ICT business continuity and disaster recovery	critical that service is always available and when there is a failure/outage/incident ICT must have robust and resilient systems in place to respond and recover asap	20
9	Mobile Device Management	Data breaches will be significant without an effective mobile device management system. Common areas where organisations get things wrong are poor configuration and poor authentication.	10
10	Software Asset and Licence Management	Similar concerns with hardware asset management. There are financial impacts and reputational damage to not effectively managing the estate. E.g. under/over utilisation of licenses, uncontrolled and unauthorised software installed	15
11	Application Management (Finance or social care)	it is critical that all core applications that store, process, transport and manage personal and sensitive data are being effectively managed. Poor access control and audit trails are common place	10
12	Network management	All ICT service run through a network and ineffective management over the network could result in unnecessary unplanned downtime and will affect service continuity	10
13	CONTINGENCY	CONTINGENCY TO BE SHARED BETWEEN YEARS	39

#### WEST YORKSHIRE PENSION FUND AUDIT PLAN 2023-24 to 2025/26

	Audit Plan Year			ear
			2024/25	2025/26
PSIAS	Pensions Administration			
С	Local Government Scheme Contributions	Х		
С	New Pensions and Lump Sums	Х	Х	Х
С	Transfers Out			Х
С	Transfers In		Χ	
С	Reimbursement of Agency Payments			
С	Life Certificates			Χ
С	AVC Arrangements			
С	Admission of New Bodies		Х	
С	Pensioners Payroll	Х		Х
С	Purchase of Additional Pension			
С	Annual Benefit Statements		Х	
0	New Pension and Lump Sums - Fire		Х	Х
С	Service	X		
G	Information Governance including GDPR			Х
С	Accuracy of Contributions Recorded on			
	Member Records	X		
С	Exit Credits			х
G	Business Continuity			Х
С	Recruitment and Selection	Х		
R	Shared Service Partner Admission			
С	Counter Fraud Work	Х		
	Investments			
С	Equities	Х	Х	Х
C,R	UK Fixed and Index Linked Public and		Х	
	Corporate Bonds			
C,R	UK and Overseas Unit Trusts (Property		Х	
	and Other)			
C,R	Fund of Hedge Funds			Х
C,R	UK and Overseas Private Equity		Х	
С	Global Bonds	Х		
0	Cash Treasury Management (Short term		Х	Х
С	Lending)	X		
С	Stock Lending			
0	Compliance with IAP Investment			Х
С	Decisions and Policies	X		
С	Verification of Assets			Х
С	Infrastructure	Х		
C,R	Listed Alternatives			Х
C,R	GLIL			
C	Annual Accounts Verification	Х	Х	Х
C,R,G	NLGPS Collaborative Work - NPEP	Х		





# Report of the Director of Finance and IT to the meeting of the Governance and Audit Committee to be held on the 15<sup>th</sup> June 2023

F

#### Subject:

**External Review of Internal Audit** 

#### **Summary statement:**

This report provides feedback on the recent CIPFA review to determine the Internal Audit function's compliance with the UK Public Sector Internal Audit Standards.

#### **EQUALITY & DIVERSITY:**

An effective Internal Audit Service provides assurance that the appropriate governance and accountability arrangements are in place which allows service objectives to be delivered in accordance with the Council's equality policies

Christopher Kinsella
Director of Finance and IT

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Portfolio:

Corporate Improvement Area:

Corporate

#### 1. SUMMARY

1.1 This report provides feedback on the recent Chartered Institute of Public Finance and Accountancy (CIPFA) review to determine the Internal Audit function's compliance with the UK Public Sector Internal Audit Standards (PSIAS).

#### 2. BACKGROUND

- 2.1 The Accounts and Audit Regulations 2015 require the Council to have an Internal Audit (IA) function which operates in accordance with best professional practice. Compliance with the Public Sector Internal Audit Standards (PSIAS) is acknowledged as adhering to best practice. One of the requirements is the need for an external assessment of the IA service under Standard 1312 External Assessments which states. External assessments must be conducted at least once every five years by a qualified, independent assessor or assessment team from outside the organisation.
- 2.2 In 2018 the last time an external assessment was carried out the Governance and Audit Committee took the Peer Review Option which was undertaken by the Internal Audit Team from Doncaster Metropolitan Council. That assessment was that Bradford Council's Internal Audit Service *Partially Conforms* with the Standards. Deviations from the Standards were highlighted but these did not preclude the internal audit activity from performing its responsibilities in an acceptable manner.
- 2.3 The main reasons for this assessment were
  - The service had a low level of resources, which restricted the programme of work performed.
  - Only 46% of the mainstream Bradford Council block of the overall audit programme was completed by January 2018. It is noted that other blocks of the overall audit programme – i.e. Schools, Grants, Pension Fund were much further progressed and, when taking these into account, the progress in completing the overall audit programme was 62%.
  - The Head of Internal Audit had other responsibilities which accounted for 50% of their time.
  - Some documentation needed updating and some reporting requirements were not met.
  - The annual audit opinion given by the HolA did not explicitly include a conclusion on risk management or governance arrangements.
- 2.4 In response to this report a service improvement plan was adopted by the s151 post holder. This saw the recruitment of four additional Senior Auditors to support the team and a number of updates to working practices were initiated.
- 2.5 In June 2022 the Governance and Audit Committee approved the appointment of an independent assessor to undertake the PSIAS review. After a procurement process the Chartered Institute of Public Finance and Accountancy were selected to complete the review
- 2.6 The assessment has taken place over the last three months and the final report is attached as Appendix A. The assessment concludes that the Internal Audit Service generally conforms with the Public Sector Internal Audit Standards which is the

highest level of compliance. A number of improvement actions have been included in the report which Internal Audit management have agreed to. The four most important actions are identified below.

- Present the full audit charter to the Governance and Audit Committee Annually
- Define the term Senior Management in the audit charter.
- Define the terms 'assurance services and 'consulting services' in the audit charter
- All audits in the published audit plans should be prioritised and aligned to the Council's or Pension Fund objectives

#### 3. OTHER CONSIDERATIONS

None

#### 4. FINANCIAL & RESOURCE APPRAISAL

4.1 The cost of the external review was approximately £6k.

#### 5. RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 The external assessment provides assurance that Internal Audit is focused on the risk management, internal control and proper governance arrangements which operate within the Council.

#### 6. LEGAL APPRAISAL

6.1 The Committee must satisfy itself that it has fulfilled its obligations as set out in the 2015 Regulations, which were drawn up to set out provisions on financial management, annual accounts and audit procedures applying to local authorities. Carrying out an external review of Internal Audit as proposed in this report contributes to adhering to the best practice professional auditing standards as required by the regulations

#### 7. OTHER IMPLICATIONS

#### 7.1 SUSTAINABILITY IMPLICATIONS

There are no direct sustainability implications.

#### 7.2 GREENHOUSE GAS EMISSIONS IMPACTS

There are no direct impacts on Gas Emissions

#### 7.3 COMMUNITY SAFETY IMPLICATIONS

There are no direct community safety implications.

#### 7.4 HUMAN RIGHTS ACT

There are no direct Human Rights Act implications.

#### 7.5 TRADE UNION

There are no implications for the Trade Unions arising from the report.

#### 7.6 WARD IMPLICATIONS

There are no Ward Implications

#### 7.7 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

None

#### 7.8 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

#### 8. NOT FOR PUBLICATION DOCUMENTS

None

#### 10. RECOMMENDATIONS

10.1 That the Committee note the report and agree the Improvement Plan included in the CIPFA external quality assessment of the Internal Audit Service.

#### 11. APPENDICES

**Appendix A:** External Quality Assessment of Conformance to the Public Sector Internal Audit standards. City of Bradford Metropolitan District Council Internal Audit Service

#### 12. BACKGROUND DOCUMENTS

Public Sector Internal Audit Standards 2017 Local Government Application Note for the United Kingdom Public Sector Internal Audit Standards CIPFA 2019



## External Quality Assessment of Conformance to the Public Sector Internal Audit Standards

City of Bradford Metropolitan District Council's Internal Audit Service

**Final Report** 

Lead Associate: Ray Gard, CPFA, FCCA, CFIIA, DMS

**Quality Assessment: Diana Melville, FCPFA** 

1 June 2023

## City of Bradford Metropolitan District Council 's Internal Audit Service

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#### 1. Introduction

1.1 Internal audit within the public sector in the United Kingdom is governed by the Public Sector Internal Audit Standards (PSIAS), which have been in place since 1<sup>st</sup> April 2013 (revised 2016 and 2017). All public sector internal audit services are required to measure how well they are conforming to the standards. This can be achieved through undertaking periodic self-assessments, external quality assessments (EQA), or a combination of both methods. However, the standards state that an external reviewer must undertake a full assessment or validate the Internal Audit Service's own self-assessment at least once in a five-year period.

#### 2. Background

- 2.1 The Internal Audit Service provides internal audit and consultancy services to City of Bradford Metropolitan District Council and the West Yorkshire Pension Fund. The Chief Audit Executive is the Council's Head of Internal Audit, Insurance and Risk (referred to as the Head of Internal Audit in this report). He is supported by an Audit Manager, two Assistant Audit Managers, six Senior Auditors, and two Internal Audit Graduate Trainee posts, (one of which was vacant at the time of the EQA).
- 2.2 The Head of Internal Audit is an experienced internal audit professional who is a CCAB accountant (CIPFA). All the Team members, apart from the Internal Audit Graduate Trainee, are experienced internal audit professionals, each having at least ten years internal audit experience. All team members hold relevant professional qualifications.
- 2.3 From an operational perspective, the Internal Audit Service is part of the Department of Corporate Services and the Head of Internal Audit reports directly to the Director of Finance, who is the Council's Section 151 Officer. The Head of Internal Audit meets frequently with the Section 151 Officer and attends regular meetings of the Finance and Systems Directorate Management Team. He also attends meetings through the year with the External Auditor and the Council's Monitoring Officer. He attends all meetings of the Council's Governance and Audit Committee and has direct access to the Chair of the Committee. Regular reports on the audit plan, progress on delivering the plan and the annual opinion and outturn, are made to the Corporate Leadership Team and the Governance and Audit Committee.
- 2.4 The Internal Audit Service has been operating under PSIAS since its launch in 2013, and this is the second external quality assessment (EQA) that they have commissioned, the previous one being in 2018.
- 2.5 Internal Audit has an audit manual that provides the auditors with a comprehensive guide to all aspects of performing an internal audit or consultancy assignment. The Service uses standard templates for all terms of reference, engagement working papers, testing schedules, and audit reports, with all documents retained in the Service's MK Insight audit management application. Supervision of the engagements takes place at every stage of the process and is recorded in MK Insight.
- 2.6 There is a quality assurance process in place that includes internal and external quality assessments of the Service, reviews of live engagements, a post-audit client feedback survey, and final clearance of all completed reports by the Head of Internal Audit, all of which feed into the Internal Audit Service's Quality Assurance and Improvement Programme (QAIP).

#### 3. Validation Process

3.1 This validation of the Service's self-assessment comprised a combination of a review of the evidence provided by Internal Audit; a review of a sample of completed internal audits; and interviews with key stakeholders, using MS Teams. The interviews focussed on determining the strengths and weaknesses of Internal Audit and assessed the

- Service against the four broad themes of Purpose and Positioning; Structure and Resources; Audit Execution; and Impact.
- 3.2 The Internal Audit Service provided a comprehensive range of documents that they used as evidence to support their self-assessment, and these were available for examination prior to and during this validation review. These documents included the:
  - self-assessment against the standards;
  - quality assurance and improvement plan (QAIP);
  - evidence file to support the self-assessment;
  - the audit charter;
  - the annual report and opinions
  - the audit plan and strategy;
  - · audit procedures manual;
  - a range of documents and records relating to the team members;
  - progress and other reports to the Governance and Audit Committee.

All the above documents were examined during this EQA.

- 3.3 The main phase of the validation process started in the week commencing 6 March 2023, with further work and interviews undertaken during the following weeks. This phase of the EQA involved a review of a sample of audit files and interviews with a sample of key stakeholders. Overall, the feedback from the interviewees was positive with clients valuing the professional, knowledgeable, and objective way the Internal Audit Service delivered their services.
- 3.4 The assessor reviewed examples of completed audits, to confirm his understanding of the audit process used at the Council, and to determine how Internal Audit has applied the PSIAS and LGAN in practice.

#### 4. Opinion

It is our opinion that the self-assessment for the City of Bradford Metropolitan District Council's Internal Audit Service is accurate, and we therefore conclude that the Internal Audit Service GENERALLY CONFORMS to the requirements of the Public Sector Internal Audit Standards and the CIPFA Local Government Application Note.

4.1 The table below shows the Internal Audit Service's level of conformance to the individual standards assessed during this external quality assessment:

Standard / Area Assessed	Level of Conformance
Mission Statement	Generally Conforms
Core principles	Generally Conforms
Code of ethics	Generally Conforms

Standard / Area Assessed	Level of Conformance
Attribute standard 1000 – Purpose, Authority and Responsibility	Partially Conforms
Attribute standard 1100 – Independence and Objectivity	Generally Conforms
Attribute standard 1200 – Proficiency and Due Professional Care	Generally Conforms
Attribute standard 1300 – Quality Assurance and Improvement Programmes	Generally Conforms
Performance standard 2000 – Managing the Internal Audit Activity	Generally Conforms
Performance standard 2100 – Nature of Work	Generally Conforms
Performance standard 2200 – Engagement Planning	Generally Conforms
Performance standard 2300 – Performing the Engagement	Generally Conforms
Performance standard 2400 – Communicating Results	Generally Conforms
Performance standard 2500 – Monitoring Progress	Generally Conforms
Performance standard 2600 – Communicating the Acceptance of Risk	Generally Conforms

## 5. Areas of full conformance with the Public Sector Internal Audit Standards

#### 5.1 Mission Statement and Definition of Internal Audit

The mission statement and definition of internal audit from the PSIAS are included in the audit charter.

#### 5.2 Core Principles for the Professional Practice of Internal Auditing

The Core Principles, taken as a whole, articulate an Internal Audit function's effectiveness, and provide a basis for considering the organisation's level of conformance with the Attribute and Performance standards of the PSIAS.

The clear indication from this EQA is that the Core Principles are embedded in Internal Audit's procedures and working methodologies and they are a competent, experienced, and professional Service that generally conforms to all ten elements of the Core Principles.

#### 5.3 Code of Ethics

The purpose of the Institute of Internal Auditors' Code of Ethics is to promote an ethical culture in the profession of internal auditing, and is necessary and appropriate for the profession, founded as it is on the trust placed in its objective assurance about risk management, control, and governance. The Code of Ethics provides guidance to internal auditors and in essence, it sets out the rules of conduct that describe behavioural norms expected of internal auditors and are intended to guide their ethical conduct. The Code of Ethics applies to both individuals and the entities that provide internal auditing services.

The clear indication from this EQA is that the Internal Audit Service conforms to the Code of Ethics, and this is embedded in their procedures, and their audit methodologies. The code of ethics is part of their overarching culture and underpins the way the Service operates.

#### 5.4 Attribute Standard 1100 – Independence and Objectivity

Standard 1100 states that the Internal Audit activity must be independent, and internal auditors must be objective in performing their work.

The need for independence and objectivity is an integral part of any Internal Audit Service's culture. The Head of Internal Audit reports in his own name directly to the Corporate Leadership Team and to the Governance and Audit Committee. All employees declare any potential impairment to their independence or objectivity on an annual basis.

We have reviewed the Internal Audit Service's procedures and their standard documentation; their quality assurance and improvement plan; and a small sample of completed audit files. We have also reviewed their reporting lines and their positioning within the organisation. The Head of Internal Audit has responsibilities for the Council's risk management and insurance functions as well as Internal Audit, and this is included in the audit charter in the section on the independence and objectivity of the Internal Audit Service. There is a robust process in place to mitigate any potential impairment to the independence of the Head of Internal Audit where the audit of these functions is carried out by one of the Audit managers and the output from the audit is reported directly to the Council's Section 151 Officer. However, the annual report and opinion does not mention the independence and objectivity of either the Head of Internal Audit or the Service as a whole. It should be noted that the essence of the audit charter is a document that 'looks forward', whereas the annual report specifically 'looks back' at the year just finished. It is therefore recognised as good practice to reaffirm Internal Audit's independence and objectivity in the annual report and include a specific statement to confirm that there have not been any impairments to that independence during the year. If, on the other hand, there has been an impairment, this should be included in the annual report, along with a description of the action taken by the Head of Internal Audit to mitigate the impact of the impairment.

We have included an action regarding this observation in Appendix A of this report. Notwithstanding the above, we are satisfied that the Internal Audit Service generally conforms with attribute standard 1100 and the LGAN.

#### 5.5 Attribute Standard 1200 – Proficiency and Due Professional Care

Attribute standard 1200 requires the Internal Audit Services' engagements are performed with proficiency and due professional care, having regard to the skills and qualifications of the staff, and how they apply their knowledge in practice.

It is evident from this EQA that the Internal Audit Service has a professional, experienced, and suitably qualified workforce. The Head of Internal Audit is an experienced internal audit professional who is a CCAB accountant (CIPFA). He is

supported by an Audit Manager, two Assistant Audit Managers, six Senior Auditors, and two Internal Audit Graduate Trainee posts, (one of which was vacant at the time of the EQA). There were two Audit Managers in post until August 2022, but this is no longer the case.

All the Team members, apart from the Internal Audit Graduate Trainee, are experienced internal audit professionals, each having at least ten year's internal audit experience. All the team members hold relevant professional qualifications. The Audit Manager and one of the Assistant Audit Managers are CCAB accountants (ACCA and CIPFA respectively), and the other Assistant Audit Manager is AAT qualified. Of the Senior Auditors, one is a CCAB accountant (CIPFA), one is IIA qualified, and the remainder are all AAT qualified.

As we have mentioned above, this is a very experienced Service with the Team members having many years' internal audit experience, particularly the Officers that occupy posts in the top three layers of the Team's structure. All these Officers are at an age where they may consider taking early retirement at some point in the foreseeable future. The Head of Audit is aware of the national shortage of experienced and qualified internal auditors and understands the need to not only retain the existing Team members, but to be in a strong position to fill vacant posts when they arise. All these issues have been included in a staffing business case that the Head of Internal Audit has produced for senior management to consider. This included redefining the two management layers below the Head of Internal Audit as a Deputy Head of Internal Audit post and two Audit Team Manager posts. Job descriptions for these posts have been produced and submitted for evaluation.

The Standards expect all internal auditors to maintain their knowledge and skills by undertaking appropriate and relevant continuous professional development. Each year, all Council employees are required to undertake various mandatory learning sessions which are recoded on the Council's 'Evolve' centralised learning and development system. Regarding other appropriate and relevant learning and development, the Service does have a central log of the learning and development undertaken by the Team members, but this is not reviewed by management, and it may not include all the learning and development that the staff have undertaken. As such, the Service may not have a comprehensive record of all the learning and development that has been undertaken by the Team members and may find it challenging to demonstrate that the Team members are maintaining their professional knowledge and skills. We have included this as an action for management in Appendix A.

The Service has a contract with a Greater Manchester Local Authority for specialist IT audit services, although all Team members have sufficient knowledge of the operation of high-level IT controls that they can incorporate these in their testing for the audits they undertake.

The Standards require Internal Audit Services to consider the use of data analytics when performing their audit reviews. The individual Team members have access to software that can be used for a limited degree of data analysis, such as MS Excel, but the Service does not currently have access to a specialist data extraction and analysis tool, such as 'IDEA', 'ACL' or 'Arbutus'. The Service does not currently carry out much data analytics as part of their audit methodologies. Where they do, it is performed by utilising the functionality within MS Excel, however, this package has a limited range of functionality compared to the specialist data analytics applications. We acknowledge that there is a cost attached to obtaining such a tool, however, we believe the Service should still consider purchasing a suitable product. We have included this as an advisory action in Appendix A.

The Service has access to the MS Power BI application and are using this for reporting purposes, although there may be scope to make greater use of this application. There is

an opportunity to further broaden the use of data analytics by making use of external sources of data that can be used for benchmarking purposes, such as the local authority data held in the CIPFA statistics and 'Nearest Neighbour Model' applications, which the Council should already have access to. These are now adaptable tools that should not be overlooked, particularly when auditors are preparing the terms of reference for audits as benchmarking can highlight areas where there may be scope to add value to the Council's operations, or at least challenge the current thinking. We have included this as an advisory action for management to consider in Appendix A.

Apart from the issues above, it is evident from this review that the Internal Audit Service's employees are experienced and well qualified and perform their duties with due professional care. However, there are some enhancements that the service should consider.

#### 5.6 Attribute Standard 1300 – Quality Assurance and Improvement Programmes

This standard requires the Head of Audit to develop and maintain a quality assurance and improvement programme that covers all aspects of the Internal Audit activity.

The Internal Audit Service has developed an effective quality assurance process which feeds into their quality assurance and improvement programme that ensures engagements are performed to a high standard. Supervision of audit engagements is carried out at all stages of the audit, usually by the Audit Manager or one of the Assistant Audit Managers. Evidence of the supervision is recorded throughout the audit process and recorded in the MK Insight application. The Service uses post audit client satisfaction surveys for every audit they undertake, and in addition to the quinquennial EQA, carry out self-assessments of their conformance to the Standards and the LGAN. All these processes feed into the Service's quality assurance and improvement plan (QAIP), to the Governance and Audit.

We have examined the supporting evidence provided by the Internal Audit Service during this EQA and we are satisfied that they conform to attribute standard 1300 and the LGAN.

#### 5.7 Performance Standard 2000 – Managing the Internal Audit Activity

The remit of this standard is wide and requires the Chief Audit Executive to manage the Internal Audit activity effectively to ensure it adds value to its clients. Value is added to a client and its stakeholders when Internal Audit considers their strategies, objectives, and risks; strives to offer ways to enhance their governance, risk management, and control processes; and objectively provides relevant assurance to them. To achieve this, the Chief Audit Executive must produce an audit plan and communicate this and the Service's resource requirements, including the impact of resource limitations, to senior management and the Audit and Risk Committee for their review and approval. The Chief Audit Executive must ensure that Internal Audit's resources are appropriate, sufficient, and effectively deployed to achieve the approved plan.

The standard also requires the Chief Audit Executive to establish policies and procedures to guide the Internal Audit activity, and to share information, co-ordinate activities and consider relying upon the work of other internal and external assurance and consulting service providers to ensure proper coverage and minimise duplication of efforts.

Last, but by no means least, the standard requires the Chief Audit Executive to report periodically to senior management and the Audit Committees on Internal Audit's activities, purpose, authority, responsibility, and performance relative to its plan, and on its conformance with the Code of Ethics and the Standards. Reporting must also include significant risk and control issues, including fraud risks, governance issues and other matters that require the attention of senior management and/or the audit committee.

The Internal Audit Service have comprehensive procedures in place that covers all aspects of the Internal Audit Service and are linked to their MK Insight audit management application.

The Service have developed comprehensive planning processes that take into consideration the Council's risks and objectives; the risk management and governance frameworks; the Council's objectives and priorities; any other relevant and reliable sources of assurance that are available; key issues identified by managers during planning meetings; the Service's own risk and audit needs assessments; and any emerging risks identified through horizon scanning and networking with other organisations. The Service publishes risk-based operational audit plans that are designed to provide the Council, and the West Yorkshire Pension Fund, with relevant assurance on their governance, risk management and control frameworks. Each audit is categorised to show which of the three elements it relates to, which may be more than one. The audit plans are underpinned by a comprehensive audit universe. However, none of the audits in the current published plans are prioritised, and they are not mapped or aligned to either the Council's or the Pension Fund's priorities or corporate objectives. None of the potential audits in the audit universe are aligned to the corporate objectives, however, they are all allocated a risk (priority) rating. We have included an action in Appendix A relating to this observation. The audit plan is reviewed and approved by the Corporate Leadership Team and the Governance and Audit Committee.

Details of the completed audits, together with regular updates on the progress being made on delivering the audit plan and the performance of the Internal Audit Service, are reported to the Governance and Audit Committee. An annual report and opinion are also issued at the end of the year and presented to the Governance and Audit Committee.

Notwithstanding the observation above, the indication from this EQA is that the Internal Audit Service is managed effectively and generally conforms to performance standard 2000 and the LGAN.

#### 5.8 Performance Standard 2100 - Nature of Work

Standard 2100 covers the way the Internal Audit activity evaluates and contributes to the improvement of the organisation's risk management and governance framework and internal control processes, using a systematic, disciplined and risk-based approach.

This is the approach adopted by the Internal Audit Service and is embedded in their working methodologies. During this EQA, we reviewed a sample of completed audits and examined them to see if they conformed to standard 2100, the LGAN and Internal Audit's own methodologies. We found that all the sample audit files examined during the EQA complied with all three.

The clear indication from this EQA is that the Internal Audit Service generally conforms to performance standard 2100 and the LGAN.

#### 5.9 Performance Standard 2200 – Engagement Planning

Performance standard 2200 requires Internal Auditors to develop and document a plan for each engagement, including the engagement's objectives, scope, timing, and resource allocations. The plan must consider the organisation's strategies, objectives, and risks relevant to the engagement.

The Service has an audit manual and robust supervision processes in place that include engagement planning and meets the requirements of the PSIAS. From the sample of audit files that we examined during the EQA we found that they all conformed to standard 2200, the LGAN, and the Service's own audit procedures and we, therefore, conclude that Internal Audit generally conforms to performance standard 2200 and the LGAN.

#### 5.10 Performance Standard 2300 – Performing the Engagement

Performance standard 2300 seeks to confirm that Internal Auditors analyse, evaluate and document sufficient, reliable, relevant, and useful information to support the engagement results and conclusions, and that all engagements are properly supervised.

As we have mentioned above, the Internal Audit Service have audit procedures, sound supervision arrangements, and quality assurance processes in place that meet the requirements of the standards. We reviewed the evidence provided in support of the Service's self-assessment, together with a sample of audit files to see if they conformed to the standards, and Internal Audit's own working methodologies. We found that all the evidence we examined conformed to the standards and Internal Audit's own procedures and methodologies. We therefore conclude that Internal Audit generally conforms to performance standard 2300 and the LGAN.

#### 5.11 Performance Standard 2400 – Communicating Results

This standard requires Internal Auditors to communicate the results of engagements to clients and sets out what should be included in each audit report, as well as the annual report and opinion. When an overall opinion is issued, it must take into account the strategies, objectives and risks of the clients and the expectations of their senior management, the audit committee and other stakeholders. The overall opinion must be supported by sufficient, reliable, relevant, and useful information. Where an internal audit function is deemed to conform to the PSIAS, reports should indicate this by including the phrase "conducted in conformance with the International Standards for the Professional Practice of Internal Auditing".

The Service's procedures and supervision processes cover the communication of results of individual audits and meet the requirements of the PSIAS. During the EQA we reviewed the evidence provided in support of the Service's self-assessment and the audit reports issued for a sample of audits to establish if they conformed to the standards. We found that all the evidence we examined conformed to the standards and Internal Audit's own procedures and methodologies.

We also reviewed the progress and annual reports presented to the Governance and Audit Committee and found that these also conformed to the standards and the Service's own internal procedures.

We therefore conclude that the Internal Audit Service generally conforms to performance standard 2400 and the LGAN.

#### 5.12 **Performance Standard 2500 – Monitoring Progress**

There is a comprehensive follow-up process in place, the objective of which is to monitor the client's progress towards the implementation of agreed actions. The results of the follow-up reviews are reported to the Governance and Audit Committee. From this EQA, it is evident that the Internal Audit Service generally conforms to performance standard 2500 and the LGAN.

#### 5.13 Performance Standard 2600 – Communicating the Acceptance of Risk

Standard 2600 considers the arrangements which should apply if the Chief Audit Executive has concluded that management at the client's services have accepted a level of risk that may be unacceptable to the organisation. Situations of this kind are expected to be rare, consequently, we did not see any examples of this during this review. From this EQA, it is evident that the Internal Audit Service generally conforms to performance standard 2600 and the LGAN.

# 6. Areas of partial conformance with the Public Sector Internal Audit Standards and the CIPFA Local Government Application Note

#### 6.1 Attribute Standard 1000 - Purpose, Authority and Responsibility

The purpose, authority and responsibility of the Internal Audit activity must be formally defined in an internal audit charter, consistent with the Mission of Internal Audit and the mandatory elements of the International Professional Practices Framework (the Core Principles for the Professional Practice of Internal Auditing, the Code of Ethics, the Standards, and the Definition of Internal Auditing). The internal audit charter must be reviewed regularly and presented to senior management and the audit panel for approval.

There is an audit charter in place, and this is reviewed by the Head of Audit on an annual basis. Any changes to the audit charter are reported to the Governance and Audit Committee. However, the full audit charter has not been presented to the Committee since 2019. We have made one recommendation relating to this observation in section eight of this report.

We reviewed this document and found it to be comprehensive and well written and contains many of the elements that the PSIAS expects to be included in an audit charter. We have, however, made some observations where the audit charter could be enhanced.

The Standards require the terms 'Chief Audit Executive', 'Senior Management' and the 'Board' to be defined in the audit charter. Section 1.6.2 sets out the terms 'Chief Audit Executive' and the 'Board' but does not include the term 'Senior Management'. This needs to be added to the audit charter, ideally at section 1.6.2.

The Standards also require the terms 'assurance services' and 'consulting services' are defined in the audit charter. These terms are mentioned in various places, but they are not specifically defined. Greater clarity would be achieved if these two terms are defined in the audit charter. Section 5 of the audit charter sets out the main activities that will be performed by Internal Audit (section 5.2), the majority of which fall under the category of 'assurance services' (although there are some that fall under the general category of 'consulting services'), so section 5 is probably the best section to place the definition for 'assurance services'.

The Standards define consulting services as "Consulting services are advisory in nature and are generally performed at the specific request of the organisation, with the aim of improving governance, risk management and control and contributing to the overall opinion". Section 10 is entitled 'consultancy work' so that is probably the best section to place the definition for 'consulting services'.

We have included the above observations as actions for management to consider in Appendix A of this report.

## 7. Areas of non-conformance with the Public Sector Internal Audit Standards and the CIPFA Local Government Application Note

7.1 There are no areas of non-conformance with the Public Sector Internal Audit Standards or the CIPFA Local Government Application Note.

### 8. Issues for management action

8.1 From this EQA we have observed four areas where conformance to the Standards could be enhanced, and we have made recommendations relating to these observations. We have also identified five advisory issues that management should consider. All these issues are set out in more detail in Appendix A of this report.

The co-operation of the Head of Internal Audit in providing the information requested for the EQA, is greatly appreciated. Our thanks also go to the Chair of the Governance and Audit Committees and the key stakeholders that made themselves available for interview during the EQA.

Ray Gard, CPFA, FCCA, FCIIA, DMS

1 June 2023

### 9. Definitions

Level of Conformity	Description
Generally Conforms	The Internal Audit Service complies with the standards with only minor deviations. The relevant structures, policies, and procedures of the internal audit service, as well as the processes by which they are applied, at least comply with the requirements of the individual Standard, the element of the Code of Ethics, and the Local Government Application Note in all material respects. This means that there is general conformance to a majority of the individual Standards, elements of the Code of Ethics, or the Local Government Application note, and at least partial conformance to the others.
Partially Conforms	The Internal Audit Service is endeavouring to deliver an effective service however, they are falling short of achieving some of their objectives and/or generally conforming to a majority of the individual Standards, elements of the Code of Ethics, or the Local Government Application note and at least partial conformance to the others. There will usually be significant opportunities to improve the delivery of effective internal audit, and enhance conformance to the Standards, elements of the Code of Ethics, and/or the Local Government Application Note. The Internal Audit Service may be aware of some of these opportunities and the areas they need to develop. Some identified deficiencies may be beyond the control of Internal Audit and may result in actions for Senior Management or the Board of the organisation to address.
Does Not Conform	The Internal Audit Service is not aware of; not making efforts to comply with; or is failing to achieve many/all of the individual Standards, elements of the Code of Ethics, or the Local Government Application Note. These deficiencies will usually have a significant adverse impact on Internal Audit's effectiveness and its potential to add value and are likely to represent significant opportunities for improvement to Internal Audit. Some identified deficiencies may be beyond the control of Internal Audit and may result in recommendations to Senior Management or the Board of the organisation.

Action Priorities	Criteria	
High priority	The Internal Audit Service needs to rectify a significant issue of non-conformance with the standards. Remedial action to resolve the issue should be taken urgently.	
Medium priority	The Internal Audit Service needs to rectify a moderate issue of conformance with the standards. Remedial action to resolve the issue should be taken, ideally within a reasonable time scale, for example six months.	

Low priority	The Internal Audit Service should consider rectifying a minor issue of conformance with the standards. Remedial action to resolve the issue should be considered but the issue is not urgent.	
Advisory	These are issues identified during the course of the EQA that do not adversely impact the service's conformance with the standards. Typically, they include areas of enhancement to existing operations and the adoption of best practice.	

#### 10. Disclaimer

This report has been prepared by CIPFA at the request of the City of Bradford Metropolitan District Council, and the terms for the preparation and scope of the report have been agreed with them. The matters raised are only those that came to our attention during our work. Whilst every care has been taken to ensure that the information provided in this report is as accurate as possible, we have only been able to base findings on the information and documentation provided to us. Consequently, no complete guarantee can be given that this report is necessarily a comprehensive statement of all the issues that exist with their conformance to the Public Sector Internal Audit Standards that exist, or of all the improvements that may be required.

The report was prepared solely for the use and benefit of City of Bradford Metropolitan District Council's Internal Audit Service, including the Officers and elected Members of the Council, and to the fullest extent permitted by law, CIPFA accepts no responsibility and disclaims all liability to any other third party who purports to use or rely, for any reason whatsoever on the report, its contents, conclusions, any extract, and/or reinterpretation of its contents. Accordingly, any reliance placed on the report, its contents, conclusions, any extract, reinterpretation, amendment and/or modification by any third party is entirely at their own risk.

### Management action plan

1. Present the full audit charter to the Governance and Audit Committee annually (Medium)		
Rationale	Agreed Action	
Although the audit charter is reviewed by the Head of Internal Audit on an annual basis, and any changes made are reported to the Governance and Audit Committee, the full audit charter has not been presented to the Committee since 2019. As the composition of the Governance and Audit Committee can change from one year to the next, it is good practice to present the full audit charter to the committee on an annual basis.	2022/23 Applied Internal Audit Papart which is	
Action Responsibility	Mark St Romaine	
Deadline	August 2023	

2. Define the term Senior Management in the audit charter (Medium)	
Rationale	Agreed Action
The Standards require the terms 'Chief Audit Executive', 'Senior Management' and the 'Board' to be defined in the audit charter. Section 1.6.2 sets out the terms 'Chief Audit Executive' and the 'Board' but does not include the term 'Senior Management'. This needs to be added to audit charter, ideally at section 1.6.2.	Agreed The updated Internal Audit Charter will define Senior Management which will include Council Management Team and the Executive and reported to the 20 <sup>th</sup> July 2023 Governance and Audit Committee.
Action Responsibility	Mark St Romaine
Deadline	August 2023

3. Define the terms 'assurance services' and 'consulting services' in the audit charter (Medium)	
Rationale	Agreed Action
The Standards also require the terms 'assurance services' and 'consulting services' are defined in the audit charter. These terms are mentioned in various places, but they are not specifically defined. Greater clarity would be achieved if these two terms are defined in the audit charter. Section 5 of the audit charter sets out the main activities that will be performed by Internal Audit (section 5.2), the majority of which fall under the category of 'assurance services' (although there are some that fall under the general category of 'consulting services'), so section 5 this is probably the best section to place the definition for 'assurance services'.	Agreed The definition of assurance and consultancy services will be included in the updated Internal Audit Charter reported to the 20 <sup>th</sup> July 2023 Governance and Audit Committee.
The Standards define consulting services as "Consulting services are advisory in nature and are generally performed at the specific request of the organisation, with the aim of improving governance, risk management and control and contributing to the overall opinion". Section 10 is entitled 'consultancy work' so that is probably the best section to place the definition for 'consulting services'.	
Action Responsibility	Mark St Romaine
Deadline	August 2023

4. Add a statement on impairments to the annual report and opinion (Advisory)	
Rationale	Agreed Action
The audit charter includes a section on the independence and objectivity of the Internal Audit Service. The annual report and opinion on the other hand, does not mention the independence and objectivity of either the Head of Internal Audit or the Service as a whole. It should be noted that the essence of the audit charter is a document that 'looks forward', whereas the annual report specifically 'looks back' at the year just finished. It is, therefore, recognised as good practice to reaffirm Internal Audit's independence and objectivity in the annual report and include a specific statement to confirm that there have not been any impairments to that independence during the year. If, on the other hand, there has been an impairment, this should be included in the annual report, along with a description of the action taken by the Head of Internal Audit to mitigate the impact of the impairment.	Agreed The Annual Internal Audit Report 2022/23 will include a statement detailing Internal Audit's conformance as an independent and objective assurance service, or if applicable a statement of impairments to these professional requirements being met, together with the action taken to mitigate the impact of the impairment.
Action Responsibility	Mark St Romaine
Deadline	August 2023

5. Ensure the Service's learning and development records are comprehensive and reviewed regularly (Advisory)	
Rationale	Agreed Action
Although the Service has a central log of the learning and development undertaken by the Team members, it is not reviewed by management and checked for completeness, so it may not include all the learning and development that the staff have undertaken. As such, the Service may not have a comprehensive record of all the learning and development that has been undertaken by the Team members and may find it challenging to demonstrate that the Team members are maintaining their professional knowledge and skills.	Agreed The Learning and Development log will be updated, checked by management for completeness and included in The Annual Internal Audit Report 2022/23. In addition, the Evolve system will be checked to see how professional training can be added to individual Auditor records
Action Responsibility	Mark St Romaine
Deadline	August 2023

6. Consider obtaining and using a specialist data analytics software application (Advisory)	
Rationale	Agreed Action
The Service does not currently have access to a specialist data extraction and analysis tool, such as 'IDEA', 'ACL' or 'Arbutus'. While we acknowledge that there is a cost attached to obtaining such a tool, consideration should be given to purchasing a suitable product as it would not only enhance the capabilities of the Service, such as undertaking data matching and data mining exercise, and using continuous auditing / monitoring of key systems, but they would also be able to provide enhanced assurance by testing the whole data population when carrying out audits with large quantities of electronically held data, rather than sample testing and extrapolating the results to the whole population.	A review of the options for data extraction and analysis will be undertaken by the Internal Audit Team to see what improvements could be delivered for Bradford Council. This will include a review of any benefits that can be realised from benchmarking.
Action Responsibility	Mark St Romaine
Deadline	January 2024

7. Use of benchmarking data when scoping audits (Advisory)	
Rationale	Agreed Action
There is an opportunity to further broaden the use of data analytics by making use of external sources of data for benchmarking purposes, such as the local authority data held in the CIPFA statistics and 'Nearest Neighbour Model' applications, which the Council should already have access to. These are now adaptable tools that should not be overlooked, particularly when auditors are preparing the terms of reference for audits as benchmarking can highlight areas where there may be scope to add value to the Council's operations, or at least challenge the current thinking.	A review of the options for data extraction and analysis will be undertaken by the Internal Audit Team to see what improvements could be delivered for Bradford Council. This will include a review of any benefits that can be realised from benchmarking.
Action Responsibility	Mark St Romaine
Deadline	January 2024

8. All audits in the published audit plans should be prioritised and aligned to the Council's or Pension Fund's objectives. (Medium)	
Rationale	Agreed Action
The Service publishes a risk-based operational audit plan that is designed to provide the Council and/or the West Yorkshire Pension Fund with relevant assurance on their governance, risk management and control frameworks. Each audit is categorised to show which of the three elements it relates to, which may be more than one. The audit plans are underpinned by a comprehensive audit universe. However, none of the audits in the current published plans are prioritised, and they are not mapped or aligned to either the Council's or the Pension Fund's priorities or corporate objectives. None of the potential audits in the audit universe are aligned to the corporate objectives, however, they are all allocated a risk (priority) rating.	
Action Responsibility	Mark St Romaine
Deadline	April 2024

9. Consultation on the International Professional Practice Framework (Advisory)	
Rationale	Agreed Action
Management should be mindful of the fact that a consultation on revising the Institute of Internal Auditors global International Professional Practice Framework (IPPF) which is incorporated into the PSIAS, commenced on 1 March 2023. Whilst this will not impact on the Service's current level of conformance, any changes to the Standards arising from the consultation may affect the Service's conformance in the medium term. It is, therefore, suggested that the Head of Internal Audit considers the contents of the consultation document and keeps a watching brief on the developments to the Standards and how this may impact the Service in the medium term.	The Head of Internal Audit is currently being updated on the new framework through their attendance at the Yorkshire Heads of Internal Audit Meeting. Currently there is no indication there will be any significant impact on the overall operation of Internal Audit, but this situation will be kept under review.
Action Responsibility	Mark St Romaine
Deadline	January 2024





# Report of the Director of Finance and IT to the meeting of the Governance and Audit Committee to be held on 15 June 2023

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#### Subject:

Consideration of the Appointment of Independent Members or an Advisor to the Governance and Audit Committee.

#### **Summary statement:**

CIPFA's Position Statement: Audit Committees in Local Authorities and Police 2022 recommends the appointment of independent members to the Audit Committee. This report details the issues around the appointment of independent members or an advisor to Bradford Council's Governance and Audit Committee.

#### **EQUALITY & DIVERSITY:**

An effective Governance and Audit Committee provides assurance that the appropriate decision making processes and accountability arrangements are in place which allows Service Objectives to be delivered in accordance with the Council's equality policies

Christopher Kinsella Director of Finance and IT

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Portfolio:

Corporate Improvement Area:

Corporate

#### 1 SUMMARY

- 1.1 CIPFA's Position Statement: Audit Committees in Local Authorities and Police 2022 recommends the appointment of independent members to the Audit Committee. This report details the issues around the appointment of independent members or an advisor to Bradford Council's Governance and Audit Committee.
- 1.2 On the 23<sup>rd</sup> March 2023 the Governance and Audit Committee recommended the following to Council
  - for Article 9 of the Council's constitution to be amended so that the composition of the Governance and Audit Committee includes either non-voting Independent members or a non-voting Independent Advisor. That the proposal is supported by a report detailing the advantages and disadvantages of the alternatives.
  - that the recruitment process of the non-voting Independent members or a non-voting Independent Advisor be delegated to the Director of Finance and IT in consultation with the Chair of Governance and Audit Committee. The Governance and Audit Committee need to determine whether they wish to recommend to Council the appointment of one, two or no Independent Members to the Committee.

#### 2. BACKGROUND

2.1 In 2022 CIPFA updated its Position statement on Audit Committees in Local Authorities and the Police with supporting guidance. CIPFA has recommended the appointment of at least two co-opted Independent Members to Audit Committees in England to provide appropriate technical expertise. Although there is no current legal requirement to do so, the government is considering making it a statutory requirement to include an independent member on audit committees.

The GAC at present does not have an independent member. There are no statutory definitions of 'independent' for audit committee members in local authorities however The Local Government and Elections (Wales) Act 2021 defines a lay member as a person who:

- is not a member or an officer of any local authority
- has not been a member or an officer of any local authority in the last 12 months
- is not the spouse or civil partner of a member or officer.
- 2.2 In relation to the difference between an advisor and an independent member, for the purposes of this report, the main difference is that an advisor could be provided by an organisation through a contract, whereas a member is a specific individual with a direct relationship with the Council that cannot be transferred. The professional responsibilities of an advisor or a member should be no different nor should the way they undertake the role.
- 2.3 Whilst it is not specifically mentioned an independent member of the Governance and Audit Committee should be politically neutral and not a member of a political party. The benefits to the Committee of an independent member, would be the technical expertise they could bring to the work of the Committee, in respect of their understanding of both internal and external audit processes and the ability to review

statutory accounts. Bradford Council's Governance and Audit Committee also has responsibility for the West Yorkshire Pension Fund. An independent member with either Pension Fund or investment experience would provide a further critical resource in these areas of activity.

- 2.4 There are some potential pitfalls to the use of independent members that should also be borne in mind.
  - Over-reliance on the independent members by other committee members in local authorities can lead to a lack of engagement across the full committee.
  - A lack of organisational knowledge or 'context' among the independent members when considering risk registers or audit reports.
  - There is a risk that the posts will not be filled creating additional pressure on the Councillors who are members of the Committee.
  - Both independent members and officers/staff must try to establish an effective working relationship and appropriate protocols for briefings and access to information.

These factors should be considered when developing the committee structure and plans put in place to provide an appropriate level of support to the audit committee members.

- 2.5 If independent members are to be appointed, the vacancy will need to be advertised. Finding a suitable candidate may take time and whether the post holder would be paid an allowance would need to be considered A clear role description should be established which addresses the following areas:
  - The role of the co-opted independent member, including expected time commitment and location of meetings.
  - The suggested appointment period and options for renewal (two terms would be a suggested maximum appointment period).
  - The definition of 'independent' applicable to the role.
  - Any restrictions or conflicts of interest that would make a candidate unsuitable. As
    the role is non-political and requires working with elected representatives in a local
    authority, it is recommended that candidates should not be political party
    members.
  - Vetting requirements
  - Desired knowledge, experience and skills.
  - Payment of allowances and expenses if any.
  - The expected conditions of engagement, including adherence to the authority's Members' code of conduct, disclosure of interests, etc.
  - Council orientation and support that will be provided in the role.
- 2.6 Consideration needs to be given to attracting suitable candidates. Normal practice in recruitment for non-executive roles such as this will be a CV and supporting letter. Adopting this approach may assist in attracting candidates. The inclusion of the current GAC chair in this process would be essential and the opportunity to meet senior Councillors would emphasise the value of the GAC.

- 2.7 It must be noted that neighbouring Councils have had significant difficulty in recruiting to their independent member roles. However, the Council may be able to reduce this risk by
  - Selecting candidates beyond the local area. If candidates are able and willing to travel to attend the required meetings and supporting activities, then living outside the authority area should not be a barrier to suitability.
  - Working with other authorities in the region to promote and support opportunities to be an independent member.
  - Advertising nationally or using specialist agencies if professional knowledge and skills are required.
  - The opportunity for an informal discussion on the role with a senior officer or committee chair.
  - Ensuring an easy application process
- 2.8 In relation to the appointment of an Independent Advisor this would have the benefit that the delivery of the service could be continuous and not dependent on an individual. The service could be procured through a tendering process and the type of professional advice clearly detailed. The clear disadvantage of this approach is that it is a new concept and in the future may not comply with any statutory requirements

#### 3. OTHER CONSIDERATIONS

3.1 The workload of the GAC is extremely heavy with two sets of accounts and audit arrangements to monitor.

#### 4. FINANCIAL & RESOURCE APPRAISAL

4.1 The appointment of one or two independent members will have costs attached but these will not be significant. Any proposals to pay co-opted Independent Members an allowance or expenses would need to be considered by the Independent Remuneration Panel. If an independent advisor was to be appointed then the price would be determined through the tendering process, this could see a significantly larger cost being incurred.

#### 5. RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 The effective operation of the GAC is essential for the Council's management of risk.

#### 6. LEGAL APPRAISAL

- 6.1 Section 151 of the Local Government Act 1972 requires every local authority to make arrangements for the proper administration of its financial affairs.
- 6.2 The Accounts and Audit Regulations 2015 state that a local authority is responsible for "a sound system of internal control which facilitates the effective exercise of its functions and the achievement of its aims and objectives; ensures that the financial and operational management of the authority is effective and includes effective arrangements for the management of risk". CIPFA states that Audit committees in

local authorities are necessary to satisfy the wider requirements for sound financial management and internal control.

- 6.3 A person who is disqualified under the Local Government Act 1972 for being a member of the Local Authority is also disqualified for being a member of a committee of that authority
- 6.4 The Local Authorities (Members' Allowances) (England) Regulations 2003 permit the Council to pay an allowance to a co-opted Member of a Committee. This would require the Members' Allowances Scheme to be amended to provide for this. The Scheme can only be amended by Full Council, which must have regard to a report from the Independent Remuneration panel on such a proposal.
- 6.5 Section 13 (1) of the Local Government and Housing Act 1989 says that a co-opted member of a committee established under Section 102 of the Local Government Act 1972 (i.e. a committee discharging the functions of the Council) must be a non-voting member. However, it is possible to appoint a co-opted member with voting rights to certain other committees including advisory committees. CIPFA's view is that where an audit committee is operating as an advisory committee under the Local Government Act 1972, making recommendations, then all members of the committee (including any co-opted members) should be able to vote on those recommendations. However, where a council has delegated decisions to the committee, for example the adoption of the financial statements, then independent members will not be able to vote on those matters for decision. Of course the situation in Bradford is further complicated by the role GAC play in WYPF. Any co-opted member could therefore only vote on advisory matters. Legal advice would be that any co-opted independent members should be non-voting under section 13 LGHA 1989 so there can be no room for challenge.

#### 7. OTHER IMPLICATIONS

#### 7.1 SUSTAINABILITY IMPLICATIONS

The operation of an effective GAC ensures the Council's decision making complies with the principles of delivering good governance which includes the Council being able to deliver defined outcomes on a sustainable basis within the resources available.

#### 7.2 GREENHOUSE GAS EMISSIONS IMPACTS

There are no direct impacts on Greenhouse Gas Emissions

#### 7.3 COMMUNITY SAFETY IMPLICATIONS

There are no direct community safety implications.

#### 7.4 HUMAN RIGHTS ACT

There are no direct Human Rights Act implications.

#### 7.5 TRADE UNION

There are no implications for the Trade Unions arising from the report.

#### 7.6 WARD IMPLICATIONS

Specific Ward Issues are not normally areas of discussion for the GAC whose responsibilities are on a Council wide basis.

#### 7.7 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

None

#### 7.8 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

#### 8. NOT FOR PUBLICATION DOCUMENTS

None

#### OPTIONS

#### 9.1 Option 1

That the GAC recommend to Council that Article 9 of the Council's constitution be amended so that the composition of GAC includes two Independent members, subject to a recruitment process

#### 9.2 Option 2

That the GAC recommend to Council that Article 9 of the Council's constitution be amended so that the composition of GAC includes one Independent member, subject to a recruitment process

#### 9.3 Option 3

That the GAC recommend to Council that Article 9 of the Council's constitution be amended so that the composition of GAC includes one Independent Advisor subject to the completion of a tendering process.

#### 9.4 Option 4

To advise Council to maintain the current membership of the Governance and Audit Committee.

#### 10. RECOMMENDATIONS

10.1 That the GAC recommend to Council that Article 9 of the Council's constitution be amended so that the composition of GAC includes 2 Independent members, subject to a recruitment process.

10.2 That the GAC recommend to Council that the recruitment process of the Independent Members be delegated to the Director of Finance and IT in consultation with the Chair of Governance and Audit Committee.

#### 11. APPENDICES

None

#### 12. BACKGROUND DOCUMENTS

- CIPFA's Position Statement: Audit Committees in Local Authorities and Police 2022
- Audit committees Practical Guidance for Local Authorities and Police 2022 Edition. CIPFA
- Council Constitution Article 9 Governance and Audit Committee

