

SLOUGH BOROUGH COUNCIL**TREASURY MANAGEMENT STRATEGY 2014/15****1 Introduction & Background**

The Council is required to adopt the CIPFA Treasury Management in the Public Services: Code of Practice and it is a requirement under that Code of Practice to produce an annual strategy report on proposed treasury management activities for the year.

In accordance with the Treasury Management code, the council defines treasury management activities as:

“The management of the council’s cash flows, its banking, money market and capital market transactions; the effective control of the risks `The purpose of the Treasury Strategy is to establish the framework for the effective and efficient management of the Council’s treasury management activity, within legislative, regulatory, and best practice regimes, and balancing risk against reward in the best interests of stewardship of the public purse.

2 Key Principles

The key principles of the CIPFA Treasury Management in the Public Services: Code of Practice is that:

- Public service organisations should put in place formal and comprehensive objectives, policies and practices, strategies and reporting arrangements for the effective management and control of their treasury management activities.
- Their policies and practices should make clear that the effective management and control of risk are prime objectives of their treasury management activities and that responsibility for these lies clearly within their organisations. Their appetite for risk should form part of their annual strategy, including any use of financial instruments for the prudent management of those risks, and should ensure that priority is given to security and liquidity when investing funds.
- They should acknowledge that the pursuit of value for money in treasury management, and the use of suitable performance measures are valid and important tools for responsible organisations to employ in support of their business and service objectives; and that within the context of effective risk management, their treasury management policies and practices should reflect this.

In setting the Treasury Management Strategy, the Council must have regard for the following factors:

- The current treasury position and debt portfolio position
- The prospects for interest rates
- The approved Capital Programme
- Limits on treasury management activities and prudential indicators

The Authority has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk are therefore central to the Authority's treasury management strategy.

According to the Prudential Code- the professional code of practice to support local authorities in taking capital investment decisions- the Council's prime policy objective of its investment activities is the security and liquidity of funds. Therefore the council should avoid exposing public funds to unnecessary or un-quantified risk. The council should consider the return on their investments; however, this should not be at the expense of security and liquidity. It is therefore important that the council adopt an appropriate approach to risk management with regard to its investment activities. The council employs a Treasury Management advisor, Arlingclose, to assist in the management of risk.

3 Current Economic Climate

The Bank of England's Monetary Policy Committee (MPC) through its recent forward guidance is committed to keeping policy rates low for an extended period using the Labour Force Survey unemployment rate of 7% as a threshold for when it would consider whether or not to raise interest rates, subject to certain knock-outs. Unemployment was 7.7% in August 2013, but Arlingclose do not expect it to fall below the threshold until 2016, due to the UK's flexible workforce.

The flow of credit to households and businesses is slowly improving but is still below pre-crisis levels. The fall in consumer price inflation from the high of 5.2% in September 2011 to 2.7% in September 2013 will allow real wage increases (i.e. after inflation) to slowly turn positive and aid consumer spending.

Stronger growth data in 2013 (0.4% in Q1, 0.7% in Q2 and an initial estimate of 0.8% in Q3) alongside a pick-up in property prices mainly stoked by government initiatives to boost mortgage lending have led markets to price in an earlier rise in rates than warranted under Forward Guidance and the broader economic backdrop. However, with jobs growth picking up slowly, many employees working shorter hours than they would like and benefit cuts set to gather pace, growth is likely to only be gradual. Arlingclose forecasts the MPC will maintain its resolve to keep interest rates low until the recovery is convincing and sustainable.

In the US expectations for the slowing in the pace of asset purchases ('tapering') by the Federal Reserve and the end of further asset purchases will remain predominant drivers of the financial markets. The Fed did not taper in September and has talked down potential tapering in the near term. It now looks more likely to occur in early 2014 which will be supportive of bond and equity markets in the interim.

Credit outlook: The credit risk of banking failures has diminished, but not dissipated altogether. Regulatory changes are afoot in the UK, US and Europe to move away from the bank bail-outs of previous years to bank resolution regimes in which shareholders, bond holders and unsecured creditors are 'bailed in' to participate in any recovery process. This is already manifest in relation to holders of subordinated debt issued by the Co-op which will likely suffer a haircut on its conversion bail-in to alternative securities and/or equity. There are also proposals for EU regulatory reforms to Money Market Funds which will, in all probability, result in these funds

moving to a VNAV (variable net asset value) basis and losing their 'triple-A' credit rating wrapper. Diversification of investments between creditworthy counterparties to mitigate bail-in risk will become even more important in the light of these developments.

Interest rate forecast: Arlingclose forecast is for the Bank Rate to remain flat until late 2016, the risk to the upside (i.e. rates being higher) are weighted more heavily towards the end of the forecast horizon, as the table below shows. Gilt yields are expected to rise over the forecast period with medium- and long-dated gilts expected to rise by between 0.7% and 1.1%.

A more detailed economic and interest rate forecast provided by the Authority's treasury management advisor is attached at Appendix A.

For the purpose of setting the budget, it has been assumed that new investments will be made at an average rate of 0.85%.

4 **Current Position**

The Authority currently has £182.4m of borrowing and £103.0m of investments. Forecast changes in these sums are shown in the balance sheet analysis in table 1 below.

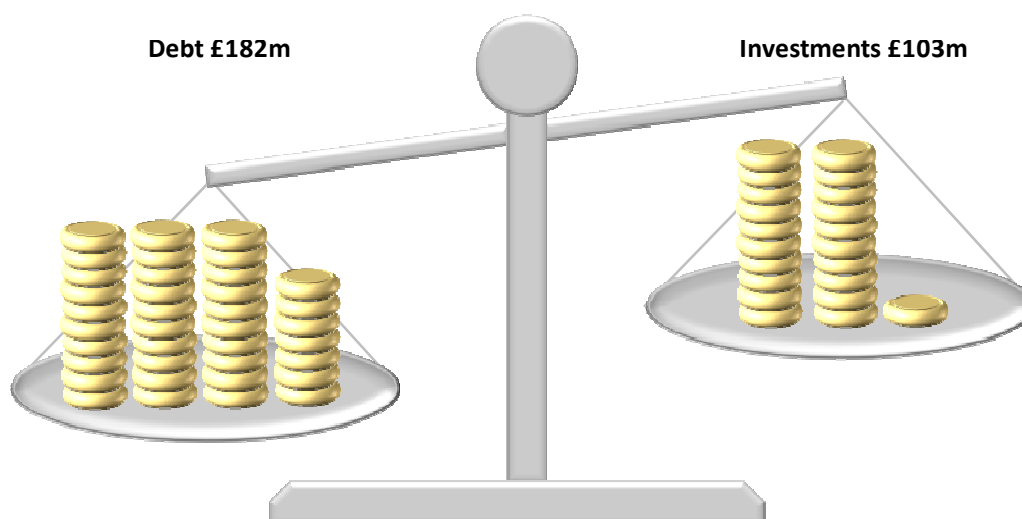


Table 1: Balance Sheet Forecast

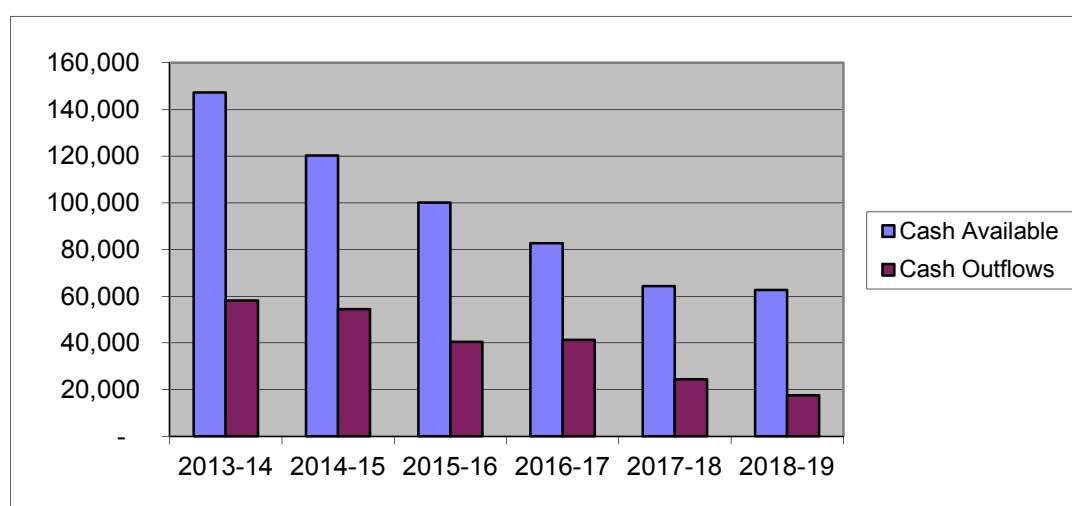
| Slough Borough Council | | | | | |
|---|----------------|----------------|----------------|----------------|----------------|
| Balance Sheet Summary and Projections in £millions | | | | | |
| 31st March | 2013 | 2014 | 2015 | 2016 | 2017 |
| General Fund Capital Financing Requirement | 123.7 | 111.9 | 125.5 | 124.8 | 127.3 |
| HRA Capital Financing Requirement | 159.0 | 156.9 | 159.2 | 161.6 | 163.9 |
| Total Capital Financing Requirement | 282.70 | 268.8 | 284.8 | 286.4 | 291.1 |
| Less: Other long-term liabilities * | (51.26) | (48.50) | (45.60) | (42.64) | (40.92) |
| Loans Capital Financing Requirement | 231.44 | 220.30 | 239.20 | 243.76 | 250.18 |
| Less: External borrowing ** | (193.40) | (182.38) | (206.38) | (206.37) | (206.38) |
| Internal (over) borrowing | 38.04 | 37.92 | 32.82 | 37.39 | 43.80 |
| Less: Usable reserves | (112.4) | (110.2) | (103.0) | (102.2) | (99.8) |
| Net Borrowing Requirement/(Investments) | (74.36) | (72.28) | (70.18) | (64.81) | (56.00) |

* finance leases and PFI liabilities that form part of the Authority's debt

** shows only loans to which the Authority is committed and excludes optional refinancing

Table 1a: Cash Flow Forecast

| | Cash Available | Cash Outflows |
|----------------|-----------------------|----------------------|
| 2013/14 | 147,300 | 58,102 |
| 2014/15 | 120,235 | 54,512 |
| 2015/16 | 100,194 | 40,494 |
| 2016/17 | 82,637 | 41,266 |
| 2017/18 | 64,308 | 24,459 |
| 2018/19 | 62,786 | 17,536 |



The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves are the underlying resources available for investment. CIPFA's Prudential Code for Capital Finance in Local

Authorities recommends that the Authority's total debt should be lower than its highest forecast CFR over the next three years. Table 1 shows that the Authority expects to comply with this recommendation during 2014/15.

5 Borrowing Strategy

The Authority currently holds £182.4 million of loans, a decrease of £11 million on the previous year, as part of its strategy for funding previous years' capital programmes. The decrease is predominantly due to the maturity of a £10m market loan in April 2013. The balance sheet forecast in table 1 shows that the Authority expects to have unfunded capital commitments in 2014/15 to fund big capital projects such as the construction of The Curve.

The Authority's chief objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required. The flexibility to renegotiate loans should the Authority's long-term plans change is a secondary objective.

Given the significant cuts to public expenditure and in particular to local government funding, the Authority's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. With short-term interest rates currently much lower than long-term rates, it is likely to be more cost effective in the short-term to either use internal resources, or to borrow short-term loans instead.

By doing so, the Authority is able to reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk. Whilst such a strategy is most likely to be beneficial over the next 2-3 years as official interest rates remain low, it is unlikely to be sustained in the medium-term. The benefits of internal borrowing will be monitored regularly against the potential for incurring additional costs by deferring borrowing into future years when long-term borrowing rates are forecast to rise. Arlingclose will assist the Authority with this 'cost of carry' and breakeven analysis. Its output may determine whether the Authority borrows additional sums at long-term fixed rates in 2014/15 with a view to keeping future interest costs low, even if this causes additional cost in the short-term.

The Council holds over £30m of its investments in instant access accounts so has no need to borrow short-term loans to cover unexpected cash flow shortages.

The approved sources of long-term and short-term borrowing are:

- Public Works Loan Board
- UK local authorities
- any institution approved for investments (see below)
- any other bank or building society authorised by the Prudential Regulation Authority to operate in the UK
- UK public and private sector pension funds
- capital market bond investors
- LGA Bonds

The Authority has previously raised the majority of its long-term borrowing from the Public Works Loan Board, but it continues to investigate other sources of finance, such as local authority loans and bank loans, that may be available at more favourable rates.

The Authority holds £13m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate as set dates, following which the Authority has the option to either accept the new rate or to repay the loan at no additional cost. £4m of these LOBOS have options during 2014/15, £5m during 2015/16 and £4m in 2026 and although the Authority understands that lenders are unlikely to exercise their options in the current low interest rate environment, there remains an element of refinancing risk. The Authority will take the option to repay LOBO loans at no cost if it has the opportunity to do so.

Short-term and variable rate loans leave the Authority exposed to the risk of short-term interest rate rises and are therefore subject to the limit on the net exposure to variable interest rates in the treasury management indicators below.

Debt Rescheduling: The PWLB allows authorities to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Some bank lenders may also be prepared to negotiate premature redemption terms. The Authority may take advantage of this and replace some loans with new loans, or repay loans without replacement, where this is expected to lead to an overall saving or reduction in risk.

Table 2: Current Borrowing Position

| PWLB or Market | Type | Loan | Start Date | Maturity | Principal | Type |
|----------------|----------|--------|------------|------------|--------------------|--------------------|
| PWLB | Fixed | 497751 | 27/08/2010 | 25/08/2015 | 5,000,000 | Pooled |
| PWLB | Fixed | 497998 | 30/09/2010 | 30/03/2017 | 4,000,000 | Pooled |
| PWLB | Fixed | 497752 | 27/08/2010 | 24/08/2017 | 3,000,000 | Pooled |
| PWLB | Fixed | 497999 | 30/09/2010 | 29/09/2021 | 4,000,000 | Pooled |
| PWLB | Fixed | 498000 | 30/09/2010 | 29/09/2024 | 4,000,000 | Pooled |
| PWLB | Fixed | 498001 | 30/09/2010 | 30/09/2027 | 4,000,000 | Pooled |
| PWLB | Fixed | 487800 | 28/05/2003 | 25/03/2028 | 1,000,000 | Pooled |
| PWLB | Fixed | 500578 | 28/03/2012 | 28/03/2028 | 20,000,000 | HRA Self Financing |
| PWLB | Fixed | 488859 | 08/07/2004 | 25/09/2029 | 500,000 | Pooled |
| PWLB | Fixed | 481989 | 14/01/1999 | 25/03/2030 | 22,278 | Pooled |
| PWLB | Fixed | 489227 | 28/10/2004 | 15/10/2031 | 5,000,000 | Pooled |
| PWLB | Fixed | 500582 | 28/03/2012 | 28/03/2032 | 20,000,000 | HRA Self Financing |
| PWLB | Fixed | 490923 | 22/12/2005 | 01/05/2036 | 3,000,000 | Pooled |
| PWLB | Fixed | 490924 | 22/12/2005 | 01/08/2036 | 5,000,000 | Pooled |
| PWLB | Fixed | 500579 | 28/03/2012 | 28/03/2037 | 20,000,000 | HRA Self Financing |
| PWLB | Fixed | 494837 | 01/10/2008 | 01/08/2038 | 5,000,000 | Pooled |
| PWLB | Fixed | 500584 | 28/03/2012 | 28/03/2039 | 20,000,000 | HRA Self Financing |
| PWLB | Fixed | 500581 | 28/03/2012 | 28/03/2041 | 15,841,000 | HRA Self Financing |
| PWLB | Fixed | 500580 | 28/03/2012 | 28/03/2042 | 20,000,000 | HRA Self Financing |
| PWLB | Variable | 500583 | 31/03/2012 | 28/03/2022 | 10,000,000 | HRA Self Financing |
| Market | LOBO | 64 | 12/07/2004 | 12/07/1954 | 4,000,000 | Pooled |
| Market | LOBO | 65 | 07/04/2006 | 07/04/2066 | 5,000,000 | Pooled |
| Market | LOBO | 66 | 28/04/2006 | 28/04/2066 | 4,000,000 | Pooled |
| | | | | | 182,363,278 | |

6 Housing Revenue Account Self-Financing

Central Government completed its reform of the Housing Revenue Account Subsidy system at the end of 2011/12. Local authorities are required to recharge interest expenditure and income attributable to the HRA in accordance with Determinations issued by the Department for Communities and Local Government.

The Determinations do not set out a methodology for calculating the interest rate to use in each instance. The Council is therefore required to adopt a policy that will set out how interest charges attributable to the HRA will be determined. The CIPFA

Code recommends that authorities present this policy in their TMSS. 3 On 1st April 2012, the Council notionally split each of its existing long-term loans into General Fund and HRA pools. In the future, new long-term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g. premiums and discounts on early redemption) will be charged/ credited to the respective revenue account. As part of the reform of the HRA Housing Revenue Account Subsidy system at the end of 2011/12, the HRA needed to make a payment of £135.841m to the Government. £125.841m of this was financed by PWLB loans listed above. £10m was in respect of an internal loan from the General Fund. The General Fund currently charges 3.27% interest on this amount or £327,000 per annum.

7 Investment Strategy

The Authority holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. An example includes grants where funds are received and held until they are used at a later date. In the past 12 months, the Authority's investment balance has ranged between £82 million and £104 million, and similar levels are expected to be maintained in the forthcoming year

Both the CIPFA Code and the CLG Guidance require the Authority to invest its funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Authority's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk receiving unsuitably low investment income.

Under the current economic environment it would be in the council's interest to place forward dealing as an option to gain beneficial investments. The forward dealing should be utilised with the counterparties listed and only if the rates are beneficial to the council.

The Council is a partner in a Local Asset Backed Vehicle (LABV). The Council will issue loan notes to the LABV in return for the assets contributed by the Council. The value of the loan notes is linked to the success of the LABV and the schemes involved. As a consequence the issuance of loan notes presents a risk to the Council. Importantly, this risk is taken in respect of service purposes as opposed to the prudent management of the Council's financial affairs but it is highlighted within the Council's Treasury Management Strategy Statement. This risk is broader than

simply the credit risk associated with other investments made by the Council in the normal course of the prudent management of its financial affairs since the LABV does not have a credit rating or many of the other indicators of credit risk.

The Council will also consider what, if any, investment in a housing subsidiary would mean for Treasury Management returns over the medium term during the next financial year.

The Authority may invest its surplus funds with any of the counterparties in table 3 below, subject to the cash and time limits shown.

Table 3: Approved Investment Counterparties

| Counterparty | | Cash limit | Time limit † |
|---|-----|------------|--------------|
| Banks and other organisations and securities whose lowest published long-term credit rating from Fitch, Moody's and Standard & Poor's is: | AAA | £15m each | 10 years* |
| | AA+ | | 5 years* |
| | AA | | 4 years* |
| | AA- | | 3 years* |
| | A+ | | 2 years |
| | A | | 1 year |
| | A- | | |
| The Co-operative Bank | | £0.5m | Next Day |
| Royal Bank of Scotland Call Account | | £15m | Next day |
| Bank of Scotland (Lloyds banking Group) | | £15m | 6 Months |
| UK Central Government (irrespective of credit rating) | | unlimited | 50 years** |
| UK Local Authorities (irrespective of credit rating) | | £20m each | 50 years** |
| UK Registered Providers of Social Housing whose lowest published long-term credit rating is A- or higher | | £10m each | 10 years** |
| UK Registered Providers of Social Housing whose lowest published long-term credit rating is BBB- or higher and those without credit ratings | | £5m each | 5 years |
| UK Building Societies without credit ratings | | £3m each | 1 year |
| Money market funds and other pooled funds | | £7m each | n/a |
| Any other organisation, subject to an external credit assessment and specific advice from the Authority's treasury management adviser | | £5m each | 3 months |
| | | £1m each | 1 year |
| | | £100k each | 5 years |

† The time limit is doubled for investments that are secured on the borrower's assets

* But no longer than 2 years in fixed-term deposits and other illiquid instruments

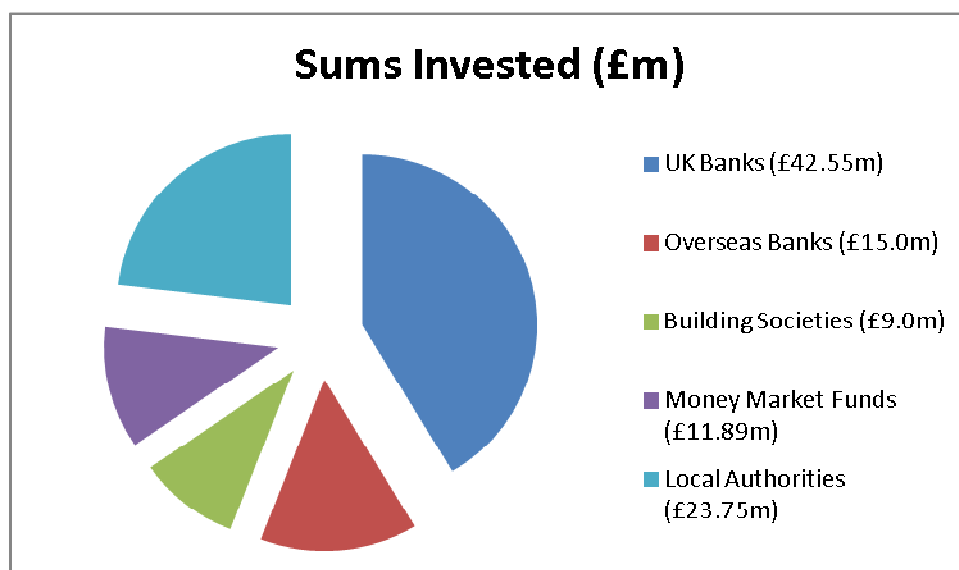
** But no longer than 5 years in fixed-term deposits and other illiquid instruments

There is no intention to restrict investments to bank deposits, and investments may be made with any public or private sector organisations that meet the above credit rating criteria. This reflects a lower likelihood that the UK and other governments will support failing banks as the bail-in provisions in the *Banking Reform Act 2014* and the *EU Bank Recovery and Resolution Directive* are implemented.

In addition, the Authority may invest with organisations and pooled funds without credit ratings, following an external credit assessment and advice from the Authority's treasury management adviser.

The current level of investments and the type of institution invested in is summarised below:

Table 4: Current Investments



Over £44m of the above is in instant access accounts (i.e. Call Accounts and Money Market Funds)

8 Investment Opportunities

Current Account Bank: – The Authority banks with The Co-Operative Bank. At the current time, it does not meet the Authority's minimum credit criteria but will continue to be used for short term liquidity requirements (overnight and weekend investments) and business continuity arrangements. The council aims to limit its overnight exposure with its bankers to under £100,000 and as near to nil as practical.

Registered Providers: Formerly known as Housing Associations, Registered Providers of Social Housing are tightly regulated by the Homes and Communities Agency and retain a high likelihood of receiving government support if needed. The Authority will consider investing with unrated Registered Providers with adequate credit safeguards, subject to receiving independent advice.

Building Societies: The Authority takes additional comfort from the building societies' regulatory framework and insolvency regime where, in the unlikely event of a building society liquidation, the Authority's deposits would be paid out in preference

to retail depositors. The Authority will therefore consider investing with unrated building societies where independent credit analysis shows them to be suitably creditworthy. The Government has announced plans to amend the building society insolvency regime alongside its plans for wide ranging banking reform, and investments in lower rated and unrated building societies will therefore be kept under continuous review.

Money Market Funds: These funds are pooled investment vehicles consisting of money market deposits and similar instruments. They have the advantage of providing wide diversification of investment risks, coupled with the services of a professional fund manager. Fees of between 0.10% and 0.20% per annum are deducted from the interest paid to the Authority. Funds that offer same-day liquidity and aim for a constant net asset value will be used as an alternative to instant access bank accounts, while funds whose value changes with market prices and/or have a notice period will be used for longer investment periods.

Other Pooled Funds: Table 3 above indicates that the Authority will have substantial cash balances available for investment over the medium term. It will therefore consider using pooled bond, equity and property funds that offer enhanced returns over the longer term, but are potentially more volatile in the shorter term. These allow the Authority to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Authority's investment objectives will be monitored regularly.

Other Organisations: The Authority may also invest cash with other organisations, for example by making loans to small businesses. Because of the higher perceived risk of unrated businesses, such investments may provide considerably higher rates of return. They will however only be made following a favourable external credit assessment and on the specific advice of the Authority's treasury management adviser.

Approved Instruments: The Authority may lend or invest money using any of the following instruments:

- interest-bearing bank accounts,
- fixed term deposits and loans,
- callable deposits where the Authority may demand repayment at any time (with or without notice),
- callable loans where the borrower may demand repayment at any time, but subject to a maximum of £10 million in total,
- certificates of deposit,
- bonds, notes, bills, commercial paper and other marketable instruments, and
- Shares in money market funds and other pooled funds.

Investments may be made at either a fixed rate of interest, or at a variable rate linked to a market interest rate, such as LIBOR, subject to the limits on interest rate exposures below.

9 **Risk Management**

Risk Assessment and Credit Ratings: The Authority uses long-term credit ratings from the three main rating agencies Fitch Ratings, Moody's Investors Service and Standard & Poor's Financial Services to assess the risk of investment default. The lowest available counterparty credit rating will be used to determine credit quality, unless an investment-specific rating is available. Credit ratings are obtained and monitored by the Authority's treasury advisers, who will notify changes in ratings as they occur. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:

- no new investments will be made,
- any existing investments that can be recalled or sold at no cost will be, and
- Full consideration will be given to the recall or sale of all other existing investments with the affected counterparty.

Where a credit rating agency announces that an A- rating is on review for possible downgrade (also known as "rating watch negative" or "credit watch negative") so that it may fall below the approved rating criteria, then only investments that can be withdrawn on the next working day will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.p

Other Information on the Security of Investments: The Authority understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations, in which it invests, including credit default swap prices, financial statements, information on potential government support and reports in the quality financial press. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may meet the credit rating criteria.

When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2011, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Authority will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Authority's cash balances, then the surplus will be deposited with the UK Government, via the Debt Management Office for example, or with other local authorities. This will cause a reduction in the level of investment income earned, but will protect the principal sum invested.

Specified Investments: The CLG Guidance defines specified investments as those:

- denominated in pound sterling,
- due to be repaid within 12 months of arrangement,
- not defined as capital expenditure by legislation, and
- invested with one of:

- the UK Government,
- a UK local authority, parish council or community council, or
- A body or investment scheme of “high credit quality”.

For money market funds and other pooled funds “high credit quality” is defined as those having a credit rating of A- or higher.

Non-specified Investments: Any investment not meeting the definition of a specified investment is classed as non-specified. The Authority defines “high credit quality” organisations as those having a credit rating of A- or higher that are domiciled in the UK or a foreign country with a sovereign rating of AA+ or higher. The Authority does not intend to make any investments denominated in foreign currencies, nor any that are defined as capital expenditure by legislation, such as company shares. Non-specified investments will therefore be limited to long-term investments, i.e. those that are due to mature 12 months or longer from the date of arrangement, and investments with bodies and schemes not meeting the definition on high credit quality. Limits on non-specified investments are shown in table 4 below.

Table 5: Non-Specified Investment Limits

| | Cash limit |
|--|-------------------|
| Total long-term investments | £30m |
| Total investments without credit ratings | £20m |
| Total investments in foreign countries rated below AA+ | £10m |
| Total non-specified investments | £60m |

10 Investment Limits

The Authority’s revenue reserves available to cover investment losses are forecast to be £83 million on 31st March 2014. In order that no more than 25% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £20 million. A group of banks under the same ownership or a group of funds under the same management will be treated as a single organisation for limit purposes. Limits will also be placed on investments in brokers’ nominee accounts (e.g. King and Shaxson), foreign countries and industry sectors as below:

The council’s Investment Limits are shown in table 6 below:

Table 6: Investment Limits

| | Cash limit |
|---|-------------------|
| Any single organisation, except the UK Central Government | £15m each |
| UK Central Government | unlimited |
| Any group of organisations under the same ownership | £20m per group |
| Any group of pooled funds under the same management | £20m per manager |
| Negotiable instruments held in a broker’s nominee account | £20m per broker |

| | |
|----------------------|------------------|
| Foreign countries | £20m per country |
| Registered Providers | £20m in total |
| Building Societies | £20m in total |
| Money Market Funds | £50m in total |

11 Prudential Indicators

The Local Government Act 2003 required the Council to have regard to the 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.

A key indicator of prudence is to ensure that over the medium term net borrowing will only be for a capital purpose and that net external borrowing does not except in the short term, exceed the total capital financing requirement in the preceding year plus the estimates of any additional capital financing requirements for the current and the next two financial years.

Estimates of Capital Expenditure: The Authority's planned capital expenditure and financing may be summarised as follows.

Table 7: Capital Programme

| Capital Expenditure and Financing | 2013/14 Revised £m | 2014/15 Estimate £m | 2015/16 Estimate £m | 2016/17 Estimate £m |
|--|---------------------------|----------------------------|----------------------------|----------------------------|
| General Fund | 31,223 | 36,469 | 27,981 | 15,994 |
| HRA | 21,381 | 10,008 | 11,544 | 11,490 |
| Total Expenditure | 52,604 | 46,477 | 39,525 | 27,484 |
| Capital Receipts | -2,500 | -600 | -3,395 | -4,991 |
| Grants & Contributions | -19,284 | -13,726 | -15,121 | -14,674 |
| Revenue | -12,720 | -4,868 | -9,794 | -4,290 |
| Reserves | -6,500 | -6,500 | -6,500 | -6,500 |
| Borrowing (incl. internal) | -11,600 | -20,783 | -4,715 | 2,971 |
| Total Financing | -52,604 | -46,477 | -39,525 | -27,484 |

Estimates of Capital Financing Requirement: The Capital Financing Requirement (CFR) measures the Authority's underlying need to borrow for a capital purpose.

| Capital Financing Requirement | 31.03.14 Revised £m | 31.03.15 Estimate £m | 31.03.16 Estimate £m | 31.03.17 Estimate £m |
|--------------------------------------|----------------------------|-----------------------------|-----------------------------|-----------------------------|
| General Fund | 111,922 | 125,544 | 124,792 | 127,252 |

| | | | | |
|------------------|----------------|----------------|----------------|----------------|
| HRA | 156,897 | 159,229 | 161,561 | 163,893 |
| Total CFR | 268,819 | 284,773 | 286,353 | 291,145 |

The CFR is forecast to rise by £23m over the next three years as capital expenditure financed by debt outweighs resources put aside for debt repayment.

Gross Debt and the Capital Financing Requirement: In order to ensure that over the medium term debt will only be for a capital purpose, the Authority should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. This is a key indicator of prudence.

| Debt | 31.03.14 Revised £m | 31.03.15 Estimate £m | 31.03.16 Estimate £m | 31.03.17 Estimate £m |
|-------------------|------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Borrowing | 182,373 | 206,373 | 206,373 | 206,373 |
| Finance leases | 10,041 | 8,048 | 6,096 | 5,109 |
| PFI liabilities | 38,464 | 37,540 | 36,545 | 35,815 |
| Total Debt | 230,878 | 251,961 | 249,014 | 247,297 |

Total debt is expected to remain below the CFR during the forecast period.

Operational Boundary for External Debt: The operational boundary is based on the Authority's estimate of most likely, i.e. prudent, but not worst case scenario for external debt. It links directly to the Authority's estimates of capital expenditure, the capital financing requirement and cash flow requirements, and is a key management tool for in-year monitoring. Other long-term liabilities comprise finance lease, Private Finance Initiative and other liabilities that are not borrowing but form part of the Authority's debt.

| Operational Boundary | 2013/14 Revised £m | 2014/15 Estimate £m | 2015/16 Estimate £m | 2016/17 Estimate £m |
|-----------------------------|-----------------------------------|------------------------------------|------------------------------------|------------------------------------|
| Borrowing | 256,498 | 259,412 | 262,359 | 264,076 |
| Other long-term liabilities | 48,502 | 45,588 | 42,641 | 40,924 |
| Total Debt | 305,000 | 305,000 | 305,000 | 305,000 |

Authorised Limit for External Debt: The authorised limit is the affordable borrowing limit determined in compliance with the Local Government Act 2003. It is the maximum amount of debt that the Authority can legally owe. The authorised limit provides headroom over and above the operational boundary for unusual cash movements.

| Authorised Limit | 2013/14 Revised £m | 2014/15 Estimate £m | 2015/16 Estimate £m | 2016/17 Estimate £m |
|-----------------------------|---------------------------|----------------------------|----------------------------|----------------------------|
| Borrowing | 266,498 | 269,412 | 272,359 | 274,076 |
| Other long-term liabilities | 48,502 | 45,588 | 42,641 | 40,924 |
| Total Debt | 315,000 | 315,000 | 315,000 | 315,000 |

Ratio of Financing Costs to Net Revenue Stream: This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs, net of investment income.

| Ratio of Financing Costs to Net Revenue Stream | 2013/14 Revised % | 2014/15 Estimate % | 2015/16 Estimate % | 2016/17 Estimate % |
|---|--------------------------|---------------------------|---------------------------|---------------------------|
| General Fund | 5.49% | 6.18% | 6.95% | 5.67% |
| HRA | 13.96% | 13.82% | 13.68% | 13.55% |

Incremental Impact of Capital Investment Decisions: This is an indicator of affordability that shows the impact of capital investment decisions on Council Tax and housing rent levels. The incremental impact is the difference between the total revenue budget requirement of the current approved capital programme and the revenue budget requirement arising from the capital programme

| Incremental Impact of Capital Investment Decisions | 2014/15 Estimate £ | 2015/16 Estimate £ | 2016/17 Estimate £ |
|---|---------------------------|---------------------------|---------------------------|
| General Fund - increase in annual band D Council Tax | 20.62 | 12.19 | 12.39 |
| HRA - increase in average weekly rents | 0 | 0 | 0 |

12 **MRP Statement 2013/14**

CLG's Guidance on Minimum Revenue Provision (issued in 2010) places a duty on local authorities to make a prudent provision for debt redemption. Guidance on Minimum Revenue Provision has been issued by the Secretary of State and local authorities are required to "have regard" to such Guidance under section 21(1A) of the Local Government Act 2003.

The four MRP options available are:

- Option 1: Regulatory Method
- Option 2: CFR Method
- Option 3: Asset Life Method
- Option 4: Depreciation Method

MRP in 2013/14: Options 1 and 2 may be used only for supported (i.e. financing costs deemed to be supported through Revenue Support Grant from Central Government) Non-HRA capital expenditure funded from borrowing. Methods of making prudent provision for unsupported Non-HRA capital expenditure include

Options 3 and 4 (which may also be used for supported Non-HRA capital expenditure if the Authority chooses). There is no requirement to charge MRP in respect of HRA capital expenditure funded from borrowing.

The MRP Statement will be submitted to Council before the start of the 2014/15 financial year. If it is ever proposed to vary the terms of the original MRP Statement during the year, a revised statement should be put to Authority at that time.

The Authority will apply Option 1/Option 2 in respect of supported capital expenditure funded from borrowing and Option 3/Option 4 in respect of unsupported capital expenditure funded from borrowing.

MRP in respect of leases and Private Finance Initiative schemes brought on Balance Sheet under the International Financial Reporting Standards (IFRS) based Accounting Code of Practice will match the annual principal repayment for the associated deferred liability.

13 Treasury Management Indicators

The Council measures and manages its exposures to treasury management risks using the following four new prudential indicators.

- Upper limits on variable rate exposure. This indicator identifies a maximum limit for variable interest rates based upon the debt provision net of investments.
- Upper limits on fixed rate exposure. Similar to the previous indicators, this covers a maximum limit on fixed interest rates
- Total principal funds invested for a period longer than 364 days. These limits are set to reduce the need for early sale of an investment and are based on the availability of investments after each year-end
- Maturity Structure of borrowing. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing

Interest Rate Exposures: This indicator is set to control the Council's exposure to interest rate risk. The upper limits on fixed and variable rate interest rate exposures, expressed as the amount of principal borrowed will be:

| LIMITS ON INTEREST RATE EXPOSURE | | | |
|--|----------------|----------------|----------------|
| | 2014/15 | 2015/16 | 2016/17 |
| Limit on Principal invested beyond year end | £20m | £15m | £10m |
| Upper limit on fixed interest rate exposure | £100m | £100m | £100m |
| Upper limit on variable interest rate exposure | £50m | £50m | £50m |

Fixed rate investments and borrowings are those where the rate of interest is fixed for the whole financial year. Instruments that mature during the financial year are classed as variable rate.

Mature Structure of Borrowing:

This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of fixed rate borrowing will be:

| MATURITY STRUCTURE OF BORROWING | | | |
|--|-----------------------|--------------|--------------|
| | Existing Level | Lower | Upper |
| Under 12 months | 4.0 | 0% | 50% |
| 12 months and within 24 months | 9.0 | 0% | 50% |
| 24 months and within 5 years | 7.0 | 0% | 50% |
| 5 years and within 10 years | 8.0 | 0% | 75% |
| 10 years and within 15 years | 30.5 | 25% | 95% |
| 15 years and within 20 years | 25.0 | 25% | 95% |
| 20 years and within 25 years | 53.0 | 25% | 95% |
| Over 25 years | 35.8 | 25% | 95% |

14 Other Items

There are a number of additional items that the Authority is obliged by CIPFA or CLG to include in its Treasury Management Strategy.

Policy on Use of Financial Derivatives: Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in Section 1 of the Localism Act 2011 removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment).

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, although the risks they present will be managed in line with the overall treasury risk management strategy.

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 the relevant foreign country limit.

Policy on Apportioning Interest to the HRA: On 1st April 2012, the Authority notionally split each of its existing long-term loans into General Fund and HRA pools. In the future, new long-term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g. premiums and discounts on early redemption) will be charged/ credited to the respective revenue account. Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative. This balance will be measured each month and interest

transferred between the General Fund and HRA at the Authority's average interest rate on investments, adjusted for credit risk.

Investment Training: The needs of the Authority's treasury management staff for training in investment management are assessed every three months as part of the staff appraisal process, and additionally when the responsibilities of individual members of staff change.

Staffs regularly attend training courses, seminars and conferences provided by Arlingclose and CIPFA. Relevant staffs are also encouraged to study professional qualifications from CIPFA and other appropriate organisations.

Investment Advisers: The Authority has appointed Arlingclose Limited as treasury management advisers and receives specific advice on investment, debt and capital finance issues.

Investment of Money Borrowed in Advance of Need: The Authority may, from time to time, borrow in advance of need, where this is expected to provide the best long term value for money. Since amounts borrowed will be invested until spent, the Authority is aware that it will be exposed to the risk of loss of the borrowed sums, and the risk that investment and borrowing interest rates may change in the intervening period. These risks will be managed as part of the Authority's overall management of its treasury risks.

15 Future Options

The CLG Guidance and the CIPFA Code do not prescribe any particular treasury management strategy for local authorities to adopt. The Chief Financial Officer believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

| Alternative | Impact on income and expenditure | Impact on risk management |
|---|--|--|
| Invest in a narrower range of counterparties and/or for shorter times | Interest income will be lower | Reduced risk of losses from credit related defaults |
| Invest in a wider range of counterparties and/or for longer times | Interest income will be higher | Increased risk of losses from credit related defaults |
| Reduce level of borrowing | Saving on debt interest is likely to exceed lost investment income. Impact of premiums. | Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs will be less certain. |
| Invest with Local Authorities for periods in excess of 12 months | Higher rates achieved initially. | Risk that interest rates will rise (interest rate risk) |
| Invest in Building Societies not currently on the Council's Counterparty Risk | Potential higher returns | Risk of Credit Related Defaults as most Building Societies are unrated. |
| Invest in Government Treasury Bills | Very Low returns | No risk of credit default. |

| | | |
|---|---|---|
| Invest in Registered Providers/Housing Associations. | 5 year loan floating at 200bps over 6-month LIBOR (currently 0.59%) with a credit rated RP (A2 with Moody's) —5 year fixed rate loan at c3.35% with an unrated RP (Unrated RPs will pledge a pool of housing assets as security for loans borrow). Downside 6 weeks set up time. | Strong regulatory framework and oversight; Conservative financial management; High likelihood of government support |
| Invest in pooled Property Funds | Potentially higher returns though will require more monitoring and returns could fluctuate greatly. | Risks of investing in a property fund – very similar to the risks of direct purchases —Void periods will result in lower returns —Falling property values can result in capital losses —Entry and exit costs – either as subscription/redemption fees or a bid-offer spread —Low liquidity compared to other types of pooled funds – 6 months' notice is common Our TMA therefore recommend a minimum investment horizon of at least 5 years |
| Pooled Funds-Liquidity Plus | Next step up from Money Market Funds. Almost as liquid as MMFs but with potentially higher returns. | As secure as MMFs we currently use but with greater fluctuations in yield. |
| Other Pooled Funds- e.g. Corporate Bonds, Equities. | Pooled funds provide opportunities for income as well as capital appreciation. Accounting rules typically mean that capital gains and losses are not taken to revenue until units are sold | Due to the potential volatility, the Council should be prepared for the possibility of capital value to fall before it rises |
| Upfront Payment of Employer Contributions to the Pension Fund | The council will save over 3% in employer contributions if it makes an upfront payment of approx £10m to the Pension Fund. | No risk other than the estimate must be robust and cannot under estimate the amount of contributions payable in the year. |
| Loan Notes issued through SRP. | | |

Ethical Investment Policy

The preservation of capital is the Council's principal and overriding priority. The banks and building societies on the Council's lending list are selected only if the institutions and the sovereign meet minimum credit criteria. In accordance with its social and corporate governance responsibilities, the Council seeks to support institutions which additionally have an ethical and responsible approach to environmental and social issues including employment and global trade

Appendix A - Arlingclose Economic & Interest Rate Forecast December 2013

Underlying assumptions:

- Growth continues to strengthen with the second estimate for Q3 growth coming in at an unrevised 0.8%. The service sector remains the main driver of growth, boosted by a contribution from construction.
- The unemployment rate has fallen to 7.6%. The pace of decline in this measure will be dependent on a slower expansion of the workforce than the acceleration in the economy, alongside the extent of productivity.
- The CPI for November has fallen to 2.1%, a much more comfortable position for the MPC. Utility price increases are expected to keep CPI above the 2% target in 2014, before falling back again.
- The principal measure in the MPC's Forward Guidance on interest rates is the Labour Force Survey (LFS) unemployment rate. The MPC intends not to raise the Bank Rate from its current level of 0.5% at least until this rate has fallen to a threshold of 7%.
- The reduction in uncertainty and easing of credit conditions have begun to unlock demand, much of which has fed through to the housing market. In response to concerns over a house price bubble, the Bank of England announced a curtailment of the Funding for Lending Scheme, which will henceforth concentrate on business lending only.
- The MPC will not hesitate to use macro prudential and regulatory tools to deal with emerging risks (such as curtailing the FLS). Absent risks to either price stability or financial stability, the MPC will only tighten policy when it is convinced about the sustained durability of economic growth.
- Federal Reserve monetary policy expectations - the slowing in the pace of asset purchases ('tapering') and the end of further asset purchases - will remain predominant drivers of the financial markets. Tapering of asset purchases will begin in Q1 2014. The US political deadlock over the debt ceiling will need resolving in Q1 2014.
- The European backstop mechanisms have lowered the risks of catastrophic meltdown. The slightly more stable economic environment at the aggregate Eurozone level could be undone by political risks and uncertainty in Italy, Spain and Portugal (doubts over longevity of their coalitions). The ECB has discussed a third LTRO, as credit conditions remain challenging for European banks.
- China data has seen an improvement, easing markets fears. Chinese leaders have signalled possible monetary policy tightening.
- On-going regulatory reform and a focus on bail-in debt restructuring of is likely to prolong banking sector deleveraging and maintain the corporate credit bottleneck.

Forecast:

- Our projected path for short term interest rates remains flat. Markets are still pricing in an earlier rise in rates than warranted under Forward Guidance and the broader economic backdrop. The MPC will not raise rates until there is a sustained period of strong growth. However, upside risks weight more heavily at the end of our forecast horizon.
- We continue to project gilt yields on an upward path through the medium term. The recent climb in yields was overdone given the soft fundamental global outlook and risks surrounding the Eurozone, China and US.

| | Mar-14 | Jun-14 | Sep-14 | Dec-14 | Mar-15 | Jun-15 | Sep-15 | Dec-15 | Mar-16 | Jun-16 | Sep-16 | Dec-16 | Mar-17 |
|---------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Official Bank Rate | | | | | | | | | | | | | |
| Upside risk | | 0.25 | 0.25 | 0.25 | 0.25 | 0.25 | 0.50 | 0.50 | 0.50 | 0.75 | 0.75 | 0.75 | 1.00 |
| Arlingclose Central Case | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 |
| Downside risk | | | | | | | | | | | | | |
| 3-month LIBID rate | | | | | | | | | | | | | |
| Upside risk | 0.20 | 0.25 | 0.30 | 0.35 | 0.40 | 0.50 | 0.55 | 0.60 | 0.65 | 0.70 | 0.75 | 0.90 | 0.95 |
| Arlingclose Central Case | 0.45 | 0.45 | 0.50 | 0.55 | 0.65 | 0.75 | 0.75 | 0.75 | 0.75 | 0.75 | 0.80 | 0.80 | 0.80 |
| Downside risk | | | 0.05 | 0.10 | 0.20 | 0.30 | 0.30 | 0.30 | 0.30 | 0.30 | -0.35 | -0.35 | -0.35 |
| 1-yr LIBID rate | | | | | | | | | | | | | |
| Upside risk | 0.35 | 0.30 | 0.35 | 0.40 | 0.45 | 0.50 | 0.60 | 0.70 | 0.75 | 0.75 | 0.75 | 0.80 | 0.80 |
| Arlingclose Central Case | 0.90 | 0.95 | 0.95 | 0.95 | 1.00 | 1.05 | 1.10 | 1.15 | 1.20 | 1.25 | 1.30 | 1.40 | 1.40 |
| Downside risk | -0.25 | -0.25 | -0.25 | -0.30 | -0.35 | -0.40 | -0.45 | -0.50 | -0.50 | -0.50 | -0.50 | -0.50 | -0.50 |
| 5-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.50 | 0.75 | 0.75 | 0.75 | 0.85 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 |
| Arlingclose Central Case | 1.45 | 1.50 | 1.55 | 1.60 | 1.65 | 1.70 | 1.75 | 1.85 | 1.95 | 2.10 | 2.30 | 2.50 | 2.50 |
| Downside risk | -0.50 | -0.50 | -0.50 | -0.50 | -0.55 | -0.60 | -0.60 | -0.60 | -0.65 | -0.75 | -0.80 | -0.80 | -0.80 |
| 10-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.50 | 0.50 | 0.50 | 0.65 | 0.75 | 0.85 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 |
| Arlingclose Central Case | 2.55 | 2.60 | 2.65 | 2.70 | 2.75 | 2.80 | 2.85 | 2.90 | 3.00 | 3.10 | 3.30 | 3.50 | 3.50 |
| Downside risk | -0.50 | -0.50 | -0.50 | -0.50 | -0.55 | -0.60 | -0.60 | -0.60 | -0.65 | -0.75 | -0.80 | -0.80 | -0.80 |
| 20-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.50 | 0.75 | 0.75 | 0.75 | 0.85 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 |
| Arlingclose Central Case | 3.25 | 3.30 | 3.35 | 3.40 | 3.45 | 3.50 | 3.55 | 3.65 | 3.75 | 3.85 | 4.05 | 4.15 | 4.15 |
| Downside risk | -0.50 | -0.50 | -0.50 | -0.50 | -0.55 | -0.60 | -0.60 | -0.60 | -0.65 | -0.70 | -0.75 | -0.80 | -0.80 |
| 50-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.50 | 0.75 | 0.75 | 0.75 | 0.75 | 0.75 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 |
| Arlingclose Central Case | 3.45 | 3.50 | 3.55 | 3.60 | 3.65 | 3.70 | 3.75 | 3.80 | 3.85 | 3.95 | 4.05 | 4.15 | 4.15 |
| Downside risk | -0.50 | -0.50 | -0.50 | -0.50 | -0.55 | -0.60 | -0.60 | -0.60 | -0.65 | -0.70 | -0.75 | -0.80 | -0.80 |