



Cabinet Agenda

Wyre Borough Council
Date of Publication: 15 March 2022
Please ask for : Duncan Jowitt
Democratic Services Officer
Tel: 01253 887608

**Cabinet meeting on Wednesday, 23 March 2022 at 5.00 pm
in the Council Chamber, Civic Centre, Poulton-Le-Fylde**

1. Apologies for absence

2. Declarations of interest

Members will disclose any pecuniary and any other significant interests they may have in relation to the matters to be considered at this meeting.

3. Confirmation of minutes

(Pages 3 - 8)

To confirm as a correct record the minutes of the previous meeting of Cabinet.

4. Public questions

To receive and respond to any questions from members of the public.

Public questions for Cabinet may be submitted at any time by writing to Democratic Services or via email democratic.services@wyre.gov.uk.

Public questions for this meeting must be received by noon on the Thursday before the meeting is held and do not need to specifically relate to items on this agenda. Questioners should provide their name and address and indicate to which Cabinet member the question is to be directed.

The total period of time allocated for public questions will not normally exceed 30 minutes.

5. District Enforcement Pilot Task Group - Final Report

(Pages 9 - 96)

Report of the Corporate Director Environment and the Chair of the District Enforcement Pilot Task Group.

6. Treasury Management Policy Statement and Practices, Treasury Management and Annual Investment Strategy, Minimum Revenue Provision Policy Statement and Capital Strategy 2022/23

(Pages 97 -
186)

Report of the Resources Portfolio Holder and Corporate Director Resources.



Cabinet Minutes

The minutes of the Cabinet meeting of Wyre Borough Council held on Wednesday, 16 February 2022 in the Council Chamber, Civic Centre, Poulton-Le-Fylde.

Cabinet members present:

Councillor David Henderson, Leader of the Council
Councillor Roger Berry, Neighbourhood Services and Community Safety Portfolio Holder
Councillor Lynne Bowen, Leisure, Health and Community Engagement Portfolio Holder
Councillor Simon Bridge JP, Street Scene, Parks and Open Spaces Portfolio Holder
Councillor Alice Collinson, Planning Policy and Economic Development Portfolio Holder
Councillor Michael Vincent, Deputy Leader and Resources Portfolio Holder

Apologies for absence:

None.

Other councillors present:

Councillors Sir R Atkins, Fail and Le Marinel

Officers present:

Garry Payne, Chief Executive
Mark Billington, Corporate Director Environment
Marianne Hesketh, Corporate Director Communities
Clare James, Corporate Director Resources and Section 151 Officer
Veronica Wilson, Head of Finance
Duncan Jowitt, Democratic Services Officer

No members of the public or press attended the meeting.

CAB.29 Declarations of interest

None.

CAB.30 Confirmation of minutes

The minutes of the Cabinet meeting of 12 January 2022 were approved as a correct record.

CAB.31 Public questions

None.

CAB.32 Revenue Budget, Council Tax and Capital Estimates (annual report)

The Resources Portfolio Holder and Corporate Director Resources (S.151 Officer) submitted a report asking Cabinet for confirmation of the Revenue Budget, Council Tax, Revised Capital Budget 2021/22 and Capital Programme 2022/23 onwards. Councillor Michael Vincent expressed his thanks to Clare James, Veronica Wilson and her team who, he said, had been as thorough as ever.

Decisions

Cabinet agreed

1. That the following be approved and recommended to Council for their approval:-
 - a. The Revised Revenue Budget for the year 2021/22 and the Revenue Budget for 2022/23.
 - b. For the purpose of proposing an indicative Council Tax for 2023/24, 2024/25, 2025/26 and 2026/27 taking into account the Medium Term Financial Plan at Appendix 2 which reflects an increase of £5 each year, any increase will remain within the principles determined by the Government as part of the legislation relating to Local Referendums allowing the veto of excessive Council Tax increases.
 - c. Members' continuing commitment to the approach being taken regarding the efficiency savings, detailed within the council's 'Annual Efficiency Statement' at Appendix 1 of the report.
 - d. Any increases in the base level of expenditure and further additional expenditure arising during 2022/23 should be financed from existing budgets or specified compensatory savings, in accordance with the Financial Regulations and Financial Procedure Rules.
 - e. The use of all other Reserves and Balances as indicated in Appendices 4 and 5 of the report.
 - f. The manpower estimates for 2022/23 in Appendix 4 of the report.
 - g. In accordance with the requirements of the Prudential Code for Capital Finance, those indicators included at Appendix 7 of the report.

- h.** The Revised Capital Budget for 2021/22 and the Capital Programme for 2022/23 onwards in Appendix 8 of the report.
- 2.** That it be noted that, in accordance with the Council's Scheme of Delegation, as agreed by Council at their meeting on 24 February 2005:

a. The amount of 38,004.46 had been calculated as the 2022/23 Council Tax Base for the whole area [(Item T in the formula in Section 31B of the Local Government Finance Act 1992, as amended (the "Act"))]; and

b. A Council Tax Base, for dwellings in those parts of its area to which a Parish precept relates, had been calculated as indicated below:

Barnacre-with-Bonds	1,094.95
Bleasdale	58.48
Cabus	621.79
Catterall	978.85
Claughton-on-Brock	407.50
Fleetwood	6,404.59
Forton	695.07
Garstang	1,838.05
Great Eccleston	743.21
Hambleton	1,067.66
Inskip-with-Sowerby	402.45
Kirkland	130.09
Myerscough and Bilsborrow	501.47
Nateby	209.65
Nether Wyresdale	329.09
Out Rawcliffe	265.30
Pilling	855.66
Preesall	1,900.70
Stalmine-with-Staynall	647.14
Upper Rawcliffe-with-Tarnacre	294.77
Winmarleigh	120.93

- 3.** That the Council Tax requirement for the council's own purposes for 2022/23 (excluding Parish precepts) be £8,161,078.

4. That the following amounts be calculated for the year 2022/23 in accordance with Sections 31 to 36 of the Act:-

a.	£71,386,560	Being the aggregate of the amounts which the council estimates for the items set out in Section 31A(2) of the Act taking into account all precepts issued to it by Parish Councils.
b.	£62,361,311	Being the aggregate of the amounts which the council estimates for the items set out in Section 31A(3) of the Act.
c.	£9,025,249	Being the amount by which the aggregate at 3.4(a) above exceeds the aggregate at 3.4(b) above, calculated by the council, in accordance with Section 31A(4) of the Act, as its Council Tax requirement for the year. (Item R in the formula in Section 31B of the Act).
d.	£237.48	Being the amount at 3.4(c) above (Item R) all divided by Item T (3.2(a) above), calculated by the council, in accordance with Section 31B of the Act, as the basic amount of its Council Tax for the year (including Parish precepts).
e.	£864,171	Being the aggregate amount of all special items (Parish precepts) referred to in Section 34(1) of the Act and as detailed in Appendix 6.
f.	£214.74	Being the amount at 3.4(d) above less the result given by dividing the amount at 3.4(e) above by Item T (3.2(a) above), calculated by the council, in accordance with Section 34(2) of the Act, as the basic amount of its Council Tax for the year for dwellings in those parts of its area to which no Parish precept relates.

5. That the council's basic amount of Council Tax for 2022/23 was not considered excessive in accordance with principles approved under Section 52ZB of the Local Government Finance Act 1992.

CAB.33 Exclusion of public and press

The Chief Executive had determined that in accordance with Paragraph 11 of the Access to Information Rules in Part 4 of the Council's Constitution, the report submitted under item 7 of this agenda was "Not for Publication" because it referred to "exempt information" as defined in Part 1 of Schedule 12A(3) of the Local Government Act, 1972 as amended by the Local Government (Access to Information) Variation Order 2006, on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information).

Decision

Cabinet agreed that the public and press be excluded from the meeting whilst agenda item 7 was being considered, as it referred to exempt information as defined in category 3 (Information relating to the financial or business affairs of any particular person (including the authority holding that information)) of Part 1 of Schedule 12(a) of the Local Government Act, 1972, as amended by the Local Government (Access to Information) Variation Order 2006 and the public interest in maintaining the exemption outweighed the public interest in disclosing the information.

CAB.34 Disposal of Land at Bourne Hill, Thornton

The Resources Portfolio Holder and Corporate Director Resources submitted a report seeking Cabinet approval to agree the terms of disposal for land at Bourne Hill, Thornton previously declared surplus.

Decision

Cabinet agreed that, following satisfactory ground investigations, approval be given to enter into a contract to dispose of the freehold land and for the Corporate Director Resources to have delegated authority to deal with minor encroachment issues outside of the disposal process.

The meeting started at 5.00 pm and finished at 5.24 pm.

Date of Publication: 17 February 2022

Options considered but rejected

Any alternative options that were considered but rejected, in addition to the reasons for the recommendations that were made, are included in the full reports.

When will these decisions be implemented?

All decisions will be put into effect five working days from the date of publication, unless a decision is "called-in" by any four members of the council within that period.

This page is intentionally left blank



Report of:	Meeting	Date
Mark Billington, Corporate Director Environment and Councillor Tom Ingham, Chair of the District Enforcement Pilot Task Group	Cabinet	23 March 2022

District Enforcement Pilot Task Group – Final Report

1. Purpose of report

1.1 To report the work of the District Enforcement Pilot Task Group to the Cabinet.

2. Outcomes

2.1 Evaluate the effectiveness of the environmental enforcement pilot to tackle cleaner and greener issues.

3. Recommendations

That Cabinet considers the report and recommendations (attached in Appendix 1) arising from the review of the District Enforcement Pilot Task Group which are as follows:

3.1 That the current agreement with District Enforcement is extended for a further two years, for example from March 2022 to March 2024, with the intention for an additional Overview and Scrutiny review of the service within this two-year period.

3.2 That there is the provision for District Enforcement to issue an official warning system, in addition to fines, for the following offences:

- Failing to have the means to pick-up dog fouling
- Dogs entering an exclusion zone
- Dogs not on leads in Public Places

To facilitate this, the group recommends that an update to the IT system be implemented to allow warnings to be lodged electronically.

- 3.3 That Wyre should strongly consider taking action against under 18 year olds and that officers could explore the options for penalties. However, the task group would recommend looking at options such as letters sent to parents and/or verbal, unofficial warnings.
- 3.4 That the council continue to support and endorse their current programme for educating young people of the borough on the harmful impact of littering.
- 3.5 That Wyre Council's communications team should send out more messages to residents regarding the reporting of dog fouling incidents.

4. Background

- 4.1 Wyre Council first introduced the pilot scheme with District Enforcement on 5 September 2018, it was agreed that the council would enter a 12-month environmental enforcement trial with District Enforcement. The agreement was then extended on 12 March 2021 for another year (until March 2022).
- 4.2 A task group to review the pilot scheme was originally commissioned at the Overview and Scrutiny Committee meeting held on Monday 22 July 2019.
- 4.3 Owing to the unforeseen circumstances, created by the Covid-19 pandemic and subsequent lockdowns, the work on this review was halted since early March 2020. The Overview and Scrutiny Committee at their 19 July 2021 meeting decided to recommission the District Enforcement Pilot Task Group. The first meeting back was held on 25 August 2021.
- 4.4 The task group's aims were (as per the scoping document):
 - 1. Evaluate the effectiveness of the environmental enforcement pilot;
 - 2. Make recommendations regarding future service provision;
 - 3. Consider opportunities to expand on the offences covered by the pilot within any future services;
 - 4. Review the council's approach for under 18's (currently the council policy is not to issue Fixed Penalty Notices to under 18 year olds; the task group could look at the issues related to reducing the age limit or consider other means of addressing littering / environmental offences by minors).
- 4.5 The review was carried out over seven meetings held on 14 October 2019, 4 November 2019, 25 November 2019, 19 February 2020, 25 August 2021, 9 November 2021 and 6 December 2021. The review group heard evidence from the following expert advisors:
 - Councillor Simon Bridge, Street Scene, Parks and Open Spaces Portfolio
 - Mark Billington, Corporate Director Environment

- Ruth Hunter, Head of Public Realm and Sustainability
- Alan Fitzpatrick, Waste, Recycling and Environmental Enforcement Manager
- Warren Hodgson, Head of Environmental Enforcement Manager
- Clare James, Corporate Director Resources

4.6 The task group consulted with Parish and Town Councils across the borough regarding the service. Members received responses from Catteral, Garstang, Inskip-with-Sowerby, Pilling, Preesall and Winmarleigh Parish and Town Councils. They additionally received information from other surrounding Local Authorities and from the CIPFA family group on how environmental crime was enforced at their authority. The group also produced an online public consultation in order to understand the views of Wyre residents of the scheme.

5. Key issues and proposals

5.1 Following all the relevant information that was gathered by the group, it was clear to members that protecting and enhancing the quality of Wyre's neighbourhoods was an integral priority of the council. An effective enforcement service was a vital deterrent that helped deliver this priority. Therefore, the group's recommendations aimed to assist the council with this.

5.2 The group understood that the pandemic and subsequent lockdowns had caused an impact on the performance figures of the service; therefore, the agreement required additional time to fully understand how it performs. They concluded that the council should support the service provided by District Enforcement for a further two years, for example from March 2022 to March 2024, and for a further Overview and Scrutiny review to assess performance.

5.3 The group believed that the service should have the provision to hand out verbal warnings as well as FPN's for the following offences only:

- Failing to have the means to pick-up dog fouling
- Dogs entering an exclusion zone
- Dogs not on leads in Public Places

5.4 This would be at the judgement of the authorised officer whether they see fit to give a fine or a warning. They should weigh up the nature and seriousness of the offence before issuing the appropriate sanction. The group valued that residents of the borough would appreciate an initial warning if this is their first offence or if they genuinely did not realise that it was an enforceable offence. The group additionally concluded that for initial warnings to be given out there needs to be an upgrade to the IT system used by enforcement officers to log these incidents.

5.5 They were adamant that verbal warnings would not be offered for offences such as littering and dog fouling; these offences would only be enforceable by FPNs.

- 5.6** It was clear that penalties for minors was a delicate matter, with this in mind, the group believed that the council should be taking actions against under 18 year olds in order to ensure their actions have minimal impact on the wider community. The group believed that options for the council to explore should be either a letter sent to parents and/or a verbal, unofficial warning. Additionally, the group believed that the council should explore the appropriate age range for enforcement of under 18s.
- 5.7** The task group highlighted the importance of educating young people on the harmful impacts of littering. They understood that Wyre currently has a Cleaner Greener Project Officer who focuses on recycling and the effects of littering, and talks at schools and community groups on request. This should be fully endorsed by the council and sufficient resources must be made available.
- 5.8** The group concluded that there were advantages of more residents being aware of procedures for reporting incidents on the council's website and this could be achieved by Wyre's Communications team sending out additional messages on social media platforms, for example. This will help patrol officers monitor the situation.
- 5.9** During the review, the group gained a better understanding of the harmful impact of littering on the environment and health, particularly with the rising issue of Climate Change. They additionally understood the difficulties regarding the enforcement of these offences. Therefore, they believed it is vital that the council consider lobbying partners such as the Local Government Association (LGA) to lobby the government on the tightening of littering legislation to allow for more enforcement powers for local authorities.
- 5.10** In addition, the group highlighted the lack of signage specifically regarding dog fouling and dogs on leads zones, particularly in some areas in Poulton-le-Fylde. They believed that the council should review and update their signage across the borough. Even though the group did not wish to put this forward as a recommendation, they wanted their concerns noted in the report.

Financial and legal implications	
Finance	There are no direct financial implications arising out of this report. However, it is noted that several recommendations including an upgrade to an IT system are likely to have associated costs not specified in the report.
Legal	There are no direct legal implications arising out of this report. However, it is noted that several recommendations including an extension of the agreement will require approval from the relevant Portfolio Holder.

Other risks/implications: checklist

If there are significant implications arising from this report on any issues marked with a ✓ below, the report author will have consulted with the appropriate specialist officers on those implications and addressed them in the body of the report. There are no significant implications arising directly from this report, for those issues marked with a x.

risks/implications	✓ / x
community safety	x
equality and diversity	x
sustainability	x
health and safety	x

risks/implications	✓ / x
asset management	x
climate change	x
ICT	x
data protection	x

Processing Personal Data

In addition to considering data protection along with the other risks/ implications, the report author will need to decide if a 'privacy impact assessment (PIA)' is also required. If the decision(s) recommended in this report will result in the collection and processing of personal data for the first time (i.e. purchase of a new system, a new working arrangement with a third party) a PIA will need to have been completed and signed off by Data Protection Officer before the decision is taken in compliance with the Data Protection Act 2018.

report author	telephone no.	email	date
Marianne Unwin	01253 887326	Marianne.unwin@wyre.gov.uk	18/01/2022

List of background papers:		
name of document	date	where available for inspection
None		

List of appendices

Appendix 1 – District Enforcement Pilot Task Group report – Final.

This page is intentionally left blank



District Enforcement Pilot Scheme Task Group

Final Report

Chairman:

Councillor Tom Ingham

Task Group Members:

Councillor Ian Amos
Councillor Rita Amos
Councillor Lady Dulcie Atkins
Councillor Emma Ellison
Councillor Rob Fail
Councillor Colette Fairbanks
Councillor David O'Neill
Councillor Phil Orme
Councillor Mary Stirzaker
Councillor Holly Swales
Councillor Lynn Walmsley

**Overview & Scrutiny Committee
Chairman: Councillor John Ibison**

• Introduction	Page 3
• Aims of review	Page 4
• The review process	Page 4
• Summary of evidence provided by Councillor Simon Bridge, Street Scene, Parks and Open Spaces Portfolio Holder and Mark Billington, Corporate Director Environment.	Page 5
• Summary of evidence provided by Ruth Hunter, Head of Public Realm and Sustainability and Alan Fitzpatrick, Waste, Recycling and Environmental Enforcement Manager	Page 6 - 13
• Summary of evidence provided by Warren Hodgson, Head of Environmental Crime Division at District Environmental Enforcement and Alan Fitzpatrick, Waste, Recycling and Environmental Enforcement Manager	Page 14 - 17
• Summary of evidence from Town and Parish Councils	Page 18
• Summary of evidence from the public online consultation responses	Page 19 - 20
• Summary of evidence provided by Clare James, Corporate Director Resources	Page 21
• Summary of evidence from other Local Authorities	Page 22
• Conclusions and recommendations	Page 23 - 25
• Councillors' attendances	Page 26
• List of appendices	Page 27
• Appendices	Page 28

Introduction

Wyre Council first introduced the pilot scheme with District Enforcement on 5 September 2018, it was agreed that the council would enter a 12-month environmental enforcement trial with District Enforcement. The agreement was then extended the on 12 March 2021 for another year (until March 2022) to allow further consideration of data covering a greater period and to enable the findings of the Overview and Scrutiny Committee to be considered along with the Life In Wyre Survey – both of which had been delayed. To enable these factors to be considered whilst maintaining the service; it was felt a further extension was appropriate.

The current pilot agreement involves District Enforcement undertaking specialist enforcement services to address environmental crime issues such as dog fouling, littering and other dog control measures under the Public Space Protection Orders on behalf of Wyre Council.

There was a suspension of District Enforcement between March 2020 and July 2020 during the first Covid-19 lockdown. However, Wyre had been in a high alert level and Lancashire being in Tier 3 for a considerably longer period. Therefore, District personnel have more recently been utilised to support the council to help people have confidence to get back to supporting their local high street shops. They have also been deployed to provide guidance to businesses as part of new Covid-19 Marshalling duties through a separate arrangement.

A task group to review the pilot scheme was originally commissioned at the Overview and Scrutiny Committee meeting held on Monday 22 July 2019. Due to the unforeseen circumstances, created by the Covid-19 pandemic and subsequent lockdowns, the work on this review was halted since early March 2020. The Overview and Scrutiny Committee at their 19 July 2021 meeting decided to recommission the District Enforcement Pilot Task Group. The first meeting back was held on 25 August 2021.

This report includes a summary of evidence from before and after the pause of the review. The evidence included in this report has been analysed to formulate conclusions and recommendations.

The Overview and Scrutiny Committee was aware from the outset that other discussions regarding the scheme were on going at officer and Portfolio Holder level, but it remained the role of the committee and any task group commissioned, to scrutinise the pilot scheme and to review and comment on any future decisions on an extension on the current agreement.

Aims of review

The aims of the review, as specified in the scoping document (see Appendix A), are as follows:

1. Evaluate the effectiveness of the environmental enforcement pilot
2. Make recommendations regarding future service provision
3. Consider opportunities to expand on the offences covered by the pilot within any future services
4. Review the council's approach for under 18's (currently the council policy is not to issue Fixed Penalty Notices to under 18 year olds; the task group could look at the issues related to reducing the age limit or consider other means of addressing littering / environmental offences by minors)

The review process

The task group held its first meeting and invited Councillor Simon Bridge, the Street Scene and Open Spaces Portfolio Holder, and Mark Billington, Corporate Director Communities to set the context within which the scrutiny review would take place. The group also received a report from Ruth Hunter, Head of Public Realm and Environmental Sustainability and interviewed Alan Fitzpatrick, Waste, Recycling and Environment Enforcement Manager. Alan Fitzpatrick also attended the groups second and fifth meeting. The group also interviewed Warren Hodgson, Head of Environmental Crime Division at District Environmental Enforcement.

Several questions about the District Enforcement service were put to Town and Parish Councils. The group received responses from Catterall, Garstang, Inskip-with-Sowerby, Pilling, Preesall and Winmarleigh. In addition to this, members commissioned an online public consultation for residents. The members of the group and the Democratic Services Officer distributed the online version of the survey.

Clare James, Corporate Director Resources (Section 151 Officer) provided the group with a report detailing a draft costing for bringing the environmental enforcement scheme in-house.

Members questioned how other local and similar authorities dealt with environmental enforcement; they received several responses from other Lancashire authorities and CIPFA family group authorities.

The task group would like to thank all of the expert advisors who attended a meeting or assisted them with their work.

Summary of evidence provided by Councillor Simon Bridge, Street Scene, Parks and Open Spaces Portfolio Holder and Mark Billington, Corporate Director Environment.

The Street Scene, Parks & Open Spaces Portfolio Holder, Councillor Simon Bridge, and the Corporate Director Environment, Mark Billington, attended the first meeting.

They provided background information on the District Enforcement pilot scheme and the questions relating to it.

Councillor Bridge invited the task group's input and valued their suggestions.

The pilot scheme had been extended by a further six months and that this was to ensure sufficient time for the Task Group to scrutinise the scheme. The exact date was unknown, however the pilot scheme was due to expire but that it was in April 2020.

There was discussion around:

- Public Space Protection Orders
- The act of littering
- The ability to patrol private land in the borough
- Educating the public and public perceptions of litter
- The amount of officers used in the pilot scheme
- If there was an issue of insufficient signage
- Fines for under eighteen year olds

The financial benefits of the scheme were addressed and questions were raised regarding the finances of District Enforcement and the possibility to view these. The council does not have a contractual agreement with District and there would be no obligation for them to provide this information to the task group.

Wyre Council received 12.5% from all FPNs (Fixed Penalty Notices) issued. The council is effectively getting a free service, with the added benefit of improving the environment.

The judgement of the scheme should mainly be focused on performance and not financial benefits. Wyre does not look at the scheme primarily for the finances but as an opportunity to keep the streets of the borough clean.

Both guests concluded stating their delight with the scheme and the impact it had created.

Summary of evidence provided by Ruth Hunter, Head of Public Realm and Sustainability and Alan Fitzpatrick, Waste, Recycling and Environmental Enforcement Manager

The Head of Public Realm and Sustainability, Ruth Hunter, attended the group's second meeting and submitted a detailed report providing precise information in relation to the pilot project working with District Enforcement to tackle a range of environmental offences.

The report is attached at Appendix B.

The Waste, Recycling and Environmental Enforcement Manager, Alan Fitzpatrick, also attended the second meeting to respond to questions that had been raised by task group members before the meeting.

Q1) How many officers are involved in the pilot scheme?

There are 6 Operational Officers involved in the Pilot Scheme, which consist of 2 Static Officers (based fulltime in Wyre) working throughout Wyre Monday-Thursday, and up to 4 Mobile Officers who work Friday, Saturday & Sunday (usually 2).

Q2) Is there a list of offences enforced by District Enforcement?

In real terms the offences District Enforcement cover, are those contained within the: Anti-Social Behaviour, Crime and Policing Act 2014:

- failing to put a dog on a lead when directed to do so by an authorised officer - this allows council officers to direct that a dog is put on a lead when it is causing nuisance and/or danger to other persons and their dogs
- failing to pick up after your dog
- failing to exclude dogs from designated areas
- failing to keep dogs on leads in the designated dogs on leads areas (e.g. children's play areas)
- failing to provide at the request of an authorised officer the means to pick up after a dog Section 87 Environmental Protection Act 1990
- littering offences

Q3) What are the officer procedure rules that must be followed (including fining, appeals, and court)?

They do allow an appeals process even though accepting a Financial Penalty Notice (FPN) is acceptance of the offence, discharging liability to go to court. If there is no body-cam footage, we rescind the FPN automatically, on appeal.

Q4) What is the exact expiry date of the pilot scheme?

There was not an exact date, but it will come to a conclusion at the beginning of May 2020.

Q5) How many FPN's (Financial Penalty Notice) have been issued to disabled individuals (maybe through up to date figures for the whole of the pilot broken down by category (e.g. dogs) and sub category (e.g. inability to pick up, fouling, not on lead), and also broken down by age bands, and area)?

This information is not captured. However, should anyone make representation on the grounds of a disability, it is considered on a case-by-case basis.

If when approached an individual has a visible disability preventing them from retrieving dog fouling, they would be considered an exempt and will not be issued with a FPN, but may be issued with an advisory warning or a verbal explanation of what they should/shouldn't be doing to ensure their actions have minimal impact on the wider community.

If there are no obvious signs of disability, but during the course of the interaction an individual suggests they have a disability which prevents them picking-up, then the Enforcement Officer will advise them to make contact and provide evidence of their condition (from a medical professional), as an Enforcement Officer on the ground has to be consistent and be seen to treating all individuals in the same manner.

For example, somebody in a wheeled chair would be exempt from picking up their dog foul, but not necessarily from littering.

A hearing disability does not prevent foul from being picked up or litter placed in a bin or pocket to take home.

Q6) This is pilot scheme is for 18 months; would you please clarify the options after the scheme?

The options available to Wyre after the pilot scheme has come to an end, are:

- Procure a new provider/partner to undertake Environmental Enforcement on behalf of Wyre under the same terms and conditions (cost)
- Procure a new provider/partner with changes to the current conditions of the agreement (e.g. pay hourly rate, pay provider for each FPN issued, 50%-50% profit split which carries a proportion of the cost)
- Bring the Environmental Enforcement Service in-house and merge it with current Enforcement Officers (considerable investment would be required)
- Cessation of Service

Ultimately, it would be for members to consider any alternatives.

Q7) Has the council considered bringing this service back in house? What would be the advantages and disadvantages of doing so?

It would be a decision for members to consider any alternatives.

Issues include:

- i. Recruitment – it would be very difficult indeed to recruit locally as officers are often the subject of extreme abuse from members of the public. It is greatly advantageous that officers are brought in from outside the area.
- ii. None of the FPN's issued previously by in house staff – people who live locally often do not challenge properly as they might meet the offender again.
- iii. Payment systems/case handling – cost of purchase, setting up and implementation.
- iv. Technology – capital expenditure and on-going revenue costs.

Q8) What happens to the litter after a fine is issued?

There is no legislation in-place to force an offender to pick the litter up, so it remains on the floor unless the Enforcement Officer decides to pick it up and place it in a nearby bin.

Q9) How many appeals have been submitted? How many have been successful and how many have been unsuccessful?

A total of 536 Representations (appeals) had been submitted over the last year 144 accepted (FPN rescinded) – 27%, 392 declined – 73%

Q10) How many fines have been left unpaid?

Continued non-payment following 2 reminders being sent, resulted in a case file being produced for prosecution. The FPN was a means of an individual discharging their liability to attend court through the legal process.

An extended payment timeframe would be considered if an individual contacts District Enforcement on the grounds of financial issues.

As it was a live system, the position on payments changes all the time.

Q11) Has there ever been a need for the Regulation of Investigatory Powers Act 2000 (RIPA) regulations to be used? Would there ever be a need for this to be used?

No, RIPA was used for covert surveillance, and undertaking uniformed high profile patrols did not require RIPA to be introduced.

Q12) Have cases increased and is Wyre coping well with the situation now?

In relation to court cases, and in real terms, yes, the workload had increased, but since the introduction of the Single Justice System (SJS) the workload had decreased from its original level, and there had equally been a reduction in the number of appeals dealt with.

Q13) Could the task group view a selection of notices and stock letters to help provide a view on the appropriateness of the wording and whether the process is open and transparent?

Other than generic reminder letters for non-payment, they are quite personalised and are linked to a specific appeal case.

The process is clear and transparent. The appeal is made to District Enforcement in accordance with the DEFRA Code of Practice. He explained that people were permitted to view body-cam footage in a controlled environment with the Waste and Recycling Officer (or another suitable responsible officer) present.

Q14) Are there any instances of people accidentally littering being fined, or are District only dealing with deliberate littering? If accidental littering fines are being handed out, why is that the case?

No, which was predominantly due to the Enforcement Officers being well-trained and aware that a FPN can only be issued if someone “knowingly drops and leaves litter”, which is supported by the current appeals process Wyre has in place whereby it would be apparent that the alleged offender inadvertently dropped debris.

He explained that there were some erroneous myths in circulation that individuals have been issued an FPN when they have accidentally dropped litter, but in his experience, he had not come across a single case. If councillors had concerns about a specific case a request should be made to the Waste and Recycling Officer to review the body-cam footage.

Q15) Who is considering the appeals, Wyre officers or District? If a combination, what percentage by each and how is it determined who does a particular appeal?

District Enforcement always review an appeal in the first instance. The Waste and Recycling Officer would then review it further if necessary, after which the case can be considered by a court. In effect, this provides a three-stage appeal process. A Wyre Officer would always retain the judgement in a representation (appeal).

Q16) Do you consider the appeal process to be open and transparent or are improvements needed?

Improvements have been on-going throughout the pilot scheme (which was entered into so we could learn from it and adapt if/when necessary), and he suggested that there was very little (if anything) that could be introduced to improve the current process, particularly as they had introduced an appeals process to an area where the appeals process guidelines were to progress the matter directly to the Magistrates Court.

Q17) What constitutes littering (in regards to cigarettes) - ash, stub, or both?

What is described as the actual cigarette bud is the litter, which either has a filter-tip or was a hand rolled cigarette/cigar.

Q18) Could we have a report showing numbers of dog fouling incidents over the last 4 years (by year and ward)?

Please see the table provided, below.

4 Year Dog Fouling Details

	Pharos	Tithe barn	Mount	Hardhorn with Highcross	Breck	Cleveys Park	Jubilee	Preesall	Stanah
2019/20	12	6	12	12	12	2	10	5	13
2018/19	29	17	15	24	21	15	19	10	21
2017/18	22	31	37	17	30	18	10	11	14
2016/17	46	34	32	36	30	24	24	21	20

	Victoria & Norcross	Mars Mill	Rossall	Bourne	Warren	Garstang	Great Eccleston	Hambleton & Stalmine
2019/20	1	0	3	6	1	1	2	4
2018/19	2	26	67	41	10	5		14
2017/18	4	11	32	16	3	14	8	5
2016/17	20	19	15	13	13	12	12	12

	Park	Brock with Catterall	Carleton	Calder	Pilling	Pheasant's Wood	Wyresdale
2019/20	5	1	1	1			
2018/19	13	9	10	3	5	1	4
2017/18	8	7	3	4	4	1	
2016/17	9	9	8	4	3		1

Total Number of Dog Fouls

Year	Dog Foul Incidents	FPN's Issued
2019/20	110	55
2018/19	381	42
2017/18	310	4
2016/17	417	4

Q19) Has the threat of calling the police been used to obtain personal details? If so, what is the legal position on this and have the police ever attended?

Yes, the threat of calling the police had been used towards individuals under s88 Environmental Protection Act 1990, and yes, the Police had been called on several occasions and had assisted the Enforcement Officers in obtaining offenders details.

This is a process, which was also adopted by Wyre Enforcement Officers.

In response to additional comments and questions from councillors, Alan Fitzpatrick made the following comments:

- The legislation made it very clear that dog-walkers must have “the means to pick up after a dog” at all times.
- From the body-cam footage reviewed, Enforcement Officers were never anything but polite and professional in their dealings with the public.
- There were examples of repeat offenders.
- There was no list of exempt disabilities. Exemption on the grounds of disability was dependent on a medical report being provided.
- In any case in which the alleged perpetrator denies it was them, the case will go to court for a decision.
- Enforcement times were flexible - longer in summer and shorter in winter when it was not always easy to see whether an offence had been committed and when there were potentially more issues related to personal safety.
- More enforcement hours were allocated to the areas of greatest footfall.
- It was currently the Council's policy not to issue FPNs to under 18s.

There were a few points of clarification that councillors requested. The responses are listed below:

- 1) The private enforcement company Pendle Council worked with.

Response:

Pendle Council works with District Enforcement Limited.

2) Information around the recording of individuals as they commit an offence.

Response:

An officer only starts recording when they engage with an offender, and therefore an offence is never captured on film, and the Enforcement Officer's only relay that their conversation is being recorded and not the actual offence

3) If councillors were able to view the recordings taken by District?

Response:

No, as the footage forms part of a criminal investigation, and is therefore restricted viewing applies

In addition, the Waste, Recycling and Environmental Enforcement Manager, Alan Fitzpatrick, attended the fifth meeting of the group to provide an update and answer questions from councillors.

He advised the group that, because of the pandemic, the District Enforcement scheme had been formally suspended between March 2020 and July 2020. The extended national lockdown period, as well as Lancashire being designated a Tier 3 area with relatively severe restrictions for a longer period still, has meant that footfall and reporting figures have likely to have been significantly affected.

The question of issuing a warning before issuing a fixed penalty notice (FPN) was raised, in relation to a specific instance at Cleveleys beach. Alan Fitzpatrick took the view that once an offence has been committed it was perfectly appropriate to issue a FPN. It would be very difficult to be seen to be issuing warnings to some transgressors and FPNs to others. It would make the task of enforcement very difficult indeed.

He added that there is clear signage (perhaps even an excess of signage) and it is only reasonable for any visitor to the area to check the local restrictions rather than assuming that they were free to behave however, they wished to; this is the usual expectation on any visitor to any part of the country.

He presented the group with the additional information following the meeting:

- The weight of the litter bins - we cannot determine the weights solely in litterbins, as the vehicles used for litterbin emptying have multiple other functions where they collect waste, and only tend to tip-off if full or at the end of the day.
- Other authorities - District Enforcement currently work in Rossendale and Pendle (in Lancashire), but have other Council Contracts in Yorkshire, Southern and Welsh Council's.
- Updated dog fouling complaints on a ward-by-ward basis – attached at Appendix C.

- A Cleaner Greener Project Officer currently undertakes recycling and the effects of littering talks at schools & community groups on request of the group or school.

Summary of evidence provided by Warren Hodgson, Head of Environmental Crime Division at District Environmental Enforcement and Alan Fitzpatrick, Waste, Recycling and Environmental Enforcement Manager

Warren Hodgson, Head of Environmental Crime Division at District Environmental Enforcement, and Alan Fitzpatrick, the Waste, Recycling and Environmental Enforcement Manager, attended the third meeting of the task group to provide answers to questions put forward by task group members and to respond to others at the meeting.

Warren Hodgson introduced himself and gave more information about District Enforcement and how it came to be work with Wyre Borough Council.

In response to the questions asked, Warren Hodgson and Alan Fitzpatrick answered stating:

Q1) Are there any instances of people accidentally littering being fined, or are District only dealing with deliberate littering?

District only deals with deliberate littering.

Q2) How would you respond to the claim that heavy handed techniques are being employed?

All Enforcement Officers who work for the Wyre pilot scheme has at least four years of experience. They conduct themselves in a professional manner and adhered to the code of practice.

Q3) Why is the number of dog littering fines so low, and should this not be increased?

The enforcement of dog fouling offences is not easy and is very time consuming. The level of proof required is high.

Q4) Should District be making better use of the new PSPO whereby a person needs to have the ability to pick up?

37 individuals have been fined for not having the means to pick up.

Q5) Longer nights bring about an increase in dog fouling - how do you intend to tackle this problem?

There is a difficulty with the enforcement of dog fouling and littering offences in the dark. There needs to be additional risk assessments carried out for officers to work in the dark due to the risks being higher.

Q6) How many poo bags are dog owners expected to carry to avoid being fined?

There is no fixed number but people are required to have the means to pick up. Most responsible dog walkers would have numerous poo bags in most of their pockets.

Q7) Has the threat of calling the police been used to obtain personal details?

Enforcement officers only have the power of speech. The mention of contacting the police to obtain personal details is not used as a threat but to resolve a potentially dangerous situation.

Q8) What is the legal position on contacting the police and have they ever attended?

The legal position is that a crime had been committed and there was no power to restrain.

The police have been involved in the past when necessary.

Q9) Is the appeal process open and transparent or are improvements needed?

Wyre's representation (appeals) system works well and 5253 fixed penalty notices (FPNs) were issued in the past year (2019). Only on two occasions had an officer not dealt with a situation 100% professionally.

Q10) Is it right that District are issuing FPNs and also considering appeals, should it not be independent?

It was entirely appropriate that District Enforcement and the council dealt with any appeals/complaints. This was the way in which most appeals/complaints are dealt with by almost all organisations. However, a case could be referred to the Magistrates' Court if necessary.

Q11) Do the penalty tickets give clear appeal information in relation to issued fines?

Yes.

Q12) Who is handling complaints?

Wyre has an effective system for dealing with appeals and complaints. Both District and the council are involved at different stages of the appeals/complaints process.

Q13) Are they all logged on CRM and followed up?

They are not all logged on CRM. All complaints and appeals were followed up.

Q14) Could figures be provided?

Of the 5253 FPNs issued there were 536 representations (appeals) lodged. 392 were declined and 144 accepted, this included a number that were in relation to under 18s (who were not eligible to be fined under Wyre's policy).

Q15) How many permanent and part time staff are attributable to the pilot scheme?

District uses a mobile team in order to ensure that local residents are not also Enforcement Officers. The Officers used are often from outside Wyre (e.g. Blackburn). All staff are salaried and employed on a full time basis.

Q16) Are there any zero hour contracts?

No.

Q17) Is the rate of pay at or above the National Living Wage?

The pay is competitive due to the nature of the job.

Q18) Are the jobs unionised and is union membership encouraged or disapproved of?

District supports union membership, involvement and representation.

Q19) What are the Costs and revenue attributable to this contract?

Based on the number of FPN's issued in the first year of the pilot scheme, the total income was £312,000.

Wyre kept 12.5% of income from FPN's, and District 87.5%.

The breakdown of this was:

Wyre	£39,000
District	£273,000

The scheme in Wyre cost District £250,000 to operate and there were no plans to amend the percentages.

Warren Hodgson concluded stating District Environmental Enforcement are very happy with the agreement with Wyre.

Additional information requested by the task group:

Overall District Enforcement Figures Oct 2018 – Oct 2019

Total Number of FPN's Issued:	5253
Total Number of FPN's Paid:	3839
Payment Rate:	75%

Breakdown of Offences Committed

Littering (82% of which are smoking related):	4976
Failing to have the Means to Pick-up:	37
Dog Encroached onto Exclusion Zone:	98
Dog Fouling Not Removed:	97
Dogs On Leads in a Public Place:	45

Age Profile of Offenders

Age Grouping	Percentage
18 to 29	16.97%
30 to 39	15.99%
40 to 49	15.97%
50 to 59	22.45%
60 to 69	13.86%
70 and Above	7.03%
Age Unknown	7.73%

Gender Profile

Female 41%
Male 59%

Land Designation Where FPN's Issued

Relevant:	87%
Non-relevant:	13%

Representation (Appeal) Process

Total Number of Representations Lodged:	536
Total Number of Representations Declined:	392
Total Number of Representations Accepted:	144

A summary of evidence from Town and Parish Councils

The task group consulted with the Town and Parish Councils across the borough regarding the service provided by District Enforcement.

The following questions were distributed to the Parish and Town Clerks for each council in Wyre:

1. Have you seen an improvement in the amount of dog fouling in Wyre?
2. Have you seen an improvement in the amount of litter (including cigarette litter) in Wyre?
3. The maximum fine for a littering offense is set nationally at £150; however, Wyre Council issues fines of £100 (£80 for early payment) which follows legislation guidelines. Do you believe this is the right level for a fine?
4. If you have been issued with a Financial Penalty Notice in the past year for an offense, as identified above, would you say that the process was dealt with appropriately?
5. The Council currently does not issue fines to under 18 year olds but this position is under review. What do you believe is the most appropriate sanction for under 18 year olds?
6. Do you have any comments about the enforcement scheme?

The task group received responses from the following Town and Parish Councils:

- Catterall
- Garstang
- Inskip-with-Sowerby
- Pilling
- Preesall
- Winmarleigh

Due to the low response rate, these findings are only a sample of the experience Parish and Town Councils have with the District Enforcement service.

The complete findings are attached at Appendix D.

A summary of evidence from the public online consultation responses

From the 22 September 2021 until 25 October 2021, the District Enforcement Pilot task group, commissioned by the Overview and Scrutiny Committee, conducted an online public consultation that discussed the District Enforcement pilot scheme.

The results of the 2018 Life in Wyre survey showed residents were dissatisfied with how dog fouling and littering had been tackled. As a direct result, Wyre Council entered into a pilot scheme with a private company. This private company has been enforcing a number of environmental offences on behalf of the council since October 2018. The Covid-19 pandemic did affect enforcement activity (including prosecutions) as they were suspended during the lockdown. A phased reintroduction of officers patrolling the high streets and public open spaces recommencing in late 2020.

The offences that they have been enforcing are:

- Littering (including cigarette litter)
- Failing to have the means to pick-up dog fouling
- Dogs entering an exclusion zone
- Dog foul not being removed/disposed
- Dogs not on leads in Public Places
- More than 4 dogs under the control of one person in specified areas

The members believe that consulting with the public is vital to understand what residents of Wyre think about the scheme. It would then assist them in making appropriate recommendations to Wyre Council's Cabinet.

The consultation explored residents experience with the environmental enforcement service that District Enforcement provide. The consultation asked if there had been an improvement found in the amount of dog fouling in Wyre. The top three answers showed that an equal number of respondents i.e. 26.9% reported either a slight improvement, no improvement, or that it has become worse. The second question asked residents whether they have seen an improvement in litter, which included cigarette litter. It was found that for 38.5% of respondents it was about the same since the introduction of the scheme. The third question was regarding the level of fine for littering offences set at £100 (£80 for early payment), 46.2% of the respondents answered that this was a fair amount. The consultation also asked what residents believe would be the most appropriate sanction for under 18 year olds. It was found that 42.3 per cent of those who answered believed community litter pick with a fine for non-attendance was the most appropriate sanction. In addition, the consultation asked whether the respondents had been issued with a Financial Penalty Notice and whether the process had been dealt with appropriately, if the respondents answered "no" a follow up question was asked for any other views they may have of the enforcement scheme. The results showed that 85% of respondents had no experience of being issued a fine.

Approach

The agreed approach for this consultation was to use an online questionnaire. This approach enabled appropriate access to non-users and allowed a far larger reach across the borough. The Democratic Services Officer provided members with the link to

the questionnaire where they were able to distribute appropriately such as through personal social media and via email etc.

The consultation included both qualitative and quantitative data. The qualitative data provide councillors with an understanding of how individuals subjectively perceive the service; whereas the quantitative data help, councillors identify patterns within the responses.

The survey was estimated to take around five minutes, and responses were agreed to be kept anonymous.

Consultation respondents

In total, there were 26 responses to the consultation. Due to the low response rate, it is important to understand that the responses of this survey provide only a snapshot of the experience that a small sample of residents have with the District Enforcement service.

A report with the full results of the Review of littering, dog fouling and other environmental offences in Wyre public consultation is attached at Appendix E.

**A summary of evidence from Clare James, Corporate Director Resources
(Section 151 Officer)**

As requested, the Corporate Director Resources (Section 151 Officer), Clare James, provided the group with a reasonable estimate/approximation report detailing a draft costing for bringing the environmental enforcement scheme in-house.

The group considered the financial implications for the in-house costings and compared them to the current agreement with District Enforcement.

The full draft costings is attached at Appendix F.

A summary of evidence from other Local Authorities

The task group requested information on how environmental crime is enforced in other local authorities.

Members were presented with local authority responses from neighbouring Lancashire authorities and Wyre's CIPFA family group of councils.

Each authority was asked:

1. To provide the average amount of cases that are enforced?
2. Is the service ran in house or outsourced?
3. If it is outsourced, what company does the council use?
4. The frequency and amount of FPN's given?
5. How they tackle environmental crimes committed by under 18's?
6. Do they have any other arrangements when fining people with disabilities?

The group understand that this research was first brought to them before the break of the task group due to the Covid-19 lockdown. It was then updated and brought back at their sixth meeting. For that reason, they realise some of the responses may possibly be outdated, which they took that into consideration when discussing their conclusions and recommendations.

The responses are attached at Appendix G.

Conclusions and recommendations

Protecting and enhancing the quality of Wyre's neighbourhoods is an integral priority of the council. Having an effective environmental enforcement service is a vital deterrent, which helps to deliver this priority.

The council must be providing the residents of Wyre with the best service possible. On the evidence gathered during this review, the task group concludes that the council should support the service provided by District Enforcement and therefore extend their current agreement for another two years, for example from March 2022 to March 2024. The pandemic and subsequent lockdowns have caused an impact on the performance figures of the service; therefore, the agreement requires more time to fully understand how it performs. They conclude that a further Overview and Scrutiny review will be necessary within the two-year extension to assess District Enforcement's performance.

There is currently no provision for District Enforcement officers to give out official verbal warnings for certain offences. Thus, the agreement should include this provision for the following offences: failing to have the means to pick up dog fouling, dogs entering an exclusion zone, dogs not on leads in public places. This would be at the judgement of the authorised officer whether they see fit to give a fine or a warning. They should weigh up the nature and seriousness of the offence before issuing the appropriate sanction. The residents of the borough would appreciate an initial warning if this is their first offence or if they genuinely did not realise that it was an enforceable offence. It should be made clear that littering (including cigarette litter), dog foul not being removed/disposed and more than four dogs under the control of one person in specified areas should be enforced with a fine only, with no provision for a warning. In addition, the group conclude that for initial warnings to be given out there needs to be an upgrade to the IT system used by enforcement officers. An example would be a system that logs when a person has committed their first offence, as stated above, and been given a warning. Meaning that if the person commits the same offence again it will show the enforcement officer that a fine should be issued this time.

Penalties for minors is a delicate matter and the group understand the issues surrounding this, however, it is the task group's view that the council should be taking action against under 18s and explore options for penalties against the offences that District Enforcement enforce. The options explored for under 18 year olds should be either a letter sent to parents and/or a verbal, unofficial warning. This would provide an explanation to the offender and their parents of what they should and/or should not be doing. This would help ensure their actions have minimal impact on the wider community. Additionally, the group believe that the council should explore the appropriate age range for enforcement of under 18s.

The young people of the borough must be educated on the harmful impact that littering and dog fouling cause on the environment, health and wellbeing. The group understand that Wyre currently has a Cleaner Greener Project Officer who focuses on recycling and the effects of littering, and talks at schools and community groups on request. They believe that this programme should be fully endorsed by the council and that sufficient resources are available. Education does not just inform young people, but it has the potential to deter and even inspire them to do better.

The task group sees the importance of encouraging the residents of Wyre to report incidents of dog fouling on public land within the borough. This will help patrol officers monitor the situation. Therefore, the group sees the advantages of more residents being aware of procedures for reporting incidents on the council's website and this can be achieved by Wyre's Communications team sending out additional messages on social media platforms, for example.

During the review, the group gained a better understanding of the harmful impact of littering on the environment and health, particularly with the rising issue of Climate Change. They additionally understand the difficulties regarding the enforcement of these offences. Therefore, they believe it is vital that the council consider lobbying partners such as the Local Government Association (LGA) to lobby the government on the tightening of littering legislation to allow for more enforcement powers for local authorities. In addition, the group highlighted the lack of signage specifically regarding dog fouling and dogs on leads zones, particularly in some areas in Poulton-le-Fylde. They believe that the council should review and update their signage across the borough. Even though the group did not wish to put this forward as a recommendation, they wanted their concerns noted in the report.

The task group concludes that the following recommendations be made to the Cabinet:

RECOMMENDATION ONE

That the current agreement with District Enforcement is extended for a further two years, for example from March 2022 to March 2024, with the intention for an additional Overview and Scrutiny review of the service within this two-year period.

RECOMMENDATION TWO

That there is the provision for District Enforcement to issue an official warning system, in addition to fines, for the following offences:

- **Failing to have the means to pick-up dog fouling**
- **Dogs entering an exclusion zone**
- **Dogs not on leads in Public Places**

To facilitate this, the group recommends that an update to the IT system be implemented to allow warnings to be lodged electronically.

RECOMMENDATION THREE

That Wyre should strongly consider taking action against under 18 year olds and that officers could explore the options for penalties. However, the task group would recommend looking at options such as letters sent to parents and/or verbal, unofficial warnings.

RECOMMENDATION FOUR

That the council continue to support and endorse their current programme for educating young people of the borough on the harmful impact of littering.

RECOMMENDATION FIVE

That Wyre Council's communications team should send out more messages to residents regarding the reporting of dog fouling incidents.

Councillors' attendances

There were seven meetings of the task group.

Name	Meetings attended (maximum)
Councillor Tom Ingham	7
Councillor Ian Amos	4
Councillor Rita Amos	3
Councillor Lady Dulcie Atkins	3
Councillor Emma Ellison	2
Councillor Rob Fail	7
Councillor Colette Fairbanks	4
Councillor Phil Orme	5
Councillor David O'Neill*	4
Councillor Mary Stirzaker	3
Councillor Holly Swales	5
Councillor Lynn Walmsley	6

*Cllr O'Neill ceased his membership on this group following its recommissioning.

List of Appendices

Appendix A - District Enforcement Pilot Task Group – Revised Scoping Document – FINAL

Appendix B – District Environmental Pilot report

Appendix C – Dog fouling and FPN data on a ward-by-ward basis

Appendix D – Parish Council responses

Appendix E – Public Consultation

Appendix F – Estimate/ Approximation costing for bringing the environmental scheme in-house

Appendix G – Local Authority responses

District Enforcement Task Group – Revised Scoping Document

Review Topic	District Environmental Enforcement Pilot	
Chairman	Councillor Tom Ingham	
Deputy Chairman	Councillor Emma Ellison	
Other Members	<ol style="list-style-type: none"> 1. I Amos 2. R Amos 3. D Atkins 4. Fail 5. Collette Fairbanks 6. O'Neill 7. Orme 8. Stirzaker 9. Swales 10. L Walmsley 	
Officer Support	Marianne Unwin, Democratic Services Officer	
Purpose of the Review	Evaluate the effectiveness of the environmental enforcement pilot to tackle cleaner and greener issues	
Role of Overview and Scrutiny in this Review (mark all that apply)	Holding Executive to account – decisions <input type="checkbox"/> Existing budget and policy framework <input type="checkbox"/> Contribution to policy development <input checked="" type="checkbox"/> Holding Executive to account – performance <input checked="" type="checkbox"/> Community champion <input checked="" type="checkbox"/> Statutory duties / compliance with codes of practice <input type="checkbox"/>	
Aims of Review	<ol style="list-style-type: none"> 1) Evaluate the effectiveness of the environmental enforcement pilot 2) Make recommendations regarding future service provision 3) Consider opportunities to expand on the offences covered by the pilot within any future services 4) Review the council's approach for under 18's 	

	(currently the council policy is not to issue Fixed Penalty Notices to under 18 year olds; the task group could look at the issues related to reducing the age limit or consider other means of addressing littering / environmental offences by minors)
Methodology	Interview witnesses at task group meetings Benchmarking with other local authorities Consider relevant reports and documentation Public Consultations
Scope of Review	The review will include: <ul style="list-style-type: none"> • Offences covered • Results across offence types / areas (Numbers issued / payment rates) • Location of offenders – proportion of borough residents offending/regional/national • Approach taken • Added value • Improvement on cleanliness
Potential Witnesses	Street Scene, Parks and Open Spaces Portfolio Holder Corporate Director Environment Head of Public Realm and Environmental Sustainability District Enforcement Manager Waste Management Officer Legal Services Manager Head of Finance Town and Parish Council representative(s)
Documents to be considered	<ul style="list-style-type: none"> • Overview and Scrutiny Report • Portfolio Holder Executive report (to follow) • Cabinet reports
Risks	None
Level of Publicity	Medium
Indicators of a Successful Review	Clear recommendations to the Cabinet about the way forward
Intended Outcomes	A cleaner greener Wyre
Approximate Timeframe	3 months (3/4 meetings)
Projected Re-Start Date	August 2021

This page is intentionally left blank



Report of:	Meeting	Date
Councillor Simon Bridge (Street Scene, Parks & Open Spaces Portfolio Holder) and Mark Billington (Service Director People and Places)	Overview & Scrutiny Committee	09/09/2019

District Environmental Enforcement Pilot

1. Purpose of report

- 1.1 To provide Members with a precise of information in relation to the pilot project working with District to tackle a range of environmental offences.

2. Outcomes

- 2.1 The committee will assign a task group of Members to review the pilot and provide recommendations that can feed into the overall review to consider how the authority continue with environmental enforcement beyond the initial term.

3. Background

The council continue to deliver campaigns to inform, educate and enforce environmental crime through prevention, intervention and enforcement measures. Despite our pro-active approach and working with community / voluntary groups, housing associations and businesses, there are continued challenges to delivering a cleaner borough.

Cleansing priorities, water quality of the beaches, responsible dog ownership and resident concerns remain high, particularly around dog fouling and littering (including chewing gum) and these cannot be adequately addressed within current in house resources. Providing clean streets and dealing with irresponsible dog ownership continue to rank high in the Life in Wyre survey priorities.

The introduction of a specialist partner to concentrate on environmental patrols to deter and enforce was deemed necessary as education and presentation alone were not changing behaviours. Cabinet agreed in a

report of 5 September 2018 to enter into a 12 month pilot arrangement with District Enforcement to address environmental crime issues such as dog fouling, littering and other dog control measures under the Public Space Protection Orders (PSPO).

The initial agreement was subsequently extended by a further 6 months in August 2019 to enable Overview and Scrutiny to feed into the evaluation process and it would be beneficial to be able to take account of data over a longer period.

4. Key findings

District provide a range of specialist but directed support to Wyre in addressing Littering and the Public Space Protection Orders (PSPO) dog control offences.

Wyre have very close dialogue with District's sector leader, and we have a dedicated Team Leader and Enforcement Officers who operate throughout Wyre Monday-Friday, and are supported by the elite mobile team at the weekend, therefore Wyre has every day Enforcement activities in place which is provided by a minimum of 2 uniformed officers each day.

District also have dedicated back office support, with IT and software systems capable of handling / tracking enquires and producing case files in a much more effective manner than the current in-house processes Wyre have in place.

Authorised officers of Wyre Council have access to these systems and can run reports and undertake spot checks for full transparency. It was initially hoped that enforcement activity undertaken by the Councils Area Officers would be able to be recorded in the same system. However, given it is a pilot it was deemed more appropriate for the pilot to record District activity only, but including Wyre Council's Enforcement Officers on their system would certainly be something that could be explored as added value should the agreement be on a more permanent footing.

As the scheme was only introduced in October 2018, the operating hours and officer numbers have been quite fluid, primarily to take account of the dark mornings/evenings, but this fluidity has enabled patrols to be undertaken using intelligence from known problematic areas and as the daylight hours extended officers were able to patrol early mornings, early-mid evenings and bank holidays.

Wyre have always avoided patrolling in the dark (without specifically timed intelligence) as it was deemed too high a personal risk to approach individuals or groups of people in the dark.

District patrolling hours have averaged 165 hours per week over the first three quarters, with an average 102 Fixed Penalty Notices (FPN) issued

per week. The reduced patrolling hours has still ensured optimum officer deployment and ensures high footfall areas are visited regularly, as greater accumulations of pedestrian show a significantly higher level of litter issues, without reducing patrols in other areas of concerns highlighted by Members of the Public, Elected Members and Council Officers in areas such as Beachfronts & Promenades, Parks & Playing Fields as well as Residential Streets.

Two quarterly Performance Out-turns were previously reported to Members via the Executive Reports of the Street Scene, Parks and Opens Spaces Portfolio Holder.

Qtr 3 (May – July) is outlined below:

- Total FPN's issued: 1,378
- 1,218 for depositing litter.
- 160 for Dog related PSPO (45 of which for fouling).
- 5 Cancelled.
- 111 Formal Representations received, with 91 declined and 20 accepted.
- Income for this quarter: £12,296.25

Over the first three quarters, 535 cases have progressed to prosecution stage; of which :

- Not guilty / Awaiting trial = 2
- Guilty in absence = 223
- Guilty by post = 13
- Awaiting case result = 299

Individual fines have ranged from £90 - £440 as the Single Justice System takes into account an individual's personal circumstances (including income levels)

Tables below breakdown over the first three quarters

Gender	Gender Count	Percentage
Female	1635	41.44%
Male	2310	58.56%
Total:	3945	

Ethnicity	Ethnicity Count	Percentage
Not known	1	0.03%
IC1 - White - North European	3828	97.03%
IC2 - White - South European	22	0.56%
IC3 - Black	10	0.25%
IC4 - Asian (India, Pakistan, Bangladesh, Nepal)	33	0.84%

IC5 - Chinese, Japanese or other South East Asian	11	0.28%
IC6 - Arabic or North African	15	0.38%
IC9 - Unknown	25	0.63%
Total:	3945	

Income per month

	Wyre
Nov-18	£3,811.25
Dec-18	£1,510.00
Jan-19	£2,772.50
Feb-19	£3,870.00
Mar-19	£2,605.00
Apr-19	£3,629.38
May-19	£4,970.63
Jun-19	£3,972.50
Jul-19	£3,353.13
Total	£30,494.38

Monitoring

The service is overseen by the Waste Management Officer (WMO), and Street Scene Manager with support from the Legal Services Manager and her team.

The fixed penalty notice advises customers to contact District directly to lodge an appeal/representation, which does happen in the majority of cases, although a number are directed to the Civic Centre but are passed directly to District which ensures all correspondence is captured on their system.

District will undertake an initial assessment of appeals; some of which they can process directly if they have sufficient evidence/detailed information (e.g. proof of age, evidence of illness/disability from health professional), but there are occasions when an appeal will be passed to the WMO and or SSM for review/guidance.

A number of appeals admit the offence, but are submitted on an affordability basis, and on such occasions District will agree extension of the payment date on an individual basis.

A number of representations are on the grounds that once approached they returned and picked up the discarded item; but an Officer will not challenge anyone unless they move away from the item which shows they had no intention of retrieving it until approached, at which point the offence has been committed.

We receive representations from individuals who highlight a medical condition or disability as a contributory factor in them committing an

offence, and such representations are always considered if supported by evidence provided by their Medical Professional.

Prior to engaging with an individual an Officer will engage their body-cam to capture the interaction for the benefit/safety of both parties. The officers need to take a firm stance on this approach without consequences behaviour change is unlikely.

Impact across the borough

Below shows a comparison of waste collected over the same periods.

The Street Cleansing Supervisor has confirmed that for the higher footfall areas, they are issuing significantly more plastic sacks to crews who empty bins as they are having to be emptied more frequently, which by inference shows they are being used more frequently, which is certainly a positive outcome and illustrates the change in behaviours we all wanted to see.

	November 17 – July 18	November 18 – July 19
Street sweepings	1096.92	889.78
Street cleansing	392.36	448.77

Council officers undertake 900 physical inspections over a 12 month period (NI 195) which are reported three times per annum, which gives us an overview relating to the cleanliness of the Borough, and it was hoped that we could report the out-turns of this year compared to last year to determine if there was any sign of improvement, but as a full years inspections would be required for a direct comparison it would only be possible to produce such statistics in April 2020

District Enforcement Officers have informed Council officers that they are observing a marked improvement in public behaviour with an increase in people using bins and particularly respecting the PSPO's on the bathing beach areas.

District have supported a number of local initiatives with school groups to address littering and dog fouling and provided prizes for children. Equally they have committed £500 towards a bin for greener seas.

Customer reaction

As anticipated, the introduction of any regulation or enforcement activity has been met with mixed reactions, particularly on social media forums. However, it is fair to say that the comments have been quite balanced (both for and against); with a general consensus being that if you do not drop litter and pick up dog fouling then you won't have anything to worry about.

The borough has a significant number of public litter bins (over 700) accepting litter and dog foul and if there isn't one nearby our stance and that of national litter charities has always been take it home with you; this is a key message officers take when going in to schools.

We have never had an individual expressing that they believe littering to be acceptable, and their comments vary from disgust, they don't like littering/people who litter or complain that litter levels adversely affect them. Although a number of individuals have been a dissatisfaction with the level of fine for littering; many believing that £100 for a cigarette butt to be excessive, officers and the council communications team have clearly explained that this act remains a littering offence and that cigarette related litter can be very harmful to the environment. Keep Britain Tidy have run a number of national campaigns to raise awareness of this.

The Council communications team remain active in promoting a cleaner greener Wyre which has continued through this pilot, with increased articles in the e-news, social media / press.

Whilst it has not been publicised the enforcement officers have on a number of occasions assisted customers whilst out on their patrols: for example:

- Given initial first aid to an elderly lady that had tripped and injured her head. Stayed with her until the ambulance attended and provided her and her daughter with their coats to keep them warm.
- Assisted a lady that was knocked over, called the ambulance and police as suspected it was a driver under the influence and prevented the driver from leaving the scene
- Pushed a young mums car on to the verge when she had broken down at the very busy Morrison roundabout; then loaded her shopping into their car and drove the lady and her 2 children home.
- Prior to the seasonal beach ban coming in to effect, Officers handed out advisory leaflets to beach and promenade users, explained the rationale for the ban, the areas it affected, where to look out for signage / flags and liaised with local businesses to leave posters and leaflets in their premises.

Equally the Officers have been subject to threats of verbal and physical abuse; that as an authority we do not tolerate and have been working with the police to address those individuals and those that refuse to provide their details.

Minors

Officers have witnessed minors dropping litter and undertaking other anti-social behaviour e.g. pulling out bedding plants on the Mount. They do attempt to engage with them, but this is a delicate matter that needs further consideration of how details can be captured in order to issue a

warning and make their parents aware of what action may be taken with repeat offenders, with advice being sought through the joint ASB youth partnership group.

Other Lancashire Authorities

A number of other Lancashire Authorities have entered pilot agreements with District or other specialist providers since Wyre, which include; Rossendale, Pendle and Hyndburn. In the same period Burnley and Blackburn’s pilots came to an end and they have procured long term contracts for specialist environmental services.

A number of other Lancashire authorities are exploring options.

Financial and legal implications	
Finance	<i>The pilot has brought in FPN receipts to a value of £30,494.38 in the period of this review (Nov – end of July (3 Quarters). The monies from court will drip feed in as they receive it.</i>
Legal	<i>Following the pilot, should the Council wish to continue to engage a specialist company a procurement exercise will need to be undertaken. The impact on the resources of the legal team should be accounted for.</i>

Other risks/implications: checklist

If there are significant implications arising from this report on any issues marked with a ✓ below, the report author will have consulted with the appropriate specialist officers on those implications and addressed them in the body of the report. There are no significant implications arising directly from this report, for those issues marked with a x.

risks/implications	✓ / x
community safety	x
equality and diversity	x
sustainability	x
health and safety	x

risks/implications	✓ / x
asset management	x
climate change	x
data protection	x

report author	telephone no.	email	date
Ruth Hunter	7478	Ruth.hunter@wyre.gov.uk	28 August 2019

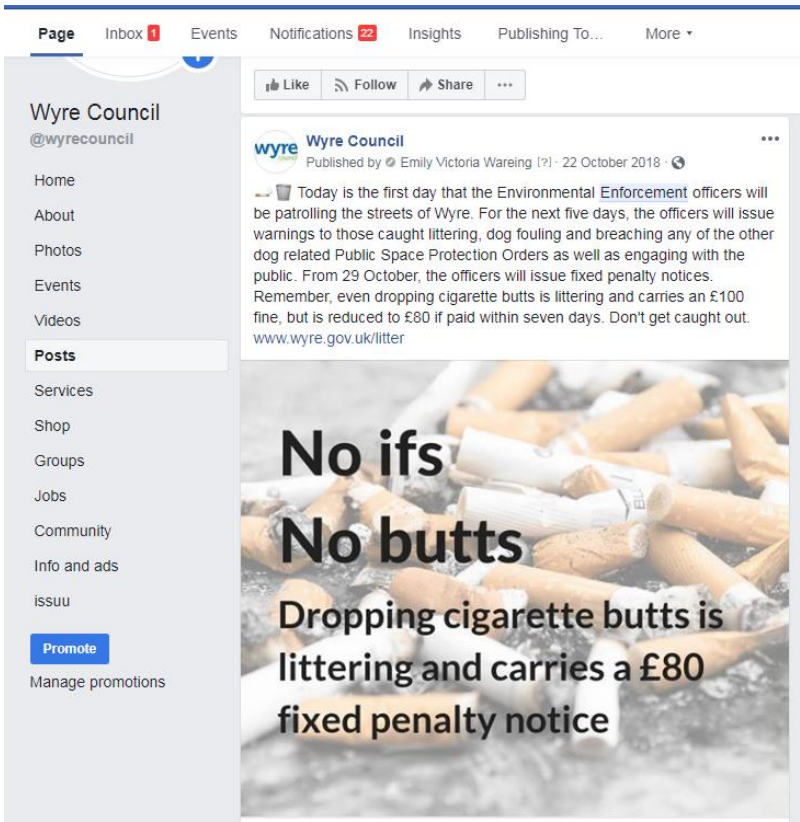
List of background papers:		
name of document	date	where available for inspection

List of appendices

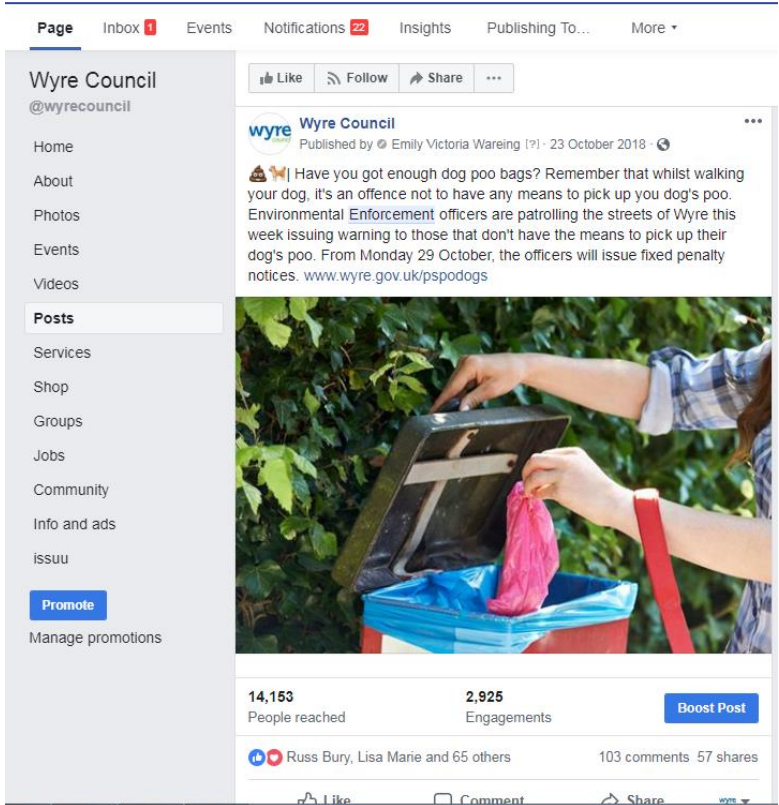
Appendix 1 Social media posts for enforcement officers

Appendix 2 Enforcement officers- e-newsletter

APPENDIX 1



Reached 32,976 people on facebook



Reached 14,153 people on facebook

Wyre Council
Published by Emily Victoria Wareing [?] · 20 September 2018

NEWS: Environment Enforcement Officers set to join council's fight against litter offenders. Wyre has listened to concerns and recognised that many residents and businesses have had enough and want more action to be taken to tackle issues such as littering and irresponsible dog ownership. Under the new deal, the council working with District Enforcement, will have more authorised officers patrolling the streets and public open spaces. Read more

WYRE.GOV.UK
Environmental Enforcement Officers set to join Wyre Council's fight against offenders | Wyre Council

6,542 People reached 1,374 Engagements [Boost Post](#)

Reached 6,542 people on facebook

Wyre Council
Published by Emily Victoria Wareing [?] · 21 January

Warning: Dropping your litter is an offence and carries a £100 fixed penalty notice. Don't get caught out, put your rubbish in the bin. <https://bit.ly/2W6DVC2>

8,729 People reached 1,668 Engagements [Boost Post](#)

Stephen Hornby, Julie Kay and 40 others 90 comments 66 shares

Reached 8,729 people on facebook



Reached 3,516 people on twitter



Reached 1,870 on twitter

Page | Inbox 1 | Events | Notifications 22 | Insights | Publishing To... | More ▾

Wyre Council
@wyrecouncil

Home | About | Photos | Events | Videos | **Posts** | Services | Shop | Groups | Jobs | Community | Info and ads | issuu | Promote | Manage promotions

Like | Follow | Share | ...

Wyre Council
Published by Emma Lyons (?) · 15 February · 🌐

Don't just bag up your dog's poo, make sure you bin it or it could cost you a £100 fine.

Dog photo: www.fropipk.com

wyre council

BAG UP YOUR DOG'S POO, ANY BIN WILL DO

Reached 8,374 people on facebook

Page | Inbox 1 | Events | Notifications 22 | Insights | Publishing To... | More ▾

Wyre Council
@wyrecouncil

Home | About | Photos | Events | Videos | **Posts** | Services | Shop | Groups | Jobs | Community | Info and ads | issuu | Promote | Manage promotions

Like | Follow | Share | ...

Wyre Council
Published by Emma Lyons (?) · 27 March at 07:00 · 🌐

Do your bit and help keep Wyre looking lovely – always pick up after your dog and put it in the bin. If not you risk getting a £100 fine.

wyre council

BAG UP YOUR DOG'S POO, ANY BIN WILL DO

2,074 | 91

Reached 2,074 people on facebook

Page | Inbox 1 | Events | Notifications 22 | Insights | Publishing To... | More ▾

Wyre Council
@wyrecouncil

Home | About | Photos | Events | Videos | **Posts** | Services | Shop | Groups | Jobs | Community | Info and ads | issuu | Promote | Manage promotions

Wyre Council
Published by Emma Lyons [?] · 22 February · 🌐

Always bag up and bin your dog's poo. Keep our streets clean and avoid a £100 fine.

Dog photo by huan3 - freepik.com

wyre council

BAG UP YOUR DOG'S POO, ANY BIN WILL DO

3,666 | 220

Reached 3,666 people on facebook

Page | Inbox 1 | Events | Notifications 22 | Insights | Publishing To... | More ▾

Wyre Council
@wyrecouncil

Home | About | Photos | Events | Videos | **Posts** | Services | Shop | Groups | Jobs | Community | Info and ads | issuu | Promote | Manage promotions

Wyre Council
Published by Emma Lyons [?] · 12 March at 12:14 · 🌐

We agree! Always bag up and bin your dog's poo or you could be fined £100.

wyre council

BAG UP YOUR DOG'S POO, ANY BIN WILL DO

3,887 | 244

Reached 3,887 people on facebook

October e-newsletter, sent to 681 residents

The screenshot shows a web browser displaying a Mailchimp campaign page. The browser's address bar shows the URL: https://us18.admin.mailchimp.com/campaigns/show?id=191417. The page header includes navigation links for Campaigns, Templates, Audience, Reports, and Content, along with a 'Create' button and the Wyre Council logo. The main content area is titled 'More Stories' and features two article cards. The first card, titled 'Officers to join council's fight against litter bugs', includes a photo of a street scene with a 'BEWARE' sign and a paragraph of text. The second card, titled '£30,000 grant awarded to Jean Stansfield Vicarage Park', includes a photo of a park and a paragraph of text. A 'Feedback' button is visible on the right side of the page. The Windows taskbar at the bottom shows the time as 09:41 on 05/04/2019.

November e-newsletter, sent to 792 residents

The screenshot shows a web browser displaying a Mailchimp campaign page. The browser's address bar shows the URL: https://us18.admin.mailchimp.com/campaigns/show?id=207333. The page header includes navigation links for Campaigns, Templates, Audience, Reports, and Content, along with a 'Create' button and the Wyre Council logo. The main content area is titled 'More Stories' and features two article cards. The first card, titled 'Officers to join council's fight against litter bugs', includes a photo of a street scene with a 'BEWARE' sign and a paragraph of text. The second card, titled 'Forgotten Melodies: Keep The Home Fires Burning', includes a photo of a musical score and a paragraph of text. A 'Feedback' button is visible on the right side of the page. The Windows taskbar at the bottom shows the time as 09:42 on 05/04/2019.

Q3 Dog Fouling and FPN 2018

Dog Fouling - Oct - Dec 2018			
HILLYLAID ROAD, THORNTON CLEVELEYS	7	Rossall	28
LARKHOLME AVENUE, FLEETWOOD	5	Bourne	12
LARKHOLME PARADE, FLEETWOOD	5	Pharos	9
NORTHWAY, FLEETWOOD	5	Stanah	9
BEARWOOD WAY, THORNTON CLEVELEYS	3	Jubilee	8
BROCK AVENUE, FLEETWOOD	3	Marsh Mill	6
BYRON AVENUE, THORNTON CLEVELEYS	3	Park	5
DUDDON AVENUE, FLEETWOOD	3	Breck	4
ESKDALE AVENUE, FLEETWOOD	3	Hambleton & Stalmine	4
GREEN DRIVE, THORNTON CLEVELEYS	3	Preesall	4
LONDON STREET, FLEETWOOD	3	Hardhorn with High Cross	3
RYECROFT AVENUE, HAMBLETON	3	Warren	3
CARTMELL AVENUE, FLEETWOOD	2	Pilling	2
HASTINGS ROAD, THORNTON CLEVELEYS	2	Tithebarn	2
SOUTH SQUARE, THORNTON CLEVELEYS	2	Calder	1
TENNYSON AVENUE, THORNTON CLEVELEYS	2	Carleton	1
TROON AVENUE, THORNTON CLEVELEYS	2	Cleveleys Park	1
BEACH AVENUE, THORNTON CLEVELEYS	1	Garstang	1
BRECK ROAD, POULTON-LE-FYLDE	1	Mount	1
CASTLE AVENUE, POULTON-LE-FYLDE	1	Victoria & Norcross	1
CHATSWORTH AVENUE, FLEETWOOD	1		105
COMPLEY AVENUE, POULTON-LE-FYLDE	1		
DEVONSHIRE AVENUE, THORNTON CLEVELEYS	1		
DEW FOREST, BARNACRE WITH BONDS	1	WEB	85
ENNERDALE AVENUE, FLEETWOOD	1	Voice In	20
ESK AVENUE, FLEETWOOD	1	Face2Face	0
FURNESS AVENUE, FLEETWOOD	1		105
HAWTHORNE ROAD, THORNTON CLEVELEYS	1		
HILLSIDE AVENUE, PREESALL	1		
LAMBS HILL CLOSE, THORNTON CLEVELEYS	1		
LAMBS ROAD, THORNTON CLEVELEYS	1		
MARKET STREET, HAMBLETON	1		
MERCIA GROVE, BLACKPOOL	1		

MOORLAND ROAD, POULTON-LE-FYLDE	1			
MOSSBOURNE ROAD, POULTON-LE-FYLDE	1			
MOUNT ROAD, FLEETWOOD	1			
MOUNT STREET, FLEETWOOD	1			
NORMOSS ROAD, NORMOSS	1			
OXENDALE ROAD, THORNTON CLEVELEYS	1			
PHAROS STREET, FLEETWOOD	1			
POULTON STREET, FLEETWOOD	1			
ROSSALL PROMENADE, THORNTON CLEVELEYS	1			
ROSSLYN CRESCENT, PREESALL	1			
ROYSTON ROAD, POULTON-LE-FYLDE	1			
RYDAL AVENUE, POULTON-LE-FYLDE	1			
SHAKESPEARE ROAD, FLEETWOOD	1			
SHAP COURT, FLEETWOOD	1			
SILVERDALE AVENUE, FLEETWOOD	1			
SMALLWOOD HEY ROAD, PILLING	1			
ST BERNARDS ROAD, KNOTT END-ON-SEA	1			
STUART ROAD, THORNTON CLEVELEYS	1			
TAYLORS LANE, PILLING	1			
THE CRESCENT, PREESALL	1			
THE ESPLANADE, FLEETWOOD	1			
THE RIDGEWAY, FLEETWOOD	1			
ULLSWATER AVENUE, FLEETWOOD	1			
VICARAGE ROAD, POULTON-LE-FYLDE	1			
VICTORIA ROAD EAST, THORNTON CLEVELEYS	1			
VICTORIA ROAD WEST, THORNTON CLEVELEYS	1			
VICTORIA STREET, FLEETWOOD	1			
WARREN AVENUE SOUTH, FLEETWOOD	1			
WEST DRIVE, THORNTON CLEVELEYS	1			
WEST GATE, FLEETWOOD	1			
WHITESIDE WAY, THORNTON CLEVELEYS	1			
WOODLEY AVENUE, THORNTON CLEVELEYS	1			
WORCESTER AVENUE, GARSTANG	1			
	105			

Area Officer Patrols - Oct - Dec 2018				
AMOUNDERNESS WAY, FLEETWOOD	15		Pharos	30

ESPLANADE, KNOTT END-ON-SEA	7		Mount	26
RYECROFT AVENUE, HAMBLETON	5		Hambleton & Stalmine	16
BLACKPOOL OLD ROAD, POULTON-LE-FYLDE	4		Jubilee	13
VICTORIA ROAD EAST, THORNTON CLEVELEYS	4		Bourne	11
VICTORIA STREET, FLEETWOOD	4		Preesall	11
BLAKISTON STREET, FLEETWOOD	3		Rossall	9
CASTLE AVENUE, POULTON-LE-FYLDE	3		Tithebarn	8
HILLSIDE AVENUE, PREESALL	3		Great Eccleston	7
NORTH PROMENADE, THORNTON CLEVELEYS	3		Garstang	6
POULTON STREET, FLEETWOOD	3		Park	5
ROSSLYN CRESCENT, PREESALL	3		Breck	4
THE CRESCENT, PREESALL	3		Carleton	4
BOLD STREET, FLEETWOOD	2		Marsh Mill	4
COPP LANE, GREAT ECCLESTON	2		Brock with Catterall	3
CROSS STREET, FLEETWOOD	2		Cleveleys Park	3
FLEETWOOD ROAD NORTH, THORNTON CLEVELEYS	2		Hardhorn with High Cross	2
GRANGE ROAD, HAMBLETON	2		Stanah	2
HIGHER LANE, SCORTON	2		Victoria & Norcross	2
LARKHOLME PARADE, FLEETWOOD	2		Warren	2
NORTH DRIVE, THORNTON CLEVELEYS	2		Wyresdale	2
RHYL STREET, FLEETWOOD	2		Calder	1
ROUGH LEA ROAD, THORNTON CLEVELEYS	2			171
SHAKESPEARE ROAD, FLEETWOOD	2			
TENNYSON AVENUE, THORNTON CLEVELEYS	2			
VICARAGE ROAD, POULTON-LE-FYLDE	2			
VICTORIA ROAD WEST, THORNTON CLEVELEYS	2			
WEST END, GREAT ECCLESTON	2			
WYRE STREET, FLEETWOOD	2			
ABBOTTS WALK, FLEETWOOD	1			
ARDEN GREEN, FLEETWOOD	1			
ASH STREET, FLEETWOOD	1			
AUGHTON STREET, FLEETWOOD	1			
BEACH AVENUE, THORNTON CLEVELEYS	1			
BEACH ROAD, THORNTON CLEVELEYS	1			
BELLS BRIDGE LANE, NATEBY	1			
BELMONT AVENUE, POULTON-LE-FYLDE	1			
BIRCH STREET, FLEETWOOD	1			
BOWNESS AVENUE, FLEETWOOD	1			
BRAMLEY AVENUE, FLEETWOOD	1			
BRIARFIELD ROAD, POULTON-LE-FYLDE	1			
BURNED HOUSE LANE, PREESALL	1			
BYRON AVENUE, THORNTON CLEVELEYS	1			
CALDERVALE AVENUE, POULTON-LE-FYLDE	1			
CARLISLE AVENUE, FLEETWOOD	1			

CARR HEAD LANE, POULTON-LE-FYLDE	1			
CARR ROAD, FLEETWOOD	1			
CHESHAM STREET, GREAT ECCLESTON	1			
CRAKE AVENUE, FLEETWOOD	1			
DEVONSHIRE AVENUE, THORNTON CLEVELEYS	1			
DEW FOREST, BARNACRE WITH BONDS	1			
FAIRMONT DRIVE, HAMBLETON	1			
FAIRWAY GARDENS, KNOTT END-ON-SEA	1			
FURNESS AVENUE, FLEETWOOD	1			
GAMBLE ROAD, THORNTON CLEVELEYS	1			
GARSTANG ROAD, GREAT ECCLESTON	1			
GARSTANG ROAD, ST MICHAELS	1			
GREEN DRIVE, THORNTON CLEVELEYS	1			
GREENFIELD ROAD, FLEETWOOD	1			
HAWTHORN DRIVE, THORNTON CLEVELEYS	1			
HAWTHORNE AVENUE, GARSTANG	1			
HEATHFIELD ROAD, FLEETWOOD	1			
HERITAGE WAY, THORNTON CLEVELEYS	1			
HIGH STREET, GARSTANG	1			
HILLYLAID ROAD, THORNTON CLEVELEYS	1			
HOLLY ROAD, THORNTON CLEVELEYS	1			
HOLTS LANE, POULTON-LE-FYLDE	1			
HOMESTEAD WAY, FLEETWOOD	1			
JOE LANE, CATTERALL	1			
KING STREET, FLEETWOOD	1			
KINGS WALK, THORNTON CLEVELEYS	1			
LAMBS ROAD, THORNTON CLEVELEYS	1			
LARKHOLME AVENUE, FLEETWOOD	1			
LINDEN CLOSE, THORNTON CLEVELEYS	1			
LONDON STREET, FLEETWOOD	1			
LONGFIELD AVENUE, POULTON-LE-FYLDE	1			
MACBETH ROAD, FLEETWOOD	1			
MANOR ROAD, FLEETWOOD	1			
MARINERS CLOSE, FLEETWOOD	1			
MARKET STREET, HAMBLETON	1			
MARSH ROAD, THORNTON CLEVELEYS	1			
MOORLAND ROAD, POULTON-LE-FYLDE	1			
MOUNT ROAD, FLEETWOOD	1			
MOUNT STREET, FLEETWOOD	1			
NORTH ALBERT STREET, FLEETWOOD	1			
NORTH CHURCH STREET, FLEETWOOD	1			
NORTHWAY, FLEETWOOD	1			
OAK STREET, FLEETWOOD	1			
OLD LANCASTER ROAD, CATTERALL	1			

PENNINE WAY, GREAT ECCLESTON	1			
PERCY STREET, FLEETWOOD	1			
PIKE COURT, FLEETWOOD	1			
PRESTON STREET, FLEETWOOD	1			
PROMENADE ROAD, FLEETWOOD	1			
QUAYSIDE, FLEETWOOD	1			
ROSSALL PROMENADE, THORNTON CLEVELEYS	1			
ROSSALL ROAD, THORNTON CLEVELEYS	1			
ROYSTON ROAD, POULTON-LE-FYLDE	1			
RYDAL AVENUE, POULTON-LE-FYLDE	1			
SEYMOUR STREET, FLEETWOOD	1			
SOUTH SQUARE, THORNTON CLEVELEYS	1			
TARN COURT, FLEETWOOD	1			
THE ESPLANADE, FLEETWOOD	1			
THE HAWTHORNS, CABUS	1			
TROON AVENUE, THORNTON CLEVELEYS	1			
WARREN STREET, FLEETWOOD	1			
WINDSOR ROAD, GARSTANG	1			
WORCESTER AVENUE, GARSTANG	1			
	171			

Fixed Penalty Notices						
October - December 2018						
					Ward	
Depositing Litter	4	0	0	0	Park	3
Failure to Remove Dog Faeces	1	0	0	0	Bourne	2
Failure to keep dog on lead in des area	1	1	0	5	Cleveleys Park	2
Perm dog to enter land where dogs exclud	0	0	0	0	Hambleton & Stalmine	2
Failing to put waste in receptacles provided	0	0	0	0	Jubilee	2
Offence Waste Receptacles	0	0	0	0	Pharos	2
Failure to Prov Waste Transfer Note	0	0	0	0	Warren	2
Flyposting/Graffiti	0	0	0	0		
Fly Tipping	2	0	0	1		
	8	1	0	6		

Advisory Notice Issued							
October - December 2018							
						Ward	
	3	0	0	0		Pharos	2
						Warren	1
	3	0	0	0			

Dog Fouling and FPN collective data 2019 – 2020

Dog Fouling - April 2019 - Mar 2020			
BRECK ROAD, POULTON-LE-FYLDE	10	Jubilee	34
BEACH ROAD, THORNTON CLEVELEYS	9	Pharos	31
OXENDALE ROAD, THORNTON CLEVELEYS	7	Breck	22
SANDYFORTH AVENUE, THORNTON CLEVELEYS	6	Bourne	21
BRADES AVENUE, THORNTON CLEVELEYS	5	Hardhorn with High Cross	21
ROSSALL PROMENADE, THORNTON CLEVELEYS	5	Mount	21
THE STRAND, FLEETWOOD	5	Preesall	20
CARR HEAD LANE, POULTON-LE-FYLDE	4	Stanah	19
GARSTANG ROAD EAST, POULTON-LE-FYLDE	4	Rossall	17
HILLSIDE AVENUE, PREESALL	4	Garstang	15
HILLYLAID ROAD, THORNTON CLEVELEYS	4	Tithebarn	12
LARKHOLME AVENUE, FLEETWOOD	4	Marsh Mill	11
LINDSAY AVENUE, POULTON-LE-FYLDE	4	Cleveleys Park	10
MOSSBOURNE ROAD, POULTON-LE-FYLDE	4	Hambleton & Stalmine	9
WARREN STREET, FLEETWOOD	4	Carleton	7
WYRESDALE AVENUE, POULTON-LE-FYLDE	4	Park	7
BEACH ROAD, FLEETWOOD	3	Brock with Catterall	5
CASTLE AVENUE, POULTON-LE-FYLDE	3	Calder	5
COPSE ROAD, FLEETWOOD	3	Great Eccleston	5
GREEN DRIVE, THORNTON CLEVELEYS	3	Victoria & Norcross	5
HARRIS STREET, FLEETWOOD	3	Warren	4
HIGH STREET, GARSTANG	3	Pilling	2
KEPPLE LANE, GARSTANG	3		
LEDBURY ROAD, NORMOSS	3		303
LONDON STREET, FLEETWOOD	3		
MOUNT ROAD, FLEETWOOD	3		
MOUNT STREET, FLEETWOOD	3		
VICTORIA ROAD WEST, THORNTON CLEVELEYS	3	WEB	209
VICTORIA STREET, FLEETWOOD	3	Voice In	94
BELMONT ROAD, FLEETWOOD	2	Face2Face	0
BLEASDALE AVENUE, POULTON-LE-FYLDE	2		
BONDS LANE, BARNACRE WITH BONDS	2		303
BROADWAY, FLEETWOOD	2		
CARR GATE, THORNTON CLEVELEYS	2		
DEEPDALE AVENUE, POULTON-LE-FYLDE	2		
HATFIELD AVENUE, FLEETWOOD	2		
KENILWORTH AVENUE, FLEETWOOD	2		
LORD STREET, FLEETWOOD	2		

MANOR ROAD, GARSTANG	2		
MARSH ROAD, THORNTON CLEVELEYS	2		
MILL STREET, PREESALL	2		
NORTHUMBERLAND AVENUE, THORNTON CLEVELEYS	2		
NORTHWAY, FLEETWOOD	2		
ORMONT AVENUE, THORNTON CLEVELEYS	2		
PILLING LANE, PREESALL	2		
RYDAL AVENUE, FLEETWOOD	2		
SANDRINGHAM AVENUE, THORNTON CLEVELEYS	2		
STATION ROAD, THORNTON CLEVELEYS	2		
STYAN STREET, FLEETWOOD	2		
SYCAMORE ROAD, BILSBORROW	2		
THE ESPLANADE, FLEETWOOD	2		
THE SQUARE, THORNTON CLEVELEYS	2		
VICARAGE ROAD, POULTON-LE-FYLDE	2		
VICTORIA ROAD EAST, THORNTON CLEVELEYS	2		
WOODLEY AVENUE, THORNTON CLEVELEYS	2		
WYRE LANE, GARSTANG	2		
ADDISON ROAD, FLEETWOOD	1		
ADELAIDE AVENUE, THORNTON CLEVELEYS	1		
ALPINE HEIGHTS, GARSTANG	1		
ARTHURS LANE, HAMBLETON	1		
BALMORAL PLACE, THORNTON CLEVELEYS	1		
BANCROFT AVENUE, THORNTON CLEVELEYS	1		
BARROWS LANE EAST, GREAT ECCLESTON	1		
BEACH ROAD, PREESALL	1		
BELVEDERE ROAD, THORNTON CLEVELEYS	1		
BERWICK AVENUE, THORNTON CLEVELEYS	1		
BISPHAM ROAD, POULTON-LE-FYLDE	1		
BOLD STREET, FLEETWOOD	1		
BOWLAND ROAD, CABUS	1		
BRENTWOOD AVENUE, POULTON-LE-FYLDE	1		
BROAD LANE, WINMARLEIGH	1		
BROADFIELD AVENUE, POULTON-LE-FYLDE	1		
BROMPTON ROAD, POULTON-LE-FYLDE	1		
BROWNS LANE, STALMINE-WITH-STAYNALL	1		
BYERWORTH LANE NORTH, BARNACRE WITH BONDS	1		
CATHROW WAY, THORNTON CLEVELEYS	1		

CENTRAL AVENUE NORTH, THORNTON CLEVELEYS	1		
CHATSWORTH AVENUE, FLEETWOOD	1		
CHESTER AVENUE, THORNTON CLEVELEYS	1		
CHURCH LANE, WINMARLEIGH	1		
CHURCH STREET, CHURCHTOWN	1		
CHURCH STREET, GARSTANG	1		
CLARENCE AVENUE, KNOTT END-ON-SEA	1		
CLEVELEYS AVENUE, THORNTON CLEVELEYS	1		
CUMBERLAND AVENUE, THORNTON CLEVELEYS	1		
DANIEL FOLD LANE, CATTERALL	1		
DARBISHIRE ROAD, FLEETWOOD	1		
DERBY ROAD, THORNTON CLEVELEYS	1		
DOBSON ROAD, NORMOSS	1		
DOCK STREET, FLEETWOOD	1		
DOVEDALE AVENUE, THORNTON CLEVELEYS	1		
ELMWOOD AVENUE, PREESALL	1		
ESPLANADE, KNOTT END-ON-SEA	1		
FAIRCLOUGH ROAD, THORNTON CLEVELEYS	1		
FERNWOOD AVENUE, THORNTON CLEVELEYS	1		
FLEETWOOD ROAD NORTH, THORNTON CLEVELEYS	1		
FORDSTONE AVENUE, PREESALL	1		
FYLDE ROAD, POULTON-LE-FYLDE	1		
GARSTANG ROAD WEST, POULTON-LE-FYLDE	1		
GARSTANG ROAD, CATTERALL	1		
GRANGE ROAD, FLEETWOOD	1		
GRASMERE AVENUE, FLEETWOOD	1		
GRASMERE AVENUE, THORNTON CLEVELEYS	1		
GREEN DRIVE, POULTON-LE-FYLDE	1		
GREEN LANE EAST, CABUS	1		
GREENWAY, CATTERALL	1		
HACKENSALL ROAD, KNOTT END-ON-SEA	1		
HAMLET ROAD, FLEETWOOD	1		
HARDHORN WAY, POULTON-LE-FYLDE	1		
HAWKSHEAD ROAD, KNOTT END-ON-SEA	1		
HAWTHORNE ROAD, THORNTON CLEVELEYS	1		
HOPE CLOSE, THORNTON CLEVELEYS	1		
HORNSEA CLOSE, THORNTON CLEVELEYS	1		

KILN LANE, HAMBLETON	1		
KINGSWAY, THORNTON CLEVELEYS	1		
LANCASTER ROAD, PILLING	1		
LARKHOLME PARADE, FLEETWOOD	1		
LEICESTER AVENUE, THORNTON CLEVELEYS	1		
LOWER GREEN, POULTON-LE-FYLDE	1		
MANOR ROAD, FLEETWOOD	1		
MANOR ROAD, INSKIP WITH SOWERBY	1		
MARINE PARADE, FLEETWOOD	1		
MARINERS CLOSE, FLEETWOOD	1		
MARSH LANE, HAMBLETON	1		
MERCIA GROVE, BLACKPOOL	1		
MILTON STREET, FLEETWOOD	1		
MOORLAND ROAD, POULTON-LE-FYLDE	1		
MOSS LANE, GARSTANG	1		
NEDS LANE, STALMINE-WITH-STAYNALL	1		
NEW ROAD, STALMINE-WITH-STAYNALL	1		
NORTH ALBERT STREET, FLEETWOOD	1		
NORTH DRIVE, THORNTON CLEVELEYS	1		
NORTH PROMENADE, THORNTON CLEVELEYS	1		
NORTH SQUARE, THORNTON CLEVELEYS	1		
NUTTER ROAD, THORNTON CLEVELEYS	1		
OXENHOLME AVENUE, THORNTON CLEVELEYS	1		
PARK LANE, PREESALL	1		
PARKSWAY, KNOTT END-ON-SEA	1		
PASTURE DRIVE, BARNACRE-WITH-BONDS	1		
PAULS LANE, HAMBLETON	1		
PHAROS STREET, FLEETWOOD	1		
PINE CRESCENT, POULTON-LE-FYLDE	1		
POULTON STREET, FLEETWOOD	1		
PROMENADE ROAD, FLEETWOOD	1		
QUAIL HOLME ROAD, KNOTT END-ON-SEA	1		
RAIKES ROAD, GREAT ECCLESTON	1		
RAVENSWOOD AVENUE, NORMOSS	1		
RICHMOND AVENUE, THORNTON CLEVELEYS	1		
ROSSALL CLOSE, FLEETWOOD	1		
ROSSALL GRANGE LANE, FLEETWOOD	1		
ROSSENDALE AVENUE NORTH, THORNTON CLEVELEYS	1		
ROSSENDALE AVENUE SOUTH, THORNTON CLEVELEYS	1		
ROUNDWAY, FLEETWOOD	1		

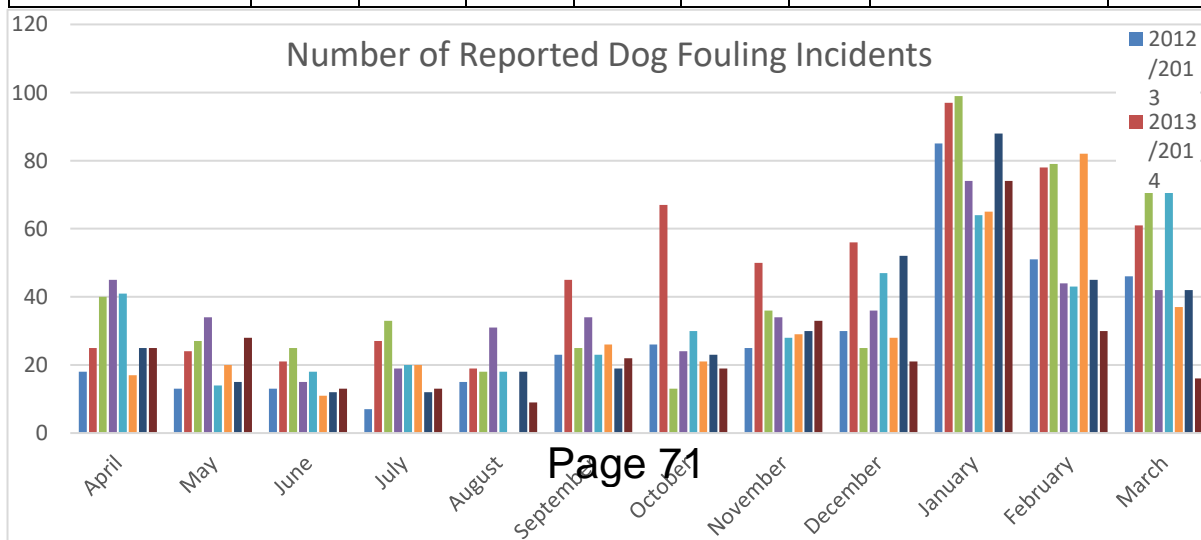
ROYSTON ROAD, POULTON-LE-FYLDE	1		
SANDY LANE, PREESALL	1		
SEFTON AVENUE, POULTON-LE-FYLDE	1		
SHAFTESBURY AVENUE, THORNTON CLEVELEYS	1		
SKIPPOOL AVENUE, POULTON-LE-FYLDE	1		
SLINGER ROAD, THORNTON CLEVELEYS	1		
SOUTHWAY, FLEETWOOD	1		
SOUTHWORTH WAY, THORNTON CLEVELEYS	1		
ST BERNARDS ROAD, KNOTT END-ON-SEA	1		
STATION ROAD, POULTON-LE-FYLDE	1		
SUNDERLAND AVENUE, THORNTON CLEVELEYS	1		
TARNACRE VIEW, BARNACRE WITH BONDS	1		
TAYLORS CLOSE, POULTON-LE-FYLDE	1		
TENNYSON AVENUE, THORNTON CLEVELEYS	1		
THE BAY, THORNTON CLEVELEYS	1		
ULLSWATER CRESCENT, THORNTON CLEVELEYS	1		
WALMSLEY STREET, FLEETWOOD	1		
WANSBECK AVENUE, FLEETWOOD	1		
WARING DRIVE, THORNTON CLEVELEYS	1		
WARREN DRIVE, THORNTON CLEVELEYS	1		
WARRENHURST ROAD, FLEETWOOD	1		
WATERS REACH, THORNTON CLEVELEYS	1		
WENSLEY AVENUE, FLEETWOOD	1		
WEST WAY, FLEETWOOD	1		
WESTBOURNE ROAD, KNOTT END-ON-SEA	1		
WESTBOURNE ROAD, THORNTON CLEVELEYS	1		
WHINFIELD AVENUE, FLEETWOOD	1		
WILLOW GROVE, HAMBLETON	1		
WINDERMERE AVENUE, FLEETWOOD	1		
WOODFIELD ROAD, THORNTON CLEVELEYS	1		

Area Officer Patrols - April 2019 - Mar 2020			
FORESHORE, FLEETWOOD	6	Pharos	20
THE ESPLANADE, FLEETWOOD	5	Warren	4
BEACH ROAD, FLEETWOOD	3	Mount	4
ASH STREET, FLEETWOOD	2	Stanah	3
BLACKPOOL OLD ROAD, POULTON-LE-FYLDE	2	Tithebarn	3
STANAH ROAD, THORNTON CLEVELEYS	2	Great Eccleston	2

BALMORAL TERRACE, FLEETWOOD	1		Park	2
BRAMLEY AVENUE, FLEETWOOD	1		Hardhorn with High Cross	2
CHATSWORTH AVENUE, FLEETWOOD	1		Jubilee	2
CHAUCER ROAD, FLEETWOOD, LANCASHIRE	1		Marsh Mill	1
CROSS STREET, FLEETWOOD	1		Pilling	1
ESPLANADE, KNOTT END-ON-SEA	1		Bourne	1
HARDHORN WAY, POULTON-LE-FYLDE	1		Hambleton & Stalmine	1
HATHAWAY ROAD, FLEETWOOD	1		Rossall	1
HAWTHORNE ROAD, THORNTON CLEVELEYS	1			
LADLEYS WALK, FLEETWOOD	1			47
LEVENS DRIVE, POULTON-LE-FYLDE	1			
LINDADALE AVENUE, THORNTON CLEVELEYS	1			
LINDEL ROAD, FLEETWOOD	1			
LINGFIELD ROAD, FLEETWOOD	1			
LORD STREET, FLEETWOOD	1			
NORTH PROMENADE, THORNTON CLEVELEYS	1			
OXENDALE ROAD, THORNTON CLEVELEYS	1			
PRESTON STREET, FLEETWOOD	1			
SCHOOL LANE, INSKIP WITH SOWERBY	1			
TAYLORS LANE, PILLING	1			
TITHEBARN STREET, POULTON-LE-FYLDE	1			
VICTORIA STREET, FLEETWOOD	1			
WARREN STREET, FLEETWOOD	1			
WINDSOR PLACE, FLEETWOOD	1			
WOODS LANE, INSKIP-WITH-SOWERBY	1			
WEETON AVENUE, THORNTON CLEVELEYS, LANCASHIRE	1			
WYRE STREET, FLEETWOOD, LANCASHIRE	1			

Advisory Notice Issued								
April 2019 - March 2020								
							Ward	
	2	0	0	0			Pharos	1
							Pheasant Wood	1
	2	0	0	0				
Fixed Penalty Notices								
April 2019 - March 2020								
							Ward	

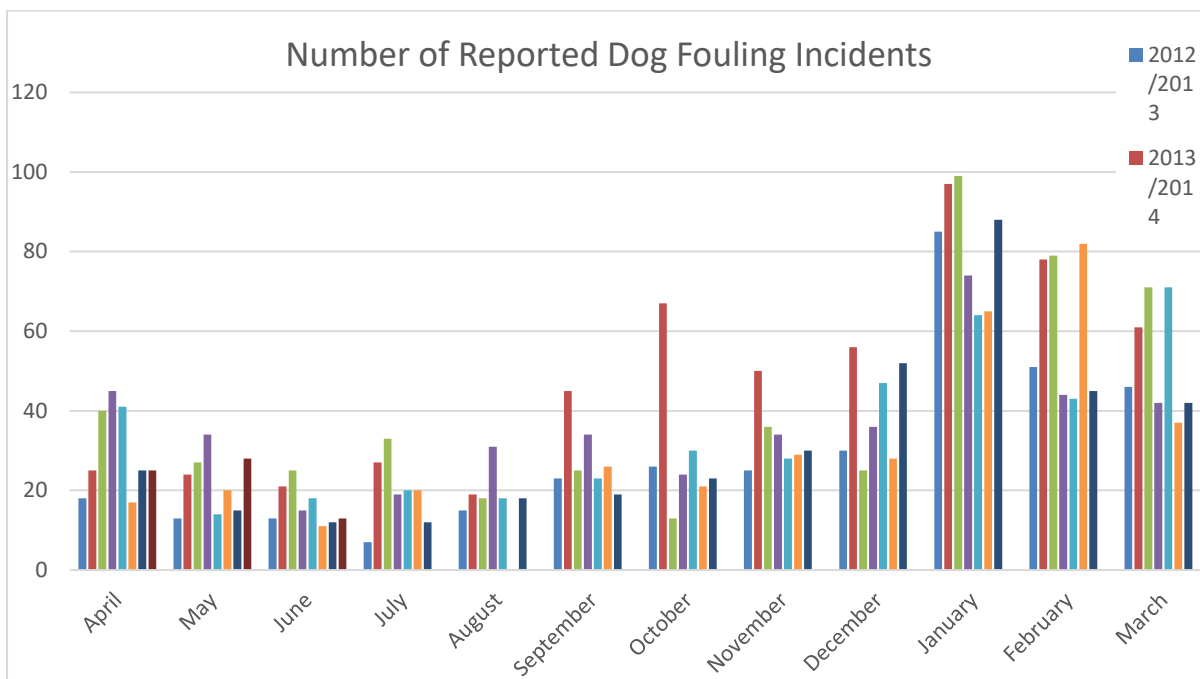
Depositing Litter	12	1	1	3	3		Pharos	9
Failure to Remove Dog Faeces	0	0	0	2	3		Mount	8
Failure to keep dog on lead in des area	5	2	0	1	3		Preesall	3
Failure to keep dog on lead when req	0	0	0	2	0		Unknown	2
Perm dog to enter land where dogs exclud	0	0	0	0	0		Carleton	2
Failing to put waste in receptacles provided	0	0	0	0	0		Garstang	2
Offence Waste Receptacles	0	0	0	0	0		Great Eccleston	2
Failure to Prov Waste Transfer Note	1	0	0	2	2		Hardhorn with High Cross	2
Flyposting/Graffiti	0	0	0	0	0		Marsh Mill	2
Fly Tipping	3	2	1	1	0		Park	2
							Pilling	2
	21	5	2	11	11		Rossall	2
							Tithebarn	2
							Warren	2
							Bourne	1
							Breck	1
							Brock	1
							Brock with Catterall	1
							Cleveleys Park	1
							Hambleton & Stalmine	1
							Jubilee	1
							Stanah	1



Q2 Dog Fouling and FPN 2020 – 2021

Dog Fouling - July - September 2020				
BEACH ROAD, FLEETWOOD	2		Cleveleys Park	6
BRECK ROAD, POULTON-LE-FYLDE	2		Pharos	6
CLEVELEYS AVENUE, THORNTON CLEVELEYS	2		Garstang	4
CONISTON AVENUE, THORNTON CLEVELEYS	2		Hardhorn with High Cross	3
GRANGE ROAD, FLEETWOOD	2		Jubilee	3
MOWBRAY ROAD, FLEETWOOD	2		Rossall	3
NORTH DRIVE, THORNTON CLEVELEYS	2		Warren	3
NORTH STREET, FLEETWOOD	2		Bourne	2
WESTBOURNE ROAD, THORNTON CLEVELEYS	2		Breck	2
WORDSWORTH AVENUE, THORNTON CLEVELEYS	2		Marsh Mill	2
APPLE TREE CLOSE, ST MICHAELS-ON-WYRE	1		Mount	2
BEACH ROAD, THORNTON CLEVELEYS	1		Park	2
BEECHWOOD COURT, POULTON-LE-FYLDE	1		Preesall	2
BOWLAND ROAD, CABUS	1		Great Eccleston	1
BROOK STREET, FLEETWOOD	1		Victoria & Norcross	1
DURHAM AVENUE, THORNTON CLEVELEYS	1		Wyresdale	1
ETTRICK AVENUE, FLEETWOOD	1			
HAZELHURST DRIVE, GARSTANG	1			43
HILLSIDE AVENUE, PREESALL	1			
HOLLINS LANE, FORTON	1		WEB	33
LONDON STREET, FLEETWOOD	1		Voice In	10
MANOR ROAD, GARSTANG	1		Face2Face	0
MARINE PARADE, FLEETWOOD	1			
MELBOURNE AVENUE, FLEETWOOD	1			43
NORMOSS ROAD, NORMOSS	1			
NORTHUMBERLAND AVENUE, THORNTON CLEVELEYS	1			
PARK LANE, PREESALL	1			
PRESTON STREET, FLEETWOOD	1			
SEFTON AVENUE, POULTON-LE-FYLDE	1			
SNAPEWOOD LANE, CABUS	1			
THE ESPLANADE, FLEETWOOD	1			
THE HERMITAGE, THORNTON CLEVELEYS	1			
VICTORIA STREET, FLEETWOOD	1			
	43			

Area Officer Patrols - July - September 2020			
THE ESPLANADE, FLEETWOOD	7		Pharos



Fixed Penalty Notices						
April - Sept 2020						
					Ward	
Depositing Litter	2	0	1	1	Pharos	2
Failure to Remove Dog Faeces	0	0	0	0	Mount	1
Failure to keep dog on lead in des area	0	1	0	0	Marsh Mill	1
Perm dog to enter land where dogs exclud	0	0	0	0	Unknown	1
Failing to put waste in receptacles provided	0	0	0	0		
Offence Waste Receptacles	0	0	0	0		
Failure to Prov Waste Transfer Note	0	0	0	0		
Flyposting/Graffiti	0	0	0	0		
Fly Tipping	0	0	0	0		
	2	1	1	1		

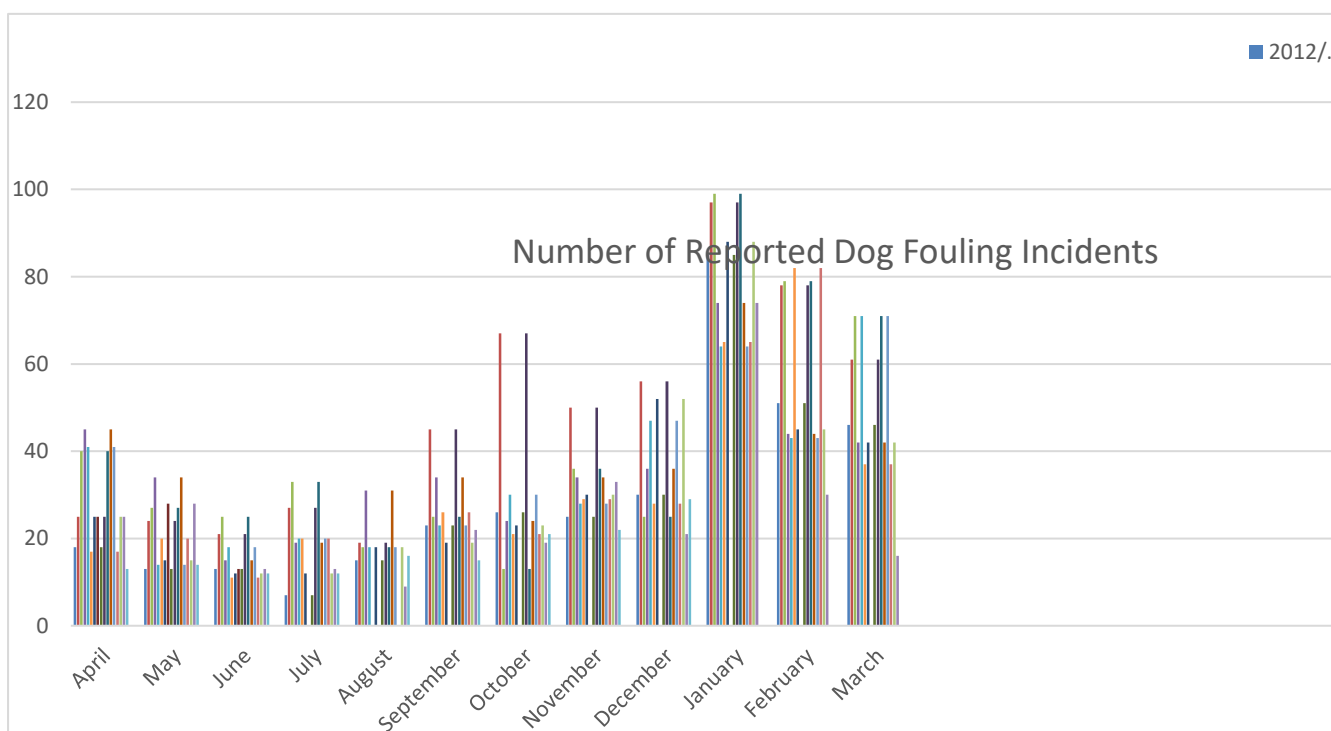
Advisory Notice Issued							
April - Sept 2020							
						Ward	
	1	1	0	0		Bourne	1
						Pharos	1
	1	1	0	0			

Q3 Dog Fouling and FPN 2020 – 2021

Dog Fouling - October - December 2020				
BRECK ROAD, POULTON-LE-FYLDE	4		Pharos	12
LEICESTER AVENUE, THORNTON CLEVELEYS	4		Cleveleys Park	10
LONDON STREET, FLEETWOOD	4		Bourne	7
BEACH ROAD, THORNTON CLEVELEYS	3		Breck	7
SANDYFORTH AVENUE, THORNTON CLEVELEYS	3		Tithebarn	5
CLEVELEYS AVENUE, THORNTON CLEVELEYS	2		Hardhorn with High Cross	4
LONGFIELD AVENUE, POULTON-LE-FYLDE	2		Jubilee	4
MOSSBOURNE ROAD, POULTON-LE-FYLDE	2		Marsh Mill	4
MOWBRAY ROAD, FLEETWOOD	2		Park	3
ROSSALL ROAD, THORNTON CLEVELEYS	2		Preesall	3
ROYSTON ROAD, POULTON-LE-FYLDE	2		Rossall	3
BAYLTON DRIVE, CATTERALL	1		Warren	3
BEARWOOD WAY, THORNTON CLEVELEYS	1		Hambleton & Stalmine	2
BELVEDERE ROAD, THORNTON CLEVELEYS	1		Brock with Catterall	1
BIRKDALE AVENUE, FLEETWOOD	1		Carleton	1
BISPHAM ROAD, POULTON-LE-FYLDE	1		Garstang	1
BLAKISTON STREET, FLEETWOOD	1		Mount	1
BOURNE MAY ROAD, KNOTT END-ON-SEA	1		Stanah	1
BROOKFIELD ROAD, THORNTON CLEVELEYS	1			
CALDER AVENUE, THORNTON CLEVELEYS	1			72
CANTERBURY CLOSE, GARSTANG	1			
CHESTER AVENUE, POULTON-LE-FYLDE	1			
CHURCH ROAD, THORNTON CLEVELEYS	1			
CONWAY AVENUE, NORMOSS	1		WEB	57
FAIRFIELD AVENUE, NORMOSS	1		Voice In	15
FLEETWOOD ROAD NORTH, THORNTON CLEVELEYS	1		Face2Face	0
GARFIELD STREET, FLEETWOOD	1			
HARDHORN ROAD, POULTON-LE-FYLDE	1			72
HIGHCROSS ROAD, POULTON-LE-FYLDE	1			
KILN LANE, HAMBLETON	1			
LAIDLEYS WALK, FLEETWOOD	1			
LARKHOLME AVENUE, FLEETWOOD	1			
LAWSONS ROAD, THORNTON CLEVELEYS	1			
MOUNT ROAD, FLEETWOOD	1			
NORTH ALBERT STREET, FLEETWOOD	1			
NORTH CHURCH STREET, FLEETWOOD	1			
NORTH DRIVE, THORNTON CLEVELEYS	1			

NORTH PROMENADE, THORNTON CLEVELEYS	1		
NORTH STREET, FLEETWOOD	1		
PHAROS STREET, FLEETWOOD	1		
POULTON ROAD, FLEETWOOD	1		
PRINCES WAY, FLEETWOOD	1		
QUAIL HOLME ROAD, KNOTT END-ON-SEA	1		
RINGWAY, THORNTON CLEVELEYS	1		
ROSSENDALE AVENUE SOUTH, THORNTON CLEVELEYS	1		
SEFTON AVENUE, POULTON-LE-FYLDE	1		
SMITHY LANE, STALMINE-WITH-STAYNALL	1		
TENNYSON AVENUE, THORNTON CLEVELEYS	1		
TORONTO AVENUE, FLEETWOOD	1		
ULLSWATER AVENUE, FLEETWOOD	1		
VICTORIA STREET, FLEETWOOD	1		
WOOD STREET, FLEETWOOD	1		
WORSLEY CLOSE, KNOTT END-ON-SEA	1		

Area Officer Patrols - October - December 2020			
THE ESPLANADE, FLEETWOOD	8	Pharos	8
BEACH ROAD, FLEETWOOD	2	Warren	2
			10

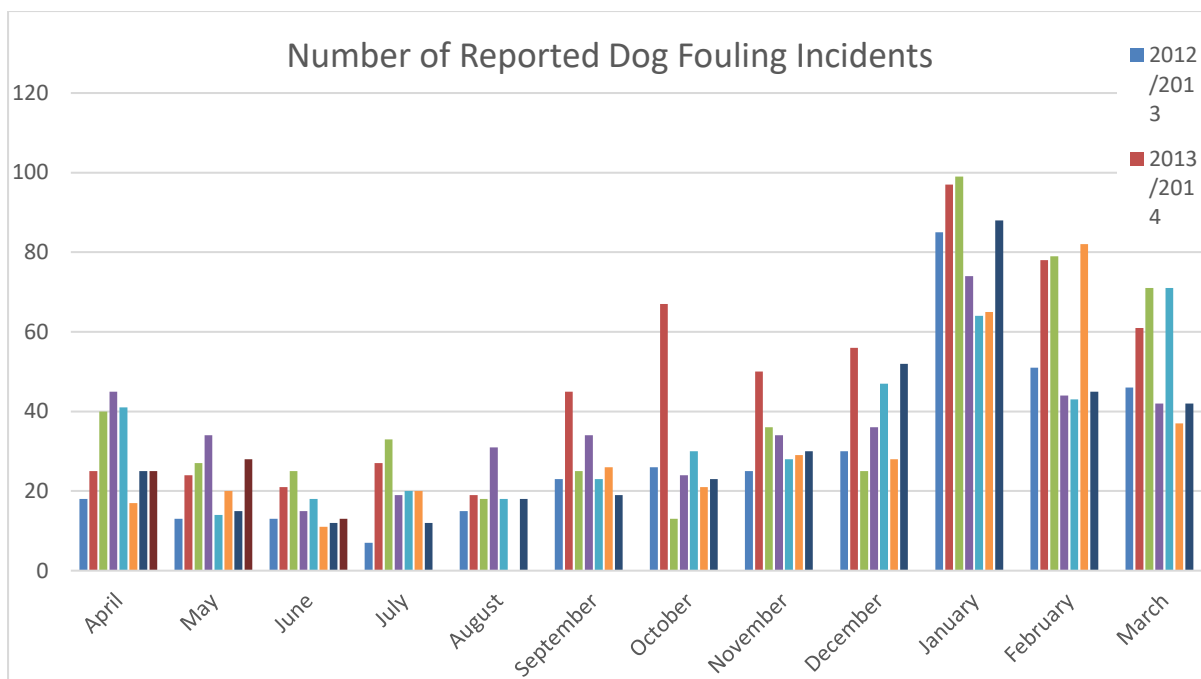


Fixed Penalty Notices							
October - December 2020							
						Ward	
Depositing Litter	0	0	0	0		Marsh Mill	2
Failure to Remove Dog Faeces	0	0	0	0			
Failure to keep dog on lead in des area	0	0	0	0			
Perm dog to enter land where dogs exclud	0	0	0	0			
Failing to put waste in receptacles provided	0	0	0	0			
Offence Waste Receptacles	0	0	0	1			
Failure to Prov Waste Transfer Note	0	0	0	1			
Flyposting/Graffiti	0	0	0	0			
Fly Tipping	0	0	0	0			
	0	0	0	2			
Advisory Notice Issued							
October - December 2020							
						Ward	
	0	0	0	0			
	0	0	0	0			

Q1 Dog Fouling and FPN 2021 – 2022

Dog Fouling - April - Jun 2021			
FLEETWOOD ROAD NORTH, THORNTON CLEVELEYS	3		Bourne 5
ALDER GROVE, POULTON-LE-FYLDE	2		Pharos 5
BEACH ROAD, FLEETWOOD	2		Hardhorn with High Cross 4
BRECK ROAD, POULTON-LE-FYLDE	2		Mount 4
DEEPDALE AVENUE, POULTON-LE-FYLDE	2		Marsh Mill 3
GREEN LANE EAST, CABUS	2		Breck 2
NORTH DRIVE, THORNTON CLEVELEYS	2		Carleton 2
TENNYSON AVENUE, THORNTON CLEVELEYS	2		Cleveleys Park 2
VICTORIA STREET, FLEETWOOD	2		Garstang 2
ALDER CLOSE, THORNTON CLEVELEYS	1		Stanah 2
ALEXANDRA ROAD, THORNTON CLEVELEYS	1		Brock 1
BENEDICT DRIVE, BLACKPOOL	1		Jubilee 1
BOLD STREET, FLEETWOOD	1		Pilling 1
CLEGG AVENUE, THORNTON CLEVELEYS	1		Preesall 1
GARSTANG ROAD, BILSBORROW	1		Rossall 1
LAMBS ROAD, THORNTON CLEVELEYS	1		
LAWSONS ROAD, THORNTON CLEVELEYS	1		
LINDSAY AVENUE, POULTON-LE-FYLDE	1		
MEMORIAL PARK, WARRENHURST ROAD, FLEETWOOD,	1		36
PARK LANE, PREESALL	1		
RADCLIFFE ROAD, FLEETWOOD	1		
STATION ROAD, THORNTON CLEVELEYS	1		WEB 31
STYAN STREET, FLEETWOOD	1		Voice In 5
TAYLORS LANE, PILLING	1		Face2Face 0
THE ESPLANADE, FLEETWOOD	1		
ULLSWATER AVENUE, FLEETWOOD	1		36

Area Officer Patrols - April - Jun 2021			
THE ESPLANADE, FLEETWOOD	3		Pharos 3
NORTH PROMENADE, THORNTON CLEVELEYS	1		Jubilee 1
			4



Fixed Penalty Notices							
April - June 2020							
					Ward		
Depositing Litter	0	0	0	1	Breck		1
Failure to Remove Dog Faeces	0	0	0	0	Hambleton & Stalmine		1
Failure to keep dog on lead in des area	1	0	0	0	Mount		1
Perm dog to enter land where dogs exclud	0	0	0	0	Park		
Failing to put waste in receptacles provided	0	0	0	0			
Offence Waste Receptacles	0	0	0	0			
Failure to Prov Waste Transfer Note	0	0	0	0			
Flyposting/Graffiti	0	0	0	0			
Fly Tipping	1	0	0	0			
	2	0	0	1			
Advisory Notice Issued							
April - June 2020							
					Ward		

	1	0	0	0		Rossall	1
	1	0	0	0			

District Enforcement Task Group - Parish and Town Council responses						
	Catterall	Garstang Town	Inskip-with-Sowerby	Pilling	Preesall	Winmarleigh
1. Have you seen an improvement in the amount of dog fouling in Wyre?	No improvement, the amount of dog fouling has increase	No improvement	No improvement	There has been no improvement in the amount of dog fouling in Pilling. Areas especially hit/used include School Lane around the Olde Ship, Pilling Village Hall Recreation Field, Lane Ends Amenity Area and curiously opposite the Waste Treatment Plant on Back Sands Lane, which needs a litter bin. With reference to Lane Ends Amenity Area owned by the Environment Agency, but bins emptied by Wyre Council, a Wyre litter bin is needed on the boundary at the car park. the car park is well used and litter and dog fouling is left on site.	No improvement	No improvement
2. Have you seen an improvement in the amount of litter (including cigarette litter) in Wyre?	No improvement. Catterall Parish Council employ a Lengthsman who conducts little clearance daily	About the same	No improvement	Pilling PC employs a Parish Lengthsman who cleans the Parish, picking up dog fouling and litter.	No improvement	No improvement
3. The maximum fine for a littering offense is set nationally at £150, however Wyre Council issues fines of £100 (£80 for early payment) which follows legislation guidelines. Do you believe this is the right level for a fine?	Fair amount	Fair amount	/	Fair amount	If a fine is to be issued then it is a fair amount. However, the emphasis should move towards prevention rather than sanctions.	Too low
4. If you have been issued with a Financial Penalty Notice in the past year for an offense, as identified above, would you say that the process was dealt with appropriately?	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
5. The council currently does not issue fines to under 18 year olds but this position is under review. Please place a tick in the box that you believe would be the most appropriate sanction for under 18 year olds	Fine 16 – 18 year olds at the full rate (£100 or £80 for early payment)	Community litter pick	/	Fine 16 – 18 year olds at the full rate (£100 or £80 for early payment)	Community litter pick	Letter sent to parents and community litter pick
6. Do you have any comments about the enforcement scheme?	Councillors request Wyre Council send the dog wardens more often and randomly. Signage on streets to dissuade dog fouling now; against darker nights.	Garstang TC suggest that the reporting of dog fouling should be promoted more, so that the dog fouling can be logged. Garstang TC would like to know how often the enforcement officers come to Garstang.	Parish Councillors at Inskip with Sowerby are unaware of any activity locally	Councillors would like to see more visits to the parish and prosecutions, but to inform the PC after the visits. This pilot scheme was introduced at Wyre Area LALC when the Parishes were promised feed back and updates. This happen once!	More regular patrols of key locations out of working hours would be more likely to deter offenders.	Dog fouling enforcement is inadequate both on open spaces and in towns

No response from: Barnacre with Bonds, Barton, Bleasdale, Cabus, Cloughton-on-Brock, Fleetwood, Forton, Great Eccleston, Hambleton, Kirkland, Myerscough and Bilsborrow, Nateby, Out Rawcliffe, Stalmine-with-Staynall, Upper Rawcliffe with Tarnacre

This page is intentionally left blank

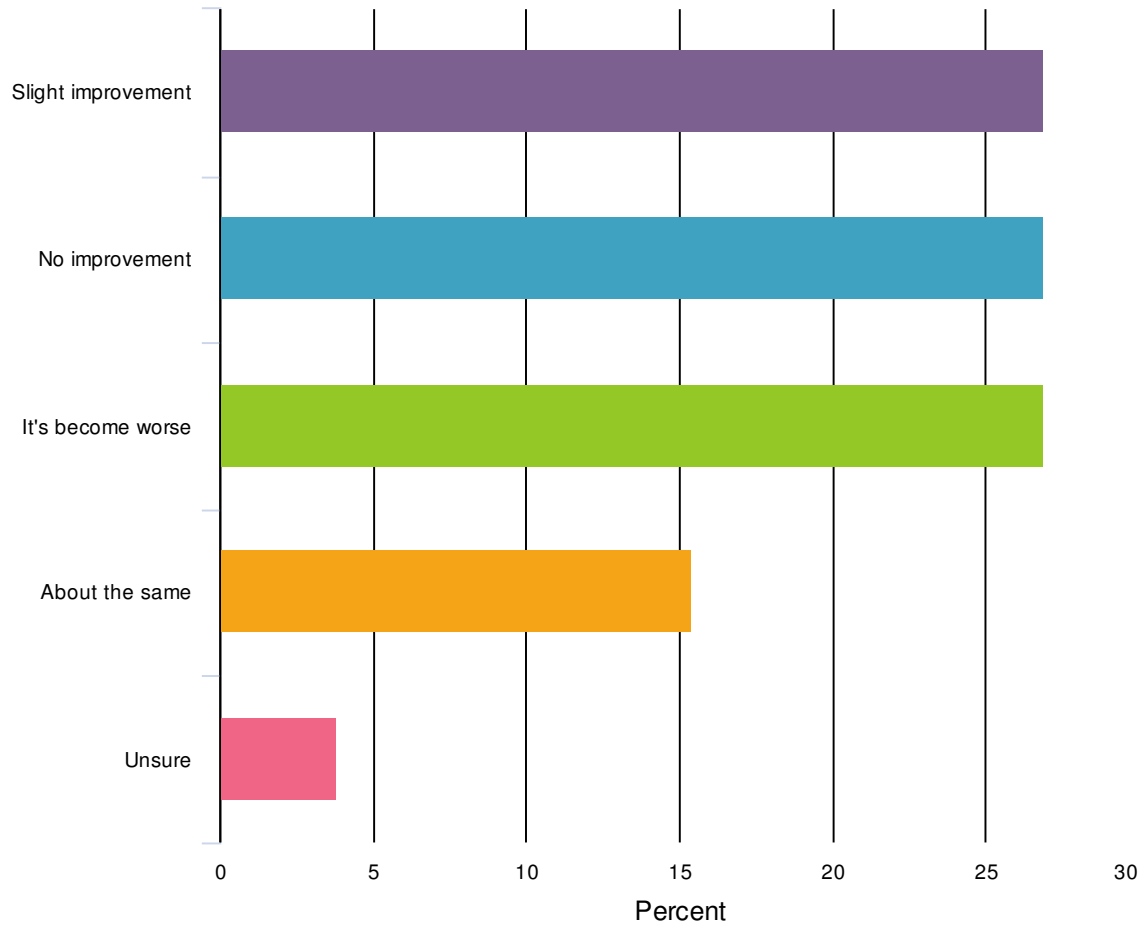
District Enforcement Task Group: Report for Review of Littering, Dog Fouling and Other Environmental Offences in Wyre

Response Counts



Totals: 26

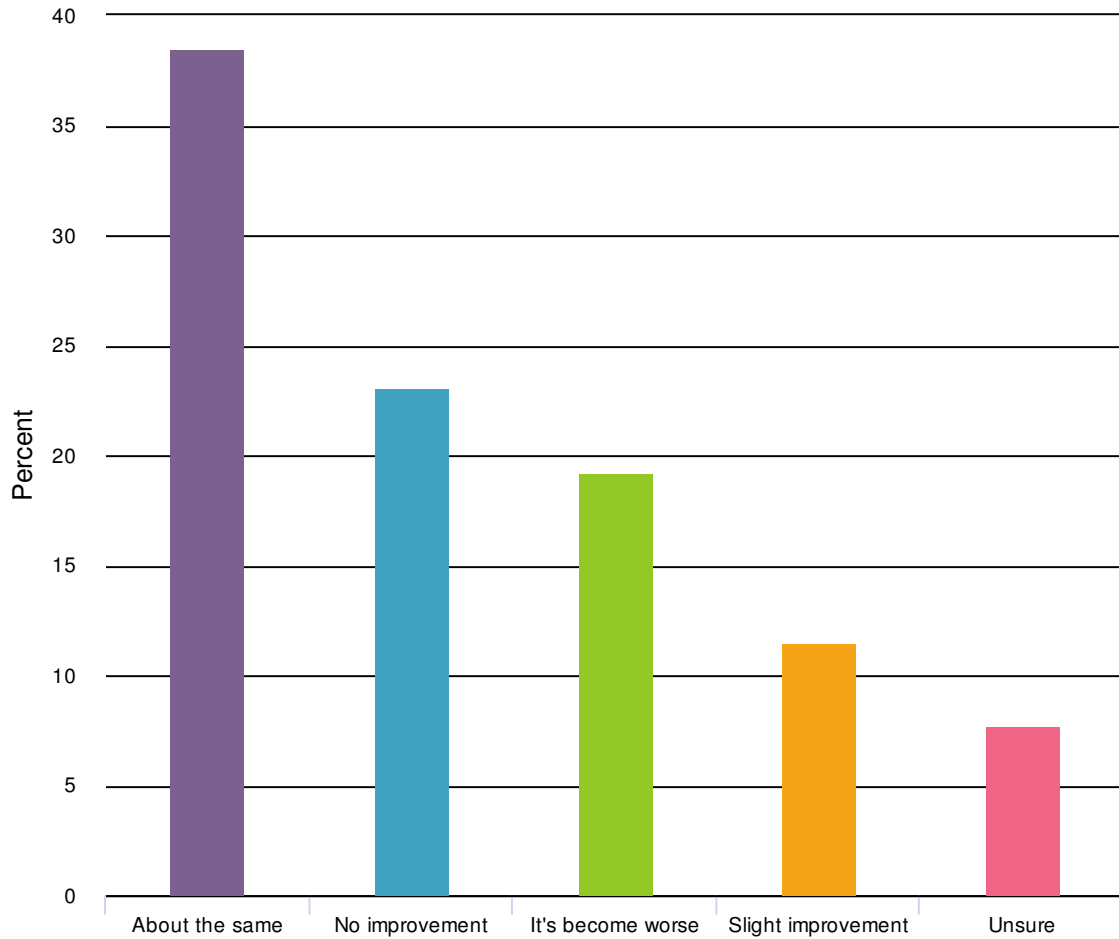
1. Do you believe there has been an improvement in the amount of dog fouling in Wyre?








Value	Percent	Responses
Slight improvement	26.9%	7
No improvement	26.9%	7
It's become worse	26.9%	7
About the same	15.4%	4
Unsure	3.8%	1

Totals: 26

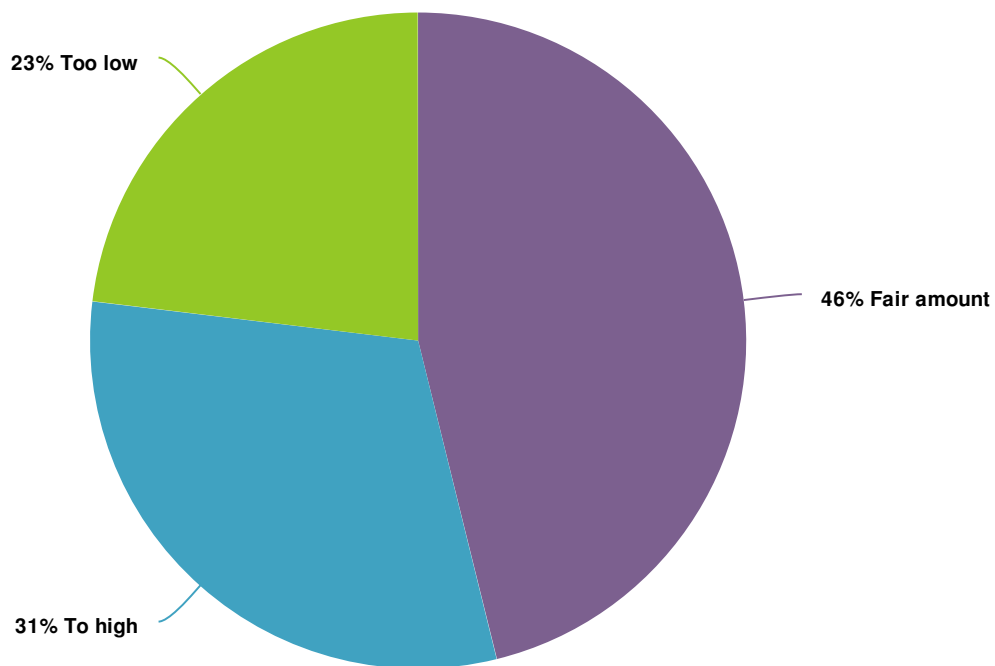
2. Do you believe there has been an improvement in the amount of litter (including cigarette litter) in Wyre?



Value		Percent	Responses
About the same		38.5%	10
No improvement		23.1%	6
It's become worse		19.2%	5
Slight improvement		11.5%	3
Unsure		7.7%	2

Totals: 26

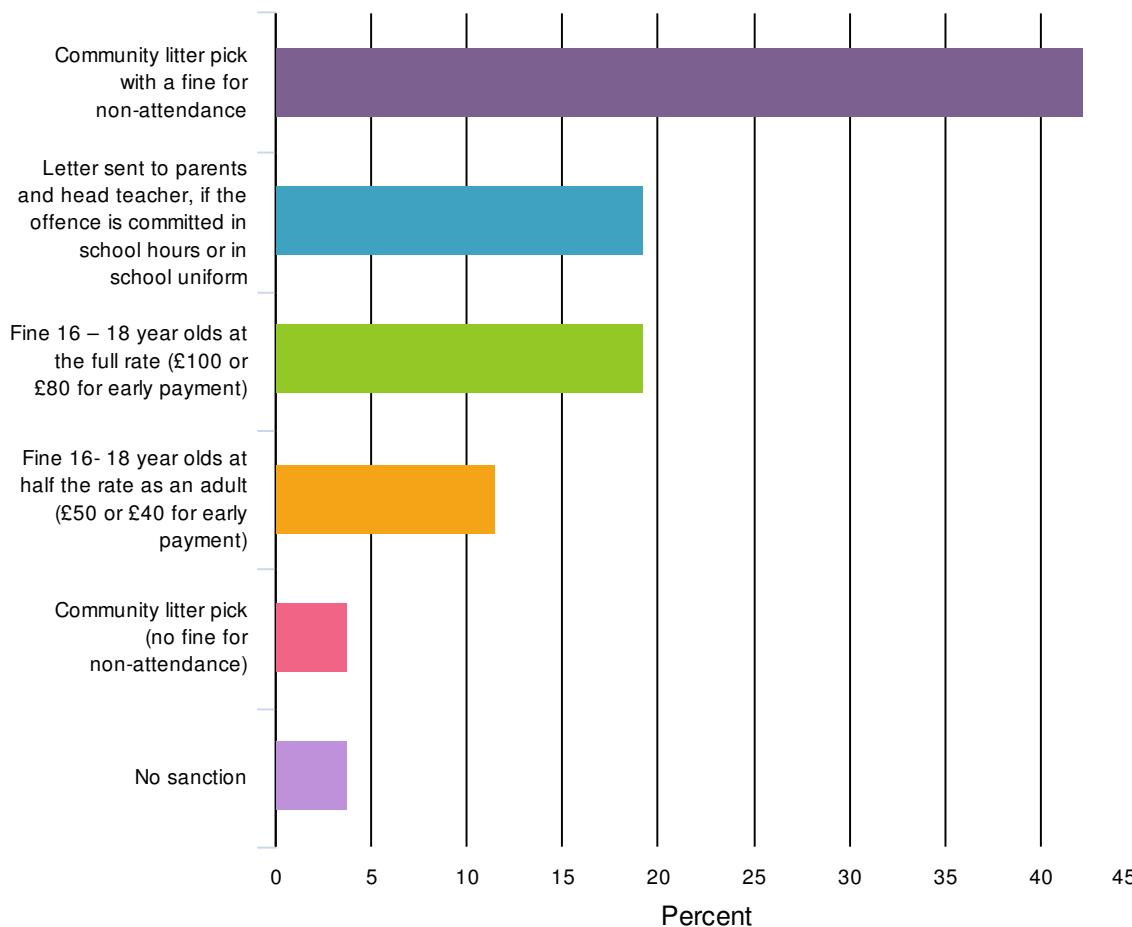
3. The maximum fine for a littering offence is set nationally at £150, however Wyre Council issues fines of £100 (£80 for early payment) which follows legislation guidelines. Do you believe this is the right level for a fine?



Value		Percent	Responses
Fair amount		46.2%	12
To high		30.8%	8
Too low		23.1%	6

Totals: 26

4. The council currently does not issue fines to under 18's but this position is being re-considered. What do you believe would be the most appropriate sanction for under 18 year olds?



Value	Percent	Responses
Community litter pick with a fine for non-attendance	42.3%	11
Letter sent to parents and head teacher, if the offence is committed in school hours or in school uniform	19.2%	5
Fine 16 – 18 year olds at the full rate (£100 or £80 for early payment)	19.2%	5
Fine 16- 18 year olds at half the rate as an adult (£50 or £40 for early payment)	11.5%	3
Community litter pick (no fine for non-attendance)	3.8%	1
No sanction	3.8%	1

Totals: 26

Other (please state)

Count

Totals

0

5. If you have been issued with a Financial Penalty Notice in the past year for an offence, as identified above, do you believe that the process was dealt with appropriately? (If you would like to make comments on how your case has been handled, details are on the bottom of your Financial Penalty Notice)



Value	Percent	Responses
Not applicable	84.6%	22
No	11.5%	3
Don't know	3.8%	1

Totals: 26

6. If you have answered “No” to Question 5, or if you have any other views about the enforcement scheme, please comment below.



Count Response

1	Absolutely disgusting having to walk on streets and beaches where there is dog mess....
1	Enforcement operators act in a bullying and intimidating manner.
1	Most of the alleyways (gimmell) are a disgrace ..wrong items in bins ..so left for the sea gulls and the wind to create yet more litter
1	N/A
1	No good for operatives to be wearing hi viz clothes.Culprits see high viz jackets and obey the rules for once.
1	Seen them aggressive and intimidating outside Asda. Low life scum and the guy had took a tissue out of his pocket and did not even know a piece of paper has fallen out.
1	The enforcement officers target old and vulnerable people, they are rude and at time abusive. They should not be target led and/or be on commission per fine. The scheme should not be run by private companies.
1	There needs to be more dog bins around from Toronto ave to flakefleet school there is one bin at bus stop near school on the route there is always loads of rubbish in bushes all over floor plus dog poo everywhere it's disgusting
1	We had false claims of littering after paper fell out of our car with out or knowledge and still got a fine after we pickex it up after it was pointed out too us and complained about this , the process it's unfair ,biased and all about targets in doing so there is clear victimisation against local people and putting them off going into local shopping areas

This page is intentionally left blank

J:\Sssu\Committee\SCRUTINYO&S2021-2022\Task Groups\District Enforcement recommissioned\09.11.2021 meeting\20200213 District Enforcement in house figures.xlsx\Workings

Estimate working paper to consider the financial implications of bringing a 'District Enforcement' (DE) comparable service in-house

In house service example

Estimated Income (based on 5,346 FPNs per annum)

5,346 FPN issued	75% payment rate (4,009)	£
	602 (15%) paid at £100	-60,200
	3,407 (85%) paid at £80	-272,560
	Estimated Income based on 75% collection rate	-332,760

	<u>Hours pw</u>	<u>Salary</u>	<u>33.5% oncosts</u>	<u>Total</u>		
		£	£	£		
Estimated Core Employee Costs						
Supervisor/Grade 9	37 hrs	32,878	11,010	43,888	No posts have been Job Evaluated. Suitable comparators have been used.	
Snr EEO/Grade 7	37 hrs	26,317	8,820	35,137		
EEO/Grade 6	37 hrs	24,313	8,140	32,453		
EEO/Grade 6	37 hrs	24,313	8,140	32,453		
EEO/Grade 6	37 hrs	24,313	8,140	32,453		
EEO/Grade 6	37 hrs	24,313	8,140	32,453		
Admin Officer/Grade 5	37 hrs	21,116	7,070	28,186		
Admin Clerk/Grade 2	37 hrs	18,065	6,050	24,115		
PT Admin Clerk/Grade 2	18.5 hrs	9,033	3,030	12,063		
Legal Services/Grade 13	18.5 hrs	22,796	7,640	30,436		As below.
PT Legal Services/Grade 8	18.5 hrs	14,818	4,960	19,778		Difficult to quantify - DE offer legal pack services as part of their contract.
Sub-Total				323,414		

Estimated Additional Employee Costs	£	£	
Initial Training Costs	1,400 x 10 staff	14,000	Known for high staff turnover, additional costs would be incurred training each new recruit.
O/T provision		13,420	Based on % overtime spend in 2018/19 against salaries on 3420 Street Cleansing.
Staff subsistence		100	
Agency Cover provision	125 per day	6,250	based on £125 for 50 days per annum
Sub-Total		33,770	

Estimated Supplies and Services Costs	Qty	£	
Managed Office Accomodation		5,760	(Based on Civic Centre)
Insurance (Employee and vehicle)		1,520	
Electric Vehicle	1	2,357	See notes below.
Vehicle running costs		1,140	
System licence fee		2,000	Cost unknown - based on other licence fees paid.
PC/Phones (recharges)	5	3,235	
Uniform @ £250	5	1,250	
EDA @ £695	1	695	
Body Camera @ £530	1	530	
Stationery, printing and general office equipment		500	
Collected payments @ 75p ea	5,346	4,010	
Till Roll @ 2p ea	5,346	107	
ID Checks @ 65p ea	5,346	3,475	
Paper/Postage @ £1 ea	5,346	5,346	
Sub-Total		31,924	

Total Estimated Costs **389,108**

Annual Estimated Net Income (excluding implementation costs) **56,348**

Estimated Implementation Costs	Qty	£
Back office system		20,000
Uniform @ £250	15	3,750
EDA @ £695	5	3,475
Spare EDA	1	695
Body Camera @ £530	5	2,650
Spare Body Camera	1	530
Desk	5	550
Chair	5	545
General office equipment		1,000
PC/Phones (initial purchase)	5	2,800
Sub-Total		35,995

Yr One Estimated Net Expenditure including implementation costs **92,343**

Note: No provision for court costs/other legal implications beyond those identified above have been included.
 No provision for promotion of the service has been included above. One new vehicle has been assumed would be required and this would drop-off/pick up, up to three staff per day as not all five would be on duty.
 Use of a pool vehicle may be necessary at times e.g. when servicing is required but this is not included above.
 The purchase price for an electric vehicle is estimated to be £21,500. This has been apportioned over a seven year period and assumes £5,000 residual value at the end. Grant funding may be available to offset this.
 Costs above are based on 5,346 FPNs. No allowance has been included for cancelled FPNs.)

Current Service Comparison

Estimated Income (based on 5,346 FPNs)

5,346 FPN issued	75% payment rate	£
	602 (15%) paid at £100	-60,200
	3,407 (85%) paid at £80	-272,560
	Estimated Income based on 75% collection rate	-332,760

Income to Council **-41,595** (based on 12.5% of income)

This page is intentionally left blank

District Environmental Enforcement Task Group- Lancashire responses							
	Blackburn with Darwen	Blackpool	Burnley	Hyndburn	Pendle	Preston	Ribble Valley
<p>List of enforcements made by District:</p> <ol style="list-style-type: none"> Littering (including cigarette litter) Failing to have the means to pick-up Dogs encroaching into an exclusion zone Dog fouling not being removed/disposed Dogs not on leads in Public Places 	<p>October 2018 to October 2019: Littering (including cigarette litter) = 2919 1. Failing to have the means to pick-up = not in our PSPO 2. Dogs encroaching into an exclusion zone = 0 3. Dog fouling not being removed/disposed = 14 4. Dogs not on leads in Public Places = 17 (only applies to cemeteries) 5. Also 324 Smoke-Free England</p>	/	<p>Litter-3497 Dog exclusion- 6 Fouling- 71 Dogs on leads- 1</p>	<p>Currently we have one dog warden who enforces any dog related issues, we also have one waste enforcement officer who deals with littering, flytipping and abandoned vehicles etc.</p>	<p>We have our own in house Enforcement Team who mainly deal with fly tipping and have 190 actions</p> <p>FPN's Flytipping 39 FPN's Duty of Care Business 2 FPN's Duty of Care householder 110 FPN's Littering 22 FPN's Littering from vehicle 4 PSPO Dog fouling 7 PSPO Dog not on lead 1</p>	/	<p>1. 6 2. 0 3. . 4. 2 5. 1</p>
<p>Is the service ran in house or outsourced</p>	<p>Outsourced (LA Support Ltd).</p>	<p>All Blackpool Council enforcement activities are now carried out by Council officers. A trial was conducted a couple of years ago using an outside enforcement company and a significant number of Fixed Penalty Notices were issued. A significantly high proportion of the penalty notices issued were for cigarette litter. Unfortunately the trial did not yield the environmental improvements that were sought and the trial was concluded.</p> <p>The biggest challenge in Blackpool is fly tipping in back streets. Fixed Penalty Notices are regularly issued for this type of offence. Blackpool has Enforcement Officers working in the more problematical inner wards concentrating their efforts on reducing this type of offence.</p>	<p>outsourced to Kingdom but Park Rangers can also issue FPN's</p>	<p>All our enforcement was put on hold at the beginning of the pandemic and kingdoms contract was not renewed, all my enforcement team were deployed on to other duties within the council.</p> <p>We have written a new enforcement policy however, it will be up to members to vote if they would like this back in place, if they do I would have thought it would be April 2022 before this is back up and running at the earliest</p>	<p>then for littering and dog fouling this has been outsourced since February 2019 and so far they have 4625 actions which are:</p> <p>FPNS Dog fouling 112 FPNs Littering 4485 (3683 cigarette related litter) Warnings Dog Fouling 1, Littering 28</p>	<p>Our enforcement staff are all inhouse. We only have 2 Waste Enforcement Officers and 1 Dog Officer. The waste officers deal with littering, flytipping and other waste related issues on the highway and our land only. The dog officer deals with fouling etc. Our 3 park rangers have also been trained to respond to dog control order issues. Environmental Health staff deal with all waste issues on private property.</p>	<p>In house. Nothing is outsourced</p>
<p>The frequency and amount of FPN's given</p>	<p>see above</p>	<p>This financial year the Environmental Operations Enforcement Team have issued 270 Fixed Penalty Notices for littering, fly tipping or dog related offences.</p>	<p>see above</p>			<p>We issued 29 littering fpons in 2019.</p>	<p>Around 5/6 FPNs a year</p>
<p>How they tackle environmental crimes committed by under 18's</p> <p>Page 95</p>	<p>We've struggled with under 18's; with 16-18 year olds we send warning letters where they can prove their age; if they can't prove their age they are issued and FPN and we cancel when they show us satisfactory proof of age. With under 16's we will engage with schools where viable.</p>	<p>Environmental Crimes committed by under 18's is always an issue that requires careful consideration. The preference is usually to write to the young person's parents/guardian and raise the matter with them first. An Enforcement Officer may choose to visit the home address and discuss the matter further with the parent/guardian in the presence of the young person.</p> <p>On rare occasions the young person has been asked to carry out litter picking as reparation for the crime committed. I hasten to add this is on very rare occasions!</p> <p>Ultimately an under 18 would be issued with a Fixed Penalty Notice if the circumstances dictated.</p>	<p>don't issue</p>		<p>Under 18's and disabled are given warnings not FPNs</p>	<p>With regards under 18's our policy states</p> <p>7.1.4 FPNs issued to young people will be issued with due regard to the Children Act 2004 and the Department for Environment, Food and Rural Affairs guidance on issuing fixed penalties notices to juveniles.</p> <p>Notices may be issued to 16 and 17 year olds using the same procedures as for adults. However, authorised officers will consider whether a written warning is appropriate for a first offence, depending upon the nature and seriousness of the offence.</p> <p>In most circumstances a written warning will be issued to the parents of a child under the age of 16 in the first instance. If the offence occurs in school hours or in school uniform an advisory letter will be sent to the Head Teacher.</p> <p>If the child continues to offend, despite this intervention, enforcement action (including a Fixed Penalty Notice) may be taken following discussions with relevant local agencies responsible for law enforcement and children's services. (e.g. Police, Youth Service, Youth Offending Team). The Council will consult with partners to determine whether a FPN is the most appropriate measure for a person under 16 or if other measures (e.g. warnings; Acceptable Behaviour Contract) are more appropriate.</p> <p>In all circumstances the parent or legal guardian will be advised as soon as possible.</p>	<p>Nothing extra in place</p>
<p>Any other arrangements when fining people with disabilities</p>	<p>People with disabilities are not issued an FPN where it is clear their disability affects their ability to pick up litter. Where this isn't the case we will take a balanced view on receiving a representation (but err on the side of caution in favour of the recipient).</p>	<p>Enforcement activities involving disabled individuals are dealt with on a case by case basis. The nature of the disability determines how the case is managed. It has been necessary to engage with Social Services to assist or support the individual historically where it is evident the disabled individual is unable to comply with the request made by the Enforcement Officer. The above is relevant to littering or fly tipping</p> <p>The PSPO (Dog Control) has a number of exclusions listed that are recognised disabilities and allow the individual not to comply with the requirements of the PSPO, however, the exclusions tend to be limited to service dogs or support dogs.</p> <p>It is always the officers judgement whether or not to issue a Fixed Penalty Notice. The right of appeal exists and is explained to the offender at the time the notice is issued.</p>	<p>dealt with on a case by case basis</p>	/		<p>I am not aware of a difference in position from normal regarding disable people.</p>	<p>Not to consider</p>
<p>Other information</p>	/	<p>Littering is dealt with by way of Fixed Penalty Notice should it be witnessed by an authorised Council officer. Littering from vehicles is a different process which we are looking to introduce very soon. The offence is dealt with as a Civil matter not Criminal and involves a tribunal instead of a Magistrates Court.</p> <p>Blackpool re visited their PSPO for dog ownership and made a number of changes to the previous arrangements.</p> <p>Failing to have the means to pick is normally dealt with by way of Fixed Penalty Notice, however, a warning is more likely to be issued if it is the first occasion where a dog walker/owner has been challenged.</p> <p>Dogs encroaching into an exclusion zone would also be dealt with by way of warning but dependent upon how receptive the dog owner/walker was would determine whether or not a penalty notice is issued.</p> <p>Failure to pick up which was witnessed by an Authorised Officer is always a Fixed Penalty Notice.</p> <p>Dogs not on lead in public places would again be dealt with by a warning, however, dependent upon how the dog owner/walker reacted would determine whether or not a Fixed Penalty Notice would be issued.</p>	<p>Most litter offenses are caused by cigarettes.</p>	<p>The contract with kingdomd esd not renewed.</p>	/	<p>I have been in discussion with the companies that carry out enforcement to consider what they could off ourselves. We are yet to put to confirm what we will do</p>	

District Environmental Enforcement Task Group- CIPFA family group responses														
	North East Derbyshire	Lewes	South Staffordshire	Dover	Lancaster	North Devon	North Norfolk	Wyre Forest	Sedgemoor	South Ribble	Teignbridge	Amber Valley	Hinckley and Bosworth	East Suffolk
List of enforcements made by District: 1. Littering (including cigarette litter) 2. Failing to have the means to pick-up 3. Dogs encroaching into an exclusion zone 4. Dog fouling not being removed/disposed 5. Dogs not on leads in Public Places	From 1/9/2020 – 1/9/2021: *These figures have been significantly affected by COVID 19 as the number of officer patrols were restricted. 1. 0 2. 0 3. 0 4. 1 5. 0			/	1. Yes 2. No 3. Yes 4. Yes 5. Yes – Public highways and designated on lead areas only.		/				See below			1. 2019-220 2020-143 2. / 3. 2019-4 2020-1 4. 2019-146 2020-107 5. 2019-12 2020-6
Is the service ran in house or outsourced	In house			As discussed we had been part of a one year pilot scheme with District Enforcement whereby they provided uniformed enforcement officer to patrol our district and serve fixed penalty notices for littering and dog fouling offences. The service delivered was very good at the end of the years pilot with experienced officers who worked well with our inhouse team. We took the decision to extend the years pilot however unfortunately when the pandemic hit District Enforcement took the decision to end their pilot with us. Should the pandemic not have occurred I am sure we would still have been working with District Enforcement now and would have been able to answer the questions you have asked.Following this we have established that a combined approach of inhouse and contracted enforcement officers works in our district. The contracted officers focused on littering and dog fouling patrols which enabled our in house environmental enforcement officer and dog warden to focus more time on investigation or case work such as fly tipping, dangerous dogs, etc	In house			We operate and process environment offences in house at WFDC and operate and install our own covert cameras for fly tipping offences.			Enforcement is in house			Outsourced
If it is outsourced what company does the council use?	/			/	/		/	/						Norse
The frequency and amount of FPN's given	Enforcement officers will issue a fixed penalty where an offence is witnessed, and it is appropriate to do so	No response	No response		5 in 2021 – Littering £80 - £50 early payment 12 Dog related offences £100 or £75 early payment			Litter FPN for last 12 months. This is the amount for actual FPN issued and we have approximately 25 cases pending from information requests. September 2020 – 11 October 2020 – 20 November 2020 – 25 December 2020 – 6 January 2021 – 12 February 2021 – 12			1st October 2018-31stOctober 2019. During that time, we issued 55 FPNs, broken down as follows:- 1-Littering (including cigarette litter)-36 2-Dog fouling not being remove/disposed-6 3-Fly Tipping-9 4-No Waste Transfer Notes-2 5-Dogs not on lead alongside highway-1 6-More than six dogs being walked by one person-1 We did not issue any FPNs in respect of "Failing to have the means to pick up" or "Dogs encroaching into an exclusion zone"			2020-62 2019-79
How they tackle environmental crimes committed by under 18's	Officers would seek to engage the offender's parents/legal guardian.				Littering – no under 18's issued FPNs. If we find out the parents details, we will speak to them. Dog related offences also as above, with potential to issue a CPW on parents for repeat offenders (not happened yet).			We don't usually process cases with subjects under 18 however we have had previous cases relating to ASB whereby we have issued Community Protection Warnings to the parents. Due to a change in legislation we can no longer do this.			When we deal with environmental crimes committed by under 18s, we conduct the interview in the presence of parent/guardian.			
Any other arrangements when fining people with disabilities	There are no specific arrangements. Officers assess the situation and issue fixed penalties where reasonable and appropriate to do so.			As a result we have recently conducted a tendering process for a three year contract with a contractor to provide 3 uniformed enforcement officers so that this combined approach can be continued.	Dependant on disability – if it is a severe disability we will not proceed – but may liaise with carers. Dependant on what the defence offered is for dog related offences, but there is scope for a lesser sanction.			Regarding disabilities – the range of disabilities can vary significantly and it is very rare to encounter somebody who is not able to understand or provide their name and address etc. We have approached people that have failed to pick up their dog faeces because they have claimed they can not bend down etc however the only exception is if they are registered blind. Each case is measured on a individual basis.			When dealing with people with disabilities, we make "reasonable adjustments" depending on the circumstances.			



Report of:	Meeting	Date
Councillor Michael Vincent, Resources Portfolio Holder and Clare James, Corporate Director Resources	Cabinet	23 March 2022

<p>Treasury Management Policy Statement and Practices, Treasury Management and Annual Investment Strategy, Minimum Revenue Provision Policy Statement and Capital Strategy 2022/23</p>

1. Purpose of report

1.1 To set out the policies and objectives of the council in respect of Treasury Management activities, to explain how the council seeks to achieve the objectives and manage and control the activities for 2022/23 which includes the Capital Strategy.

2. Outcomes

2.1 A Policy Statement, Statement of Treasury Management Practices, Treasury Management and Annual Investment Strategy, a Minimum Revenue Provision (MRP) Policy Statement and a Capital Strategy.

3. Recommendations

3.1 To recommend to Council that the Treasury Management Policy Statement 2022/23 be approved and formally adopted. (Appendix 1).

3.2 To approve the revised Treasury Management Practices 2022/23 (Appendix 2).

3.3 To recommend to Council that the Treasury Management and Annual Investment Strategy 2022/23 (Appendix 3) be approved.

3.4 To recommend to Council that the MRP Policy Statement 2022/23 (Appendix 4) be approved and formally adopted.

3.5 To recommend to Council that the Capital Strategy 2022/23 (Appendix 5) be approved.

4. Background

- 4.1** The report has been prepared in accordance with the Revised CIPFA Treasury Management Code 2021.
- 4.2** Under the updated Prudential Code 2021, CIPFA continues to require councils to publish a Capital Strategy (see Appendix 5). Guidance on the form and content of the Capital Strategy was published in 2021 with the emphasis shifting to a whole organisation approach and as such the current strategy represents an evolving document. This approach is in line with CIPFA's expectations and the understanding that all councils will be working towards developing their own strategies over time to meet local needs.
- 4.3** The Capital Strategy is designed to demonstrate that the council takes capital expenditure and investment decisions in line with service objectives and properly takes account of stewardship, value for money (VFM), prudence, sustainability and affordability. The strategy is intended to set out the long-term context in which capital expenditure and investment decisions are made and gives due consideration to both risk and reward and the achievement of priority outcomes. Long-term is not defined and beyond the current Medium Term Financial Planning period, there is little detail or certainty within the current strategy, particularly taking into account the current funding reform context. As greater clarity is achieved nationally, it is expected that further iterations of the strategy will become more detailed and longer-term.
- 4.4** Owing to the interrelatedness of the Treasury Management framework and the Capital Strategy, there is a good deal of overlap between the two documents and potential for duplication. Efforts have been made to streamline the Capital Strategy and cross-reference to existing Treasury Management documents where possible in order to reduce repetition.
- 4.5** In January 2021 a Treasury Management Q&A document was circulated to the Overview and Scrutiny Committee to enable them to scrutinise the Council's strategy and policies and in February 2022 all members were offered Treasury Management Training from Link Asset Services.

5. Key issues and proposals

- 5.1** The Local Government Act 2003 requires the council to have regard to the Prudential Code and to set Prudential Indicators for the next three years. The 2022/23 Prudential Indicators were considered by Cabinet at their meeting on 16 February 2022 and are due to be approved at the Council meeting on 23 March 2022.
- 5.2** The key objective of the Prudential Code is to ensure, within a clear framework, that the capital investment plans of local authorities are affordable, prudent and sustainable. In exceptional cases, its purpose may

be to demonstrate that that there is a danger of not ensuring this, so that the authority concerned can take remedial action.

5.3 In order to demonstrate compliance with the CIPFA Code of Practice for Treasury Management, the Council must approve a Policy Statement, Treasury Management Practices, a Treasury Management and Investment Strategy, an MRP Policy Statement and a Capital Strategy setting out how the council will seek to achieve its Treasury Management policies, together with details of how these activities are managed and controlled.

5.4 It is also a requirement of the Code of Practice that the full Council agrees the Treasury Management and Annual Investment Strategy, the MRP Policy Statement and the Capital Strategy for the forthcoming financial year. The 2022/23 Strategies and MRP Policy Statement are attached at Appendix 3, 4 and 5.

Financial and legal implications	
Finance	There are no direct financial implications arising from the adoption of the Treasury Management Policy Statement and Treasury Management Practices. The Prudential Code allows capital investment to proceed within prudent limits where the council can fund it from its own resources and external revenue streams.
Legal	The approval of the recommendation will ensure that the CIPFA Code of Practice on Treasury Management and statutory requirements have been complied with.

Other risks/implications: checklist

If there are significant implications arising from this report on any issues marked with a ✓ below, the report author will have consulted with the appropriate specialist officers on those implications and addressed them in the body of the report. There are no significant implications arising directly from this report, for those issues marked with a x.

risks/implications	✓ / x
community safety	x
equality and diversity	x
sustainability	x
health and safety	x

risks/implications	✓ / x
asset management	x
climate change	x
ICT	x
data protection	x

Processing Personal Data

In addition to considering data protection along with the other risks/ implications, the report author will need to decide if a 'privacy impact assessment (PIA)' is also required. If the decision(s) recommended in this report will result in the collection and processing of personal data for the first time (i.e. purchase of a new system, a new working arrangement with a third party) a PIA will need to have been completed and signed off by Data Protection Officer before the decision is taken in compliance with the Data Protection Act 2018.

Report author	Telephone no.	Email	Date
Ben Ralphs	01253 887309	ben.ralphs@wyre.gov.uk	25/02/2022

List of background papers:		
name of document	date	where available for inspection
None		

List of appendices

- Appendix 1 - Treasury Management Policy Statement 2022/23
- Appendix 2 - Treasury Management Practices 2022/23
- Appendix 3 - Treasury Management Strategy and Annual Investment Strategy 2022/23
- Appendix 4 - Minimum Revenue Provision Policy Statement
- Appendix 5 - Capital Strategy

TREASURY MANAGEMENT POLICY STATEMENT 2022/23

Wyre Council defines its Treasury management activities as follows:

1. The management of the authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.
2. The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the organisation, and any financial instruments entered into to manage these risks.
3. The Council acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.

Clauses to be formally adopted

4. The council will create and maintain, as the cornerstones for effective treasury management:
 - A treasury management policy statement, stating the policies, objectives and approach to risk management of its treasury management activities, and;
 - Suitable treasury management practices (TMPs), setting out the manner in which the organisation will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.

The contents of the policy statement and TMPs will follow the recommendations contained in Sections 6 and 7 of the Code, subject only to amendment where necessary to reflect the particular circumstances of this organisation. Such amendments will not result in the organisation materially deviating from the Code's key principles.

5. The Council will receive reports on its treasury management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the year, a mid-year review and an annual report after its close, in the form prescribed in its TMPs.
6. The Council delegates responsibility for the implementation and regular monitoring of its treasury management practices to Cabinet, and for the execution and administration of treasury management decisions to the

Corporate Director of Resources, who will act in accordance with the organisation's policy statement and TMPs and CIPFA's Standard of Professional Practice on Treasury Management.

7. The Council nominates the Overview and Scrutiny Committee to be responsible for ensuring effective scrutiny of the treasury management strategy and policies (including the Capital Strategy).

TREASURY MANAGEMENT PRACTICES

2022/23

TREASURY MANAGEMENT PRACTICES

This section contains the schedules, which set out the details of how the Treasury Management Practices (TMPs) are put into effect by this organisation.

	Paragraph
TMP 1 Treasury risk management	1.1 - 1.9
TMP 2 Performance measurement	2.1 - 2.3
TMP 3 Decision - making and analysis	3.1
TMP 4 Approved instruments, methods and techniques	4.1 - 4.8
TMP 5 Organisation, clarity and segregation of responsibilities, and dealing arrangements	5.1 - 5.13
TMP 6 Reporting requirements and management information arrangements	6.1 - 6.9
TMP 7 Budgeting, accounting and audit arrangements	7.1 - 7.4
TMP 8 Cash and cash flow management	8.1 - 8.6
TMP 9 Money laundering	9.1 - 9.6
TMP 10 Training and qualifications	10.1 - 10.7
TMP 11 Use of external service providers	11.1 - 11.2
TMP 12 Corporate governance	12.1

TMP1 TREASURY RISK MANAGEMENT

The responsible officer will design, implement and monitor all arrangements for the identification, management and control of treasury management risk, will report at least annually on the adequacy/suitability thereof, and will report, as a matter of urgency, the circumstances of any actual or likely difficulty in achieving the organisation's objectives in this respect, all in accordance with the procedures set out in TMP6 Reporting Requirements and Management Information Arrangements. In respect of each of the following risks, the arrangements which seek to ensure compliance with these objectives are set out below.

1.1 Credit and Counterparty Risk Management

Credit and counterparty risk is the risk of failure by a counterparty to meet its contractual obligations to the organisation under an investment, borrowing, capital project or partnership financing, particularly as a result of the counterparty's diminished creditworthiness, and the resulting detrimental effect on the organisation's capital or current (revenue) resources.

The council regards a key objective of its treasury management activities to be the security of the principal sums it invests. Accordingly, it will ensure that its counterparty lists and limits reflect a prudent attitude towards organisations with whom funds may be deposited, and will limit its investment activities to the instruments, methods and techniques referred to in TMP4 Approved Instruments Methods and Techniques. It also recognises the need to have, and will therefore maintain, a formal counterparty policy in respect of those organisations from which it may borrow, or with whom it may enter into other financing arrangements.

1.1.1 Policy on the use of credit risk analysis techniques

The council applies the creditworthiness service provided by Link Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following overlays:

- credit watches and credit outlooks from credit rating agencies;
- Credit Default Swaps (CDS) spreads to give early warning of likely changes in credit ratings;
- Sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the council to determine the suggested duration for

investments. The council will therefore use counterparties within the following durational bands: -

- Yellow 5 years (only Local Authorities)
- Dark Pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.25
- Light Pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.5
- Purple 2 years
- Blue 1 year (only applies to nationalised or part-nationalised UK Banks)
- Orange 1 year
- Red 6 months
- Green 100 days
- No colour Not to be used

1. A weekly colour coded Credit Listing is provided by email from our Treasury Management consultants and this is supplemented with emails regarding all changes in credit ratings as and when they occur. These documents are saved within the Cash flow folder.
2. These documents will be reviewed by treasury management staff in line with the policy on criteria for selection of counterparties for use by the responsible officer making investments on a daily basis.
3. Ratings will not be the sole determinant of the quality of an institution. In addition to the credit ratings the assessment will also take account of information that reflects the opinion of the markets. Other information sources will include:
 - The financial press
 - Share price
 - Information pertaining to the banking sectorSole reliance will not be placed on the use of these external sources. The council will also use market data and market information, information on sovereign support for banks and the credit ratings of that supporting government.
4. Diversification: this organisation will avoid concentrations of lending and borrowing by adopting a policy of diversification. It will therefore use the following:
 - Maximum amount to be placed with any one institution – higher of £6m or 20% of investment balances.
 - Group limits where a number of institutions are under one ownership – maximum of £6m or 25% of investment balances, whichever is higher.
 - Country limits – excluding UK, a minimum sovereign rating of AA- from Fitch (or equivalent) is required.

5. Investments will not be made with counterparties that do not have a credit rating in their own right, except for Local Authorities. As part of our Treasury Management Consultants credit methodology UK Local Authorities are assigned a colour band 'yellow' (5 years).
6. Maximum maturity periods and amounts to be placed in different types of institutions are in Schedule 1 as follows:

TMP 1 SCHEDULE 1 – SPECIFIED AND NON SPECIFIED INVESTMENTS

The Guidance and CIPFA TM Code distinguishes between specified and non-specified investments, as follows:

- **Specified Investments:** All such investments will be sterling denominated, with maturities up to a maximum of 1 year, meeting the minimum 'high' quality criteria (organisations included with the following colour codings on Link's weekly Credit List also available online) where applicable.
- **Non-specified Investments:** These are investments which do not meet the Specified Investment criteria.

A variety of investment instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made it will fall into one of the above categories.

The criteria, time limits and monetary limits applying to institutions or investment vehicles are:

Organisation	Minimum credit criteria / colour band	Max. Amount per Institution	Max. maturity Period
Term deposits with UK Clearing Banks and UK Building Societies	Purple	£6m or **	Up to 2 years
	Blue	£6m or **	Up to 1 year*
	Orange	£6m or **	Up to 1 year
	Red	£6m or **	Up to 6 months
	Green	£6m or **	Up to 100 days
Term deposits with Other Banks	Orange	£6m or **	Up to 1 year
	Red	£6m or **	Up to 6 months
	Green	£6m or **	Up to 100 days
Certificates of Deposit with UK Clearing Banks and UK Building Societies	Purple	£6m or **	Up to 2 years
	Blue	£6m or **	Up to 1 year*
	Orange	£6m or **	Up to 1 year
	Red	£6m or **	Up to 6 months
	Green	£6m or **	Up to 100 days

*Part Nationalised banks (per 1.1.1).

**£6m or 20% of investment balance per individual counterparty or 25% per whole counterparty group whichever is higher.

Organisation	Minimum credit criteria / colour band	Max. Amount per Institution	Max. maturity Period
UK Local Authorities	Yellow	£6m or ** £6m or **	Up to 5 years Up to 1 year
Ultra-Short Dated Bond with credit score of 1.25	Dark Pink / AAA	£6m or **	liquid
Ultra-Short Dated Bond with credit score of 1.5	Light Pink / AAA	£6m or **	liquid
Money Market Funds - CNAV, LVNAV or VNAV	AAA	£6m or **	liquid

**£6m or 20% of investment balance per individual counterparty or 25% per whole counterparty group whichever is higher.

1.2 Liquidity Risk Management

This is the risk that cash will not be available when it is needed, that ineffective management of liquidity creates additional unbudgeted costs, and that the organisation's business/service objectives will therefore be compromised.

The council will ensure it has adequate though not excessive cash resources, borrowing arrangements, overdraft or standby facilities to enable it at all times to have the level of funds available to it which are necessary for the achievement of its business/service objectives. The council will only borrow in advance of need where there is a clear business case for doing so and will only do so for the current capital programme or to finance future debt maturities.

1.2.1 Amounts of approved minimum cash balances and short-term investments

The Treasury Management section shall seek to minimise the balance held in the council's main bank accounts at the close of each working day. Borrowing or lending shall be arranged in order to achieve this aim.

1.2.2 Details of:

a) Standby facilities

The council's bank (NatWest) has a facility whereby at the end of each day any surplus funds are transferred to an Investment Account/Call Account.

b) Bank overdraft arrangements

The council has reviewed the cost effectiveness of operating an agreed overdraft and has decided not to have such an arrangement in place. If the group bank account does become overdrawn there will be a charge of 4% over the base rate.

c) Short-term borrowing facilities

The council accesses temporary loans through approved brokers on the London money market. The approved borrowing limit for short term debt is £13.452m.

d) Insurance/guarantee facilities

There are no specific insurance or guarantee facilities as the above arrangements are regarded as being adequate to cover all unforeseen occurrences.

1.3 Interest Rate Risk Management

There is a risk that fluctuations in the levels of interest rates would create an unexpected or unbudgeted burden on the organisation's finances, against which the organisation has failed to protect itself adequately.

The council will manage its exposure to fluctuations in interest rates with a view to containing its interest costs, or securing its interest revenues, in accordance with the amounts provided in its budgetary arrangements as in accordance with TMP6 Reporting Requirements and Management Information Arrangements.

It will achieve this by the prudent use of its approved financing and investment instruments, methods and techniques, primarily to create stability and certainty of costs and revenues, but at the same time retaining a sufficient degree of flexibility to take advantage of unexpected, potentially advantageous changes in the level or structure of interest rates.

1.3.1 Details of approved interest rate exposure limits

The Treasury Indicators for 2022/23 include a figure of £20.1 million for External Debt – Authorised Limit.

1.3.2 Trigger points and other guidelines for managing changes to interest rate levels

The Treasury Indicators for 2022/23 include a figure of £13.502 million for External Debt – Operational Boundary.

1.3.3 Limits for fixed and variable interest rate exposures

The Prudential Code, revised in 2021, does not require limits to be set for variable and fixed interest rate exposures. However the council does provide a limit as part of its Treasury Management indicators and this is considered when making new borrowing/investment decisions.

1.3.4 Policies concerning the use of instruments for interest rate management

- a) Forward dealing**
Consideration will be given to dealing from forward periods dependent upon market conditions. Forward dealing requires the approval of the Corporate Director of Resources.
- b) Callable deposits:**
The council will not use callable deposits as part of its Annual Investment Strategy.
- c) LOBO's (borrowing under lender's option/borrowers option):**
Use of LOBO's are not considered as part of the annual borrowing strategy. All borrowing for periods in excess of 364 days requires the approval of the Corporate Director of Resources.

1.4 Exchange Rate Risk Management

The risk that fluctuations in foreign exchange rates create an unexpected or unbudgeted burden on the organisation's finances, against which the organisation has failed to protect itself adequately.

The council will manage its exposure to fluctuations in exchange rates so as to minimise any detrimental impact on its budgeted income/expenditure levels.

1.4.1 Approved criteria for managing changes in exchange rate levels

- a)** As a result of the nature of the council's business, the council may have an exposure to exchange rate risk from time to time. This will mainly arise from the receipt of income or the incurring of expenditure in a currency other than sterling. The council will eliminate all foreign exchange exposures as soon as they are identified.
- b)** Where there is a contractual obligation to receive income or make a payment in a currency other than sterling at a date in the future, forward foreign exchange transactions will be considered after taking professional advice. Unexpected receipt of foreign currency income will be converted to sterling at the day's rate on which the currency was received. Where the council has a contractual obligation to make a payment in the same currency at a date in the future, then the currency may be held on deposit to meet this expenditure commitment.

1.5 Inflation Risk Management

The council will keep under review the sensitivity of its treasury assets and liabilities to inflation, and will seek to manage the risk accordingly in the context of the whole council's inflation exposures.

1.6 Refinancing Risk Management

The risk that maturing borrowings, capital, project or partnership financings cannot be refinanced on terms that reflect the provisions made by the organisation for such refinancing, both capital and current (revenue), and/or that the terms are inconsistent with prevailing market conditions at the time.

The council will ensure that its borrowing, private financing and partnership arrangements are negotiated, structured and documented, and the maturity profile of the monies so raised are managed, with a view to obtaining offer terms for renewal or refinancing, if required, which are competitive and as favourable to the organisation as can reasonably be achieved in the light of market conditions prevailing at the time.

It will actively manage its relationships with its counterparties in these transactions in such a manner as to secure this objective, and will avoid overreliance on any one source of funding if this might jeopardise achievement of the above.

1.6.1 Debt/Other Capital Financing, Maturity Profiling, Policies and Practices

The council will establish through its Prudential and Treasury Indicators the amount of debt maturing in any year/period.

Any debt rescheduling will be considered when the difference between the refinancing rate and the redemption rate is most advantageous and the situation will be continually monitored in order to take advantage of any perceived anomalies in the yield curve. The reasons for any rescheduling to take place will include:

- a) the generation of cash savings at minimum risk;
- b) to reduce the average interest rate;
- c) to amend the maturity profile and/or the balance of volatility of the debt portfolio

All rescheduling will be reported to Cabinet as soon as possible after the debt rescheduling exercise.

1.6.2 Projected Capital Investment Requirements

The responsible officer will prepare a five year plan for capital expenditure for the council. The capital plan will be used to prepare a five year revenue budget for all forms of financing charges.

The definition of capital expenditure and long term liabilities used in the Code will follow recommended accounting practice as per the Code of Practice on Local Authority Accounting.

1.6.3 Policy Concerning Limits on Affordability and Revenue Consequences of Capital Financing

In considering the affordability of its capital plans, the council will consider all the resources currently available/estimated for the future together with the totality of its

capital plans, revenue income and revenue expenditure forecasts for the forthcoming year and the two following years and the impact these will have on council tax. It will also take into account affordability in the longer term beyond this four year period. (Section 7 of the Prudential Code gives examples of matters relevant to the consideration of affordability, although this is not an exhaustive list.)

1.6.4 Set Aside Capital Receipts

As the final mortgage was redeemed during 2013/14, the council no longer has any requirement to set aside a proportion of its receipts. All of the authority's capital receipts may now be used for either the redemption of debt or financing new capital expenditure as an alternative to new borrowing.

1.7 Legal and Regulatory Risk Management

The risk that the council itself, or an organisation with which it is dealing in its treasury management activities, fails to act in accordance with its legal powers or regulatory requirements, and that the organisation suffers losses accordingly.

The council will ensure that all of its treasury management activities comply with its statutory powers and regulatory requirements. It will demonstrate such compliance, if required to do so, to all parties with whom it deals in such activities. In framing its credit and counterparty policy under TMP1 Treasury Risk Management, it will ensure that there is evidence of counterparties' powers, authority and compliance in respect of the transactions they may effect with the organisation, particularly with regard to duty of care and fees charged.

The council recognises that future legislative or regulatory changes may impact on its treasury management activities and, so far as it is reasonably able to do so, will seek to minimise the risk of these impacting adversely on the organisation.

1.7.1 Legal and Regulatory Risk Management

References to Relevant Statutes and Regulations

The treasury management activities of the council shall comply fully with legal statute, guidance, Codes of Practice and the regulations of the council. These are as follows:

Statutes

Local Government Finance Act 1988 section 114 – duty on the responsible officer to issue a report if the Council is likely to get into a financially unviable position.

Requirement to set a balanced budget - Local Government Finance Act 1992 section 32 for billing authorities and section 43 for major precepting authorities.

Local Government Act 2003

S.I. 2003 No.2938 Local Government Act 2003 (Commencement No.1 and Transitional Provisions and Savings) Order 2003 13.11.03

S.I. 2003 No.3146 Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 and associated commentary 10.12.03

S.I. 2004 No.533 Local Authorities (Capital Finance) (Consequential, Transitional and Savings Provisions) Order 2004 8.3.04

S.I. 2004 No.534 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2004 8.3.04

S.I. 2004 no. 3055 The Local Authorities (Capital Finance and Accounting) (Amendment) (England) (No. 2) Regulations 2004

S.I. 2006 no. 521 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2006

S.I. 2007 no. 573 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2007

Local Government and Public Involvement in Health Act 2007 s238(2) – power to issue guidance; to be used re: MRP

S.I. 2008 no. 414 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2008

S.I. 2009 no. 321 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2009

S.I. 2009 no. 2272 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No.2) Regulations 2009

S.I. 2009 no. 3093 The Local Government Pension Fund Scheme (Management and Investment of Funds) Regulations 2009

S.I. 2010 no. 454 (Capital Finance and Accounting) (Amendment) (England) Regulations 2010

Localism Act 2011

S.I. 2012 no. 265 Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2012

S.I. 2012 No. 711 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No. 2) Regulations 2012

S.I. 2012 No. 1324 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No.3) Regulations 2012

S.I. 2012 No. 2269 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No. 4) Regulations 2012

S.I. 2013 No. 476 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2013

S.I. 2015 No. 234 Accounts and Audit Regulations 2015

S.I. 2017 no. 536 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2017

S.I. 2018 no. 1207 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2018

Statutory Guidance on Investments 2018

Statutory Guidance on MRP 2018

2019 No. 394 Exiting the European Union financial services: The Money Market Funds (Amendment) (EU Exit) Regulations 2019

S.I. 2019 no. 396 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2019

Guidance and codes of practice

CLG Revised Guidance on Investments 2018

CLG Guidance on minimum revenue provision – Feb 2012 updated 2018

CIPFA Treasury Management Code of Practice and Guidance Notes 2017

CIPFA Prudential Code for Capital Finance in Local Authorities 2018

CIPFA Treasury Management in the Public Services Guidance Notes 2018

CIPFA Statement 17.10.18 on borrowing in advance of need and investments in commercial properties
CIPFA Bulletin 02 Treasury and Capital Management Update October 2018
CIPFA Local Authority Capital Accounting - a reference manual for practitioners 2016 Edition
CIPFA Guide for Chief Financial Officers on Treasury Management in Local Authorities 1996
CIPFA Standard of Professional Practice on Continuous professional Development Revised 2013
CIPFA Statement of Professional Practice on Ethics 2018
The Good Governance Standard for Public Services 2004
LAAP Bulletins
IFRS - Code of Practice on Local Authority Accounting in the United Kingdom: A Statement of recommended Practice
PWLB circulars on Lending Policy
The Non-Investment Products Code (NIPS) - (formerly known as The London Code of Conduct) for principals and broking firms in the wholesale markets.
Financial Conduct Authority's Code of Market Conduct
The council's Standing Orders relating to Contracts
The council's Financial Regulations
The council's Scheme of Delegated Functions

1.7.2 Procedures for Evidencing the Council's Powers/Authorities to Counterparties

The council's powers to borrow and invest are contained in legislation.
Investing: Local Government Act 2003, section 12
Borrowing: Local Government Act 2003, section 1

In addition, it will make available on request the following: -

- i. the responsibilities and dealing arrangements in relation to treasury management activities which are contained in TMP5
- ii. the document that states which officers are the authorised signatories.

Required Information on Counterparties

Lending shall only be made to counterparties that comply with the council's Credit Worthiness Policy that is based upon the Link colour coded creditworthiness list and consideration of other market information including Country Sovereign ratings etc.

1.7.3 Statement on the Council's Political Risks and Management of Same

The Corporate Director of Resources shall take appropriate action with the council, the Chief Executive and the Leader of the council to respond to and manage political risks such as change of majority group, leadership in the council, change of Government etc.

1.7.4 Monitoring Officer

The monitoring officer is the Head of Governance and Business Support; the duty of this officer is to ensure that the treasury management activities of the council are lawful.

1.7.5 Chief Financial Officer

The Chief Financial Officer is the Corporate Director of Resources; the duty of this officer is to ensure that the financial affairs of the council are conducted in a prudent manner and to make a report to the council if they have concerns as to the financial prudence of its actions or its expected financial position.

1.8 Fraud, Error and Corruption, and Contingency Management

There is a risk that an organisation could fail to identify the circumstances in which it may be exposed to the risk of loss through fraud, error, corruption or other eventualities in its treasury management dealings, and fail to employ suitable systems and procedures and maintain effective contingency management arrangements to these ends. This is commonly referred to as operational risk.

The council will ensure that it has identified the circumstances which may expose it to the risk of loss through fraud, error, corruption or other eventualities in its treasury management dealings. Accordingly, it will employ suitable systems and procedures, and will maintain effective contingency management arrangements, to these ends.

The council will therefore:

- a) Seek to ensure an adequate division of responsibilities and maintenance at all times of an adequate level of internal check which minimises such risks.
- b) Fully document all its treasury management activities so that there can be no possible confusion as to what proper procedures are.
- c) Staff will not be allowed to take up treasury management activities until they have had proper training in procedures and are then subject to an adequate and appropriate level of supervision.
- d) Records will be maintained of all treasury management transactions so that there is a full audit trail and evidence of the appropriate checks being carried out.

1.8.1 Details of Systems and Procedures to be followed, including Internet Services

Authority

- Loan and Investment procedures are defined in the council's Financial Regulations and Financial Procedure Rules.
- The Scheme of Delegation to Officers sets out the authority given to the Corporate Director of Resources in relation to arranging the borrowing and investments of the authority. All loans and investments are negotiated by the Corporate Director of Resources or nominated Officers.

Procedures

- A password and PIN is required to access the Bankline system, which is used to make electronic payments.
- A username and password is required to access the SunGard Money Market Portal along with two factor authorisation.
- Payments can only be authorised by agreed officers having previously been notified to the current provider of our banking services and Money Market Portal.

Investment and borrowing transactions

- A detailed spreadsheet of loans and investments is maintained within the Financial Services team. This is regularly reconciled to the ledger.
- The loans spreadsheet is updated to record all lending and borrowing. This includes the date of the transaction, brokerage fees etc.
- Adequate and effective cash flow forecasting records are maintained on spreadsheets to support the decision to lend or borrow.
- Money borrowed or lent that is due to be repaid is recorded in the cash flow forecast.
- Written confirmation of deals is emailed promptly by the lending or borrowing institution.
- A broker note showing details of the loan arranged confirms all transactions placed through the brokers.
- The SunGard Portal, with emailed acknowledgements, confirms all money market transactions.
- Email acknowledgements confirm all fixed term deposits with banking institutions.

Regularity and security

- All lending is only made to institutions on the Approved List.
- All loans raised and repayments made go directly to and from the institution's bank account.
- Authorisation limits are set for every institution.
- Brokers have a list of named officials authorised to perform loan transactions.
- There is adequate insurance cover for employees involved in loan management and accounting.
- The control totals for borrowing and lending are regularly reconciled with the ledger balance sheet codes by the Financial Services team.
- There is a separation of duties in the Section between the recall of MMF's and its checking and authorisation.
- The council's bank holds a list of council officials who are authorised signatories.
- No member of the Treasury Management team, responsible for borrowing and lending, is an authorised signatory.

Checking

- The bank reconciliation is carried out regularly from the bank statement to the financial ledger.
- Balance Sheet ledger codes are reconciled monthly. Working papers are retained for audit inspection.
- A debt charge/investment income listing is produced every time the debt charge/investment income is recalculated for budget monitoring purposes. A debt charge/investment listing is also produced at the financial year-end and this document is retained for audit inspection.
- The method of accounting for unrealised losses or gains on the valuation of assets within the funds will comply with Accounting Codes of Practice by reflecting the market value of the fund in the balance sheet. This will be agreed with council's external auditors.
- We have complied with the requirements of the Code of Practice on Local Authority Accounting and will account for the funds at Fair Value through Profit or Loss. As a result, all gains and losses and interest (accrued and received) will be taken to the Comprehensive Income and Expenditure Statement.

Calculations

- The calculation of repayment of principal and interest notified by the lender or borrower is checked for accuracy against the amount calculated by the Financial Services team.

1.8.2 Emergency and Contingency Planning Arrangements Disaster Recovery Plan

Treasury Management related files (word and excel) are stored on the council's 'J' Drive with arrangements for contingency/back-up. Back up facilities can be accessed off site.

In the event of a 'Bankline System' failure, manual procedures would be followed with information being provided from the council's Bankers by telephone.

All members of the treasury management team are familiar with this plan and new members will be briefed on it.

1.8.3 Insurance Cover Details

The council has 'Fidelity' insurance cover with Zurich Municipal (ZM). This covers the loss of cash by fraud or dishonesty of employees. This cover is limited per transaction as follows:

- 11 designated officers (Corporate Director of Resources, Head of Contact Centre, Head of Governance and Business Support, Legal Services Manager, Head of Finance, Principal Accountant Capital and Treasury, Finance Business Partner x 3, Financial Systems, Transformation and Reporting Manager, and Financial Services Officer x 2) are indemnified for £3m.
- All other employees are indemnified for £250,000.

Officials Indemnity Insurance

The council also has an 'Officials Indemnity' insurance policy with ZM which covers the loss to the council from any actions and advice of its officers, excluding professional services provided under a written contract or agreement, that are negligent and without due care. This cover is currently limited to £1m for any one event with £10,000 excess.

Public Liability Insurance

The council also has 'Public Liability cover with ZM which covers the loss to the council from any actions or omissions which could give rise to a claim of negligence as a result of third party financial loss. This cover is currently limited to £10m for any one event with a £10,000 excess.

1.9 Price Market Risk Management

There is a risk that, through adverse market fluctuations in the value of the principal sums an organisation borrows and invests, its stated treasury management policies and objectives are compromised, against which effects it has failed to protect itself adequately.

The council will seek to ensure that its stated treasury management policies and objectives will not be compromised by adverse market fluctuations in the value of the principal sums it invests, and will accordingly seek to protect itself from the effects of such fluctuations.

TMP 2 PERFORMANCE MEASUREMENT

2.1 Evaluation and Review of Treasury Management Decisions

The council has a number of approaches to evaluating treasury management decisions:

- a) reviews with our treasury management consultants;
- b) annual review after the end of the year as reported to Council;
- c) half yearly monitoring reports to Council

2.1.1 Reviews with our treasury management consultants

The treasury management team holds reviews with the Treasury Management consultants every 12 months to review the performance of the investment and debt portfolios.

2.1.2 Annual review after the end of the financial year

An Annual Report on Treasury Management Activity is submitted to Council each year after the close of the financial year which reviews the performance of the debt and investment portfolios. This report contains the following:

- a) total debt and investments at the beginning and close of the financial year and average interest rates
- b) borrowing strategy for the year compared to actual strategy
- c) investment strategy for the year compared to actual strategy
- d) explanations for variance between original strategies and actual
- e) debt rescheduling done in the year
- f) actual borrowing and investment rates achieved through the year
- g) comparison of return on investments to the investment benchmark
- h) compliance with Prudential and Treasury Indicators

2.1.3 Half Yearly Monitoring Reports

A half yearly Report on Treasury Management is submitted to Council in November/December which reviews the performance of the debt and investment portfolios. This report contains the same information as the annual report but only includes information for the first 6 months of the year.

2.2 Benchmarks and Calculation Methodology

2.2.1 Debt Management

Average rate on all external debt.

Average rate on external debt borrowed in previous financial year.

2.2.2 Investment

The performance of in house investment earnings will be measured against the 7 day LIBID rate (London Interbank Bid Rate).

2.3 Policy Concerning Methods for Testing Value for Money in Treasury Management

2.3.1 Frequency and processes for tendering

Following the loss of the council's debt free status during 2007/08, Link Asset Services were engaged as the council's treasury advisor. The current contract is for three years until 31 March 23. The service was most recently benchmarked in March 2020 and further benchmarking exercises will be conducted every three years to ensure value for money is maintained.

2.3.2 Banking services

Whilst the council has been with NatWest for over 25 years, banking services have traditionally been re-tendered or renegotiated every 3 years to ensure that the level of prices reflect efficiency savings achieved by the supplier and current pricing.

In April 2021 the banking contract was re-negotiated for a period of three years. A benchmarking exercise is on-going to ensure our banking services continue to deliver value for money.

2.3.3 Money-broking services

The council will use money-broking services in order to make deposits or to borrow, and will establish charges for all services prior to using them. An approved list of brokers has been established which takes account of both price and quality of service.

2.3.4 Consultants'/advisors' services

The council's current policy is to appoint professional treasury management consultants (Link Group) and a benchmarking exercise is conducted prior to the end of the contract to ensure value for money. Separate leasing advisory consultants will be appointed where necessary.

2.3.5 Policy on External manager (other than relating to Superannuation Funds)

The council's policy is not to appoint external investment fund managers.

TMP 3 DECISION MAKING AND ANALYSIS

3.1 Funding, Borrowing, Lending, and new Instruments and Techniques:

3.1.1 Records to be kept

All loan transactions are recorded on a spreadsheet within the Cash flow folder on the J drive.

The following records will be used as relative to each loan or investment:

- Daily cash projections
- Money market rates obtained via SunGard website, or by telephone from institutions or brokers
- SunGard emails detailing each net trade and authorisation
- Electronic copies of NatWest CHAPS payment transactions
- Dealing slips for all money market transactions
- Brokers' confirmations for investment and temporary borrowing transactions
- Confirmations from borrowing/lending institutions where deals are done directly
- Temporary Lending Authorisation forms
- PWLB loan confirmations

- PWLB debt portfolio schedules

3.1.2 Processes to be pursued

- Cash flow analysis
- Ledger reconciliations
- Review of long-term borrowing requirement as applicable
- Debt and investment maturity analysis
- Monitoring of projected loan charges, interest and expenses costs
- Review of opportunities for debt rescheduling, as applicable
- Collation of a monthly borrowing and lending return

3.1.3 Issues to be addressed

3.1.3.1 In respect of every treasury management decision made the council will:

- a) Above all be clear about the nature and extent of the risks to which the council may become exposed.
- b) Be certain about the legality of the decision reached and the nature of the transaction, and that all authorities to proceed have been obtained.
- c) Be content that the documentation is adequate both to deliver the council's objectives and protect the council's interests, and to deliver good housekeeping.
- d) Ensure that relevant due diligence has taken place.
- e) Ensure that third parties are judged satisfactory in the context of the council's creditworthiness policies, and that limits have not been exceeded.
- f) Be content that the terms of any transactions have been fully checked against the market, and have been found to be competitive.

3.1.3.2 In respect of borrowing and other funding decisions, the council will:

- a) Consider the ongoing revenue liabilities created and the implications for the organisation's future plans and budgets.
- b) Evaluate the economic and market factors that might influence the manner and timing of any decision to finance capital schemes.
- c) Consider the merits and demerits of alternative forms of funding, including funding from revenue, leasing and external grant providers.
- d) Consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use.

3.1.3.3 In respect of investment decisions, the council will:

- a) Consider the risks to capital and returns and the implications for the organisation's future plans and budgets.
- b) Consider the optimum period, in the light of cash flow availability and prevailing market conditions.

- c) Consider the alternative investment products and techniques available, especially the implications of using any which may expose the organisation to changes in the value of its capital.

TMP 4 APPROVED INSTRUMENTS, METHODS AND TECHNIQUES

4.1 Approved Activities of the Treasury Management Operation

- Borrowing;
- Lending;
- Debt repayment and rescheduling;
- Consideration, approval and use of new financial instruments and treasury management techniques;
- Managing the underlying risk associated with the council's capital financing and surplus funds activities;
- Managing cash flow;
- Banking activities; and
- Leasing.

4.2 Approved Instruments for Investments

The council will undertake its treasury management activities by employing only those instruments, methods and techniques detailed in the Annual Investment Strategy and within the limits and parameters defined in TMP1 Treasury risk management.

4.3 Approved Techniques

Forward dealing up to 364 days.

4.4 Approved Methods and Sources of Raising Capital Finance

Finance will only be raised in accordance with the Local Government Act 2003, and within this limit the council has a number of approved methods and sources of raising capital finance. These are:

On Balance Sheet	Fixed	Variable
PWLB*	●	●
Market (long-term) (Not currently)	●	●
Market (temporary)	●	●
Internal (capital receipts and revenue balances)	●	●
Leasing (finance leases) (Not currently)	●	●
Other Methods of Financing		
Government and EU Capital Grants		
Lottery monies		
Donations and contributions		
Operating leases (Not currently)		

Borrowing will only be done in Sterling. All forms of funding will be considered dependent on the prevailing economic climate, regulations and local considerations. The Corporate Director of Resources has delegated powers in accordance with Financial Regulations and Financial Procedure Rules, the Scheme of Delegation to Officers and the Treasury Management Strategy to take the most appropriate form of borrowing from the approved sources.

*Recent changes brought in by the Chancellor introduced a prohibition to deny access to borrowing from the PWLB for any local authority which had the purchase of assets for yield in its three-year capital programme.

4.5 Investment Limits

The Annual Investment Strategy sets out the limits and the guidelines for use of each type of investment instrument.

4.6 Borrowing Limits

See the Treasury Management and Annual Investment Strategy and Prudential and Treasury Indicators.

4.7 MIFID II (Markets n Financial Instruments Directive)

The council has reviewed its classification with financial institutions under MIFID II and is registered as a professional client with the following organisations:

SunGard FIS (Investment Portal)

RP Martins (Brokers)

Tradition (Brokers)

Deutsche Asset Management (MMF)

Federated (MMF)

Insight Investment (MMF)

Aberdeen Standard Investments (MMF)

The following organisations have informed us that they do not require the council to be registered as a professional client to invest in their Money Market Funds.

LGIM (MMF)

Blackrock (MMF)

Goldman Sachs (MMF)

The council has remained as a retail client with its Treasury Management Consultants Link Asset Services.

The council can chose to opt up from retail to professional status at any point assuming it meets certain criteria and with the agreement of the relevant financial institution.

4.8 Money Market Fund Reform

New Money Market Fund European regulations came into force on 21 July 2018 and existing funds had to be compliant by 21 January 2019. There are now three structural options of MMF's. These are CNAV, (Public Debt Constant Net Asset Value), LVNAV (Low Volatility Net Asset Value) and VNAV (Variable Net Asset Value). The council can invest in CNAV, LVNAV and VNAV MMF's as included in TMP1 Schedule 1.

TMP 5 ORGANISATION, CLARITY AND SEGREGATION OF RESPONSIBILITIES, AND DEALING ARRANGEMENTS

5.1 Allocation of responsibilities

Full Council

- approval of annual strategy
- approval of MRP Policy Statement
- budget consideration and approval
- receive and review the mid-year and annual monitoring report

Cabinet

- receiving and reviewing reports on treasury management policies, practices and activities
- budget consideration and approval
- approval of the division of responsibilities as reflected in TMP5
- approving the selection of external service providers and agreeing terms of appointment

Overview and Scrutiny

- effective scrutiny of the treasury management strategy and policies.

5.2 Principles and Practices Concerning Segregation of Duties

The Corporate Director of Resources authorises all new long-term borrowing.

Transactions relating to pre-existing agreements are delegated to nominated officers within the Financial Services team.

Short-term borrowing and investment is authorised by the Corporate Director of Resources, Head of Finance, Head of Governance and Business Support, Legal Services Manager, Head of Contact Centre or Principal Accountant Capital and Treasury.

The following duties are undertaken by separate officers:

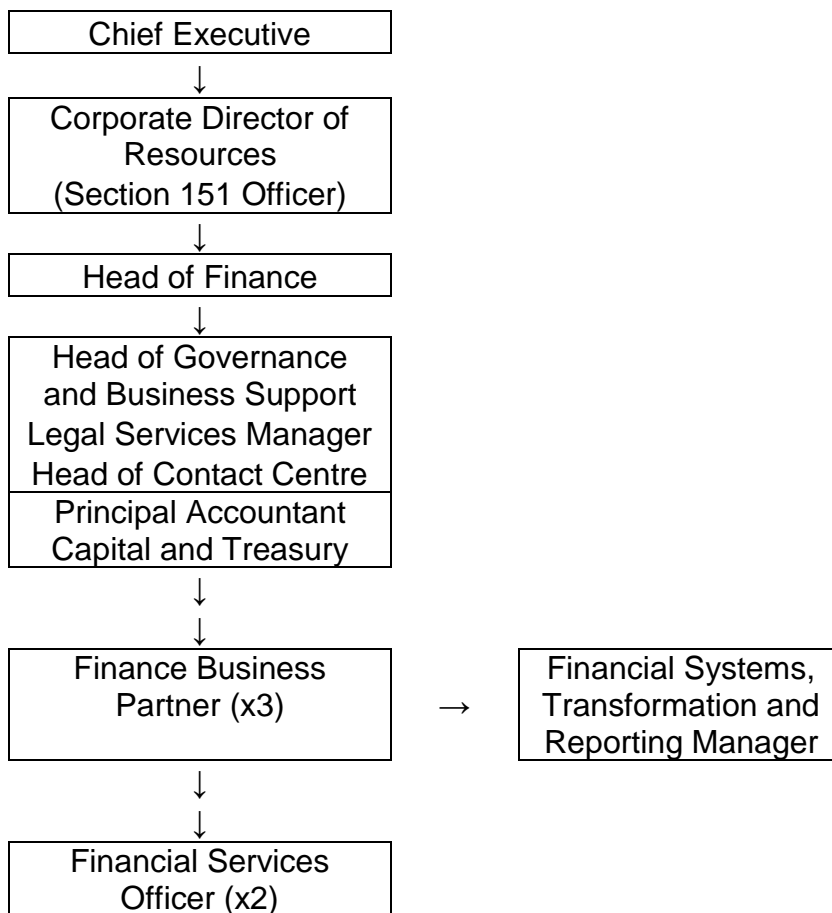
- | | | |
|---------|---|---|
| Dealing | - | negotiating deals |
| | - | receipt and checking of broker's confirmation against loans spreadsheet |
| | - | reconciliation of control accounts |
| | - | bank reconciliation |

- Accounting Entry - processing the expenditure or income i.e. posting the entries into the accounting system
- Authorising - approval and payment
- approval of deals.

The table overleaf identifies who performs particular roles within the team.

Function	Chief Executive	Section 151 Officer (Corporate Director Resources)	Head of Finance	Head of Contact Centre/ Head of Governance and Business Support/ Legal Services Manager Principal Accountant Capital & Treasury	Financial Systems, Transformation and Reporting Manager	Finance Business Partners (x3)	Financial Services Officer (x2)
Adherence to TM Practices, Policies and Strategies	•	•	•				
Ensure regular reports submitted to Cabinet on Treasury Policy, activity and performance	•	•	•				
Revisions of treasury management policy statement, policies and practices		•	•				
Approval of external service providers and agreeing terms of appointment		•	•				
Establishing new banking facilities (e.g. Base Tracker Accounts)		•	•				
Authorisation of Long term borrowing and investing		•	•				
Amending bank mandate		•	•				
Authorisation of short term borrowing and investing		•	•	•			
Bankline - Authorising payments		•	•	•			
Bankline - Creating payments						•	•
SunGard – Authorising transfers		•	•	•			
SunGard – Creating transfers						•	•
Day to day dealing						•	•
Cash flow projections						•	•
Maintenance of loans and investment spreadsheets						•	•
System Administrator (e.g. setting limits, new users)					•		
Responsibility for ensuring Bank Reconciliation performed					•		

5.3 Treasury Management Organisation Chart



5.4 Statement of Treasury Management Duties/Responsibilities of Each Treasury Post

5.4.1 The responsible officer is the person charged with the execution and administration of treasury management decisions acting in accordance with the council's policy statement and TMP's and as a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management. In this council this is the S151 Officer/Corporate Director of Resources or the Head of Finance in their absence, who will carry out the following duties:

- a. Recommend clauses, treasury management policy / practices for approval, reviewing the same on a regular basis, and monitoring compliance.
- b. Submit treasury management policy reports as required.
- c. Submit budgets and budget variations in accordance with the Financial Regulations and Financial Procedure rules.
- d. Receive and review management information reports.
- e. Review the performance of the treasury management function and promote efficiency reviews.
- f. Ensure the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function.
- g. Ensure the adequacy of internal audit, and liaise with external audit.
- h. Recommend the appointment of external service providers, where applicable, in accordance with the council's Financial Regulations and Financial Procedure Rules.
- i. The Corporate Director of Resources has delegated powers through this policy to take the most appropriate form of borrowing from the approved sources, and to make the most appropriate form of investments in approved instruments.
- j. The Corporate Director of Resources may delegate this power to borrow and invest to certain members of staff as indicated in TMP 5.3 above. All transactions must be authorised by one of the named officers below:
 - Corporate Director Resources (Section 151 Officer)
 - Head of Finance
 - Head of Governance and Business Support
 - Legal Services Manager
 - Head of Contact Centre
 - Principal Accountant Capital and Treasury
- k. The Corporate Director of Resources will ensure that the Policy is adhered to, and if not will bring the matter to the attention of elected members as soon as possible.
- l. Prior to entering into any capital financing, lending or investment transaction, it is the responsibility of the Corporate Director of Resources to be satisfied, by reference to the council's legal department and external advisors as appropriate, that the proposed transaction does not breach any statute, external regulation or the council's Financial Regulations and Financial Procedure Rules.
- m. It is also the responsibility of the Corporate Director of Resources to ensure that the council complies with the requirements of 'The Non-

Investment Products Code' for principals and broking firms in the wholesale markets.

- n. Prepare a Capital Strategy to include capital expenditure, capital financing and treasury management with a long-term timeframe.
- o. Ensure that the Capital Strategy is prudent, sustainable, affordable and prudent in the long-term and provides value for money.
- p. Ensure that due diligence has been carried out on all investments and is in accordance with the risk appetite of the authority.

5.4.2 Head of Finance (or delegated officer)

The responsibilities of this post will be:

- a. Execution of transactions.
- b. Adherence to agreed policies and practices on a day-to-day basis.
- c. Maintaining relationships with third parties and external service providers.
- d. Supervising treasury management staff.
- e. Monitoring performance on a day-to-day basis.
- f. Receives management information reports from the responsible officer.
- g. Identifying and recommending opportunities for improved practices.

5.4.3 Chief Executive

The responsibilities of this post will be:

- a. Ensuring that the Corporate Director of Resources reports regularly to the full council on treasury policy, activity and performance.

5.4.4 The Monitoring Officer (Legal Services Manager) or Deputy Monitoring Officer (Human Resources Manager)

The responsibilities of this post will be:

- a. Ensuring compliance by the Corporate Director of Resources with the treasury management policy statement and treasury management practices and that they comply with the law.
- b. Being satisfied that any proposal to vary treasury policy or practice complies with law or any code of practice.
- c. Giving advice to the Corporate Director of Resources when advice is sought.

5.4.5 Internal Audit

The responsibilities of this post will be:

- a. Reviewing compliance with approved policy and procedures.
- b. Reviewing division of duties and operational practice.
- c. Undertaking probity audit of the treasury function (sampling transactions).

5.5 Absence Cover Arrangements

Refer to the organisation chart at TMP 5.3 above and role responsibilities at TMP 5.4 above.

5.6 Dealing Limits

Persons authorised to deal are identified at TMP 5.3 above and dealing limits are set out in TMP 1.1.1.

5.7 List of Approved Brokers

A list of approved brokers is maintained within the Financial Services team (see TMP 11.1.2) and a record of all transactions recorded against them.

5.8 Policy on Brokers' Services

It is the council's policy to rotate business between brokers in accordance with best practice.

5.9 Policy on Taping of Conversations

It is not council policy to tape broker's conversations.

5.10 Direct Dealing Practices

The council will consider dealing direct with counterparties if it is appropriate and the council believes that better terms will be available. There are certain types of accounts and facilities where direct dealing is required as follows:

- NatWest Call Account and 35 and 95 day Notice Account
- Santander Call Account and Fixed Term Deposit
- Handelsbanken 10 and 35 day Notice Account
- Goldman Sachs International Bank via Link Asset Services to access Tranche rates
- Standard Chartered Bank via Link Asset Services to access Tranche rates
- Bank of Scotland 95 day Notice Account and Overnight Account
- Qatar National Bank
- SunGard Money Market Portal – currently authorised to deal with:
 - i. Deutsche Managed Sterling LVNAV Fund – Advisory
 - ii. Federated (PR) Short-Term GBP Prime Fund Class 3
 - iii. Blackrock ICS Sterling LVNAV Fund – core
 - iv. Goldman Sachs Sterling Reserves Fund 630
 - v. LGIM Sterling Liquidity Fund Class 4
 - vi. Insight Sterling Liquidity Fund Class 5
 - vii. Aberdeen GB Liquidity Fund Class K1

5.11 Settlement Transmission Procedures

Instructions are given by email with payments being transferred by 3.30pm on the same day. In the case of SunGard Money Market transactions, instructions are given via the internet and payments are made by 12.30pm for the Deutsche Managed Sterling LVNAV Fund, 1.30pm for the Federated (PR) Short-Term GBP Prime Fund and 1.00pm for all other funds.

5.12 For each deal undertaken a record should be prepared giving details of the dealer, amount, period, counterparty, interest rate, dealing date, payment date(s) and broker (where applicable).

5.13 Arrangements Concerning the Management of Third-Party Funds

The Authority administers a number of third party funds totalling £80,294 at 31 March 2021. The largest being the North West District Surveyors Association with a balance held of £47,444 and several smaller funds including the Fielden Trust with a balance held of £6,169 at 31 March 2021. The Fielden Trust balance is invested as part of the council's surplus funds and interest is calculated monthly based on council's Natwest Overnight account rate.

TMP 6 REPORTING REQUIREMENTS AND MANAGEMENT INFORMATION ARRANGEMENTS

6.1 Annual Programme of Reporting

The council will ensure that regular reports are prepared and considered on the implementation of its treasury management policies; on the effects of decisions taken and transactions executed in pursuit of those policies; on the implication of changes, particularly budgetary, resulting from regulatory, economic, market or other factors affecting its treasury management activities; and on the performance of the treasury management function.

As a minimum the council will receive:

- a. Annual reporting requirements before the start of the year:
 - i. review of the organisation's approved clauses, treasury management policy statement and practices;
 - ii. prudential and treasury indicators and treasury strategy report incorporating the capital strategy, the minimum revenue provision (MRP), the treasury management strategy and investment strategy.
- b. A mid-year treasury management report
- c. Annual review report after the end of the year

6.2 Annual Treasury Management Strategy

6.2.1 The Treasury Management Strategy sets out the specific expected treasury activities for the forthcoming financial year. This strategy will be submitted to the Cabinet and then full council for approval before the commencement of each financial year.

6.2.2 The formulation of the annual Treasury Management Strategy involves determining the appropriate borrowing and investment decisions in the light of the anticipated movement in both fixed and shorter-term variable interest rates. For instance, the council may decide to postpone borrowing if fixed interest rates are expected to fall, or borrow early if fixed interest rates are expected to rise.

6.2.3 The Treasury Management Strategy is concerned with the following element

- Prudential and Treasury Indicators
- Current Treasury portfolio position
- Borrowing requirement
- Prospects for interest rates
- Borrowing strategy
- Policy on borrowing in advance of need
- Debt rescheduling
- Investment strategy
- Creditworthiness policy
- Policy on the use of external service providers
- Any extraordinary treasury issue (as necessary)
- The MRP policy statement

6.2.4 The Treasury Management Strategy will establish the expected move in interest rates against alternatives (using all available information such as published interest rate forecasts where applicable) and highlight sensitivities to different scenarios.

6.3 The Annual Investment Strategy Statement

At the same time as the council receives the Treasury Management Strategy it will also receive a report on the Annual Investment Strategy which will set out the following:

- a. The council's risk appetite in respect of security, liquidity and optimum performance
- b. The definition of high credit quality to determine what are specified investments as distinct from non-specified investments
- c. Which specified and non-specified instruments the council will use
- d. Whether they will be used by the in house team, external managers or both (if applicable)
- e. The council's policy on the use of credit ratings and other credit risk analysis techniques to determine creditworthy counterparties
- f. Which credit rating agencies the council will use
- g. How the council will deal with changes in ratings, rating watches and rating outlooks
- h. Limits for individual counterparties and group limits
- i. Country limits
- j. Interest rate outlook
- k. Budgeted investment return
- l. Use of a cash fund manager (if applicable)
- m. Policy on the use of external service providers (if applicable)

6.4 The Annual Minimum Revenue Provision Statement

This statement will set out how the council will make revenue provision for repayment of its borrowing using the four options for so doing and will be submitted at the same time as the Treasury Management and Annual Investment Strategy.

6.5 Policy On Prudential and Treasury Indicators

6.5.1 The council approves before the beginning of each financial year a number of treasury limits referred to as the Prudential and Treasury Indicators.

6.5.2 The Corporate Director of Resources is responsible for incorporating these limits into the Annual Treasury Management Strategy and for ensuring compliance with the limits. Should it prove necessary to amend these limits, the Corporate Director of Resources shall submit the changes for approval to full council.

6.6 Mid-Year Review

The council will review its treasury management activities on a six monthly basis. This review will consider the following:

- a. activities undertaken
- b. variations (if any) from agreed policies/practices
- c. interim performance report
- d. regular monitoring
- e. monitoring of treasury management indicators for local authorities

6.7 Annual report on Treasury Management Activity

An annual report will be presented to council at the earliest practicable meeting after the end of the financial year, but in any case by the end of September. This report will include the following:

- a. Transactions executed and their revenue effects;
- b. Report on risk implications of decisions taken and transactions executed;
- c. Compliance report on agreed policies and practices and all statutory/regulatory requirements;
- d. Performance Report;
- e. Report on compliance with the CIPFA Treasury Management Code; and
- f. Monitoring of treasury management indicators.

6.8 Management Information Reports

Management information reports are prepared quarterly and contain the following information:

- a. A summary of transactions executed, brokers used and fees paid and their revenue effect; and
- b. Measurements of performance such as loan charges/investment income.

6.9 Publication of Treasury Management Reports

Reports presented to council are available to view on the council's website www.wyre.gov.uk

TMP7 BUDGETING, ACCOUNTING AND AUDIT ARRANGEMENTS

7.1 Statutory/Regulatory Requirements

The accounts are drawn up in accordance with the Code of Practice on Local Authority Accounting which is recognised by statute as representing proper accounting practices.

The council has also adopted in full the principles set out in CIPFA's 'Treasury Management in the Public Services - Code of Practice' (the 'CIPFA Code'), together with those of its specific recommendations that are relevant to this council's treasury management activities.

7.2 Sample Budgets / Accounts / Prudential and Treasury Indicators

The Corporate Director of Resources will prepare a five year medium term financial plan with Prudential and Treasury Management Indicators reflecting the overall budget for the current year and provisional estimates for the following four years. This will include the costs involved in running the function and any associated income. The Head of Finance will exercise effective controls over this budget and monitor performance against Prudential and Treasury Indicators, and will report upon and recommend any changes required in accordance with TMP6.

7.3 List of Information Required by the External Auditors

- Reconciliation of loans outstanding in the financial ledger to Treasury Management records
- Maturity analysis of loans outstanding
- Certificates for new long term loans taken out in the year
- Reconciliation of loan interest, discounts received and premiums paid to financial ledger by loan type
- Calculation of loans fund interest and debt management expenses
- Details of interest rates applied to internal investments
- Calculation of interest on working balances where applicable
- Interest accrual calculation
- Principle and interest charges reports from Civica
- Analysis of any deferred charges where applicable
- Annual Treasury Report
- Treasury Management and Annual Investment Strategy and Prudential and Treasury Indicators
- Review of observance of limits set by Prudential and Treasury Indicators
- Calculation of the MRP

7.4 Budget Monitoring Report

Year to date and forecast outturn against budget, with variances, are examined in terms of interest and treasury management expenses as part of the council's monthly budget monitoring.

TMP 8 CASH AND CASH FLOW MANAGEMENT

8.1 Arrangements for Preparing/Submitting Cash Flow Statements

Cash flow projections are prepared annually and daily. The annual cash flow projections are prepared from the previous years' cash flow records, adjusted for known changes in levels of income, and expenditure and also changes in payment and receipt dates. These details are supplemented on an ongoing basis by information received of new or revised amounts to be paid or received as and when they are known.

8.2 Bank Statement Procedures

The council downloads data daily from its bank. All amounts on downloads are checked to source data from payroll, creditors etc. A formal bank reconciliation is undertaken on a monthly basis.

8.3 Payment Scheduling and Agreed Terms of Trade with Creditors

In the present economic climate and in line with a request from the Government, we have committed to paying 80% of invoices within 10 days (local performance indicator RES23). In the 2020/21 financial year 90.33% of invoices were paid within 10 days. However payments to individuals, in relation to refunds are immediate.

8.4 Arrangements for Monitoring Debtor/Creditor levels

Details are passed to the treasury team on a regular basis to assist in updating the cash flow model.

8.5 Procedures for Banking of Funds

All money received by an Officer on behalf of the council will without unreasonable delay be paid into the council's bank accounts via the Financial Services team. The cashier will notify the Financial Services Officer on Monday and Tuesday of cash and cheques banked on the Friday and Monday so that the figures can be taken into account in the daily cash flow.

8.6 Practices Concerning Prepayments to Obtain Benefits

The council has no formal arrangements in place. Where such opportunities arise (for example whereby a payment in advance would secure a further discount) the prepayment would be authorised by the responsible officer.

A report went to Cabinet on 15 February 2017 agreeing prepayment of pension contributions in principle and delegating ultimate authority to the S151 officer to make the final decision. The prepayment of three years'

pension contributions (commencing April 2017) was made to the Lancashire County Pension Fund in May 2017. The S151 officer (Corporate Director of Resources) has authorised a further prepayment for the 2020/21–2022/23 contribution which was paid to the pensions fund in May 2020.

TMP 9 MONEY LAUNDERING

9.1 Proceeds of Crime Act 2002

Money laundering has the objective of concealing the origin of money generated through criminal activity. Legislation has given a higher profile to the need to report suspicions of money laundering. The Proceeds of Crime Act (POCA) 2002 established the main offences relating to money laundering. In summary, these are:

- concealing, disguising, converting, transferring or removing criminal property from England and Wales, from Scotland or from Northern Ireland.
- being concerned in an arrangement which a person knows or suspects facilitates the acquisition, retention, use or control of criminal property
- acquiring, using or possessing criminal property

These apply to any person in the UK in a personal or professional capacity. Any person involved in any known or suspected money-laundering activity in the UK risks a criminal conviction. Other offences under the POCA include:

- failure to disclose money-laundering offences
- tipping off a suspect, either directly or indirectly
- doing something that might prejudice an investigation – for example, falsifying a document.

9.2 The Terrorism Act 2000

This act made it an offence of money laundering to become concerned in an arrangement relating to the retention or control of property likely to be used for the purposes of terrorism, or resulting from acts of terrorism. All individuals and businesses in the UK have an obligation to report knowledge, reasonable grounds for belief or suspicion about the proceeds from, or finance likely to be used for, terrorism or its laundering, where it relates to information that comes to them in the course of their business or employment.

9.3 The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (amended in 2019)

Organisations pursuing relevant business (especially those in the financial services industry regulated by the FCA) are required to appoint a nominated officer and implement internal reporting procedures; train relevant staff in the subject; establish internal procedures with respect to money laundering; obtain, verify and maintain evidence and records of the identity of new clients and transactions undertaken and report their suspicions. In June 2017 the UK

Government published the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, which replaced the Money Laundering Regulations 2007.

9.4 Local Authorities

Public service organisations and their staff are subject to the full provisions of the Terrorism Act 2000 and may commit most of the principal offences under the Proceeds of Crime Act, but are not legally obliged to apply the provisions of the Money Laundering Terrorist Financing and Transfer of Funds Regulations 2017 (amended in 2019). However, as responsible public bodies, they should employ policies and procedures which reflect the essence of the UK's anti-terrorist financing, an anti-money laundering, regimes. Accordingly, this council comply and have an Anti-Money Laundering Policy which is reviewed annually by Audit Committee and most recently on 16 November 2021.

9.5 Procedures for Establishing Identity / Authenticity of Lenders

It is not a requirement under POCA for local authorities to require identification from every person or organisation it deals with. However, in respect of treasury management transactions, there is a need for due diligence and this will be affected by following the procedures below.

- The council does not accept loans from individuals. All loans are obtained from the PWLB, other local authorities or from authorised institutions under the Financial Services and Markets Act 2000. This register can be accessed through the Financial Conduct Authority website on www.fca.org.uk.

9.6 Methodologies for Identifying Sources of Deposits

In the course of its Treasury activities, the council will only lend money to or invest with those counterparties that are on its approved lending list. These will be local authorities, the PWLB, Bank of England and authorised deposit takers under the Financial Services and Markets Act 2000. (The Financial Services register can be accessed through the FCA website on www.fca.org.uk).

All transactions will normally be carried out by BACS/CHAPS for making deposits or repaying loans.

TMP 10 TRAINING AND QUALIFICATIONS

10.1 The council recognises the importance of ensuring that all relevant individuals involved in the treasury management function are fully equipped to undertake the duties and responsibilities allocated to them. There are two categories of relevant individuals:

- a. Treasury management staff employed by the council. All treasury management staff should receive appropriate training relevant to the requirements of their duties at the appropriate time. The council operates

a Performance Appraisal Scheme which identifies the training requirements of individual members of staff engaged on treasury related activities.

Additionally, training may also be provided on the job and it will be the responsibility of the Head of Finance to ensure that all staff under their authority receive the level of training appropriate to their duties. This will also apply to those staff who, from time to time cover for absences from the treasury management team.

All Financial Services Team members responsible for Treasury Management were invited to attend two Treasury Management Training sessions delivered by Link Asset Services on 2 February 2022 and 9 February 2022. Further training will be arranged as required.

- b. Members charged with governance of the treasury management function. Those charged with governance recognise their individual responsibility to ensure that they have the necessary skills to complete their role effectively. All members responsible for scrutiny were invited to attend a Treasury Management training session delivered by Link Asset Services on 24 February 2022 and prior to that training was given to the Overview and Scrutiny Committee on 18 January 2021.

10.2 Details of Approved Training Courses

Treasury management staff will attend courses provided by our treasury management consultants, CIPFA, etc.

10.3 Records of Training Received by Treasury Staff

Records are maintained within the HR21 system and on individual officers' Personal Development Plans.

10.4 Approved Qualifications for Treasury Staff

Staff involved with the day to day treasury management function, have the following incorporated within their job description:

- To manage the council's day to day investment and borrowing requirements in accordance with the Treasury Management Strategy
- To assist with the drafting of the Treasury Management Strategy and associated Member reports.

10.5 Statement of Professional Practice (SOPP)

1. Where the Chief Financial Officer is a member of CIPFA, there is a professional need for the CFO to be seen to be committed to professional responsibilities through both personal compliance and by ensuring that relevant staff are appropriately trained.

2. Other staff involved in treasury management activities who are members of CIPFA must also comply with the SOPP.

10.6 Member training records

Records will be kept by Democratic Services of all training in treasury management provided to members.

10.7 Members charged with governance

The Overview and Scrutiny Committee has been nominated as the responsible body for ensuring scrutiny of the treasury management strategy and policies. Members charged with diligence also have a personal responsibility to ensure that they have the appropriate skills and training for their role.

TMP 11 USE OF EXTERNAL SERVICE PROVIDERS

11.1 Details of Contracts with Service Providers, Including Bankers, Brokers, Consultants and Advisers

This council recognises that responsibility for treasury management decisions remains with the Council at all times. It recognises that there is potential value in employing external providers to assist it in the field of treasury management. In particular, it will use external consultants to provide specialist advice in this ever more complex area. However, it will ensure that it fully understands what services are being provided and that they meet the needs of this organisation, especially in terms of being objective and free from conflicts of interest. It will also ensure that the terms of their appointment are subject to regular review.

It will also ensure that the skills of the in-house treasury management team are maintained to a high enough level whereby they can provide appropriate challenge to external advice and can avoid undue reliance on such advice.

Treasury management staff and their senior management will therefore be required to allocate appropriate levels of time to using the following sources of information so that they are able to develop suitable levels of understanding to carry out their duties, especially in challenge and avoiding undue reliance.

- The quality financial press
- Market data
- Information on government support for
- s and
- The credit ratings of that government support

11.1.1 Banking Service

- a. Name of supplier of service: National Westminster Bank
The branch address is:
Victoria Square
Thornton Cleveleys
FY5 2AL
0845 3021590
- b. Regulatory status – banking institution authorised to undertake banking activities by the FCA
- c. 3 year contract with commencing 01/04/2021
- d. Cost of service is variable depending on schedule of tariffs and volumes
- e. Payments due quarterly

11.1.2 Money-broking Services

The council will use money brokers for temporary borrowing and investment and long term borrowing. It will seek to give an even spread of business amongst the following approved brokers.

Name of supplier of service:

- a. RP Martin Brokers (UK) Trading name of BGC Brokers LP
Cannon Bridge House
25 Dowgate Hill
London
EC4R 2BB
0207 469 9000
Regulatory Status: BGC Brokers LP FCA Authorised 454814
- b. Tullett Prebon Europe Ltd
Tullet Prebon Group Ltd
155 Bishopsgate
London
EC2M 3TQ
020 7200 7000
Regulatory Status: FCA Authorised 146880
- c. Tradition UK Ltd
Beaufort House
15 St. Botolph Street
London
EC3A 7QX
0207 377 0050
Regulatory Status: FCA Authorised 13900

When undertaking temporary borrowing, the brokers currently charge commission at 1% of interest due. There is no commission charge for undertaking investment transactions.

11.1.3 Consultants'/advisors' Services

Treasury Consultancy Services

The council will seek to take expert advice on interest rate forecasts, annual treasury management strategy, timing for borrowing and lending, debt rescheduling, use of various borrowing and investment instruments, how to select credit worthy counterparties to put on its approved lending list etc.

- a. Name of supplier of service is: Link Asset Services Limited. Their address is :
6th Floor
65 Gresham Street
London
EC2V 7NQ
0871 664 6800
- b. Regulatory Status: Investment Advisor authorised by the FCA 150403
- c. 3 year contract commenced 01/04/20
- d. Cost of the service is £8,000 per year
- e. Payments due in two instalments in September and March.

11.1.4 Leasing Consultancy Services

The council currently has no requirement for leasing consultancy but previously used Chrystal Consulting. Other Consultancy services may be employed on short-term contracts as and when required.

11.1.5 Custodian Facility

The council will use a Custodian Facility as required when it invests in Certificates of Deposit (CD's).

11.1.6 Credit Rating Agency

The council receives a credit rating service through its treasury management consultants, the cost of which is included in the consultant's annual fee.

11.2 Procedures and Frequency for Tendering Services

The banking contract was renegotiated during the pandemic and a further three year contract commencing 01/04/2021 was entered into with NatWest. The treasury consultancy service was renewed for a three year period commencing 1/4/2020 after a favourable benchmarking exercise. The process for advertising and awarding contracts will be in line with the Council's Financial Regulations and Financial Procedure Rules.

TMP 12 CORPORATE GOVERNANCE

12.1 List of Documents to be made available for public inspection

- a. The council is committed to the principle of openness and transparency in its treasury management function and in all of its functions.
- b. It has adopted the CIPFA Code of Practice on Treasury Management and implemented key recommendations on developing Treasury Management Practices, formulating a Treasury Management Policy Statement and implementing the other principles of the Code.
- c. The following documents are available for public inspection:
 - Statement of Accounts
 - Revenue Estimates and Capital Programme
 - Medium Term Financial Plan
 - Treasury Management Policy Statement and Practices
 - Treasury Management and Annual Investment Strategy
 - MRP Policy Statement
 - Annual Treasury Management Report
 - Minutes of Council/Cabinet/Overview and Scrutiny Committee Meetings
 - Capital Strategy

This page is intentionally left blank

Appendix 3

TREASURY MANAGEMENT STRATEGY AND ANNUAL INVESTMENT STRATEGY 2022/23

1. Introduction

1.1 Background

The council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the council's low risk appetite, providing adequate liquidity initially before considering investment return.

The second main function of the treasury management service is the funding of the council's capital plans. These capital plans provide a guide to the borrowing need of the council, essentially the longer-term cash flow planning, to ensure that the council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans, or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet council risk or cost objectives.

The contribution the treasury management function makes to the authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.

CIPFA defines treasury management as:

“The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

This authority has not engaged in any commercial investments and has no non-treasury investments.

1.2 Reporting requirements

1.2.1 Capital Strategy

The 2021 CIPFA Prudential and Treasury Management Codes require all local authorities to prepare a capital strategy report which will provide the following:

- A high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- An overview of how associated risk is managed
- The implication for future sustainability

The aim of this capital strategy is to ensure that all elected members on full council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

1.2.2 Treasury Management Reporting

The council is currently required to receive and approve, as a minimum, three main treasury reports each year, which incorporate a variety of policies, estimates and actuals.

- a. Prudential and treasury indicators and treasury strategy** (this report) – The first, and most important report is forward looking and covers:
 - The capital plans (including prudential indicators);
 - A minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
 - The treasury management strategy, (how the investments and borrowing are to be organised) including treasury indicators; and
 - An investment strategy (the parameters on how investments are to be managed).
- b. A mid-year treasury management report** – This is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether any policies require revision.
- c. An annual treasury report** – This is a backward looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

1.2.3 Scrutiny

The above reports are required to be adequately scrutinised before being recommended to the council. This role is undertaken by the Overview and Scrutiny Committee.

1.3 Treasury Management Strategy for 2022/23

The strategy for 2022/23 covers two main areas:

1.3.1 Capital issues

- The capital expenditure plans and the associated prudential indicators;
- The minimum revenue provision (MRP) policy.

1.3.2 Treasury management issues

- The current treasury position;
- Treasury indicators which limit the treasury risk and activities of the council;
- Prospects for interest rates;
- The borrowing strategy;
- Policy on borrowing in advance of need;
- Debt rescheduling;
- The investment strategy;
- Creditworthiness policy; and
- The policy on use of external service providers.

These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, DLUHC MRP Guidance, the CIPFA Treasury Management Code and DLUHC Investment Guidance.

1.4 Training

The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny. All members were invited to attend a Treasury Management training session delivered by our Treasury Management Consultants on 24 February 2022 and prior to this, training was given to Overview and Scrutiny Committee on 18 January 2021.

The training needs of treasury management officers are periodically reviewed.

1.5 Treasury management consultants

The council uses Link Group, Treasury Solutions Ltd as its external treasury management advisors.

The council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of our external service providers. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisers.

It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The council will ensure that the terms of their

appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review.

2. **The Capital Prudential Indicators 2022/23 – 2026/27**

The council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans. The Prudential Indicators, capital expenditure plans and how these plans are being financed by capital or revenue resources were approved by Cabinet at its meeting on 16 February 2022.

2.1 **Capital Expenditure**

This prudential indicator is a summary of the council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle.

Capital Expenditure	2020/21 Actual £000	2021/22 Estimate £000	2022/23 Estimate £000	2023/24 Estimate £000	2024/25 Estimate £000	2025/26 Estimate £000	2026/27 Estimate £000
Total	6,789	15,043	10,095	14,728	14,666	11,245	2,484

Other long-term liabilities – The above financing need excludes other long-term liabilities, such as PFI and leasing arrangement that already include borrowing instruments (not currently applicable to Wyre).

The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Financing of Capital Expenditure	2020/21 Actual £000	2021/22 Estimate £000	2022/23 Estimate £000	2023/24 Estimate £000	2024/25 Estimate £000	2025/26 Estimate £000	2026/27 Estimate £000
Capital Receipts	65	24	0	0	0	0	0
Capital Grants and Contributions	3,518	11,526	9,939	14,578	14,363	11,030	2,080
Revenue / Reserves	3,206	3,493	156	150	303	215	404
Total	6,789	15,043	10,095	14,728	14,666	11,245	2,484
Net Financing need for the Year	0	0	0	0	0	0	0

2.2 The council's borrowing need (the Capital Financing Requirement)

The second prudential indicator is the council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the council's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR.

The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each asset's life, and so charges the economic consumption of capital assets as they are used.

The CFR includes any other long-term liabilities (e.g. PFI schemes, finance leases). Whilst these increase the CFR, and therefore the council's borrowing requirement, these types of scheme include a borrowing facility by the PFI, PPP lease provider and so the council is not required to separately borrow for these schemes. The council does not currently have any such schemes within the CFR.

	2020/21 Actual £000	2021/22 Estimate £000	2022/23 Estimate £000	2023/24 Estimate £000	2024/25 Estimate £000	2025/26 Estimate £000	2026/27 Estimate £000
Total CFR	11,261	11,165	11,069	10,973	10,877	10,787	10,713
Movement in CFR	-96	-96	-96	-96	-90	-74	-74

Movement in CFR represented by:							
	2020/21 Actual £000	2021/22 Estimate £000	2022/23 Estimate £000	2023/24 Estimate £000	2024/25 Estimate £000	2025/26 Estimate £000	2026/27 Estimate £000
MRP and other financing movements	96	96	96	96	90	74	74

2.3 Core funds and expected investment balances

The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year-end balances for each resource and anticipated day-to-day cash flow balances.

Year End Resources	2020/21 Actual £'000	2021/22 Estimate £'000	2022/23 Estimate £'000	2023/24 Estimate £'000	2024/25 Estimate £'000	2025/26 Estimate £'000	2026/27 Estimate £'000
Fund balances/ reserves	26,988	22,590	21,672	20,473	18,443	16,273	14,358
Capital receipts	823	704	704	704	704	704	704
Provisions	2,001	2,496	2,496	2,496	2,496	2,496	2,496
Other	0	0	0	0	0	0	0
Total core funds	29,812	25,790	24,872	23,673	21,643	19,473	17,558
Working capital*	3,023	3,023	3,023	3,023	3,023	3,023	3,023
Expected Investments	33,816	28,813	27,895	26,696	24,666	22,496	20,581

*Working capital balances shown are estimated year-end; these may be higher mid-year.

2.4 Minimum Revenue Provision Policy Statement

The council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision – MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision – VRP). DLUHC regulations have been issued which require the full council to approve an MRP Statement in advance of each year. The council is recommended to approve the MRP Statement at Appendix 4.

3. Borrowing

The capital expenditure plans set out in Section 2 provide details of the service activity of the council. The treasury management function ensures that the council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

3.1 The overall treasury management portfolio as at 31 March 2021 and for the position as at 21 February 2021 are shown below for both borrowing and investments.

Treasury Portfolio				
Treasury Investments	Actual	Actual	Current	Current
	31/03/2021	31/03/2021	21/02/2022	21/02/2022
	£000	%	£000	%
Banks	23,124	70%	33,435	57%
Money Market Funds	10,000	30%	25,000	43%
Total Treasury Investments	33,124		58,435	
External Borrowing	-1,552		-1,552	
Net Treasury Investments	31,572		56,883	

The council's forward projections for borrowing are summarised below. The table shows the actual external debt, against the underlying capital borrowing need, (the Capital Financing Requirement – CFR), highlighting any over or under borrowing.

	2020/21 Actual £000	2021/22 Est. £000	2022/23 Est. £000	2023/24 Est. £000	2024/25 Est. £000	2025/26 Est. £000	2026/27 Est. £000
External Debt at 1 April	1,552	1,552	1,552	1,552	1,552	1,552	1,552
Expected change in External Debt	0	0	0	0	0	0	0
Other Long Term Liabilities (OLTL)	7	50	50	50	50	50	50
Expected change in OLTL	0	0	0	0	0	0	0
Actual Gross Debt at 31 March	1,559	1,602	1,602	1,602	1,602	1,602	1,602
Capital Financing Req.	11,261	11,165	11,069	10,973	10,877	10,787	10,713
Under/ (over) Borrowing	9,702	9,563	9,467	9,371	9,275	9,185	9,111

Within the range of prudential indicators there are a number of key indicators to ensure that the council operates its activities within well-defined limits. One of these is that the council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2022/23 and the following two financial years. This allows some flexibility for limited early borrowing for future years but ensures that borrowing is not undertaken for revenue or speculative purposes.

The Corporate Director of Resources reports that the council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

3.2 Treasury Indicators: Limits to Borrowing Activity

The council is required to approve an 'authorised limit' and an 'operational boundary' for external debt. The Treasury Management indicators were approved by Cabinet at its meeting 16 February 2022 alongside the prudential indicators, capital expenditure plans and how these plans are being financed by capital or revenue resources.

The operational boundary. This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under-borrowing by other cash resources.

Operational boundary	2020/21 Estimate £000	2022/23 Estimate £000	2022/23 Estimate £000	2023/24 Estimate £000	2024/25 Estimate £000	2025/26 Estimate £000
Debt	13,452	13,452	13,452	13,452	13,452	13,452
Other long term liabilities	7	50	50	50	50	50
Total	13,459	13,502	13,502	13,502	13,502	13,502

The authorised limit for external debt. This is a key prudential indicator and represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but it not sustainable in the longer term.

1. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all council's plans, or those of a specific council, although this power has not yet been exercised.
2. The council is asked to approve the following authorised limit:

Authorised limit	2021/22 Estimate £000	2022/23 Estimate £000	2023/24 Estimate £000	2024/25 Estimate £000	2025/26 Estimate £000	2026/27 Estimate £000
Debt	20,000	20,000	20,000	20,000	20,000	20,000
Other long term liabilities	0	100	100	100	100	100
Total	20,000	20,100	20,100	20,100	20,100	20,100

3.3 Prospects for Interest Rates

The council has appointed Link Group as its treasury advisor and part of their service is to assist the council to formulate a view on interest rates. The following table gives their central view.

Annual Average % as at the quarter ending:	Bank Rate %	PWLB Rates % as at December 2021			
		5 year	10 year	25 year	50 year
March 2022	0.50	1.50	1.70	1.90	1.70
June 2022	0.50	1.60	1.80	2.00	1.80
Sept 2022	0.50	1.60	1.80	2.10	1.90
Dec 2022	0.50	1.70	1.90	2.10	1.90
March 2023	0.50	1.80	1.90	2.20	2.00
June 2023	0.75	1.80	2.00	2.20	2.00
Sept 2023	0.75	1.80	2.00	2.20	2.00
Dec 2023	0.75	1.90	2.00	2.30	2.10
March 2024	1.00	1.90	2.10	2.30	2.10
June 2024	1.00	1.90	2.10	2.40	2.20
Sept 2024	1.00	1.90	2.10	2.40	2.20
Dec 2024	1.00	2.00	2.20	2.50	2.30
March 2025	1.25	2.00	2.30	2.50	2.30

Over the last two years, the coronavirus outbreak has done huge economic damage to the UK and to economies around the world. After the Bank of England took emergency action in March 2020 to cut Bank Rate to 0.10%, it left Bank Rate unchanged at its subsequent meetings until raising it to 0.25% at its meeting on 16th December 2021.

As shown in the forecast table above, the forecast for Bank Rate now includes three increases, one in June 2023 to 0.75%, March 2024 to 1.00% and, finally, one in March 2025 to 1.25%.

Gilt yields / PWLB rates

Since the start of 2021, we have seen a lot of volatility in gilt yields, and hence PWLB rates. As the interest forecast table for PWLB certainty rates above shows, there is forecast to be a steady, but slow, rise in both Bank Rate and gilt yields during the forecast period to March 2025, though there will doubtless be a lot of unpredictable volatility during this forecast period.

While monetary policy in the UK will have a major impact on gilt yields, there is also a need to consider the potential impact that rising treasury yields in America could have on our gilt yields. As an average since 2011, there has been a 75% correlation between movements in US 10-year treasury yields and UK 10-year gilt yields. This is a significant upward risk exposure to our forecasts for longer term PWLB rates. However, gilt yields and treasury yields do not always move in unison.

US treasury yields. During the first part of 2021, US President Biden's, and the Democratic party's, determination to push through a \$1.9trn (equivalent to 8.8% of GDP) fiscal boost for the US economy as a recovery package from the Covid pandemic was what unsettled financial markets. However, this was in addition to the \$900bn support package already passed in December 2020. This was then followed by additional Democratic ambition to spend \$1trn on infrastructure (which was eventually passed by both houses later in 2021) and an even larger sum on an American families plan over the next decade; this is still caught up in Democrat / Republican haggling.

There are also possible downside risks from the huge sums of cash that the UK populace have saved during the pandemic; when savings accounts earn little interest, it is likely that some of this cash mountain could end up being invested in bonds and so push up demand for bonds and support their prices i.e., this would help to keep their yields down. How this will interplay with the Bank of England eventually getting round to not reinvesting maturing gilts and then later selling gilts, will be interesting to monitor.

As the US financial markets are, by far, the biggest financial markets in the world, any upward trend in treasury yields will invariably impact and influence financial markets in other countries. Inflationary pressures and erosion of surplus economic capacity look much stronger in the US compared to those in the UK, which would suggest that Fed rate increases eventually needed to suppress inflation, are likely to be faster and stronger than Bank Rate increases in the UK. This is likely to put upward pressure on treasury yields which could then spill over into putting upward pressure on UK gilt yields.

The forecasts are also predicated on an assumption that there is no break-up of the Eurozone or EU within the forecasting period, despite the major challenges that are looming up, and that there are no major

ructions in international relations, especially between the US and Russia, China / North Korea and Iran, which have a major impact on international trade and world GDP growth.

One of the key results of the pandemic has been a fundamental rethinking and shift in monetary policy by major central banks like the Fed, the Bank of England and the ECB, to tolerate a higher level of inflation than in the previous two decades when inflation was the prime target to bear down on so as to stop it going above a target rate. There is now also a greater emphasis on other targets for monetary policy than just inflation, especially on 'achieving broad and inclusive "maximum" employment in its entirety' in the US, before consideration would be given to increasing rates.

Investment and borrowing rates

- Investment returns are expected to improve in 2022/23. However, while markets are pricing in a series of Bank Rate hikes, actual economic circumstances may see the MPC fall short of these elevated expectations.
- Borrowing interest rates fell to historically very low rates as a result of the COVID crisis and the quantitative easing operations of the Bank of England and still remain at historically low levels. The policy of avoiding new borrowing by running down spare cash balances has served local authorities well over the last few years.
- Borrowing for capital expenditure. Link's long-term (beyond 10 years), forecast for Bank Rate is 2.00%. As some PWLB certainty rates are currently below 2.00%, there remains value in considering long-term borrowing from the PWLB where appropriate. Temporary borrowing rates are likely to remain near Bank Rate and may also prove attractive as part of a balanced debt portfolio. In addition, there are also some cheap alternative sources of long-term borrowing if an authority is seeking to avoid a "cost of carry" but also wishes to mitigate future re-financing risk.

3.4

Borrowing Strategy

The council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement) has not been fully funded with loan debt as cash supporting the council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue that needs to be considered.

Against this background and the risks within the economic forecast, caution will be adopted with the 2022/23 treasury operations. The

Corporate Director of Resources will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- if it was felt that there was a significant risk of a sharp fall in borrowing rates, then borrowing will be postponed.
- if it was felt that there was a significant risk of a much sharper rise in borrowing rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity, or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.

Any decisions will be reported to Council at the next available opportunity.

The council doesn't have any plans in the short to medium term to undertake any further borrowing.

3.5 Policy on borrowing in advance of need

The council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates and will be considered carefully to ensure that value for money can be demonstrated and that the council can ensure the security of such funds. Risks associated with any borrowing in advance of activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

3.6 Debt rescheduling

Rescheduling of current borrowing in our debt portfolio is unlikely to occur as there is still a very large difference between premature redemption rates and new borrowing rates, even though the general margin of PWLB rates over gilt yields was reduced by 100 bps in November 2020.

3.7 New Financial institutions as a source of borrowing and/or types of borrowing

Currently the PWLB Certainty Rate is set as +80 basis points for both Housing Revenue Accounts (HRA) and non-HRA borrowing. However, consideration may still need to be given to sourcing funding from the following sources for the following reasons:

- Local authorities (primarily shorter dated maturities out to 3 years or so – still cheaper than the Certainty Rate).
- Financial institutions (primarily insurance companies and pension funds but also some banks, out of forward dates where the

objective is to avoid a “cost of carry” or to achieve refinancing certainty over the next few years).

- Municipal Bonds Agency (possibly still a viable alternative depending on market circumstances prevailing at the time).

4. Annual Investment Strategy

4.1 Investment policy – management of risk

The Department of Levelling Up, Housing and Communities (DLUHC - this was formerly the Ministry of Housing, Communities and Local Government (MHCLG)) and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. This report deals solely with treasury (financial) investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy.

The council’s investment policy has regard to the following:

- DLUHC’s Guidance on Local Government Investments (“the Guidance”)
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 (“the Code”)
- CIPFA Treasury Management Guidance Notes 2021

The council’s investment priorities will be security first, portfolio liquidity second and then yield, (return). The council will aim to achieve the optimum return (yield) on its investments commensurate with proper levels of security and liquidity and with the council’s risk appetite. In the current economic climate it is considered appropriate to keep investments short term to cover cash flow needs.

The above guidance from the DLUHC and CIPFA places a high priority on the management of risk. This authority has adopted a prudent approach to managing risk and defines its risk appetite by the following means:

1. Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
2. Other information: ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the council will engage with its advisors to

maintain a monitor on market pricing such as “credit default swaps” and overlay that information on top of the credit ratings.

3. Other information sources used will include the financial press, share price and other such information pertaining to the financial sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
4. Types of investment instruments identified for use in the financial year are listed in Treasury Management Practices (TMP) Schedule 1 under the ‘specified’ and ‘non-specified’ investment categories.
5. Lending limits, (amounts and maturity), for each counterparty will be set through applying the matrix table in paragraph 4.2.
6. Transaction limits are set for each type of investment in 4.2.
7. Investments will only be placed with counterparties from countries with a specified minimum sovereign rating (see paragraph 4.3).
8. This authority has engaged external consultants (see paragraph 1.5) to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
9. All investments will be denominated in sterling.
10. As a result of the change in accounting standards for 2020/21 under IFRS 9, this authority will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, MHCLG concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years ending 31.3.23.)

However, this authority will also pursue value for money in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance (see paragraph 4.5). Regular monitoring of investment performance will be carried out during the year.

Changes in risk management policy from last year

The above criteria are unchanged from last year.

4.2

Creditworthiness Policy

This council applies the creditworthiness service provided by the Link Group. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody’s and Standard & Poor’s. The credit ratings of counterparties are supplemented with the following overlays:

- “watches” and “outlooks” from credit rating agencies;
- CDS spreads that may give early warning of changes in credit ratings;

- sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings and any assigned Watches and Outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads. The end product of this is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the council to determine the suggested duration for investments. The council will, therefore, use counterparties within the following durational bands:

- Yellow 5 years (only local authorities)
- Dark pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.25
- Light pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.5
- Purple 2 year
- Blue 1 year (only applies to nationalised or part nationalised UK Banks)
- Orange 1 year
- Red 6 months
- Green 100 days
- No colour not to be used

Organisation	Minimum credit criteria / colour band	Max. Amount per Institution	Max. maturity Period
Term deposits with UK Clearing Banks and UK Building Societies	Purple	£6m or **	Up to 2 years
	Blue	£6m or **	Up to 1 year*
	Orange	£6m or **	Up to 1 year
	Red	£6m or **	Up to 6 months
	Green	£6m or **	Up to 100 days
Term deposits with Other Banks	Orange	£6m or **	Up to 1 year
	Red	£6m or **	Up to 6 months
	Green	£6m or **	Up to 100 days
Certificates of Deposit with UK Clearing Banks and UK Building Societies	Purple	£6m or **	Up to 2 years
	Blue	£6m or **	Up to 1 year*
	Orange	£6m or **	Up to 1 year
	Red	£6m or **	Up to 6 months
	Green	£6m or **	Up to 100 days
UK Local Authorities	Yellow	£6m or **	Up to 5 years
		£6m or **	Up to 1 year

Ultra-Short Dated Bond with credit score of 1.25	Dark Pink / AAA	£6m or **	liquid
Ultra-Short Dated Bond with credit score of 1.5	Light Pink / AAA	£6m or **	liquid
Money Market Funds - CNAV, LVNAV or VNAV	AAA	£6m or **	liquid

*Part nationalised banks.

** £6m or 20% of investment balance per individual counterparty or 25% per whole counterparty group whichever is higher.

The Link creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

Typically, the minimum credit ratings criteria the council use will be a short-term rating (Fitch or equivalents) of F1 and a long-term rating of A. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances, consideration will be given to the whole range of ratings available, or other topical market information, to support their use.

All credit ratings will be monitored weekly. The council is alerted to changes to ratings of all three agencies through its use of the Link creditworthiness service.

- if a downgrade results in the counterparty / investment scheme no longer meeting the council's minimum criteria, its further use as a new investment will be withdrawn immediately.
- in addition to the use of credit ratings the council will be advised of information in movements in Credit Default Swap spreads against the iTraxx European Financials benchmark and other market data on a daily basis via its Passport website, provided exclusively to it by Link. Extreme market movements may result in downgrade of an institution or removal from the council's lending list.

Sole reliance will not be placed on the use of this external service. In addition this council will also use market data and market information, as well as information on any external support for banks to help support its decision making process.

Creditworthiness

Significant levels of downgrades to Short- and Long-Term credit ratings have not materialised since the crisis in March 2020. In the main, where they did change, any alterations were limited to Outlooks. However, as economies are beginning to reopen, there have been some instances of previous lowering of Outlooks being reversed.

CDS prices

Although bank CDS prices, (these are market indicators of credit risk), spiked upwards at the end of March / early April 2020 due to the heightened market uncertainty and ensuing liquidity crisis that affected financial markets, they have returned to more average levels since then. However, sentiment can easily shift, so it will remain important to undertake continual monitoring of all aspects of risk and return in the current circumstances. Link monitor CDS prices as part of their creditworthiness service to local authorities and the Council has access to this information via its Link-provided Passport portal.

4.3

Country limits

The council has determined that it will only use approved counterparties from the UK and from countries with a minimum sovereign credit rating of AA- from Fitch (or equivalent). The list of countries that qualify using this credit criteria as at the date of this report are shown in Annex 1. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.

4.4

Investment Strategy

In-House Funds

Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most cash balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed.

- If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term or variable.
- Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

Investment returns expectations

The current forecast shown in paragraph 3.3, includes a forecast for a first increase in Bank Rate in May 2022, though it could come in February.

The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows (the long term forecast is for periods over 10 years in the future):

Average earnings in each year	
2022/23	1.00%
2023/24	1.25%
2024/25	1.25%
2025/26	1.25%
2026/27	1.25%
Long term later years	2.00%

For its cash flow generated balances, the Council will seek to utilise its business reserve instant access and notice accounts, money market funds and short-dated deposits, (overnight to 100 days), in order to benefit from the compounding of interest.

4.5 Investment treasury indicator

There are currently no plans for funds to be invested for a period greater than 364 days. These limits are set with regard to the councils liquidity requirements and to reduce the need for early sale of an investment and are based on the availability of funds after each year end. For its cash flow generated balances, the council will seek to utilise its instant access and notice accounts, money market funds, short dated deposits (overnight to 100 days) and 6 month deposits in order to benefit from compounding of interest. This council will use an investment benchmark to assess the investment performance of its investment portfolio of 7 day LIBID (London Interbank Bid Rate).

4.6 End of year investment report

At the end of the financial year, the council will report on its investment activity as part of its Annual Treasury Report.

4.7 Non-treasury investments

This council recognises that investment in other financial assets and property primarily for financial return, taken for non-treasury management purposes, requires careful investment management. Such activity includes loans supporting service outcomes, investments in subsidiaries and investment property portfolios. This council does not currently have any such investments. However it will ensure that all of its investments are covered in the capital programme, investment strategy or equivalent and will set out, where relevant, the council's risk

appetite and specific policies and arrangements for non-treasury investments. It will be recognised that the risk appetite for these activities may differ from that of treasury management. The council will maintain a schedule setting out a summary of existing material investments, subsidiaries, joint ventures and liabilities including financial guarantees and the council's risk exposure where applicable.

Annex 1

Approved Countries for Investments (as at 18/02/2022)

This list is based on those countries which have sovereign ratings of AA- or higher, (we show the lowest rating from Fitch, Moody's and S&P) and also, (except - at the time of writing - for Hong Kong, Norway and Luxembourg), have banks operating in sterling markets which have credit ratings of green or above in the Link credit worthiness service.

Based on lowest available rating

AAA

- Australia
- Denmark
- Germany
- Netherlands
- Singapore
- Sweden
- Switzerland
- U.S.A

AA+

- Canada
- Finland

AA

- United Arab Emirates
- France

AA-

- Belgium
- Qatar
- U.K.

This page is intentionally left blank

MINIMUM REVENUE PROVISION POLICY STATEMENT 2022/23 (England and Wales)

1. The Council's Adopted Approach

The council implemented the new Minimum Revenue Provision (MRP) guidance in 2008/09 and will assess their MRP for 2022/23 in accordance with the main recommendations contained within the guidance issued by the Secretary of State under section 21(1A) of the Local Government Act 2003 and the revised guidance issued in 2018.

For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure and from 1 April 2008, for all unsupported borrowing (including PFI and finance leases) the policy will be Asset Life method. Capital expenditure will under delegated powers be charged over a period which is reasonably commensurate with the estimated useful life applicable to the nature of expenditure, using the equal annual instalment method (Asset Life Method). For example, capital expenditure on a new building, or on the refurbishment or enhancement of a building, will be related to the estimated life of that building.

Estimated life periods will be determined under delegated powers. To the extent that expenditure is not on the creation of an asset and is of a type that is subject to estimated life periods that are referred to in the guidance, these periods will generally be adopted by the council. However, the council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

As some types of capital expenditure incurred by the council are not capable of being related to an individual asset, asset lives will be assessed on a basis which most reasonably reflects the anticipated period of benefit that arises from the expenditure. Also, whatever type of expenditure is involved, it will be grouped together in a manner which reflects the nature of the main component of expenditure and will only be divided up in cases where there are two or more major components with substantially different useful economic lives.

A change introduced by the revised DLUHC MRP Guidance allowed any charges made over the statutory minimum revenue provision, voluntary revenue provision or overpayments, to be, if needed reclaimed in later years if deemed necessary or prudent. The council does not have any such overpayments.

This page is intentionally left blank

WYRE BOROUGH COUNCIL

CAPITAL STRATEGY

2022/23

CONTENTS

1.	INTRODUCTION	2
2.	KEY DOCUMENTS	3
3.	CAPITAL EXPENDITURE	3
4.	DEBT AND BORROWING AND TREASURY MANAGEMENT	6
5.	COMMERCIAL ACTIVITY	8
6.	OTHER LONG-TERM LIABILITIES	9
7.	KNOWLEDGE AND SKILLS	9
8.	THE FUTURE AMBITION OF THE COUNCIL'S CAPITAL PROGRAMME	10
9.	USEFUL LINKS	11
10.	APPENDICES	11

1.0	INTRODUCTION
1.1	<p>The Chartered Institute of Public Finance and Accountancy (CIPFA) revised the Prudential Code in December 2021 with immediate effect. A soft launch approach has been taken with formal adoption and reporting required from 2023/24. As such this version of the Capital Strategy will include some elements not yet adopted in order to signpost forthcoming changes.</p> <p>The updated Prudential Code 2021 requires local authorities to produce a capital strategy in order to demonstrate that the council does the following:</p> <ul style="list-style-type: none"> • takes capital and investment decisions in line with service objectives; • properly takes account of stewardship, value for money, prudence, sustainability and affordability; • sets out the long-term context in which capital expenditure and investment decisions are made; • gives due consideration to both risk and reward; • gives due consideration to the impact on the achievement of priority outcomes, and; • authorities should report on and clearly distinguish investments for treasury management, service and commercial purposes
1.2	The capital strategy forms part of the council's integrated revenue, capital and balance sheet planning.
1.3	The strategy is intended to give a high level overview of how capital expenditure, capital financing, investments and treasury management activity contribute to the delivery of the council's plans and provision of services along with an overview of how associated risk is managed and the implications for future financial sustainability.
1.4	The capital strategy should be tailored to the council's individual circumstances but should include capital expenditure, investments and liabilities and treasury management. The capital strategy should include sufficient detail to allow all members to understand how stewardship, value for money, prudence, sustainability, proportionality and affordability will be secured and to meet legislative requirements on reporting.
1.5	A long-term view is taken when outlining the capital strategy and its associated context, as many schemes will span a number of years and have implications beyond the Medium Term Financial Plan (MTFP). All planned capital expenditure and investment decisions are included in the strategy including those undertaken with external partners.

<p>1.6</p>	<p>CIPFA guidance indicates that the Capital Strategy should have regard to the following areas, each of which will be covered in this document:</p> <ul style="list-style-type: none"> • Capital expenditure • Debt, borrowing, investments and treasury management • Investments for commercial purposes • Other long-term liabilities • Knowledge and skills
<p>1.7</p>	<p>This document should be read in conjunction with the Council’s annual Treasury Management Policy Statement and Practices, Treasury Management and Annual Investment Strategy and the Minimum Revenue Provision Policy Statement. Reference may be made to specific sections of these documents as appropriate to avoid unnecessary duplication in the Capital Strategy.</p>
	<p>The Capital Strategy is reviewed annually and presented to full Council for approval.</p>
<p>2.0</p>	<p>KEY DOCUMENTS</p>
<p>2.1</p>	<p>Aside from the Treasury Management Policy Statement and Practices, Treasury Management and Annual Investment Strategy and the Minimum Revenue Provision Policy Statement, there are several key internal documents which influence the strategic direction of the council and these are listed below.</p> <ul style="list-style-type: none"> • The Business Plan which gets refreshed annually and has three themes around People, Place and Economy. • The Council’s Strategic Narrative which identifies three ‘big goals’ including commercial and environmental awareness, a flexible and change-ready workforce and providing an integrated and community-focused service offer. • The Commercial Strategy (see Appendix 1). • The Asset Management Strategy and Action Plan. • Also important are the main financial reports: the Statement of Accounts, the Medium Term Financial Plan (MTFP) and the Revenue Estimates and Capital Programme. <p>All of the above documents are available on the council’s website (for more details please see the latest versions at www.wyre.gov.uk).</p>
<p>3.0</p>	<p>CAPITAL EXPENDITURE</p>

<p>3.1</p>	<p>This section will cover the following areas identified by CIPFA guidance where their impact is material:</p> <ul style="list-style-type: none"> • An overview of the governance process for approval and monitoring capital expenditure. • A long-term view of capital expenditure plans, where long-term is defined by the financing strategy of and risks faced by the authority with reference to the life of the projects/assets (see Appendix 2). • An overview of asset management planning including the cost of past borrowing, maintenance requirements and planned disposals. • Any restrictions around borrowing or funding of ongoing capital finance.
<p>The Definition of Capital Expenditure</p>	
<p>3.2</p>	<p>The council has two types of expenditure as defined in the annual statement of accounts:</p> <ul style="list-style-type: none"> • <i>Revenue expenditure</i>: the everyday costs incurred with running the council such as employee costs, premises related expenditure and various supplies and services.
	<ul style="list-style-type: none"> • <i>Capital expenditure</i>: the more sizeable costs, which usually relate to the acquisition of new assets or significant enhancement of existing assets to extend the economic benefit to the council.
<p>3.3</p>	<p>In brief, there are three routes under which expenditure can qualify as capital and these are:</p> <ul style="list-style-type: none"> • Spending which meets the recognition criteria specified under 'proper accounting practices' e.g. expenditure on the acquisition of, construction of or the addition of subsequent costs to non-current assets (tangible e.g. buildings and intangible e.g. software) • Spending which meets one of the definitions specified in regulations made under the Local Government Act 2003 e.g. Revenue Expenditure Funded from Capital Under Statute (REFCUS). • The Secretary of State makes a direction that the spending can be treated as capital expenditure.
<p>3.4</p>	<p>Examples of capital expenditure include expenditure on the acquisition, reclamation or enhancement of assets (e.g. buildings, land, plant and machinery). It can include computer costs (for use over a period exceeding one year e.g. software), grants to third parties, incidental costs involved in a capital project (e.g. officers' salaries and professional fees).</p>
<p>3.5</p>	<p>Excluded from the definition of capital are training, administrative and other general overhead costs. Costs will also be ineligible to the extent that they relate to activity that takes place prior to the intention to acquire or construct a fixed asset. Examples of this include the cost of option appraisals and feasibility studies that do not contribute to the scoping of the asset ultimately acquired or constructed.</p>
<p>3.6</p>	<p>The key principle to follow is that 'everything is revenue unless you can prove it is capital'.</p>

	<p>The Capital Programme, Governance and Approval Process</p>
3.7	<p>The Capital Programme is the council's schedule of capital works for future years and includes details of the funding of the schemes. Included in the schedule are projects such as sea defences and beach management, restoration of parks and open spaces, our rolling replacement of vehicles, Fleetwood regeneration including project Neptune, and the construction of new buildings and facilities. Also included could be service and commercial investments such as new IT systems to deliver digital transformation, the purchase of land or buildings for investment purposes and design, consultancy or in-house fees for staff time in support of major schemes. The Council is working with partners to assist them to meet both their objectives and the Council's objectives.</p>
3.8	<p>The approval process for individual capital schemes and the Capital Programme itself can be found in the Council's Constitution which is available on the council's website. In summary, the majority of capital schemes are approved via a Portfolio Holder Report submitted to the relevant Portfolio Holder. Alternatively, where a key decision is involved, a Cabinet Report on a specific scheme or project is used to update the Capital Budget. Regular reports are also submitted to Cabinet throughout the year providing them with the latest current year Capital Budget position and its impact on the multi-year Capital Programme and requesting their approval for any changes. In February of each year the Cabinet formally approve the current revised and the future year's Capital Programme and this is subsequently ratified by full Council in March as part of the annual budget setting process.</p>
3.9	<p>Capital expenditure is prioritised based on a number of factors including the availability of external funding and any associated conditions, the availability of internal funding, Business, Service and Asset Management Plan priorities, health and safety, environmental sustainability, resources and capacity.</p>
3.10	<p>The council's MTFP will encompass the current year's budget plus four years and the Capital Programme will mirror this approach. Reference will also be made to years beyond the scope of the MTFP period where the expected lifespan of planned projects exceeds this timeframe.</p>
	<p>Asset Management</p>
3.11	<p>The Asset Management Strategy and Action Plan provides an overview of the council's current position with regard to investment properties, surplus assets, planned maintenance and investment projects and so on. The latest detailed Asset Management Strategy and Action Plan can be found on the council's website.</p>
3.12	<p>In order to achieve our corporate vision, key work areas have been established for Asset Management, these are:</p> <ul style="list-style-type: none"> • Managing Investment Assets • Managing Property Assets • Property Maintenance

- Property Disposals
- Property Acquisitions

3.13 The Council’s property portfolio largely falls under two main categories: Property Assets and Investment Property.

The breakdown of property categories is as shown below:

Category	Number	Asset Value (31/03/2021)
Property Assets	69	£41.5m
Investment Assets	51	£11.0m
Community Assets	103	£5.6m
Heritage Assets	4	£0.3m
Assets Held for Sale	0	£0m
TOTAL	225	£58.4m

Long-Term Borrowing

3.14 In an effort to reduce the council’s reliance on borrowing and following concerns about the sustainability of continuing to borrow in the current economic climate, a Capital Investment Reserve was created as part of the 2009/10 closure of accounts. The council has the following outstanding long term borrowing:

Date	Loan ref.	Value (£)	Period (Years)	Rate (%)	Maturing
05/03/2008	494404	552,000	30	4.48	September 2037
05/03/2008	494405	1,000,000	50	4.41	September 2057
Total		1,552,000			

Significant Property Acquisitions and Disposals

3.15 Acquisition - During 2021/22 Cabinet approved the acquisition of new fish and food processing units in Fleetwood (Project Neptune). These are expected to be completed in May 2022. Tenants are entering lease agreements and the units are expected to be fully let.

Disposal – During 2021/22 Cabinet approved the disposal of land at Bourne Hill, Thornton and the site is expected to complete in May 2022, generating a capital receipt.

4.0 DEBT, BORROWING, INVESTMENTS AND TREASURY MANAGEMENT

4.1 This section will cover the following areas identified by CIPFA guidance where their impact is material:

- A long-term projection of external debt (ie gross borrowing plus other long-term liabilities).
- Provision for the repayment of debt over the long-term, having regard to statutory guidance on MRP or the repayment of loans fund advances.
- Authorised limit and operational boundaries for the following year.

	<ul style="list-style-type: none"> • The authority’s approach to treasury management including processes, due diligence and defining the authority’s risk appetite. • A projection of investments (where material) analysed between investments for treasury management purposes and commercial purposes (including commercial property). • A statement of whether the authority has complied with paragraphs 51 to 53 of the Prudential Code in relation to investments for commercial purposes, in particular the requirement that an authority must not borrow to invest for the primary purpose of financial return.
	<p>Capital Investments vs. Treasury Management, Service and Commercial Investments</p>
<p>4.2</p>	<p>‘Treasury Management Activities’ are defined by CIPFA as:</p> <p><i>“The management of the organisation’s borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”</i></p> <p>‘Investments for treasury management purposes’ (or treasury management investments) are those investments that arise from the organisation’s cash flows or treasury risk management activity, and ultimately represent balances that need to be invested until the cash is required for use in the course of business.</p> <p>‘Investments for commercial purposes’ (or commercial investments) are taken or held primarily for financial return and are not linked to treasury management activity or directly part of delivering services.</p> <p>‘Investments for service purposes’ (or service investments) are taken or held primarily and directly for the delivery of public services (including housing, regeneration and local infrastructure) or in support of joint working with others to deliver such services.</p>
<p>4.3</p>	<p>Unlike capital investments, for treasury management investments the security and liquidity of funds is placed ahead of any investment return.</p>
<p>4.4</p>	<p>The council recognises that investment in other financial assets and property primarily for financial return, taken for non-treasury management purposes, requires careful investment management. Such activity includes loans supporting service outcomes and investment property portfolios. The council currently has no commercial or service investments and does not borrow to invest for the primary purpose of financial return.</p>
<p>4.5</p>	<p>The council will ensure that all of its investments are covered in the capital strategy, investment strategy or equivalent, and will set out, where relevant, the council’s risk appetite and specific policies and arrangements for non-treasury investments. It will be recognised that the risk appetite for these activities may differ from that for treasury management.</p>

4.6	Capital investments should be proportional to the level of resource available to the council and the council should ensure that the same robust procedures for the consideration of risk and return are applied to these decisions.
Capital Resources and Financing Strategy	
4.7	Wyre’s Capital Programme has always relied heavily on external funding owing to limited internal resources and a desire not to add to existing levels of external borrowing. The council has external funding levels of 77% (estimated 2021/22) of the total capital programme. Much of this has been provided by the Environment Agency for large scale sea defences and beach management schemes but other externally funded works include Disabled Facilities Grants (Better Care Fund) and funding towards the new fish and food processing units in Fleetwood.
4.8	As a result of central government funding cuts and a significant gap to bridge in our ongoing revenue estimates, there is limited scope for the council to contribute monies from general balances without additional compensating savings being identified. Likewise, the shortfall in ongoing funding means that it is not prudent to add to our external borrowing unless a compelling ‘invest to save’ case exists.
4.9	Several earmarked reserves exist to support capital investment and these include the Capital Investment, Leisure Management, IT Strategy, Value For Money, Vehicle Replacement/Street Cleansing Maintenance and the Property Investment Fund Reserves.
4.10	<p>The Capital Programme assumes available funding from the following sources:</p> <ul style="list-style-type: none"> • Capital grants and contributions • Capital receipts from the sale of assets • Earmarked reserves • Revenue contributions • Internal borrowing • External borrowing
4.11	Ordinarily, capital receipts can only be used to fund capital expenditure or be set aside to repay debt. However, as part of the multi-year 2016/17 local government finance settlement, greater flexibility to allow council’s to use these receipts to generate ongoing revenue efficiencies was announced although conditions apply including the requirement for a Strategy approved by full Council.
4.12	“The Guidance recommends that the Strategy setting out details of projects to be funded through flexible use of capital receipts be prepared prior to the start of each financial year. Failure to meet this requirement does not mean that an authority cannot access the flexibility in that year. However, in this instance, the Strategy should be presented to full Council or the equivalent at the earliest possible opportunity.”

4.13	At the present time, there is no intention to make use of this flexibility owing to the significant schedule of works required to maintain and invest in our assets and as such no Strategy has yet been approved by Council.
5.0	COMMERCIAL ACTIVITY
5.1	<p>This section will cover the following areas identified by CIPFA guidance where their impact is material:</p> <ul style="list-style-type: none"> • The authority's approach to commercial activities including processes ensuring effective due diligence and defining the authority's risk appetite in respect of these, including proportionality in respect of overall resources. • Requirements for independent and expert advice and scrutiny arrangements.
5.2	The council's Commercialisation Strategy 2018 – 2023 can be found at Appendix 1 to this report. It was previously approved as part of the Capital Strategy by full Council and minor updates have been made.
5.3	<p>As local authorities become increasingly complex and diverse it is vital that those charged with governance understand the long-term context in which investment decisions are made and all the financial risks to which the authority is exposed. The impact of commercialisation has widened the scope of local authority powers and with the introduction of arrangements such as combined authorities it is no longer sufficient to consider only the individual local authority but also the residual risks and liabilities to which it is subject.</p> <p>Authorities may invest in other financial assets, including loans and property primarily for financial return, which are not part of treasury management activity.</p> <p>Other investments may include:</p> <ul style="list-style-type: none"> • 'service investments' held clearly and explicitly in the course of the provision – and for the purposes – of operational services, including regeneration • 'commercial investments' which are taken for mainly financial reasons, including investments arising as part of business structures, such as shares and loans in subsidiaries or other outsourcing structures such as IT providers or building services providers; or investments explicitly taken with the aim of making a financial surplus for the organisation; commercial investments also include non-financial assets which are held primarily for financial return such as investment properties.
5.4	Investigations into policy driven initiatives and investments are allowed under the Capital and Investment Strategies under the delegated authority of the S.151 Officer. The authority currently has no material commercial activity and none is forecast in the current capital programme.

<p>5.5</p>	<p>Expert advice will be sought, including legal and financial, where required for any service or commercial investments. Commercial activity is not risk-free, even where no or cheap external borrowing is used.</p> <ul style="list-style-type: none"> • All decisions to incur expenditure and to borrow must be backed by effective legal powers, which might not be available. There is an additional problem in that these decisions may subsequently be invalidated by changes in statutory provisions or developments in case law. • The authority's returns (income and capital gains) are at risk, while, once incurred, borrowing costs are unavoidable. A reduction in returns could put the authority's revenue account into deficit. There are risks in relation to the fair value of the property on the balance sheet, for example, where the commercial property fair value is less than the value of the debt liability. • Assuming the investment is purchased at market prices, the extra margin or return must reflect additional risk.
<p>6.0</p>	<p>OTHER LONG-TERM LIABILITIES</p>
<p>6.1</p>	<p>This section will cover the following areas identified by CIPFA guidance where their impact is material:</p> <ul style="list-style-type: none"> • An overview of the governance process for approval and monitoring and ongoing risk management of any other financial guarantees and other long-term liabilities.
<p>6.2</p>	<p>Liabilities related to the Defined Benefit Pension Scheme are excluded from this definition related to treasury management.</p>
<p>6.3</p>	<p>The Authority, as a lessee, does not have any finance leases or operating leases of notable value. A review of forthcoming changes under IFRS16, currently expected to be deferred again, is being undertaken and this may alter the position but the impact is still being evaluated.</p>
<p>7.0</p>	<p>KNOWLEDGE AND SKILLS</p>
<p>7.1</p>	<p>This section will cover the following areas identified by CIPFA guidance where their impact is material:</p> <ul style="list-style-type: none"> • A summary of the knowledge and skills available to the authority and confirmation that these are commensurate with the authority's risk appetite.
	<p>Officer Training</p>
<p>7.2</p>	<p>The training needs of treasury management officers are reviewed throughout the year and additionally when the responsibilities of staff members change or there is staff turnover. Training records are held centrally for audit purposes.</p>

7.3	Staff are encouraged to view webinars and/or attend training courses, seminars and conferences held by Link Group, Treasury Solutions Limited, CIPFA and other appropriate bodies. Relevant staff are encouraged to study professional qualifications from CIPFA and other appropriate organisations.
7.4	Day-to-day treasury management staff and the S.151 Officer attend an annual strategy meeting with Link Group, Treasury Solutions Limited. Their expertise is available throughout the year and utilised by relevant staff as and when required.
Member Training	
7.5	The CIPFA Code requires the responsible officer to ensure that Members with responsibility for treasury management receive adequate training in treasury management. This especially applies to Members responsible for scrutiny.
7.6	An annual training session is held for members of the Overview and Scrutiny Committee (O&S) in particular. This is either delivered in-house by the responsible officer at a suitable O&S meeting or provided by the council's external treasury management consultants, usually by way of an evening briefing available to all Members. Refer to the Treasury Management Policy Statement and Practices, Treasury Management and Annual Investment Strategy for more details.
Treasury Management Consultants	
7.7	<p>The council uses Link Group, Treasury Solutions Limited external treasury management advisors.</p> <p>The council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external providers.</p> <p>It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.</p>
8.0	THE FUTURE AMBITION OF THE COUNCIL'S CAPITAL PROGRAMME
8.1	The Capital Strategy is a high level overview which over time will be developed to reflect the Council's emerging risk appetite, strategic influences and overall capital ambitions.
8.2	A key part of the evolution of the Capital Strategy will be the determination of the Council's capital ambition and an important element of this will relate to the adopted Local Plan (Council, 28 February 2019). This document contains the following Vision Statement (further detail is available on our website at www.wyre.gov.uk):

	<p>“By 2031 Wyre will be recognised as an aspirational place with a clear focus on delivering sustainable growth – balancing environmental, social and economic considerations. It will be an attractive and successful place focused on creating opportunities for people to live, work, visit and do business. Development will have achieved high quality urban and rural environments, whilst respecting the diverse distinctiveness of local character across the Borough.”</p>
8.3	<p>This vision will inform the starting point for further investigations and research into the current economic position in Wyre, including a focus on our high streets and how we can use council assets and further investment using the Property Investment Fund to promote regeneration.</p>
8.4	<p>Wyre has a strong track record of attracting external investment through successful funding bids and benefactor donations. Recently this has included substantial investment in new fish and food processing units in Fleetwood and successful bids for Heritage Action Zone funding from Historic England as well as significant Environment Agency investment in sea defences and beach management schemes.</p>
8.5	<p>During 2022/23 further work will continue, initially by Corporate Management Team, to explore the scope of a longer term vision for the borough and how the Council can help to shape and support this through capital investment. The Council has declared a Climate Emergency and the Business Plan focus has shifted to focus on achieving net zero carbon by 2050 with a target reduction of 78% by 2035. A funding bid for decarbonisation work at Fleetwood Market has just been successful and approval of a scheme is expected to follow in due course.</p>
9.0	<p>USEFUL LINKS</p>
9.1	<p>The following documents can all be found on the Wyre Council website: www.wyre.gov.uk.</p>
9.2	<ul style="list-style-type: none"> • Asset Management Strategy and Action Plan • Business Plan • Treasury Management Policy Statement and Practices and Treasury Management and Annual Investment Strategy and Minimum Revenue Provision Policy Statement • Medium Term Financial Plan • Revenue Estimates and Capital Programme • Local Plan
10.0	<p>APPENDICES</p>
10.1	<p>The following appendices are included for information:</p> <ul style="list-style-type: none"> • Appendix 1 – Commercialisation Strategy • Appendix 2a and 2b – Capital Strategy - Long Term Forecast

Wyre Council - Commercialisation Strategy 2018/19 to 2022/23

Background and Commercial Vision

In December 2016, the Council adopted a new Strategic Narrative, which sets out a clear vision and goals for evolving the way that Wyre council works. This was refreshed in 2019.

The Strategic Narrative contains three big goals and these are:

- An integrated and community-focused service offer.
- A flexible and change-ready workforce.
- Commercial and Environmental awareness is embedded in everything we do.

Focusing on the third big goal around commercial awareness, the narrative commits that:

- We will implement new ways to replenish dwindling government funding for local authorities. Our employees will be commercially minded, able to identify and maximize commercial opportunities. We will be mindful of our climate change commitment in everything we do and ensure that the council's activities are net-zero carbon by 2050.

Our approach will include:

- **Maintaining financial discipline.** We will be financially astute delivering quality services, in conjunction with partners, on time and on budget. Our Medium Term Financial Plan and Efficiency Programme will be aligned with our Business Plan to ensure our objectives and priorities are properly resourced and funded appropriately.
- **Bringing commerciality into everyday thinking.** We will bring commerciality into everyday working across the organisation through improved procurement practices, better contract management and a focus on delivering established financial goals.

At Wyre, commercialisation is a broad term used to capture all aspects of service reviews and redesign, the commissioning cycle, shared and multi-partner organisation joined-up services, income generation and general efficiencies.

Key Drivers

The council has a forecast budget gap of £3.2m in 2026/27 (as at February 2022) largely owing to central government cuts and this financial position necessitates our becoming more commercial in our approaches to procurement, contract management and the delivery and marketing of our services.

There is renewed interest in inter-Council arrangements with other local authorities as financial pressures increase. The same applies to other public sector partners who are similarly looking at the advantages, both financial and operational, of delivering services together on a shared footprint to make efficiencies.

Wyre's ultimate goal is achieving sustainability without the need for central government grant support and successes reported by other councils are building confidence in the sector that this is possible.

The introduction of our new appraisal 1-2-1s and 1-2-1+ are embedding the strategic vision and driving forward the 'One Team One Council, 'Working Collaboratively' and 'Work Smart' values throughout the workforce.

Annual benchmarking of services has highlighted areas for further investigation where our unit costs appear high compared to both our 'nearest neighbour' group and the national average. This analysis will prompt more detailed reviews of high unit cost areas to identify potential savings.

Core principles of Commercialisation at Wyre Council

Commercialisation at Wyre Council encompasses the following approaches:

- Selling and Marketing our Services
- Fees and Charges
- Smart Procurement
- Improved and Continuous Contract Management
- Multi-partner Collaboration and Shared Services
- Maximising our Assets
- Investments
- Generating Efficiencies
- Digital Transformation
- Civic Crowdfunding

This strategy allows for all services to participate (or elements of services) and encourages a diverse range of approaches.

The principles of commercialisation include:

- Be open to all options for service delivery
- Be willing to take risks – allow for failure as well as success
- Be open and honest about current performance
- Follow financial regulations
- Be prepared to invest now for a return in the future

Links to other Wyre Council Strategies and key documents include the following:

- Wyre Council Business Plan
- Medium Term Financial Strategy
- Procurement Guide for Staff

- Commercial Advice for Staff
- Digital Transformation Strategy
- Annual Fees and Charges review
- Annual Benchmarking Report

Aims and Objectives

Essentially, the strategy aims to deliver a financial return, which contributes to closing the growing funding gap currently forecast to be £3.2m in 2026/27 (as at February 2022).

This will entail developing a programme of work based on:

- business cases put forward throughout the year;
- business plan programmes and projects;
- external funding bids;
- fees and charges reviews;
- marketing our services and assets
- training and development of staff to grow our in-house commercialism skills;
- the creation of cross-directorate working groups to take shortlisted projects forward; and,
- harnessing Wyre's unique selling points including our capital assets, a brand that people trust and detailed local knowledge.

Creating the right culture and environment

Careful consideration will be given to nurturing the positive, 'can do' culture within Wyre in order to encourage innovative ideas and develop them into robust project proposals. This will involve the following activities:

- Undertaking a staff development programme to support our vision and goals;
- Holding regular staff briefings (at least once a year) and cascading updates to teams during the year via Core Brief
- Adopting a project management approach for the implementation of the programme and promoting the new online resources for generating project proposals;
- Ensuring new proposals have the right support from the Senior Leadership Team and necessary stakeholders.

Outcomes

The approach taken in this strategy will ensure that positive outcomes are delivered including:

- A real, tangible opportunity to make a contribution to the Medium Term Financial Plan;
- Staff development – new skills will be acquired and can be transferred to other opportunities internally;
- Enhancing Wyre Council's reputation as a leading-edge authority in this sphere;

- Developing the organisation into a more innovative workplace, building on successes so far;
- Bringing benefits to the local economy;
- Ensuring the sustainability of non-statutory services that would otherwise be stopped due to lack of funding.

Criteria for Selecting Investment Assets

An initial Pass/Fail test will apply to all investment property acquisitions:

1. Owing to the council's requirement to generate income through a satisfactory level of return, the net initial yield (NIY) range that we could expect to achieve on the investment is likely to be between 5% and 7%. The NIY allows for the cost of purchase including agent's fees, surveys and stamp duty and should exceed a minimum level of 5% to qualify. (To **calculate net initial yield**, you need to deduct all the expenses (ongoing costs + cost of vacancy) from the annual rental income (weekly rent x 52). You then divide that number by the property's purchase price (including associated cost of purchase expenses) and times it by 100. This will give you the percentage yield.)
2. Whilst borrowing is not currently planned to finance the purchase of investment property, if it is undertaken then all investments must initially provide income equal to or above the council's required rate of return (ROR) defined by the cost of capital borrowing for purchase.

Any asset meeting the above criteria will be eligible to pass to the next stage for consideration. Any assets which do not meet the above criteria will not be considered further.

Following the initial Pass/Fail test, for eligible assets, a more detailed evaluation criteria will then apply accompanied by a business case co-ordinated by the Head of Built Environment.

Capital Scheme	Funded By	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
		£	£	£	£	£	£	£	£	£	£
Playground Refurbishment Unallocated	Capital Receipts	10,242									
Jubilee Gardens Refurbishment	Capital Receipts	7,000									
Tebay Playground Refurbishment	Capital Receipts	7,000									
Preesall Playing Fields Environmental Improvements	Grants and Contributions	71,307									
Kings George Playing Fields Phase 3	Grants and Contributions	10,678									
Forton Village Hall & Recreation Ground Play Area Improvements	Grants and Contributions	50,769									
Queen Elizabeth II Playing Field, Catterall Improvements	Grants and Contributions	65,748									
Restoration of the Mount	Grants and Contributions	78,493									
Cell Eleven Monitoring	Grants and Contributions	23,410	23,410	23,410	23,410	23,410					
Rossall Sea Wall Improvement Works	Grants and Contributions	208,432									
Wyre Beach Management	Grants and Contributions	1,440,781	6,981,014	12,260,109	12,260,109	8,926,998					
Innovative Resilience Fund ECO-CoBS	Grants and Contributions	493,000									
Disabled Facilities Mandatory Grants	Grants and Contributions	2,963,108	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964
Empty Homes Delivery	Grants and Contributions	17,049									
Vehicle Replacement/Str. Cleansing Mtnc	Revenue - Vehicle Replacement Reserve	411,519	155,200	149,500	302,500	215,000	404,500	404,500	3,200,000	404,500	404,500
Citizen Access Portal	Revenue - Value For Money Reserve	62,417									
Cash Receipting System Upgrade	Revenue - Value For Money Reserve	24,746									
Replacement of Core IT Network Infrastructure	Revenue - IT Strategy Reserve	38,800									
Virtual Desktop Infrastructure Storage Area Network	Revenue - IT Strategy Reserve	30,704									
St Chad's Churchyard Boundary Wall Works	Revenue - Capital Investment Reserve	59,750									
Fleetwood Market Security Improvements	Revenue - Capital Investment Reserve	55,440									
Project Neptune - Getting Building Fund LEP Grant	Grants and Contributions	4,030,385									
Acquisition of fish and food processing commercial units	Grants and Contributions / Revenue - Property Investment Reserve	4,194,917									
CCF5 Fleetwood Market Outdoor Area/Digital Signage	Grants and Contributions/ Revenue - Capital investment Reserve	48,553									
Fleetwood HAZ	Grants and Contributions	638,350	855,000	214,656							
TOTAL		15,042,598	10,094,588	14,727,639	14,665,983	11,245,372	2,484,464	2,484,464	5,279,964	2,484,464	2,484,464
Funding Sources											
		2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
		£	£	£	£	£	£	£	£	£	£
Grants and Contributions		11,525,563	9,939,388	14,578,139	14,363,483	11,030,372	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964
Revenue - Capital Investment Reserve		129,690									
Revenue - IT Strategy Reserve		69,504									
Revenue - Vehicle Replacement Reserve		411,519	155,200	149,500	302,500	215,000	404,500	404,500	3,200,000	404,500	404,500
Revenue - Value For Money Reserve		87,163									
Revenue - Property Investment Reserve		2,794,917									
Capital Receipts		24,242									
Loan											
TOTAL		15,042,598	10,094,588	14,727,639	14,665,983	11,245,372	2,484,464	2,484,464	5,279,964	2,484,464	2,484,464
Please note:- Purple text indicates externally funded schemes											
NOTE: The above assumes Disabled Facilities Grants will continue to be funded at the same level. An estimate of the rolling programme of vehicle replacements has been used to provide a forecast.											
As such not all works or funding have been approved and both are subject to change.											

This page is intentionally left blank

Capital Scheme	Funded By	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2041/42
		Budget	Budget	Budget	Budget	Budget	Budget	Budget	Budget	Budget	Budget
		£	£	£	£	£	£	£	£	£	£
Playground Refurbishment Unallocated	Capital Receipts										
Jubilee Gardens Refurbishment	Capital Receipts										
Tebay Playground Refurbishment	Capital Receipts										
Preesall Playing Fields Environmental Improvements	Grants and Contributions										
Kings George Playing Fields Phase 3	Grants and Contributions										
Forton Village Hall & Recreation Ground Play Area Improvements	Grants and Contributions										
Queen Elizabeth II Playing Field, Catterall Improvements	Grants and Contributions										
Restoration of the Mount	Grants and Contributions										
Cell Eleven Monitoring	Grants and Contributions										
Rossall Sea Wall Improvement Works	Grants and Contributions										
Wyre Beach Management	Grants and Contributions										
Innovative Resilience Fund ECO-CoBS	Grants and Contributions										
Disabled Facilities Mandatory Grants	Grants and Contributions	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964
Empty Homes Delivery	Grants and Contributions										
Vehicle Replacement/Str. Cleansing Mtnce	Revenue - Vehicle Replacement Reserve	404,500	404,500	404,500	404,500	404,500	3,360,000	404,500	404,500	404,500	404,500
Citizen Access Portal	Revenue - Value For Money Reserve										
Cash Receipting System Upgrade	Revenue - Value For Money Reserve										
Replacement of Core IT Network Infrastructure	Revenue - IT Strategy Reserve										
Virtual Desktop Infrastructure Storage Area Network	Revenue - IT Strategy Reserve										
St Chad's Churchyard Boundary Wall Works	Revenue - Capital Investment Reserve										
Fleetwood Market Security Improvements	Revenue - Capital Investment Reserve										
Project Neptune - Getting Building Fund LEP Grant	Grants and Contributions										
Acquisition of fish and food processing commercial units	Grants and Contributions / Revenue - Property Investment Reserve										
CCF5 Fleetwood Market Outdoor Area/Digital Signage	Grants and Contributions/ Revenue - Capital investment Reserve										
Fleetwood HAZ	Grants and Contributions										
TOTAL		2,484,464	2,484,464	2,484,464	2,484,464	2,484,464	5,439,964	2,484,464	2,484,464	2,484,464	2,484,464
Funding Sources		2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2041/42
		Budget	Budget	Budget	Budget	Budget	Budget	Budget	Budget	Budget	Budget
		£	£	£	£	£	£	£	£	£	£
Grants and Contributions		2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964	2,079,964
Revenue - Capital Investment Reserve		0	0	0	0	0	0	0	0	0	0
Revenue - IT Strategy Reserve		0	0	0	0	0	0	0	0	0	0
Revenue - Vehicle Replacement Reserve		404,500	404,500	404,500	404,500	404,500	3,360,000	404,500	404,500	404,500	404,500
Revenue - Value For Money Reserve		0	0	0	0	0	0	0	0	0	0
Revenue - Property Investment Reserve		0	0	0	0	0	0	0	0	0	0
Capital Receipts		0	0	0	0	0	0	0	0	0	0
Loan		0	0	0	0	0	0	0	0	0	0
TOTAL		2,484,464	2,484,464	2,484,464	2,484,464	2,484,464	5,439,964	2,484,464	2,484,464	2,484,464	2,484,464
Please note:- Purple text indicates externally funded schemes											
NOTE: The above assumes Disabled Facilities Grants will continue to be funded at the same level. An estimate of the rolling programme of vehicle replacements has been used to provide a forecast.											
As such not all works or funding have been approved and both are subject to change.											

Page 18 of 20

This page is intentionally left blank