

**CAPITAL STRATEGY**

**2019/20 – 2023/24**

**December 2018**

Index Page

1. Purpose 3
2. Scope 3
3. Capital Expenditure and Investment 3
4. Links to Other Corporate Strategies and Plans 4
5. External Drivers 5
6. Setting the Capital Budget 5
7. Performance Monitoring 10
8. Outline of the Gateway Review Process 11
9. Options Appraisals, Feasibility Studies and the Gateway Review Process 12
10. Capital Funding 13
11. Financial Assessment of Business Cases 17
12. Property Investments 20
13. Loans to Companies 21
14. Risk Management 23
15. Other Considerations 25

# Appendices

Appendix 1 – Capital Scheme and Major Projects Appraisal Structure 26

Appendix 2 – Capital Scheme and Major Projects Appraisal Process 27

Appendix 3 – Customer Involvement in Capital Schemes and Major Projects 33

Appendix 4 – Budget Prioritisation 34

Appendix 5 – Investment Properties 35

**Capital Strategy**

1. **Purpose**
	1. The Council’s Constitution requires the Head of Financial Services to prepare a Capital Strategy which:
		1. Sets out the principles the Council will follow in its capital planning.
		2. Outlines the methodology for inclusion of schemes within the Capital Programme.
		3. Sets out the arrangement for management of capital schemes.
		4. Identifies the capital schemes to be undertaken over the following four financial years and how those schemes will be funded.
	2. The Chartered Institute of Public Finance and Accountancy (CIPFA) Prudential code also requires local authorities to produce a capital strategy from 2019/20 onwards. The strategy demonstrates how the Council ensures that capital expenditure decisions are taken in line with desired outcomes and consider stewardship, value for money, prudence, sustainability and affordability.
	3. The Capital Strategy document is a key document for the Council and forms part of the Council’s integrated revenue, capital, treasury and balance sheet planning. It is a high level document that provides an overview of how capital expenditure and capital financing contribute towards the delivery of desired outcomes. To facilitate this it summarises the Council’s approach to capital investment and lays out the means by which capital schemes are prepared, evaluated and monitored and the governance processes around this. It also includes a narrative of how risks associated with capital expenditure are managed.
2. **Scope**

2.1 The Capital Strategy covers all capital expenditure and capital investment decisions for the Council and also those entered into under Group arrangements. The Capital Strategy specifically excludes all investments that are entered into under Treasury Management powers; these are covered in the Treasury Management Strategy. The Treasury Management Strategy also includes the policy around borrowing to finance capital expenditure.

1. **Capital Expenditure and Investment**
	1. Capital expenditure and investment seeks to provide long-term solutions to Council priorities and operational requirements. Expenditure for capital purposes therefore gives rise to new assets, increases the value and/or useful life of existing assets or, generates an income stream to the Council via non treasury investments.
	2. The following principles have been adopted which are in accordance with CIPFA’s new Treasury Management Code of Practice:
* The Council recognises that capital investment in other financial assets and property primarily for financial return and not treasury management purposes, e.g. loans to companies in support of service outcomes and investment property portfolios require careful management and monitoring
* The Council ensures that all of its non-treasury investments are covered by its Capital Strategy, and sets out, where relevant, the Council’s risk appetite and specific policies and arrangements for its non-treasury investments. The risk appetite for these activities may differ from that for treasury management
* The Council has compiled a schedule setting out a summary of its existing material investments and liabilities including financial guarantees together with the Council’s associated risk exposure
1. **Links to Other Corporate Strategies and Plans**

4.1 The Council has an overarching view of its future direction, Oxford2050, which was extensively consulted upon prior to being finalised. This vision can be found on the website:

[**https://oxford2050.com/**](https://oxford2050.com/)

4.2 The Vision has 5 overarching themes:

* Work and learning
* People and communities
* Built and natural environment
* Transport and connectivity
* Culture and leisure

4.3 Supplementing this, the Council has a Corporate Plan which sets out the Council’s vision and priorities for the City.

[**Oxford City Council Corporate Plan, 2016–2020**](https://www.oxford.gov.uk/download/downloads/id/1756/corporate_plan_2016-20.pdf)

4.4 The Council’s Corporate Plan 2016-2020 sets out the following five strategic priorities:

* + **A Vibrant and Sustainable Economy**

A smart and entrepreneurial city with a thriving local economy supported by improved infrastructure, training and skills**.**

* + **Meeting Housing Needs**

Improving Oxford residents’ access to affordable and high-quality homes in good environments that are close to jobs and facilities.

* + **Strong, Active Communities**

Socially cohesive and safe communities

* + **Clean and Green Oxford**

An attractive and clean city that minimises its environmental impact by cutting carbon waste and pollution

* + **Efficient, Effective Council**

A customer focused organisation delivering efficient high quality services that meet people’s needs

4.5 An annual statement is then produced:

[**Oxford City Council Corporate Plan Annual Statement 2017/18**](https://www.oxford.gov.uk/download/downloads/id/4710/corporate_plan_annual_statement_2017-18.pdf)

The annual statement describes the achievements of the past year in each of the Corporate Plan areas and identifies where the Council will focus its priorities in the remaining period of the Corporate Plan (i.e. 2018–2020).

* 1. Aligned to the Corporate Plan are a number of subsidiary and complementary plans and strategies. Examples include:
* Medium Term Financial Plan
* Asset Management Plan
* Regeneration Framework
* Treasury Management Strategy
* Oxford Transport strategy
* Housing Strategies
* Green Spaces Strategy
* Community Centres Strategy
* Culture Strategy
* Digital Strategy
* Customer Contact Strategy
* Service Plans

4.7 The operation of all of these strategies and plans is underpinned by the Council’s Constitution, in particular the Contract Procedure Rules and the Financial Regulations. Capital resources are directed to those projects that optimise the achievement of the overall outcomes as set out in these strategies and plans. The processes adopted are designed to ensure that this happens.

1. **External Drivers**

5.1 In addition to the Council’s own priorities external influence may impact on capital decisions, for example central government, Growth Board and local enterprise partnership (LEP) priorities and funding requirements and the influence of demographic and legislative changes.

1. **Setting the Capital Budget**

**6.1 Identifying Capital Expenditure / Investment Need**

The need for a capital project may be identified through one or more of the following processes:

* Service areas prepare plans for the delivery and improvement of their services which align with the overall desired outcomes of the Council; these may identify any capital investment needed to meet future service outcomes;
* The Asset Management Plan and associated property management processes highlight deficiencies in the condition, suitability and sufficiency of the Council’s existing property portfolio and identify future areas of need;
* Housing Management highlight deficiencies in the condition, suitability and sufficiency of the Council’s existing housing stock and identifies future areas of need;
* The need to respond to Government initiatives and new laws and regulations;
* The need to generate a revenue income to contribute to the delivery of desired outcomes.

**6.2 Assessing Capital Expenditure / Investment Need**

6.2.1 Due to competing demands for limited resources, the Council prioritises capital investment based on a number of different factors such as:

* Its contribution to corporate priorities
* Necessity both in terms of physical Health and Safety and also software security
* The extent to which it facilitates delivery of statutory or non-statutory services
* The ability of the project to leverage additional funding, or secure a future income stream
* The affordability of the revenue implications of the project
* The risk of undertaking / not undertaking the capital expenditure

6.2.2 For capital expenditure in relation to loans to companies and investment in property funds these are assessed on the ability to provide an income return to the Council. This is assessed on a risk based approach compared to financial return.

* 1. **Environmental Considerations in Capital Decision Making**

6.3.1 There are many benefits to including sustainability or environmental criteria in the decision-making process when it comes to allocating capital resources.

6.3.2 “Green” or sustainable procurement can help to develop markets for environmentally sound products and services, thereby encouraging the market to develop a more sustainable approach which should encourage the further development of sustainable products and services.

6.3.3 One of our key priorities already demands a reduction of up to 5% carbon emissions’ on installed measures. Project Managers are encouraged to consider the installation of measures which are both energy efficient and low on carbon emissions in the capital projects for which they are responsible.

6.3.4 In making loans to companies in which it has an interest, the Council will seek to use its influence to ensure that appropriate environmental considerations are reflected in the entities it is lending to.

* 1. **Key Questions**

6.4.1 The Prudential Code asks three key questions of any investment decision:

* + - is it prudent;
		- is the scheme affordable; and
		- will it prove to be sustainable?

**Prudence**

* + 1. Prudence is a difficult concept to define. In deciding whether an investment decision is prudent there should as a minimum be an initial consideration of the relationship between:
* the capital cost and
* the business cost (being the revenue costs associated with the use of the asset).

6.4.3 The authority needs to consider whether this choice represents the best use of resources having looked at all available options: will buying the cheapest now prove to be a false economy? Above all, the authority should be confident that the preferred option is the best value for money, and the quality is sufficient to meet the Council’s needs.

6.4.4 Prudence and value for money are also key considerations when deciding whether to loan monies to new companies, this will include security of the loan and the likely pay back period and length of the loan.

6.4.5 Investments in property funds are seen as medium to long term investments therefore the value for money is assessed on this basis to ensure that over a longer period of time the investment is value for money and provides a return to the Council.

**Affordability**

6.4.6 The question of affordability in relation to capital projects is easier to address as the list of cost components is easier to define. Whilst the list is not exhaustive it will typically include:

|  |  |
| --- | --- |
| **Capital Costs** | **Revenue costs** |
| Feasibility costs | Ongoing rental charges |
| Initial build/purchase | Ongoing facilities management charges |
| Disposal/demolitions/de-commissioning costs | Utilities costs |
| Project management costs internal and external | Maintenance (planned and reactive) |
| Fees: Surveyors, Clerk of works | Financing costs |
| Loans to companies | Staffing implications |
| Investments in property funds | Business Rates |

6.4.7 Feasibility costs may be capitalised provided the scheme leads to the eventual construction of an asset, if not, any such costs incurred must be charged to revenue.

6.4.8 Affordability in respect of investments in property funds wil be a judgement as to whether the return after taking account of the cost of capital is sufficient.

6.4.9 Affordability in respect of investments in companies will need to consider the contribution towards the Councils Corporate Objectives as well as the financial return and potential dividend.

**Sustainability**

6.4.10 The third question the Code poses relates to sustainability. In assessing whether an investment is sustainable, the authority should consider:

* + - how it fits into any future policy or environmental framework
		- the future availability of resources to implement and continue to maintain any capital asset arising
		- the potential for changes in the need for the asset, e.g. demographic developments
		- the potential for changes in the nature of the driver, problem, or policy the capital expenditure is seeking to address.
		- The security on loans made
		- The liquidity of investments
		- The whole life costs of the project
	1. **Assessing the Impact of Capital Investment on Overall Finances**

6.5.1 The assessment of schemes will ensure that the relationship between capital accounting, capital and revenue expenditure and treasury management are considered by identifying the impact that capital investment decisions have on the finances of the authority overall and the relative impact on the General Fund and Housing Revenue Accounts.

6.5.2 The process of adhering to a strict option appraisal methodology and setting prudential indicators will clearly illustrate the revenue impact of capital investment decisions. As well as identify alternative solutions.

* 1. **Prioritising Investment**

6.6.1 The Capital Strategy plays an important role in the Council’s service planning and budget process. Capital Expenditure projects are prioritised and ranked through a scoring methodology aligned to a Capital Gateway framework that ensures capital resources are specifically targeted towards schemes that best meet and deliver the Council’s corporate objectives. The process includes the production of fully costed business case. Approved schemes are subsequently monitored to ensure delivery is on time, within budget and meets the projects objectives. More detail on this is shown in Section 7.

6.6.2 Capital Investments projects such as Loans to companies and Investment in property funds are assessed differently, as these are prioritised based on the investment return that will be received back to the Council. When considering loans to companies the Council will consider any Business Plans available to ensure that the investment is sound and that the Councils money is secure. When considering a full review of the fund is undertaken examining factors such as rate of return, size of the fund, type and location of property, investors in the fund, the credentials of the fund manager and their view of risk, past track record and property void rates. More detail on this is shown in Sections 12 and 13.

* 1. **How Schemes Get Included in the Capital Programme**

6.7.1 The Council believes that capital programme delivery is essential to support the services that the Council provides to its customers. To this end a new Project Management Office and associated Project Development Team have been constituted and resourced. The Project and Gateway Process has subsequently been fully reviewed and revised.

6.7.2 All capital schemes and major projects are assessed and filtered by the Project Management Office prior to being passed through to the Operational Delivery Group or the Development Board and then through to Corporate Management Team. The structure of the bodies involved in capital scheme appraisal can be seen in diagrammatic form in Appendix 1.

6.7.3 Once schemes have been approved through the Project and Gateway Process (outlined in Section 8 and shown in more detail in Appendix 2) they will be presented to Members for inclusion into the draft capital programme which is considered alongside the draft Medium Term Financial Plan. Final approval of the capital programme will be at the Council meeting in February of each year.

6.7.4 As part of the process of producing a list of potential schemes for the capital programme service managers must complete option appraisals to determine the most cost effective way to optimise the desired outcomes.

6.7.5 Capital schemes and adjustments to capital scheme budgets can be added to the capital programme during the year, however this will be by exception and will still need pre-approval through the Project and Gateway Process prior to being submitted to Members.

6.7.6 It is recognised that there needs to be a process whereby the Council’s customers can have input into what is needed for the City. The outline of how the Council seeks to accommodate this is shown in Appendix 3.

1. **Performance Monitoring**

**Council in-house Capital Schemes.**

7.1 Capital expenditure is reviewed for its legitimacy in meeting the definition of a capital purpose and reconciled monthly. Monthly monitoring meetings are held between Responsible Officers allocated to deliver capital projects and finance staff. For larger projects this may mean the setting up of a Project Board with officers and advisors covering a variety of expertise, chaired by a lead officer who is responsible for the delivery of the project.

7.2 All responsible officers and project managers can obtain monthly financial reports via the Council’s Financial Management System, Agresso, advising them of current spend against the profiled budget with variances shown. Officers are responsible for providing an outturn forecast for the project and reasons for any variance.

* 1. Performance of the Council’s Capital Programme is reported to the City Executive Board (CEB) via the Quarterly Integrated Report. Part of the new Capital Gateway Process is that there will be additional, more detailed, information provided in the Integrated Reports to CEB. The Board Member for Finance and Corporate Assets will also receive a detailed update on scheme progress.
	2. Development Board also review the Capital Programme in detail on a monthly basis, and discuss and approve slippage and underspends of each of the current schemes. The Head of Financial Service has authority to slip projects into the following year or pull a project forward from a proceeding year. In cases where a project is forecasting an overspend of £250k or more and cannot be funded from other scheme underspends then the overspend must be reported to Council.

**Loans to Companies and Investments**

7.4 This includes capital expenditure such as loans to Council owned companies and investments in property funds and other direct property investments that are undertaken purely for generating a financial revenue or capital return.

7.5 These schemes are included within the Council’s capital programme and as such are reported on in the same way as other capital projects.

7.6 Loans to Companies and Investments in Property Funds will require the monitoring of the operations of the borrower / Fund Manager:

* In the case of loans to companies this will take the form of quarterly and annual performance and financial monitoring reports to Shareholders. The Shareholder can comment on any issue of concerns with a recommendation for corrective action where appropriate, with the ultimate sanction of loan call in.
* With respect to investment in property funds the performance of the fund and fund manager is tracked at half yearly meetings; the ultimate sanction for any issues of concern is to call back the investment.

7.7 Where loans to companies have been financed from borrowing, there will be no charge to revenue in respect of the principal element of the loan whilst the Council is satisfied that the company business plans support repayment in line with the agreed terms. The receipt from the company of principal repayments will then be a capital receipt which will be used to reduce the capital financing requirement. Where the Council has uncertainty over the repayment of loans, a charge to revenue will be made commensurate with the level of risk.

1. **Outline of the Gateway Review Process**

8.1 Existing Projects and Capital funding bids will pass through a series of governance and assurance gateways unless they are specifically exempted from this process (see 8.3). The governance and assurance gateways are designed to ensure that the bids and a project’s progress are monitored and assessed through a robust process aligned to the Capital Strategy.

8.2 The Gateway process will require specific documentation to be completed and submitted for review and challenge at various stages. As capital funding bids are to be submitted by September of any year, and funding is approved, ready for release during the new Financial Year (beginning April), the documentation requirement will ensure that capital expenditure or capital project details and its associated business case are recorded, in a consistent manner, so that any scheme can continue with all parties understanding the proposed outcomes and costs.

8.3 Some schemes will not become ‘Gateway projects.’ Though the capital expenditure will need to be understood for aspects such as vehicle replacement or fencing maintenance, these will not be subject to the Gateway Process other than the first stage (Proposal). These aspects will be managed within Service Areas and be subject to budget monitoring.

8.4 Once a project has been approved, as well as governance and assurance gateways, monitoring reports will be required, for review by the Development Board.

8.5 Governance arrangements for a project are to be proposed to the Development Board, who will revise or ratify the arrangements and make recommendations to the Corporate Management Team (CMT). Should responsibility for the project be delegated by the Development Board, the delegated authority (typically the Operational Delivery Group) will be responsible for the completion of any governance and assurance. Monitoring reports regarding the Capital Bid and Projects will continue to be submitted for review by the Development Board irrespective of whether authority has been delegated or not.

8.6 The Stages of the process are outlined in Section 9 below and detailed in Appendix 2. The financial appraisal of capital projects, which will be summarised within the business case document, is detailed in section 11.

1. **Options Appraisals, Feasibility Studies and the Gateway Review Process**

9.0.1 The overall process is shown in diagrammatic form in Appendix 2 and the involvement of customers is shown in Appendix 3.

**9.1 Stage 1 – Ideas and Proposals**

9.1.1 The purpose of this stage is to:

* Set out what the idea is
* Provide supporting information on why this should be prioritised
* Identify resources needed to take it forward into feasibility or delivery (small projects)

9.1.2 Ideas are put forward using a Proposal template. A proposed scheme may require feasibility funding and move to the Feasibility stage or may move directly to the Design & Specification stage where feasibility funding is not required.

9.1.3 In some instances, the scheme may be rejected outright or may be added to the pipeline of ideas for future consideration or deliver

**9.2 Stage 2 – Feasibility and Initial Design**

9.2.1 This stage will require the consideration of Construction Design and Management (CDM) and collaborative working to develop the idea.

9.2.2 Feasibility outputs are described using a Business Case template. Supporting feasibility reports and documentation should be submitted along with the Business Case.

**9.3 Stage 3 – Planning, Final Design & Technical Specification**

9.3.1 Design and specification will develop the business case and establish the requirements and full costs to enable successful delivery of the project.

9.3.2 The full business case will enable the ‘Development Board’ to determine whether funding commitment should be recommended and contracts awarded or whether the project should be held back in favour of another project that better achieves the organisation’s key priorities. Supporting reports and documentation should be submitted along with the Business Case.

9.3.3 As part of this stage, projects are assessed against the Business Assessment Criteria, including financial analysis and assessment (see section 11), and are scored using the Budget Prioritisation Criteria (see Appendix 4) prior to being put forward for budget approval.

**9.4 Stage 4 – Delivery**

9.4.1 The project is delivered against the full business case. Periodic update reports will enable the current status, risks, and issues relating to delivery to be monitored. The aim is for all projects to be delivered on time and within budget.

**9.5 Stage 5 – Closure**

9.5.1 On completion a closure report will be produced and using this the project will be reviewed to assess what went well, what could have been done differently and what the challenges were. This will capture key learning so that lessons learned can result in changes to the process for new and existing projects.

**9.6 Smaller scale and ICT projects**

9.6.1 ICT projects will be undertaken for the following reasons:

* Infrastructure improvement
* Data security improvement
* Audit requirement
* Support service improvement (joint business case from ICT and service)

9.6.2 A full business case will be produced to determine whether the project should be recommended and contracts awarded or whether the project should be held back in favour of another project that better achieves the organisation’s key priorities.

1. **Capital Funding**

10.1 There are a number of sources of funding the Council can use to finance its Capital Programme. In the past the Council has relied heavily on capital receipts to fund its General Fund Programme but with limited property available for sale these are gradually being eroded. With continuing budgetary pressures being placed on the Council’s General Fund the ability to use direct revenue funding is reducing and consequently the Council will need to either find alternative sources, use prudential borrowing, or curtail its ambitions for capital spend.

* 1. The Council’s Capital Programme is currently funded from the following sources:
* Capital Receipts
* Prudential Borrowing
* Developers Contributions e.g. s106 receipts and Community Infrastructure Levy (CIL)
* Revenue Contributions
* External funding – Capital Grants and contributions e.g.
	+ Disabled Facilities Grant – housing adaptations within the private sector
* Housing Revenue Account Financing including the Major Repairs Reserve

10.3 **Capital Receipts**

10.3.1 The Council can recycle capital receipts generated from the disposal of assets back to fund both General Fund and HRA capital projects. As at the 31 March 2018 the Council had £7.9 million of usable capital receipts available to fund future capital spend of which £6.9 million is ringfenced to schemes that increase the supply of affordable housing.

10.3.2 The City Council owns many assets including investment properties and through the Asset Management Plan the continuation of holding such assets is reviewed and decisions are taken on whether to:

* Hold and continue to maintain and refurbish them, or
* Dispose of and generate a capital receipt for funding the Capital Programme.

Further information on Investment Properties can be found in Section 12.

10.3.3 The Council has entered into an agreement with the Department for Communities and Local Government in which the authority will recycle within a rolling 3 year period Right to Buy (RTB) receipts arising from “additional” RTB disposals into new social housing dwellings within the City. There are rules around the sum allowed per new social housing build project from funding source. However, the Council currently anticipates all receipts will be utilised on eligible schemes as and when they arise. As at the 31 March 2018 the Council had £6.9 million of these receipts.

10.4 **Prudential Borrowing**

10.4.1 Under the Prudential Framework local authorities are free to make their own judgements as to whether new borrowing is affordable and prudent, subject to a duty to follow agreed professional principles, which are contained within the Prudential Code.

10.4.2 There is approximately £100 million of Prudential Borrowing included in the Council’s MTFP over the next four years. This is to fund the costs of social housing provision, repairs to investment properties, funding loans to Council companies plus some operational capital schemes.

10.4.3 Borrowing under the Prudential Framework can be used to finance Spend to Save Schemes where the capital investment achieves either revenue savings, or facilitates cost avoidance. Such schemes include Seacourt Park and Ride, Waste Transfer Station and the purchase of homes for homeless families.

10.4.4 Prudential borrowing to fund capital projects will likely, depending on the nature of the capital investment, bring with it the need to make a charge to revenue to reflect the cost of borrowing. The basis for this charge, known as Minimum Revenue Provision (MRP) is set out within the Council’s Treasury Management Strategy. This cost, where it is to be incurred, will be included the financial appraisal as part of any project’s business case.

10.4.5 Prudential borrowing for property fund investments and the making of loans to companies does not require an MRP since the loan can ultimately be repaid to the Council. However the value of the investment is reviewed annually and should the value deteriorate then impairment would need to be charged to the revenue account.

10.5 **S106 Developer Contributions/Community Infrastructure Levy (CIL)**

10.5.1 Developer contributions and CIL are sought to mitigate the impact of developments and to overcome what would otherwise be a potential reason to refuse a planning application. Following the introduction of CIL the Council primarily seeks S106 contributions to meet the social housing targets within current planning policies.

10.5.2 The CIL charging mechanism which largely replaces s106 monies can be claimed to fund:

* Community Facilities,
* Indoor Sports Facilities,
* Public Open Space,
* Environmental Improvements,
* Public Art,
* Highway measures (inclusive of Park and Ride, Pedestrian measures, Cycle Facilities etc.),
* Education,
* Libraries,
* Waste Recycling,
* Youth Services,
* Museum Resource Centre and
* Day Care Provision for Adults.

10.5.3 In order for CIL to work properly strong partnership ties with the Council’s public sector colleagues at Oxfordshire County Council, Oxford University, Oxford Brookes University, the Clinical Commissioning Group and neighbouring District and Borough Councils. Community organisations may need to be established and enhanced over time.

* 1. **Revenue Contributions**

10.6.1 Revenue funding can be used to directly finance capital expenditure. The amount that is available is dependent on other revenue income and expenditure and is driven by the Medium Term Financial Plan. Revenue Reserves can also be used to supplement the in-year funding. The levels of revenue funding available overall are subject to the judgement of the Head of Financial Services (the section 151 officer) who will assess the necessary levels of general balances and earmarked reserves.

* 1. **External funding**

10.7.1 External funding can be sought to support capital schemes and indeed this is to be encouraged since it increases the level of resources available to the Council. However prior to submitting bids for grant funding, an assessment of the proposed scheme must be undertaken including all revenue implications and conditions of the funding. The Development Board and the Head of Financial Services must agree to the capital project and the submission of a funding bid prior to entering into any commitment.

* 1. **Housing Revenue Account Specific Funding**

10.6.1 Capital commitments can be funded from surpluses within the Council’s Housing Revenue Account (HRA). The production of a 30 year HRA Business Plan, which is periodically reviewed, enables the funding needs of the Council’s housing stock to be accommodated. The amount of surplus is influenced by rents which, for four years from 1/4/2016, have been limited by Government to a year on year decrease of 1%. This in turn limits the amount of funding available to finance capital expenditure

* + 1. The HRA can utilise prudential borrowing. The HRA had a debt cap from 2012 until recently but this cap has now been abolished by Central Government.
		2. The HRA is charged with depreciation which, unlike the General Fund, is not reversed out and so is a real charge to the account. This amount is then available through the Major Repairs Reserve for financing new capital expenditure.

10.6.4 The resulting HRA Capital Programme provides for renovation and improvement of existing housing stock, tower block refurbishment and limited estate regeneration. There is limited scope for new housing construction.

1. **Financial Assessment of Business Cases**

11.1 **General**

11.1.1 Where proposals are all intrinsically part of the same project, these can be combined into one business case. Where they are distinct i.e. benefits will accrue if one part is undertaken but not the other, then separate modelling should be undertaken to give the option of taking one part without the other. Where there are potential variations within aspects of the project an options appraisal should be undertaken.

11.1.2 For grant funded projects, separate analysis should be undertaken to ensure that any benefits outweigh any costs incurred in addition to that funded directly by grant. Grant projects are not risk free and care should be taken about the risks fall and the potential impact of those risks on the Council or the City. **Projects should be approved prior to applying for grant funding**.

11.1.3 The purpose of the financial appraisal element of a business case is to:

* identify the financial implications for the project,
* allow comparison of project costs against the forecast benefits,
* ensure the project is affordable; ensure every cost associated with the project is considered,
* assess the financial impact of risks associated with the project
* understand the project sensitivities and the potential impact of these
* assess value for money, and
* predict cash flow.

11.2 **Financial Analysis**

11.2.1 Financial analysis must be undertaken with support from the relevant service accountant. The Financial Analysis must include:

* All marginal Capital and Revenue requirements
* Impact on the Balance Sheet
* The impact on the Revenue Account
* The impact on cashflows
* Overall affordability and funding

11.2.2 Costs which will no longer be incurred due to the project should be included as a benefit and likewise income which will no longer be received should be included as a cost.

11.2.3 The Financial Analysis must be undertaken on the basis of a full financial cost benefit analysis with all key assumptions identified, aiming for as much accuracy as possible. Costs and benefits should exclude VAT where this is recoverable but should include non-recoverable tax (such as national insurance and corporation tax). Financial analysis must be iterative because as the business case is developed, earlier work must be revisited to verify the continued applicability and valuation of costs and benefits.

11.2.4 Capital Funding for capital projects must be assumed to be through borrowing unless there is specific funding for the project which only becomes available to the Council through undertaking the project i.e. the construction of a new building which directly frees up another asset for sale in which case the capital receipt from that potential sale can be used as financing or part-financing. Where it is proposed to use capital funding other than borrowing for financial analysis purposes, this must be explicitly agreed by a Finance Manager (the Financial Accounting Manager or the Management Accounting Manager). Where it has been agree to use other funding sources in the financial analysis, care must be taken over timings and to ensure costs of bridge funding are included in the analysis.

11.2.5 The rate of interest to be used for borrowing will be based on PWLB rate projections indicated by the life of the asset and the expected timing of the funding requirement. Rates to be used will be set for each budget round by the Financial Accounting team.

11.2.6 The period of time each case is assessed over depends on the life of the asset / project. As a guide:

* For capital based projects the assessment should be over the life of the asset and should include all costs and benefits for the whole of that life;
* For revenue based projects the assessment should be over a 5 year period.

11.2.7 All costs and benefits must be clearly broken down so that it is clear what is included and so that the behaviours of the individual elements can be properly assessed and scrutinised. Costs and benefits with different behaviours and / or dependencies should therefore be separately identified. This analysis should be undertaken from both a cash and a revenue account perspective. Detailed workings should be available in excel format and all assumptions must be identified.

11.2.8 The overall impact on both the income and expenditure account and the impact on the balance sheet should be identified based on the analysis.

11.2.9 The following indicators must be provided for the financial cost benefit analysis:

* Net Present Value (NPV)
* Payback period (years)
* Benefit/Cost Ratio
* Internal Rate of Return (IRR)

The NPV, payback period and Benefit / Cost Ratio calculations must use a discount rate of 3.5% (as per the Treasury Green Book which is the discount rate the Council uses as a standard). The indicators must be calculated using both a cash and a revenue basis. The payback period should be provided on a discounted and a non-discounted basis.

(NB there will be other non-financial costs and benefits and these should also be identified in the business case but not as part of the financial analysis element.)

11.3 **Risk Assessment**

A risk assessment should be undertaken using the Council’s standard methodology. The assessment summarises the significant risks specifically related to the project and should explain clearly what the causes, consequences, controls and mitigations are and how the risks are managed. There are other high level risks inherent in capital programmes and these are covered in Section 14.

11.4 **Sensitivity Analysis**

11.4.1 Sensitivity analysis should be undertaken based on the risks of the project and the key assumptions adopted in the financial analysis. Sensitivity analysis concerns project risk and looks at alternative futures by measuring the impact on project outcomes or assumptions of changing values in which there is uncertainty.

11.4.2 The actual sensitivities used may vary from project to project but some basic sensitivities should include:

* Costs more than expected by 5%
* Expected savings / income less than expected by 5%
* Costs more than expected by 5% AND expected savings / income less than expected by 5%

The NPV and other indicators of each of these scenarios should be shown against the baseline case.

Also:

* How much would cost increase / savings need to reduce by to make the project unviable

11.5 **Business Case Financial Assessment**

11.5.1 The key assessment criterion is the NPV measure. IRR can be a useful guide but also can be unreliable when comparing projects with different cash flows.

11.5.2 The Payback period is useful but normally doesn’t take account of the discount factor, hence the need for inclusion of a separate discounted payback period.

11.5.3 The sensitivity analysis gives an indication of how the project will fare given variations, however judgment will have to be applied on the probability of those variations.

11.5.4 Undertaking analysis of the cashflows and revenue impact allows the impact on both the profit and the liquidity of the organisation. It may be that there will be a limit placed on the amount of projects undertaken from a strategic perspective based on the cashflow and revenue impact and associated risks as well as other non-financial factors (such as capacity).

11.6 **Standard Models**

Standard base models will be developed and revised over time, however there can never be a one size fits all approach since all projects are different and the assumptions and sensitivities will vary from project to project, however some assumptions will be consistent to enable comparison between projects. These standard assumptions will be developed and refined over time by the Financial Accounting Team within Financial Services and in any case will be reviewed for each budget round. The standard assumptions will include what general inflation figures should be used for different types of expenditure and income; variations from this can be agreed, however justification for the variation would be needed.

11.7 **Inclusion of Financial Information in a Business Case Document**

Financial analysis of a project is undertaken using excel modelling techniques. It is not appropriate to include this in detail in the Business Case for a project. Instead the key aspects of the financial analysis should be summarised, identifying the key factors such as:

* Revenue impact
* Cashflow impact
* Summary of indicators
* Sensitivity impacts
1. **Property Investments**

12.1 The Council has a substantial portfolio of properties that are held for revenue or capital returns and not for service delivery. The gross book value of these properties as at 1st April 2018 was £124.9 million. Rent due to be received in 2018/19 is £9.3 million which is 7.45% of the book value. The risk of voids has been assessed by the property team on an individual property basis which gives a total percentage risk of future void properties of 19.3% which would amount to £1.8 million. The highest impact is from the retail and restaurant sector. A high level summary is shown in Appendix 5. Future expenditure of £9.5 million over 2019/20 to 2020/21 is anticipated to refurbish investment properties.

12.2 In recent years the Council has looked to purchase property where returns are greater than the capital cost of the original investment. Capital spend has focused on:

* Indirect property investments through the fund managers Lothbury and CCLA - £10 million
* Purchase of properties for homeless families via investment fund managers Resonance, managed by St Mungos Broadway - £10 million, with £5 million match funded by Big Society Capital
* Investment and development of its existing commercial property portfolio in excess of £10million

12.3 Property Fund Investments are Treasury investments and as such are covered by the Treasury Management Strategy.

12.3 In the main capital spend is financed from prudential borrowing with borrowing costs falling on the revenue account. Prudential borrowing will generally attract a cost of capital of around 6% inclusive of the Minimum Revenue Provision (MRP). The MRP Policy is contained in the Treasury Management Strategy.

1. **Loans to Companies**

13.1 In response to reducing resources the Council has looked to new delivery models to maintain service provision and continue its significant capital investment in the City which levers in other partners and innovative financing. These new delivery models include:

13.2 **Barton LLP**

13.2.1 In 2011 the City Council entered into a partnership with the property developer Grosvenor to undertake the development of a 94 acre residential led scheme to the North East of Oxford, Barton Park.

13.2.2 Planning permission has been secured for 885 homes (354 affordable) alongside a primary school, food store, community hub and park.

13.2.3 The authority has contracted to purchase the 354 affordable dwellings which it will transfer to its Housing Company.

13.3 **Oxford Housing Company Ltd**

13.3.1 The City Council approved the establishment of a group of wholly owned housing companies in March 2016 and Oxford City Housing Limited (OCHL) (The Holding Company), Oxford City Housing (Investment) Limited (OCHIL) and Oxford City Housing (Development) Limited (OCHDL) were incorporated in 2016.

13.3.2 The Companies’ business plan includes the purchase of the 354 Barton Park properties. There is the potential to expand this programme further to bring forward new sites, subject to additional funding capacity and project viability.

13.4 **Oxpens West End Development Company Limited (OxWED)**

13.4.1 In January 2016 the Council entered into a joint venture with Nuffield College forming OXWED. The company acquired land from London and Continental Railways and following a period of master-planning will procure a development partner, complete land assembly, and bring forward a scheme of comprehensive development comprising a new mixed use neighbourhood with business space and affordable and market homes.

13.4.2 The Council has also transferred its own related land holdings into the company at market value.

13.5 **Oxford Direct Services**

13.5.1 In 2017 the Council formed two wholly owned companies:

* Oxford Direct Services Limited, a Teckal company largely providing services back to the Council and
* Oxford Direct Service Trading Limited, a Trading Company which initially is limited to commercial waste collection but in future will expand to include all external trading activity

13.5.2 The two companies became operational on 1st April 2018.

13.5.3 The Council will remain the owner of all assets that the companies will utilise to deliver their services, including vehicles and depots. These assets will be leased to the company at commercial rates over the life of the assets.

13.6 **Loans to the Companies**

13.6.1 As at 1st April 2018 the Council had given the following loans to the companies:

* £1.05 million to OCHIL for the purchase of 7 properties from the Housing Revenue Account
* £6.50 million to OxWED for the purchase of land from London and Continental Railways
* £0.10 million to OxWED for working capital

13.6.2 The Council is due a payment for some land at Barton that it has made available to Barton LLP. This is valued at £1.17 million as at 1st April 2018 and increases in value at a rate of 5% per annum.

13.6.3 Further loans have been granted during 2018/19:

* £1.23 million to OCHIL for the purchase of Barton properties
* £4.16 million to OxWED for the purchase of land from the Council

13.6.4 There are plans for further loans to the Housing Company to the value of £48 million over financial years 2019/20 to 2023/24.

13.6.5 The Council either holds the land and property relating to the capital loans as collateral or has the ability to place a charge on the property. The Council ensures that due diligence is undertaken in all aspects of these new service delivery models and any commercial activities. The business plans of the Companies are monitored and if there is uncertainty over the repayment of these loans, the Council will make a charge for impairment to its revenue account. Currently the Council does not consider that there is any significant risk of non payment of these loans.

13.6.6 Any loan for capital purposes to a company in which the Council has an interest is categorised as capital expenditure by the Council. This means that the Council can take out external borrowing to fund the loans as necessary. The Council could fund such loans from many sources; however, the majority will be funded from internal and external borrowing. The Council will not make any MRP provision in respect of loans to a Company in which it has an interest on the basis that the loan will be repaid in full on the agreed terms. The Council will undertake these loans under powers other than its Treasury Management investment powers.

13.6.7 Interest rates charged on the loans will be set with reference to:

* The level of collateral;
* An assessment of the credit worthiness of the company; and
* State Aid rules

13.6.8 Loan agreements will be put in place for any loans to Companies in which it has an interest. The agreements will detail:

* The general terms under which the loan is advanced;
* Loan repayment requirements;
* What security there is on the loan with reference to collateral; and
* Any loan covenants that must be adhered to.
1. **Risk Management**

14.1 Risk is the threat that an event or action will adversely affect the Council’s ability to achieve its desired outcomes and to execute its strategies successfully.

14.2 Risk management is the process of identifying risks, evaluating their potential consequences and determining the most effective methods of managing them and/or responding to them. It is both a means of minimising the costs and disruption to the organisation caused by undesired events and of ensuring that staff understand and appreciate the element of risk in all their activities.

14.3 The aim is to reduce the frequency of adverse risk events occurring (where possible), minimise the severity of their consequences if they do occur, or to consider whether risk can be transferred to other parties. The corporate risk register sets out the key risks to the successful delivery of the Council’s corporate aims and priorities and outlines the key controls and actions to mitigate and reduce risks, or maximise opportunities.

14.4 To manage risk effectively, the risks associated with each capital project need to be systematically identified, analysed, influenced and monitored.

14.5 It is important to identify the appetite for risk by each scheme and for the capital programme as a whole, especially when investing in capital assets held primarily for financial returns. Under the CIPFA Prudential Code these are defined as investments and so the key principle applies of control of risk and optimising returns consistent with the level of risk.

14.6 The Council accepts there will be a certain amount of risk inherent in delivering the desired outcomes of the Oxford2050 Vision. The Council seeks to keep the risk of capital projects to a low level whilst making the most of opportunities for improvement. Where greater risks are identified as necessary to achieve desired outcomes, the Council seeks to mitigate or manage those risks to a tolerable level. All key risks identified as part of the capital planning process are considered for inclusion in the corporate risk register.

14.7 In producing its capital plans, the Council will ensure that its approach to commercial activities is proportional to its overall resources so that undue risk is not placed on the Council’s future financial position.

14.8 The Following risks should be included in the Project Risk Assessment:

* Credit Risk

This is the risk that the organisation with which the Council has invested capital monies becomes insolvent and cannot pay the investment returns or complete the agreed contract. Accordingly, the Council will need to ensure that robust due diligence procedures cover all external capital investment. Where possible contingency plans will be identified at the outset and enacted when appropriate.

* Liquidity Risk

This is the risk that the timing of any cash inflows from a project will be delayed, for example if other organisations do not make their contributions when agreed. This also includes the risk that the cash inflows will be less than expected.

* Legal and Regulatory Risk

This is the risk that changes in laws or regulation make a capital project more expensive or time consuming to complete, make it no longer cost effective or make it illegal or not advisable to complete. Before entering into capital expenditure or making capital investments, the Council must understand the powers under which the investment is made. Forthcoming changes to relevant laws and regulations must be kept under review and factored into any capital bidding and programme monitoring processes.

* Interest Rate Risk

Interest rate risk must be considered at a project level where there are potential project level impacts, for instance through contractual conditions or through the effect on expected returns from the project.

* Inflation Risk

Inflation risk must be considered at a project level where there are potential project level impacts, for instance through contractual conditions or through the effect on expected returns from the project.

* Fraud, Error and Corruption

This is the risk that financial losses will occur due to errors or fraudulent or corrupt activities. Officers involved in any of the processes around capital expenditure or funding are required to follow the Council’s policies and procedures.

14.9 The Following risks are considered at a Corporate level as part of the overall capital and revenue budgeting process:

* Interest Rate Risk

This is the risk that interest rates will move in a way that has an adverse effect on the value of capital expenditure or the expected financial returns from a project. Interest rates will be reviewed as part of the on-going monitoring arrangements to identify such adverse effects. As far as possible exposure to this risk will be mitigated via robust contract terms and when necessary contract re-negotiations.

* Exchange Rate Risk

This is the risk that exchange rates will move in a way that has an adverse effect on the value of capital expenditure or the expected financial returns from a project. Where relevant, exchange rates will be reviewed as part of the on-going monitoring arrangements to identify such adverse effects. As far as possible exposure to this risk will be mitigated via robust contract terms and when necessary contract re-negotiations.

* Inflation Risk

This is the risk that rates of inflation will move in a way that has an adverse effect on the value of capital expenditure or the expected financial returns from a project. Rates of inflation will be reviewed as part of the on-going monitoring arrangements to identify such adverse effects. As far as possible exposure to this risk will be mitigated via robust contract terms and when necessary contract re-negotiations.

1. **Other Considerations**

Capital Schemes must comply with legislation, such as the Disability Discrimination Act, the General Data Protection Regulations (GDPR), building regulations etc.

**Appendix 1**

**Capital Scheme and Major Projects Appraisal Structure**



**Appendix 2**

**Capital Scheme and Major Projects Appraisal Process**



**Ideas and Proposals**

Ideas come from different places – team plans, members, strategies, service/action plans, people in the community, reviews and audits

The purpose of this stage is to:

* Set out what the idea is
* Provide supporting information on why this should be prioritised
* Identify resources needed to take it forward into feasibility or delivery (small projects)

Ideas are put forward using a Proposaltemplate.

A proposal document will outline the scheme in just enough detail to enable the Development Board or Operational Delivery Group (ODG) to make a recommendation to the Corporate Management Team (CMT) to make the decision to proceed.

A proposed scheme may require feasibility funding (controlled by the Development Board) – and move to the Feasibility stage – or may move directly to the Design & Specification.stage where feasibility funding is not required.

In some instances, the scheme may be rejected outright or may be added to the pipeline of ideas for future consideration or deliver

* Note: A Proposal form should be used where 'match funding' financing is required. Using this template and submitting the information to the Development Board will enable the idea and budget to be considered and approved. Where there are short deadlines for funding, rather than wait for the next Review Group or Development Board meeting, an exceptional meeting would be appropriate.
* Where a project is managed by an external party, e.g. Oxfordshire County Council, the project should be described using the Proposal template. This should incorporate the City Council's financial commitment so that the idea and budget can be considered and approved. A City Council Lead Officer should be appointed, so that the project may be tracked in terms of progress and expenditure.

**Summary**

|  |  |
| --- | --- |
| **Output:** | proposal with funding requirements for feasibility identified as well as who will be involved |
| **Support:** | PMO |
| **Approval route:** | Development Board or ODG with sign off by CMT |
| **Evaluation:** | Does the proposed project meet corporate priorities? Is it essential work? Will it generate income or lead to service improvement? Does it make a difference to local communities? |

**Feasibility & Options Appraisal and Design & Specification**

This stage is about developing the idea/proposal and identifying any issues that need to be overcome or may prevent your project progressing

**Large capital projects**

**Phase 1:** Feasibility and initial design

This stage will require the consideration of Construction Design and Management (CDM).

Collaborative working to develop the idea (cross-functional teams)

Feasibility outputs are described using a Business Case template. Supporting feasibility reports and documentation should be submitted along with the Business Case.

Feasibility work undertaken will enable the ‘Development Board’ to understand if a project is feasible and viable and whether the project should progress into detailed design.

In order to do so may take many weeks or months and may require assistance from Oxford Direct Services or externally procured professional services.

External funding sources may be identified at this stage

An outline Business Case is to be produced at the end of this stage.

Smartsheet ‘Project Updates’ will be issued during this stage

**Summary**

|  |  |
| --- | --- |
| **Output:** | Outline Business Case |
| **Support:** | PMO |
| **Approval route:** | Development Board with sign off by CMT |
| **Evaluation:** | Is the proposed project feasible, viable and deliverable? Does the proposed project continue to meet corporate priorities? Is it still essential work? Will it still generate income or lead to service improvement? Does it still look like it will make a difference to local communities? |

**Phase 2:** Planning, final Design & Technical Specification

Design and specification will develop the business case and establish the requirements and full costs to enable successful delivery of the project.

The full business case will enable the ‘Development Board’ to determine whether funding commitment should be recommended and contracts awarded or whether the project should be held back in favour of another project that better achieves the organisation’s key priorities. Supporting reports and documentation should be submitted along with the Business Case.

A full Business Case is to be produced

Smartsheet ‘Project Updates’ will be issued during this stage

**Funding:** The Council has a defined process for agreeing the budget for the next financial year.

**Summary**

|  |  |
| --- | --- |
| **Output:** | Full Business Case |
| **Support:** | PMO |
| **Approval route:** | Development Board with sign off by CMT |
| **Evaluation:** | Is the proposed project still viable and deliverable? Does the proposed project continue to meet corporate priorities? Is it still essential work? Will it still generate income or lead to service improvement? Does it still look like it will make a difference to local communities? |

**Smaller scale and ICT projects**

For ICT projects:

* Infrastructure improvement
* Data security
* Audit requirement
* Support service improvement (joint business case from ICT and service)

Design and specification will develop the business case and establish the requirements and full costs to enable successful delivery of the project.

The full business case will enable the ‘Operational Delivery Group to determine whether funding commitment should be recommended and contracts awarded or whether the project should be held back in favour of another project that better achieves the organisation’s key priorities.

A full Business Case is to be produced

Smartsheet ‘Project Updates’ will be issued during this stage

**Summary**

|  |  |
| --- | --- |
| **Output:** | Full Business Case |
| **Support:** | PMO |
| **Approval route:** | Operational Delivery Group with sign off by CMT |
| **Evaluation:** | Is the proposed project viable and deliverable. Does the proposed project meet corporate priorities? Is it essential work? Will it generate income or lead to service improvement? Does it look like it will make a difference to local communities? |

**Delivery**

The project is being delivered against the full business case. Periodic update reports will enable the ‘Development Board’, ‘Operational Delivery Group’ and ‘Corporate Management Team’ to monitor costs, current status, risks, and issues relating to delivery.

Using a more agile approach, projects will be delivered on time and within budget.

Smartsheet ‘Project Updates’ will be issued during this stage

**Closure**

On completion, the project will be reviewed to assess what went well, what we could have done differently, what were the challenges and to capture key learning.

Lessons learned may result in changes to the process for new and existing projects.

A Closure report is to be produced.

Supporting reports and documentation should be submitted along with the Closure Report.

**Summary**

|  |  |
| --- | --- |
| **Output:** | Closure Report |
| **Support:** | PMO |
| **Approval route:** | Development  Board or Operational Delivery Group with sign off by CMT |
| **Evaluation:** | What lessons have we learned and what should we now put in place? |

All other activity, where capital funding is required, should be described using a Project Brief template to enable information to be captured in a consistent manner. Capital ‘Gateway projects’ will be required to complete, as a minimum, three documents (over the course of the project) that will apply at the various stages from concept through to completion. Where external procurement is required, a fourth document will be required.

**Appendix 3**

**Customer Involvement in Capital Schemes and Major Projects**



**Appendix 4**



**Appendix 5**

**Investment Properties**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Nature of asset** | **Gross Book Value** | **2018/19 rent** | **Rent as % of Capital Value** | **Headline Risk of Void (%)** | **2018/19 rent at risk** | **% of Total annual rent at risk** |
|  | **£** | **£** | **%** | **%** | **£** | **%** |
|   |   |   |   |   |   |   |
| Cultural (hall / cinema / theatre) | 3,762,500 | 314,250 | 8.35% | 30.42% | 95,600 | 1.03% |
| Farm /Agricultural & Grazing Land | 1,993,500 | 16,163 | 0.81% | 4.15% | 670 | 0.01% |
| Hotels & Hostels | 7,727,651 | 578,650 | 7.49% | 7.38% | 42,725 | 0.46% |
| Housing Estate Shops | 5,375,189 | 677,810 | 12.61% | 20.32% | 137,749 | 1.48% |
| Land | 10,088,005 | 288,596 | 2.86% | 4.09% | 11,806 | 0.13% |
| Market Stalls | 8,805,467 | 1,375,335 | 15.62% | 19.69% | 270,776 | 2.91% |
| Offices | 16,418,147 | 1,358,876 | 8.28% | 9.63% | 130,879 | 1.41% |
| Public House | 2,320,000 | 157,875 | 6.80% | 9.95% | 15,714 | 0.17% |
| Residential Properties | 4,269,491 | 164,120 | 3.84% | 30.19% | 49,555 | 0.53% |
| Restaurants | 21,039,183 | 1,537,350 | 7.31% | 19.57% | 300,865 | 3.24% |
| Retail Units | 41,549,732 | 2,715,155 | 6.53% | 24.69% | 670,360 | 7.21% |
| Warehouse / Workshop | 1,554,553 | 116,000 | 7.46% | 56.29% | 65,300 | 0.70% |
|   |   |   |   |   |   |   |
| Total | 124,903,419 | 9,300,179 | 7.45% | 19.27% | 1,791,998 | 19.27% |