

TREASURY MANAGEMENT STRATEGY STATEMENT

Introduction

1. The Chartered Institute of Public Finance and Accountancy's Code of Practice for Treasury Management in Public Services requires local authorities to determine their Treasury Management Strategy Statement (TMSS).
2. As per the requirements of the Prudential Code of Practice, 2011, the Authority has adopted the CIPFA Treasury Management Code and reaffirmed its adoption at its annual Budget meeting, most recently on 25 February 2013.
3. The purpose of this TMSS is, therefore, to approve the following:
 - i. Treasury Management Strategy for 2014/15
 - ii. Annual Investment Strategy for 2014/15

The approved Strategies will be implemented from the date of approval by the Council.

4. The Authority has borrowed substantial sums of money and has a significant amount invested and therefore, has potentially large exposures to financial risks including the loss of invested funds and the effect of changing interest rates. The successful identification, monitoring and control of risk is, therefore, central to the Authority's Treasury Management Strategy.

Capital Financing Requirement

5. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR). The CFR, together with usable reserves, are the core drivers of the Authority's Treasury Management activities.
6. At 31 December, 2013 the Authority's had £450m of long and short-term debt and £98m of investments. These are set out in further detail below.

Existing Investment & Debt Portfolio Position

Table 1

| | 30/12/2013 Actual Portfolio £m | 30/11/2013 Average Rate % |
|----------------------------------|--------------------------------------|---------------------------------|
| External Borrowing: | | |
| PWLB – Maturity | 288 | 5.01 |
| PWLB – EIP | 45 | 2.55 |
| Local Authorities | 21 | 0.43 |
| LOBO Loans | 96 | 4.73 |
| Total Gross External Debt | 450 | 4.49 |
| Investments: | | |
| Market Deposits | 91 | 0.66 |
| Money Market Funds | 7 | 0.43 |
| Total Investments | 98 | 0.65 |
| Net Debt | 352 | |

- 7 The movement in actual external debt and usable reserves combine to identify the Authority's borrowing requirement and potential investment strategy in the current and future years. The Authority's current strategy is to maintain borrowing at the lowest level possible unless interest rate prospects present a clear case for taking long term borrowing ahead of immediate requirements. This implies that the Council will continue borrow less than its CFR in the near future.

Interest Rate Forecast

- 8 Arlingclose (the Council's treasury advisers) and Capital Economics forecast that official UK Bank Rate will remain at 0.5% possibly until late 2016. Officers will monitor developments with the advice of Arlingclose but giving due regard to other published information.

Borrowing Strategy

- 9 Treasury management and borrowing strategies in particular continue to be influenced not only by the absolute level of borrowing rates but also the relationship between short and long term interest rates. This difference creates a "cost of carry" for any new longer term borrowing where the proceeds are temporarily held as investments because of the difference between what is paid on the borrowing and what is earned on the investment. The cost of carry is likely to be an issue for the foreseeable future. As borrowing is often for longer dated periods (anything up to 60 years) the cost of carry needs to be considered against a backdrop of uncertainty and affordability constraints in the Authority's wider financial position. Therefore, the Council does not intend to borrow in advance of need to fund its activities.
- 10 The Authority will adopt a flexible approach to any future long-term borrowing in consultation with its treasury management advisers, Arlingclose Ltd. The

following issues will be considered prior to undertaking any external borrowing:

- Affordability;
- Maturity profile of existing debt;
- Interest rate and refinancing risk;
- Borrowing source.

Sources of Borrowing and Portfolio Implications

- 11 In conjunction with advice from Arlingclose, the Authority will keep under review the following borrowing sources:
 - Internal balances
 - PWLB
 - Other local authorities
 - European Investment Bank
 - Leasing
 - Structured finance
 - Capital markets (stock issues, commercial paper and bills)
 - Commercial banks
- 12 The cost of carry has resulted in an emphasis on the use of internal resources and then increased use of shorter dated borrowing and repayment by Equal Instalments of Principal (EIP). This type of borrowing injects volatility into the debt portfolio in terms of interest rate risk but is counterbalanced by its affordability and alignment of borrowing costs with investment returns. It also maintains an element of flexibility to respond to possible future changes in the requirement to borrow. The Authority's exposure to shorter dated and variable rate borrowing is kept under regular review.
- 13 The Authority has £95.5m exposure to LOBO loans (Lender's Option Borrower's Option) of which £21.0m of these can be "called" within 2014/15. A LOBO is called when the Lender exercises its right to amend the interest rate on the loan, at which point the Borrower can accept the revised terms or reject them and repay the loan without penalty. LOBO loans present a potential refinancing risk to the Authority since the decision to call a LOBO is entirely at the lender's discretion which is compensated for by a lower interest rate being paid.
- 14 Any LOBOs called will be discussed with Arlingclose prior to acceptance of any revised terms. The default position will be the repayment of the LOBO without penalty i.e. the revised terms will not be accepted. It is unlikely that LOBOs will be called, unless and until interest rates start to rise, but officers are confident that if any are these could be repaid from resources available, or refinanced more cheaply.

Debt Rescheduling

- 15 The Authority's debt portfolio can be restructured by prematurely repaying loans and refinancing them on similar or different terms to achieve a reduction in risk and/or savings in interest costs.
- 16 The lower interest rate environment and changes in the rules regarding the premature repayment of PWLB loans have adversely affected the scope to undertake worthwhile debt restructuring although occasional opportunities arise. The rationale for undertaking any debt rescheduling or repayment would be one or more of the following:
- Reduce investment balances and credit exposure via debt repayment
 - Align long-term cash flow projections and debt levels
 - Savings in risk adjusted interest costs
 - Rebalancing the interest rate structure of the debt portfolio
 - Changing the maturity profile of the debt portfolio
- 17 Borrowing and rescheduling activity will be reported to the Executive and Council in the Annual Treasury Management Report and the mid year report.

Annual Investment Strategy

- 18 In accordance with investment guidance issued by the Department for Communities and Local Government (CLG), and best practice, this Authority's primary objective in relation to the investment of public funds remains the security of capital. The liquidity or accessibility of the Authority's investments is secondary, followed by the yield earned on investments.
- 19 The Authority and its advisors remain alert for signs of credit or market distress that might adversely affect the Authority.
- 20 Investments are categorised as Specified or Non-Specified within the investment guidance issued by the CLG. Specified investments are sterling denominated investments with a maximum maturity of one year. They are also of a high credit quality as determined by the Authority and are not investments that needed to be accounted for as capital expenditure. Non-specified investments are, effectively, everything else. Investments for more than a year remain non-specified until they mature.
- 21 The types of investments that will be used by the Authority and whether they are specified or non-specified are as follows:

Table 2: Specified and Non-Specified Investments

| Investment | Specified | Non-Specified |
|--|--------------------------|--------------------------|
| Term deposits with banks and building societies | <input type="checkbox"/> | <input type="checkbox"/> |
| Term deposits with other UK local authorities | <input type="checkbox"/> | <input type="checkbox"/> |
| Investments with Registered Providers | <input type="checkbox"/> | <input type="checkbox"/> |
| Certificates of deposit with banks and building Societies | <input type="checkbox"/> | <input type="checkbox"/> |
| Gilts | <input type="checkbox"/> | <input type="checkbox"/> |
| Treasury Bills (T-Bills) | <input type="checkbox"/> | <input type="checkbox"/> |
| Bonds issued by Multilateral Development Banks | <input type="checkbox"/> | <input type="checkbox"/> |
| Local Authority Bills | <input type="checkbox"/> | <input type="checkbox"/> |
| Commercial Paper | <input type="checkbox"/> | <input type="checkbox"/> |
| Corporate Bonds | <input type="checkbox"/> | <input type="checkbox"/> |
| AAA-Rated Money Market Funds | <input type="checkbox"/> | <input type="checkbox"/> |
| Other Money Market Funds and Collective Investment Schemes | <input type="checkbox"/> | <input type="checkbox"/> |
| Debt Management Account Deposit Facility | <input type="checkbox"/> | <input type="checkbox"/> |

- 22 Registered Providers (Housing Associations and Registered Social Landlords) have been included within specified and non-specified investments for 2014/15. Any investments with Registered Providers will be analysed on an individual basis and discussed with Arlingclose prior to investing.
- 23 The minimum credit rating for non-UK sovereigns is AA+ (or equivalent). For specified investments the minimum long term rating for counterparties is A- (or equivalent). Within these criteria the Chief Finance Officer (CFO) will have discretion to accept or reject individual institutions as counterparties on the basis of any information which may become available. The countries and institutions that currently meet the criteria for investments are included in Annex A. The Council uses the lowest rating quoted by Fitch, Standard and Poor or Moody, as recommended by CIPFA.
- 24 Any institution will be suspended or removed should any of the factors identified above give rise to concern, and caution will be paramount in reaching any investment decision regardless of the counterparty or the circumstances. Credit ratings are monitored continually by the Authority, using the advice of Arlingclose on ratings changes, and action taken as appropriate.
- 25 The Authority banks with National Westminster Bank (Natwest) and, at the current time, it meets the Authority's minimum credit criteria.

Investment Strategy

- 26 With short term interest rates expected to remain low for some time, an investment strategy will typically result in a lengthening of investment periods, where cash flow permits, in order to lock in higher rates of acceptable risk adjusted returns.
- 27 In order to diversify a portfolio largely invested in cash, investments will be placed with a number of approved counterparties over a range of maturity periods. Maximum investment levels with each counterparty will be set by the Chief Finance Officer to ensure that prudent diversification is achieved.
- 28 Money market funds (MMFs) will be utilised but good treasury management practice prevails, and whilst MMFs provide good diversification, the Authority will also seek to mitigate operational risk by using at least two MMFs where practical. The Authority will also restrict its exposure to MMFs with lower levels of funds under management and will not exceed 0.5% of the net asset value of the MMF. In addition, each Fund will be limited to a maximum deposit of £10m and no more than half the Council's deposits will be placed with MMFs.
- 29 The investment strategy will provide flexibility to invest cash for periods of up to 370 days in order to access higher investment returns, although lending to UK local authorities can be for up to 5 years. The upper limit for lending beyond a year is £20m. In practice, lending for more than one year will be only to institutions of the highest credit quality and at rates which justify the liquidity risk involved.
- 30 Collective Investment Schemes (Pooled Funds):
The Authority has evaluated the use of Pooled Funds and determined the appropriateness of their use within the investment portfolio. Pooled funds enable the Authority to diversify the assets and the underlying risk in the investment portfolio and provide the potential for enhanced returns. Investments in pooled funds will be undertaken with advice from Arlingclose. The Authority currently has no investments in Pooled Funds.
- 31 Investment Policy:
Treasury Management in the Public Services: Code of Practice (the Code) was updated in November 2011, with a greater focus on risk management and significance of capital security as the Council's primary objective in relation to investments.
- 32 The Council will create and maintain, as the cornerstones for 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 (TMPs), setting out the manner in which the Council will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.
 - The Policy Statement was approved last year and is not being revised.

Policy on Use of Financial Derivatives

- 33 The Authority will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Authority is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be taken into account when determining the overall level of risk. Embedded derivatives will not be subject to this policy. Where schemes contain an embedded derivative, it will be subject to evaluation as part of the appraisal of the particular scheme.
- 34 Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria. The current value of any amount due from a derivative counterparty will count against the counterparty credit limit and any relevant foreign country limit.
- 35 The Authority will only use derivatives after seeking expertise, receiving a legal opinion and ensuring officers have the appropriate training for their use.

Policy on apportioning Housing Revenue Account HRA

- 36 Central Government completed its reform of the HRA Subsidy system at the end of 2011/12. Local authorities are required to recharge interest expenditure and income attributable to the HRA in a way which is fair to the HRA without detriment to the General Fund. The guidance is very general, so the Council is required to adopt a policy that will set out how interest charges attributable to the HRA will be determined. The CIPFA Code recommends that local authorities outline this policy in their TMSS.
- 37 As of 1 April 2012, the Council notionally split each of its existing long-term loans into General Fund and HRA pools. Individual loans or parts of loans have been allocated to the HRA, on the basis of achieving the same long term rate as that which applied to the General Fund at the self financing date. In the future, new long-term borrowing will be assigned in its entirety to one pool or the other, allocating the costs and benefits to each accordingly.
- 38 Differences between the value of the HRA loans pool and the HRA's underlying need to borrow will result in a notional element of internal borrowing. This balance will be assessed over the year and interest charged to the HRA at an appropriate rate for short term borrowing. The HRA will also hold reserves and balances which will be invested with the Council, and interest will be paid on identified balances at a rate which recognises that any investment risk is borne by the General Fund.

Monitoring and Reporting on the Treasury Outturn and Prudential Indicators

- 39 The CFO will report to the Executive and Full Council on treasury management as follows:
- Annually, against the strategy approved for the year.
 - A mid-year report on the implementation of strategy and main features of the year's activity to date.

Training

- 40 CIPFA's Code of Practice requires the CFO to ensure that all members with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities. Arlingclose delivered a training session for members on 2 July 2013. Staff regularly attend training courses, seminars and conferences provided by Arlingclose, CIPFA and others. Relevant staff are also encouraged to study for professional qualifications from CIPFA and other appropriate organisations.

Treasury Management Advisers

- 41 The Authority uses Arlingclose as Treasury Management Advisers and receives the following services:
- Credit advice
 - Investment advice
 - Technical advice
 - Economic & interest rate forecasts
 - Workshops and training events
 - HRA support
 - Other matters as required

The Authority maintains the quality of the service with its advisers by holding quarterly meetings and tendering periodically.

Annex A

ANNUAL INVESTMENT STRATEGY 2014/15

**List of institutions which meet the Council's credit worthiness criteria
as at 1 February 2014:**

| Jurisdiction | Counterparty |
|---------------------|-----------------------------------|
| UK | Lloyds TSB/ Bank of Scotland |
| UK | Barclays Bank plc |
| UK | Close Brothers Ltd |
| UK | Goldman Sachs International |
| UK | HSBC Bank plc |
| UK | Leeds Building Society |
| UK | Nationwide Building Society |
| UK | National Westminster Bank/RBS plc |
| UK | Santander UK plc |
| UK | Standard Chartered Bank |
| Australia | Australia and N Z Banking Group |
| Australia | Commonwealth Bank of Australia |
| Australia | National Australia Bank Ltd |
| Australia | Westpac Banking Corp |
| Canada | Bank of Montreal |
| Canada | Bank of Nova Scotia |
| Canada | Canadian Imperial Bk of Commerce |
| Canada | Royal Bank of Canada |
| Canada | Toronto-Dominion Bank |
| Finland | Nordea Bank |
| Finland | Pohjola Bank plc |
| Germany | Deutsche Bank AG |
| Germany | Landesbank Hessen-Thuringen |
| Netherlands | Bank Nederlandse Gemeenten |
| Netherlands | Cooperatieve Centrale Raiffesen |
| Netherlands | ING Bank NV |
| Singapore | DBS Bank Ltd |
| Singapore | Oversea-Chinese Banking Corp |

Appendix K

| | |
|-------------|--------------------------|
| Singapore | United Overseas Bank Ltd |
| Sweden | Svenska Handelsbanken |
| Switzerland | Credit Suisse AG |
| US | JPMorgan Chase Bank NA |

The list above represents the institutions which meet the criteria at the time of preparation of the strategy. The Authority's Chief Finance Officer may introduce new names which meet the criteria from time to time and may adopt more restrictive limits on maturity or value as seems prudent. The Council may also lend any amount to any UK national or local government body for up to 5 years.

An operational list of institutions which are approved to take deposits from the Council will be prepared and circulated to dealing and approving Officers from time to time.

Group Limits - for institutions within a banking group, the authority may lend the full limit to a single bank within that group, but may not exceed the limit for all group members.

Annex B

Non-Specified Investments

Instrument

Call accounts, term deposits and Certificates of Deposit (CDs) with banks, building societies and local authorities which do not meet the specified investment criteria (on advice from Arlingclose)

Deposits with registered providers

Gilts

Bonds issued by multilateral development banks

Sterling denominated bonds by non-UK sovereign governments

Money Market Funds rated below AAA and Collective Investment Schemes

Corporate and debt instruments issued by corporate bodies

Collective Investment Schemes (pooled funds) which do not meet the definition of collective investment schemes in SI 2004 No 534 or SI 2007 No 573. These would be capital expenditure.

The Authority will hold up to a maximum of £30m in non-specified investments at any time, which may all be in one category subject to individual counterparty limits.