AUDIT AND STANDARDS COMMITTEE

7 FEBRUARY 2017

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Report Title	TREASURY MANAGEMENT STRATEGY, ANNUAL INVESTMENT STRATEGY AND MINIMUM REVENUE PROVISION POLICY STATEMENT 2017/18						
Purpose of Report	This report outlines the Council's prudential indicators for 2017/18 – 2019/20 and sets out the treasury strategy for this period. It fulfils three key reports required by the Local Government Act 2003:						
	 reporting prudential indicators required by the CIPFA Prudential Code for Capital Finance in Local Authorities; a treasury management strategy in accordance with the CIPFA Code of Practice on Treasury Management; an investment strategy in accordance with the DCLG investment guidance. 						
	It also fulfils the statutory duty to approve a minimum revenue policy (MRP) statement for 2017/18.						
Decision(s)	The Audit and Standards Committee RECOMMEND that Council:						
	1. adopt the prudential indicators and limits for 2017/18 to 2019/20;						
	2. approve the treasury management strategy 2017/18, and the treasury prudential indicators;						
	3. approve the investment strategy 2017/18, and the detailed criteria for specified and non-specified investments; and						
	4. approve the Minimum Revenue Policy Statement 2017/18.						
	The Audit and Standards Committee gives the Accountancy Manager delegated authority to amend Table 1 and other interrelated tables should Council on 9 February approve an amended capital programme to that assumed in this report.						

Consultation and	Capita Asset Services (CAS)
Feedback Financial Implications and Risk Assessment	This report sets out the expected activities of the Council's Treasury function for 2017/18 and recommends the investment instruments that are available to the council and the limits on these investments. The report also sets out the Council's borrowing strategy, limits and associated policies. The Council has £112.464m of borrowing (including internal borrowing) and the Council's capital spending plans increase the borrowing to £118.235m by 31 March 2020. It is worth noting that the Council's proposed capital programme proposes a further £4.150m of borrowing in 2020/21, but this is not reflected in the prudential indicators in this report due to the differing timescales covered by the Treasury Management Strategy and the Capital Programme. It will be important to consider carefully, in conjunction with our Treasury Management advisers, the optimum timing and nature of any new borrowing to minimise the cost to the Council. An under borrowing position has been assumed in the short term to minimise the impact of the difference between borrowing and investment rates. This position will be kept under review in conjunction with our Treasury Management advisers as the council's balances are utilised over the medium term.
Legal Implications	The Council makes investments during the year as part of its management of treasury balances. The investment strategy sets out the Council's investment priorities and the criteria used to make those investments to ensure security of capital, liquidity and a return on investment. The Treasury Management Strategy is designed to protect the Council's finances through limiting exposure to risk. David Stanley, Accountancy Manager Tel: 01453 754100 Email: david.stanley@stroud.gov.uk This report has not been submitted to Legal Services prior to publication. The Legal Services Manager has advised that she will consider the report and update the Committee if there are any significant Legal Implications.
Report Author	significant Legal Implications. Graham Bailey, Principal Accountant Tel: 01453 754133 E-mail: graham.bailey@stroud.gov.uk

Chair of Committee	Councillor Nigel Studdert-Kennedy									
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Options	Full Council is required to adopt the prudential									
	indicators and approve the annual treasury									
	management strategy. These are largely determined									
	by the Council's revenue and capital budget decisions when setting the 2017/18 Council Tax, Housing rent levels and the capital programme. Quarterly, half-yearly and annual Treasury Management reports of actual compared with estimated prudential indicators for 2017/18.									
	Housing rent levels and the capital programme.									
Performance										
Management Follow										
Up	estimated prudential indicators for 2017/18.									
	Any breaches of the Prudential Code will be reported to the Audit and Standards Committee. A breach of the Authorised Borrowing Limit would require immediate investigation and reporting to Council.									
	Council.									
Background Papers	Treasury Management Policy Statement									
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Appendices	Treasury Management Practices - Main Principles Treasury Management Practices - Schedules The Prudential Code (2011) Treasury Management in the Public Services Guidance Notes for Local Authorities (2011) Treasury Management in the Public Services Code of Practice and Cross-Sectoral Guidance Notes (2011). A. Investments at 16 December 2016									

Discussion

- 1. Under the Local Government Act 2003 (the Act) and supporting regulations the Council is required to "have regard to" the Chartered Institute of Public Finance and Accountancy (CIPFA) Prudential Code and the CIPFA Treasury Management Code of Practice to set Prudential and Treasury Indicators for the next three years to ensure that the Council's capital investment plans are affordable, prudent and sustainable.
- 2. Council is required to approve an Annual Treasury Management Strategy Statement for borrowing, and an Investment Strategy which sets out the Council's policies for managing its investments and for giving priority to security and liquidity of investments.

- 3. Also, there is a statutory duty to approve a Minimum Revenue Provision (MRP) Policy Statement for the year and this is set out in paragraphs 2.6 2.10 of this report.
- 4. CIPFA Code of Practice on Treasury Management (revised November 2011) as adopted by this Council on 21 January 2010 requires the Council to maintain a Treasury Management Manual, which is reviewed annually. This manual is a record of internal procedures and operational guidance, as such it is not subject to approval by Members. The manual incorporates the following documentation relating to Treasury management:
 - Treasury Management Policy Statement. This is reviewed annually.
 - Treasury Management Practices (TMP) Main Principles. There are 12 practices which set out the manner in which this Council will seek to achieve its treasury management policies and objectives and how it will manage and control those activities. These are reviewed annually.
 - <u>Treasury Management Practices Schedules</u>. These schedules set out the details of how the TMPs are put into effect by this Council. This document is revised annually to include the latest detailed procedural documents.
 - Counterparty Lending List and lending criteria. The list used by the Council is provided by Capita Asset Services (CAS), the Council's treasury advisors. A new list is provided weekly, and there are daily updates by email of any changes to ratings.

5. Other CIPFA requirements are:

- a Mid-year Review Report and an Annual Report covering activities during the previous year;
- delegation by the Council of responsibilities for implementing and monitoring treasury management policies and practices and for the execution and administration of treasury management decisions. At this Council, delegation is to the Accountancy Manager, the Council's Section 151 officer:
- delegation by the Council of the role of scrutiny of treasury management reports and strategy to a specific named body. For this Council the delegated body is the Audit and Standards Committee.

Treasury Management Strategy Statement, Annual Investment Strategy and Minimum Revenue Provision Statement 2017/18

1. INTRODUCTION

- 1.1 The Act and supporting regulations require the Council to 'have regard to' the CIPFA Prudential Code and to set Prudential Indicators for the next three years to ensure that the Council's capital investment plans are affordable, prudent and sustainable.
- 1.2 The Act therefore requires the Council to set out its treasury strategy for borrowing and to prepare an Annual Investment Strategy (as required by Investment Guidance issued subsequent to the Act). This sets out the Council's policies for managing its investments and for giving priority to the security and liquidity of those investments.
- 1.3 The 2017/18 strategy for the following aspects of the treasury management function is based upon the treasury officers' views on interest rates, supplemented with market forecasts provided by the Council's treasury advisor, CAS. The strategy covers:
 - limits in force to mitigate the Council's treasury risk;
 - Prudential Indicators;
 - current treasury position;
 - borrowing requirement;
 - prospects for interest rates;
 - borrowing strategy;
 - policy on borrowing in advance of need;
 - investment strategy;
 - creditworthiness policy;
 - policy on use of external service providers:
 - Minimum Revenue Provision (MRP) statement;
 - treasury management scheme of delegation and section 151 role;
 - miscellaneous treasury issues.
- 1.4 It is a statutory requirement under Section 33 of the Local Government Finance Act 1992, for the Council to produce a balanced budget. In particular, Section 32 requires a local authority to calculate its budget requirement for each financial year to include the revenue costs that flow from capital financing decisions. This means that increases in capital expenditure must be limited to a level whereby increases in charges to revenue from:
 - increases in interest charges and minimum revenue provision caused by increased borrowing to finance additional capital expenditure, and
 - any increases in running costs from new capital projects are limited to a level which is affordable for the foreseeable future.

2. CAPITAL PRUDENTIAL INDICATORS FOR 2017/18 TO 2019/20

- 2.1 Capital expenditure plans are a key driver of treasury management activity. There are prudential indicators that focus on the Council's capital spending plans.
- 2.2 The first prudential indicator is a summary of the Council's capital expenditure plans, shown in Table 1.

Table 1: Capital Expenditure

Capital Expenditure	2015/16 £000 Actual	2016/17 £000 Estimate	2017/18 £000 Estimate	2018/19 £000 Estimate	2019/20 £000 Estimate
Community Services	1,287	1,583	389	250	250
Environment	836	1,560	30	320	12
Strategy & Resources	1,262	7,561	2,280	2,310	1,400
Budget Proposals	-	-	1,250	2,430	4,950
General Fund	3,385	10,704	3,949	5,310	6,612
HRA	18,080	12,413	12,290	7,171	6,574
Total	21,465	23,117	16,239	12,481	13,186

2.3 Any shortfall of resources to finance the capital programme results in a borrowing need as set out in Table 2 below.

Table 2: Capital Financing

Capital Expenditure	2015/16 £000 Actual	2016/17 £000 Estimate	2017/18 £000 Estimate	2018/19 £000 Estimate	2019/20 £000 Estimate
General Fund	3,385	10,704	3,949	5,310	6,612
HRA	18,080	12,413	12,290	7,171	6,574
Total	21,465	23,117	16,239	12,481	13,186
Financed by:					
Capital receipts	1,705	2,495	1,734	1,615	1,700
Capital grants	1,294	1,469	1,025	1,799	250
Capital reserves	1,220	2,477	860	1,745	2,012
Revenue	11,590	5,417	10,370	5,472	4,874
Net Financing Need for the year	5,656	11,259	2,250	1,850	4,350

2.4 The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic capital expenditure which has not yet been financed from either revenue or capital resources. It is the measure of the Council's underlying borrowing need. Any newly planned unfinanced capital expenditure will increase the CFR.

2.5 The Council is asked to approve the CFR projections below:

Table 3: The Council's borrowing need (Capital Financing Requirement)

Capital Financing Requirement	2015/16 £000 Actual	2016/17 £000 Estimate	2017/18 £000 Estimate	2018/19 £000 Estimate	2019/20 £000 Estimate
CFR - General Fund	9,225	16,722	18,242	19,142	22,493
CFR - HRA	91,980	95,742	95,742	95,742	95,742
Total CFR	101,205	112,464	113,984	114,884	118,235
Movement in CFR	5,656	11,259	1,520	900	3,350

Movement in CFR represented by							
Net financing need for the year	5,656	11,259	2,250	1,850	4,350		
Less MRP / VRP and other financing movements	-	-	-730	-950	-1,000		
Movement in CFR	5,656	11,259	1,520	900	3,350		

Minimum Revenue Provision (MRP) Policy Statement 2017/18

- 2.6 The Council's MRP policy statement for 2017/18 is in accordance with the main recommendations contained within the guidance issued by the Secretary of State under section 21(1A) of the Local Government Act 2003. MRP is only chargeable on General Fund outstanding capital liabilities.
- 2.7 An MRP charge is not currently required for the HRA. However, following on from the introduction of HRA self-financing the HRA is required to charge depreciation on its assets for financial years commencing April 2017. Therefore depreciation will be a real cost to the HRA from financial year 2017/18. The regulations have allowed for the Major Repairs Allowance to be used as a proxy for depreciation until 31 March 2017.
- 2.8 The government has protected the General Fund from any adverse MRP liability arising from HRA self-financing borrowing. Consequently, as there was no General Fund MRP liability prior to HRA Self-Financing, there has been no General Fund MRP liability until 2017/18. However, in 2017/18 recent borrowing in respect of The Pulse fitness extension, and borrowing for vehicles, premises and equipment for the Mult-Service contract with Ubico has generated an MRP liability for 2017/18 of £730k. Other new General Fund capital plans will result in an increasing MRP charge to provide for the repayment of debt in future years.
- 2.9 MRP will be charged under Option 3 of the DCLG guidance. Option 3 is an MRP charge over a time period reasonably commensurate with the estimated useful life of a new asset. The Council is funding £1m of expenditure on The Pulse fitness extension by borrowing, also there is £8.4m of borrowing in respect of the Multi-Service Contract that

- commenced in July 2016, and £1.75m for Littlecombe Business Units. A grant in relation to Brimscombe Port redevelopment of £2m would become repayable unless certain conditions are met, in which case it would also effectively become borrowing. Under Option 3, MRP will be chargeable in the year following the completion of the asset. So MRP will commence in 2017/18 and its duration will be linked to the asset funded and so will last from 5 to 30 years.
- 2.10 The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year-end balances for each resource and anticipated day-to-day cash flow balances.

Table 4: Core Funds and Expected Investments

	2015/16	2016/17	2017/18	2018/19	2019/20
Year end resources	£m	£m	£m	£m	£m
	Actual	Estimate	Estimate	Estimate	Estimate
Fund balances / reserves	22.268	21.172	16.154	14.069	10.530
Capital receipts	2.891	0.872	2.558	4.118	2.443
Provisions	0.734	0.734	0.734	0.734	0.734
Other	-1.877	0.500	0.500	0.500	0.500
Total Core funds	24.016	23.278	19.946	19.421	14.207
Working capital	1.696	0.500	0.500	0.500	0.500
Under (-) / over borrowing	3.512	-5.747	-6.267	-5.167	-5.518
Expected investments	29.224	18.031	14.179	14.754	9.189

Affordability of capital plans prudential indicators

- 2.11 Prudential indicators are required to assess the affordability of capital expenditure plans. These provide an estimate of the impact of capital investment plans on the Council's overall finances. The Council is asked to approve the indicators shown in tables 5, 6 and 7.
- 2.12 The indicator shown in table 5 shows the cost of capital expenditure plans as a ratio of the net revenue stream.

Table 5: Ratio of financing costs to net revenue stream

	2015/16 Actual	2016/17 Estimate	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate
Non-HRA	-2.14%	-0.76%	-0.13%	0.33%	1.29%
HRA	15.06%	15.65%	16.05%	16.29%	16.56%

2.13 The indicator shown in Table 6 shows estimates of the revenue costs arising from proposed changes to the 2016-17 to 2019-20 capital

programme recommended in this year's 'The Council's Capital Programme 2017-21' report compared to the Council's pre-existing approved commitments and plans.

Table 6: Incremental impact of capital investment decisions on council tax

	2015/16	2016/17	2017/18	2018/19	2019/20
	Actual	Estimate	Estimate	Estimate	Estimate
Council Tax - Band D	-£0.36	£0.00	£1.02	£0.41	£0.75

2.14 Similar to the council tax calculation, Table 7 indicator identifies the cost of proposed changes in the housing capital programme recommended in this budget report compared to the Council's existing commitments and current plans, expressed as a discrete impact on weekly rent levels.

Table 7: Estimates of the incremental impact of capital investment

decisions on housing rent levels

	2015/16	2016/17	2017/18	2018/19	2019/20
	Actual	Estimate	Estimate	Estimate	Estimate
Weekly Housing Rents	£0.01	-£0.09	£0.05	£0.00	-£0.01

3. BORROWING

- 3.1 Amongst the objectives of the treasury management function are ensuring that the Council's cash is managed in accordance with relevant professional codes and that sufficient cash is available at the right times to facilitate revenue and capital spending plans. Capital expenditure plans as set out in section 2 indicate if borrowing is required.
- 3.2 Table 8 shows the actual external debt (the treasury management operations), compared against the underlying capital borrowing need (the Capital Financing Requirement CFR), highlighting any over or under borrowing.

Table 8: Gross Debt compared with Capital Financing Requirement

(CFR)

or rej								
	2015/16 £m	2016/17 £m	2017/18 £m	2018/19 £m	2019/20 £m			
	Actual	Estimate	Estimate	Estimate	Estimate			
External Debt								
Debt at 1 April	95.717	104.717	106.717	107.717	109.717			
Expected change in debt	9.000	2.000	1.000	2.000	3.000			
Other long term liabilities at 1 Apr	-	-	-	-	-			
Actual Gross Debt at 31 March	104.717	106.717	107.717	109.717	112.717			
Capital Financing Requirement	101.205	112.464	113.984	114.884	118.235			
Under / (-) over borrowing	-3.512	5.747	6.267	5.167	5.518			

- 3.3 Within the prudential indicators, there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council 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 2017/18 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not for revenue purposes.
- 3.4 The Accountancy Manager reports that the Council complied with this prudential indicator in the current year and does not expect any breaches up to and including financial year 2019-20. This view takes into account current commitments, existing plans, and the proposals in this budget report.
- 3.5 There are two Treasury indicators set which limit external debt. The operational boundary is the limit that external debt should not normally exceed. If external debt were to exceed this figure then it should prompt an internal investigation to establish the reasons why the breach had occurred.

Table 9: Operational Boundary

Operational Boundary	2016/17 £m Estimate	2017/18 £m Estimate	2018/19 £m Estimate	2019/20 £m Estimate
Debt	118	120	123	127
Other Long Term Liabilities	-	-	-	-
Total	118	120	123	127

- 3.6 The Authorised Limit is set or revised by full Council, and must not be exceeded. It represents the level of debt that is unsustainable in the longer term. It is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control local government borrowing in total or for specific councils. This power has not been used to date.
- 3.7 The Council is asked to approve the following Authorised Limit:

Table 10: Authorised Limit for External Debt

Authorised Limit	2016/17 £m Estimate	2017/18 £m Estimate	2018/19 £m Estimate	2019/20 £m Estimate
Debt	126	128	131	135
Other Long Term Liabilities	-	-	-	-
Total	126	128	131	135

3.8 A separate control on the Council's borrowing is a limit on the maximum HRA CFR introduced as part of HRA self-financing. This Council had some headroom to borrow over and above the self-financing settlement amount. It is forecast that the borrowing headroom is used up by 31 March 2017. No further borrowing by the HRA is permitted. This is set out in the next table:

Table 11: HRA Debt Limit

HRA Debt Limit	2015/16 £m Actual	2016/17 £m Estimate	2017/18 £m Estimate	2018/19 £m Estimate	2019/20 £m Estimate
Actual HRA CFR	93.980	95.742	95.742	95.742	95.742
Limit	95.742	95.742	95.742	95.742	95.742
Headroom	1.762	-	-	-	-

3.9 CAS are treasury advisers to the Council and part of their service is to assist the Council to formulate a view on interest rates. The following table gives the latest CAS forecast as at November 2016.

Table 12: Interest Rate Forecast

Month	Bank Rate	PWLB Borrowing Rates			
		5 year	25 year	50 year	
Mar-17	0.25	1.60	2.90	2.70	
Jun-17	0.25	1.60	2.90	2.70	
Sep-17	0.25	1.60	2.90	2.70	
Dec-17	0.25	1.60	3.00	2.80	
Mar-18	0.25	1.70	3.00	2.80	
Jun-18	0.25	1.70	3.00	2.80	
Sep-18	0.25	1.70	3.10	2.90	
Dec-18	0.25	1.80	3.10	2.90	
Mar-19	0.25	1.80	3.20	3.00	
Jun-19	0.50	1.90	3.20	3.00	

Borrowing Strategy

- 3.10 Currently the Council has £106.7m of borrowing, compared with a Capital Financing Requirement (CFR) of £112.464m. This means that the capital borrowing need (the CFR), is greater than loan debt by £5.764m. The Council borrowed £1m of PWLB at a fixed rate of 2.51% for 50 years on 14 June 2016 and £1m on 21 June 2016 for 47 years at a fixed rate of 2.65% to take advantage of particularly low rates to fund part of the HRA borrowing requirement.
- 3.11 There is a limit on HRA borrowing set by the Government in the Localism Act 2011 known as the HRA debt cap. The Council's HRA debt cap is £95.742m. This cap is the absolute limit for HRA borrowing under the Prudential Code, even if the Council considers further borrowing is affordable by the HRA. The 2016/17 HRA CFR is £95.742m, which means a borrowing 'headroom' has been fully utilised measured against the cap, as shown by table 11.
- 3.12 HRA capital plans can include no further borrowing in 2017/18 and subsequent years, whilst General Fund capital plans include borrowing of £8.45m up to 2019/20. The Accountancy Manager will decide on the length and type of borrowing, as well as the optimum time to borrow in consultation with CAS, and take into account the latest projections for interest rates and other relevant factors including any benefits arising from internal borrowing.
- 3.13 There is a £1m PWLB loan due for repayment in Mar 2018, and a £2m loan from Hampshire County Council due for repayment in February 2019. Given the short-term financial pressures on the HRA it is likely that these loans will be refinanced.

3.14 In the current year, an internal borrowing position in excess of £5m has been assumed to reduce the financial impact of the differential between borrowing and investment interest rates. This position is projected as continuing through the period to 2019/20. Although, with the MTFP forecasting the running down of balances, and possible future changes in interest rate forecasts the Accountancy Manager will keep this under review, and adjust the strategy as necessary in consultation with our Treasury adviser CAS.

Treasury management limits on activity

- 3.15 The purpose of treasury management limits are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs or improve performance. The indicators are:
 - Upper limits on variable interest rate exposure. This identifies a maximum limit for variable interest rates based upon the debt position net of investments;
 - Upper limits on fixed interest rate exposure. This is similar to the previous indicator and covers a maximum limit on fixed interest rates;
 - Maturity structure of borrowing. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits
- 3.16 The Council is asked to approve the following treasury indicators and limits:

Table 13: Limits on interest rate exposure

Interest Rate Exposures	2015/16 Upper	2016/17 Upper	2017/18 Upper
Limits on fixed interest rates based on net debt	100%	100%	100%
Limits on variable interest rates on net debt	25%	25%	25%

Table 14: Maturity structure of borrowing

Maturity structure of new fixed and variable rate borrowing during 2017/18	Upper Limit	Lower Limit
Under 12 months	25%	0%
12 months and within 24 months	50%	0%
24 months and within 5 years	75%	0%
5 years and within 10 years	100%	0%
10 years and above	100%	0%

Table 15: Non-specified investment limit

Upper Limit for total principal sums invested for over 364 days	2015/16	2016/17	2017/18	2018/19	2019/20
Investments	£8m	£8m	£8m	£7m	£6m

Policy on borrowing in advance of need

- 3.17 The Council will not borrow more than, or in advance of, need purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within approved Capital Financing Requirement estimates as required by the Prudential Code (see paragraph 3.3). Decisions to borrow will seek to ensure value for money and security of funds.
- 3.18 The Council will consider borrowing up to 12 months ahead of capital spend:
 - If such capital spend is considered very likely to occur within 12 months;
 - treasury advisers demonstrate that rates are particularly low and likely to move higher within 12 months;
 - treasury advisers evaluate a net saving after assessing cost of carry;
 - a trigger rate(s) will be set by s151 officer in consultation with treasury advisers and treasury officers;
 - borrowing will be conducted in parcels eg £4m could be split into 4 x £1m or 2 x £2m;

- ensure the ongoing revenue liabilities created, and the implications for the future plans and budgets have been fully considered;
- evaluate the economic and market factors that might influence the manner and timing of any decision to borrow;
- consider the merits and demerits of alternative forms of funding;
- consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use;
- 3.19 The foregoing usual procedure will not prevent the s151 officer from forward borrowing to the fullest extent permitted by the Prudential Code, CFR for the current year plus the following two years, if extraordinary conditions arise in the short term to make such action in the interests of the authority.

Debt rescheduling

3.20 Now that the Council has £106.7m of debt, the Accountancy Manager will keep under review opportunities for debt rescheduling. Debt rescheduling is reported to Council at the next meeting after it occurs.

4. ANNUAL INVESTMENT STRATEGY

Investment Policy

- 4.1 The Council will have regard to the DCLG's Guidance on Local Government Investments ("the Guidance") issued in March 2004, any revisions to that guidance such as the March 2010 revision, and the 2011 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA Treasury Management Code"). The Council's investment priorities in order are:
 - 1) security of capital
 - 2) liquidity of investments
 - 3) rate of return
- 4.2 In accordance with the above, and in order to minimise the risk to investments, the Council has below clearly stipulated the minimum acceptable credit quality of counterparties for inclusion on the lending list. The creditworthiness methodology used to create the counterparty list fully accounts for the ratings, watches and outlooks published by all three ratings agencies with a full understanding of what the ratings mean for each agency. CAS's bank ratings service enables real-time monitoring of a bank's rating. Daily emails are sent to the Council to notify of any significant change to a bank rating, and are available on the Passport online portal.
- 4.3 Further, the Council's officers recognise that ratings should not be the sole determinant of the quality of an institution and that it is important to continually assess and monitor the financial sector. Assessment will also take account of information reflecting the opinion of the markets. To this end the Council will engage with its advisors to maintain a monitor on market pricing such as "credit default swaps" (CDS). Other information

- sources used will include the financial press, share price and other such information about the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
- 4.4 The intention of the strategy is to provide security of investment and minimisation of risk.
- 4.5 The Council will also aim to achieve the optimum return on its investments commensurate with proper levels of security and liquidity. The risk appetite of this Council is low in order to give priority to security of investments.
- 4.6 Borrowing of monies purely to invest or on-lend and make a return is unlawful and this Council will not engage in such activity.
- 4.7 'Specified' and 'Non-Specified' Investments categories identify investment instruments for use during the financial year.

Specified Investments

4.8 All specified investments will be sterling denominated, with maturities up to 1 year (including any forward deal time), subject to CAS's colour coding rating system as set out in creditworthiness policy paragraphs 4.16 - 4.21.

Table 16: Specified Investments

able 16: Specified Investments Minimum 'High' Credit Max Sum** per institution					
Type of Investment	Criteria Credit	/ group			
Debt Management Agency Deposit Facility	*	£45m			
Term deposits – local authorities	*	£8m			
Term deposits – banks and building societies	Colour coded as per CAS Weekly counterparty listing (AA- countries & UK only)	£8m			
UK Government Gilts	*	£12m			
Bonds issued by multilateral development banks	*	£8m			
Bonds issued by a financial institution which is guaranteed by the UK government	*	£8m			
Treasury Bills	*	£12m			
Certificates of deposits issued by banks and building societies	Colour coded as per CAS Weekly counterparty listing (AA- countries & UK only)	£8m			
Money Market Funds	AAA	£4m per MMF & £12m total in MMFs			
Enhanced Money Market Funds	AAA	£4m per MMF & £12m total in MMFs			

Non-Specified Investments

4.9 All investments will be sterling denominated.

Table 17: Non-specified Investments - Maturities in excess of 1 year

Financial instrument / institution	Minimum Credit Criteria	Max. maturity period	Max. Sum**
Term deposits – banks and building societies	Colour coded as per CAS Weekly counterparty listing (AA- countries & UK only)	3 years	£8m
Certificates of deposits issued by banks and building societies	Colour coded as per CAS Weekly counterparty listing (AA- countries & UK only)	3 years	£8m
Property Funds	***	25 years	£3m
Corporate Bonds	AA-	3 years	£3m
UK Local Authorities	*	3 years	£8m
UK Government Gilts	*	3 years	£8m
Bonds issued by multilateral development banks	*	3 years	£8m
Bonds issued by a financial institution which is guaranteed by the UK government	*	3 years	£8m

^{*} Government institutions have the highest security, although they are not formally rated.

4.10 Under the Local Authority Mortgage Scheme (LAMS) as per Cabinet report 15 December 2011 the Council has a 5-year deposit of £1m with Lloyds bank. This £1m LAMS investment is a service investment, rather than a treasury management investment, and is therefore outside of the Specified and Non-Specified investment categories where there is a 3year limit for banks. The investment will be due for repayment in April 2017.

Investment Strategy

- 4.11 Cash flow forecast requirements and the outlook for short-term interest rates are important factors considered when making investments. During 2016 interest rates have continued to fall and base rate was cut to 0.25% from 0.5% following the referendum.
- 4.12 In 2017-18 the Council will continue to invest for the longest permitted duration with quality counterparties to maximise return without

^{**} A maximum sum refers to the combined total of specified and non-specified investments with a particular bank, or group if specified.

^{***} Any investment would be subject to an evaluation process and a report to Strategy and Resources Committee.

compromising security. In particular instances the Accountancy Manager will authorise UK investments in excess of a year for example to take advantage of enhanced interest rates on Lloyds 366-day notice deposit. Otherwise, the length of investments permitted will vary if necessary in line CAS advice subject to the Council's 3-year upper limit.

Table 18: Investments maturing after the end of the current financial year.

Financial Institution	Amount £	Maturity	Rate
Rabobank, Netherlands	2,000,000	17/10/2017	0.64%
UBS	2,000,000	11/09/2017	0.67%
Goldman Sachs	2,000,000	01/06/2017	0.63%
Lloyds	2,000,000	22/05/2017	0.60%

- 4.13 Bank Rate was 0.5% from March 2009 until August 2016, when the rate was cut by the Monetary Policy Committee to 0.25%. Bank Rate is not forecast to commence rising until quarter 2 of 2019.
- 4.14 The Council will primarily make short-dated deposits of up to a year with appropriately rated banks or UK local authorities rather than utilising call accounts or money market funds in order to maximise interest. Transaction costs will be taken into account in any investment decision for smaller sums, which means balances of up to £1m may be retained in lower interest rate accounts. This will be done to save transaction costs, where transaction costs would exceed interest earned.
- 4.15 Some preliminary work has been undertaken by CAS to assist the Council to select a property fund. The Council can invest up to £3m in a property fund. The Accountancy Manager may decide to take that process further forward during 2017/18.
- 4.16 At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

Creditworthiness policy

- 4.17 This Council applies the creditworthiness service provided by Capita Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following overlays:
 - credit watches and credit outlooks from credit rating agencies;
 - CDS spreads to give early warning of likely changes in credit ratings;

- sovereign ratings to select counterparties from only the most creditworthy countries.
- 4.18 This modelling approach combines credit ratings, credit Watches and credit Outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments. The Council will therefore use counterparties within the following durational bands:
 - Yellow 3 years
 - **Dark pink** 3 years for Enhanced money market funds with credit score of 1.25
 - **Light pink** 3 years for Enhanced money market funds with credit score of 1.5
 - Purple 2 years
 - Blue 1 year (only applies to nationalised or semi nationalised

UK Banks)

Orange 1 yearRed 6 monthsGreen 100 days

• No colour not to be used

- 4.19 This creditworthiness service uses a wider array of information than just primary ratings. Furthermore, by using a risk weighted scoring system, does not give undue preponderance to just one agency's ratings.
- 4.20 Typically the minimum credit ratings criteria the Council uses will be a short term rating (Fitch or equivalents) of short term rating F1 and a long term rating of A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings, but may still be used. In these instances consideration will be given to the whole range of ratings available, or other topical market information, to support their use.
- 4.21 All credit ratings will be monitored prior to making an investment decision. The Council is alerted to changes to ratings of all three agencies through its use of the CAS creditworthiness service.
 - if a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
 - in addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data on a daily basis via CAS's Passport website. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.
- 4.22 The Council will not place sole reliance on the use of this external service. In addition this Council will use market data and market

information, and information on external support for banks to help support its decision making process.

Country limits

4.23 The following countries have sovereign ratings of AA- or higher, and also have banks operating in sterling markets which have credit ratings of green or above in CAS credit worthiness service.

AAA	AA+	AA	AA-
Australia	Finland	Abu Dhabi (UAE)	Belgium
Canada	Hong Kong	France	
Denmark	USA	Qatar	
Germany		UK	
Luxemburg			
Netherlands			
Norway			
Singapore			
Sweden			
Switzerland			

5. MISCELLANEOUS TREASURY ISSUES

Use of external service providers

- 5.1 Capita Asset Services (CAS) are the Council's treasury management advisers. However, responsibility for treasury management decisions remains with the Council at all times, therefore undue reliance will not be placed upon our external treasury management advisers.
- 5.2 The treasury advice service contract was re-tendered through the Eastern Shires Purchasing Organisation (ESPO) Framework Agreement in 2016 and was awarded to CAS. This is a contract for two years with an option to extend for a further two years. The contract commenced 1 October 2016.

MiFID II

5.3 The second Markets in Financial Instruments Directive (MiFID II) is due to commence 3 January 2018. This may impact the range of investments available to the Council. It requires the Council to be classified as either 'retail' or 'professional', and this classification will be required to be made by each counterparty. It is possible that different counterparties may classify the Council differently. Some counterparties may classify the Council as retail, which would restrict the investment products available.

Member Training

5.4 The CIPFA Code requires the Section 151 officer to arrange the provision of adequate training for members. Member training was held on 6 July 2016 and 25 January 2017. Training is necessary to enable Audit and Standards Committee members to fulfil their role more effectively.