

**ST EDMUNDSBURY
BOROUGH COUNCIL**

***TREASURY
MANAGEMENT POLICY
STATEMENT &
INVESTMENT STRATEGY
2018/2019***

To be approved at Council 20 February 2018

TREASURY MANAGEMENT POLICY STATEMENT 2018/2019

1. The Council defines its treasury management activities as:

“The management of the organisation’s cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and pursuit of the optimum performance consistent with those risks”.

2. The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the Council, and any financial instruments entered into to manage these risks.

3. The Council acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.

4. The Council’s high level policies for borrowing and investments are detailed in the Investment Strategy paragraphs below.

INVESTMENT STRATEGY 2018/19

Introduction

5. Guidance from the Department for Communities and Local Government (CLG) on Local Government Investments in England requires that an Annual Investment Strategy be set by the Council.

6. The Chartered Institute of Public Finance and Accountancy’s (CIPFA) Treasury Management Code of Practice also sets out various requirements for the Council to meet including adoption of the following four clauses:

- The Council will create and maintain, as the cornerstones of effective treasury management:
 - a treasury management policy statement, stating the policies, objectives and approach to risk management of its treasury management activities
 - suitable treasury management practices (TMP’s), setting out the manner in which the council will seek to achieve those policies and objectives, and prescribing how it will management and control those activities

The content of the policy statement and TMP’s will follow the recommendations contained in Sections 6 & 7 of the Code, subject only to amendment where necessary to reflect the particular circumstances of the council. Such amendments will not result in the council materially deviating from the Code’s key principles.

- The Council (ie full council) will receive reports on its treasury management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the year, a mid-year review and an annual report after its close, in the form prescribed in its TMP's.
 - The Council delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices to the Treasury Management Sub-Committee and for the execution and administration of treasury management decisions to the Section 151 Officer, who will act in accordance with the organisation's policy statement and TMPs and, if he/she is a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management.
 - This organisation nominates the Performance and Audit Scrutiny Committee to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.
7. The Council's general policy objective is to invest surplus funds prudently. The Council's investment priorities are; security and liquidity of the capital at an optimum yield which is commensurate with security and liquidity.

Risk Management

8. The Council regards the successful identification, monitoring and control of risk to be prime criteria by which the effectiveness of its Treasury Management activities will be measured. The main risks to the Council's treasury activities are:
- Credit and Counterparty Risk – Security of the Council's Investments.
 - Market or Interest Rate Risk – Fluctuations in interest rate levels and thereby in the value of investments.
 - Liquidity Risk – Inadequate cash resources.
 - Inflation Risk – Exposure to inflation.
 - Legal and Regulatory Risk – Non compliance with Statutory and Regulatory requirements and the risk of fraud.
9. The above risks have been taken into account when setting the proposed Treasury Management Policy Statement and Investment Strategy. The risk that remains the Council's primary focus is that around the credit and counterparty risk and potential loss of its investments in a similar way to that following the Icelandic Banks collapse. The controls that the Strategy require are:
- credit worthiness checks of counterparties through the Council's external treasury advisor, Link Asset Services (previously known as Capita Asset Services) or
 - Asset Value checks assisting the Council to manage this risk.
10. Officers also have access, through the Council's treasury advisor, to real time market advice and expertise.
11. Further risk centres on the loss of interest receipts through decreased interest rates which has a direct impact on the Medium Term Financial Strategy (MTFS). Should the market move in an adverse direction, the actual receipts will be lower than forecast budgets and therefore have a detrimental effect on this revenue income stream to the MTFS. In the current climate this is a high risk for the Council but beyond its

control. The position will be monitored and actual interest receipts against forecast will be reported through Leadership Team and Performance, Audit and Scrutiny Committee, the outcome of which may require the Council to revise its MTFs accordingly.

12. Given the current volatility in financial markets and the performance of institutions, it is probable that status changes may occur during the next 12 months. Accordingly it may be necessary for Officers to update Members verbally as to the impact of these changes and, if appropriate, on alternative courses of action which may have to be considered in order for the Council to have worthwhile investment opportunities during the year.

Scheme of delegation and the role of the Section 151 officer

13. The Section 151 Officer, or Deputy Section 151 Officer, has delegated responsibility under the Treasury Management Code of Practice for the execution and administration of treasury management decisions.

14. The Section 151 Officer or Deputy Section 151 Officer may delegate their treasury management responsibilities to members of their staff. The full scheme of delegation can be found in the Council's Treasury Management Code of Practice (in the section TMP5 – Organisation, Clarity and Segregation of Responsibilities, and Dealing Arrangements).

15. Staff that have responsibility for the treasury function are required to have sufficient knowledge and expertise in treasury management to be able to understand and critically consider the advice provided by the Council's treasury consultants.

16. The training needs of staff are considered on a regular basis as part of the Council's appraisal process. The Section 151 Officer or Deputy Section 151 Officer will ensure that treasury management staff receive appropriate training and have the necessary skills to be able to undertake their duties effectively.

Use of External Brokers/Advisors/Fund Managers

17. The Council has approval for the use of fund managers, brokers and/or advisors.

18. The Council will ensure, through regular meetings and discussions with their fund managers, brokers and/or advisors, that the service is tailored to the Council's needs and strategic aims, and that they appreciate the Council's position on the balance between risk and reward in its treasury activities. The Council has regard to all the advice and information provided by the external support, but responsibility for treasury decisions remains with the Council.

Creditworthiness Policy & Lending Criteria

19. The Council needs to set investment criteria for its investments based on who is an appropriate institution to hold the Council deposits. Ideally any counterparty policy should spread investments over the maximum number of counterparties, who vary in type i.e. building societies or banks. However, the key concern of the counterparty policy is to manage risk in a practical way rather than stick to a theoretical ideal.

Usually those organisations or types of investments with the lower risk (best credit worthiness) are those that pay the lowest returns, those with lower credit worthiness have to pay the higher returns to attract investors. Therefore the Council must strike a balance of risk and return.

20. The Council uses the creditworthiness service provided by Link Asset Services (previously known as Capita Asset Services). This service uses a sophisticated modelling approach which uses all of the following to produce a colour coded rating for each institution:

- credit ratings from all three rating agencies - Fitch, Moodys and Standard and Poors
- credit watches and credit outlooks from credit rating agencies
- sovereign ratings to select counterparties from only the most creditworthy countries
- credit default swap (CDS) data

21. These colour codes are used by the Council to determine the creditworthiness of counterparties and the maximum duration and value of investments with individual banks and building societies. Where banks/building societies are part of a merged group structure, the limits are applied to the group as a whole.

22. Link Asset Services produces two colour codes for each counterparty. The first colour code is based upon the assessments of the credit rating agencies and takes account of rating watches and outlooks as well as changes in sovereign ratings. The second colour code also takes account of Credit Default Swap (CDS) data relating to individual counterparties, which can give an early warning of potential changes in credit ratings. The Council uses the first colour code to determine the maximum value and duration of investments, but remains mindful and takes into account CDS data provided by Link (particularly where CDS spread is shown as "out of range" within the Link model), together with other market data, when selecting the counterparties to use. Within this framework the Council will therefore use counterparties within the following colour coded bands:

Lending Criteria - Rated Banks and Investment Scheme

Capita Colour Code Key	Maximum Duration / Investment Values
Purple	Max £13m for max of 2 years (subject to max 50% of portfolio)
Orange	£12m for max of 2 years (subject to max 40% of portfolio)
Red	£11m for max of 1 year (subject to max 50% of portfolio)
Green	£9m for max of 6 months (subject to max 30% of portfolio)
Blue (nationalised / substantially owned by the UK government)	£18m for max of 2 years

23. The lending criteria for rated building societies is based on the same Link colour coding system as the rated banks.

Lending Criteria – Rated Building Societies

Capita Colour Code Key	Maximum Duration / Investment Values
Red	£11m for max of 1 year (subject to max 35% of portfolio)
Green	£7m for max of 1 year (subject to max 30% of portfolio)

24. All credit ratings will be monitored on an on-going basis. 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 for new investments will be withdrawn immediately.
- in addition to the use of Credit Ratings the Council will be advised of information in movements in Credit Default Swap against the iTraxx benchmark and other market data on a weekly basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

25. Sole reliance will not be placed on the use of this external service. In addition the Council will also use market data and market information (for example, as provided by the Council's brokers/fund managers), information on government support for banks and the credit ratings of that government support.

26. The majority of UK building societies do not obtain formal credit ratings and as such, investments with these organisations have to be treated with caution. In the absence of formal credit ratings Link advises caution in the use of such counterparties. The following credit criteria (based on asset values and other sources of financial and credit rating information) have been established by the Council in consultation with Link and seek to limit the value and duration of investments with these organisations.

Lending Criteria – Non Rated Building Societies (Asset Base Criteria)

Asset Base	Maximum Duration / Investment Values
Asset base > £2,500m	£6m for max 6 months
Asset base > £1,000m	£5m for max 6 months

27. In addition to the above asset base criteria the following additional criteria are applied:

- A commercial credit rating organisation, such as Dun and Bradstreet, to be used to provide credit rating reports on building societies, prior to the placing of funds, to ensure that the proposed investment values are within recommended credit limits
- Latest available accounts to be obtained and reviewed by in-house staff to establish key trends and to ensure that the credit rating recommendations are based on latest available financial results

- Review of available media coverage for any advance negative warnings regarding the stability of individual building societies.

28. The Head of Resources and Performance, in consultation with the Portfolio Holder for Performance and Resources, will continue to monitor the adequacy of the above lending criteria and make changes as necessary to respond to the changing economic climate and external advice. Details of any changes made will be included within the next treasury management reporting cycle to the Treasury Management Sub Committee, Performance and Audit Scrutiny, Cabinet and full Council.

29. In looking for security and a return on smaller investments the Council will continue to use deposit /call accounts with major banks and building societies on its approved counterparty list. In parallel with this option, and to deal with any further uncertainties in the financial markets, should the need arise the Council will place investments with the Debt Management Office through the Debt Management Agency Deposit Facility or with other Local Authorities direct. Whilst the rates of interest earned may be below market rates the Council's capital investments will be protected.

Investment Security - Specified and Unspecified Investments

30. The Secretary of State requires that the Council identifies institutions which will be used for specified and unspecified investments.

31. The definitions of specified and unspecified investments are shown below:

- An investment is a *specified investment* if all of the following apply:
 - (a) the investment is denominated in sterling and any payments or repayments in respect of the investment are payable only in sterling;
 - (b) the investment is not a long-term investment (1 year or more)
 - (c) the making of the investment is not defined as capital expenditure by virtue of regulation 25(1)(d) of the Local Authorities (Capital Finance and Accounting)(England) Regulations 2003 [SI 3146 as amended];
 - (d) the investment is made with a body or in an investment scheme of high credit quality (see below); or with one of the following public sector bodies:
 - i. the UK Government
 - ii. a local authority in England & Wales (as defined in section 23 of the 2003 Act) or similar body in Scotland or Northern Ireland
 - iii. a parish or community council.
- An *unspecified investment* is any other financial investment that is not a loan and does not meet the definition of a specified investment.

32. The criteria set for the use of specified and unspecified investments are set out below:

Specified Investments - All such investments will be sterling denominated, with maturities up to maximum of 1 year, meeting the minimum 'high' rating criteria where applicable.

	Minimum 'High' Credit Criteria
Debt Management Agency Deposit Facility	--
Treasury Bills	--
Term deposits – local authorities	--
Term deposits – banks and rated building societies (see separate table for credit criteria re non-rated building societies)	Based on Link's Colour Code system
Bonds issued by a financial institution which is guaranteed by the UK government	AAA
Certificates of deposits issued by banks and building societies	Short-term F1, Long-term A, Individual C, Support 2
Sovereign bond issues (non-UK)	AAA
Money Market Funds	Short-term F1, Long-term A, Individual C, Support 2

Non-Specified Investments - All such investments will be sterling denominated, with maturities over 1 year, meeting the minimum 'high' rating criteria where applicable, or with non rated organisations – ie non rated building societies.

A maximum of 90% will be held in aggregate in non-specified investments

	Minimum Credit Criteria	Max % of total investments	Max. maturity period
Term deposits – other LAs with maturities >1yr	-	50	2 years
Term deposits – non-rated building societies	See table above	90	1 year
Term deposits – banks and rated building societies with maturities >1yr	Based on Link's Colour Code system – see tables above	90	2 years
	Minimum Credit Criteria	Max % of total investments	Max. maturity period
Bonds issued by multilateral development banks with maturities >1yr	AAA	25	2 years
Bonds issued by a financial institution which is guaranteed by the UK government with maturities >1yr	AAA	25	2 years
Enhanced Cash Funds	AAA,S1	10	5 years

Investment Liquidity - Longer Term Investments

33.The following longer term investment restrictions will apply:-

- No more than £20M (nominal) can be invested for periods of 1 year or longer.

- No investments can be made for periods longer than 5 years.
- The total value of funds controlled by any individual advisor to the Council shall not exceed £30M (nominal).

On any day:

- No more than £15M (nominal) in total shall be held in investments where the remaining term up to the date of maturity is at least 4 years but not exceeding 5 years.
- No more than £20M (nominal) in total shall be held in investments where the remaining term up to the date of maturity exceeds 1 year.
- No more than 60% of the total value of investments held will be subject to a variable rate of return.

Borrowing/External Debt

34. The option of short or long term borrowing is available to the Council. However the Council must have regard to the Prudential Code when setting borrowing limits and must ensure that any borrowing is sustainable and affordable.

35. The Council's external debt as at 31 December 2017 was as follows:-

	£
Public Works Loan Board	0
Mortgages	0
Bonds	0
Temporary Loans	0
Long Term Loans	0

Council's Banker

36. On 1 April 2014 Lloyds Bank Plc became the Council's bank. On adoption of this strategy, the bank meets the credit criteria of F2 or above for short term investments. It is the Council's intention to use deposit and / or call accounts provided by Lloyds for short term liquidity requirements (e.g. overnight and weekend investments) and business continuity arrangements.

Balanced Budget Requirement

37. The Council complies with the provisions of S32 of the Local Government Finance Act 1992 to set a balanced budget.

Future Interest Rates

38. The Bank of England increased the Official Base rate to 0.50% on 2 November 2017. It has remained at this rate since.

39. Given the current economic situation it is difficult to forecast when the base rate will increase. The Council is working with its external fund managers and advisors to ensure that it maximises all of its returns on investments in line with the latest information available.

40. The average investment interest rates which are expected to apply to the Council's investments have been determined in consultation with the external advisors and have been included in the MTFS interest projections as follows:

- 2018/19 – 0.60%
- 2019/20 – 0.90%
- 2020/21 – 1.25%
- 2021/22 – 1.50%

Total Investments

41. Please see the following table for full details of the investments held by the Council as at 31 December 2017.

Counterparty Name	Value £	Interest Rate %	Investment Date	Date of Return
BANK OF SCOTLAND ACCOUNT Bank of Scotland Call Account	1,350,000	0.150		
NATWEST ACCOUNTS NatWest Call Account NatWest 95 Day Notice Account	300,000 0	0.250 0.000		
BARCLAYS ACCOUNT Barclays Reserve Account	100,000	0.010		
SANTANDER ACCOUNT Santander UK 365 Day Notice Account	8,000,000	1.050	19-Oct-15	No notice
TEMPORARY INVESTMENTS				
Bank of Scotland	5,000,000	0.900	13-Feb-17	12-Feb-18
Skipton Building Society	2,500,000	0.650	02-Jun-17	19-Mar-18
Skipton Building Society	3,000,000	0.770	05-Jun-17	05-Jun-18
Newcastle Building Society	6,000,000	0.650	03-Jul-17	15-Mar-18
Coventry Building Society	1,000,000	0.240	01-Sep-17	15-Jan-18
National Counties Building Society	1,000,000	0.390	02-Oct-17	15-Jan-18
National Counties Building Society	1,500,000	0.470	02-Oct-17	15-Feb-18
Principality Building Society	1,000,000	0.290	16-Oct-17	12-Feb-18
Yorkshire Building Society	5,000,000	0.200	01-Nov-17	22-Jan-18
Nottingham Building Society	3,000,000	0.470	01-Nov-17	19-Mar-18
Nottingham Building Society	1,000,000	0.520	01-Dec-17	07-Mar-18
Coventry Building Society	2,000,000	0.370	01-Dec-17	19-Feb-18
Yorkshire Building Society	2,000,000	0.400	01-Dec-17	19-Feb-18
Principality building Society	1,000,000	0.520	07-Dec-17	03-Apr-18
TOTAL VALUE OF INVESTMENTS HELD	44,750,000			

Capital Finance

42.The financing of the Council’s capital programme is considered by Cabinet and is ratified by Council. External financing is required to be inline with the Council’s approved Treasury Management and Investment Strategy and approved Prudential Indicators.

Treasury Management Code of Practice

43.The Treasury Management Code of Practice is the subject of a separate report approved by Council. The Code of Practice underpins the Strategy and provides further details regarding the operational requirements and processes regarding treasury management.

Prudential Indicators

44.The Council’s overall Treasury Management Strategy and Code of Practice links into the Council’s Prudential Indicators and Minimum Revenue Provision Policy which are subject to separate reports to Council. A summary of the treasury related indicators is as follows, however these may be subject to change during the final budget setting processes. The final Prudential Indicator figures will be approved by Council in February:

	2017/18	2017/18	2018/19	2019/20	2020/21
TREASURY MANAGEMENT PRUDENTIAL INDICATORS	£000	£000	£000	£000	£000
	Approved	Revised	Estimate	Estimate	Estimate
Authorised limit for external debt -					
Borrowing	£14,359	£7,056	£38,778	£40,943	£40,943
Other long term liabilities	£0	£0	£0	£0	£0
TOTAL	£14,359	££7,056	£38,778	£40,943	£40,943
Operational boundary for external debt -					
Borrowing	£12,923	£6,350	£34,900	£36,858	£36,858
Other long term liabilities	£0	£0	£0	£0	£0
TOTAL	£12,923	£6,350	£34,900	£36,858	£36,858
Maturity Structure of Borrowing					
Upper Limit for % of borrowing maturing in:					
• Under 12 Months	100%	100%	100%	100%	100%
• 1 - 2 years	20%	20%	20%	20%	20%
• 2 - 5 years	20%	20%	20%	20%	20%
• 5 - 10 years	20%	20%	20%	20%	20%
• Over 10 years	100%	100%	100%	100%	100%
The lower limit for all periods	0%	0%	0%	0%	0%

Upper limit for fixed interest rate exposure expressed as a % of total investments	100%	100%	100%	100%	100%
Upper limit for variable rate exposure expressed as a % of total investments	60%	60%	60%	60%	60%
Upper limit for total principal sums invested for over 364 days (per maturity date)	£20,000,000	£20,000,000	£20,000,000	£20,000,000	£20,000,000

Investments That Are Not Part Of The Treasury Management Activity

45. In addition to treasury management investment activities, the Council may invest in other financial assets and property primarily for financial return, these investments will be proportional to the level of resources available to the Council and the Council will ensure that the same robust procedures for consideration of risk and return are applied to these decisions.

Management practices for non-treasury investments.

46. This Council recognises that investment in other financial assets and property primarily for financial return, taken for non-treasury management purposes, requires careful investment management. Such activities includes loans supporting services outcomes, investments in subsidiaries, and investment property portfolios.

47. This Council will ensure that all council investments are covered in the capital strategy, investment strategy or equivalent, and will set out, where relevant, the organisation's risk appetite and specific policies and arrangements for non-treasury investments. It will recognise that the risk appetite for these activities may differ from that for treasury management.

48. The Council, in its Capital Strategy, will maintain a schedule setting out a summary of existing material investments, subsidiaries, joint ventures and liabilities including financial guarantees and the organisation's risk exposure.

49. The Council's Capital Strategy is held as a separate document which is approved by Council and is available on our website.