



United Kingdom
Debt Management
Office

Commissioners for the Reduction of the National Debt

National Lottery Distribution Fund Investment Account

Report and Accounts for the year ended 31 March 2025

Presented to Parliament pursuant to Section 33 of the National Lottery etc. Act 1993

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Performance Report

Overview

The purpose of the overview is to provide sufficient information to understand the National Lottery Distribution Fund Investment Account (NLDFIA), its purpose, the key risks to the achievement of its objectives and how it has performed during the year.

These accounts have been prepared by the Commissioners for the Reduction of the National Debt (CRND) under a direction issued by HM Treasury in accordance with section 33(2) of the National Lottery etc. Act 1993 (the Act).

Purpose and principal activities of the National Lottery Distribution Fund Investment Account

The National Lottery Distribution Fund (NLDF) was established by section 21(1) of the Act. The NLDF is maintained under the control and management of the Secretary of State for Culture, Media & Sport. The purpose of the NLDF is to receive monies generated by the National Lottery for good causes, to allocate these to Distributing Bodies, to invest the funds until such time as they are drawn down by the bodies for payment to approved grant applicants, and to meet its own expenses.

By virtue of section 32(1) of the Act, any money not immediately required for making payments can be transferred to CRND for investment. These monies and the subsequent investments are held in the NLDFIA. HM Treasury has directed that CRND's investments in respect of the NLDFIA shall be confined to those securities specified in paragraphs 1, 2, 3, 5, 5A, 5B, 9 and 9A of Part II of Schedule 1 to the Trustee Investments Act 1961.

A share of the Lottery proceeds received into the NLDF is allocated to the Distributing Bodies as set out in sections 22 and 23 of the Act (as amended). From 1 April 2012, distribution of the investment income has been on the same basis as lottery proceeds, with expenditure to be split as follows, 20.0% on arts, 20.0% on sport, 20.0% on national heritage, and 40.0% on charities, health, education or the environment.

The resources used to deliver CRND's objectives are accounted for within the United Kingdom Debt Management Office's (DMO) agency vote and reported in the DMO Report and Accounts 2024-2025. The CRND's cost of managing the NLDFIA is recharged to the Department for Culture, Media & Sport; in 2024-2025, this was £74,000 (2023-2024 £69,000).

Commissioners for the Reduction of the National Debt

CRND's main function is the investment and management of major government funds. The investment powers differ from fund to fund.

The Secretary and Comptroller General and Assistant Comptroller, who are appointed by and act on behalf of the Commissioners, make the day-to-day decisions. There is no legislation that determines the specific responsibilities of the Secretary and Comptroller General and the Assistant Comptroller. However, in practice the role of the Secretary and Comptroller General is considered analogous to acting as the Accounting Officer for CRND. Therefore, the Secretary and Comptroller General takes responsibility for preparing and signing the accounts on behalf of the Commissioners.

The arrangements made between CRND and the Department for Culture, Media & Sport in respect of the investment service provided by CRND are set out in a Memorandum of Understanding, which describes how CRND intend to achieve the agreed investment objectives.

Performance summary

CRND's strategy of investing in the Debt Management Account was maintained throughout 2024-2025. This strategy enabled the NLDFIA to earn a rate of interest very closely correlated with prevailing short-term sterling interest rates, whilst protecting its capital position and access to liquidity at all times.

Performance analysis

During the year, the NLDFIA generated total comprehensive income of £86.2 million (2023-2024: £84.0 million). This increase was due to a rise in the average balance available for investment by the NLDFIA in the Debt Management Account. The interest rate offered by the Debt Management Account corresponded to the official Bank Rate.

As at 31 March 2025, the total value of investments held by the NLDFIA was £1,802 million (31 March 2024: £1,737 million). This increase was due to interest earned on the investments in the NLDFIA during the year.

Jo Whelan

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt

11 June 2025

Accountability Report

The accountability report comprises two sections: a **corporate governance report** and a **parliamentary accountability and audit report**. The **corporate governance report** includes the following information: the responsibilities of the Secretary and Comptroller General; the composition, responsibilities and actions of the Advisory Board and the Audit and Risk Committee and how they have supported the Secretary and Comptroller General and enabled the objectives of the NLDFA; the key risks faced by the NLDFA and how it seeks to manage them. The **parliamentary accountability and audit report** includes a formal opinion by the NLDFA's external auditor to certify that the financial statements give a true and fair view of the state of the NLDFA's affairs for the year and that they have been prepared in accordance with all relevant rules.

These two sections contribute to the NLDFA's accountability to Parliament and comply with best practice in relation to corporate governance norms and codes. In particular, the **corporate governance report** seeks to do so by describing the key mechanisms the NLDFA employs to ensure it maintains high standards of conduct and performance. This includes the statement of Secretary and Comptroller General's responsibilities which describes her accountability to Parliament for the NLDFA's use of resources and compliance with rules set by HM Treasury to ensure best practice in financial management. The governance statement reflects the applicable principles of the Corporate Governance Code for Central Government Departments. The **parliamentary accountability and audit report** confirms that expenditure and income of the NLDFA have been applied to the purposes intended by Parliament and confirms that information in the parliamentary accountability disclosures has been audited and approved by external auditors.

Corporate governance report

Directors' report

Operationally, the CRND is part of the DMO and its staff are employees of the DMO. The CRND therefore has no staff of its own. The structure of the CRND is described on page 4.

Directors' conflicts of interest

In 2024-2025, no material conflicts of interest were declared by DMO Advisory Board members.

Reporting of personal data related incidents

The NLDFA had no protected personal data related incidents during 2024-2025.

Jo Whelan

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt

11 June 2025

Statement of Secretary and Comptroller General's responsibilities

Section 33(2) of the National Lottery etc. Act 1993 requires the Commissioners to prepare for each financial year a statement of accounts in the form and on the basis set out in the accounts direction. The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of the NLDFIA, its income and expenditure, statement of financial position and cash flows for the financial year.

The Commissioners have appointed the Secretary and Comptroller General to discharge their statutory responsibilities, a role that is analogous to acting as an Accounting Officer. Therefore, the Secretary and Comptroller General has responsibility for preparing the annual accounts.

In preparing the accounts, the Secretary and Comptroller General is required to observe the applicable accounting standards and be consistent with the relevant requirements of the Government Financial Reporting Manual (FReM), and in particular to:

- observe the accounts direction issued by HM Treasury, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- make judgements and estimates on a reasonable basis;
- state whether applicable accounting standards have been followed, and disclose and explain any material departures in the accounts;
- prepare the accounts on a going-concern basis; and
- confirm that the annual report and accounts as a whole are fair, balanced and understandable, and take personal responsibility for the annual report and accounts and the judgements required for determining they are fair, balanced and understandable.

As the role of the Secretary and Comptroller General is analogous to acting as an Accounting Officer, it is considered that the responsibilities of an Accounting Officer, as set out in Managing Public Money published by HM Treasury, apply to the Secretary and Comptroller General. These include responsibility for the propriety and regularity of the public finances for which the Secretary and Comptroller General is answerable, for keeping proper records, and for safeguarding the NLDFIA's assets.

Disclosure to auditors

Under section 33(3) of the Act, the Comptroller and Auditor General examines, certifies and reports on the accounts and lays copies of them with his report before each House of Parliament.

The Comptroller and Auditor General charges no audit fee for undertaking this statutory audit.

As the Secretary and Comptroller General, I have taken all the steps that I ought to have taken to make myself aware of any relevant audit information and to establish that the NLDFIA's auditors are aware of that information. So far as I am aware, there is no relevant audit information of which the auditors are unaware.

Governance statement

Scope of responsibility

The Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt (CRND) is responsible for ensuring the operation of a sound system of internal control that supports the achievement of CRND's targets, policies and objectives in managing client investment portfolios whilst safeguarding the public funds for which they are accountable, in accordance with the responsibilities assigned to the Secretary and Comptroller General.

CRND is a separate business entity managed within the control framework of the DMO. While the Secretary and Comptroller General is responsible for CRND's system of internal control, the Accounting Officer of the DMO is responsible for the wider control framework within which CRND is managed. In discharging the control responsibilities, the Secretary and Comptroller General takes assurance on the continued sound maintenance of the wider control framework from the governance statement for the DMO, although it is understood that only reasonable and not absolute assurance can be given that risks have been controlled.

It is also the responsibility of the Secretary and Comptroller General to ensure that all CRND fund management activities are conducted with due regard to value for money and operated in line with client instructions. The Secretary and Comptroller General has put arrangements in place to ensure that there is a proper evaluation of the balance of cost and risk in our operations.

CRND is committed to the highest standards of corporate governance and is subject to the guidance set out in the Corporate Governance Code for central government departments (the Code) and the principles laid down in that Code:

- Parliamentary accountability;
- The role of the Board;
- Board composition;
- Board effectiveness; and
- Risk management.

CRND does not conduct any part of its business with or through arm's length bodies (ALBs) and therefore CRND has not applied principle six which covers departmental governance arrangements with ALBs.

On 28 September 2023, it was announced that Sir Robert Stheeman, the Chief Executive of the DMO, would be retiring on 30 June 2024 and an open recruitment process for a successor commenced in late December 2023. On 16 April 2024, Jessica Pulay was announced as the new Chief Executive, and commenced this role on 1 July 2024.

Advisory Board

The Secretary and Comptroller General was supported during 2024-2025 by the Advisory Board (the Board) which, in addition to the Secretary and Comptroller General, comprised:

- Dame Sue Owen

Non-executive Chair- Dame Sue was a civil servant for 30 years, including 14 years at HM Treasury. Amongst other things, Dame Sue worked on fiscal policy and debt management policy at HM Treasury. Dame Sue has previously held senior roles at the Foreign and Commonwealth Office, Department for International Development and Department for Work and Pensions. Most recently Dame Sue served as the Permanent Secretary at the Department for Digital, Culture Media and Sport, from 2013 to 2019. Dame Sue has other current roles, including non-executive director at Pantheon International plc and Serco plc.

- Jessica Pulay

DMO Chief Executive and Accounting Officer (from 1 July 2024)

Co-Head of Policy and Markets (until 30 June 2024)

- Sir Robert Stheeman (until 30 June 2024)

DMO Chief Executive and Accounting Officer

- Jim Juffs

Chief Operating Officer

- Ruth Curtice (until 20 December 2024)

Non-executive HM Treasury representative

- Stephen Farrington (from 24 February 2025)

Non-executive HM Treasury representative

- Paul Fisher

Non-executive Director - During a 26-year career at the Bank of England, Paul Fisher served as a member of the Monetary Policy Committee from 2009 to 2014, the interim Financial Policy Committee from 2011 to 2013 and the PRA Board from 2015 to 2016. Paul has a number of current roles including Chair of the London Bullion Market Association.

- Martin Egan

Non-executive Director - Martin Egan has 37 years of experience in financial markets. Most of Martin's career was spent at BNP Paribas in various roles including Managing Director Global Co-Head Primary and Secondary Credit, Vice Chairman of the Global Markets Client Board, and Chair of BNPP UK Ltd. Martin was also Chair of the Diversity and Inclusion Network at BNPP UK. Earlier in his career Martin held roles at JP Morgan Ltd., UBS Investment Bank and Credit Suisse First Boston. Martin was also the Chair of the Board of the International Capital Market Association from May 2017 to May 2018, and a member of the Board for another five years before that.

Non-executive directors are appointed by the Non-executive Chair, in consultation with the DMO Accounting Officer, following a formal process and have fixed terms defined in their contract of service. All non-executive board members including the Non-executive Chair will receive an induction on joining and have access to additional information and training where it is considered necessary for the effective discharge of their duties.

One of the roles of the Board is to advise the Secretary and Comptroller General on any key decisions affecting CRND.

An executive sub-committee of the Board generally meets weekly and supports the Secretary and Comptroller General on operational decisions.

The Terms of Reference for the Advisory Board were set out on its formation in June 2022. The Board's effectiveness was reviewed in November 2024, after the new Accounting Officer was established in the role. Overall, the review found that the Advisory Board had been very effective in fulfilling its responsibilities.

2024-2025 Advisory Board activities

Board meetings were held throughout 2024-2025 and covered regular agenda items, including risk management, staffing and progress against the operational business plan.

Board, as well as Audit and Risk Committee, attendance is outlined in the table below:

	Possible	Actual		
Dame Sue Owen	6	6		
Jessica Pulay	6	6		
Sir Robert Stheeman	1	1		
Jo Whelan	6	6		
Jim Juffs	6	6		
Paul Canty	2	2		
Ruth Curtice	4	4		
Stephen Farrington	1	1		
Paul Fisher	6	6		
Martin Egan	6	6		
Rodney Norman	n/a	n/a		
			Audit and Risk Committee	
			Possible	Actual
			5	5
			5	5
			5	5

Audit and Risk Committee

The Secretary and Comptroller General was supported during 2024-2025 by the Audit and Risk Committee on matters relating to risk, internal control and governance. The Audit and Risk Committee covers the activities of the DMO, Debt Management Account, PWLB lending facility and CRND. The members of the Audit and Risk Committee during 2024-2025 were:

- Paul Fisher (Chair)
- Martin Egan
- Rodney Norman

Audit and Risk Committee member - Rodney was Finance Director of NS&I until 2018. Prior to that Rodney was the Treasury Accountant at HM Treasury. This was preceded by a career in the City where he qualified as a Chartered Accountant with PWC and was Finance Director of the Banking Division of Close Brothers. Rodney is currently a non-executive member of the Audit and Risk Committee of the Army. Rodney has previously been a senior advisor to the Bank of England and a non-executive director of a variety of organisations including the Pension Protection Fund, where he was also a member of its Risk and Audit Committee and chaired the Nominations Committee.

Audit and Risk Committee meetings are typically attended by the DMO Accounting Officer, the Secretary and Comptroller General, the Co-Heads of Policy & Markets, the Chief Operating Officer, the Head of Internal Audit, the Head of Finance, the Head of Risk and the National Audit Office.

One of the Audit and Risk Committee's objectives is to give advice to the Secretary and Comptroller General on:

- The overall processes for risk, control and governance and the governance statement;
- Management assurances and appropriate actions to follow from internal and external audit findings, risk analysis and reporting undertaken;
- The financial control framework and supporting compliance culture;
- Accounting policies and material judgements, the accounts and the annual report and management's letter of representation to the external auditors;
- Whistleblowing arrangements for confidentially raising and investigating concerns over possible improprieties in the conduct of the DMO's business;
- Processes to protect against money laundering, fraud and corruption; and
- The planned activity and results of both internal and external audits.

During the period under review the Audit and Risk Committee paid particular attention to the following areas:

- Results of cyber security reviews and tests;
- Succession planning and key dependency risks;
- Documentation of roles and responsibilities and authorisations and delegations;
- Personnel and building security risks;
- Risk management framework;

- Personal dealing policy;
- High level risks, principal risks and uncertainties;
- Procurement processes and controls;
- Finance processes;
- Business critical models;
- User access rights and permissions;
- Critical spreadsheets;
- Compliance with applicable legal & regulatory requirements;
- Governance and controls over cash management;
- Operating models for debt and cash management activities;
- Civil Service Commissioners recruitment principles;
- IT controls over patching updates;
- SWIFT attestation;
- Business Continuity response plans in event of a cyber security incident;
- Whistleblowing policy;
- Trading System upgrade project;
- Changes to Global Internal Audit Standards.

The Audit and Risk Committee covers a regular programme of agenda items, together with other current topics, and met four times during the year to consider its regular agenda. There was one additional ad-hoc meeting to discuss preparations to sign the Annual Report and Accounts 2023-2024 ahead of the departure of the DMO's former Chief Executive, Sir Robert Stheeman.

The Secretary and Comptroller General has also been informed by the following operational committees throughout the period under review:

Fund Management Review Committee

The Fund Management Review Committee monitors CRND activity relating to the performance of the government funds under management, including any reporting on compliance activities undertaken in relation to the funds.

The Fund Management Review Committee met four times in 2024-2025.

Business Delivery Committee

The Business Delivery Committee (BDC) reviews the status of the delivery of DMO's business and work plan as a collective cross-functional body, resolving emerging issues in a timely way, and agreeing priorities to ensure

the plan stays on track. The most significant initiatives monitored by the BDC during the year were the trading system upgrade, infrastructure upgrades, and the IT strategy.

The Business Delivery Committee met regularly (typically weekly) throughout 2024-2025.

Risk Committees

The Secretary and Comptroller General is informed by two risk committees covering operational risk and material change programmes. More detail on the roles, responsibilities and activities of these committees can be found in the sections below.

Risk management and internal control

The Secretary and Comptroller General is responsible for maintaining a sound system of internal control that supports the achievement of CRND's targets, policies and objectives in managing client investment portfolios whilst safeguarding the public funds for which they are accountable, in accordance with the responsibilities assigned to them in the Managing Public Money document.

CRND is managed within the wider DMO system of internal control which is based upon what the DMO Accounting Officer, with the support of the Board, considers to be appropriate, taking account of the DMO's activities, the materiality of risks inherent in those activities and the relative costs and benefits of implementing specific controls to mitigate those risks. The DMO's position differs to that of a commercial organisation in that it must always be in a position to transact the underlying business required to meet its remit. As a result, the risks associated with this activity cannot be avoided and the system of internal control can only provide reasonable assurance against failure to achieve aims and objectives.

The Risk and Control Framework

The Board has designed and put in place a formal risk management framework covering all the activities conducted and overseen by the DMO. This framework helps ensure that the DMO Accounting Officer is appropriately informed and advised of any identified risks and also allows the management of risks to be monitored. The risk management framework covers both regular operations and new business initiatives, and evolves as the range and nature of the DMO's activities change. The framework is supported by a clear 'three lines of defence' model:

First line of defence:

Day-to-day management of risk is the responsibility of management staff within business areas. The DMO considers effective risk management to be central to its operations and fosters a risk aware culture in which all members of staff, including Board members, are encouraged to understand and own the risks that are inherent in those operations. In particular, the DMO seeks to promote an environment in which staff feel comfortable to identify new risks and changes in previously identified risks, as well as weaknesses so that these may be assessed and appropriate mitigating actions put in place.

Mitigating actions typically include segregation of duties, staff training, clear lines of management delegation and reporting and robust business continuity arrangements.

Second line of defence:

Oversight of risk is provided by the Board and risk committees, whose role is to provide regular and systematic scrutiny of risk issues which lie within their remit and to support the DMO Accounting Officer in exercising their overall responsibility for risk management.

The DMO considers that the principal risks it faces arise in three broad areas: credit risk, market risk and operational risk. It has established committees to meet regularly to review the changing risk pattern for each of these areas and to set up appropriate responses. The work of these committees is described in more detail below.

Credit and Market Risk Committee

The Credit and Market Risk Committee (CMRC) meets on a regular basis, with more frequent meetings held when required, for example during times of market stress. The CMRC monitors and reviews the management of market, credit, and liquidity risk. The CMRC met six times during 2024-2025.

Operational Risk Committee

The Operational Risk Committee (ORC) meets regularly to monitor operational risks and to review significant risk issues. The ORC is responsible for reviewing risk incidents identified through the DMO's risk incident reporting process, and for considering whether planned mitigating actions are appropriate. The ORC also reviews and tracks the progress of actions identified by Internal Audit. The ORC's scope includes issues relating to information risk, IT security, business continuity, anti-fraud and key supplier risks.

The ORC has advised the DMO Accounting Officer and the Board, during the year, on significant operational risk concerns, significant risk issues and trends as well as actions to mitigate such risks. This year, the ORC focussed on business continuity, information security, cyber security, physical security and personnel security. The ORC also reviewed contingency planning scenarios. The ORC met eight times during 2024-2025.

Controls Group

The Controls Group meets periodically to review issues affecting the DMO's system of internal control and to analyse material changes to the control environment. The Controls Group recommends actions to management to implement changes where appropriate. The Controls Group consists of representatives from Finance, Risk, Compliance and Internal Audit.

The Controls Group has advised the DMO Accounting Officer, the Board and senior management on any significant risk concerns stemming from the introduction of new business activities as well as risks relating to other change management activities. The Controls Group has also advised the DMO Accounting Officer on suitable mitigating actions where appropriate.

During the year the Controls Group reviewed key project change proposals including the escalation process of incidents, trading process enhancements, IT strategy and the trading system upgrade implementation.

Risk Management Unit

The risk committees are supported by the DMO's Risk Management Unit (RMU) which ensures key risk issues arising from these committees are communicated to the DMO Accounting Officer and senior management on a regular basis, with additional ad-hoc reporting if an emerging issue requires it. The RMU also supports the formal risk reporting processes with defined outputs, including regular detailed risk reports which are reviewed by the Board and senior management.

As well as supporting the risk committee structure, the RMU provides control advice on risks. As part of the second line of defence the RMU is separate from, and independent of, the DMO's trading operations. The RMU conducts risk analysis and provides market, credit and operational risk capability for the DMO.

The identification, monitoring and mitigation of operational risk is facilitated by the RMU via quarterly consultations with heads of business units and functional teams. Significant risk issues are assessed for materiality and probability of occurrence. New risks, and risks to which exposure is increasing, are highlighted and actions are taken to ensure effective management of all risks. The DMO has Senior Risk Owners (SROs) who undertake a cross-functional moderation process to promote better prioritisation of operational risks across the organisation. The RMU maintains a central exception log to record all risk incidents raised, in order to identify control weaknesses and assign actions to improve controls. RMU continued to carry out compliance awareness training to all staff, throughout the year.

Third line of defence:

The DMO's Internal Audit function is the third line of defence and provides the Accounting Officer with independent and objective assurance on the overall effectiveness of the DMO's system of internal control. It does this through a risk based work programme which is presented to and approved by the Audit and Risk Committee at the start of each year. All audits review the processes in place and where necessary raise findings relating to control weaknesses and management actions are agreed to mitigate any risks and enhance the control structure. Progress against agreed management actions is monitored on a regular basis to ensure issues highlighted by internal audit, as well as any issues raised by the external auditors, and other identified actions to improve the control environment, are managed and progressed within agreed deadlines. The function is independent of the DMO's trading activities and operations and has a direct reporting line to the Accounting Officer as well as the chair of the Audit and Risk Committee. The work of Internal Audit includes assessing the effectiveness of both control design and control performance. With its independence and overall remit, Internal Audit provides a third line of defence against the risks that might prevent the DMO delivering its objectives.

Risk policies and procedures

The DMO's risk policies reflect the high standards and robust requirements which determine the way risks are managed and controlled. The DMO Accounting Officer, with the support of the Board, ensures that policies are regularly reviewed to reflect any changes in the DMO's operations and/or best practice. In 2024-2025, this included policies relating to health & safety, spreadsheet control, anti-fraud, personal dealing, gifts & hospitality and anti-money laundering.

Staff are asked to confirm that they have read and accepted the DMO's rules on personal dealing and the DMO's policy on the use of information systems and technology, and that they are aware of, and will continue to keep up to date with, the DMO's policies on whistleblowing, anti-fraud, anti-money laundering and information security. The DMO ensures that this exercise is undertaken on an annual basis allowing staff to maintain a good level of awareness of the DMO's policies in these areas. All members of staff have job descriptions which include reference to the specific key risks they are expected to manage.

Managers in each business function are responsible for ensuring that the operations within their area are compliant with plans, policies, procedures and legislation.

During 2024-2025 no concerns were raised by staff under the DMO's whistleblowing policy relating to CRND.

Key Developments

Geopolitical conflicts

Further to ongoing geopolitical conflicts, the DMO again continued to closely monitor actual and potential effects on activities, markets, counterparties and suppliers.

The DMO continued to work with partners across government to ensure all necessary steps were taken to maintain cyber security defences and also assurances were received from some strategic partners regarding their own arrangements, with details of the assurances put in place to mitigate against any disruption or impact. Internal assessments considered potential accounting or disclosure impacts and any effects through legal and regularity changes.

Spending Review

Risks to effective delivery of the DMO's objectives arise from the constraints associated with pressures on public sector spending. As a result, effective budgetary control continues to be a critical element of financial management of the DMO.

The DMO continues to face particular challenges due to the nature of its role. First, it faces specific additional cost increases for certain third-party services it requires in order to undertake its role in the financial markets. Second, it competes for recruitment of suitably skilled staff with private sector banks and other financial institutions which are not subject to the same remuneration constraints as the DMO. Notwithstanding these exogenous cost pressures the DMO's core objectives are non-discretionary, so it would be challenging to deprioritise certain objectives in order to reduce costs.

Risk Profile

The Secretary and Comptroller General and the DMO Board believe that the principal risks and uncertainties facing CRND are outlined in the table below together with the key actions taken to manage and mitigate them:

Principal risks and uncertainties	Mitigation and management
IT systems and infrastructure	
<p>CRND relies on a number of IT and communications systems to conduct its operations effectively and efficiently.</p>	<p>During the year the DMO has progressed additional initiatives to further strengthen the resilience and security of its IT network and infrastructure. Strategic roadmap priorities were reviewed and the DMO carried out an internal health-check. The DMO has in place structured business continuity arrangements to ensure it is able to continue market operations in the event of an internal or external incident that threatens business operations.</p> <p>Arrangements to support critical operations were in place throughout the year with a core team in the office, support teams working from the disaster recovery site and staff working from home. Assessment of business continuity needs is also a specific requirement for new projects and major business initiatives.</p>
IT and data security	
<p>The DMO could be the subject of an external attack on its IT systems and infrastructure. Through its activities the DMO gathers, disseminates and maintains sensitive information including market sensitive information and personal data about staff and market participants. The DMO seeks to ensure the highest standards of data protection and information management.</p>	<p>The DMO, including CRND, continues to work to maintain the required level of protective security covering physical, personnel and information security and is particularly aware of the growing threat posed by cyber security risk. IT and data security risks continued to be a specific area of focus in 2024-2025 and the DMO's IT team have been enhancing the detective, protective and recovery security controls.</p> <p>Risks to data and information held by the DMO are owned and managed by designated Information Asset Owners. The DMO has a Senior Information Risk Owner (SIRO) who is responsible for the information risk policy and the assessment of information risks. The SIRO is a member of the Board and provides advice to Board members on the management of information risks.</p>

The DMO has upgraded its monitoring and alerting systems throughout the infrastructure, providing improved visibility and enhancing the response to potential incidents. This year the DMO undertook internal and independent testing to ensure defences remained robust against the changing landscape of cyber-attacks.

This year the DMO observed a global IT outage that disrupted the financial markets, reinforcing the importance of contingency planning and mitigating third party supplier risk.

Reliance on third parties

A number of the operational systems and services on which CRND relies are provided or supported by third party suppliers.

To mitigate the risk of failure of a key third party supplier the DMO undertakes regular corporate risk assessments of each key supplier to assess a range of factors including its financial strength and operational capacity, including the reliance on sub-contractors. The DMO has dedicated contract owners who meet regularly with key suppliers and monitor performance against the agreed Service Level Agreements, where appropriate.

The procurement manager and the vendor management group have been working to embed consistent standards of supplier management across account managers by improving visibility of key contracts and sharing best practice. The DMO has introduced enhanced monitoring for critical suppliers (i.e. strategic partners) that focuses on risk and strategic aspects. Scrutinised areas include inherent risks, scenario analysis, assessment of supply chain risks including fourth parties, monitoring and assessing residual risks, and mitigation planning. External consultancy work assisted with the approach.

The DMO sought assurance that its key suppliers and strategic partners follow National Cyber Security Centre (NCSC) guidance on cyber security. This year, further work was undertaken to explore alternative arrangements where over-reliance on particular key suppliers has been identified.

Work has commenced to align the DMO procurement policies and procedures with the new procurement legislation and to ensure it remains up to date with the Government Functional Standard GovS 008: Commercial and Commercial Continuous Improvement Assessment Framework. The Procurement Bill received Royal Assent on 26

October 2023. It will now be referred to as the Procurement Act 2023 and came into force on 24 February 2025.

Transaction processing

CRND relies on its operational processes to successfully execute a significant number of high value transactions on a daily basis. Reliance on the accurate execution of processes exposes CRND to operational risk arising from process breakdowns and human error.

A key component of CRND's control framework is the segregation of duties to ensure independent checking and reconciliation, and to avoid concentration of key activities or related controls in individuals or small groups of staff. In particular, segregation of duties takes place between front and back office activities.

All teams, including CRND, have documented procedures for their main activities and there are clearly defined authorisation levels for committing the DMO externally.

The RMU conduct regular control and compliance testing of CRND activities, providing the executive sub-committee of the Board with assurance on the effectiveness of operational controls and compliance with relevant Financial Conduct Authority and Prudential Regulation Authority rules in the dealing and settlement areas.

The DMO also maintains a strong audit and control environment which includes a well embedded incident reporting procedure which extends to cover CRND. This promotes the early identification and resolution of risk incidents and provides visibility to the DMO Accounting Officer and Board.

The continued focus has been on enhanced compliance monitoring over transaction processing, to provide assurance over controls standards during remote working. During the year, operational support training was provided to relevant staff to increase resilience in support roles. There were also enhanced controls implemented for oversight of counterparty interactions.

This year, the DMO worked on upgrading a key trading system.

People risk

The DMO, including CRND, relies on maintaining a sufficiently skilled workforce at all levels of the organisation in order to operate effectively and

DMO recruitment activity helps ensure that individuals with the appropriate level of skill and experience are appointed at all levels within the

efficiently, ensuring delivery of its strategic objectives.

The DMO is exposed to an increased risk of operational failure if it is unable to compete for, and retain, sufficiently skilled staff over time. Competition for skilled staff is generally against employers from the private financial services sector who have historically offered higher remuneration packages that are not subject to public sector remuneration policies.

organisation. This helps mitigate the level of human error which could result in process failures.

The DMO follows the Civil Service Commission's recruitment principles and selection process to ensure vacancies are filled on merit on the basis of fair and open competition.

Challenges with recruitment and retention were again identified this year and were reviewed by the Advisory Board. These include pay, length of time to hire and staff turnover, particularly in more junior roles. The DMO is taking action to target these areas and seeing signs of greater stability in the workforce.

The DMO has a formal performance appraisal process and all staff are given clear and achievable objectives. Progress is reviewed against these regularly.

The DMO's Training and Development policy is designed to help ensure that staff have the right skills to meet its objectives. Induction training is provided to all new employees.

Staff are encouraged to engage in activities which promote development and the DMO provides regular training opportunities and support for professional studies to enhance the skills base of its employees. The DMO also provides cross-training for different roles to help improve staffing flexibility and reduce turnover pressure. Teams are encouraged to ensure cross-skilling of staff to support resilience. Succession planning activities continued to identify key person risks and mitigations, with a focus on establishing deputies to provide resilience.

Salaries are benchmarked annually to equivalent private sector pay levels in order to keep management aware of any significant disparities that are developing. The DMO has a policy to recognise those staff who have performed well in their roles through the payment of one-off non-consolidated performance related awards. Any awards are assessed annually by the DMO Performance Review Team. They are determined by individual performance and criteria associated with the DMO's performance management process, which are also aligned to the policy for public sector pay.

Risks to our people are considered by an internal security group and include safety and physical, cyber

and personnel security. This includes activity within the physical building and external factors.

Risks from our people are also considered. As well as risks resulting from under-skilled or under resourced teams, the DMO considers insider risk, both intentional and accidental. Addressing the threat of insider risk requires a multi-disciplinary approach encompassing cyber security, human resources, line management and robust risk controls.

In addition, the DMO has continued to benchmark Personnel Security to identify the level of competence and areas for development. The DMO will continue to increase its security culture, building on screening and monitoring of the workforce, insider risk assessment and management, investigation and disciplinary processes.

A Staff Council has met regularly throughout the year and enabled an open exchange of ideas and views between management and staff representatives. Staff Council was consulted to discuss the future hybrid working arrangements. This has been an effective conduit for wider communication and consultation with all staff.

On an annual basis all DMO staff are given the opportunity to take part in the Civil Service People survey. Any issues raised via this route, with suggested mitigating action if required, are considered by the Accounting Officer and the Board.

The organisation has placed greater emphasis on undertaking key person risk analysis for succession planning. This year, HR organised management development training across the organisation to support the management group.

The DMO is a disability confident employer.

Review of effectiveness

I have reviewed the effectiveness of the system of internal control and confirm that an ongoing process designed to identify, evaluate and prioritise risks to the achievement of CRND's aims and objectives has been in place throughout 2024-2025. This review included an assessment of any material risk and control issues identified and reported during the relevant period.

My review has been informed by the advice of the risk committees, the work of the internal auditors and the executive managers within the DMO, who have been delegated responsibility for the development and

maintenance of the internal control framework. Comments made by the external auditors in their management letter and other relevant reports have also informed this review.

In my role as Secretary and Comptroller General I have been advised on the implications of the result of my review, of the effectiveness of the system of internal control by the Board and the Audit and Risk Committee.

In 2024-2025, no ministerial directions were given and no material conflicts of interest have been noted by the Board or Audit Committee members in the Register of Interests.

In my opinion, CRND's system of internal control was effective throughout the financial year and remains so on the date I sign this statement.

Jo Whelan

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt

11 June 2025

Parliamentary accountability and audit report

Regularity of expenditure

The income and expenditure of the NLDFIA were applied to the purposes intended by Parliament.

The above statement has been audited.

Fees and charges

The NLDFIA received no fees or charges during the year.

The above statement has been audited.

Remote contingent liabilities

The NLDFIA did not have any remote contingent liabilities as at 31 March 2025.

The above statement has been audited.

Jo Whelan

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt

11 June 2025

The certificate and report of the Comptroller and Auditor General to the Houses of Parliament

Opinion on financial statements

I certify that I have audited the financial statements of the National Lottery Distribution Fund Investment Account for the year ended 31 March 2025 under the National Lottery etc. Act 1993.

The financial statements comprise the National Lottery Distribution Fund Investment Account's:

- Statement of Financial Position as at 31 March 2025;
- Statement of Comprehensive Income, Statement of Cash Flows and Statement of Changes in Client Funds for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted International Accounting Standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the National Lottery Distribution Fund Investment Account's affairs as at 31 March 2025 and its total comprehensive income for the year then ended; and
- have been properly prepared in accordance with the National Lottery etc. Act 1993 and HM Treasury directions issued thereunder.

Opinion on regularity

In my opinion, in all material respects, the income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

Basis for opinions

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 *Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2022)*. My responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of my certificate.

Those standards require me and my staff to comply with the Financial Reporting Council's *Revised Ethical Standard 2019*. I am independent of the National Lottery Distribution Fund Investment Account in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern

In auditing the financial statements, I have concluded that the National Lottery Distribution Fund Investment Account's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the National Lottery Distribution Fund

Investment Account's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Commissioners and the Secretary and Comptroller General with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the National Lottery Distribution Fund Investment Account is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

Other information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor's certificate and report thereon. The Commissioners and the Secretary and Comptroller General are responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

Opinion on other matters

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with HM Treasury directions made under the National Lottery etc. Act 1993; and
- the information given in the Performance and Accountability Reports for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

Matters on which I report by exception

In the light of the knowledge and understanding of the National Lottery Distribution Fund Investment Account and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Reports.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept by the National Lottery Distribution Fund Investment Account or returns adequate for my audit have not been received from branches not visited by my staff; or
- I have not received all of the information and explanations I require for my audit; or

- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Commissioners and the Secretary and Comptroller General for the financial statements

As explained more fully in the Statement of Secretary and Comptroller General's Responsibilities, the Commissioners and the Secretary and Comptroller General are responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- providing the C&AG with additional information and explanations needed for his audit;
- providing the C&AG with unrestricted access to persons within the National Lottery Distribution Fund Investment Account from whom the auditor determines it necessary to obtain audit evidence;
- ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error;
- preparing financial statements which give a true and fair view in accordance with HM Treasury issued under the National Lottery etc. Act 1993;
- preparing the annual report in accordance with HM Treasury directions issued under the National Lottery etc. Act 1993; and
- assessing the National Lottery Distribution Fund Investment Account's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Commissioners and the Secretary and Comptroller General anticipate that the services provided by the National Lottery Distribution Fund Investment Account will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the National Lottery etc. Act 1993.

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was considered capable of detecting non-compliance with laws and regulations including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

- considered the nature of the sector, control environment and operational performance including the design of the National Lottery Distribution Fund Investment Account's accounting policies;
- inquired of management, the National Lottery Distribution Fund Investment Account and those charged with governance, including obtaining and reviewing supporting documentation relating to the National Lottery Distribution Fund Investment Account's policies and procedures on:
 - identifying, evaluating and complying with laws and regulations;
 - detecting and responding to the risks of fraud; and
 - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the National Lottery Distribution Fund Investment Account's controls relating to the National Lottery Distribution Fund Investment Account's compliance with the National Lottery etc. Act 1993 and Managing Public Money;
- inquired of management, National Lottery Distribution Fund Investment Account's head of internal audit and those charged with governance whether:
 - they were aware of any instances of non-compliance with laws and regulations;
 - they had knowledge of any actual, suspected, or alleged fraud;
- discussed with the engagement team regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the National Lottery Distribution Fund Investment Account for fraud and identified the greatest potential for fraud in the following areas: the posting of unusual journals. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the National Lottery Distribution Fund Investment Account's framework of authority and other legal and regulatory frameworks in which the National Lottery Distribution Fund Investment Account operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the National Lottery Distribution Fund Investment Account. The key laws and regulations I considered in this context included the National Lottery etc. Act 1993 and Managing Public Money.

Audit response to identified risk

To respond to the identified risks resulting from the above procedures:

- I reviewed the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- I enquired of management, the Audit and Risk Committee and legal counsel concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Board and internal audit reports; and
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative

of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of my certificate.

Other auditor's responsibilities

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

Report

I have no observations to make on these financial statements.

Gareth Davies

Comptroller and Auditor General

12 June 2025

National Audit Office
157-197 Buckingham Palace Road
Victoria
London
SW1W 9SP

Accounts of the National Lottery Distribution Fund Investment Account

Statement of comprehensive income

For the year ended 31 March 2025

	2025 £000	2024 £000
Interest income	86,237	83,968
Total comprehensive income	86,237	83,968

The notes on pages 33 to 35 form part of these accounts.

Statement of financial position

As at 31 March 2025

	2025 £000	2024 £000
Assets		
Demand deposits with the Debt Management Account	1,801,925	1,736,652
Total Assets	1,801,925	1,736,652
Client funds		
NLDF funds	1,801,925	1,736,652
Total client funds	1,801,925	1,736,652

The notes on pages 33 to 35 form part of these accounts.

Jo Whelan

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt

11 June 2025

Statement of cash flows

For the year ended 31 March 2025

	2025 £000	2024 £000
Operating activities		
Interest received on deposits with the Debt Management Account	87,247	81,876
Increase in demand deposits with the Debt Management Account	(66,283)	(74,668)
Net cash from operating activities	20,964	7,208
Financing activities		
Funds received from NLDF	1,787,884	1,688,795
Funds paid to NLDF	(1,808,848)	(1,696,003)
Net cash used in financing activities	(20,964)	(7,208)
Increase in cash	-	-
Cash at the beginning of the year	-	-
Cash at the end of the year	-	-

The notes on pages 33 to 35 form part of these accounts.

Statement of changes in client funds

For the year ended 31 March 2025

	Total NLDF funds £000
At 31 March 2023	1,659,892
Total comprehensive income	83,968
Funds received from NLDF	1,688,795
Funds paid to NLDF	(1,696,003)
At 31 March 2024	1,736,652
Total comprehensive income	86,237
Funds received from NLDF	1,787,884
Funds paid to NLDF	(1,808,848)
At 31 March 2025	1,801,925

The notes on pages 33 to 35 form part of these accounts.

Notes to the accounts

For the year ended 31 March 2025

1 Accounting policies

(i) Basis of preparation

These accounts have been prepared in accordance with a direction made by HM Treasury under section 33(2) of the National Lottery etc. Act 1993 and in accordance with UK adopted international accounting standards as adapted or interpreted for the public sector context by the Government Financial Reporting Manual; and under the historical cost convention and on a going concern basis. In particular, the following standards have been applied:

- IFRS 7 Financial Instruments: Disclosures
- IFRS 9 Financial Instruments
- IFRS 13 Fair Value Measurement
- IAS 1 Presentation of Financial Statements (revised 2007)
- IAS 7 Statement of Cash Flows
- IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors
- IAS 10 Events After the Reporting Period
- IAS 24 Related Party Disclosures
- IAS 32 Financial Instruments: Presentation
- IAS 36 Impairment of Assets
- IAS 37 Provisions, Contingent Liabilities and Contingent Assets

Certain IFRS have been issued or revised, but are not yet effective. Those issues or revisions expected to be relevant in subsequent reporting periods are:

- IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures
 - These have been amended by *Amendments to the Classification and Measurement of Financial Instruments (Amendments to IFRS 9 and IFRS 7)* to address matters identified during the post-implementation review of the classification and measurement requirements of *IFRS 9 Financial Instruments*. Application is required for reporting periods beginning on or after 1 January 2026. The NLDFIA expects to apply these revisions to IFRS 9 and IFRS 7 in 2026-2027. The application of these revisions, which affect specific issues relating to derecognition of certain financial liabilities, classification of certain financial assets and specific disclosures, are not expected to materially alter the presentation of the financial statements of the NLDFIA.
 - These have been amended by *Annual Improvements to IFRS Accounting Standards — Volume 11*. Application is required for reporting periods beginning on or after 1 January 2026. The NLDFIA expects to apply these revisions to IFRS 9 and IFRS 7 in 2026-2027. The application of these revisions, which address a small number of very specific issues relating to IFRS 9 and

IFRS 7, are not expected to materially alter the presentation of the financial statements of the NLDFIA.

- IFRS 18 Presentation and Disclosure in Financial Statements, which is a new standard issued by the International Accounting Standards Board. Application is required for reporting periods beginning on or after 1 January 2027. The DMA expects to apply IFRS 18 in 2027-2028. The application of IFRS 18, which replaces IAS 1 'Presentation of Financial Statements', aims at improving how entities communicate in their financial statements. This will likely alter the presentation of the financial statements of the NLDFIA.

A separate income statement, as required by the accounts direction, has not been presented as the content would be identical to the statement of comprehensive income. A statement of comprehensive income is required by IAS 1.

(ii) Assets

Deposits with the Debt Management Account are financial assets held by the NLDFIA in order to collect contractual cash flows of principal and interest on specified dates. Therefore, these deposits are treated as financial assets measured at amortised cost.

(iii) Income recognition

Interest income is recognised using the effective interest rate method. The effective interest rate is the rate that exactly discounts estimated future cash receipts or payments through the expected life of the financial instrument or, where appropriate, a shorter period, to the net carrying amount of the instrument.

(iv) Administrative costs

Administrative costs are accounted for in the DMO Annual Report and Accounts 2024-2025 and a recovery is made from the Department for Culture, Media & Sport.

2 Risk

(i) Credit risk

Credit risk is the risk that a counterparty, or security issuer, will fail to discharge a contractual obligation resulting in financial loss to the NLDFIA.

The investments of the NLDFIA comprised deposits with the Debt Management Account. These deposits were considered to have no exposure to credit risk because they are obligations of HM Government.

There were no renegotiated assets or assets considered impaired at 31 March 2025 (31 March 2024: no renegotiated or impaired assets).

(ii) Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk for the NLDFIA was considered to comprise interest rate risk.

The interest returns on deposits were closely linked to the official Bank Rate.

CRND monitored interest rate movements to help inform the NLDF of potential issues and events. The NLDFIA was not subject to active management and thus no formal market risk parameters were in place.

(iii) Liquidity risk

Liquidity risk is the risk that the NLDFIA will encounter difficulty in meeting obligations associated with client withdrawal requests.

Assets held by the NLDFIA were highly liquid to enable all client obligations to be met as they fell due.

3 Related party transactions

CRND is a separate entity within the DMO. CRND client mandates are kept distinct from other DMO business.

During the year, the NLDFIA had a significant number of material transactions with the Debt Management Account, which is operated by the DMO. CRND's client mandates required the bulk of the funds to be invested in gilts or deposited with the Debt Management Account. The amount held by the Debt Management Account is shown in the statement of financial position, and the interest received and movement in amounts deposited are shown in the statement of cash flows.

During the year, the NLDFIA had a significant number of material transactions with the NLDF due to monies deposited and withdrawn in respect of investments. During the year, the NLDF withdrew £21 million (net of advances) from the NLDFIA (2023-2024: £7 million net withdrawal).

4 Events after the reporting date

In accordance with the requirements of IAS 10, events after the reporting period are considered up to the date on which the Secretary and Comptroller General authorises the accounts for issue. This is interpreted as the date of the Certificate and Report of the Comptroller and Auditor General (page 28).

Accounts Direction

Accounts Direction given by the Treasury in accordance with section 33(2) of the National Lottery etc. Act 1993 (the Act)

1. This direction applies to the National Lottery Distribution Fund Investment Account.
2. The Commissioners for the Reduction of the National Debt shall prepare accounts for the financial year ended 31 March 2012 and subsequent financial years which give a true and fair view of the state of affairs of the Account at the reporting date, and of its income and cash flows for the year then ended.
3. The accounts shall be prepared in accordance with applicable accounting standards, and shall be consistent with relevant requirements of the extant Government Financial Reporting Manual.
4. The accounts shall present an income statement, a statement of comprehensive income, a statement of financial position, a statement of cash flows, and a statement of changes in client funds. The statement of financial position shall present assets and liabilities in order of liquidity.
5. The notes to the accounts shall include disclosure of assets and liabilities, and of income and expenditure, relating to other central government funds including the National Loans Fund.
6. The report shall include:
 - a. a brief history of the Account, and its statutory background;
 - b. an outline of the scope of the Account, its relationship to HM Treasury and other central funds, and its management arrangements;
 - c. a management commentary, including information on financial performance and financial position, which reflects the relationship between the Account and other central funds; and
 - d. a governance statement.
7. This accounts direction shall be reproduced as an appendix to the accounts.

This accounts direction supersedes all previous Directions issued by HM Treasury.

Chris Wobschall

Head, Assurance and Financial Reporting Policy

Her Majesty's Treasury

23 March 2012

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