Report of the Resources and Personnel Policy Portfolio Holder

TREASURY MANAGEMENT AND PRUDENTIAL INDICATORS ANNUAL REPORT FOR THE YEAR ENDED 31 MARCH 2022

1. Purpose of report

To inform the Cabinet of treasury management activity and the actual prudential indicators for 2021/22.

2. Recommendation

Cabinet is asked to NOTE the Treasury Management and Prudential Indicators Annual Report for the year ended 31 March 2022.

3. Detail

This report meets the requirements of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. The Council is required to comply with both Codes through regulations issued under the Local Government Act 2003.

During 2021/22 the minimum reporting requirements were that an annual treasury management strategy be approved in advance of the year, a mid-year report and finally an annual report be produced following the year describing the activity compared to the strategy. This report fulfils this requirement.

The CIPFA Code of Practice on Treasury Management required the Section 151 Officer to operate the treasury management function in accordance with the Treasury Management Strategy approved at the Council meeting of 4 March 2021. Details of all borrowing and investment transactions for 2021/22 together with the balances at 31 March 2022 and treasury management limits on activity are also provided in appendix 1. All treasury management activities undertaken during the year complied fully with the CIPFA Code of Practice on Treasury Management and the approved treasury management strategy.

Under the CIPFA Prudential Code for Capital Finance in Local Authorities, the Council is required to prepare a number of prudential indicators against which treasury management performance should be measured. Performance against the prudential indicators is given in appendix 2.

The CIPFA Prudential Code for Capital Financing in Local Authorities was revised in December 2017 and introduced a requirement for the production of a Capital Strategy. This is considered alongside the Treasury Management Strategy Statement and the Investments Strategy by this Committee as part of the Budget Proposals and Associated Strategies report each year before being presented to full Council for approval in March.

4. Financial Implications

The comments from the Head of Finance Services were as follows:

This report meets the requirements of the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. All treasury management activities undertaken during the year complied fully with the CIPFA Code of Practice on Treasury Management and the approved Treasury Management Strategy. Further comments are incorporated in the narrative in the executive summary and appendices.

5. Legal Implications

The comments from the Head of Legal Services and Deputy Monitoring Officer were as follows:

Treasury Management activities have to conform to the Local Government Act 2003, the Local Authorities (Capital; Finance and Accounting) (England) Regulations 2003 (SI 2003/3146), which specifies that the Council is required to have regard to the CIPFA Prudential Code and the CIPFA Treasury Management Code of Practice and also the Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2008 (SI 2008/414), which clarifies the requirements of the Minimum Revenue Provision guidance. This report demonstrates compliance with the legislative framework.

6. Human Resources Implications

There were no comments from the Human Resources Manager.

7. Union Comments

There were no comments from UNISON.

8. Data Protection Compliance Implications

There are no Data Protection issues in relation to this report.

9. Equality Impact Assessment

As there is no change to policy an equality impact assessment is not required.

10. Background Papers

Nil

APPENDIX 1

TREASURY MANAGEMENT ACTIVITY 2021/22

1. Borrowing

a) Debt Outstanding and Transactions during the Year

The amount of loan debt outstanding as at 31 March 2022, together with comparative figures for 31 March 2021, is summarised in the table below:

	Amount Outstanding at 31-Mar-21 £	Amount Outstanding at 31-Mar-22 £
Short Term Loans	23,785,728	10,058,236
Long Term Loans:		
Public Works Loan Board	74,327,519	82,643,348
Local Authorities	0	0
Barclays Bank	3,000,000	3,000,000
TOTAL	**101,113,247**	**95,701,584**

b) Short Term Loans

The movement in short term loans from other local authorities during the year is set out in the table below:

Lender	Balance at 31-Mar-21 £'000	Start Date	End Date	Rate %	Balance at 31-Mar-22 £'000
Merseyside Fire and Rescue Service	2,000	05-May-20	04-May-21	0.90	-
Somerset County Council	2,000	06-Aug-20	06-May-21	0.60	-
North of Tyne Combined Authority	2,000	30-Sep-20	29-Sep-21	0.55	-
South Derbyshire District Council	2,000	06-Oct-20	06-Apr-21	0.10	-
Shropshire & Wrekin Fire Authority	2,000	11-Nov-20	11-May-21	0.10	-
Merthyr Tydfil Council	3,000	05-Feb-21	05-Aug-21	0.04	-
Liverpool Combined Council	5,000	01-Mar-21	01-Sep-21	0.10	-
Shropshire & Wrekin Fire Authority	-	11-May-21	11-Nov-21	0.04	-

Lender	Balance at 31-Mar-21 £'000	Start Date	End Date	Rate %	Balance at 31-Mar-22 £'000
Vale of Glamorgan Council	-	24-Mar-22	22-Dec-22	0.95	2,000
Bedford Borough Council	-	28-Mar-22	28-Jun-22	0.75	1,000
Nottingham City Council	-	28-Mar-22	28-Sep-22	0.85	2,000
TOTAL	**18,000**				**5,000**

Short term loans outstanding at 31 March 2022 included £544,078 invested with the Council by the Bramcote Crematorium Joint Committee. The equivalent figure was £275,121 as at 31 March 2021.

Short term loans outstanding at 31 March 2022 also include nominal PWLB annuities totalling £12,895. The equivalent figure at 31 March 2021 was £11,625.

c) Long Term Loans

The majority of the loans from the PWLB is comprised of the £61.446m borrowed on 28 March 2012 as part of the reform of council housing finance.

New long-term loans received from the PWLB in 2021/22 was comprised of £13.0m being made up of four loans borrowed on 6 October 2021(£5.0m), 15 December 2021(£2.0m), 8 March 2022(£3.0m) and 9 March 2022(£3.0m).

There is a movement of £4.5m in the long term PWLB loans which reflects the re-classification of long-term loans to short term at 31 March 2022 as they will be repaid within the next 12 months.

The Council also has a loan of £3.0m at 4.19% with Barclays Bank that is due to mature on 4 February 2073.

d) Borrowing Strategy 2021/22

Overall, debt was kept under review in order to match the level of borrowing with the financing requirement for assets, based on analysis of the Council's balance sheet with the aim of maintaining the Council's borrowing at the most efficient level in line with the prudential framework for capital finance.

The approved budget for 2021/22 indicated that further borrowing of £7.543 million would be required to help fund the 2021/22 capital programme. A total of £18.0 million of additional borrowing was actioned with the potential need for additional funds re-profiled in line with a revised capital programme in the medium term.

e) Debt Profile

The Council's debt had an average of 8.00 years to maturity at 31 March 2022, compared to 7.03 years on 31 March 2021. The average interest rate payable in the year was 3.07% (2020/21 2.93%).

The one-off preferential rates offered by the PWLB for the £66.446m additional loans taken out in March 2012 continue to have a substantial impact upon both the average interest rate payable and the debt profile.

f) Debt Restructuring

The Deputy Chief Executive and Section 151 Officer, in association with the Council's treasury management advisors, carefully scrutinises the Council's loan portfolio to identify potential opportunities to achieve a reduction in risks and/or savings in interest costs by prematurely repaying loans and refinancing them on similar or different terms.

No suitable debt restructuring opportunities were identified in 2021/22 as the cost associated with premiums payable on the premature repayment of loans, ranging from 5% to 97% of the loan principal amount, could not be offset by lower refinancing rates.

2. Investments

a) Investment Policy

The Council's investment policy is governed by Central Government guidance and was incorporated in the annual Investment Strategy approved at the Finance and Resources Committee meeting on 11 February 2021. The investment activity during 2021/22 conformed to the approved strategy with security of capital being the Council's main investment objective.

Counterparty credit quality was assessed and monitored with reference to credit ratings and other available information. The minimum long-term counterparty credit rating determined for the 2021/22 investment strategy was A- (or equivalent) across the Fitch, Standard and Poor and Moody's credit rating agencies.

In keeping with Central Government guidance, the Council sought to maintain a sufficient level of liquidity through the use of money market funds (MMF) and overnight deposit and call accounts. The Council had no liquidity difficulties in 2021/22.

The Council attempted to optimise returns commensurate with its objectives of security and liquidity.

b) Interest Received

The total interest receivable for the year amounted to £221,882 (compared to £265,165 in 2020/21). This includes the following long-term investments of:

- Interest of £73,053 from a £2 million investment in the CCLA Local Authorities Property Fund (LAPF) (£80,048 2020/21)
- Interest of £50,716 from a £2 million investment in the CCLA Diversified Income Fund (£65,610 2020/21)
- Interest of £72,193 from a £2 million investment in the Ninety-One Diversified Income Fund (£47,601 2020/21).

The table in 3d) includes details of the changes in the average life of investments during 2021/22.

The average interest rate received on investments in 2021/22 was 1.26% (1.06% in 2020/21). The United Kingdom bank rate remained at 0.75% for the year which was reflected in short-term money market rates with a corresponding impact on investment income. The rates of return on investments also continues to reflect the priorities of security and liquidity before yield.

c) Investments Placed

A summary of all investments placed in 2021/22 is set out below.

	Average Credit score	Balance at 01-Apr-21 £000s	Investment Made £000s	Investment Repaid £000s	Balance at 31-Mar-22 £000s	Increase/ (Decrease)
UK Banks and Building Societies						
Santander UK	A+	3,000	8,274	(11,274)	0	(3,000)
Bank of Scotland	A+	3,000	-	(3,000)	0	(3,000)
Local Authorities	A+	0	-	-	0	0
Money Market Funds						
Aberdeen	AAA	379	26,732	(22,111)	5,000	4,621
Insight	A+	0	-	-	0	0
Legal & General (LGIM)	AAA	0	7,750	(7,750)	0	0
Federated	AAA	0	8,300	(6,570)	1,730	1,730
Public Sector Deposit Fund	AAA	1,873	13,937	(10,810)	5,000	3,127
Other Funds						
Royal London Enhanced Cash Plus Fund	AA	2,000	0	0	2,000	0

	Average Credit score	Balance at 01-Apr-21 £000s	Investment Made £000s	Investment Repaid £000s	Balance at 31-Mar-22 £000s	Increase/ (Decrease)
Ninety One Diversified Income Fund	AA	2,000	0	0	2,000	0
CCLA Diversified Income Fund	AA	2,000	0	0	2,000	0
CCLA Property Fund	AA	2,000	0	0	2,000	0
Total		**16,252**	**64,993**	**(61,515)**	**19,730**	**3,478**

Investments with counterparties such as the Money Market Funds are set up as individual accounts where funds can be placed short-term (often overnight) and monies withdrawn as and when required. This increases the volume and value of investments made with these institutions during the year.

Money Market Fund credit ratings are indicative only due to the disparate investment strategies utilised by the funds.

d) Credit Score Analysis

Counterparty credit quality has been maintained in accordance with the Treasury Management Strategy approved by the Finance and Resources Committee on 11 February 2021 and confirmed by Council on 4 March 2021.

No investments were made with institutions where the credit rating exceeded a score of 7. All deposits were made with institutions achieving an average score of 5 or better.

Long-Term Credit Rating	Score
AAA	1
AA+	2
AA	3
AA-	4
A+	5
A	6
A-	7
BBB+	8
BBB	9
BBB-	10

3. Treasury Management Limits on Activity

There are four treasury management indicators that were previously prudential indicators. The indicators are:

- Upper limits on fixed rate exposure – This indicator identifies a maximum limit for fixed interest rates based upon the debt position net of investments.
- Upper limits on variable rate exposure – Similar to the previous indicator this covers a maximum limit on variable interest rates.

- Maturity structures of fixed rate borrowing – These gross limits are set to reduce the Council’s exposure to large fixed rate sums falling due for refinancing and are required for upper and lower limits.

- Total principal funds invested for periods longer than one year – These limits aim to reduce the risk of long-term investments needing to be realised before their natural maturity dates due to cash flow requirements, which could result in the investment being realised when market conditions are unfavourable.

The purpose of these indicators is to contain the activity of the treasury function within certain limits, thereby reducing the risk of an adverse movement in interest rates impacting negatively on the Council’s overall financial position.

	2021/22 Planned Upper		2021/22 Actual 31-Mar-22	
Limits on fixed interest rates	100%		90%	
Limits on variable interest rates	40%		10%	
Maturity Profile of Borrowings	Lower	Upper	Lower	Upper
Under 12 months	0%	50%	0%	10%
12 months to 2 years	0%	50%	0%	8%
2 years to 5 years	0%	50%	0%	26%
5 years to 10 years	0%	75%	0%	41%
10 years to 20 years	0%	100%	0%	6%
20 years to 30 years	0%	100%	0%	2%
30 years to 40 years	0%	100%	0%	3%
40 years to 50 years	0%	100%	0%	0%
50 years and above	0%	100%	0%	3%

The CIPFA Prudential Code for Capital Finance in Local Authorities requires indicators to be set for the maturity structure of fixed borrowing only. The above limits applied equally to total borrowing (fixed and variable borrowing).

As suggested in the CIPFA Code of Practice on Treasury Management, all investments (whether fixed or variable rate) with a period of less than twelve months to maturity are regarded as variable rather than fixed rate investments as they are potentially subject to movements in interest rates when they mature. Likewise, any fixed rate borrowing that is due to mature within twelve months is regarded as being at a variable rate as the rate to be paid on any replacement loan could differ from the rate currently being paid.

With regard to the total principal funds invested, the investment strategy 2021/22 proposed that investments would only be made with those institutions on the counterparty list that were viewed as presenting the least risk.

At 31 March 2022 the Council's investments with a duration more than one-year totalled £8 million. This consisted of £2 million invested in the Royal London Enhanced Cash Plus Fund; £2 million in the CCLA Local Authorities Property Fund (LAPF); £2 million in the CCLA Diversified Income Fund; and £2 million in the Ninety-One Diversified Income Fund.

4. Regulatory Framework, Risk and Performance

The Council has complied with all of the relevant statutory and regulatory requirements which require the Council to identify and, where possible, quantify the levels of risk associated with its treasury management activities. In particular, the Council's adoption of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities means that its capital expenditure is prudent, affordable and sustainable and that its treasury management practices demonstrate a low risk approach.

5. Money Market Brokers

The Treasury Management Strategy Statement 2021/22 to 2023/24 approved by Finance and Resources Committee on 11 February 2021 and by Council on 4 March 2021 included details of the external money market brokers to be used by Treasury Management.

- Tradition (UK) Limited of Beaufort House, 15 St Botolph Street, London EC3A 7QX
- Sterling International Brokers of 1 Churchill Place, Canary Wharf, London. E14 5RD
- Martins Brokers (UK) Limited of 20th Floor, 1 Churchill Place, Canary Wharf, London E14 5RD
- King and Shaxson Limited of 6th Floor, 120 Cannon Street, London. EC4N 6AS
- Imperial Treasury Services of 25 St Andrew Street, Hertford. SG14 1HZ

APPENDIX 2

PRUDENTIAL INDICATORS 2021/22

1. Introduction

The Local Government Act 2003 requires local authorities to comply with the CIPFA Prudential Code for Capital Finance in Local Authorities when carrying out their capital budgeting and treasury management activities. Fundamental to this is the calculation of a number of prudential indicators, which provide the basis for the management and monitoring of capital expenditure, borrowing and investments. The indicators are based on the Council's planned and actual capital spending.

2. Capital Expenditure and Financing 2021/22

The Council undertakes capital expenditure on assets which have a long term value. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.) which has no resulting impact upon the Council's borrowing need; or

- If insufficient financing is available or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

The actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed.

	2020/21 Actual £000s	2021/22 Actual £000s
General Fund	10,352	4,166
HRA	6,373	9,863
Total Capital Expenditure	**16,725**	**14,029**
Financed by:		
Capital Receipts	4,077	1,200
Capital Grants	1,980	959
Revenue	4,607	6,435
Unfinanced Capital Expenditure	**6,061**	**8,594**

Further details of capital expenditure are included in the Statement of Accounts Update and Outturn Position 2021/22 report elsewhere on this agenda.

3. The Council's Overall Borrowing Need

The Council's underlying need to borrow is called the Capital Financing Requirement (CFR). This figure is a gauge of the Council's debt position and represents net capital expenditure in 2021/22 and prior years that has not yet been paid for by revenue or other resources.

Part of the Council's treasury management activity seeks to address this borrowing need, either through borrowing from external bodies or utilising temporary cash resources within the Council.

Whilst additional borrowing can be undertaken or existing loans repaid at any time within the confines of the treasury management strategy, the Council is required by statute to make an annual revenue charge to reduce the CFR. This charge is effectively a repayment of the General Fund borrowing need and is known as the minimum revenue provision (MRP).

The total CFR can also be reduced by the application of additional capital resources (such as unapplied capital receipts); or charging more than the MRP statutory revenue charge each year through a voluntary revenue provision (VRP)

The Council's 2021/22 MRP Policy (as required by Central Government guidance) was approved at the Finance and Resources Committee meeting on 11 February 2021. For expenditure incurred before 1 April 2008, the General Fund MRP was based upon 4% of the CFR at that date utilising a reducing balance approach. For all unsupported borrowing incurred from 1 April 2008, the MRP was based upon the estimated life of the assets that the borrowing was intended to finance using an annuity based, as opposed to equal instalment, approach to more accurately reflect the time value of money.

There is no statutory requirement to charge MRP to the HRA. However, an authority can charge VRP to the HRA should it wish to do so. The Council meeting on 11 February 2021 determined that no VRP was to be charged to the HRA in 2021/22.

The Council's CFR for 2021/22 represents a key prudential indicator and is shown below.

Capital Financing Requirement (CFR)	General Fund £'000	HRA £'000	Total £'000
Opening Balance at 1 April 2021	**19,629**	**81,267**	**100,896**
Add: Unfinanced Capital Expenditure 2021/22	4,163	1,421	5,584
Less: MRP/VRP in 2021/22	(1,125)	0	(1,125)
Closing Balance at 31 March 2022	**22,667**	**82,688**	**105,355**

4. Treasury Position as at 31 March 2022

Whilst the Council's gauge of its underlying need to borrow is the CFR, the Section 151 Officer can manage the Council's actual borrowing position by either:

- Borrowing to the CFR; or
- Choosing to utilise some temporary internal cash flow funds in lieu of borrowing (under borrowing); or
- Borrowing for future increases in the CFR (borrowing in advance of need)

The figures in this report are based upon the principal amounts borrowed and invested and so may differ from those in the final accounts by items such as accrued interest.

The Section 151 Officer managed the debt position in 2021/22 by, on occasions, choosing to utilise some temporary internal cash flow funds in lieu of additional borrowing.

The borrowing position at 31 March 2022 compared with the previous year was:

Actual Borrowing Position	Principal 31-Mar-21 £000s	Av. Rate	Principal 31-Mar-22 £000s	Av. Rate
Fixed Interest Rate Debt	101,044	3.01%	95,158	3.31%
Variable Interest Rate Debt	0	-	0	-
Total Debt	**101,044**	**3.01%**	**95,158**	**3.31%**
Capital Financing Requirement				
CFR – General Fund	24,856		22,667	
CFR – HRA	81,267		82,688	
Total Capital Financing Requirement	**106,123**		**105,355**	
Over/(Under) Borrowing	**(5,079)**		**(10,197)**	

5. Prudential Indicators and Compliance Issues

Some of the prudential indicators provide either an overview or specific limits on treasury management activity. These are as follows:

i) Gross Borrowing and the Capital Financing Requirement (CFR)

In order to ensure that over the medium term gross borrowing will only be for a capital purpose, the Council needs to ensure that its gross borrowing does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional increases to the CFR for the current 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 purposes. The table below highlights the Council's gross borrowing position against the CFR.

	31-Mar-21 Actual £'000	31-Mar-22 Actual £'000
Gross Borrowing		
- PWLB and Market	100,769	95,158
- Bramcote Crematorium	275	940
Gross Borrowing Position	**101,044**	**96,098**
Capital Financing Requirement (CFR)		
CFR – General Fund	24,856	22,667
CFR – HRA	81,267	82,688
Total CFR	**106,123**	**105,355**

The Deputy Chief Executive and Section 151 Officer can report that gross borrowing was below the CFR at 31 March 2022 as it was at 31 March 2021. Gross borrowing in terms of PWLB loans remained largely unchanged throughout the year with the only movement being the repayment of some PWLB annuity loans. There was an overall increase of £3 million in market loans during 2020/21 and maturing loans were replaced throughout the year. As set out in appendix 1, the additional borrowing undertaken in 2021/22 was intended to bring greater alignment between the overall borrowing level and the Council's underlying need to borrow as measured by the CFR. The decrease in borrowing from Bramcote Crematorium over 2020/21 reflects the reduction in available surplus when compared with the previous year.

The CFR increase shown here is analysed in section 3 above.

As stated above, gross borrowing at 31 March 2022 was below the CFR and it is anticipated that gross borrowing will continue to be below the CFR over the current and following two financial years. Any borrowing decisions will take account of the effect upon the total CFR.

ii) <u>Authorised Limit and Operational Boundary for External Debt</u>

The authorised limit is a statutory limit determined under section 3(1) of the Local Government Act 2003 and represents the limit beyond which borrowing is prohibited. It reflects the level of borrowing which could be afforded in the short term to maximise treasury management opportunities and cover temporary cash flow shortfalls, but is unlikely to be sustainable over the longer term. The table below demonstrates that during 2021/22 the Council has maintained gross borrowing within its authorised limit.

The operational boundary is based on the probable external debt during the course of the year. The operational boundary is not a limit and actual borrowing can vary around the levels shown for short times. The operational boundary should act as an indicator to ensure the authorised limit is not breached and is a key management tool for in year monitoring of treasury management activities by the Section 151 Officer.

Actual external debt is gross borrowing plus other long-term liabilities. As mentioned previously, gross borrowing includes sums invested with the Council by Bramcote Crematorium. Other long-term liabilities are liabilities outstanding (other than borrowing) in relation to the financing of capital expenditure. They relate to, for example, private finance initiative (PFI) credits or finance leases. The Council did not have such long-term liabilities at 31 March 2022 or at any stage during 2021/22.

	Operational Boundary 31-Mar-22 £000	Authorised Limit 31-Mar-22 £000	Actual External Debt 31-Mar-22 £000
Borrowing	101,200	126,500	95,158
Other Long-Term Liabilities	0	0	0
Total	**101,200**	**126,500**	**95,158**

The Deputy Chief Executive and Section 151 Officer reports that there were no breaches of the authorised limit during 2021/22. The maximum level of borrowing during 2021/22 was £101 million.

iii) Total Principal Sums Invested for More than One Year

This limit is intended to contain exposure to the possibility of any loss that may arise as a result of the Council having to seek early repayment of any investments made. If an investment has to be re-paid before its natural maturity date due to cash flow requirements then, if market conditions are unfavourable, there could be an adverse impact upon the Council.

The Council's policy for 2021/22 as set out in the annual investment strategy was to retain the flexibility to invest a proportion of its available balances for a period in excess of one year should credit conditions continue to show signs of stabilisation or improvement. An estimated amount of £8 million was identified in the strategy as being available for longer term investment. Details of sums invested over more than 1 year are identified in section 4 of appendix 1

iv) The Ratio of Financing Costs to Net Revenue Stream

This indicator as shown in the table below compares net financing costs (borrowing costs less investment income) to net revenue income from business rates, council tax and rent income. The purpose of the indicator is to show how the proportion of net income used to pay for financing costs is changing over time.

	2020/21 Actual	2021/22 Actual
General Fund	13.2%	13.4%
HRA	15.2%	14.8%

General Fund performance reflects the cost of borrowing being broadly similar between 2020/21 and 2021/22. The revenue outturn report for 2021/22 identifies a significant underspend which increases the proportion of budget required for financing costs. HRA revised figures included a level of capital funding from revenue that was not required in year due to a re-profiling of the medium term capital programme.

6. Prudential Code for Capital Finance in Local Authorities

The Prudential Code for Capital Finance in Local Authorities has been subject to various reviews and consultations mainly in respect of borrowing for investment and yield. Exploratory activity is now complete and a revised Code is due to be published in December 2022. The financial implications of the revised Code as applicable to the Council will be reported to Members later in 2022.