



Report for:	Overview & Scrutiny Committee 6 th February 2012	Item number	
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Title:	Treasury Management Strategy Statement 2012/13 – 2014/15
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Report authorised by :	Director of Corporate Resources <i>J. Parker 26/1/12</i>
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Lead Officer:	Nicola Webb, Head of Finance – Treasury & Pensions nicola.webb@haringey.gov.uk 020 8489 3726
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Ward(s) affected: N/A	Report for Non Key Decision
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1. Describe the issue under consideration

- 1.1 To present the proposed Treasury Management Strategy Statement and Prudential Indicators for 2012/13 to 2014/15 to this Committee for scrutiny before being presented to full Council for approval.

2. Cabinet Member Introduction

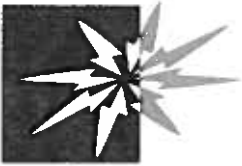
- 2.1 Not applicable.

3. Recommendations

- 3.1 That the proposed Treasury Management Strategy Statement and Prudential Indicators for 2012/13 to 2014/15 at Appendix 1 is scrutinised and comments made prior to its presentation to Council for approval.

4. Other options considered

- 4.1 None.



5. Background information

- 5.1 The CIPFA Treasury Management Code of Practice requires all local authorities to agree a Treasury Management Strategy Statement including an Investment Strategy annually in advance of the financial year. The strategy should incorporate the setting of the Council's prudential indicators for the three forthcoming financial years.
- 5.2 The CIPFA Treasury Management Code of Practice requires that the Treasury Management Strategy Statement is formulated by the Committee responsible for the monitoring of treasury management, is then subject to scrutiny before being approved by full Council. Following the Governance review in 2011, Corporate Committee is responsible for formulating the Treasury Management Strategy Statement for recommendation to full Council through Overview and Scrutiny Committee and in consultation with the Cabinet Member for Finance.
- 5.3 Corporate Committee considered the proposed Treasury Management Strategy Statement on 23rd January 2012. The Cabinet Member for Finance and Carbon Reduction had previously been consulted on the statement earlier in January 2012.

6. Comments of the Chief Financial Officer and Financial Implications

- 6.1 The approval of a Treasury Management Strategy Statement and prudential indicators are requirements of the CIPFA Treasury Management Code of Practice and CIPFA Prudential Code. The proposed strategy of minimising borrowing and continuing to make use of internal balances not only minimises costs, but also reduces the credit risk associated with investments, as the amount being invested is low. Given the current low short term interest rate environment is expected to continue throughout 2012/13 and beyond, the interest rate risk associated with delaying borrowing is assessed to be low.

7. Head of Legal Services and Legal Implications

- 7.1 The Council must make arrangements for the proper administration of its financial affairs and its power of borrowing is set out in legislation. The Council is required to determine and keep under review its borrowing and in complying with this requirement it must have regard to the code of practice entitled the "Prudential Code for Capital Finance in Local Authorities" as published by CIPFA from time to time.



In addition, the Council adopted the CIPFA Treasury Management Code of Practice in May 2002.

- 7.2 As mentioned in this report the Code of Practice requires the Council to agree a Treasury Management Strategy Statement. In considering the report Members must take into account the expert financial advice available in within it and any further oral advice given at the meeting of the Committee.

8. Equalities and Community Cohesion Comments

- 8.1 There are no equalities issues arising from this report.

9. Head of Procurement Comments

- 9.1 Not applicable.

10. Policy Implications

- 10.1 None applicable.

11. Use of Appendices

- 11.1 Appendix 1: Draft Treasury Management Strategy Statement 2012/13 – 2014/15.

12. Local Government (Access to Information) Act 1985

- 12.1 Not applicable.

13. Proposed Treasury Management Strategy Statement

- 13.1 The proposed Treasury Management Strategy Statement set out in Appendix 1 was considered by Corporate Committee on 23rd January 2012 before being presented to this Committee for scrutiny in advance of being presented to full Council in February 2012 as part of the Financial Planning report for 2012/13 to 2014/15.

- 13.2 All the figures in this document are based on current plans for the revenue budget and capital programme. This means they are subject to any changes to these plans and, therefore, the statement will be updated for required adjustments before submission to full Council. In particular, it should be noted that any decision by the Council to undertake new borrowing for housing will cause the future years' debt predictions for the HRA debt pool to increase.



- 13.3 In 2012/13 a continuation of very low short term interest rates compared to medium and long term rates is expected throughout the year. This means that there will be an on-going “cost of carry” if funds are borrowed in advance of capital expenditure being incurred. Therefore the Council plans to continue to run a strategy of keeping cash balances low and invested short term and to borrow only when required.
- 13.4 The introduction of self financing of housing will have a significant impact on the borrowing strategy during 2012/13. It is expected that debt of £232m will be repaid by the government as part of the conversion and then the General Fund and HRA debt will be split into two pools. The splitting is being done for clarity and transparency, however management of both debt pools will remain the responsibility of the Section 151 officer of the Council.
- 13.5 In recent months most UK banks have been downgraded by the credit rating agencies to a level below the minimum long term credit rating of A+ set in the Treasury Management Strategy Statement for 2011/12. The credit rating agencies’ reasoning for the downgrades was a lower level of expected support from governments in the future. In the case of the UK, it is on the basis of the Independent Banking Commission’s proposed reforms, which are not likely to be introduced for some years. Given the timescale of the reforms and the substantial government ownership of RBS and Lloyds Bank, it is proposed a lower minimum long term credit rating of A- is applied to UK banks in 2012/13. A- is still within the banding described as “high credit quality” by the rating agencies.
- 13.6 Corporate Committee considered adding non UK banks to the list of institutions the Council can lend to in 2012/13, however the Committee resolved not to extend the lending list beyond UK institutions and approved money market funds at the present time. The attached draft Treasury Management Strategy Statement reflects this decision.
- 13.7 The proposed limits for time and amounts are maximum limits, and the list of counterparties is the broadest range which can be used. However operationally the limits applied and counterparties used are reviewed regularly and where necessary restricted in response to any concerns about creditworthiness to ensure security of investments remains the priority for the Council.

**Treasury Management Strategy Statement
and Investment Strategy 2012/13 to 2014/15**

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1. Background

- 1.1 The Chartered Institute of Public Finance and Accountancy's Code of Practice for Treasury Management in Public Services (the "CIPFA TM Code") and the Prudential Code require local authorities to determine the Treasury Management Strategy Statement (TMSS) and Prudential Indicators on an annual basis. The TMSS also incorporates the Investment Strategy as required under the Communities and Local Government (CLG) Department's Investment Guidance.
- 1.2 CIPFA has defined Treasury Management as:
"the management of the organisation's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."
- 1.3 The Council is responsible for its treasury decisions and activity. No treasury management activity is without risk. The successful identification, monitoring and control of risk are integral elements of treasury management activities and include Credit and Counterparty Risk, Liquidity Risk, Market or Interest Rate Risk, Refinancing Risk and Legal and Regulatory Risk.
- 1.4 The strategy takes into account the impact of the Council's proposed Revenue Budget and Capital Programme on the Balance Sheet position, the current and projected Treasury position, the Prudential Indicators and the outlook for interest rates.
- 1.5 The purpose of this report is to propose:
- An updated Treasury Policy Statement – discussed in Section 2 and set out in Annex 1
 - Treasury Management Strategy - Borrowing in Section 5, Investments in Section 6
 - Prudential Indicators – these are detailed throughout the report and summarised in Annex 3
 - MRP Statement – Section 10

2. CIPFA Treasury Management Code of Practice

- 2.1 Adoption of the CIPFA Treasury Management Code of Practice is one of the Prudential Indicators. The Council originally adopted the Code of Practice in May 2002. Revisions to the Code in 2009 were reflected in updated versions of all policies and procedures in early 2010.
- 2.2 In November 2011 a further revised version of the Code of Practice was published. There are a number of minor amendments which have been incorporated into this draft Treasury Management Strategy. The main change is a requirement to update the Council's Treasury Policy

Statement to make reference to the Council's high level approach to borrowing and investment. A proposed revised version of this Statement based on CIPFA's recommended form of words is attached at Annex 1.

3. Self financing of Housing

- 3.1 The removal of the housing subsidy system is being implemented through a one-off reallocation of debt. The settlement of the reallocation is expected to take place on 28th March 2012 and will result in the Council having an expected reduction in PWLB debt of £232m achieved by a proportional repayment of each PWLB loan outstanding.
- 3.2 In line with guidance from CIPFA, it is proposed as part of the budget report that the Council's debt portfolio is split into two pools – one for HRA and one for General Fund. The information which follows in this report reflects the proposed method of splitting the debt.
- 3.3 Although it is proposed that there will be two debt pools going forward, all the loans remain a debt of the overall Council and therefore the responsibility of the Section 151 officer. This strategy statement covers the management of both pools of debt. In the management of the two pools of debt, it may be beneficial for both pools if at times internal transfers take place.
- 3.4 In order to ensure that any internal transfer is equitable to both the General Fund and the HRA, it is proposed that an internal premium or discount policy be applied. This would be calculated using prevailing PWLB methodology and applying a discount rate based on the mid-point of the spread between the PWLB new borrowing and premature repayment rates relevant at the day of the exchange. However, although the CIPFA Treasury Management Code of Practice recommends such an approach, the legislation covering what can be charged to the HRA does not currently allow premiums to be charged. Therefore the policy will only be applied if the legislation is changed to enable it to be done or if a transfer can be carried out equitably without charging a premium.
- 3.5 HRA cash balances will continue to be managed in one pool with the Council's balances. Interest will be allocated to the HRA on the basis of the monthly cash balance and the average rate of interest earned across the combined pool.

4. Balance Sheet and Treasury Position

- 4.1 The underlying need to borrow for capital purposes, as measured by the Capital Financing Requirement (CFR), together with Balances and Reserves, are the core drivers of Treasury Management activity. The estimates for each pool, based on the current proposed Revenue Budget and Capital Programmes, are:

Table 1a: Treasury Position – General Fund

	31/03/2012 Estimate £000	31/03/2013 Estimate £000	31/03/2014 Estimate £000	31/03/2015 Estimate £000
General Fund CFR	307,087	298,765	288,768	275,302
Less: Share of Existing External Borrowing & Other Long Term Liabilities	211,682	179,818	168,558	160,464
Internal Borrowing	95,405	90,405	85,405	80,405
Cumulative Net Borrowing Requirement	0	28,542	34,805	34,433

Table 1b: Treasury Position – HRA

	31/03/2012 Estimate £000	31/03/2013 Estimate £000	31/03/2014 Estimate £000	31/03/2015 Estimate £000
HRA CFR	274,893	274,893	274,893	274,893
Less: Share of Existing External Borrowing & Other Long Term Liabilities	266,893	207,002	191,834	183,741
Internal Borrowing	8,000	8,000	8,000	8,000
Cumulative Net Borrowing Requirement	0	59,891	75,059	83,152

- 4.2 The tables above show how the Council's capital requirement is funded currently and how it is expected to be funded in the coming years. Due to the differential between short and long term interest rates (discussed in more detail in section 5), the Council has maximised the amount of internal borrowing that can be done. As interest rates are not expected to rise over the next three years, it is anticipated that a significant level of internal borrowing will continue, with the only reduction expected reflecting the planned movement in reserves. The borrowing requirement at the bottom of each of the tables shows how much external borrowing will be required to fund maturing external borrowing.
- 4.3 Ensuring that net physical borrowing (i.e. net of investments) does not exceed the CFR is a key indicator of prudence. There was no difficulty meeting this requirement in 2011-12, nor are there any difficulties envisaged for future years, as the levels of internal borrowing in tables 1a and 1b above demonstrate.
- 4.4 It is a requirement for the HRA CFR to remain with the limit of indebtedness or "debt cap" set by the Department of Communities and Local Government at the time of the implementation of self-financing. The table overleaf shows the current expected level of the HRA CFR and the

debt cap. Any decision by the Council to undertake new borrowing for housing will cause the future years' debt predictions for the HRA debt pool to increase.

Table 2: HRA Debt Cap

	31/03/2012 Estimate £000	31/03/2013 Estimate £000	31/03/2014 Estimate £000	31/03/2015 Estimate £000
HRA CFR	274,893	274,893	274,893	274,893
HRA Debt cap	329,577	329,577	329,577	329,577
Headroom	54,684	54,684	54,684	54,684

- 4.5 Table 3 below shows proposed capital expenditure over the coming three financial years. It is a requirement of the Prudential Code to ensure that capital expenditure remains within sustainable limits and, in particular, to consider the impact on Council Tax and in the case of the HRA, housing rent levels.

Table 3: Capital Expenditure

	2011/12 Approved £000	2011/12 Projected Out-turn £000	2012/13 Estimate £000	2013/14 Estimate £000	2014/15 Estimate £000
General	45,324	64,679	37,084	25,889	13,074
HRA	34,550	34,556	44,692	30,703	43,732
Total	79,874	99,235	81,776	56,592	56,806

- 4.6 Capital expenditure is expected to be financed as follows:

Table 4: Capital Financing

	2011/12 Approved £000	2011/12 Projected Out-turn £000	2012/13 Estimate £000	2013/14 Estimate £000	2014/15 Estimate £000
Capital receipts	11,358	13,258	6,950	8,550	4,678
Other grants & contributions	7,786	10,354	7,667	4,181	2,960
Government Grants	24,724	37,342	23,818	17,871	32,636
Major Repairs Allowance	12,420	10,856	0	0	0
Reserves / Revenue contributions	2,486	5,224	33,547	25,990	16,532
Total Financing	58,774	77,034	71,982	56,592	56,806
Borrowing	21,100	22,201	9,794	0	0
Total	79,874	99,235	81,776	56,592	56,806

- 4.7 As an indicator of affordability the table below shows the incremental impact of capital investment decisions on Council Tax and Housing Rent levels. The incremental impact is calculated by comparing the total revenue budget requirement of the current approved capital programme with an equivalent calculation of the revenue budget requirement arising from the proposed capital programme.

Table 5: Incremental Impact of Capital Investment Decisions

	2011/12 Approved £	2011/12 Projected Actual £	2012/13 Estimate £	2013/14 Estimate £	2014/15 Estimate £
Increase in Band D Council Tax	1.00	2.88	0.94	0.74	0.34
Increase in Average Weekly Housing Rents	0.02	0.01	0.21	0.19	0.13

- 4.8 The ratio of financing costs to the Council's net revenue stream is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet borrowing costs. The ratio is based on costs net of investment income.

Table 6: Ratio of Financing Costs to Net Revenue Stream

	2011/12 Approved %	2011/12 Projected Actual %	2012/13 Estimate %	2013/14 Estimate %	2014/15 Estimate %
General Fund	4.95	4.50	2.70	2.64	2.47
HRA	31.90	26.79	15.35	14.86	13.97

5. Borrowing Strategy

- 5.1 A breakdown of the Council's current and expected external borrowing plus other long-term liabilities is shown in Annex 2. This is measured in a manner consistent for comparison with the Operational Boundary and Authorised Limit.
- 5.2 The Authorised Limit sets the maximum level of external borrowing on a gross basis (i.e. not net of investments) and is the statutory limit determined under Section 3(1) of the Local Government Act 2003 (referred to in the legislation as the Affordable Limit). The Prudential Indicator separately identifies borrowing from other long term liabilities such as finance leases. The Authorised Limit has been set on the estimate of the most likely, prudent but not worst case scenario with sufficient headroom over and above this to allow for unusual cash movements.

Table 7: Authorised Limit for External Debt

	2011/12 Approved £000	2011/12 Projected Actual £000	2012/13 Estimate £000	2013/14 Estimate £000	2014/15 Estimate £000
Borrowing	861,544	390,495	639,706	633,944	624,825
Other Long-term Liabilities	85,335	88,080	151,114	143,491	135,666
Total	946,879	478,575	790,820	777,435	760,491

- 5.3 The Operational Boundary links directly to the Council's estimates of the CFR and estimates of other cashflow requirements. This indicator is based on the same estimates as the Authorised Limit reflecting the most likely, prudent but not worst case scenario but without the additional headroom included within the Authorised Limit.

Table 8: Operational Boundary for External Debt

	2011/12 Approved £000	2011/12 Projected Actual £000	2012/13 Estimate £000	2013/14 Estimate £000	2014/15 Estimate £000
Borrowing	761,544	390,495	539,706	533,944	524,825
Other Long-term Liabilities	56,890	88,080	100,742	95,660	90,444
Total	818,434	478,575	640,448	629,604	615,269

- 5.4 The Director of Corporate Resources has delegated authority, within the total limit for any individual year, to effect movement between the separately agreed limits for borrowing and other long-term liabilities. Decisions will be based on the outcome of financial option appraisals and best value considerations. Any movement between these separate limits will be reported to the next meeting of Corporate Committee.
- 5.5 The proposed limits have reduced between 2011/12 and 2012/13 due to the reduction of debt arising from the removal of the housing subsidy system. The 2011/12 projected actual shown is at 31st March 2012 after the debt has been repaid in respect of housing.
- 5.6 The revised CIPFA Treasury Management Code of Practice has introduced a new treasury prudential indicator. It is the upper limit on the proportion of net debt to gross debt and it's purpose is to highlight a situation where the Council is planning to borrow in advance of need. The Council has no plans to do this. CIPFA has acknowledged that this indicator is flawed, because as it currently stands it does not achieve the stated aim. However it is a requirement for the Council to agree the indicator in its current form pending CIPFA's review of it. Once that review is completed a more suitable indicator will be reported to Council. The

table below shows the indicator as required by the Code i.e. the gross and net debt the Council expects to hold at the end of the coming financial years. The debt figures are the CFR figures from table 1 and the investment figures are estimates of the level of investments in each year.

Table 9: Limit on proportion of net debt to gross debt

	2011/12 Projected Actual £000	2012/13 Estimate £000	2013/14 Estimate £000	2014/15 Estimate £000
Borrowing	390,495	489,706	483,944	474,825
Other Long-term Liabilities	88,080	83,952	79,717	75,370
Gross Debt	478,575	573,658	563,661	550,195
Less: Investments	20,000	40,000	40,000	40,000
Net Debt	458,575	533,658	523,661	510,195

- 5.7 Treasury management and borrowing strategies in particular continue to be influenced not only by the absolute level of borrowing rates but also the relationship between short and long term interest rates. The interest rate forecast provided in Annex 4 indicates that an acute difference between short and longer term interest rates is expected to continue until 2014. This difference creates a "cost of carry" for any new longer term borrowing where the proceeds are temporarily held as investments because of the difference between what is paid on the borrowing and what is earned on the investment.
- 5.8 This "cost of carry" has been a feature of money markets since 2009-10 and by essentially lending its own surplus funds to itself (i.e. internal borrowing) the Council has minimised borrowing costs and reduced overall treasury risk by reducing the level of its external investment balances. As this position is expected to continue throughout 2012-13, there are no plans to replace this internal borrowing with external borrowing. However due to debt maturities in 2012-13, external borrowing of approximately £88m will be required.
- 5.9 The Council will adopt a flexible approach to this borrowing in consultation with its treasury management advisers, Arlingclose Ltd. The following issues will be considered prior to undertaking any external borrowing:
- Affordability;
 - Maturity profile of existing debt;
 - Interest rate and refinancing risk;
 - Borrowing source.
- 5.10 In conjunction with advice from its treasury management adviser, Arlingclose Ltd, the Council will keep under review the following borrowing options:

- PWLB loans
- Borrowing from other local authorities
- Borrowing from institutions such as the European Investment Bank and directly from Commercial Banks
- Borrowing from the Money Markets
- Capital markets (stock issues, commercial paper and bills)
- Structured finance
- Leasing

- 5.11 The “cost of carry” discussed above has resulted in an increased reliance upon shorter dated and variable rate borrowing. These types of borrowing inject volatility into the debt portfolio in terms of interest rate risk, however this is counterbalanced by its affordability and alignment of borrowing costs with investment returns. The Council’s exposure to shorter dated and variable rate borrowing is kept under regular review by reference to the difference between variable rate and longer term borrowing costs. A narrowing in the spread by 0.5% will result in an immediate and formal review of the borrowing strategy to determine whether the exposure to shorter dated and variable rates is maintained or altered.
- 5.12 The Council has £125m of loans which are LOBO loans (Lender’s Options Borrower’s Option) of which £50m of loans are currently in or will be in their call period in 2012/13. A LOBO is called when the Lender exercises its right to amend the interest rate on the loan at which point the Borrower can accept the revised terms or reject them and repay the loan. LOBO loans present a potential refinancing risk to the Council since the decision to call a LOBO is entirely at the lender’s discretion.
- 5.13 Following the repayment of PWLB debt in March 2012 as a result of the housing reform, LOBOs will make up a larger proportion of the total external debt portfolio, increasing from 20% to 32%. This increases the Council’s refinancing risk further. Any LOBO called will be discussed with the treasury advisers prior to the acceptance of any revised terms. The default position will be the repayment of the LOBO without penalty i.e. the revised terms will not be accepted.
- 5.14 The Council’s debt portfolio can be restructured by prematurely repaying loans and refinancing them on similar or different terms to achieve a reduction in risk and/or savings in interest costs. The lower interest rate environment and changes in the rules regarding the premature repayment of PWLB loans has adversely affected the scope to undertake meaningful debt restructuring, although occasional opportunities arise. The rationale for undertaking any debt rescheduling would be one or more of the following:
- Savings in risk adjusted interest costs
 - Rebalancing the interest rate structure of the debt portfolio
 - Changing the maturity profile of the debt portfolio.

As opportunities arise, they will be identified by Arlingclose and discussed with the Council's officers. Borrowing and rescheduling activity will be reported to Corporate Committee as part of the quarterly monitor reports.

- 5.15 The following Prudential Indicators allow the Council to manage the extent to which it is exposed to changes in interest rates. The upper limit for variable rate exposure has been set to ensure that the Council is not exposed to interest rate rises which could adversely impact on the revenue budget. The limit allows for the use of variable rate debt to offset exposure to changes in short-term rates on investments.
- 5.16 The Council's existing level of fixed interest rate exposure is 98.2% and variable rate exposure is 1.8%, however it is recommended that the limits in place for 2011/12 are maintained in future to retain flexibility.

Table 10: Fixed and Variable Interest Rate Exposure

	2011/12 Approved %	2011/12 Actual %	2012/13 Estimate %	2013/14 Estimate %	2014/15 Estimate %
Upper Limit for Fixed Interest Rate Exposure	100	98.2	100	100	100
Upper Limit for Variable Interest Rate Exposure	40	1.8	40	40	40

- 5.17 The Council is required to set limits on the percentage of the portfolio maturing in each of the periods set out in the table below. Limits in the following table are intended to control excessive exposures to volatility in interest rates when refinancing maturing debt. The limits have been set to reflect the current debt portfolio, and to allow enough flexibility to enable new borrowing to be taken for the optimum period. The limits apply to the combined General Fund and HRA debt pools.

Table 11: Maturity Structure of fixed rate borrowing

	Lower Limit %	Upper Limit %
under 12 months	0	40
12 months & within 2 years	0	35
2 years & within 5 years	0	35
5 years & within 10 years	0	35
10 years & within 20 years	0	35
20 years & within 30 years	0	35
30 years & within 40 years	0	35
40 years & within 50 years	0	50
50 years & above	0	50

6. Investment Policy and Strategy

- 6.1 Guidance from the Communities and Local Government Department (CLG) on Local Government Investments in England requires that an Annual Investment Strategy be set.
- 6.2 The Council's investment priorities are, in this order:
- security of the invested capital;
 - liquidity of the invested capital;
 - an optimum yield which is commensurate with security and liquidity.
- 6.3 Investments are categorised as 'Specified' or 'Non Specified' investments based on the criteria in the CLG Guidance. Instruments proposed for the Council's use within its investment strategy are contained in Annex 5 and the list of proposed counterparties is shown in Annex 6. In keeping with the strategy of maintaining low investment balances while internally borrowing, it is proposed only to use specified investments during 2012/13. The Director of Corporate Resources, under delegated powers, will undertake the most appropriate form of investments in keeping with the investment objectives, income and risk management requirements and Prudential Indicators. Investment activity will be reported to Corporate Committee as part of the quarterly reports.
- 6.4 Money markets remain in a volatile state, with little economic growth in most developed countries and ongoing concerns about the creditworthiness of eurozone countries. Given this backdrop, it is proposed to limit the proposed counterparty list to UK institutions and Money Market Funds only.
- 6.5 With all investments the Council makes there is a risk of default, so the proposed list of investments is prepared to minimise this risk by being selective about the counterparties to be used. In 2011-12 the minimum long term credit rating applied is A+, however many of the Council's counterparties have been downgraded below this. This has meant these counterparties have had to be removed from the Council's lending list.
- 6.6 The credit rating agencies' reasoning for the downgrades was a lower level of expected support from governments in the future. In the case of the UK, it is on the basis of the Independent Banking Commission's proposed reforms, which are not likely to be introduced for some years. Given the timescale of the reforms and the substantial government ownership of RBS and Lloyds Bank, it is proposed a lower minimum long term credit rating of A- is applied to UK institutions. A- is still within the banding described as "high credit quality" by the rating agencies.
- 6.7 The Council banks with Nat West, which is currently rated A. Even if the credit rating falls below the minimum of A-, it is proposed that Nat West will continue to be used for short term liquidity arrangements (overnight and weekend investments) and business continuity arrangements.

- 6.8 All counterparties on the list are subjected to continual monitoring, in conjunction with the Council's treasury management advisers, to ensure that they continue to meet the high standard set. The range of information used to determine creditworthiness is:
- Credit ratings and credit rating watches
 - Credit Default Swaps (where quoted)
 - Sovereign support mechanisms/potential support from a well-resourced parent institution
 - Share prices
 - Macro-economic indicators
 - Corporate developments, news and articles, market sentiment.
- 6.9 If the monitoring reveals any concern about a counterparty's creditworthiness, it will be removed from the lending list with immediate effect. In any period of significant stress in the markets, the default position is for investments to be made with the Debt Management Office – either in the Debt Management Account Deposit Facility (DMADF) or UK Treasury Bills. (The rates of interest from the DMADF are below equivalent money market rates, but the returns are an acceptable trade-off for the guarantee that the Council's capital is secure.)
- 6.10 In order to diversify the investment portfolio, investments will be placed with a range of approved investment counterparties. Maximum investment levels with each counterparty are set out in Annex 5 will ensure prudent diversification is achieved.
- 6.11 Money Market Funds (MMFs) will be utilised and whilst they provide good diversification the Council will also seek to diversify any exposure by utilising more than one MMF. The Council will also restrict its exposure to MMFs with lower levels of funds under management and will not exceed 0.5% of the net asset value of the MMF.
- 6.12 The Council is required to set an upper limit for principal sums invested for over 364 days, as required by the Prudential Code. This limit is to contain exposure to the possibility of loss that may arise as a result of the Council having to seek early repayment of the sums invested. Given the current interest rate environment, the Council will not make investments for more than 364 days.

Table 12: Upper Limit for total principal sums invested over 364 days

	2011/12 Approved	2011/12 Projected Actual	2012/13 Estimate	2013/14 Estimate	2014/15 Estimate
	£000	£000	£000	£000	£000
Principal	20,000	0	0	0	0

7. Use of Financial Instruments for the Management of Risks

- 7.1 The revised CIPFA Treasury Management Code of Practice requires the Council to state if and how it will use financial instruments, such as derivatives. Currently, local authorities' legal power to use derivative instruments remains unclear. The General Power of Competence enshrined in the Localism Bill is not sufficiently explicit. Consequently, the Council does not intend to use derivatives. Should this position change, the Council may develop a detailed and robust risk management framework governing the use of derivatives, but such a change in strategy would require full Council approval.

8. Outlook for Interest Rates

- 8.1 The economic interest rate outlook provided by the Council's treasury management adviser, Arlingclose Ltd, is attached at Annex 4. The Council will reappraise its strategy from time to time and, if needs be, realign it with evolving market conditions and expectations for future interest rates.
- 8.2 The interest rate outlook shows that short term rates are expected to remain significantly lower than long term rates throughout 2012/13 and beyond. As discussed in section 4, for this reason it is anticipated that cash balances will be kept at a minimum throughout the financial year as the "cost of carry" will be significant for any borrowing taken before capital expenditure is incurred.

9. Balanced Budget Requirement

- 9.1 The Council complies with the provisions of Section 32 of the Local Government Finance Act 1992 to set a balanced budget.

10. MRP Statement

- 10.1 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2008 (SI 2008/414) place a duty on local authorities to make a prudent provision for debt redemption. Guidance on Minimum Revenue Provision has been issued by the Secretary of State and local authorities are required to "have regard" to such Guidance under section 21(1A) of the Local Government Act 2003.
- 10.2 The four MRP options available are:
- Option 1: Regulatory Method
 - Option 2: CFR Method
 - Option 3: Asset Life Method
 - Option 4: Depreciation Method

- 10.3 MRP in 2011/12: Options 1 and 2 may be used only for supported expenditure. Methods of making prudent provision for self financed expenditure include Options 3 and 4 (which may also be used for supported expenditure if the Council chooses).
- 10.4 It is a requirement for Council to approve the MRP statement before the start of the financial year. If it is ever proposed to vary the terms of the original MRP Statement during the year, a revised statement will be put to Council at that time.
- 10.5 It is proposed the Council will apply Option 1 in respect of supported capital expenditure and Option 3 in respect of unsupported capital expenditure. This is a continuation of current practice. MRP in respect of leases brought onto the Balance Sheet under the IFRS-based Code of Practice will match the annual principal repayment for the associated deferred liability.

11. Other Issues

Monitoring & Reporting

- 11.1 Corporate Committee will receive quarterly reports on treasury management activity and performance. This will include monitoring of the prudential indicators.
- 11.2 It is a requirement of the Treasury Management Code of Practice that an outturn report on treasury activity is produced after the financial year end, no later than 30th September. This will be reported to Corporate Committee, shared with the Cabinet member for Finance and then reported to full Council. Overview and Scrutiny Committee will be responsible for the scrutiny of treasury management activity and practices.
- 11.3 Officers monitor counterparties on a daily basis with advice from the Council's treasury management advisers to ensure that any creditworthiness concerns are addressed as soon as they arise. Senior management hold monthly meetings with the officers undertaking treasury management to monitor activity and to ensure all policies and procedures are being followed.

Training

- 11.4 CIPFA's Treasury Management Code of Practice requires the Director of Corporate Resources to ensure that all members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities.
- 11.5 Training was a common issue raised by the various reviews of treasury management carried out at a national and local level post Iceland three years ago. Given the significant amounts of money involved, it is crucial members have the necessary knowledge to take treasury management

decisions. Regular training sessions are arranged for members to keep their knowledge up to date.

Investment Consultants

- 11.6 The CLG's Guidance on local government investments recommends that the Investment Strategy should state:
"Whether and, if so, how the authority uses external contractors offering information, advice or assistance relating to investment and how the quality of any such service is controlled."
- 11.7 The Council has appointed Arlingclose Limited to provide information and advice about the types of investment the Council should undertake and the counterparties that should be used. Quarterly service review meetings take place to monitor the service and the appointment is formally reviewed in accordance with the Council's Contract Standing Orders.