

Report of the Section 151 Officer

**PRUDENTIAL INDICATORS AND TREASURY MANAGEMENT STRATEGY
2019-20**

1 Purpose of Report

- 1.1 The council is currently debt free and has no borrowing; however, if a capital investment scheme requires borrowing as financing and a strong business case that mitigates the cost of borrowing can be made this will be considered.
- 1.2 The council does have significant cash flows from service expenditure and the income, as well as revenue and capital reserves, all of which give rise to investment balances. The council follows the Chartered Institute for Public Finance and Accountancy (CIPFA) Treasury Management Code of Practice (the Code) and has adopted the requirements of the code, as part of its financial regulations. This report sets out policies and strategies which it needs to approve in order to comply fully with the Code.
- 1.3 The report also sets out the treasury indicators for members to monitor the council's performance over the coming financial year. This is a mandatory requirement.

2 Executive Summary

This report forms an essential and mandatory part of the council's treasury management process, and provides the Resources Committee with the opportunity to approve/amend the policy and performance indicators as outlined in the report.

3 Appendices

Appendix A Treasury Management Strategy Statement including Minimum Revenue Provision Policy Statement and Annual Investment Strategy.

4 The Committee is invited to RECOMMEND to;

- 4.1 **APPROVE** the Treasury Management Strategy Statement set out in Appendix A of the report.
- 4.2 **AGREE** that ,based on a strong business case for investment and revenue returns to cover the costs, borrowing can be considered as a source of financing for certain capital schemes.

5 Background

The Revised CIPFA Treasury Management Code of Practice 2017

- 5.1 The council adopted the revised Treasury Management in the Public Services Code of Practice (the Code) in March 2010 and adopted updates in 2011.
- 5.2 In December 2017, CIPFA issued revised codes for Prudential and Treasury Management. The council has taken account of any changes that have been made in the codes but it needs to be noted that the guidance notes and the Ministry of Housing, Communities and Local Government (MHCLG) statutory guidance on Local Authority Investments have only recently been published. Officers are currently reviewing the guidance which means that this report and strategy may be subject to change and may need to be brought back to a later meeting for an in year update to be approved.
- 5.3 The Code emphasises a number of key areas of best practice to help limit the potential for loss, including the following:
- a) All councils must formally adopt the revised Code and four clauses.
 - b) The strategy report will affirm that the effective management and control of risk are prime objectives of the council's treasury management activities.
 - c) The council's appetite for risk must be clearly identified within the strategy report and will affirm that priority is given to security of capital and liquidity when investing funds and explain how that will be carried out.
 - d) Responsibility for risk management and control lies within the organisation and cannot be delegated to any outside organisation.
 - e) Credit ratings should only be used as a starting point when considering risk. Use should also be made of market data and information, the quality financial press, information on government support for banks and the credit ratings of that government support.
 - f) Councils need a sound diversification policy with high credit quality counterparties and should consider setting country, sector and group limits.
 - g) Borrowing in advance of need is only to be permissible when there is a clear business case for doing so and only for the current capital programme or to finance future debt maturities.
 - h) The main annual treasury management reports and in-year updates must be approved by full council.
 - i) There needs to be, at a minimum, a mid-year review of treasury management strategy and performance. This is intended to highlight any areas of concern that have arisen since the original strategy was approved.
 - j) Each council must delegate the role of scrutiny of treasury management strategy and policies to a specific named body; this is the Resources Committee at this council.

- k) Treasury management performance and policy setting should be subjected to prior scrutiny.
- l) Members should be provided with access to relevant training.
- m) Those charged with governance are also personally responsible for ensuring they have the necessary skills and training.
- n) Responsibility for these activities must be clearly defined within the organisation.
- o) Officers involved in treasury management must be explicitly required to follow treasury management policies and procedures when making investment and borrowing decisions on behalf of the council (this will form part of the updated Treasury Management Practices).

5.4 The attached strategy statement has been prepared in accordance with the revised Code. Accordingly, the council's treasury management strategy will be approved annually by the council and there will also be a mid-year report. The aim of these reporting arrangements is to ensure that those with ultimate responsibility for the treasury management function appreciate fully the implications of treasury management policies and activities, and that those implementing policies and executing transactions have properly fulfilled their responsibilities with regard to delegation and reporting.

5.5 For Wellingborough the following reporting arrangements are to be put in place in accordance with the requirements of the revised Code:

Area of Responsibility	Council/ Committee/Officer	Frequency
Treasury Management Strategy / Annual Investment Strategy / Minimum Revenue Provision (MRP) policy	Resources Committee recommends to council	March
Treasury Management Strategy / Annual Investment Strategy / MRP policy – mid-year report	Resources Committee recommends to council	October
Annual Treasury Outturn Report	Resources Committee recommends to council	Annually by 30 September after the end of the year
Treasury Management Practices	Section 151 Officer	Updated on an ongoing basis as appropriate

CIPFA Prudential Code

5.6 Included in this report are the CIPFA Treasury Management Indicators which are part of the Prudential Code on Local Authority borrowing. These indicators are:

- authorised limit for external debt
- operational boundary for external debt
- actual external debt.

All indicators have to be presented together as one suite. In addition, where there is a significant difference between the net and the gross borrowing position, the risks and benefits associated with this strategy should be clearly stated in the annual strategy.

Balanced Budget Requirement

5.7 It is a statutory requirement under Section 33 of the Local Government Finance Act 1992, for the council to produce a balanced budget. In particular, Section 32 requires a local authority to calculate its budget requirement for each financial year to include the revenue costs that flow from capital financing decisions. This, therefore, means that increases in the revenue impacts of capital expenditure must be limited to a level which is affordable. Such increases will be the result of: -

1. increases in interest charges or, in circumstances where the authority is debt free, reductions in overall interest receivable, that are caused by increased borrowing or reduced investment balance required to finance additional capital expenditure, and
2. increases in annual running costs from new capital projects.

6 Treasury Management Strategy for 2019-20

The Local Government Act 2003 (the Act) and supporting regulations requires the council to 'have regard to' the CIPFA Code of Practice on Local Authority Accounting, the Prudential Code for Capital Finance and the CIPFA Treasury Management Code of Practice to set prudential and treasury Indicators for the next three years to ensure that the council capital investment plans are affordable, prudent and sustainable. The Act requires the council to set out its treasury strategy for borrowing and to prepare an annual investment strategy setting out the council's policies for managing its investments for giving priority to the security and liquidity of those investments.

The recommended strategy for 2019-20 in respect of the following aspects of the treasury management function is based upon the treasury officers' views on interest rates, supplemented with leading market forecasts provided by the council's treasury adviser, Link Asset Services (appointed by tender). The Strategy Covers:

- Treasury limits in force which will limit the treasury risk and activities of the council
- Prudential and treasury Indicators
- The current treasury position
- The borrowing requirement
- Prospects for interest rates
- The borrowing strategy
- Policy on borrowing in advance of need
- The investment strategy
- Creditworthiness policy
- Policy on use of external service providers

6.1 Treasury Limits for 2019-20 to 2021-22

6.1.1 It is a statutory duty under Section 3 of the Act and supporting regulations, for the council to determine and keep under review how much it can afford to borrow. The amount so determined is termed the “Affordable Borrowing Limit”. In England and Wales the authorised limit represents the legislative limit specified in the Act.

6.1.2 Whilst termed an “Affordable Borrowing Limit”, the capital plans to be considered for inclusion incorporate financing by both external borrowing and other forms of liability, such as credit arrangements. The authorised limit is to be set, on a rolling basis, for the forthcoming financial year and two successive financial years, details of the authorised limit can be found in appendix A of this report. This shows that the budget plans for the Borough Council of Wellingborough are to remain debt free and thus borrowing to remain at nil. Provision has been made however for the council’s agreed £50,000 overdraft limit and up to £5m emergency temporary borrowing.

6.2 Prudential and Treasury Indicators for 2019-20 to 2021-22

6.2.1 Prudential and treasury indicators are needed for the purposes of setting an integrated treasury management strategy. The Borough Council of Wellingborough is forecasting to remain debt free under the 2019-20 to 2022-23 Medium Term Financial Plan.

6.2.2 The council is also required to indicate if it has adopted the CIPFA Code of Practice on Treasury Management. This original 2001 Code was adopted by the full council, and its subsequent updates have been adopted.

6.2.3 In December 2017, CIPFA issued revised Prudential and Treasury Management Codes. As from 2019-20, all local authorities will be required to provide additional information in the form of a Capital Strategy. The CIPFA Treasury and Capital Management Panel issued a statement that they recognise that this requirement may not be able to be fully implemented until the 2019/20 financial year.

6.3 Current Treasury position

6.3.1 The council’s investment policy was reviewed, as part of the 2019-20 budget setting. Section 6.7 of this report sets out details of the basis for approving the institutions which the council invests its funds with.

6.3.2 The in-house funds available for investment are largely cash flow and the capital receipts generated from the sale of assets. The council’s treasury investment portfolio position at 21 February 2019 comprised:

Table 1	Principal £m	Average rate %
Gross Debt	0.00	0.00
Total Investments	25.0	0.95

6.3.3 Funds available for investment have been estimated as part of the council's medium term budget projections. These estimates assume that capital receipts are realised and include the use of funds to finance the capital programme and use of revenue balances to meet revenue expenditure as required by the financial strategy, as follows:

2018/19	2019/20	2020/21	2021/22
£'000	£'000	£'000	£'000
25.673	24.006	23.267	20.878

6.4 Prospect for Interest Rates.

6.4.1 The council appointed by tender, Link Asset Services, as treasury advisor to the council, and part of this service is to assist the council to formulate a view on interest rates. From a review of a number of current City forecasts for short term (Bank Rate) and longer fixed term interest rates. The current unpredictable nature of the market beyond the next two years for investment, being a debt free authority, shows that the central view for that period is as follows:

Link Bank Rate forecast for financial year ends (as at February 21st 2019)

2018/19	0.75%
2019/20	1.00%
2020/21	1.50%
2021/22	2.00%

6.4.2 For the purposes of the 2019-20 Budget the level of investment income assumed has been based on an average return of 1% for new investments. This is in line with this advice and reflects current investment returns.

6.5 Borrowing Requirement & Strategy

6.5.1 The medium term financial plan assumes no borrowing requirement and is in line with previous decisions to maintain a debt free position. However, if a capital scheme for investment can demonstrate that the costs of borrowing are mitigated and a return can be made borrowing will be considered in future as a source of financing.

6.5.2 Policy on Borrowing in advance

The Prudential Code, issued by CIPFA contains a statement that local authorities should not borrow more than, or in advance of their needs purely in order to profit from the investment of the extra sum borrowed. However, as the council plans to remain debt free, it has no proposals to borrow in advance.

6.6 Annual Investment Strategy

Investment Policy

- 6.6.1 The council has regard to the CLG's Guidance on Local Government Investments ("the Guidance") issued in March 2004, revisions to that guidance, the Audit Commission's report on Icelandic investments and the 2009 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). The council's investment priorities are: -
- (a) the security of capital
 - (b) the liquidity of its investments.
 - (c) the yield from its investments
- 6.6.2 The generation of yield is distinct from these prudential objectives. Once proper levels of security and liquidity are determined, it will then be reasonable to consider what yield can be obtained consistent with these priorities. The risk appetite of this council is medium, in order to give priority to ensure greater security of its investments
- 6.6.3 Investment instruments identified for use in the financial year are listed in Appendix A. This list provides a guide as to which institutions are suitable to use but it will be amended as criteria of institutions change during the course of the year. The key drivers as to which institutions are suitable are as per paragraph 6.7.4, but officers also ensure that the overall creditworthiness policy is applied.
- 6.6.4 Investments will accordingly be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months).

6.7 Creditworthiness policy

- 6.7.1 As part of considering the 2019-20 Treasury Strategy, officers in conjunction with advice from the council's treasury advisors, have reviewed the list of financial institutions with whom the council places investments and associated investment periods to ensure the approach is both robust and prudent. Additional banks have been added to the list to provide a wider range of investment opportunities in the banking sector.
- 6.7.2 This council uses the creditworthiness service provided by Link Asset Services, its current treasury management advisors. This service uses a sophisticated modeling approach with credit ratings from all three rating agencies - Fitch, Moodys and Standard and Poors, forming the core element. However, it does not rely solely on the current credit ratings of counterparties but also uses the following as overlays:
- credit watches and credit outlooks from credit rating agencies
 - Credit Default Swaps (CDS) to give early warning of likely changes in credit ratings
 - sovereign ratings to select counterparties from only the most creditworthy countries

6.7.3 The council's investment decisions are based on comparisons between the changes priced into market rates against the council's and advisor's own forecasts. The Section 151 Officer, under delegated powers, will undertake the most appropriate form of investments depending on the prevailing interest rates at the time, taking into account the relevant risks.

6.7.4 All investments will also be made in accordance with the Government's investment guidelines. The classes of institution proposed for inclusion in the council's counterparty investment list are as follows: -

- UK domiciled banks
 - with a minimum long term Fitch rating of BBB+
 - with a minimum short term Fitch rating of F2
- Buildings societies with assets > £500m
- Non UK banks, domiciled in a country which has a minimum sovereign long term Fitch rating of AA (or equivalent)
- Other local authorities, Parish Councils, Treasury Bills and Government Gilts
- Money market funds (cash is invested with a fund holder)
- Certificates of Deposit (negotiable form of fixed deposit)

Country Limits

6.7.5 The council has determined that it will only use approved counterparties from countries with a minimum sovereign credit rating of AA from Fitch Ratings (or equivalent from other agencies if Fitch does not provide). This list will be added to or deducted from by officers should ratings change in accordance with this policy.

Levels of investment

6.7.6 To manage the council's risk, it currently applies an overall limit of no more than 25% of the total investments per institution and institution group. Subject to this the following individual limits are applied:

Banks

6.7.7 Part nationalised banks have the highest limits of £7m. The remaining UK domiciled banks have limits of £5m. The list of banks has been increased to provide a wider opportunity of potential investments.

6.7.8 At the Resources Committee in March 2018, Members approved the increase to the total credit level for Lloyds (part nationalised bank) to £7m. In order to cover the required payments under the new Business Rates Retention Scheme, to both CLG and to the pool lead authority.

- 6.7.9 As part of the 2019-20 budget process these levels have been reviewed, in line with payment profiles and it is necessary to request this level is increased to £7m. This higher balance should only occur around the payment date of each month to cover this eventuality. This will only be utilised when needed but will prevent the strategy from being breached and is reviewed annually.

Building Societies

- 6.7.10 Recent history suggests traditional Building Societies represent a relatively secure component of the financial markets. The institutions that have fallen into crisis are the banks and some of the Building Societies which have demutualised and followed a more risky business model.
- 6.7.11 In addition the larger Building Societies have a history of buying out any of the smaller societies if they encounter difficulties, however this cannot be assumed going forward. The council's Treasury Management advisors, Link Asset Services are currently advising that councils use only the Nationwide Building Society. In practice this would be very restrictive and the advice is not intended to be prescriptive. In order to minimise risk, officers take great care in considering the viability of counterparties before entering into any transactions.
- 6.7.12 The list of building societies available to invest with has increased as there are currently more societies which hold asset over £500m. Current policy is to ensure the level of investments with the building societies, is limited, to no more than £25m of the council's investments.

Local Authorities

- 6.7.13 A limit of £5m has been applied to other local authorities and / or Government backings such as Gilts. This is in line with the maximum risk exposure to the highest rated financial institutions. Due diligence checks will be made on the local authorities prior to lending.
- 6.7.14 All credit ratings will be monitored continually. The council is alerted to changes to ratings of all three agencies through its use of the Link creditworthiness service. If a downgrade results in the counterparty/investment scheme no longer meeting the council's minimum criteria, its further use as a new investment will be withdrawn immediately, and any existing investments will be immediately reviewed.

6.8 Policy on the use of external service providers

- 6.8.1 The council uses Link Asset Services as its external treasury management advisers. Sole reliance will not be placed on the use of this external service. In addition this council will also use market data and market information, information on government support for banks and the credit ratings of that government support.
- 6.8.2 The council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.

6.8.3 It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

6.9 Scheme of delegation

In addition to the Strategy there is a need for the treasury management function to be operated accordingly and with due regard to the Code of Practice. As such the delegations covering the management of this area are set out clearly in the council's Financial Procedure Rules.

7 Legal Powers

Local Government Act 2003

8 Financial and Value For Money Implications

There are no financial implications as a direct result of this report other than those noted in the body of the report and already accounted for in the 2019-20 budget.

9 Risk Analysis

Nature of risk	Consequences if realised	Likelihood of occurrence	Control measures
Unexpected fall in interest rates	Reduced income	Medium / High	Mix of short and longer term, fixed and variable rate investments.
Brexit	Volatile movements in the market	Medium	Regular review of the position and likely impacts.
Less funds available for investment	Reduced income	Medium / High	Regular budget monitoring allowing for remedial action to be taken.
Loss of capital	Reduced funds available for both capital and revenue purposes	Low	Financial ratings of counterparties and limits on amounts invested.

10 Implications for Resources

No direct implications.

11 Implications for Stronger and Safer Communities

No direct implications

12 Implications for Equalities

No direct implications

13 Author and Contact Officer

Tracey Cave, Service Accountant

14 Consultees

Shaun Darcy, Director, Section 151 Officer
Julie O'Connell, Finance Manager
Liz Elliott, Managing Director
Julie Thomas, Director

15 Background Papers

The CIPFA Prudential Code for Capital Finance in Local Authorities
CIPFA Code of Practice for Treasury Management in the Public Services
The CIPFA Code of Practice on Local Authority Accounting

Treasury Management Strategy Statement

Minimum Revenue Provision Policy Statement and Annual Investment Strategy

Borough Council of Wellingborough
2019-20

1 INTRODUCTION

1.1 Background

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

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

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

Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day to day treasury management activities.

CIPFA defines treasury management as:

“The management of the local authority'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.”

Revised reporting is required for the 2019/20 reporting cycle due to revisions of the MHCLG Investment Guidance, the MHCLG Minimum Revenue Provision (MRP) Guidance, the CIPFA Prudential Code and the CIPFA Treasury Management Code. The primary reporting changes include the introduction of a capital strategy, to provide a longer-term focus to the capital plans, and greater reporting requirements surrounding any commercial activity undertaken under the Localism Act 2011. The capital strategy is being reported separately.

1.2 Reporting requirements

1.2.2 Treasury Management reporting

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

Prudential and treasury indicators and treasury strategy (this report) -

The first, and most important report covers:

- the capital plans (including prudential indicators);
- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

A mid year treasury management report – This will update members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision.

An annual treasury report – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

Scrutiny

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

1.3 Treasury Management Strategy for 2019-20

The strategy for 2019-20 covers two main areas:

Capital issues

- the capital plans and the prudential indicators;
- the minimum revenue provision (MRP) strategy.

Treasury management issues

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and
- policy on use of external service providers.

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

1.4 Training

The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. The training needs of treasury management officers and members are periodically reviewed. In view of the recent and upcoming changes member training needs will be considered over the next financial year.

1.5 Treasury management consultants

The council uses Link Asset Services, Treasury solutions as its external treasury management advisors.

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

It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

The scope of investments within the council's operations now includes both conventional treasury investments, (the placing of residual cash from the council's functions), and more commercial type investments, such as investment properties. The commercial type investments require specialist advisers as the council see fit. The council currently uses Underwoods in relation to this activity.

2 THE CAPITAL PRUDENTIAL INDICATORS 2019-20 – 2021-22

The council's capital expenditure plans are a key driver of treasury management activity. The output of the capital expenditure plans is reflected in prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

2.1 Capital expenditure

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

Capital expenditure £m	2017/18 Actual	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
Non-HRA	1.911	7.021	2.551	0.050	0.025	0.000
HRA						
Total	1.911	7.021	2.551	0.050	0.025	0.000

Other long term liabilities

The financing need excludes any other long term liabilities, such as PFI and leasing arrangements which would already include borrowing instruments. However, at present the council has no such liabilities.

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

Capital expenditure £m	2017/18 Actual	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate
Capital receipts	0.837	9.950	0.000	0.000	0.000	0.000
Capital grants	0.530	0.902	1.090	0.000	0.000	0.000
Capital reserves	0.544	-3.831	1.461	0.050	0.025	0.000
Revenue	0	0	0	0	0	0
Net financing need for the year	0	0	0	0	0	0

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

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

The council, under the current Medium Term Financial Plan and Capital Programme, have no plans to borrow and therefore has a zero CFR.

2.3 Minimum revenue provision (MRP) policy statement

If the council were to borrow it would be required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).

CLG regulations have been issued which require the full council to approve **an MRP Statement** in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision. The council currently has no external borrowing nor any finance leases, nor are there any current plans to enter into any during 2019-20. This position may change in year depending on the need to finance capital schemes that can demonstrate a strong business case for investment and returns

that will cover the cost of financing , including MRP. The council is recommended to approve the following MRP Statement:

In the event that external financing or any finance lease is entered into during 2019-20, then the council will make provision in its revenue accounts each year to meet the costs of the Principal element of such borrowing and/or finance lease(s).

2.4 Core funds and expected investment balances

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

Year End Resources £m	2017/18 Actual	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate	2021/22 Estimate
Fund balances / reserves	7.412	5.635	5.179	4.240	1.626
Capital Reserves	17.361	20.038	18.827	19.027	19.252
Provisions	0.065	0	0	0	0
Total core funds	24.838	25.673	24.006	23.267	20.878
Working capital*	-1.260	-1.500	-1.500	-1.500	-1.500
Under/over borrowing	0	0	0	0	0
Expected investments	23.578	24.173	22.506	21.767	19.378

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

2.5 Affordability prudential indicators

A number of sections within this report cover the prudential indicators for overall capital and control of borrowing and within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the council's overall finances.

2.6 Ratio of financing costs to net revenue stream.

This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream. In other words in 2017/18 the interest earnings would be approximately 0.86% of the Council's net revenue spend. The indicator is negative because the council is debt free and therefore net interest is income to the council.

%	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
Non-HRA	-0.86%	-1.95%	-2.40%	-2.70%

The estimates of financing costs include current commitments and the proposals in this budget report.

3 BORROWING

3.1 Current portfolio position

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

The council, under the current Medium Term Financial Plan and Capital Programme, currently have no plans to borrow and therefore has a zero CFR. This will be amended if the need to borrow arises in year.

Total investments at 31 March					
Investments	24.838	25.673	24.006	23.267	20.878
Investment change		0.835	-1.667	-0.739	-2.389
Net Debt	-	-	-	-	-

3.2 Treasury Indicators: limits to borrowing activity

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

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

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

2. The council is asked to approve the following operational boundary and authorised limit:

Operational Boundary £m	2017/18	2018/19	2019/20	2020/21
Debt	0.00	0.00	10.00	10.00
Other long term liabilities	0.00	0.00	0.00	0.00
Total	0.00	0.00	10.00	10.00
Authorised limit £m	2017/18	2018/19	2019/20	2020/21
Debt	5.00	5.00	50.00	50.00
Other long term liabilities	0.05	0.05	0.50	0.50
Total	5.05	5.05	50.5	50.5

3.3 Prospects for interest rates

The council has appointed Link Asset Services as its treasury advisor and part of their service is to assist the council to formulate a view on interest rates. The following table is the latest position at the time of writing this report.

Link Asset Services Interest Rate View													
	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22
Bank Rate View	0.75%	0.75%	1.00%	1.00%	1.00%	1.25%	1.25%	1.25%	1.50%	1.50%	1.75%	1.75%	2.00%
3 Month LIBID	0.70%	0.80%	1.00%	1.10%	1.20%	1.40%	1.50%	1.50%	1.60%	1.70%	1.80%	1.90%	2.00%
6 Month LIBID	0.80%	0.90%	1.20%	1.30%	1.40%	1.50%	1.60%	1.70%	1.80%	1.90%	2.00%	2.10%	2.20%
12 Month LIBID	1.00%	1.10%	1.40%	1.50%	1.60%	1.70%	1.80%	1.90%	2.00%	2.10%	2.20%	2.30%	2.40%
5yr PWLB Rate	1.80%	1.90%	2.00%	2.10%	2.20%	2.30%	2.30%	2.40%	2.50%	2.50%	2.60%	2.60%	2.70%
10yr PWLB Rate	2.20%	2.30%	2.40%	2.50%	2.60%	2.60%	2.70%	2.80%	2.90%	2.90%	3.00%	3.00%	3.00%
25yr PWLB Rate	2.70%	2.80%	2.90%	3.00%	3.10%	3.20%	3.20%	3.30%	3.40%	3.40%	3.50%	3.50%	3.60%
50yr PWLB Rate	2.50%	2.60%	2.70%	2.80%	2.90%	3.00%	3.00%	3.10%	3.20%	3.20%	3.30%	3.30%	3.40%

The above forecasts are based on a major assumption that Parliament and the EU agree an orderly Brexit, either by 29 March or soon after. At their 7th February meeting, the MPC stated that future Bank Rate increases would be gradual and would rise to a much lower equilibrium rate, (where monetary policy is neither expansionary or contractionary), than before the crash; indeed they have given a figure for this of around 2.5% in ten years' time but have declined to give a medium term forecast.

Economic and interest rate forecasting therefore remains difficult with so many external influences weighing on the UK. The above forecasts, (and MPC decisions), will be liable to further amendment depending on how economic data and developments in financial markets transpire over the next year. Geopolitical developments, especially in the EU, could also have a major impact. Forecasts for average investment earnings beyond the three-year time horizon will be heavily dependent on economic and political developments, however, investment returns are likely to remain low during 2019/20 but will be on a gently rising trend over the next few years.

3.4 Borrowing strategy

The council currently has no external debt, nor is there any forecast requirement to enter into any with the time periods covered by this report. The council currently plans to use its capital reserves to fund its capital schemes. However, if such a scheme supported by a strong business case can be presented, that covers the cost of financing and makes a return for the council then borrowing may be considered as a source of finance..

The current strategy will remain that the council will not enter into any new borrowings, other than for short term arrangements should these be deemed necessary for cash flow purposes. However, if schemes are presented in year that requires borrowing as a source of finance the council will initially look to borrow from the Public Works Loans Board at the most advantageous rate.

Treasury management limits on activity

There are three debt related treasury activity limits. The purpose of these are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs / improve performance. The indicators are:

- Upper limits on variable interest rate exposure. This identifies a maximum limit for variable interest rates based upon the debt position net of investments
- Upper limits on fixed interest rate exposure. This is similar to the previous indicator and covers a maximum limit on fixed interest rates;
- Maturity structure of borrowing. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.

The council is asked to approve the following treasury indicators and limits:

£m	2018/19	2019/20	2020/21
Interest Rate Exposure	Upper	Upper	Upper
Limits on fixed interest rates: Debt/Investments	100%	100%	100%
Limits on variable interest rates: Debt/Investments	50%	50%	50%

3.5 Policy on borrowing in advance of need

The council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the council can ensure the security of such funds.

Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

3.6 Debt rescheduling

As short term borrowing rates will be considerably cheaper than longer term fixed interest rates, there may be potential opportunities to generate savings by switching from long term debt to short term debt. However, these savings will need to be considered in the light of the current treasury position and the size of the cost of debt repayment (premiums incurred).

The reasons for any rescheduling to take place will include:

- * the generation of cash savings and / or discounted cash flow savings;
- * helping to fulfil the treasury strategy;
- * enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).

Consideration will also be given to identify if there is any residual potential for making savings by running down investment balances to repay debt prematurely as short term rates on investments are likely to be lower than rates paid on current debt.

All rescheduling will be reported to the council, at the earliest meeting following its action.

3.7 Municipal Bond Agency

It is possible that the Municipal Bond Agency will be offering loans to local authorities in the future. The Agency hopes that the borrowing rates will be lower than those offered by the Public Works Loan Board (PWLB). This Authority may make use of this new source of borrowing if and when appropriate.

4 ANNUAL INVESTMENT STRATEGY

4.1 Investment policy – management of risk

The MHCLG and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. This report deals solely with financial investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy, (a separate report).

The council's investment policy has regard to the following: -

- MHCLG's Guidance on Local Government Investments (“the Guidance”)
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 (“the Code”)
- CIPFA Treasury Management Guidance Notes 2018

The council's investment priorities will be security first, portfolio liquidity second and then yield, (return).

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

1. Minimum acceptable **credit criteria** are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
2. **Other information:** ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as “**credit default swaps**” and overlay that information on top of the credit ratings.
3. **Other information sources** used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
4. This authority has defined the list of **types of investment instruments** that the treasury management team are authorised to use. There are two lists in appendix 5.4 under the categories of ‘specified’ and ‘non-specified’ investments.
 - **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year.
 - **Non-specified investments** are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use.
5. **Non-specified investments limit.** The Council has determined that it will limit the maximum total exposure to non-specified investments as being 10% of the total investment portfolio, (see paragraph 4.3).
6. **Lending limits**, (amounts and maturity), for each counterparty will be set through applying the matrix table in paragraph 4.2.
7. **Transaction limits** are set for each type of investment in 4.2.

8. This authority will set a limit for the amount of its investments which are invested for **longer than 365 days**, (see paragraph 4.4).
9. Investments will only be placed with counterparties from countries with a specified minimum **sovereign rating**, (see paragraph 4.3).
10. This authority has engaged **external consultants**, (see paragraph 1.5), to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
11. All investments will be denominated in **sterling**.

As a result of the change in accounting standards for 2018/19 under IFRS 9, this authority will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the Ministry of Housing, Communities and Local Government, [MHCLG], concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years commencing from 1.4.18.) As a result of the change in accounting standards for 2018/19 under IFRS 9, this authority will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the Ministry of Housing, Communities and Local Government, [MHCLG], concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years commencing from 1.4.18.)

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

Changes in risk management policy from last year.

The above criteria are unchanged from last year.

4.2 Creditworthiness policy

The primary principle governing the council's investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the council will ensure that:

- It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate security, and monitoring their

security. This is set out in the specified and non-specified investment sections below; and

- It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the council's prudential indicators covering the maximum principal sums invested.

The Section 151 Officer will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to council for approval as necessary. These criteria are separate to that which determines which types of investment instrument are either specified or non-specified as it provides an overall pool of counterparties considered high quality which the council may use, rather than defining what types of investment instruments are to be used.

All investments will be made in accordance with the Government's investment guidelines. The classes of institutions proposed for inclusion in the council's counterparty investment lists are as follows:-

- UK domiciled banks
 - with a minimum long term Fitch rating of BBB+
 - with a minimum short term Fitch rating of F2
- Non UK banks, domiciled in a country which has a minimum sovereign long term Fitch rating of AA (or equivalent)
- Bank subsidiary and treasury operation -. The Council will use these where the parent bank has provided an appropriate guarantee or has the necessary ratings outlined above.
- Building societies with assets > £500m
- Money market funds – (cash is invested with a fund holder)
- Other Local authorities, , Debt Management Account Deposit Facility (DMADF) Treasury Bills and Government Gilts
- Certificates of Deposit (negotiable form of fixed deposit)
- Supranational institutes

4.3 Time and monetary limits applying to investments.

The time and monetary limits for institutions on the council's counterparty list are as follows (these will cover both specified and non-specified investments):

	Min Fitch Long term Rating (or equivalent)	Money Limit	Time * Limit
Banks UK - long term rating	BBB+	£5m	2yrs
- short term	F2	£5m	1yr
Banks UK – part nationalised	N/A	£7m	2yrs
Banks Non UK - long term rating	AA	£3m	2yrs
- short term	F2	£3m	1yr
Building Societies 1 Assets >£1bn	N/A	£3m	18 Months
Building Societies 1 Assets >£500m <£1bn	N/A	£1m	1 year
Local authorities	N/A	£5m	1yr
DMADF	AA	unlimited	6 months
UK Government Gilts and Treasury Bills	UK Sovereign Rating	unlimited	1yr
Money market funds	AAA	£3m	liquid

- **Plus an additional 3 months where a part of the total exposure is represented by a commitment under a forward deal with a single institution**

4.4 Country and sector limits

Due care will be taken to consider the country, group and sector exposure of the council's investments.

The council has determined that it will only use approved counterparties from countries with a minimum sovereign credit rating of AA from Fitch or equivalent. The list of countries that qualify using this credit criterion will be regularly reviewed and maintained by officers.

In order to mitigate risk the council will avoid a concentration of investments in too few counterparties or countries by ensuring:

- no more than 25% will be placed with any non-UK country at any time;
- limits in place above will apply to a group of companies;
- sector limits will be monitored regularly for appropriateness.

Investment strategy

In-house funds.

Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months).

Investment returns expectations.

On the assumption that the UK and EU agree a Brexit deal in spring 2019 or soon after, then Bank Rate is forecast to increase steadily but slowly over the next few years to reach 2.00% by quarter 1 2022. Bank Rate forecasts for financial year ends (March) are:

2018/19 0.75%
 2019/20 1.00%
 2020/21 1.50%
 2021/22 2.00%

The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows:

Now
 2018/19 0.75%
 2019/20 1.20%
 2020/21 1.70%
 2021/22 2.20%
 2022/23 2.50%
 2023/24 2.70%
 Later years 3.00%

- The overall balance of risks to economic growth in the UK is probably neutral.
- The balance of risks to increases in Bank Rate and shorter term PWLB rates, are probably also even and are dependent on how strong GDP growth turns out, how slowly inflation pressures subside, and how quickly the Brexit negotiations move forward positively.

Investment treasury indicator and limit

The total principal funds invested for greater than 365 days. These limits are set with regard to the council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end.

The Council is asked to approve the treasury indicator and limit: -

Maximum principal sums invested > 365 days			
	2017/18	2018/19	2019/20
Principal sums invested >365 days	£10m	£10m	£10m

4.5 Investment risk benchmarking

This Council will use an investment benchmark to assess the investment performance of its investment portfolio of 7 day, 1, 3, 6 or 12 month LIBID rates, it is expected that an interest rate return above these levels will be achieved.

4.7 End of year investment report

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

5 APPENDICES

1. Treasury management scheme of delegation

5.1 APPENDIX: Treasury management scheme of delegation

(i) Full council

- receiving and reviewing reports on treasury management policies, practices and activities;
- approval of annual strategy.

(ii) Resources committee

- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
- budget consideration and approval;
- approval of the division of responsibilities;
- receiving and reviewing regular monitoring reports and acting on recommendations;
- approving the selection of external service providers and agreeing terms of appointment.

(iii) The S151 (responsible) Officer – including the responsibilities added in the 2017 Treasury Management Code.

- reviewing the treasury management policy and procedures and making recommendations to the responsible body.
- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long term timeframe
- ensuring that the capital strategy is prudent, sustainable, affordable and prudent in the long term and provides value for money
- ensuring that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the authority
- ensure that the authority has appropriate legal powers to undertake expenditure on non-financial assets and their financing
- ensuring the proportionality of all investments so that the authority does not undertake a level of investing which exposes the authority to an excessive level of risk compared to its financial resources
- ensuring that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long term liabilities
- provision to members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees
- ensuring that members are adequately informed and understand the risk exposures taken on by an authority

- ensuring that the authority has adequate expertise, either in house or externally provided, to carry out the above
- creation of Treasury Management Practices which specifically deal with how non treasury investments will be carried out and managed to include the following :
 - *Risk management (TMP1 and schedules), including investment and risk management criteria for any material non-treasury investment portfolios;*
 - *Performance measurement and management (TMP2 and schedules), including methodology and criteria for assessing the performance and success of non-treasury investments;*
 - *Decision making, governance and organisation (TMP5 and schedules), including a statement of the governance requirements for decision making in relation to non-treasury investments; and arrangements to ensure that appropriate professional due diligence is carried out to support decision making;*
 - *Reporting and management information (TMP6 and schedules), including where and how often monitoring reports are taken;*
 - *Training and qualifications (TMP10 and schedules), including how the relevant knowledge and skills in relation to non-treasury investments will be arranged.*

(iv) Deputy S151 Officer

- submitting regular treasury management policy reports;
- submitting budgets and budget variations;
- receiving and reviewing management information reports;
- reviewing the performance of the treasury management function;
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
- ensuring the adequacy of internal audit, and liaising with external audit;
- recommending the appointment of external service providers.

(v) Finance Manager/Treasury officer

- execution of transactions
- adherence to agreed policies and practices on a day-to-day basis
- maintaining relationships with counterparties and external service providers
- supervising treasury management staff
- monitoring performance on a day-to-day basis
- submitting management information reports to the responsible officer
- identifying and recommending opportunities for improved practices.