

# **Treasury Management Strategy Statement**

Minimum Revenue Provision Policy Statement  
and Annual Investment Strategy

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2023/24

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## Key Considerations

### **2021 revised CIPFA Treasury Management Code and Prudential Code – changes which will impact on future TMSS/AIS reports and the risk management framework**

CIPFA published the revised codes on 20 December 2021 and has stated that revisions need to be included in the reporting framework from the 2023/24 financial year. This Authority, therefore, has to have regard to these Codes of Practice when it prepares the Treasury Management Strategy Statement and Annual Investment Strategy, and also related reports during the financial year, which are taken to Full Council for approval.

### **The revised Treasury Management Code requires all investments and investment income to be attributed to one of the following three purposes: -**

#### **Treasury management**

Arising from the organisation's cash flows or treasury risk management activity, this type of investment represents balances that are only held until the cash is required for use. Treasury investments may also arise from other treasury risk management activity that seeks to prudently manage the risks, costs or income relating to existing or forecast debt or treasury investments.

#### **Service delivery**

Investments held primarily and directly for the delivery of public services including housing, regeneration and local infrastructure. Returns on this category of investment which are funded by borrowing are permitted only in cases where the income is "either related to the financial viability of the project in question or otherwise incidental to the primary purpose".

#### **Commercial return**

Investments held primarily for financial return with no treasury management or direct service provision purpose. Risks on such investments should be proportionate to an authority's financial capacity – i.e., that 'plausible losses' could be absorbed in budgets or reserves without unmanageable detriment to local services. An authority must not borrow to invest primarily for financial return.

### **The revised Treasury Management Code will require an authority to implement the following: -**

1. **Adopt a new liability benchmark treasury indicator** to support the financing risk management of the capital financing requirement; this is to be shown in chart form for a minimum of ten years, with material differences between the liability benchmark and actual loans to be explained;
2. **Long-term treasury investments**, (including pooled funds), are to be classed as commercial investments unless justified by a cash flow business case;
3. **Pooled funds** are to be included in the indicator for principal sums maturing in years beyond the initial budget year;
4. Amendment to the **knowledge and skills register** for officers and members involved in the treasury management function - to be proportionate to the size and complexity of the treasury management conducted by each authority;
5. **Reporting to members is to be done quarterly**. Specifically, the Chief Finance Officer (CFO) is required to establish procedures to monitor and report

performance against all forward-looking prudential indicators at least quarterly. The CFO is expected to establish a measurement and reporting process that highlights significant actual or forecast deviations from the approved indicators. However, monitoring of prudential indicators, including forecast debt and investments, is not required to be taken to Full Council and should be reported as part of the authority's integrated revenue, capital and balance sheet monitoring;

6. **Environmental, social and governance (ESG)** issues to be addressed within an authority's treasury management policies and practices (TMP1).

**The main requirements of the Prudential Code relating to service and commercial investments are: -**

1. The risks associated with service and commercial investments should be proportionate to their financial capacity – i.e. that plausible losses could be absorbed in budgets or reserves without unmanageable detriment to local services;
2. An authority must not borrow to invest for the primary purpose of commercial return;
3. It is not prudent for local authorities to make any investment or spending decision that will increase the CFR, and so may lead to new borrowing, unless directly and primarily related to the functions of the authority, and where any commercial returns are either related to the financial viability of the project in question or otherwise incidental to the primary purpose;
4. An annual review should be conducted to evaluate whether commercial investments should be sold to release funds to finance new capital expenditure or refinance maturing debt;
5. A prudential indicator is required for the net income from commercial and service investments as a proportion of the net revenue stream;
6. Create new Investment Management Practices to manage risks associated with non-treasury investments, (similar to the current Treasury Management Practices).

**An authority's Capital Strategy or Annual Investment Strategy should include: -**

1. The authority's approach to investments for service or commercial purposes (together referred to as non-treasury investments), including defining the authority's objectives, risk appetite and risk management in respect of these investments, and processes ensuring effective due diligence;
2. An assessment of affordability, prudence and proportionality in respect of the authority's overall financial capacity (i.e. whether plausible losses could be absorbed in budgets or reserves without unmanageable detriment to local services);
3. Details of financial and other risks of undertaking investments for service or commercial purposes and how these are managed;
4. Limits on total investments for service purposes and for commercial purposes respectively (consistent with any limits required by other statutory guidance on investments);
5. Requirements for independent and expert advice and scrutiny arrangements (while business cases may provide some of this material, the information contained in them will need to be periodically re-evaluated to inform the authority's overall strategy);

6. State compliance with paragraph 51 of the Prudential Code in relation to investments for commercial purposes, in particular the requirement that an authority must not borrow to invest primarily for financial return;

As this TMSS and AIS deals solely with treasury management investments, the categories of service delivery and commercial investments should be addressed as part of the Capital Strategy report.

However, as investments in commercial property have implications for cash balances managed by the treasury team, it will be for each authority to determine whether to add a high level summary of the impact that commercial investments have, or may have, if it is planned to liquidate such investments within the three year time horizon of this report, (or a longer time horizon if that is felt appropriate).

## 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 low 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, when it is prudent and economic, 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.

CIPFA defines treasury management as:

*“The management of the local authority's borrowing, investments and cash flows, including 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.”*

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.

## 1.2 Reporting requirements

### 1.2.1 Capital Strategy

The CIPFA 2021 Prudential and Treasury Management Codes require all local authorities to prepare a Capital Strategy report which will provide the following: -

- a high-level long-term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed
- the implications for future financial sustainability

The aim of the strategy is to ensure that all the Authority's elected members fully understand the overall long-term policy objectives and resulting Capital Strategy requirements, governance procedures and risk appetite.

### 1.2.2 Treasury Management reporting

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

- a. Prudential and treasury indicators and treasury strategy** (this report) - The first, and most important report is forward looking and 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).
- b. A mid-year treasury management report** – This is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether any policies require revision.
- c. An annual treasury report** – This is a backward looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

## Scrutiny

Before being recommended to the Council, the above reports are required to be adequately scrutinised. The Cabinet undertakes this role.

### 1.3 Treasury Management Strategy for 2023/24

The strategy for 2023/24 covers two main areas:

#### Capital issues

- the capital expenditure plans and the associated prudential indicators;
- the minimum revenue provision (MRP) policy.

#### Treasury management issues

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

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

### 1.4 Training

The CIPFA Treasury Management Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny.

Furthermore, pages 47 and 48 of the Code state that they expect “all organisations to have a formal and comprehensive knowledge and skills or training policy for the effective acquisition and retention of treasury management knowledge and skills for those responsible for management, delivery, governance and decision making.

The scale and nature of this will depend on the size and complexity of the organisation’s treasury management needs. Organisations should consider how to assess whether treasury management staff and board/ council members have the required knowledge and skills to undertake their roles and whether they have been able to maintain those skills and keep them up to date.

As a minimum, authorities should carry out the following to monitor and review knowledge and skills:

- Record attendance at training and ensure action is taken where poor attendance is identified.
- Prepare tailored learning plans for treasury management officers and board/council members.
- Require treasury management officers and board/council members to undertake self-assessment against the required competencies (as set out in the schedule that may be adopted by the organisation).

- Have regular communication with officers and board/council members, encouraging them to highlight training needs on an ongoing basis.”

In further support of the revised training requirements, CIPFA's Better Governance Forum and Treasury Management Network have produced a 'self-assessment by members responsible for the scrutiny of treasury management', which is available from the CIPFA website to download.

Members undertook training on 26 June 2019 and further training will be arranged as required.

There is a post with specific responsibility for treasury management within the accountancy team and the Council is committed to ensuring the holder has relevant qualifications and has access to the training and support required to undertake this role.

In addition, the Council's treasury management team is a member of the South West Treasury Management Benchmarking Group hosted by Link Asset Services. This group has members from approximately 14 authorities and provides a forum for interpreting Treasury Management data across the area and sharing best practice. The group also allows the opportunity to consider any potential forthcoming treasury management risks, the early identification of which can aid proactive investment management.

The Council maintains an internal audit function through the South West Audit Partnership (SWAP). SWAP undertakes a periodic internal audit review of the treasury management function. In the latest audit by SWAP, the treasury management function was given a Reasonable Opinion.

Further review is also provided by the external audit team, who consider the reporting of treasury management data within the financial statements as part of their external audit opinion work.

### **1.5 Treasury management consultants**

The Authority uses Link Group, Treasury solutions as its external treasury management advisors.

The Authority recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of 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 Authority 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 Authority's operations will include conventional treasury investments, (the placing of residual cash from the Authority's functions), and may include non-treasury investments. Non-treasury investments require specialist advisers, and the Authority will seek to appoint suitable specialist advisers in relation to such activity, as and when required.

## **1.6 Treasury management investments and other investments**

The Treasury Management Strategy Statement and Annual Investment Strategy deals solely with treasury management investments. In order to give an holistic view of the Authority's borrowing need, the report summarises service related loans to third parties and commercial investment activities. Other than this, these investments are not dealt with in this document.

## 2 THE CAPITAL PRUDENTIAL INDICATORS 2023/24 – 2025/26

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

*These indicators help show the effect of the financing and borrowing strategy that the Authority plans to adopt over the next three financial years (as a minimum).*

*The indicators also act as an early warning system, to flag up if the Authority decides to set capital programmes without the necessary finances to fund them.*

### 2.1 Capital expenditure and financing

This prudential indicator is a summary of the Authority's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts.

Gross Capital Expenditure to be incurred (Actual and Estimated)					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
General Fund	4,104	19,290	6,792	3,077	585
Service loans to third parties	1,108	49	49	46	23
Other loans to third parties	89	0	0	0	0
Service investments	0	0	0	0	0
Projects for yield	0	0	0	0	0
HRA	6,513	4,558	4,906	4,906	4,906
<b>Total Capital Expenditure</b>	<b>11,814</b>	<b>23,897</b>	<b>11,747</b>	<b>8,029</b>	<b>5,514</b>

*The above excludes other long-term liabilities, such as PFI and leasing arrangements that already include borrowing instruments.*

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

Financing of Capital Expenditure					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
<b>Total Capital Expenditure</b>	<b>11,814</b>	<b>23,897</b>	<b>11,747</b>	<b>8,029</b>	<b>5,514</b>
Capital receipts	(1,570)	(1,300)	(802)	(1,960)	(703)
Capital grants and other contributions	(3,292)	(5,055)	(1,482)	(795)	(754)
Direct revenue contributions	(2,159)	(2,279)	(1,279)	(1,279)	(1,279)
Use of earmarked reserves	(2,339)	(2,780)	(3,127)	(3,127)	(3,127)
<b>Financed in year</b>	<b>(9,360)</b>	<b>(11,414)</b>	<b>(6,690)</b>	<b>(7,161)</b>	<b>(5,863)</b>
<b>Net financing need for the year/ (surplus receipts)</b>	<b>2,454</b>	<b>12,483</b>	<b>5,057</b>	<b>868</b>	<b>(349)</b>

The net financing need is analysed as follows:

Analysis of net financing need					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
General Fund	(229)	13,134	5,110	2,181	(269)
Service loans to third parties	982	(640)	(43)	(1,303)	(75)
Other loans to third parties	78	(11)	(10)	(10)	(5)
Service investments	0	0	0	0	0
Projects for yield	0	0	0	0	0
HRA	1,623	0	0	0	0
<b>Net financing need</b>	<b>2,454</b>	<b>12,483</b>	<b>5,057</b>	<b>868</b>	<b>(349)</b>

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

The second prudential indicator is the Authority'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 Authority's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not been paid for immediately through a revenue or capital resource, will increase the CFR.

The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge that broadly reduces the indebtedness in line with each asset's life, and so charges the economic consumption of capital assets as they are used.

The CFR includes any other long-term liabilities (e.g. PFI and finance leases). Whilst these increase the CFR, and therefore the Authority's borrowing requirement, these types of scheme include a borrowing facility by the PFI, PPP lease provider and so the Authority is not required to borrow separately for these schemes. The Authority currently has no such schemes within the CFR.

The Authority is asked to approve the CFR projections below:

Capital Financing Requirement					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
General	2,293	15,345	20,112	21,833	21,066
Service loans to third parties	4,642	3,988	3,931	2,613	2,523
Other loans to third parties	467	456	447	437	432
Service investments	2,671	2,649	2,627	2,604	2,580
Projects for yield	0	0	0	0	0
<b>CFR General Fund</b>	<b>10,073</b>	<b>22,438</b>	<b>27,117</b>	<b>27,487</b>	<b>26,601</b>
<b>CFR HRA</b>	<b>84,658</b>	<b>84,649</b>	<b>84,640</b>	<b>84,631</b>	<b>84,620</b>
<b>Total CFR</b>	<b>94,731</b>	<b>107,087</b>	<b>111,757</b>	<b>112,118</b>	<b>111,221</b>
<b>Movement in CFR</b>	<b>2,137</b>	<b>12,356</b>	<b>4,670</b>	<b>361</b>	<b>(897)</b>

Movement in CFR represented by					
Net financing need for the year/ (surplus receipts)	2,454	12,483	5,057	868	(349)
Less MRP/VRP and other financing movements*	(317)	(126)	(389)	(506)	(547)

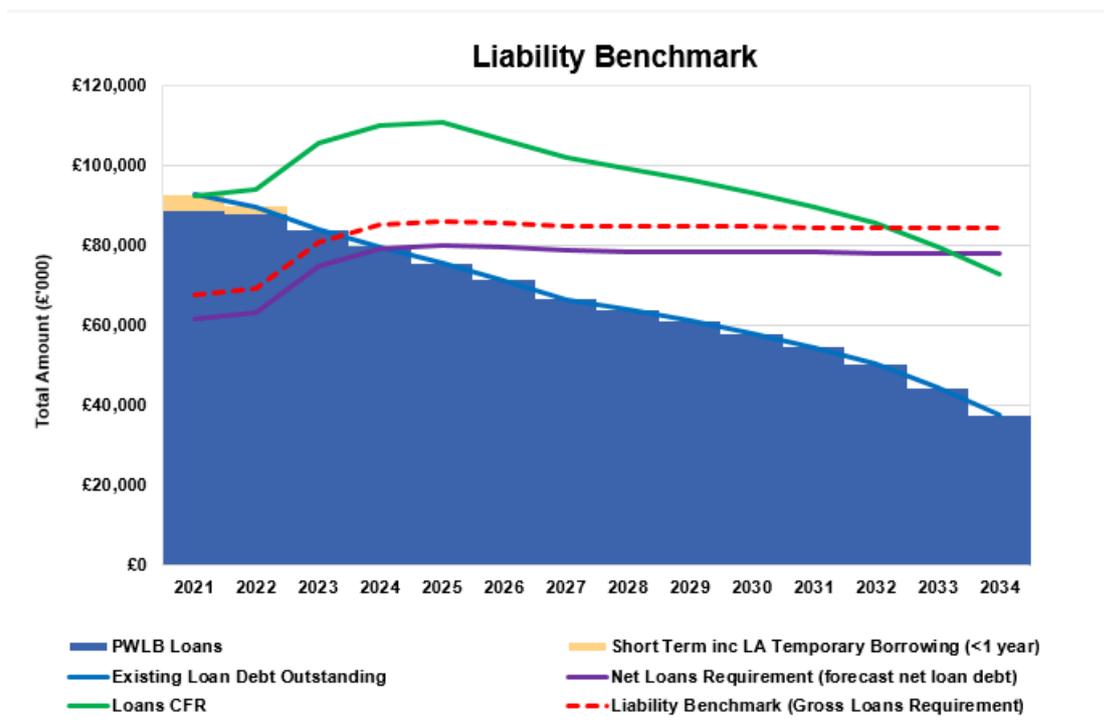
\* MRP = Minimum Revenue Provision. VRP = Voluntary Revenue Provision. Other financing movements will include any PFI/ finance lease annual principal amounts

## 2.3 Liability Benchmark

A third and new prudential indicator for 2023/24 is the Liability Benchmark (LB). The Authority is required to estimate and measure the LB for the forthcoming financial year and the following two financial years, as a minimum.

There are four components to the LB: -

1. **Existing loan debt outstanding:** the Authority's existing loans that are still outstanding in future years.
2. **Loans CFR:** this is calculated in accordance with the loans CFR definition in the Prudential Code and projected into the future based on approved prudential borrowing and planned MRP.
3. **Net loans requirement:** this will show the Authority's gross loan debt less treasury management investments at the last financial year-end, projected into the future and based on its approved prudential borrowing, planned MRP and any other major cash flows forecast.
4. **Liability benchmark (or gross loans requirement):** this equals net loans requirement plus short-term liquidity allowance.



An analysis of the above Liability Benchmark, which covers the period to 31 March 2034, is provided below:

1. As at the 31 March 2021, the starting point for the liability benchmark chart, the Authority had approximately £54m in treasury deposits. £31m was held in externally managed investments and £23m was held in deposits managed by the Authority's own treasury team. Usually, at the year-end, the amount of internally managed treasury deposits held by the Authority is minimal, however, since March 2020, grants for Covid 19, Homes for Ukraine and a number of other central government initiatives such as the Energy Rebate scheme, has meant the Authority is holding much larger cash deposits than usual. Some of

these will be repayable to central government and those that are not are expected to be expended in the next two or three years. It was felt that these “temporary” cash reserves of £23m would give a distorted picture of the liability benchmark calculations, hence only the externally managed investments been included.

2. Existing PWLB loan debt is shown as the blue bar chart. As PWLB loans mature, so the level of PWLB debt is declining over time. Much of this debt relates to the HRA. Each year, over the next 10 years, a HRA self-financing loan is due to mature.
3. At year-end 31 March 2021 and 2022, a short-term temporary borrowing requirement existed. The Authority’s bank current account was technically overdrawn at those year-ends, due to the interval between raising and debiting BACS payments. By the time the payments were presented through the bank, treasury deposits had been withdrawn to ensure sufficient funds were held in the bank current account.
4. The PWLB and the temporary borrowing requirement together are shown as the Existing Loan Debt Outstanding, (blue line).
5. The Net Loans Requirement, (purple line), shows existing and planned prudential borrowing, projected into the future, net of the external treasury investments. It is planned to refinance the aforementioned maturing HRA self-financing loans as they mature.
6. The Loans CFR, (green line), relates to capital expenditure planned that has not been funded and therefore gives rise to a financing need. As the capital expenditure plans in the document cover only the three years to 2025/26 but no further into the future, the Loans CFR level peaks at that point and starts to decline.
7. The Liability Benchmark or Gross Loans Requirement, (red line) is the Net Loans Requirement plus a short-term liquidity allowance\*. Any years where actual loans outstanding, (blue line), exceed the benchmark, (red line), represent an over-borrowed position. Any years where actual loans are less than the benchmark indicate a future borrowing requirement. The chart shows a future borrowing requirement in later years; much of this is due to HRA self-financing loans maturing. In recent years, the Authority has been re-financing maturing HRA self-finance loans and aims to continue with this policy.

*\*The Short-term liquidity allowance means an adequate (but not excessive) allowance for a level of excess cash to be invested short-term to provide access to liquidity if needed (due to short-term cash flow variations, for example).*

## 2.4 Minimum revenue provision (MRP) policy statement

Under Regulation 27 of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003, where the Authority has financed capital expenditure by borrowing it is required to make a provision each year through a revenue charge (MRP).

The Authority is required to calculate a prudent provision of MRP that ensures that the outstanding debt liability is repaid over a period that is reasonably commensurate with that over which the capital expenditure provides benefits. The MRP Guidance (2018) gives four ready-made options for calculating MRP, but the Authority can use any other reasonable basis that it can justify as prudent.

The MRP policy statement requires full council approval (or closest equivalent level) in advance of each financial year.

The Authority is recommended to approve the following MRP Statement.

From 1 April 2008 for all unsupported borrowing, the MRP policy will be:

- **Asset life method (annuity)** – MRP will be based on the estimated life of the assets;

Capital expenditure incurred during 2022/23 will not be subject to an MRP charge until 2023/24, or in the year after the asset becomes operational

The Authority will apply the asset life method for any expenditure capitalised under a Capitalisation Direction.

There is no requirement on the HRA to make a minimum revenue provision but there is a requirement for a charge for depreciation to be made.

MRP in respect of assets acquired under Finance Leases or PFI will be charged at an amount equal to the principal element of the annual repayment.

For capital expenditure on loans to third parties where the principal element of the loan is being repaid in annual instalments, the capital receipts arising from the principal loan repayments will be used to reduce the CFR instead of MRP.

Where no principal repayment is made in a given year, MRP will be charged at a rate in line with the life of the assets funded by the loan;

**MRP Overpayments** – Under the MRP guidance, any charges made in excess of the statutory MRP can be made, known as voluntary revenue provision (VRP).

VRP can be reclaimed in later years, if deemed necessary or prudent. In order for these sums to be reclaimed for use in the budget, this policy must disclose the cumulative overpayment made each year.

At 31 March 2022, cumulative VRP overpayments, (wholly in respect of the HRA), will be £4,451,410.

### 3 BORROWING

The capital expenditure plans set out in Section 2 provide details of the service activity of the Authority. The treasury management function ensures that the Authority's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Authority's Capital Strategy. 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.

#### 3.1 Current portfolio position

The overall treasury management portfolio as at 31 March 2022 and the position as at 31 December 2022 are shown below for both borrowing and investments.

A more detailed schedule of investments and borrowing can be found in Appendix 5.6.

<b>Treasury Portfolio</b>				
	<b>31.3.22</b>	<b>31.3.22</b>	<b>31.12.22</b>	<b>31.12.22</b>
	<b>Actual</b>	<b>Actual</b>	<b>Actual</b>	<b>Actual</b>
	<b>£000</b>	<b>%</b>	<b>£000</b>	<b>%</b>
<b>Treasury investments</b>				
Banks	6,000	7.37%	6,000	6.97%
Building Societies - unrated	2,000	2.46%	0	0.00%
Local Authorities	3,000	3.68%	0	0.00%
DMADF (HM Treasury)	30,650	37.64%	41,550	48.25%
Money Market Funds	9,000	11.05%	8,000	9.29%
<b>Total managed in house</b>	<b>50,650</b>	<b>62.20%</b>	<b>55,550</b>	<b>64.51%</b>
Money Market Funds*	30,779	37.80%	30,563	35.49%
Property Funds	0	0.00%	0	0.00%
<b>Total managed externally</b>	<b>30,779</b>	<b>37.80%</b>	<b>30,563</b>	<b>35.49%</b>
<b>Total treasury investments</b>	<b>81,429</b>	<b>100.00%</b>	<b>86,113</b>	<b>100.00%</b>
<b>Treasury external borrowing</b>				
PWLB	(87,853)	100.00%	(86,931)	100.00%
<b>Total external borrowing</b>	<b>(87,853)</b>	<b>100.00%</b>	<b>(86,931)</b>	<b>100.00%</b>
<b>Net treasury investments/ (borrowing)</b>	<b>(6,424)</b>		<b>(818)</b>	
<i>* market value</i>				

The Authority's forward projections for borrowing are summarised below. The table shows the actual external debt, against the underlying capital borrowing need, (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

<b>Gross External Debt</b>					
	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>
	<b>Actual</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
Borrowing at 1 April	92,756	89,729	89,277	88,333	87,813
OLTL at 1 April*	0	0	0	0	0
<b>External Debt at 1 April</b>	<b>92,756</b>	<b>89,729</b>	<b>89,277</b>	<b>88,333</b>	<b>87,813</b>
Expected change in borrowing	(3,027)	(452)	(944)	(520)	(86)
Expected change in OLTL*	0	0	0	0	0
<b>External Debt at 31 March</b>	<b>89,729</b>	<b>89,277</b>	<b>88,333</b>	<b>87,813</b>	<b>87,727</b>
<b>Capital Financing Requirement</b>	<b>94,731</b>	<b>107,087</b>	<b>111,757</b>	<b>112,118</b>	<b>111,221</b>
<b>Under/ (over) borrowing</b>	<b>5,002</b>	<b>17,810</b>	<b>23,424</b>	<b>24,305</b>	<b>23,494</b>

\* OLTL = other long term liabilities

Within the above figures, the level of debt relating to various activities is as follows:

<b>Purpose of debt</b>					
	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>
	<b>Actual</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
Temporary cashflow borrowing	1,876	2,350	2,350	2,350	2,350
General fund expenditure	2,147	1,300	437	0	0
Finance loans to third parties	1,048	978	906	833	757
Projects for yield	0	0	0	0	0
HRA capital expenditure	84,658	84,649	84,640	84,630	84,620
Proportion of total debt % used to finance loans to third parties and commercial activities	1.17%	1.10%	1.03%	0.95%	0.86%

Within the range of prudential indicators, there are a number of key indicators to ensure that the Authority operates its activities within well-defined limits. One of these is that the Authority needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2023/24 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue or speculative purposes.

The Director of Finance reports that the Authority complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

### 3.2 Treasury Indicators: limits to borrowing activity

**3.2.1 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. An additional £2.0m has been included to allow for potential increases in debt that might result from accounting changes following the implementation of IFRS 16 Leases on 1 April 2024: (other long-term liabilities).

Operational Boundary					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
Debt	92,756	89,729	89,277	88,333	87,813
Other long term liabilities	2,000	2,000	2,000	2,000	2,000
	<b>94,756</b>	<b>91,729</b>	<b>91,277</b>	<b>90,333</b>	<b>89,813</b>

**3.2.2 The authorised limit for external debt.** This is a key prudential indicator and represents a control on the maximum level of borrowing. This represents a legal 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 local authority plans, or those of a specific authority, although this power has not yet been exercised.
2. The Authority is asked to approve the following Authorised Limit.

Authorised Limit					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
Debt	98,934	95,915	95,472	94,537	94,027
Other long term liabilities	2,000	2,000	2,000	2,000	2,000
	<b>100,934</b>	<b>97,915</b>	<b>97,472</b>	<b>96,537</b>	<b>96,027</b>

The authorised limit includes an additional amount as headroom for unanticipated cash movements, including those due to slippage.

Within the above, headroom for the General Fund is set at £3.0m, and an additional £2.0m has been included to allow for potential increases in debt that might result from accounting changes following the implementation of IFRS 16 Leases on 1 April 2024: (other long term liabilities). Also within the above, for the HRA, a debt cap of £87.844m set by the Government as the authorised limit has been used; although the Government abolished HRA debt caps in October 2018, the Authority still uses it internally to define the maximum HRA CFR limit for its HRA self-financing regime. This internal limit is currently:

HRA Debt Limit					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
HRA debt cap*	87,844	87,844	87,844	87,844	87,844
HRA CFR	84,658	84,649	84,640	84,631	84,620
HRA headroom	3,186	3,195	3,204	3,213	3,224

\* The Government abolished debt caps in October 2018 but this is still used internally as a guideline.

### 3.3 Prospects for interest rates

See the Appendix, section 5.2.1

### 3.4 Borrowing strategy

The Authority is currently maintaining an under-borrowed position. This means that the capital borrowing need, (the Capital Financing Requirement), has not been fully funded with loan debt, as cash supporting the Authority's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as medium and longer dated borrowing rates are expected to fall from their current levels once prevailing inflation concerns are addressed by tighter near-term monetary policy. That is, Bank Rate increases over the remainder of 2022 and the first half of 2023.

Against this background and the risks within the economic forecast, caution will be adopted with the 2023/24 treasury operations. The Director of Finance will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- *if it was felt that there was a significant risk of a sharp FALL in long and short term rates, borrowing will be postponed.*
- *if it was felt that there was a significant risk of a much sharper RISE in borrowing rates than that currently forecast, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years*

Any decisions will be reported to the appropriate decision making body at the next available opportunity.

*In practice therefore, the borrowing strategy is dependent on the amount and timing of capital expenditure, given the market conditions at the time, and the capital-financing requirement is likely to be funded via a combination of external fund disinvestment and/or loans from the PWLB.*

- *In recent years, whilst interest rates have been low, the Authority has been re-financing its self-financing HRA loans as they have matured each year. They have been re-financed over 50 years. Whilst it is intended to continue with this policy, the Authority may temporarily delay re-financing, given that longer dated borrowing rates are expected to fall from their current levels; (see initial paragraph of 3.2 above).*

### 3.5 Cash Flow or Temporary Borrowing

In addition to borrowing for capital purposes, the Authority also borrows in the short-term to meet day-to-day shortages in its call account. This borrowing requirement is inherent within the operation of this account and is normally covered overnight via the call account overdraft and cleared the next day.

In some instances, particularly around the year-end, the overdraft may not provide a sufficient short-term buffer, and in these instances, the Authority can borrow via the market at fixed rates for a fixed term of less than 3 months.

### 3.6 Policy on borrowing in advance of need

The Authority 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 Authority can ensure the security of such funds.

Borrowing in advance will be made within the constraints that:

- It will be limited to no more than the expected increase in borrowing need (CFR) over the three year planning period; and
- The authority would not look to borrow more than 12 months in advance of need.

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.

### **3.7 Debt rescheduling**

Rescheduling of current borrowing in our debt portfolio is unlikely to occur, as there is still a very large difference between premature redemption rates and new borrowing rates.

If rescheduling is done, it will be reported to Cabinet at the earliest meeting following its action.

## **4. ANNUAL INVESTMENT STRATEGY**

### **4.1 Investment policy – management of risk**

The Department of Levelling Up, Housing and Communities (DLUHC - this was formerly the Ministry of Housing, Communities and Local Government (MHCLG)) and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. The s report deals solely with treasury (financial) investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets and service investments, are reported in this Treasury Management Strategy Report only in order to give an holistic view.

The Authority’s investment policy has regard to the following: -

- DLUHC’s Guidance on Local Government Investments (“the Guidance”).
- CIPFA Treasury Management 2021 (“the Code”).
- CIPFA Treasury Management Guidance Notes 2021.

The Authority’s investment priorities will be security first, portfolio liquidity second and then yield, (return). The Authority will aim to achieve the optimum return (yield) on its investments commensurate with proper levels of security and liquidity and with the Authority’s risk appetite.

In the current economic climate, it is considered appropriate to maintain a degree of liquidity to cover cash flow needs but to also consider “laddering” investments for periods up to 12 months with high credit rated financial institutions, whilst investment rates remain elevated, as well as wider range fund options.

The above guidance from the DLUHC and CIPFA places 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.
3. 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.
  - a. **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year or have less than a year left to run to maturity if originally they were classified as being non-specified investments solely due to the maturity period exceeding one year. *(Note: the operation of some building societies does not require a credit rating, although in every other respect the security of the society would match similarly sized societies with ratings. The lack of a credit rating means that non-rated building societies are automatically included in the non-specified investments category).*
  - b. **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.
4. **Non-specified investments limit.** The Authority has determined that it will limit the maximum total exposure to non-specified investments, (except for investments in non-rated building societies), as being £20m of the total investment portfolio at the point of investment, (see section 5.4).
5. **Lending limits**, (amounts and maturity), for each counterparty will be set through applying the table in section 4.3.
6. Only the Authority's external funds can be invested for **longer than 365 days**, (see section 5.1.4).
7. All investments will be denominated in **sterling**.
8. As a result of the change in accounting standards for 2022/23 under IFRS 9, this authority will consider the implications of investment instruments that 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 ending 31.3.23.) At the current

junction, it has not been determined whether a further extension to the over-ride will be agreed by Government.

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 section 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 Authority'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 Authority 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 section 5.4; 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 Authority's prudential indicators covering the maximum principal sums invested.

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

Credit rating information is supplied by the Link Group, our treasury advisors, on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. In addition a full review of the counterparty list is carried out on a regular basis.

The security of the Authority's financial assets is paramount, and whilst the strategy needs to be clear in this area it also needs to be sufficiently comprehensive and iterative in order to provide operational flexibility within, what at times, is a volatile macroeconomic environment. As the financial backdrop changes it is essential that the strategy is set to enable an efficient response to those changes.

The Authority manages the majority of its internal investments via money market funds and a range of banks and building societies in line with the creditworthiness criteria referred to below. Additionally the Authority has opened a Debt Management Deposit Account Facility with the UK Government's Debt Management Office.

In order to address the need for flexibility, and to ensure the spread of risk, access to an investment portal has been arranged which allows officers to review and potentially transact with a small range of money market funds directly. All money market funds

considered suitable with reference to the creditworthiness criteria will be approved for use by the Director of Finance before an account is opened. The Authority currently has access to three money market funds; if appropriate operationally, consideration will be given to opening additional money market funds in the future.

This strategy was changed to include corporate bonds within its creditworthiness criteria for the first time in 2016/17. Investments in corporate bonds are limited to a duration of less than 1 year, must be AAA rated and have a maximum value of £2m. The Authority will not trade corporate bonds directly, but will trade via a specialist investment intermediary, whose fee is linked to the return. Given the short duration, it is anticipated the majority of trades will be via the secondary market.

In the 2018/19 Treasury Management Strategy, the Authority approved the inclusion of alternative investments such as Property Funds in Non-Specified Investments.

The use of these instruments can be deemed capital expenditure, and as such will be an application (spending) of capital resources. This Authority will seek guidance on the status of any fund it may consider using. Appropriate due diligence will also be carried out before investment of this type is undertaken.

### 4.3 Creditworthiness Criteria

The Authority's proposed creditworthiness criteria are included in the table below.

<b>Creditworthiness Criteria</b>		
	<b>Criteria</b>	<b>Maximum Money and/ or % Investment Limit</b>
<b>External (Long Term) Investment Fund</b>		
Pooled Investment Schemes (e.g. bond funds)	AAA long-term rating backed up with lowest volatility (V1/S1)	60% of External Fund total
Alternative Investment Funds e.g. property funds	The use of these instruments can be deemed to be capital expenditure, and as such will be an application (spending) of capital resources. This Authority will seek guidance on the status of any fund it may consider using. Appropriate due diligence will also be carried out before investment of this type is undertaken.	£10m
<b>Cash Flow/ Internal Investments</b>		
Deposit Building Societies	With over £5 Billion in total assets	£3m
Deposit Building Societies	With over £1 Billion in total assets	£2m
Deposit with UK incorporated banks	Minimum F1, A1 or P1 short term backed up by A long term credit rating	£2m
Deposit with banks incorporated outside the UK but entitled to accept deposits in the UK	Minimum F1+, A1+ or P1+ short term backed up by AA- long term credit rating	£2m
Money Market Funds	AAA	£3m
UK Local, Police & Fire Authorities		£3m
UK Government Treasury Bills/ Gilts/ Debt Management Deposit Facility		No limit
Corporate Bonds	AAA and less than one year duration	£2m
<i>The "deposits" referred to in the above table relate either to cash, floating rate notes or certificates of deposit.</i>		

The Authority will not invest in subsidiaries that do not have a credit rating in their own right and a separate FSA licence from the parent company.

In the event of a downgrade resulting in a counterparty or investment scheme no longer meeting the Authority's minimum criteria, its further use as a new investment will be withdrawn immediately.

Any changes in counterparty ratings or other criteria that put the counterparty below the minimum criteria whilst the Authority holds a deposit will be brought to the attention of the Director of Finance and the Portfolio Holder for Finance immediately, with an appropriate response decided on a case-by-case basis.

The Authority's current counterparty list is included at section 5.5.

It is recommended that Cabinet approves the creditworthiness criteria above.

The proposed criteria for specified and non-specified investments are shown in Appendix 5.4 for approval.

#### **4.4 Investment strategy**

##### **4.4.1 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). Greater returns are usually obtainable by investing for longer periods. The current shape of the yield curve suggests that is the case at present, but there is the prospect of Bank Rate peaking in the first half of 2023 and possibly reducing as early as the latter part of 2023 so an agile investment strategy would be appropriate to optimise returns.

While most cash balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed.

##### **4.4.2 Investment returns expectations.**

The current forecast shown in appendix 5.2.1 includes a forecast for Bank Rate to reach 4.5% in Q2 2023.

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:

<b>Average earnings in each year</b>	
2022/23 (remainder)	3.95%
2023/24	4.40%
2024/25	3.30%
2025/26	2.60%
2026/27	2.50%
Years 6 to 10	2.80%
Years 10+	2.80%

As there are so many variables at this time, caution must be exercised in respect of all interest rate forecasts.

Against this view, the Treasury officers expect.....

For its cash flow generated balances, the Authority will seek to utilise its business reserve instant access and notice accounts, money market funds and short-dated deposits, (overnight to 100 days), in order to benefit from the compounding of interest.

#### 4.5 Investment performance / risk benchmarking

This Authority will use an investment benchmark to assess the investment performance of its investment portfolio of 7 day compounded SONIA (*Sterling Overnight Index Average*).

#### 4.6 End of year investment report

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

#### 4.7 External fund managers

The Authority currently has the following amounts invested:

<b>External funds</b>			
	<b>Fitch International Fund Quality Rating</b>	<b>Fitch Fund Market Sensitivity Rating</b>	<b>Total Investment (market value at 31.12.22) £000</b>
<b>Pooled investment vehicles, OEICS</b>			
Royal London Asset Management - Short Term Fixed Income Fund S Inc	AAAf	S1	15,481
Payden & Rygel - Sterling Reserve Fund	AAAf	S1	15,082
The AAAf Fund Quality Credit Rating reflects the very high credit quality of a fund, as measured by its weighted average rating factor.			
The S1 Fund Market Sensitivity Rating reflects a fund's very low sensitivity to market risk factors. It also takes into account the investment advisor's strong capabilities as well as the fund's sound legal and regulatory environment.			

<b>5</b>	<b>APPENDICES</b>	
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## 5.1 CAPITAL PRUDENTIAL & TREASURY INDICATORS 2023/24 – 2025/26

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

### 5.1.1 Capital Expenditure

This prudential indicator is a summary of the Authority's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts.

Gross Capital Expenditure to be incurred (Actual and Estimated)					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
General Fund	4,104	19,290	6,792	3,077	585
Service loans to third parties	1,108	49	49	46	23
Other loans to third parties	89	0	0	0	0
Service investments	0	0	0	0	0
Projects for yield	0	0	0	0	0
HRA	6,513	4,558	4,906	4,906	4,906
<b>Total Capital Expenditure</b>	<b>11,814</b>	<b>23,897</b>	<b>11,747</b>	<b>8,029</b>	<b>5,514</b>

*The above excludes other long-term liabilities, such as PFI and leasing arrangements that already include borrowing instruments.*

### 5.1.2 Affordability prudential indicators

The previous sections cover the overall capital and control of borrowing prudential indicators, but 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 Authority's overall finances. The Authority is asked to approve the following indicators:

#### a. 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), against the net revenue stream.

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

Ratio of financing costs to net revenue stream					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	%	%	%	%	%
General Fund	1.46%	1.02%	2.12%	2.60%	2.73%
HRA	23.05%	18.62%	17.67%	17.16%	16.83%

Note that previously, financing costs could be reduced by interest and investment income. This has been removed from the calculation in the 2021 CIPFA Prudential Code.

**b. Ratio of net income from commercial and service investments as a proportion of the net revenue stream**

Ratio of net income from commercial and service investments as proportion of net revenue stream					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	%	%	%	%	%
Service investments	0.95%	1.08%	0.87%	0.85%	0.84%
Commercial investments	0.00%	0.00%	0.00%	0.00%	0.00%

This indicator identifies the proportion of the general fund net revenue stream derived from service investments and commercial investments, (if any). The purpose of the indicator is to show the financial exposure of the Authority to this type of income.

**c. HRA ratios**

HRA ratio of debt to revenues					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
HRA debt	84,658	84,649	84,640	84,630	84,620
HRA revenues	18,038	18,617	19,875	21,049	21,470
	%	%	%	%	%
<b>Ratio of debt to revenues</b>	<b>469.33%</b>	<b>454.69%</b>	<b>425.86%</b>	<b>402.05%</b>	<b>394.12%</b>

The above indicator identifies the trend in the level of debt (borrowing and other long-term obligations).

HRA ratio of debt to revenues					
	2021/22	2022/23	2023/24	2024/25	2025/26
	Actual	Estimate	Estimate	Estimate	Estimate
HRA debt	£84,658,000	£84,649,000	£84,640,000	£84,630,000	£84,620,000
Number of HRA properties	4,170	4,158	4,146	4,146	4,146
<b>Debt per dwelling</b>	<b>£20,302</b>	<b>£20,358</b>	<b>£20,415</b>	<b>£20,412</b>	<b>£20,410</b>

### 5.1.3 Maturity structure of borrowing

Maturity structure of borrowing. *(This is the amount of projected long-term borrowing that is due for repayment in each period, expressed as a percentage of total borrowing).* These gross limits are set to reduce the Authority's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.

*At any point, the actual percentages of debt projected to mature in each year will add up to 100%, but the proposed indicator is for a range of approved percentages. This gives discretion within an approved range to the treasury team. It does mean that each 'set' of figures will sum to more than 100%.*

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

<b>Maturity Structure of fixed interest rate borrowing 2023/24</b>			
		<b>Lower</b>	<b>Upper</b>
Under 12 months	2023/24	0.00%	20.00%
12 months to 2 years	2024/25	0.00%	20.00%
2 years to 5 years	2025/26 to 2027/28	0.00%	25.00%
5 years to 10 years	2028/29 to 2032/33	0.00%	30.00%
10 years to 20 years	2033/34 to 2042/43	0.00%	45.00%
20 years to 30 years	2043/44 to 2052/53	0.00%	20.00%
30 years to 40 years	2053/54 to 2062/63	0.00%	20.00%
40 years to 50 years	2063/64 to 2072/73	0.00%	20.00%

Within the HRA, the majority of the loans are over the longer term, as aligned to the HRA business plan, resulting in the upper limit being higher from years 5– 20.

The upper limits on the maturity structure of borrowing will shift slightly each year as the maturity dates draw closer. However, the limits shown are in line with expectations based on the funding plans.

In addition to the above, the Authority has an overdraft limit of £0.35m and can, if required, borrow for periods less than 3 months at fixed rates, in order to meet daily cash flow requirements. The Strategy is managed to avoid short-term fixed borrowing where possible. With the exception of the bank overdraft therefore, all borrowing the Authority undertakes is at a fixed rate of interest.

The actual amounts maturing in each period are shown in the table below and reflect both the actual and potential loan commitments as referred to elsewhere within this strategy.

Based on capital borrowing plans included in the budget and plans for non-treasury loans, the current projected maturity structure of borrowing is shown below:

<b>Maturity Structure of fixed interest rate borrowing 2023/24</b>			
		<b>£'000</b>	<b>%</b>
Under 12 months	2023/24	3,807	4.33%
12 months to 2 years	2024/25	4,222	4.81%
2 years to 5 years	2025/26 to 2027/28	15,744	17.92%
5 years to 10 years	2028/29 to 2032/33	19,710	22.44%
10 years to 20 years	2033/34 to 2042/43	33,255	37.85%
20 years to 30 years	2043/44 to 2052/53	252	0.29%
30 years to 40 years	2053/54 to 2062/63	0	0.00%
40 years to 50 years	2063/64 to 2072/73	10,863	12.36%
<b>Total</b>		<b>87,853</b>	<b>100.00%</b>

#### **5.1.4 Control of Interest Rate Exposure**

Please see paragraphs 5.2.1, 3.4 and 4.4.

#### **5.1.5 Upper Limit for Total Principal Sums invested over 365 days**

This limit is set with regard to the Authority's liquidity requirements and to reduce the need for early sale of an investment. The Authority is asked to confirm approval that only external investments, (i.e. those managed by external fund managers), can be invested for over 365 days. Currently the Authority has £30.563m in specified investments with external fund managers. Although these investments have been held continuously for over 365 days, in practice, the Authority has been free to access the funds on quarter days without loss of income or access the funds with 3 days' notice, if necessary.

## 5.2 INTEREST RATES

### 5.2.1 The Prospects for Interest Rates

The Council has appointed Link Group as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. Link provided the following forecasts on 08.11.22. These are forecasts for certainty rates, gilt yields plus 80 bps.

Link Group Interest Rate View	08.11.22												
	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25
BANK RATE	3.50	4.25	4.50	4.50	4.50	4.00	3.75	3.50	3.25	3.00	2.75	2.50	2.50
3 month ave earnings	3.60	4.30	4.50	4.50	4.50	4.00	3.80	3.30	3.00	3.00	2.80	2.50	2.50
6 month ave earnings	4.20	4.50	4.60	4.50	4.20	4.10	3.90	3.40	3.10	3.00	2.90	2.60	2.60
12 month ave earnings	4.70	4.70	4.70	4.50	4.30	4.20	4.00	3.50	3.20	3.10	3.00	2.70	2.70
5 yr PWLB	4.30	4.30	4.20	4.10	4.00	3.90	3.80	3.60	3.50	3.40	3.30	3.20	3.10
10 yr PWLB	4.50	4.50	4.40	4.30	4.20	4.00	3.90	3.70	3.60	3.50	3.40	3.30	3.20
25 yr PWLB	4.70	4.70	4.60	4.50	4.40	4.30	4.10	4.00	3.90	3.70	3.60	3.50	3.50
50 yr PWLB	4.30	4.40	4.30	4.20	4.10	4.00	3.80	3.70	3.60	3.40	3.30	3.20	3.20

*Additional notes by Link on this forecast table: -*

Our central forecast reflects a view that the MPC will be keen to demonstrate its anti-inflation credentials by delivering a succession of rate increases. This has happened throughout 2022, but the new Government's policy of emphasising fiscal rectitude will probably mean Bank Rate does not now need to increase to further than 4.5%.

Further down the road, we anticipate the Bank of England will be keen to loosen monetary policy when the worst of the inflationary pressures have lessened – but that timing will be one of fine judgment: cut too soon, and inflationary pressures may well build up further; cut too late and any downturn or recession may be prolonged.

The CPI measure of inflation will peak at close to 11% in Q4 2022. Despite the cost-of-living squeeze that is still taking shape, the Bank will want to see evidence that wages are not spiralling upwards in what is evidently a very tight labour market. Wage increases, excluding bonuses, are currently running at 5.7%.

Regarding the plan to sell £10bn of gilts back into the market each quarter (Quantitative Tightening), this has started but will focus on the short to medium end of the curve for the present. This approach will prevent any further disruption to the longer end of the curve following on from the short-lived effects of the Truss/Kwarteng unfunded dash for growth policy.

In the upcoming months, our forecasts will be guided not only by economic data releases and clarifications from the MPC over its monetary policies and the Government over its fiscal policies, but the on-going conflict between Russia and Ukraine. (More recently, the heightened tensions between China/Taiwan/US also have the potential to have a wider and negative economic impact.)

On the positive side, consumers are still estimated to be sitting on over £160bn of excess savings left over from the pandemic so that will cushion some of the impact of the above challenges. However, most of those are held by more affluent people whereas lower income families already spend nearly all their income on essentials such as food, energy and rent/mortgage payments.

### PWLB RATES

Yield curve movements have become less volatile under the Sunak/Hunt government. PWLB 5 to 50 years Certainty Rates are, generally, in the range of 3.75% to 4.50%. The medium to longer part of the yield curve is currently inverted (yields are lower at the longer end of the yield curve compared to the short to medium end).

We view the markets as having built in, already, nearly all the effects on gilt yields of the likely increases in Bank Rate and the poor inflation outlook but markets are volatile and further whipsawing of gilt yields across the whole spectrum of the curve is possible.

**The balance of risks to the UK economy: -**

- The overall balance of risks to economic growth in the UK is to the downside. Indeed, the Bank of England projected two years of negative growth in their November Quarterly Monetary Policy Report.

**Downside risks to current forecasts for UK gilt yields and PWLB rates include: -**

- **Labour and supply shortages** prove more enduring and disruptive and depress economic activity (accepting that in the near-term this is also an upside risk to inflation and, thus, rising gilt yields).
- **The Bank of England** acts too quickly, or too far, over the next two years to raise Bank Rate and causes UK economic growth, and increases in inflation, to be weaker than we currently anticipate.
- **UK / EU trade arrangements** – if there was a major impact on trade flows and financial services due to complications or lack of co-operation in sorting out significant remaining issues.
- **Geopolitical risks**, for example in Ukraine/Russia, China/Taiwan/US, Iran, North Korea and Middle Eastern countries, which could lead to increasing safe-haven flows.

**Upside risks to current forecasts for UK gilt yields and PWLB rates: -**

- The **Bank of England is too slow** in its pace and strength of increases in Bank Rate and, therefore, allows inflationary pressures to build up too strongly and for a longer period within the UK economy, which then necessitates an even more rapid series of increases in Bank Rate faster than we currently expect.
- **The Government** acts too slowly to increase taxes and/or cut expenditure to balance the public finances, in the light of the cost-of-living squeeze.
- **The pound weakens** because of a lack of confidence in the UK Government's fiscal policies, resulting in investors pricing in a risk premium for holding UK sovereign debt.
- Longer term **US treasury yields** rise strongly, if inflation numbers disappoint on the upside, and pull gilt yields up higher than currently forecast.

**Borrowing advice:** Our long-term (beyond 10 years) forecast for Bank Rate stands at 2.5%. As all PWLB certainty rates are now above this level, borrowing strategies will need to be reviewed in that context. Better value can generally be obtained at the shorter end of the curve and short-dated fixed LA to LA monies should be considered. Temporary borrowing rates are likely, however, to remain near Bank Rate and may also

prove attractive whilst the market waits for inflation, and therein gilt yields, to drop back later in 2023.

Our suggested budgeted earnings rates for investments up to about three months' duration in each financial year are as follows: -

Average earnings in each year	
2022/23 (remainder)	3.95%
2023/24	4.40%
2024/25	3.30%
2025/26	2.60%
2026/27	2.50%
Years 6 to 10	2.80%
Years 10+	2.80%

As there are so many variables at this time, caution must be exercised in respect of all interest rate forecasts.

Our interest rate forecast for Bank Rate is in steps of 25 bps, whereas PWLB forecasts have been rounded to the nearest 10 bps and are central forecasts within bands of + / - 25 bps. Naturally, we continue to monitor events and will update our forecasts as and when appropriate.

## 5.2.2 Interest Rate Forecasts 2022 – 2025

Link Group Interest Rate View	08.11.22												
	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25
<b>BANK RATE</b>	3.50	4.25	4.50	4.50	4.50	4.00	3.75	3.50	3.25	3.00	2.75	2.50	2.50
3 month ave earnings	3.60	4.30	4.50	4.50	4.50	4.00	3.80	3.30	3.00	3.00	2.80	2.50	2.50
6 month ave earnings	4.20	4.50	4.60	4.50	4.20	4.10	3.90	3.40	3.10	3.00	2.90	2.60	2.60
12 month ave earnings	4.70	4.70	4.70	4.50	4.30	4.20	4.00	3.50	3.20	3.10	3.00	2.70	2.70
5 yr PWLB	4.30	4.30	4.20	4.10	4.00	3.90	3.80	3.60	3.50	3.40	3.30	3.20	3.10
10 yr PWLB	4.50	4.50	4.40	4.30	4.20	4.00	3.90	3.70	3.60	3.50	3.40	3.30	3.20
25 yr PWLB	4.70	4.70	4.60	4.50	4.40	4.30	4.10	4.00	3.90	3.70	3.60	3.50	3.50
50 yr PWLB	4.30	4.40	4.30	4.20	4.10	4.00	3.80	3.70	3.60	3.40	3.30	3.20	3.20

*PWLB forecasts are based on PWLB certainty rates.*

## 5.3 ECONOMIC BACKGROUND

Against a backdrop of stubborn inflationary pressures, the easing of Covid restrictions in most developed economies, the Russian invasion of Ukraine, and a range of different UK Government policies, it is no surprise that UK interest rates have been volatile right across the curve, from Bank Rate through to 50-year gilt yields, for all of 2022.

Market commentators' misplaced optimism around inflation has been the root cause of the rout in the bond markets with, for example, UK, EZ and US 10-year yields all rising by over 200bps since the turn of the year. The table below provides a snapshot of the conundrum facing central banks: inflation is elevated but labour markets are extraordinarily tight, making it an issue of fine judgment as to how far monetary policy needs to tighten.

	<b>UK</b>	<b>Eurozone</b>	<b>US</b>
Bank Rate	3.0%	1.50%	3.75% - 4.00%
GDP	-0.2%q/q Q3 (2.4%/y/y)	-0.2%q/q Q3 (2.1%/y/y)	2.6% Q3 Annualised
Inflation	11.1%/y/y (Oct)	10.0%/y/y (Nov)	7.7%/y/y (Oct)
Unemployment Rate	3.6% (Sep)	6.6% (Sep)	3.7% (Aug)

Q2 of 2022 saw UK GDP revised upwards to +0.2% q/q, but this was quickly reversed in the third quarter, albeit some of the fall in GDP can be placed at the foot of the extra Bank Holiday in the wake of the Queen's passing. Nevertheless, CPI inflation has picked up to what should be a peak reading of 11.1% in October, although with further increases in the gas and electricity price caps pencilled in for April 2023, and the cap potentially rising from an average of £2,500 to £3,000 per household, there is still a possibility that inflation will spike higher again before dropping back slowly through 2023.

The UK unemployment rate fell to a 48-year low of 3.6%, and this despite a net migration increase of c500k. The fact is that with many economic participants registered as long-term sick, the UK labour force actually shrunk by c£500k in the year to June. Without an increase in the labour force participation rate, it is hard to see how the UK economy will be able to grow its way to prosperity, and with average wage increases running at 5.5% - 6% the MPC will be concerned that wage inflation will prove just as sticky as major supply-side shocks to food and energy that have endured since Russia's invasion of Ukraine on 22nd February 2022.

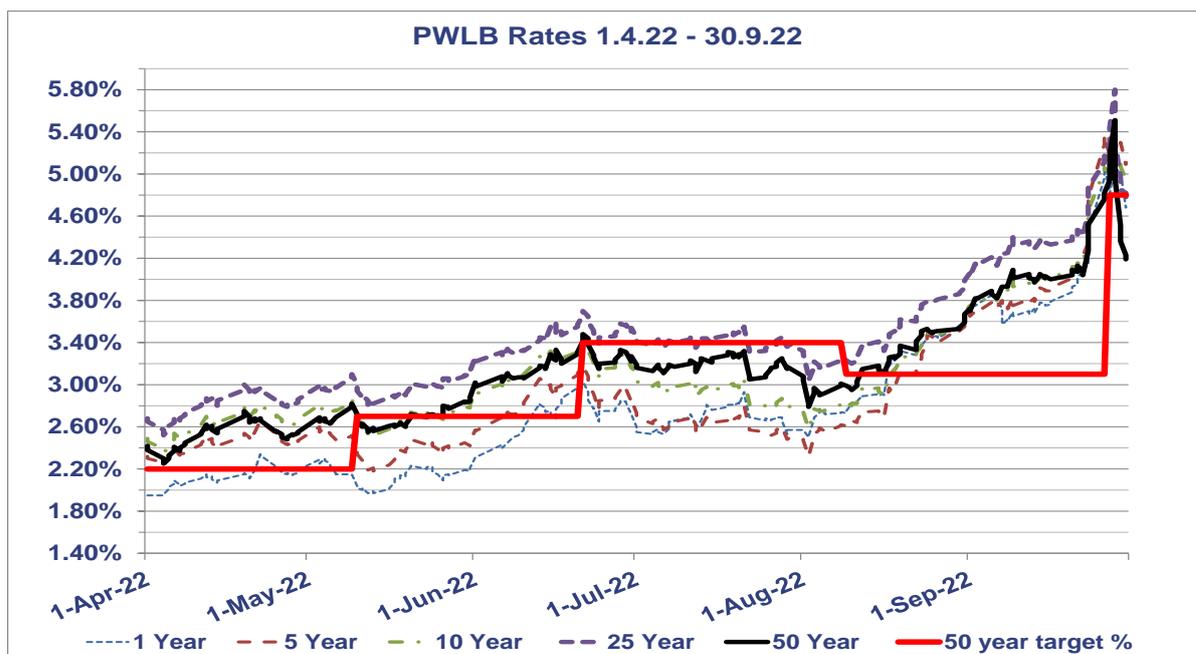
Throughout Q3 Bank Rate increased, finishing the quarter at 2.25% (an increase of 1%). Q4 has seen rates rise to 3% in November and the market expects Bank Rate to hit 4.5% by May 2023.

Following a Conservative Party leadership contest, Liz Truss became Prime Minister for a tumultuous seven weeks that ran through September and December. Put simply, the markets did not like the unfunded tax-cutting and heavy spending policies put forward by her Chancellor, Kwasi Kwarteng, and their reign lasted barely seven weeks before being replaced by Prime Minister Rishi Sunak and Chancellor Jeremy Hunt. Their Autumn Statement of 17<sup>th</sup> November gave rise to a net £55bn fiscal tightening, although much of the "heavy lifting" has been left for the next Parliament to deliver. However, the markets liked what they heard, and UK gilt yields have completely reversed the increases seen under the previous tenants of No10/11 Downing Street.

Globally, though, all the major economies are expected to struggle in the near term. The fall below 50 in the composite Purchasing Manager Indices for the UK, US, EZ and China all point to at least one if not more quarters of GDP contraction. In November, the MPC projected eight quarters of negative growth for the UK lasting throughout 2023 and 2024, but with Bank Rate set to peak at lower levels than previously priced in by the markets and the fiscal tightening deferred to some extent, it is not clear that things will be as bad as first anticipated by the Bank.

The £ has strengthened of late, recovering from a record low of \$1.035, on the Monday following the Truss government's "fiscal event", to \$1.20. Notwithstanding the £'s better run of late, 2023 is likely to see a housing correction of some magnitude as fixed-rate mortgages have moved above 5% and affordability has been squeezed despite proposed Stamp Duty cuts remaining in place.

In the table below, the rise in gilt yields, and therein PWLB rates, through the first half of 2022/23 is clear to see.



However, the peak in rates on 28<sup>th</sup> September as illustrated in the table covering April to September 2022 below, has been followed by the whole curve shifting ever lower. PWLB rates at the front end of the curve are generally over 1% lower now whilst the 50 years is over 1.75% lower.

	1 Year	5 Year	10 Year	25 Year	50 Year
<b>Low</b>	1.95%	2.18%	2.36%	2.52%	2.25%
<b>Date</b>	01/04/2022	13/05/2022	04/04/2022	04/04/2022	04/04/2022
<b>High</b>	5.11%	5.44%	5.35%	5.80%	5.51%
<b>Date</b>	28/09/2022	28/09/2022	28/09/2022	28/09/2022	28/09/2022
<b>Average</b>	2.81%	2.92%	3.13%	3.44%	3.17%
<b>Spread</b>	3.16%	3.26%	2.99%	3.28%	3.26%

After a shaky start to the year, the S&P 500 and FTSE 100 have climbed in recent weeks, albeit the former is still 17% down and the FTSE 2% up. The German DAX is 9% down for the year.

### **CENTRAL BANK CONCERNS – NOVEMBER 2022**

At the start of November, the Fed decided to push up US rates by 0.75% to a range of 3.75% - 4%, whilst the MPC followed a day later by raising Bank Rate from 2.25% to 3%, in line with market expectations. EZ rates have also increased to 1.5% with further tightening in the pipeline.

## 5.4 TREASURY MANAGEMENT PRACTICE (TMP1) – CREDIT AND COUNTERPARTY RISK MANAGEMENT

The DLUHC issued Investment Guidance in 2018, and this forms the structure of the Authority's policy below. These guidelines do not apply to either trust funds or pension funds, which operate under a different regulatory regime.

The key intention of the Guidance is to maintain the current requirement for authorities to invest prudently and that priority is given to security and liquidity before yield. In order to facilitate this objective, the guidance requires this Authority to have regard to the CIPFA publication Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes. This Authority will apply its principles to all investment activity.

In accordance with the Code, the Director of Finance has produced treasury management practices (TMPs). This part, TMP 1(1), covering investment counterparty policy requires approval each year.

**Annual investment strategy** - The key requirements of both the Code and the investment guidance are to set an Annual Investment Strategy, as part of its annual treasury strategy for the following year, covering the identification and approval of following:

- The strategy guidelines for choosing and placing investments, particularly non-specified investments.
- The principles to be used to determine the maximum periods for which funds can be committed.
- Specified investments that the Authority will use. These are high security and high liquidity investments in sterling and with a maturity of no more than a year.
- Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

The investment policy proposed for the Authority is:

**Strategy guidelines** – The main strategy guidelines are contained in the body of the Treasury Management Strategy Statement.

**Specified investments** – These investments are sterling investments of not more than one-year maturity, or those which could be for a longer period but where the Authority has the right to be repaid within 12 months if it wishes. They also include investments which were originally classed as being non-specified investments, but which would have been classified as specified investments apart from originally being for a period longer than 12 months once the remaining period to maturity falls to under 12 months.

These are considered low risk assets where the possibility of loss of principal or investment income is small. These would include sterling investments that would not be defined as capital expenditure with: -

- The UK Government (such as the Debt Management Account deposit facility, UK Treasury Bills or a Gilt with less than one year to maturity).
- Investments in Banks incorporated in the UK with a credit rating by Standard and Poor, Moody's and / or Fitch rating agencies of at least A/F1, A1 or P1, with a limit of £2m on the amount invested.
- Investments in Banks incorporated outside of the UK but entitled to accept deposits in the UK, per the Bank of England Prudential Regulation Authority list of banks, with

a credit rating by Standard and Poor's, Moody's and / or Fitch rating agencies of at least AA-/F1+/A1+/P1, with a limit of £2m on the amount invested.

- Pooled investment vehicles (such as Money Market Funds) that have been awarded a high credit rating by Standard and Poor's, Moody's and/ or Fitch rating agencies of AAA for Constant Net Asset Value (CNAV) funds and Low Volatility Net Asset Value (LVNAV) funds and AAA V1/S1 for Variable Net Asset Values (VNAV). \*
- Internal Investments up to 9 months up to agreed limits, in UK Building Societies with an asset basis of over £1 billion and rated by Standard and Poor's, Moody's and / or Fitch rating agencies. *(Non-rated UK Building Societies fall into the non-specified investments category).*
- Corporate bonds rated AAA of less than one-year duration.
- UK Local, Police and Fire Authorities with a limit of £3m on the amount invested with each.

*\* following the Money Market Fund Regulations of 21 July 2018, only public debt CNAV MMFs, (those investing 99.5% into government debt instruments etc.), remain as CNAVs. All other CNAVs converted to LVNAVs. VNAVs were unaffected by the changes.*

**Non-Specified Investments** are any other type of investment, (i.e. not defined as specified above), (but required by the Authority to be in sterling). *(Note: the operation of some building societies does not require a credit rating, although in every other respect the security of the society would match similarly sized societies with ratings. The Authority may make investments up to 9 months up to agreed limits in non-rated Building Societies with an asset basis of over £1 billion).*

The Authority amended its strategy in the 2018/19 Treasury Management Strategy Document to include Alternative Investment Instruments, such as Property Funds, in the Non-Specified Investment category. The use of these Alternative Investment Instruments can be deemed capital expenditure, and as such will be an application (spending) of capital resources. This Authority will seek guidance on the status of any such fund it may consider using. Appropriate due diligence will also be carried out before investment of this type is undertaken.

The Authority limits non-specified treasury investments, (excluding in building societies), to £20m of the value of its investment portfolio at the point of investment, with the maximum amount invested being in line with criteria outlined in the Table above.

### **Environmental, Social and Governance (ESG) Considerations**

The Authority acknowledges that ESG issues are increasingly significant but is aware that a consistent and developed approach to ESG, particularly for short-term cash deposits, is difficult, when there is currently a diversity of market approaches to ESG classification and analysis. Over time, this Authority will consider its credit and counterparty policies in light of ESG information and develop its own ESG investment policies and treasury management practices consistent with the organisation's own relevant policies. However, in the meantime, the use of mainstream credit rating agencies, many of whom incorporate ESG risks alongside more traditional financial risk metrics when assessing counterparty ratings, is an interim measure.

## 5.5 INTERNAL COUNTERPARTY LIST 2022/23 AS AT 31 December 2022

(Time limit 365 days unless specifically stated)

<b>UK High Street Banks</b>			
<i>UK or Irish bank with presence in UK and a short-term Fitch rating of F1 or higher</i>	<b>Long-Term Fitch Rating</b>	<b>Short-Term Fitch Rating</b>	<b>Max Investment</b> £
<b>Lloyds Banking Group</b>			
Lloyds Bank plc (RFB)	A+	F1	2,000,000
Lloyds Bank Corporate Markets plc (NRFB)	A+	F1	2,000,000
Bank of Scotland plc (RFB)	A+	F1	2,000,000
<b>Others</b>			
Barclays Bank UK plc (RFB)	A+	F1	2,000,000
Barclay Bank plc (NRFB)	A+	F1	2,000,000
Handelsbanken plc	AA	F1+	2,000,000
HSBC UK Bank plc (RFB)	AA-	F1+	2,000,000
HSBC Bank plc (NRFB)	AA-	F1+	2,000,000
National Westminster Bank plc (RFB)	A+	F1	2,000,000
Santander UK plc	A+	F1	2,000,000
The Royal Bank of Scotland plc (RFB)	A+	F1	2,000,000

**Building Societies** (time limit: up to 9 months). (\* Unrated building societies are non-specified investments).

		<b>Total Assets of Building Society</b> £000	<b>Assets &gt; £1 Billion</b>	<b>Max Investment</b> £
1	Nationwide	269,072,000	Yes	3,000,000
2	Yorkshire	66,125,300	Yes	3,000,000
3	Coventry	53,876,100	Yes	3,000,000
4	Skipton	27,230,100	Yes	3,000,000
5	Leeds	22,574,200	Yes	3,000,000
6	Principality	10,724,100	Yes	3,000,000
7	West Bromwich*	5,997,100	Yes	3,000,000
8	Newcastle*	4,887,800	Yes	2,000,000
9	Nottingham*	3,651,300	Yes	2,000,000
10	Cumberland*	2,882,043	Yes	2,000,000
11	National Counties*	2,332,022	Yes	2,000,000
12	Progressive*	1,820,633	Yes	2,000,000
13	Cambridge*	1,727,682	Yes	2,000,000
14	Monmouthshire*	1,488,508	Yes	2,000,000
15	Newbury*	1,401,152	Yes	2,000,000
16	Saffron*	1,296,313	Yes	2,000,000
17	Leek United*	1,179,076	Yes	2,000,000
18	Furniss*	1,128,358	Yes	2,000,000

<b>Non UK Banks</b>			
	<b>Long-Term Fitch Rating</b>	<b>Short-Term Fitch Rating</b>	<b>Max Investment £</b>
<b>Abu Dhabi (U.A.E)</b>			
First Abu Dhabi Bank PJSC	AA-	F1+	2,000,000
<b>Canada</b>			
Bank of Montreal	AA-	F1+	2,000,000
Bank of Nova Scotia	AA-	F1+	2,000,000
Canadian Imperial Bank of Commerce	AA-	F1+	2,000,000
Royal Bank of Canada	AA-	F1+	2,000,000
Toronto Dominion Bank	AA-	F1+	2,000,000
<b>Finland</b>			
Nordea Bank Abp	AA-	F1+	2,000,000
<b>Germany</b>			
DZ Bank AG (Deutsche Zentral-Genossenschaftsbank)	AA-	F1+	2,000,000
<b>Singapore</b>			
DBS Bank Ltd	AA-	F1+	2,000,000
Oversea Chinese Banking Corporation Ltd	AA-	F1+	2,000,000
United Overseas Bank Ltd	AA-	F1+	2,000,000
<b>U.S.A</b>			
Bank of New York Mellon, The	AA	F1+	2,000,000

<b>UK Government Debt Management Office</b>	
	<b>Max Investment £</b>
Debt Management Account Deposit Facility	Unlimited

<b>UK Local, Police and Fire Authorities</b>	
	<b>Max Investment £</b>
UK Local, Police and Fire Authorities	3,000,000

<b>Money Market Funds</b>		
	<b>Rating</b>	<b>Max Investment £</b>
CCLA - Public Sector Deposit Fund	AAAmmf	3,000,000
Goldman Sachs Sterling Liquid Reserves Fund	AAAmmf	3,000,000
Morgan Stanley Liquidity Funds - Sterling Liquidity Fund	AAAmmf	3,000,000

## 5.6 CURRENT PORTFOLIO POSITION

The overall treasury management portfolio as at 31 March 2022 and for the position as at 31 December 2022 are shown below for both borrowing and investments.

<b>Treasury Portfolio</b>				
	<b>31.3.22</b>	<b>31.3.22</b>	<b>31.12.22</b>	<b>31.12.22</b>
	<b>Actual</b>	<b>Actual</b>	<b>Actual</b>	<b>Actual</b>
	<b>£000</b>	<b>%</b>	<b>£000</b>	<b>%</b>
<b>Treasury investments</b>				
<b>Banks</b>				
Lloyds Bank Call Account	1,000	1.23%	1,000	1.16%
Lloyds Bank Bonus Call Account	1,000	1.23%	1,000	1.16%
Bank of Scotland Call Account	2,000	2.46%	2,000	2.32%
Santander Business Reserve Account	1,000	1.23%	1,000	1.16%
Santander Business Notice Account	1,000	1.23%	1,000	1.16%
<b>Building Societies</b>				
Progressive Building Society (unrated)	2,000	2.46%	0	0.00%
<b>Local Authorities</b>				
Thurrock Borough Council	3,000	3.68%	0	0.00%
<b>DMADF (HM Treasury)</b>	<b>30,650</b>	<b>37.64%</b>	<b>41,550</b>	<b>48.25%</b>
<b>Money Market Funds</b>				
CCLA - Public Sector Deposit Fund	3,000	3.68%	3,000	3.48%
Goldman Sachs - Sterling				
Liquid Reserves Fund	3,000	3.68%	2,000	2.32%
Morgan Stanley Sterling Liquidity Fund	3,000	3.68%	3,000	3.48%
<b>Total managed in house</b>	<b>50,650</b>	<b>62.20%</b>	<b>55,550</b>	<b>64.51%</b>
<b>Money Market Funds*</b>				
Payden Sterling Reserve Fund	15,331	18.83%	15,082	17.51%
Royal London Asset Management Short Term Fixed Income Fund	15,448	18.97%	15,481	17.98%
<b>Total managed externally</b>	<b>30,779</b>	<b>37.80%</b>	<b>30,563</b>	<b>35.49%</b>
<b>Total treasury investments</b>	<b>81,429</b>	<b>100.00%</b>	<b>86,113</b>	<b>100.00%</b>
<b>Treasury external borrowing</b>				
PWLB	(87,853)	100.00%	(86,931)	100.00%
<b>Total external borrowing</b>	<b>(87,853)</b>	<b>100.00%</b>	<b>(86,931)</b>	<b>100.00%</b>
<b>Net treasury investments/ (borrowing)</b>	<b>(6,424)</b>		<b>(818)</b>	
<i>* market value</i>				

## 5.7 THE TREASURY MANAGEMENT ROLE OF THE SECTION 151 OFFICER

### The S151 (responsible) officer

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- 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.

*The above is a list of specific responsibilities of the S151 officer in the 2021 Treasury Management Code. However, implicit in the recent changes in both codes, is a major extension of the functions of this role, especially in respect of non-financial investments, (which CIPFA has defined as being part of treasury management). The following are examples of the major extension in the functions of this role: -*

- 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.
- ensuring 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.
- 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 (*TM Code p54*): -
  - *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.*