

# LONDON BOROUGH OF CROYDON

<b>REPORT:</b>	<b>CABINET</b>		
<b>DATE OF DECISION</b>	<b>27 March 2024</b>		
<b>REPORT TITLE:</b>	<b>2023-24 Period 9 Financial Performance Report</b>		
<b>CORPORATE DIRECTOR</b>	<b>Jane West Corporate Director of Resources (Section 151 Officer)</b>		
<b>LEAD OFFICER:</b>	<b>Allister Bannin, Director of Finance (Deputy S151)</b>		
<b>LEAD MEMBER:</b>	<b>Cllr Jason Cummings, Cabinet Member for Finance</b>		
<b>KEY DECISION? 0624EM</b>	<b>Yes</b>	<b>Key Decision – Decision incurs expenditure, or makes savings, of more than £1,000,000 or such smaller sum which the decision-taker considers is significant having regard to the Council’s budget for the service or function to which the decision relates</b>	
<b>CONTAINS EXEMPT INFORMATION?</b>	<b>No</b>	<b>Public Grounds for the exemption: N/A</b>	
<b>WARDS AFFECTED:</b>	<b>All</b>		

## 1 SUMMARY OF REPORT

- 1.1 This report provides the Council’s financial performance as at Period 9 (December 2023) for the General Fund, Housing Revenue Account (HRA) and the Capital Programme. The report forms part of the Council’s financial management process for publicly reporting financial performance on a monthly basis.

### Financial Performance Summary Table

Financial Performance Area	2023-24 Revised Budget (£m)	2023-24 Forecast (£m)	2023-24 Forecast Variance (£m)	2023-24 Forecast Variance (%)
Revenue Forecast (General Fund)	340.9	339.4	(1.5)	(0.4%)
Revenue Forecast (Housing Revenue Account)	-	12.0	12.0	N/A
Capital Forecast (General Fund)	124.0	104.0	(20.0)	(16.1%)
Capital Forecast (Housing Revenue Account)	37.2	39.0	1.8	4.8%

## 2 RECOMMENDATIONS

For the reasons set out in the report, the Executive Mayor in Cabinet is recommended:

- 2.1** to note the General Fund revenue budget outturn is forecast to underspend by £1.5m at Period 9, after the budgeted utilisation of £63m capitalisation directions requested from DLUHC.
- 2.2** to note the progress in Medium Term Financial Strategy (MTFS) savings achievement of £32.4m (89.8%) against the total savings target of £36.1m as set out in paragraph 4.102.
- 2.3** to note the work that has commenced on the Council's Transformation Programme as set out from paragraph 4.97.
- 2.4** to note the Housing Revenue Account (HRA) revenue budget outturn is forecast to overspend by £12.0m.
- 2.5** to note the General Fund capital programme 2023-24 forecast underspend of £20.0m against the revised capital budget of £124.0m. The 2023-24 General Fund capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024.
- 2.6** to note the HRA capital programme 2023-24 forecast overspend of £1.8m against the revised capital budget of £37.2m. The 2023-24 HRA capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024.
- 2.7** to approve within the multi-year HRA capital budget the re-profiling of £2.071m budget from 2024-25 to 2023-24. This is to align the budget with the acquisition of the Belgrave and Grosvenor site and freehold of the previous Printworks site on Portland Place from Brick By Brick in March 2024, as set out from paragraph 4.141.
- 2.8** to note the Council's historic borrowing and subsequent debt burden continues to be critical to the non-sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of structural indebtedness to ensure it can deliver sustainable local government services.
- 2.9** to note that the Council continues to operate Spend Control Panels to ensure that tight financial control and assurance oversight are maintained.
- 2.10** to note that current forecasts are based on the best available information at the time and will be subject to review and change during the financial year.

### **3 REASONS FOR RECOMMENDATIONS**

- 3.1** The Financial Performance Report is presented monthly to Cabinet and provides a detailed breakdown of the Council's financial position and the in-year challenges it faces. It covers the General Fund, Housing Revenue Account (HRA) and Capital Programme. The Financial Performance Report ensures there is transparency in the financial position, and enables scrutiny by the Executive Mayor, Cabinet, Scrutiny & Overview Committee and the public. It offers reassurance regarding the commitment by Chief Officers to more effective financial management and discipline.

### **4 BACKGROUND AND DETAILS**

- 4.1** The 2023-24 budget approved by Council in March 2023 set a net revenue budget of £340.9m. This required capitalisation directions from government of £63m to balance, owing to resolving historical inaccurate accounting treatments and to fund the ongoing annual cost of servicing the disproportionate level of debt.
- 4.2** The Council's historic legacy borrowing and debt burden continues to be critical to the non-sustainability of the Council's revenue budget.

#### **Cost of Living Considerations**

- 4.3** There are a number of inflationary pressures that the Council, like all local authorities, is managing. The UK's Consumer Prices Index (CPI) inflation rate was 4.0% in the 12 months to December 2023, remaining higher than the Bank of England's target rate of 2% albeit reduced from the peak of 11.1% in October 2022. The inflationary impact goes beyond the Council as the cost of living is affecting all households and businesses.
- 4.4** These macro-economic factors are impacted by international events and, therefore, well beyond the control of Croydon Council. Despite the limitations, the Council is seeking to support households wherever possible.
- 4.5** A dedicated cost of living information hub has been established on the Council's website. This provides a single source of information, informing residents of the financial support available and signposting to further support, advice and guidance.
- 4.6** The Council provides a wide range of support for residents that may be struggling owing to cost of living pressures. These include:
- Discretionary support for residents in financial hardship, including the Household Support Fund

- Council Tax Support Scheme – for residents on a low income or in receipt of benefits, Council Tax bills could be reduced by up to 100%
- Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax)
- Housing Revenue Account (HRA) discretionary fund targeted for tenants that are not in receipt of housing benefit
- Benefits calculator, to ensure residents receive the support to which they are entitled
- Energy advice, including heating and money saving options, through the Croydon Healthy Homes service
- Free holiday activity clubs with healthy meals for children
- Croydon Works to help residents into employment or to receive training to support them into work and funding of the voluntary sector to provide advice and guidance

**4.7** The cost of living information hub also signposts residents to a range of support provided by other organisations in Croydon, including:

- NHS Healthy Start vouchers for families
- Free school meals
- Support from voluntary, community and faith sector organisations
- Support for businesses through the London Business Hub and the British Business Bank
- CroydonPlus credit union which offers affordable ways to manage money, including savings accounts and loans

## **GENERAL FUND REVENUE BUDGET SUMMARY**

**4.8** The General Fund revenue forecast outturn shows an overall underspend of £1.5m, however this is following the budgeted utilisation of the £63m capitalisation directions requested from DLUHC. Although the current overall forecast does not utilise the risk contingency budget, individual service directorates in an overspend position will work to bring their positions within budget as well.

**Table showing the revenue forecasts by Directorate**

Directorate	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)	Prior Month Forecast Variance (£m)	Change in Forecast Variance (£m)
Adult Social Care and Health	140.8	115.2	139.3	(1.5)	(1.3)	(0.2)
Assistant Chief Executive	43.8	28.3	42.6	(1.2)	(1.2)	-
Children, Young People and Education	101.4	60.7	105.5	4.1	4.1	-
Housing	23.9	24.5	23.9	-	-	-
Resources	38.3	138.0	35.4	(2.9)	(2.9)	-
Sustainable Communities, Regeneration & Economic Recovery	73.9	63.7	73.9	-	-	-
<b>Subtotal Service Directorates</b>	<b>422.1</b>	<b>430.4</b>	<b>420.6</b>	<b>(1.5)</b>	<b>(1.3)</b>	<b>(0.2)</b>
Corporate Items and Funding	(81.2)	(30.2)	(81.2)	-	-	-
<b>Total Net Expenditure Budget</b>	<b>340.9</b>	<b>400.2</b>	<b>339.4</b>	<b>(1.5)</b>	<b>(1.3)</b>	<b>(0.2)</b>

- 4.9** Work will continue through to the end of the year to manage those areas with forecast overspends to ensure the Council remains within budget.
- 4.10** The Council continues to build on the improvements in financial management that were made in the last financial year. However, there is a considerable amount yet to do, which is fully recognised within the organisation.
- 4.11** A financial assurance process and independent challenge of expenditure and income takes place. This is in addition to Cabinet and Scrutiny & Overview Committee review. The assurance meetings provide the Corporate Director of Resources (Section 151 Officer) and the Chief Executive with an opportunity to scrutinise and challenge the forecast outturn, review risks and opportunities, and ensure that savings are delivered and income targets are met. The meetings ensure the Council is doing all it can to reduce overspends and deliver a balanced budget.

## DIRECTORATE VARIANCES

### ADULT SOCIAL CARE AND HEALTH (ASCH)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Adult Social Care Operations	122.0	113.5	121.6	(0.4)
Adult Strategic Commissioning, Policy & Improvement	16.9	0.2	15.8	(1.1)
Central ASCH	1.9	1.5	1.9	-
<b>Total ASCH</b>	<b>140.8</b>	<b>115.2</b>	<b>139.3</b>	<b>(1.5)</b>

- 4.12** At period 9 the ASCH directorate has a forecast underspend of £1.5m (1.1%) against a budget of £140.8m which is an improvement of £0.2m from period 8.

**4.13** The ASCH directorate has challenging savings targets totalling circa £10m to deliver in 2023-24 on placements and care packages through demand management, commissioning and review of care packages.

Adult Social Care Operations - Forecast underspend of (£0.4m)

**4.14** Staffing across this division demonstrates a forecast underspend (broken down by area below) owing to periods of vacancy above the £1m MTFS 5% vacancy factor saving applied to staffing budgets in 2023-24. There is a national shortage of both social workers and occupational therapists and recruitment to many roles is proving challenging. The staffing underspend is reduced by the need to employ agency social workers and occupational therapists to ensure statutory duties are met and that transformation is delivered.

**4.15** Localities and Living Independently For Everyone (LIFE) have an underspend of (£1.5m) owing to a net underspending on care of (£0.9m) and staffing (excluding agency) of (£0.7m), partially offset by an overspend on equipment costs of £0.1m. LIFE includes integrated hospital discharge, rehabilitation and reablement services.

**4.16** Working Age Adults and Transitions has an overspend of £3.6m. This comprises an overspend on care of £3.7m (owing to clients with increased care needs) which is partly mitigated by an underspend in staffing of (£0.1m). The service is managing demand to reduce pressures coming into the service and this is estimated to have resulted in a positive impact on the forecast of circa £2m. The service is on target to achieve savings of £5.3m and has committed to achieving further savings to offset the budget pressure.

**4.17** Provider Services has a (£1.5m) forecast underspend on staffing owing to vacancies. This is a favourable movement of (£0.2m) since period 8.

**4.18** Safeguarding service has a (£0.2m) forecast underspend on staffing owing to vacancies across the service.

**4.19** Business Compliance and Early Intervention has a (£0.1m) forecast underspend on staffing owing to vacancies.

**4.20** Mental health services have a (£0.7m) forecast underspend owing to the application of external discharge funding.

Adult Social Care Policy and Improvement – Forecast underspend of (£1.1m)

**4.21** The Policy and Improvement division is forecasting an underspend of (£1.1m) owing to staffing vacancies and minor contract underspends.

Central ASCH – Forecast breakeven position

**4.22** This area is forecast to breakeven against the budget for central staffing and non-pay budgets.

#### 4.23 Risks

Risks continue in the provider market from inflation including higher fuel, labour and property costs which may result in claims for increased fees and/or financial instability with the potential for 'handing back' contracts. The potential reprovisioning costs if providers exit the market could be significant. It should be noted that this risk is already materialising. Providers are requesting increases in costs for existing care packages and new placements are increasing in costs. These are included in the forecast and are hardest felt in the working age adult cohort.

#### 4.24 Opportunities

Savings achievement is improving and will continue to support the forecast outturn for the ASCH directorate.

### **ASSISTANT CHIEF EXECUTIVE (ACE)**

<b>Division</b>	<b>Net Budget (£m)</b>	<b>Actuals to Date (£m)</b>	<b>Forecast (£m)</b>	<b>Forecast Variance (£m)</b>
Policy, Programmes and Performance	5.2	3.8	4.7	(0.5)
Elections Service	0.4	0.1	0.4	-
Croydon Digital and Resident Access	33.6	21.0	33.1	(0.5)
Chief People Officer	3.9	2.6	3.7	(0.2)
Central ACE	0.7	0.7	0.7	-
Covid Grants	-	0.1	-	-
<b>Total ACE (General Fund)</b>	<b>43.8</b>	<b>28.3</b>	<b>42.6</b>	<b>(1.2)</b>
<b>Public Health Grant Ringfenced Services</b>	<b>-</b>	<b>8.5</b>	<b>-</b>	<b>-</b>

4.25 At period 9, the ACE directorate has a General Fund forecast underspend of £1.2m (2.7%) against a budget of £43.8m.

Policy, Programmes & Performance Division - £0.5m forecast underspend

4.26 Recruitment is continuing into the new staffing structure for the Policy, Programmes and Performance Division. The forecast underspend is owing to periods of vacancy of some posts in the new structure.

Elections Service - breakeven position

4.27 There is a breakeven forecast against budget for the Council's core Elections Service.

Croydon Digital and Resident Access Division - £0.5m forecast underspend

4.28 Underspends in Concessionary Travel are forecast owing to staff vacancies and a favourable final concessionary travel settlement for the year.

Chief People Officer Division - £0.2m forecast underspend

**4.29** Staffing related underspends and lower than expected training expenditure is offsetting the overspend in the payroll service owing to the delay in the restructure of the team.

Central Assistant Chief Executive – breakeven position

**4.30** There is a breakeven forecast against budget for the Central Assistant Chief Executive.

Public Health Division – breakeven position in ringfenced grant after movement in reserves

**4.31** It is currently forecast that Public Health will contribute £3.7m to ring fenced Public Health reserves at the end of 2023-24.

**4.32** A Council wide task and finish group was set up in July 2023 to address underspends in the Public Health Grant for the current year, and the accumulated balance on the balance sheet as an earmarked Public Health reserve from underspends in previous years.

**4.33** Work has been ongoing this year to identify areas of additional allocation of grant. A revised investment plan is due to be presented by the Director of Public Health to the Corporate Management Team in April 2024 which will set out investments agreed to date, and future potential investment in public health services and activities. This will ensure that grant is fully allocated for 2024-25 and future years.

**4.34** Risks

Elections - The majority of the costs of administering the London Assembly, Mayor of London, and a potential General Election, in 2024 will be reclaimed from the Greater London Authority (GLA) and the UK Government's Consolidated Fund. As the criteria for reclaiming costs have not yet been set, there is a risk that the Council may incur costs which cannot be reclaimed which would need to be funded corporately. Any such costs will fall in the 2024-25 financial year.

**4.35** Opportunities

There are no opportunities to report on at this time for the ACE directorate.

## **CHILDREN, YOUNG PEOPLE AND EDUCATION (CYPE)**

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Children's Social Care	76.0	50.3	79.6	3.6
Unaccompanied Asylum-Seeking Children (UASC) and UASC Care Leavers	(0.3)	4.8	0.2	0.5
Asylum Seekers and Homes for Ukraine	-	(6.5)	-	-
Quality, Commissioning and Performance Improvement	7.6	4.3	7.7	0.1
Non-DSG Education Services	17.6	7.4	17.5	(0.1)
Central CYPE	0.5	0.4	0.5	-
<b>Total CYPE (General Fund)</b>	<b>101.4</b>	<b>60.7</b>	<b>105.5</b>	<b>4.1</b>
<b>Dedicated Schools Grant (DSG) High Needs Education Services</b>	<b>82.0</b>	<b>62.5</b>	<b>82.7</b>	<b>0.7</b>
<b>Dedicated Schools Grant (DSG) Early Years Block</b>	<b>31.1</b>	<b>23.3</b>	<b>31.1</b>	<b>-</b>

**4.36** At period 9, the CYPE directorate has a General Fund forecast overspend of £4.1m (4.0%) against a budget of £101.4m. There is no movement since period 8.

Children's Social Care Division – forecast overspend of £4.1m (including UASC and UASC Care Leavers)

£3.3m placements overspend owing to six active high-cost placements including residential, semi-independent and secure. Four of these high-cost placements are new in the current year. Whilst the number of children in care has continued on a downward trend, unit costs for residential and semi-independent placements have risen at a faster rate e.g. the number of residential placements increased by 17%, but the full year costs for these increased by 54%.

High-cost placements are reviewed on a weekly basis with the aim of reducing spend and stepping down to family-based care with support where possible. There are a small number of children with very complex needs where the high costs of care make up a significant proportion of the overall placement budget.

£0.1m staffing underspend owing to delays in recruitment.

£0.3m under-achievement in income (including £0.5m unachieved 2022-23 MTFS NHS Funding savings which have been partially offset through other income).

£0.1m forecast overspend on Adopt London South, over and above the agreed budget owing to interagency fees and staffing costs across the consortium calculated at year end.

£0.5m overspend in the Unaccompanied Asylum-Seeking Children (UASC) budget because of the disproportionate number of care experienced young people who were formerly unaccompanied children. At 18 years old the grant provided by the Home Office to the Council for young people's care and support reduces significantly.

Quality, Commissioning and Performance Improvement Division – forecast overspend of £0.1m

- 4.37** The division is forecasting a staffing overspend of £0.2m from the impact of increased quality assurance activity to support and assure the response to increased demand for children's social care services. The staffing pressure is being partially offset through a £0.1m forecast underspend in non-pay budgets.

Non-Dedicated Schools Grant (DSG) Education services – forecast underspend of £0.1m

- 4.38** Non-DSG Education services are still forecasting an underspend of £0.1m at Period 9, with staffing vacancies offsetting income pressures in other parts of the service.
- 4.39** £0.3m unachieved 2022-23 MTFs NHS Funding savings are being mitigated by underspends in other areas of the service.

DSG High Needs education services – forecast overspend of £0.705m

- 4.40** The SEND High Needs forecast at period 9 remains at an overspend of £0.705m against the budget of £82.059m. This represents no movement from period 8.
- 4.41** The overall variance at Period 9 represents a favourable variance of £0.020m from the expected overspend of £0.725m submitted to the Department of Education (DfE) Safety Valve Team as part of the approved Deficit Recovery Plan.
- 4.42** See below the key areas:

£2.226m Out of Borough and Independent – Forecast overspend due to two key factors: 1) significant percentage uplifts in the cost for current and new placements; and 2) continued demand for placements for the most complex cases where provision within the borough is full. This includes an additional pressure from a number of high-cost specialist medical residential placements through Tribunal direction. The service is working with our special and mainstream schools to expand local provision and placement options for September 2024 and 2025.

£1.110m overspend due to increased placements in Mainstream Education provision exceeding the budgeted allocation. This forms part of the invest to save SEND strategy in year 2.

(£0.406m) underspend in Early Years provision.

(£0.250m) underspend in top up funding related to delayed implementation of the proposed expansion of Enhanced Learning Provision across a few schools.

(£0.953m) underspend in the Service Transformation budget set up to support the DSG Deficit Recovery strategy.

(£0.400m) underspend in funding related to staffing cost in therapies and support services owing to service re-alignment to maximise savings.

(£0.622m) expected clawback from specific Resource Provision (academies) for extra funding received from DfE.

**4.43** DSG High Needs education services will continue to closely monitor the demand pressures in Independent and Out of Borough placements owing to cost implications. Addington Valley Academy, St Nicholas, Coulsdon College Croydon, and Waddon Youth Disability Services are increasing placement numbers, which is reducing high-cost placements out of borough.

**4.44** The 2023-24 period 9 High Needs forecast outturn variance of £0.705m leads to an overall DSG deficit projection of £16.089m at the end of 2023-24 compared to the Safety Valve target of £16.109m prior to the £3.290m Deficit Recovery payment from the DfE as per the Safety Valve agreement. This demonstrates that the Council is still ahead of the DfE target.

#### DSG Early Years Block – forecast breakeven position

**4.45** The Department for Education (DfE) provides six key funding streams for the Early Years Block. The budget allocation for 2023-24 is £31.088m, and a breakeven position is forecast for Period 9. The government recently announced an additional grant (Supplementary funding) of £2.507m for Croydon covering the period from September 2023 to March 2024. The DfE operational guide directs local authorities to “pass-through” 100% of the allocation to the sector and the Council is on target to meet the DfE requirements. Schools Forum was recently provided with updates on the payment to date.

#### **4.46** Risks

- The Children’s Social Care Division is monitoring placement and care package expenditure during the year. Pressure on placement spend is due to the sufficiency challenges both locally and nationally. The introduction of regulation for supported accommodation is predicted to increase charges as providers seek to pass on costs to Local Authorities. “Costs of new Ofsted regulation and inspection regime for semi-independent placement provision could be nine times higher than government funding, whilst one in five care beds could be withdrawn”, report warns – London Innovation and Improvement Alliance (LIIA).
- The service is also reviewing the housing accommodation charges from the Housing General Fund for Care Experienced Young People.
- The £0.3m unachieved income budget within the High Needs General Fund budget poses an indirect financial risk to the Safety Valve target should there be a need to offset the £0.3m potential shortfall to support activities or resources (EHCP Coordinators) within the SEND service. The service is exploring all mitigating options available.
- The service is monitoring all the risks associated with the Safety Valve target which includes increasing complexity of needs requiring additional funding for special schools, increasing placement costs and extra out of borough placements to meet the local needs of some CYP pupils with complex needs.

#### **4.47** Opportunities

- There could be some staffing underspends from periods of vacancy.
- Potential underspend of £0.3m in legal costs, if the lower numbers of care proceedings and UASC age assessment challenges continue.

## HOUSING

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Resident Engagement and Allocations	23.9	24.5	23.9	-
Housing Estates and Improvement	-	-	-	-
<b>Total Housing</b>	<b>23.9</b>	<b>24.5</b>	<b>23.9</b>	<b>-</b>

- 4.48** At period 9, the Housing directorate has a General Fund forecast breakeven position against the budget of £23.9m.
- 4.49** An allocation of £1.234m has been agreed from the Contain Outbreak Management Fund (COMF) grant, with £1m supporting homelessness costs and £0.234m supporting the clearing of the homelessness casework backlog.
- 4.50** There is a crisis within the London housing market that is creating significant demand for services, has not levelled out within 2023-24 and is likely to continue to rise into 2024-25. The data available following the changeover of rent account systems to the new NEC IT system is now improving although further improvements to forecasting accuracy can be expected as data quality is addressed, reporting is developed further, and more data analysis is performed.
- 4.51** Current financial modelling of a worst-case scenario for emergency and temporary accommodation indicates that the 2023-24 overspend could be up to circa £4m and this will be monitored closely over the final months of the financial year to check whether levels of new temporary accommodation placements continue at the current higher level or return to being in line with longer term historical trends. The pressures experienced by Croydon are also being experienced across London and nationally. Government have recognised this pressure with £92k of winter pressures funding to be allocated across the seven South-West London boroughs.
- 4.52** A top-up to the Homelessness Prevention Grant (HPG) of £1.9m was announced by DLUHC to cover homelessness pressures relating to Ukrainian refugees. This funding may also be used to fund wider homelessness pressures and reporting requirements are in line with the existing HPG requirements. The grant top-up could also help offset any potential detriment to income collection resulting in the bad debt provision being increased at year end.

### Emergency Accommodation (Nightly-paid accommodation)

- 4.53** There are a number of factors that impact expenditure against this budget. Firstly, there has been a demand rise in the number of households that have been placed into Emergency Accommodation (EA). The factors that have pushed up demand include:

- 4.54** A reduction in new private rented sector (PRS) lettings which is down 41% compared to the pre-COVID average (with tenants staying longer in properties and landlords exiting the market) and private rents are now more than 20% higher than pre-COVID levels. Therefore, new lettings affordable within Local Housing Allowance (LHA) levels are increasingly rare. The LHA uprating from April 2024 will provide a significant boost to affordability but will not solve the problem.
- 4.55** Another factor is the number of asylum-seeking households which is adding a pressure on available affordable accommodation. From August 2023 the Home Office accelerated their decision making for asylum claims and give very short notice when people are to be evicted from their accommodation. This is an additional pressure as the Council does not receive any financial assistance for these households.
- 4.56** Family evictions are also increasing, potentially linked to the decrease in availability of affordable housing in the private rented sector (PRS) and the increase in evictions detailed above and subsequent short-term arrangements breaking down.
- 4.57** Additional to the increase in demand is the backlog of circa 2,000 cases identified as part of the Housing Needs restructure. More of those households are now being placed in emergency (nightly paid) accommodation.
- 4.58** There is a shortage of suitable EA to meet the increasing demand, so the Council is relying on expensive commercial hotels and families staying in accommodation with shared facilities for over 6 weeks.

#### Temporary Accommodation

- 4.59** The factors leading to demand for homelessness accommodation, particularly in London which is bearing 57% of the national homeless placement total, are also impacting the ability for Croydon to secure affordable accommodation to house those households unable to secure affordable accommodation in the private sector.

#### Risks

- 4.60** There is a Temporary Accommodation scheme, Croylease, which was active in signing on properties between 5 to 10 years ago based on cost effective rents and an agreement for the Council to return properties in a specified condition. Council repairs contractors conduct the void repair work at the point that the contract term finishes, and the landlord requests their property back. Across 2022-23 and 2023-24 landlords have been withdrawing from this scheme which resulted in significant repair costs of circa £660k in 2022-23 and we are expecting a higher level in 2023-24.
- 4.61** The suitability of housing offered to a person determined as being eligible for homeless assistance has been subject to a number of legal challenges within 2023-24. One such case has been heard in the Supreme Court with an outcome that was, in this particular case, adverse for Croydon but in the long term may have positive implications in reducing the overall level of challenge. A cost, or a provision for cost, will need to be recognised in the 2023-24 accounts at an estimated amount of £300k.

- 4.62** The implementation of the new NEC IT system experienced a delay in setting up the interfaces between NEC and the Oracle finance system. The income interface is now posting income from the NEC system into the Oracle finance system, however there are reconciliations still being carried out. There may be a requirement to increase the loss allowance (bad debt provision) at the end of 2023-24 depending on the level of income collection achieved by year end.
- 4.63** There has been a concerted effort to hold homelessness accommodation costs down across London through partnerships with organisations like Capital Letters and via the agreed Pan-London temporary accommodation rates. The rates can no longer be contained though as demand outweighs available affordable supply. At a Pan London meeting, all boroughs confirmed that they are no longer paying the agreed Pan London rates to ensure they meet their demand challenges. A combination of all these factors has led to an increase in both the average cost of emergency and temporary accommodation that Croydon can secure to meet demand, as well as an increase in the use of nightly paid emergency accommodation to compensate for the loss of some longer-term leased accommodation because of landlords leaving the market.
- 4.64** There is a potential financial risk from the fire at Sycamore House in Thornton Heath depending on the insurance claim settlement not yet finalised. This risk was provided for in the 2022-23 accounts however, if there is any difference from the estimated reimbursement of 70% of costs from the insurers, this would be an extra charge or benefit when settled.
- 4.65** There is a potential budget pressure, above the currently estimated £1.2m for 2023-24 which has been funded through the economic demand pressures budget transfer agreed in Period 3, in relation to housing benefit subsidies for the Guaranteed Rent Scheme for Care Experienced Young People.
- 4.66** There is a pressure within the housing budget due to temporary accommodation management fees of £40/week/unit which are no longer recoverable through Housing Benefit (HB) subsidy from DWP. From 1 April 2017, in line with the government announcement in the 2015 spending review, funding was devolved to Local Authorities through the Homelessness Prevention Grant with the aim of allowing Councils to better manage their temporary accommodation pressures, and this funding is instead of the HB subsidy.

#### Opportunities

- 4.67** Housing will continue to ensure the use of ringfenced Household Support Fund, Rough Sleeping initiative grants, and asylum seeker & refugee grant funding within the grant terms and to maximise the mitigating effect on general fund spend. This includes supporting households that are in rent arrears.

- 4.68** There are opportunities from accommodation that is coming on stream for placing homelessness clients, which will provide alternative accommodation and reduce the reliance on expensive nightly paid accommodation.
- 4.69** The restructure for Housing Needs has been implemented and is forming the bedrock for process and cultural change and a more cohesive journey for a homeless household. The financial benefits are expected to be realised in the longer term from better practice resulting in reduced spend on homelessness.

## RESOURCES

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Commercial Investment	19.3	7.9	16.6	(2.7)
Finance ( <i>refer note 1</i> )	17.1	121.6	17.1	-
Legal Services and Monitoring Officer	2.7	3.9	2.7	-
Insurance, Anti-Fraud and Risk	0.6	2.7	0.5	(0.1)
Internal Audit Service	0.5	0.4	0.5	-
Pensions and Treasury	0.4	1.2	0.4	-
Central Resources	(2.3)	0.3	(2.4)	(0.1)
<b>Total Resources</b>	<b>38.3</b>	<b>138.0</b>	<b>35.4</b>	<b>(2.9)</b>

*Note 1: The actuals to date are high in the Finance Division owing to Housing Benefits expenditure which will be reimbursed through DWP funding.*

- 4.70** At period 9, the Resources directorate has a General Fund forecast underspend of £2.9m (7.6%) against a budget of £38.3m.

### Commercial Investment Division – £2.7m forecast underspend

- 4.71** The division continues to forecast decreased utilities costs and improved recharging to external bodies. There are also £0.5m of staffing underspends across the division, mainly in Facilities Management owing to periods of staffing vacancy, which are being offset by a forecast decrease in recharges to capital.

### Finance Division – breakeven forecast position

- 4.72** There is a breakeven forecast position for the Finance Division. The Payments, Revenues, Benefits and Debt Service is forecasting a staffing underspend owing to staffing vacancies and increased court costs income, but these are being offset by decreased Land Charges income and temporarily increased agency staffing in strategic finance to work through historic accounting issues including the prior years' accounts.
- 4.73** A cross Council working group is operating to mitigate Housing Benefit (HB) subsidy risks by maximising HB subsidy income claims, increasing collection of HB overpayments and reducing costs. The actuals to date are high in the Division owing to HB expenditure which will be reimbursed through DWP funding.

**4.74** The Finance Division has undergone a restructure of the strategic finance service and has commenced recruitment into roles which are currently covered by agency staffing. The capacity and skills levels required in the strategic finance service have been reviewed and extra funding from growth has been requested for 2024-25.

Legal Services and Monitoring Officer Division – breakeven forecast position

**4.75** There is a £0.1m forecast underspend in the Monitoring Officer service owing to staff vacancies and an underspend against the members allowances budget.

**4.76** There is a forecast overspend in Legal Services of £0.1m owing to high levels of agency staffing.

**4.77** The Legal Services and Monitoring Officer Division is reviewing usage of external legal advice, with a view to increasing the inhouse staffing structure (moving budget from external legal expenditure in directorates) to provide more legal services internally and therefore reduce overall legal expenditure for the Council.

Other Service Areas and Central Resources - £0.2m forecast underspend

**4.78** There is a £0.1m forecast underspend in Insurance, Anti-Fraud and Risk owing to staffing savings and increased income from shared services. In addition, there are small underspends across Pensions and Treasury and Central Resources owing to staffing vacancies.

Risks

**4.79** There is a risk in the Commercial Investment Division as work continues to identify the net impact of asset disposals including the full cost of property related expenditure and loss of income streams.

**4.80** There is a risk in the Finance Division in relation to Housing Benefit subsidies including the potential impact of the roll out of Universal Credit (UC). The Council can make a claim to DWP for weekly deductions from UC to recover HB overpayments, however there is a hierarchy of deductions and HB overpayments are not at the top of the hierarchy. There is a risk for housing tenants that are claiming HB and are being migrated onto UC. If tenants do not take action to claim UC in a timely manner, they could lose their transitional protection and have decreased income on UC (which could reduce ability to pay their rent).

**SUSTAINABLE COMMUNITIES, REGENERATION & ECONOMIC RECOVERY (SCRER)**

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Sustainable Communities	56.3	55.0	57.0	0.7
Culture and Community Safety	10.3	4.8	9.4	(0.9)

Planning & Sustainable Regeneration	7.3	3.3	7.5	0.2
Central SCRER	-	0.6	-	-
<b>Total SCRER</b>	<b>73.9</b>	<b>63.7</b>	<b>73.9</b>	<b>-</b>

**4.81** At period 9, the SCRER directorate has a General Fund forecast breakeven position against a budget of £73.9m. The main potential risk areas relate to Special Educational Needs & Disabilities (SEND) home to school transport and income relating to parking enforcement, moving traffic offences and planning.

Sustainable Communities Division - forecast £0.7m overspend.

**4.82** There is a forecast £2.5m pressure for SEND home to school transport due to increased demand, a forecast £0.6m income pressure in New Roads and Street Works Act (NRSWA) coring inspections, and a £0.5m pressure in Parking Services due to connection and configuration issues with the newly installed ANPR cameras. The pressures are being partially offset through a forecast underspend of (£1.7m) in staffing owing to periods of vacancy and (£1.2m) forecast underspend in waste services owing to reduced tonnage level of waste.

Culture and Community Safety Division – forecast underspend of (£0.9m)

**4.83** The division is forecasting an underspend of (£0.9m). This is owing to underspends from reduced utility costs in contracts (£0.3m), periods of staffing vacancy (£0.4m) and underspends across the libraries service while the service is under redesign (£0.2m).

**4.84** The Culture and Community Safety Division leads on the London Borough of Culture 2023 activities, funded through external funding sources. This is a year-long celebration of Croydon’s unique identity, diverse communities and rich heritage, culture and creativity. The programme for “This is Croydon” showcases Croydon to the world. It includes major events with international headliners performing alongside emerging home-grown talent, plus hundreds of cultural activities from our communities.

Planning and Sustainable Regeneration Division – forecast overspend of £0.2m

**4.85** The division is forecasting an overspend of £0.2m. This is driven by an income under-achievement of £0.6m owing to lower activity levels to date in planning major applications and planning performance agreements. This is being partially offset by a forecast staffing underspend of (£0.4m) owing to periods of vacancy in the Growth and Regeneration Team and other services.

**4.86** The reduction in planning major applications is being experienced across the country and the GLA is reporting the reduction across London. It is these applications which bring in the most significant fees. The reduction in major applications can be attributed to several factors, which include:

- Economic factors such as increased building and material costs and increased interest rates.
- Uncertainty relating to the emerging Building Safety Bill – impacts on design and when a second staircase is required.

- Uncertainty in relation to emerging planning legislation. Implementation details are unknown and could be impacted by when the next general election will take place.

#### 4.87 Risks

- Demand for parking services has not returned to pre-pandemic levels and this is affecting all areas of parking which includes Automated Number Plate Recognition (ANPR), pay and display and on-street parking.
- Parking Services have had delays in connection with the roll out of new ANPR cameras which affect the income levels within the service.
- This past year has seen an unprecedented increase in demand and inflation for Home to School SEND Travel.
- Within the Violence Reduction Network, a further Domestic Homicide Review has been initiated which may add additional costs.

#### 4.88 Opportunities

- The SCRER directorate is actively pursuing several grant applications to further improve the financial position:
  - The Culture and Community Safety division have successfully secured grant funding from Sport England for swimming pool costs.
  - Further communications are being held with public health regarding enhancing the borough's community safety offer with direct funding.
  - Development Management has progressed for the Planning Skills Delivery Fund which will assist the service in clearing backlog of planning applications.
- There are several major schemes that are in development that should generate large fees - however these should not be submitted prematurely as this could result in significant costs.
- There could be further staffing underspends across the directorate depending on the timing, and success, of recruitment into posts.

## CORPORATE ITEMS AND FUNDING

Area of Spend	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Economic Demand Pressures	0.9	-	0.9	-
Risk Contingency Budget	5.0	-	5.0	-
Transformation Programme	10.0	-	10.0	-
Other corporate items	(97.1)	(30.2)	(97.1)	-

<b>Total Corporate Items and Funding</b>	<b>(81.2)</b>	<b>(30.2)</b>	<b>(81.2)</b>	<b>-</b>
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- 4.89** At period 9, the Corporate directorate has a General Fund forecast breakeven position against a net budget of (£81.2m). The risk contingency budget of £5m is not utilised at period 9 and remains to offset pressures that could be experienced across the Council over the remainder of the year.
- 4.90** The corporate area holds funding streams such as Council Tax, retained share of Business Rates and Core Grants. The corporate budget also holds the Council-wide risk contingency budget (£5m) and the budgets for borrowing and interest received.
- 4.91** The corporate area funds redundancy, severance and pension strain costs which contribute to achieving General Fund MTFs savings.
- 4.92** There is budget of £0.9m held centrally (of the original £5.5m agreed by full Council) for the potential impact of economic demand pressures on Croydon after the allocation of £1.7m budget in Period 3 (Housing Benefit subsidy pressures), £2.2m budget in Period 6 (emergency accommodation pressures) and £0.7m budget in Period 7 (children social worker caseload pressures).
- 4.93** The corporate area also holds the 2023-24 Transformation budget of £10m, which funds work carried out in directorates and cross-Council to achieve MTFs savings and improve services for local residents and businesses. It is expected that any underspend in 2023-24 will be carried forward in an earmarked reserve to fund projects which are being delivered over multiple financial years. The Transformation budget reduces to £5m from 2024-25.
- 4.94** There is £1.5m budget held in Corporate for adjustments to correct General Fund recharge budgets relating to the HRA, Public Health, capitalisation of salaries and corporate support (overhead) recharges, and salary and income budget corrections. The budget agreed by full Council was £7.3m and £5.8m of this was allocated out to service directorates in Period 7. The remaining budget is likely to be needed to align corporate support (SERCOP) recharge budgets, following further work to calculate up to date recharges to non-General Fund areas.
- 4.95** There is a funding risk in the Collection Fund if cost of living pressures impact the collection of Council Tax and Business Rates income, and/or increase the levels of claimants for Council Tax Support. The impact of the Council Tax increase is partially mitigated through the Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax).
- 4.96** There is borrowing cost uncertainty from interest rates and the timing of capital receipts from asset disposals.

### **Transformation Programme**

- 4.97** The Transformation Programme has £14m of resources allocated to it, consisting of £10m base revenue budget and £4m earmarked reserve.

**4.98** In total there is currently £10.2m of the Transformation Programme budget allocated with £3.8m unallocated to date. The Transformation Programme will provide a return on investment through service improvement benefits and the identification and delivery of savings for the MTFS, providing a significant level of savings towards the £20m per annum savings required from 2025-26 onwards.

### Transformation Programme Allocations

Project	2023-24 Draft Budget Allocation (£m)	Actuals to Date (£m)	Forecast Expenditure (£m)	Forecast Variance (£m)
Transformation Revenue Budget	10.000			
Transformation Reserve Funding	4.000			
<b>Total Transformation Funding</b>	<b>14.000</b>			
Approach to Strategic Planning and Commissioning	-	-	-	-
Parking Policy Review	0.200	0.113	0.200	-
Community Hubs Programme	0.250	0.001	0.250	-
HR Transformation	0.093	0.108	0.093	-
Digital & Resident Access Review/Digital Workforce	0.080	0.001	0.080	-
SEND Review	0.240	-	0.240	-
Passenger/SEND Transport Transformation	0.100	-	0.100	-
Family Justice Service Review	-	-	-	-
S117 Project	0.178	0.089	0.178	-
Joint Funding Arrangements	0.110	-	-	(0.110)
Sustaining Demand at the Front Door	0.190	0.125	0.190	-
Corporate Parenting Transformation	0.743	0.185	0.513	(0.230)
Dynamic Purchasing System	0.142	-	0.142	-
Calleydown Transformation	0.134	-	-	(0.134)
Income & Debt Review	0.050	0.015	0.050	-
Outcomes Based Domiciliary Care Model	-	-	-	-
Transition Commissioning Care Model	-	-	-	-
Croydon Campus	0.250	0.078	0.250	-
Customer Access Review	0.200	0.117	0.200	-
Building Control Transformation	0.696	0.043	0.696	-
Planning & CIL Transformation	0.450	0.017	0.450	-
CALAT	0.050	0.029	0.050	-
Housing Needs Restructure	0.260	0.082	0.260	-
Temporary Accommodation Case Review	0.491	-	0.491	-
Housing Occupancy Checks	0.291	-	0.291	-
Rent Accounts and Data Cleanse	0.026	0.040	0.026	-
Housing Association Recharges	0.059	-	0.059	-
Supported Housing Review	0.080	-	0.080	-
Adult Social Care Transformation	1.100	0.424	0.806	(0.294)
Review of Social Care Placements	-	-	-	-
Reablement & Hospital Discharge	-	-	-	-
Strategic Operating Model Design Partner for Adult Social Care and Health	1.134	-	0.601	(0.533)
Housing Benefit Subsidy SEA & EA/TA	-	-	-	-
PFI Contract Manager	-	-	-	-
VCS Review	-	-	-	-

Project	2023-24 Draft Budget Allocation (£m)	Actuals to Date (£m)	Forecast Expenditure (£m)	Forecast Variance (£m)
Asset Rationalisation	0.124	-	0.124	-
Business Intelligence Review	0.026	-	0.026	-
Commercial & Income Opportunities	-	-	-	-
Community Equipment Service	0.234	0.168	0.234	-
Croydon Museum	0.170	-	0.170	-
Oracle Improvement Programme	0.915	0.065	0.915	-
Transformation PMO	1.100	0.793	1.100	-
<b>Total Revenue Budget and Reserves Allocated to Date</b>	<b>10.166</b>	<b>2.493</b>	<b>8.865</b>	<b>(1.301)</b>
Unallocated To Date	3.834			

**4.99** The Transformation Programme published in November 2022 set out £5.9m of project commitments with recognition that further sums were still to be confirmed. Please note that project plans are under development and following review of these project plans the draft budget allocations to projects as listed above could change through the year.

**4.100** The Transformation Board has agreed additional project allocations totalling £3.731m through to December 2023. The allocations are set out in the table below.

Project Allocations	£m
Business Intelligence Review	0.026
Sustaining demand at the front door	0.080
Callydown transformation	0.134
Review of Social Care Placements	-0.005
CALAT (New)	0.050
Strategic operating model design partner for ASCH	1.134
HR Transformation	0.015
Planning & Building Control projects – project delivery support	0.396
Corporate Parenting Transformation (New and subsumes Fostering Transformation Project)	0.650
Community Equipment Service	0.234
Museum Transformation	0.170
Oracle Cloud Improvement (New)	0.915
Asset Rationalisation	0.124
Reablement & Hospital Discharge - transfer to Strategic operating model design partner for ASCH	-0.060
Family Justice Service Review	-0.100
Dynamic Purchasing System	0.050
Housing Needs Restructure	0.200
Temporary Accommodation Case Review	0.200
Outcomes Based Domiciliary Care Model	-0.082
Transition Commissioning Care Model	-0.110
Approach to Strategic Planning and Commissioning	-0.290
<b>Total of Allocations</b>	<b>3.731</b>

**4.101** The 'Review of Social Care Placements' project has secured £600,000 alternative funding from the Market Sustainability Grant thereby reducing the funding required from the Transformation budget. The revenue budget also funds the costs of the transformation Programme Management Office currently estimated at £1.1m.

## Savings

**4.102** The 2023-24 budgets include a challenging new savings target of £33.1m. Together with slippage of £3.0m from 2022-23, the total savings target is £36.1m. The forecast achievement of savings is £32.4m (89.8%). Directorates have identified risks to achievement of individual savings and have made plans to mitigate these risks, or identify alternative savings, if possible.

**Table showing 2023-24 forecast savings achievement by directorate**

Directorate	2023-24					Not yet evidenced or (over delivery)
	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings achievable £'000	Savings slippage £'000	
Adult Social Care & Health	12,243	-	12,243	13,190	-	(947)
Assistant Chief Executive	2,924	-	2,924	2,271	653	-
Children, Young People & Education	6,920	490	7,410	5,148	-	2,262
Housing	2,305	-	2,305	1,309	1,099	(103)
Resources	6,347	-	6,347	6,347	-	-
Sustainable Communities (SCRER)	1,859	2,490	4,349	4,124	225	-
Cross-Directorate / Corporate	500	-	500	-	500	-
<b>Total</b>	<b>33,098</b>	<b>2,980</b>	<b>36,078</b>	<b>32,389</b>	<b>2,477</b>	<b>1,212</b>

## Savings achievement not yet evidenced

**4.103** Assistant Chief Executive: There is forecast savings slippage of £0.653m owing to:

- Workforce restructure - £0.500m – The saving of £1m has been partially achieved with the remaining £0.5m linked to the End User Service re-

procurement and subsequent service transformation which will be achieved in 2025-26 when the current contract extension expires.

- Human Resources management team reorganisation and reduction in previously agreed growth - £0.153m - The payroll restructure was delayed. Savings have been achieved for 2024-25 and the 2023-24 position has been mitigated with underspends elsewhere in the service.

**4.104** Children, Young People & Education: There are savings of £2.3m which have not been evidenced to date:

- NHS Funding - £0.5m – Detailed analysis of the spend on health and care for children in the social care system and in schools was undertaken in 2021-22 to inform a more proportionate allocation of costs across the Council and the NHS to be achieved by 2023-24. It has proved challenging to reach agreement on increased health contribution to placement and care package costs.
- Reduce spend on Children Looked After placements - £1.7m – Whilst the number of children in Croydon’s care has continued to decrease over 2023-24, the unit costs for residential and semi-independent placements have increased at a faster rate.
- Increase Health contribution to the Integrated Commissioning Team - £0.06m – Whilst not achieved in 2023-24, the recent NHS restructure will inform a review of Council capacity to achieve this saving in 2024-25.

**4.105** Housing: There is forecast savings slippage of £1.1m owing to:

- Temporary accommodation case review (discretionary cases) - £0.5m slippage - Posts to undertake the transformation work were filled during 2023-24 and therefore the full year effect of the £0.6m savings target will not be achieved until 2024-25.
- Temporary accommodation occupancy checks - £0.3m slippage - Posts to undertake the transformation work were filled during 2023-24 and therefore the full year effect of the £0.4m savings target will not be achieved until 2024-25.
- Data cleanse and rent accounts (income collection) - £0.3m slippage - Work commenced on this project as part of the implementation of the new NEC IT system. Reconciliation work and improvements to NEC reporting are still underway to evidence these £0.3m savings.

**4.106** SCRER: There is forecast savings slippage of £0.225m relating to the saving “Review and reduction of the Neighbourhood Operations (NSO team)”. The change occurred in September 2023, providing a part-year saving in 2023-24 and the full-year saving of £0.450m will be achieved in 2024-25.

**4.107** Cross-Directorate: There is forecast savings slippage of £0.5m. The “Business Intelligence” saving of £0.25m has been developed as a transformation project for

delivery in 2024-25. For the “Consider new structures through layers and spans review” saving of £0.25m, initial scoping work has been completed including suggestions and options for potential centralisation efficiencies to reduce potential duplication of functions across the Council.

## Reserves

- 4.108** There are no budgeted contributions to, or drawdowns from, the General Fund balances of £27.5m in 2023-24. The current forecast for 2023-24 maintains this reserve.

<b>General Fund Balances</b>	<b>Forecast (£m)</b>
<b>Balance at 1 April 2023</b>	<b>27.5</b>
Forecast Contribution to/(Drawdown from) Reserves	-
<b>Forecast Balance at 31 March 2024</b>	<b>27.5</b>

- 4.109** The General Fund balances serve as a cushion should any overspend materialise by the end of 2023-24. The use of reserves to support the budget is not a permanent solution and reserves must be replenished back to a prudent level in subsequent years if used.

## Unresolved Issues

- 4.110** The Council’s overall financial position is still subject to a number of unresolved historic legacy issues. The latest position on these was set out in the 22 February 2023 Cabinet report titled ‘Revenue Budget and Council Tax Levels 2023-24’ which incorporated the findings of the ‘Opening the Books’ review undertaken in 2022-23. The report stated that a request has also been made of government to provide the Council with a Capitalisation Direction of £161.6m to cover the historic finance issues that have been revealed through the ‘Opening the Books’ programme.
- 4.111** The Council needs to correct a range of misstatements in its legacy accounts from 2019-20 which are currently still not fully closed. This was more than the £74.6m previously identified in the MTFs Update report to Cabinet in November 2022.
- 4.112** The Council’s Provision for Bad Debt was found to be understated by £46m rather than the £20m previously assumed and a prudent decision was made to include the potential £70m gap in the accounts caused by incorrect accounting for Croydon Affordable Homes and Tenures, instead of the £9m previously assumed.
- 4.113** The Capital Programme for 2022-23 included the £161.6m Capitalisation Direction requested, which was in addition to the £25m capitalisation direction previously approved.

**4.114** The Council has recently been required by an Adjudication Panel to make a payment to a former contractor in relation to a historic claim which dates back to a contract they held during the period 2011-2018. The Council has therefore requested a new Capitalisation Direction of £9.439m for 2019-20 in order to finalise the 2019-20 accounts. This is in addition to last year's request for a Capitalisation Direction of £126m in relation to 2019-20. With four years of accounts still open, there remains a risk that further legacy issues will be uncovered.

## **HOUSING REVENUE ACCOUNT (HRA)**

- 4.115** At period 9, the HRA forecast remains at a revenue overspend of £12.0m owing to resolving a backlog of historic legacy repair work, reducing voids and resolving issues experienced nationally including damp and mould and fire safety. The HRA has a reserve of circa £50m as at the end of 2022-23 and this reserve will fund the 2023-24 overspend, however the HRA budget for 2024-25 will take account of ongoing pressures and priorities.
- 4.116** At Period 5 it was set out how the legacy of repairs, disrepair works and the commissioned works on damp and mould accounts for £8.6m of the pressure against the existing budget. This pressure is a direct result of the significant under-investment over decades in the housing stock which has resulted in the backlogs the teams are now tackling. The implementation of the three new repairs contracts and the commitment to ensuring the Council is meeting its requirements as a landlord are driving this ongoing pressure. Where underspends in other areas are insufficient to cover the pressures outlined above, it will require a draw down from the HRA reserves into the revenue budgets.
- 4.117** The 2024-25 budget will require significant work to ensure that it is capturing and managing ongoing pressure areas within the repairs service. Stock conditions surveys have been commissioned to identify the level of major repairs and maintenance to be programmed into the future years' budgets and these capital improvements should reduce the level of responsive repairs over the medium term.
- 4.118** The remaining £3.4m pressure is attributed to disrepair and reflects the volume of historic legacy disrepair cases being cleared and the legal costs and settlements that have been the outcome.

## Repairs

- 4.119** The Period 9 position of £12.0m overspend is made up of £8.6m responsive repairs costs pressure and £3.4m on disrepair costs, legal fees and settlements.
- 4.120** The overspend on responsive repairs is a result of the significant increase in repair requests received from tenants as a consequence of the historical under-investment in the stock including historic legacy issues identified since the implementation of the new contracts in August 2023.
- 4.121** In addition, there has been significant work done to tackle reports of damp and mould, treating the appearances of spores and carrying out works to address the issues.
- 4.122** The Social Housing (Regulation) Act 2023 will enable a rigorous new regime that holds all landlords to account for the decency of their homes and the service they provide. This includes changes from 'Awaab's Law' which follows the death of 2 year old Awaab Ishak in 2020 due to damp and mould exposure in his Rochdale home following repair requests and complaints having been repeatedly ignored. Legislation includes provisions which will require the Council to investigate hazards and fix repairs including damp and mould in their properties within strict new time limits or rehouse residents where a home cannot be made safe. The new rules will form part of the tenancy agreement, so residents can hold landlords to account if they fail to provide a 'decent' home.
- 4.123** Tackling of legacy voids has had a significant financial impact due to the state of disrepair in these properties and the subsequent lack of asset renewal. The team expects to have cleared the backlog of legacy voids within this financial year and the associated cost pressures have been forecasted to reflect that commitment. Financial controls for all voids over £6,500 are in place and there is ongoing management of the work in progress (WIP) and the average weekly voids of 12 voids per week.
- 4.124** Legal disrepair volumes continue to be a challenge operationally and financially. Work is ongoing to tackle the circa 550 disrepair cases in our backlog. The service has proposed a plan to clear this backlog by 31 March 2025 and the details were set out in the separate Repairs Contract Update paper presented to Cabinet in February. This financial year works have been undertaken to circa 303 claims and we have works in progress for 67 cases, however, the number of claims we are receiving each month is increasing from an average of 30 to now 45 new claims being received per month.
- 4.125** The service has introduced controls to manage, monitor and provide assurance on ongoing responsive repairs costs:

- The NEC system allows management of the budget per individual line of activity with a budget set on NEC that cannot be exceeded and no payments can be made without any increase to the budget prior to any new orders being raised. Manager approval is required to increase a budget.
- A Review Panel has been established since September. Any quotes for works over a value of £5,000 must be presented to the panel and approval sought prior to the works order being raised.
- A review and approval from the Housing Directorate Management Team will be sought for works on an individual property in excess of £40,000 to allow consideration of value for money and to ensure that there is a link being made to regeneration projects and any other cross-Council projects.

### Tenancy and Income

**4.126** A breakeven forecast position at period 9 as work continues with the NEC implementation team to validate rental income and voids.

### Staffing and other

**4.127** A breakeven forecast position at period 9 reflects that additional budget was allocated in 2023-24 to meet known pressures while structural changes are being implemented.

### **Table showing the 2023-24 HRA forecast**

Description	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Rental Income	(82.1)	(61.5)	(82.1)	-
Service Charge Income	(4.6)	(3.3)	(4.6)	-
Concorde, Sycamore & Windsor (rental income for Temporary Accommodation provision)	(3.4)	(1.9)	(3.4)	-
Other Income	(6.0)	(2.2)	(6.0)	-
<b>Subtotal Income</b>	<b>(96.1)</b>	<b>(68.9)</b>	<b>(96.1)</b>	-
Housing Capital Charges	40.9	-	40.9	-
Responsive Repairs & Safety	20.4	29.8	32.4	12.0
Centralised Directorate expenditure	11.3	1.2	11.3	-
Tenancy & Resident Engagement	10.3	4.6	10.3	-
Tenant Support Services	6.7	4.1	6.7	-
Concorde, Sycamore & Windsor expenditure	3.4	2.4	3.4	-
Asset Planning	1.6	1.1	1.6	-
Capital Delivery (Homes & Schools)	1.5	1.0	1.5	-
<b>Subtotal Expenditure</b>	<b>96.1</b>	<b>44.0</b>	<b>108.1</b>	<b>12.0</b>
<b>Total HRA Net Expenditure</b>	<b>-</b>	<b>(24.9)*</b>	<b>12.0</b>	<b>12.0</b>

*\* Note that no actuals for Housing Capital Charges have been posted as these journals are carried out at year end points.*

**4.128** The main risks within the HRA are:

- NEC system functionality delays:
  - Although the system went live in June 2023, the system is yet to be used to its full capacity including full reporting functionality. The repairs and income forecasting may yet be impacted once the full integration and functionality is available.
  
- Repairs and maintenance:
  - pressures from the exit of the Axis repairs contract that ended in August 2023.
  - extra expenditure to deal with the backlog of repairs and maintenance.
  - void and disrepair costs carried out by specialist contractors to reduce void losses and minimise future disrepair claims.
  - settlement of disrepair cases and related legal fees, including those relating to Regina Road.
  
- Tenancy and income:
  - the impact of cost of living pressures on rent collection (including a potential increase in bad debt cost).
  - loss of income owing to void (empty) residential properties.
  - loss of income owing to voids including void garages.
  
- Recharge review:
  - General Fund services are producing service level agreements (SLAs) to evidence recharges of costs to the HRA, which could result in increased charges to the HRA.

### **Capital Programme and Financial Sustainability**

**4.129** The Capital strategy and programme was approved by Council in March 2023. This recognised the complex and challenging financial and operational circumstances in which the Council continues to operate. It showed a 2023-24 Capital Programme that is reduced in scale and cost compared to previous years. With circa £1.4bn of General Fund debt and an environment of rising interest rates, the delivery of an effective Asset Management Plan and an ambitious Asset Disposal Strategy, including reducing the number of buildings used by the Council, will be essential to mitigate rising cost pressures, reduce the overall debt burden and help the Council balance its books.

- 4.130** The strategy reflected the progress made to date by the Council to improve the governance and financial management of the Capital Programme following recommendations from the two Reports in the Public Interest (RIPI). The Council understands that the initial improvements put in place are the foundations of good practice and is focused on building upon these over the coming months and years.
- 4.131** Concerns were highlighted regarding value for money and investment decisions as the Council has incurred debt in investing in assets which have not retained their value and, therefore, the level of debt exceeds the value of the investment assets. In the three years between 2017-20 the Council borrowed £545m with no focused debt management plan in place. The majority of this debt comprises short-term borrowings which has left the Council exposed to current higher interest rates. The debt is anticipated to be refinanced from 2023 onwards and therefore likely to drive significant increases in annual repayment levels.
- 4.132** An estimated circa £66m is required to service this debt from the General Fund which represents around 19% of the Council's net budget. The Council's historic legacy borrowing and debt burden has, therefore, become critical to the non-sustainability of the Council's revenue budget.
- 4.133** The Council has concluded that the expenditure it is anticipated to incur in each year of the period of 2023-27 is likely to exceed the financial resources available and that reaching financial and operational sustainability without further government assistance will not be possible. The Council's 2023-24 budget required capitalisation directions from government of £63m to balance and the MTFS demonstrated an ongoing estimated budget gap of £38m per annum from 2024-25.
- 4.134** Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of historic legacy structural indebtedness to ensure it can deliver sustainable local government services. It must be noted that annual capitalisation directions (transferring revenue cost into capital cost which must be funded over 20 years) increases the Council's debt burden. Also capital receipts from the Asset Disposal Strategy are being used to fund the ongoing capitalisation directions and therefore the Council is not able to reduce its existing historic debt (a situation of "treading water").
- 4.135** Therefore, debt write-off treatment is the Council's preferred option and a request was made to DLUHC in January 2023 for government funding to write-off £540m of the Council's General Fund debt. DLUHC has subsequently asked the Council to propose a wider range of options, and these are currently being worked on.

### **General Fund Capital Programme**

- 4.136** At period 9, the General Fund capital programme has a forecast underspend of £20.0m (16.1%) against the revised budget of £124.0m. The 2023-24 General Fund capital budget has been updated to reflect the changes agreed through the Capital

Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024. This has included re-profiling of budgets to future years and is the main reason for the decrease from the General Fund capital budget of £127.1m at Period 8.

**Table showing 2023-24 General Fund Capital Programme budget and forecast**

<b>General Fund Capital Scheme</b>	<b>2023-24 Revised Budget</b>	<b>2023-24 Actuals to Date</b>	<b>2023-24 Forecast</b>	<b>2023-24 Forecast Variance</b>
	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>
Bereavement Services	127	6	127	-
My Resources Interface Enhancement	169	58	174	5
ICT	-	4	-	-
Network Refresh	152	11	152	-
Tech Refresh	292	659	285	(7)
Geographical Information Systems	312	-	116	(196)
Laptop Refresh	1,030	-	1,030	-
Cloud and DR	167	26	174	7
People ICT	-	3	-	-
Synergy Education System	858	16	715	(143)
NEC Housing System	2,725	22	2,526	(199)
Uniform ICT Upgrade	56	-	56	-
Public Switched Telephone Network Digital Migration Phase 1	163	-	163	-
<b>Subtotal Assistant Chief Executive</b>	<b>6,051</b>	<b>805</b>	<b>5,518</b>	<b>(533)</b>
Children Home DFE	329	-	104	(225)
Woodlands Family Hub	140	-	140	-
<b>Subtotal CYPE</b>	<b>469</b>	<b>-</b>	<b>244</b>	<b>(225)</b>
Disabled Facilities Grant	3,000	1,471	3,000	-
Empty Homes Grants	400	39	200	(200)
<b>Subtotal Housing</b>	<b>3,400</b>	<b>1,510</b>	<b>3,200</b>	<b>(200)</b>
Asset Strategy - Stubbs Mead	500	-	100	(400)
Asset Strategy Programme	100	-	20	(80)
Clocktower Chillers	15	-	5	(10)
Corporate Property Maintenance Programme	2,780	1398	2,365	(415)
Fairfield Halls - Council	625	4	100	(525)
Former New Addington Leisure Centre	300	-	300	-
Fieldway Cluster (Timebridge Community Centre)	248	-	148	(100)

<b>General Fund Capital Scheme</b>	<b>2023-24 Revised Budget</b>	<b>2023-24 Actuals to Date</b>	<b>2023-24 Forecast</b>	<b>2023-24 Forecast Variance</b>
	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>
Contingency	1,000	-	1,000	-
Education - Fire Safety	450	4	450	-
Education - Fixed Term Expansions	225	180	225	-
Education - Major Maintenance	3,411	3,769	3,865	454
Education - Miscellaneous	116	124	116	-
Education - Permanent Expansion	297	1	297	-
Education - SEN	1,600	654	1,309	(291)
<b>Subtotal Resources</b>	<b>11,667</b>	<b>6134</b>	<b>10,300</b>	<b>(1,367)</b>
Growth Zone	15,341	329	2,000	(13,341)
Grounds Maintenance Insourced Equipment	1,200	(602)	-	(1,200)
Highways	8,260	4,864	8,260	-
Highways - flood water management	404	459	404	-
Highways - bridges and highways structures	1,641	1,627	1,641	-
Highways - Tree works	50	6	50	-
Local Authority Tree Fund	83	148	83	-
Trees Sponsorship	42	10	42	-
Tennis Court Upgrade	75	191	75	-
Leisure centres equipment Contractual Agreement	-	(410)	-	-
Leisure Equipment Upgrade	148	143	148	-
Libraries Investment - General	224	1	224	-
Parking	1,843	916	1,843	-
Cashless Pay & Display	1,463	-	485	(978)
Play Equipment	300	245	245	(55)
Safety - digital upgrade of CCTV	1,540	11	1,540	-
Highway Road Markings/Signs (Refresh)	137	124	137	-
South Norwood Good Growth	773	11	168	(605)
Kenley Good Growth	304	(142)	304	-
Sustainability Programme	300	-	300	-
LIP	3,522	746	1,922	(1,600)
Cycle Parking	106	-	135	29
Electric Vehicle Charging Point (EVCP)	3	-	43	40
Park Asset Management	700	58	700	-
Waste and Recycling Investment	602	1,203	602	-
Ashburton Park Heritage Fund	305	-	305	-
<b>Subtotal SCRER</b>	<b>39,366</b>	<b>9,938</b>	<b>21,656</b>	<b>(17,710)</b>
Capitalisation Direction	63,000	-	63,000	-
<b>Subtotal Corporate Items and Funding</b>	<b>63,000</b>	<b>-</b>	<b>63,000</b>	<b>-</b>
<b>TOTAL GENERAL FUND CAPITAL</b>	<b>123,953</b>	<b>18,387</b>	<b>103,918</b>	<b>(20,035)</b>

**Table showing General Fund Capital Programme Financing**

<b>General Fund Capital Financing</b>	<b>2023-24 Revised Budget</b>	<b>2023-24 Forecast</b>	<b>2023-24 Forecast Variance</b>
	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>
Community Infrastructure Levy (CIL)	6,600	6,600	-
CIL Local Meaningful Proportion (LMP)	552	552	-
Section 106	1,227	342	(885)
Grants & Other Contributions	14,851	13,872	(979)
Growth Zone	15,341	2,000	(13,341)
HRA Contributions	1,772	1,617	(155)
Capital Receipts	83,610	78,935	(4,675)
Borrowing	-	-	-
<b>Total General Fund Financing</b>	<b>123,953</b>	<b>103,918</b>	<b>(20,035)</b>

**4.137** The extra forecast cost of cycle parking and electric vehicle charging points are expected to be funded through the application of Section 106 funding.

### **HRA Capital Programme**

- 4.138** At period 9, the HRA capital programme has a forecast overspend of £1.8m (4.8%) against the revised budget of £37.2m. The 2023-24 HRA capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024. The HRA has a reserve of circa £50m as at the end of 2022-23 and this reserve will be the source of financing the 2023-24 capital overspend.
- 4.139** The HRA budget for 2024-25 and the HRA business plan has taken account of ongoing pressures and priorities. Stock conditions surveys have been commissioned to identify the level of historic legacy major repairs and maintenance to be programmed into the future years' budgets and these capital improvements should reduce the level of responsive repairs over the medium to long term.
- 4.140** There are pressures relating to damp and mould related repairs and historic legacy legal disrepair and void cases where significant updating to properties is occurring.
- 4.141** The Executive Mayor in Cabinet is requested through this report to approve within the multi-year HRA capital budget, the re-profiling of £2.071m budget from 2024-25 to 2023-24. This is to align the budget with the acquisition of the Belgrave and Grosvenor site and freehold of the previous Printworks site on Portland Place from Brick By Brick in March 2024.
- 4.142** The overall HRA capital programme budget remains the same as agreed by Full Council in March 2024 and the acquisition continues to be funded through HRA reserves. The acquisition was agreed by Cabinet on 26 July 2023 through the "Brick by Brick Croydon Ltd Update Report and land acquisition by HRA - July 2023" report (link: <https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=3573>).

The earlier acquisition from Brick By Brick in 2023-24 (instead of 2024-25) provides better value for money in terms of cashflow and debt implications for the Council.

**Table showing 2023-24 HRA Capital Programme budget and forecast**

<b>HRA Capital Scheme</b>	<b>2023-24 Revised Budget</b>	<b>2023-24 Actuals to Date</b>	<b>2023-24 Forecast</b>	<b>2023-24 Forecast Variance</b>
	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>
Major Repairs and Improvements Programme	21,355	10,865	37,180	15,825
NEC Housing System	1,772	-	1,772	-
Regina Road	1,500	-	-	(1,500)
Building Safety Works	3,735	-	-	(3,735)
Repairs Referrals	8,800	-	-	(8,800)
<b>Total HRA Capital</b>	<b>37,162</b>	<b>10,865</b>	<b>38,952</b>	<b>1,790</b>

**Table showing 2023-24 HRA Capital Programme Financing**

<b>HRA Capital Financing</b>	<b>2023-24 Revised Budget</b>	<b>2023-24 Forecast</b>	<b>2023-24 Forecast Variance</b>
	<b>(£000's)</b>	<b>(£000's)</b>	<b>(£000's)</b>
Major Repairs Reserve (MRR)	15,457	15,457	-
Revenue	13,900	13,900	-
Other Reserves	5,687	7,477	1,790
Right To Buy (RTB) Receipts	2,118	2,118	-
<b>Total HRA Capital Financing</b>	<b>37,162</b>	<b>38,952</b>	<b>1,790</b>

## **5 ALTERNATIVE OPTIONS CONSIDERED**

5.1 None.

## **6 CONSULTATION**

6.1 None.

## **7. CONTRIBUTION TO COUNCIL PRIORITIES**

- 7.1** The monthly financial performance report supports the Mayor's Business Plan 2022-2026 objective one "The council balances its books, listens to residents and delivers good sustainable services".

## **8. IMPLICATIONS**

### **8.1 FINANCIAL IMPLICATIONS**

- 8.1.1** Finance comments have been provided throughout this report.
- 8.1.2** The Council continues to operate with internal spending controls to ensure that tight financial control and assurance oversight are maintained. A new financial management culture is being implemented across the organisation through increased communication on financial issues and training for budget managers.
- 8.1.3** The Council currently has a General Fund Reserve of £27.5m which serves as a cushion should any overspend materialise by the end of 2023-24. The use of reserves to support the budget is not a permanent solution and reserves must be replenished back to a prudent level in subsequent years if used.
- 8.1.4** The Council's historic legacy borrowing and debt burden continues to be critical to the non-sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of structural indebtedness to ensure it can deliver sustainable local government services.

Comments approved by Allister Bannin, Director of Finance (Deputy s151 Officer).

### **8.2 LEGAL IMPLICATIONS**

- 8.2.1** The Council is under a statutory duty to ensure that it maintains a balanced budget and to take any remedial action as required in year.
- 8.2.2** Section 28 of the Local Government Act 2003 provides that the Council is under a statutory duty to periodically conduct a budget monitoring exercise of its expenditure and income against the budget calculations during the financial year. If the monitoring establishes that the budgetary situation has deteriorated, the

Council must take such remedial action as it considers necessary to deal with any projected overspends. This could include action to reduce spending, income generation or other measures to bring budget pressures under control for the rest of the year. The Council must act reasonably and in accordance with its statutory duties and responsibilities when taking the necessary action to reduce the overspend.

- 8.2.3** In addition, the Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's Chief Finance Officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report.
- 8.2.4** The monitoring of financial information is also a significant contributor to meeting the Council's Best Value legal duty. The Council as a best value authority "must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (Section 3 Local Government Act (LGA) 1999). The Best Value Duty applies to all functions of the Council including delivering and setting a balanced budget, providing statutory services such as adult social care and children's services and securing value for money in all spending decisions.
- 8.2.5** The Council is the subject of Directions from the Secretary of State requiring the Council to, amongst others, improve on the management of its finances. This report serves to ensure the Council is effectively monitoring and managing its budgetary allocations in accordance with its Best Value Duty.
- 8.2.6** The Council's budget and policy framework procedure rules (Part 4C of the Constitution) provides that the Executive may only take decisions which are in line with the budgetary envelop approved by Full Council.

Comments approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer, 29/02/2024.

### **8.3 HUMAN RESOURCES IMPLICATIONS**

- 8.3.1** There are no immediate workforce implications arising from the content of this report, albeit there is potential for a number of the proposals to have an impact on staffing. Any mitigation of budget implications that may have direct effect on staffing will be managed in accordance with relevant human resources policies and, where necessary, consultation with the recognised trade unions.
- 8.3.2** The Council is aware that many staff may also be impacted by the increase in cost of living. Many staff are also Croydon residents and may seek support from the Council including via the cost of living hub on the intranet. The Council offers support through the Employee Assistance Programme (EAP) and staff may seek help via and be signposted to the EAP, the Guardians' programme, and other

appropriate sources of assistance and advice on the Council's intranet, including the trade unions.

Comments approved by Dean Shoesmith, Chief People Officer, 12/02/2024.

## **8.4 EQUALITIES IMPLICATIONS**

**8.4.1** The Council has a statutory duty to comply with the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010. The Council must therefore have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

**8.4.2** The aim of the duty is to ensure public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures equality considerations are built into the design of policies and the delivery of services and that they are kept under review.

**8.4.3** In setting the Council's budget for 2023-2024, colleagues responsible for key projects or savings proposals were required to complete Equality Impact Assessments (EQIAs) to support them to make such considerations. Likewise, any new policy or change to Council services across the financial year undergoes the same process.

**8.4.4** As officers deliver against the approved budget, including their delivery of savings, as monitored through this report, they will continue to monitor for any equality impacts.

Comments approved by Helen Reeves, Head of Strategy & Policy, 20/02/2024.

## **9. APPENDICES**

**9.1** None.

## **10. BACKGROUND DOCUMENTS**

**10.1** None.