

# Treasury Management activity and treasury and prudential indicators 2020-21

## 1. Introduction

- 1.1 The treasury management service is an important part of the overall financial management of the council. Whilst the prudential indicators consider the affordability and impact of capital expenditure decisions, the treasury service covers the effective funding of these decisions.
- 1.2 Strict regulations, such as statutory requirements and the CIPFA treasury management code of practice (the TM Code) govern the council's treasury activities, and the Prudential Code and MHCLG Investment Guidance non-treasury investments.
- 1.3 The Council holds a substantial amount of Investment property (non-treasury investment) and has a large capital programme which directly impacts on the treasury management decisions the Council may make.

## 2. Treasury management activity

- 2.1 The council has an integrated capital and investment strategy and manages its cash as a whole in accordance with its approved strategy. Therefore, overall borrowing may arise because of all the financial transactions of the council (for example, borrowing for cash flow purposes) and not just those arising from capital expenditure reflected in the Capital Financing Requirement (CFR).

### Investments

- 2.2 The Ministry of Housing, Communities and Local Government (MHCLG) Investment Guidance requires local authorities to focus on security and liquidity rather than yield.
- 2.3 Both the CIPFA Code and government guidance requires local authorities to invest funds prudently, and to have regard to the security and liquidity of investments before seeking the highest rate of return, or yield. The main objective, therefore, when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitable low investment income.
- 2.4 Continued downward pressure on short-dated cash rate brought net returns on sterling low volatility net asset value money market funds (LVNAV MMFs) close to zero even after some managers have temporarily lowered their fees. At this stage net negative returns are not the central case of most MMF managers over the short-term, and fee waivers should maintain positive net yields, but the possibility cannot be ruled out.
- 2.5 Security of capital remains our main objective when placing investments. We maintained this during the year by following our investment policy, as approved in our

treasury management strategy 2020-21, which defined “high credit quality” counterparties as those having a long-term credit rating of A- or higher.

2.6 Investments during the year included:

- investments in AAA rated constant net asset money market funds
- call accounts and deposits with banks and building societies systemically important to each country’s banking system. We do have some investments with overseas banks, but in sterling
- other local authorities
- corporate bonds
- non-rated building societies
- covered bonds
- pooled funds without a credit rating, but only those subject to an external assessment

2.7 We divided our investments into three types

- short-term (less than one-year) internally managed cash investments
- long-term internally managed investments
- externally managed funds

2.8 Cash balances consisted of working cash balances, capital receipts, and council reserves.

2.9 The table below shows our investment portfolio, at 31 March 2021, compared to 31 March 2020. **Appendix 4** contains a detail schedule of investments outstanding at the end of the year.

Investment details	Balance at 31-03-20 £m	Weighted Avg Return for Year	Balance at 31-03-21 £m	Weighted Avg Return for Year
<b>Internally Managed Investments</b>				
Fixed Investments < 1 year to cover cash flow	20.00	0.99%	67.00	0.94%
Corporate bonds	1.00	1.26%	2.00	0.17%
Long term bonds	18.10	1.06%	16.10	0.00%
Notice Accounts	8.00	0.90%	3.00	0.39%
Call Accounts	0.53	0.40%	0.33	0.07%
Money Market Funds	14.50	0.74%	39.22	0.13%
Revolving credit facility	5.00	1.26%	0.00	1.47%
Long term investments > 1 year	27.50	1.65%	18.50	1.21%
<b>Externally Managed Funds</b>				
Funding circle	0.53	6.35%	0.50	6.51%
CCLA	6.51	4.41%	6.49	4.81%
RLAM	2.23	2.42%	2.33	2.19%
M&G	1.13	2.54%	3.53	4.45%
Schroders	0.57	7.31%	0.70	7.04%
UBS	2.02	4.71%	2.20	3.95%
City Financials	0.00	0.00%	1.97	0.85%
<b>Total Investments</b>	<b>107.61</b>	<b>1.03%</b>	<b>168.87</b>	<b>1.08%</b>

2.10 Our level of investments increased during 2020-21, and we achieved a higher return than last year. Interest rates continue to be at an all time low.

- 2.11 The Councils also holds £10.157 million equity investments in Guildford Holdings Ltd and £8.418 million in North Downs Housing Ltd.
- 2.12 We are earning an interest return of base rate plus 5% (currently 5.10%) on the investment in North Downs Housing. This is higher than the return earned on treasury investments but reflects the additional risks to the Council of holding the investment.

### **Security of investments**

- 2.13 Counterparty credit quality was assessed and monitored with reference to credit ratings; financial institutions analysis of funding structure and susceptibility to bail-in, credit default swap prices; financial statements; information on potential government support and reports in the quality financial press.
- 2.14 We also considered the use of secured investment products that provide collateral in the event that the counterparty cannot meet its obligations for repayment.
- 2.15 The minimum long-term counterparty credit rating for 'high quality counterparties' approved for 2019-20 was A-/A3 across all three main credit rating agencies (Fitch, S&P, and Moody's).
- 2.16 The overall minimum long-term credit rating in the treasury strategy is BBB+. The strategy set different limits for different counterparty credit ratings both in maximum duration and exposure in monetary terms.
- 2.17 We also can invest in non-rated institutions subject to due diligence.

### **Liquidity of investments**

- 2.18 In keeping with the MHCLG's Guidance on Investments, the council maintained a sufficient level of liquidity using money market funds, call accounts, the maturity profile of fixed investments and short-term borrowing from other local authorities.
- 2.19 We use PSlive as our daily cash flow forecasting software to determine the maximum period for which funds may prudently be committed.

### **Yield of investments**

- 2.20 The council sought to optimise returns commensurate with its objective of security and liquidity. The Bank of England base rate decreased to 0.10% in March 2020, and it has remained at that level throughout the year.
- 2.21 We invested in longer-term covered bonds, which increased the return of the portfolio and the duration. Bonds can be sold in the secondary market should we need the liquidity.
- 2.22 The council's budgeted investment income for the year was £1.684 million and actual interest was £2.376 million, at a weighted average yield of 1.08%.

### **Externally managed funds**

- 2.23 We estimate to have cash balances over the medium-term (our “core” cash as identified in the Councils liability benchmark), and as such we have continued investing in pooled (cash-plus, bond, equity, multi-asset and property) funds. These funds have allowed us to diversify into asset classes other than cash without the need to own and manage the underlying investments. These funds operate on a variable net asset value (VNAV) basis offer diversification of investment risk, coupled with the services of a professional fund manager; they also offer enhanced returns over the longer term but are more volatile in the short term. All of our pooled funds are in the respective funds distributing share class, which pay out the income generated. They have no defined maturity date, but are available for withdrawal, some with a notice period.
- 2.24 We regularly monitor all our external funds’ performance and continued suitability in meeting our investment objectives.

### **Borrowing and debt management**

- 2.25 The council’s debt portfolio is detailed in the table below. Our loan portfolio increased by £74 million due to more short-term loans at the end of the year.

Interest calc	Lender	Loan type	Principal £'000	Initial loan period (yrs)	Period remaining years	Maturity date	Rate
<b>Long-term</b>							
Variable	PWLB	Maturity	45,000	10	1.0	28/03/2022	0.48%
Fixed	PWLB	Maturity	10,000	12	3.0	28/03/2024	2.70%
Fixed	PWLB	Maturity	10,000	13	4.0	28/03/2025	2.82%
Fixed	PWLB	Maturity	10,000	14	5.0	28/03/2026	2.92%
Fixed	PWLB	Maturity	10,000	15	6.0	28/03/2027	3.01%
Fixed	PWLB	Maturity	25,000	17	8.0	28/03/2029	3.15%
Fixed	PWLB	Maturity	25,000	20	11.0	28/03/2032	3.30%
Fixed	PWLB	Maturity	25,000	25	16.0	28/03/2037	3.44%
Fixed	PWLB	Maturity	15,000	29	20.0	28/03/2041	3.49%
Fixed	PWLB	Maturity	17,435	30	21.0	28/03/2042	3.50%
<b>Short-term</b>							
Fixed	West Yorkshire CA	Maturity	10,000	0.76	0.0	06/04/2021	0.60%
Fixed	Cardif Pinnacle Insurance PLC	Maturity	5,000	0.83	0.0	15/04/2021	0.37%
Fixed	Hampshire Fire And Rescue Authority	Maturity	1,000	0.84	0.1	04/05/2021	0.29%
Fixed	PCC Hampshire & IOW - Winchester	Maturity	2,500	0.84	0.1	04/05/2021	0.29%
Fixed	Hampshire County Council	Maturity	1,500	0.84	0.1	04/05/2021	0.29%
Fixed	Cardif Pinnacle Insurance PLC	Maturity	5,000	0.83	0.1	06/05/2021	0.37%
Fixed	London Borough of Tower Hamlets	Maturity	5,000	0.88	0.2	28/05/2021	0.30%
Fixed	West Yorkshire CA	Maturity	5,000	0.75	0.2	02/06/2021	0.50%
Fixed	Local Government Assocoation	Maturity	1,500	1.00	0.2	08/06/2021	0.40%
Fixed	North of Tyne Combined Authority	Maturity	10,000	1.00	0.3	02/07/2021	0.78%
Fixed	London Borough of Newham	Maturity	5,000	1.00	0.3	02/07/2021	0.35%
Fixed	St Helens Metropolitan BC	Maturity	10,000	1.00	0.3	12/07/2021	0.40%
Fixed	Wokingham BC	Maturity	10,000	1.00	0.3	19/07/2021	0.40%
Fixed	North Yorkshire CC	Maturity	5,000	0.41	0.3	26/07/2021	0.10%
Fixed	Cambridge City Council	Maturity	5,000	0.50	0.4	09/08/2021	0.05%
Fixed	Merseyside Fire & Rescue	Maturity	2,000	1.00	0.4	18/08/2021	0.30%
Fixed	LB Wandsworth	Maturity	5,000	0.92	0.9	22/02/2022	0.12%
Fixed	North Yorkshire CC	Maturity	5,000	1.00	0.9	25/02/2022	0.15%
Fixed	Warwickshire CC	Maturity	10,000	1.00	0.9	28/02/2022	0.15%
Fixed	Sheffield CC	Maturity	10,000	1.00	1.0	15/03/2022	0.12%
Fixed	LB Wandsworth	Maturity	5,000	1.00	1.0	25/03/2022	0.20%
<b>Total</b>			<b>310,935</b>				

- 2.26 Our primary objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should our long-term plans change being a secondary objective.
- 2.27 The rate on the variable rate loan is the average for the year.
- 2.28 We also have short-term loans outstanding at the end of the year which we took out for cash flow purposes, from other local authorities. Temporary and short-dated loans borrowed during the year from other local authorities remained affordable and attractive.
- 2.29 Affordability and the “cost of carry” remained important influences on our long-term borrowing strategy alongside the consideration that, for any borrowing undertaken ahead of need, the proceeds would be invested at rates of interest significantly lower than the cost of borrowing. As short-term interest rates have remained low, and are likely to remain low at least over the forthcoming two years, lower than long-term

rates, the council determined it was more cost effective in the short-term to use internal resources and borrow short-term to medium-term instead.

- 2.30 The Councils borrowing position is monitored regularly as to whether it is more beneficial to externalise borrowing now or whether to continue internal borrowing based on predicted future borrowing costs (which are likely to be higher). Arlingclose assist us with this 'cost of carry' and break-even analysis.
- 2.31 The PWLB raised the cost of the certainty borrowing rate by 1% to 1.8% above UK Gilt yields as HM Treasury were concerned about the overall level of local authority debt. PWLB borrowing remains available, but at a margin of 180bp above gilts appear expensive. Market alternatives are available and new products will be developed but the financial strength of individual authorities will be scrutinised by investors and commercial lenders.
- 2.32 The Chancellor's March 2020 Budget statement included significant changes to Public Works Loan Board (PWLB) policy and launched a wide-ranging consultation on the PWLB's future direction. Announcements included a reduction in the margin on new HRA loans to 0.80% above equivalent gilt yields. The value of this discount is 1% below the rate at which the authority usually borrows from the PWLB), available from 12th March 2020 and £1.15 billion of additional "infrastructure rate" funding at gilt yields plus 0.60% to support specific local authority infrastructure projects for England, Scotland and Wales for which there is a bidding process. We made a successful bid for access to the Local Infrastructure Rate for WUV and have a £100 million facility at gilts plus 0.60% to help fund the project.
- 2.33 In November 2020 the PWLB published its response to the consultation on 'Future Lending Terms'. From 26th November the margin on PWLB loans above gilt yields was reduced from 1.8% to 0.8% providing that the borrowing authority can confirm that it is not planning to purchase 'investment assets primarily for yield' in the current or next two financial years. Authorities that are purchasing or intending to purchase investment assets primarily for yield will not be able to access the PWLB except to refinance existing loans or externalise internal borrowing. As part of the borrowing process authorities will now be required to submit more detailed capital expenditure plans with confirmation of the purpose of capital expenditure from the Section 151 officer. The PWLB can now also restrict local authorities from borrowing in unusual or large amounts.
- 2.34 Acceptable use of PWLB borrowing includes service delivery, housing, regeneration, preventative action, refinancing and treasury management. Misuse of PWLB borrowing could result in the PWLB requesting that Authority unwinds problematic transactions, suspending access to the PWLB and repayment of loans with penalties.
- 2.35 Competitive market alternatives may be available for authorities with or without access to the PWLB. However, the financial strength of the individual authority and borrowing purpose will be scrutinised by commercial lenders

### **3. Treasury and prudential indicators**

- 3.1 The Local Government Act 2003 requires local authorities to have regard to the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code) when determining how much money it can afford to borrow. The objectives of the

Prudential Code are to ensure, within a clear framework, that the capital investment plans of local authorities are affordable, prudent and sustainable, and that treasury decisions are taken in accordance with good professional practice. To demonstrate the Council has fulfilled these objectives, the Prudential Code sets various indicators that must be set and monitored each year.

- 3.2 The CFO confirms that we have complied with our prudential indicators for 2020-21, which were approved in February 2020 as part of the treasury management strategy statement. The CFO also confirms that we have complied with our treasury management policy statement and treasury management practices during 2020-21.

### Balance sheet and treasury position prudential indicator

- 3.3 The capital financing requirement (CFR) measures the council's underlying need to borrow for a capital purpose. Over the medium-term, borrowing must be only for a capital purpose, although in the short-term, we can borrow for cash flow purposes, which does not affect the CFR.
- 3.4 The council's CFR for 2020-21 is shown in the following table

Capital Financing Requirement	2020-21 Approved Estimate £000	2020-21 Revised Estimate £000	2020-21 Actual £000
<b>HRA</b>			
Opening balance (01 Apr 20)	207,024	207,024	197,024
Movement in year: Unfinanced cap exp	10,000	10,000	2,180
<b>Closing balance (31 Mar 21)</b>	<b>217,024</b>	<b>217,024</b>	<b>199,204</b>
<b>General Fund</b>			
Opening balance (01 Apr 20)	130,464	105,100	106,939
Movement in year: Unfinanced cap exp	78,285	60,270	11,000
Movement in year: MRP	(1,640)	(1,640)	(1,288)
<b>Closing balance (31 Mar 21)</b>	<b>207,109</b>	<b>163,730</b>	<b>116,651</b>
<b>Total</b>			
Opening balance (01 Apr 20)	337,488	312,124	303,963
Movement in year: Unfinanced cap exp	88,285	70,270	13,180
Movement in year: MRP	(1,640)	(1,640)	(1,288)
<b>Closing balance (31 Mar 21)</b>	<b>424,133</b>	<b>380,754</b>	<b>315,855</b>
Balances and Reserves	(188,850)	(188,850)	(133,189)
<b>Cumulative net borrowing requirement / (investments)</b>	<b>235,283</b>	<b>191,904</b>	<b>182,666</b>

- 3.5 The GF unfinanced capital expenditure mainly relates to WUV and loan / equity to North Downs housing. This is lower than budgeted because of the slippage in the capital programme – we projected some slippage during the year, which is shown by the revised estimate (as in the strategy report presented to Council in February 2021).

- 3.6 We budgeted an underlying need to borrow of £42.8 million for 2020-21, and our actual underlying need to borrow was £13.1 million because of slippage in the capital programme and also a higher amount of capital receipts than anticipated.
- 3.7 We also appropriated the remaining 2/3 of land from the GF to the HRA for the Guildford Park Car Park project which has led to an increase in the HRA CFR and a reduction in the GF CFR. This land appropriation cannot be used against the 141 Right to Buy scheme.

### Gross debt and the CFR

- 3.8 We monitor the CFR to gross debt continuously to ensure that, over the medium term, borrowing is only for a capital purpose and does not exceed the CFR. This is a key indicator of prudence. We will report any deviations to the CFO for investigation and appropriate action. The following table shows the council is in a net internal borrowing position and gross debt does not exceed the CFR over the period.

<b>Gross Debt and the CFR</b>	<b>2020-21 Actual £000</b>
General Fund CFR	116,651
HRA CFR	199,204
<b>Total CFR (at 31 March)</b>	<b>315,855</b>
Gross External Borrowing	(310,935)
<b>Net (external) / internal borrowing position</b>	<b>4,920</b>

- 3.9 Actual debt levels are monitored against the operational boundary and authorised limit for external debt, detailed in paragraph 3.20 to 3.25.
- 3.10 We are showing as being internally borrowed up to £5 million in at the end of March 2021.

### Capital expenditure prudential indicator

- 3.11 This indicator is set to ensure that the level of proposed capital expenditure remains within sustainable limits, and, in particular, to consider the impact on council tax or housing rent levels for the HRA.
- 3.12 The following table shows capital expenditure in the year, compared to the original estimate approved by the Executive in January 2020.



<b>Projects</b>	<b>Original Estimate (£'000)</b>	<b>Actual (£'000)</b>	<b>Variance (£'000)</b>
<u>Housing Revenue Account</u>			
HRA Capital Programme	27,387	12,685	(14,702)
<b>Total Housing</b>	<b>27,387</b>	<b>12,685</b>	<b>(14,702)</b>
<u>General Fund</u>			
Vehicles purchase	4,220	3,144	(1,076)
Museum project	1,020	0	(1,020)
Town centre gateway regeneration	3,480	0	(3,480)
SMC	2,975	374	(2,601)
A331 hotspots	3,146	82	(3,064)
Ash road bridge & Foorbridge	21,154	1,006	(20,148)
NDH/GHL	7,500	4,932	(2,568)
Midleton redevelopment	5,500	3,424	(2,076)
Strategic property	20,000	1,285	(18,715)
WUV	860	11,450	10,590
Provisional schemes	83,301	0	(83,301)
Other General Fund Projects	18,372	3,744	(14,628)
<b>Total General Fund</b>	<b>171,528</b>	<b>29,440</b>	<b>(142,088)</b>
<b>Total Capital Programme</b>	<b>198,915</b>	<b>42,125</b>	<b>(156,790)</b>

3.13 The table shows that there was a lot of slippage in the capital programme. This was mainly over a few larger schemes including:

- provisional schemes were re-profiled during the year, and include:
  - various transport schemes
  - ash road bridge
  - Guildford park car park
  - Midleton redevelopment

3.14 The following table shows the financing of capital expenditure in the year, compared with the original approved estimate.

<b>CAPITAL EXPENDITURE - SUMMARY</b>	<b>Original Estimate (£'000)</b>	<b>Actual (£'000)</b>
<b>General Fund Capital Expenditure</b>		
- Main programme	166,719	26,951
- Reserve & s106 Capital Schemes	3,984	1,730
- General Fund Housing	825	759
<b>HRA Capital expenditure</b>		
- Main programme	27,387	12,685
<b>Total Capital Expenditure</b>	<b>198,915</b>	<b>42,125</b>
<b>CAPITAL EXPENDITURE - SUMMARY</b>	<b>Original Estimate (£'000)</b>	<b>Actual (£'000)</b>
<b>General Fund Capital Expenditure Financed by:</b>		
- Borrowing/Use of Balances	(118,907)	(13,053)
- Capital Receipts	0	(6,295)
- Capital Grants/Contributions	(41,368)	(7,070)
- Capital Reserves/Revenue	(11,253)	(3,022)
<b>HRA Capital Expenditure Financed by:</b>		
- Capital Receipts	(6,783)	(2,607)
- Capital Reserves/Revenue	(20,604)	(8,479)
<b>Financing - Totals</b>	<b>(198,915)</b>	<b>(42,125)</b>

- 3.15 GF borrowing was less than budgeted because of slippage in the capital programme, and an increase in the opening of available capital resources which reduced the need for internal borrowing in the year.

#### **Ratio of financing costs to the net revenue stream prudential indicator**

- 3.16 This is an indicator of affordability and highlights the revenue impact of capital expenditure by identifying the proportion of the revenue budget required to meet the financing costs associated with capital spending. Financing costs include interest on borrowing, MRP, premium or discount on loans repaid early, investment income and depreciation where it is a real charge.
- 3.17 Depreciation is not a real charge to the GF but has been to the HRA since April 2012.
- 3.18 The ratio is based on costs net of investment income.
- 3.19 The net revenue stream for the GF is the total budget requirement and for the HRA is total income. Where the figure is negative, it is because there is a net investment position (more investments than debt). The total budget requirement for the GF used is the 2020-21 budget.

	<b>2020-21 Original Estimate</b>	<b>2020-21 Actual</b>
General Fund	10.61%	-8.20%
HRA	33.09%	33.52%

- 3.20 The figure for the GF is negative because interest received is higher than financing costs (interest payable, debt management costs and MRP). The budget assumed a

large amount of external borrowing for the capital programme which was not required and was reported throughout the year as part of budget monitoring.

### **The authorised limit prudential indicator**

- 3.21 The Local Government Act 2003 requires the council to set an affordable borrowing limit, irrespective of the indebted status. This is a statutory limit, which we cannot breach.
- 3.22 The limit is the maximum amount of external debt we can legally owe at any one time. It is expressed gross of investments and includes capital expenditure plans, the CFR and cash flow expenditure. It also provides headroom over and above for unexpected cash movements.
- 3.23 The limit was set at £531 million for the year and the highest level of debt was £311 million.
- 3.24 We measure the levels of debt on an ongoing basis during the year for compliance. The CFO confirms there were no breaches to the authorised limit in 2020-21.

### **The operational boundary prudential indicator**

- 3.25 The operational boundary, based on the same estimates as the authorised limit, reflects the most likely, prudent but not worst case scenario. It does not allow for additional headroom included in the authorised limit.
- 3.26 The limit was set at £577 million for the year and the highest level of debt was £311 million.

### **Maturity structure of fixed rate borrowing treasury indicator**

- 3.27 The aim of this indicator is to control our exposure to refinancing risk (large concentrations of fixed rate debt needing refinancing at once). We calculate this as the amount of fixed rate borrowing maturing in each period as a percentage of fixed rate borrowing.

	<b>Upper Limit</b>	<b>Lower Limit</b>	<b>Actual at 31 March 2021</b>	<b>Value of loans maturing</b>
Under 12 months	15%	0%	44.56%	118,500,000
1-2 years	20%	0%	0.00%	0
3 to 5 years	25%	0%	3.76%	10,000,000
6 to 10 years	50%	0%	20.68%	55,000,000
11-15 years	100%	0%	9.40%	25,000,000
16-20 years	100%	0%	9.40%	25,000,000
21-25 years	100%	0%	12.20%	32,435,000
Over 26 years	100%	0%	0.00%	0

- 3.28 The above table shows the amount of debt maturing in each period and its percentage of total fixed rate loans. The targets were set to give us flexibility for drawing down new loans on a fixed or variable rate basis. If a lower upper limit for fixed rate debt were set, the council would be giving itself a greater exposure to interest rate changes by having more variable rate debt. The upper limit for under 12

months was set to cover any short-term borrowing for cash flow purposes and for allowing for the principal loan repayments falling in that period.

- 3.29 The limit for that maturing within 12 months is higher due to short-term borrowing levels. 69% of our fixed rate debt matures within the next 10 years, with the majority of long-term loans being in years 6-10. This gives the council stability in its interest payments over that time, and time to consider refinancing options. The first fixed rate loan matures in 2024.

#### **Actual external debt treasury indicator**

- 3.30 This indicator comes directly from our balance sheet. It is the closing balance for actual gross borrowing (short and long term) plus other deferred liabilities. It is measured in a manner consistent for comparison with the authorised limit and operational boundary.

- 3.31 Actual external debt (as per 3.7) stood at £311 million.

#### **Upper limit for total principal sums invested over 1 year**

- 3.32 The purpose of this limit is to contain exposure to the possibility of loss that may arise as a result of the council having to seek early repayment of the sums invested.

- 3.33 Our limit was set at £50 million, we ended the year with exposure of £35 million.

- 3.34 As mentioned earlier in the report, many of our long-term investments are covered bonds, which can be sold on the secondary market. There could be a price differential if they were sold, but it is unlikely to be material.