SLOUGH BOROUGH COUNCIL

TREASURY MANAGEMENT STRATEGY 2015/16

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 <u>Key Principles</u>

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 <u>Current Economic Climate</u>

There is momentum in the UK economy, with a continued period of growth through domestically-driven activity and strong household consumption. There are signs that growth is becoming more balanced. The greater contribution from business investment should support continued, albeit slower, expansion of GDP. However, inflationary pressure is benign and is likely to remain low in the short-term. There have been large falls in unemployment but levels of part-time working, selfemployment and underemployment are significant and nominal earnings growth remains weak and below inflation.

The MPC's focus is on both the degree of spare capacity in the economy and the rate at which this will be used up, factors prompting some debate on the Committee. Despite two MPC members having voted for an 0.25% increase in rates at each of the meetings August 2014 onwards, some Committee members have become more concerned that the economic outlook is less optimistic than at the time of the August Inflation Report.

Credit outlook: The transposition of two European Union directives into UK legislation in the coming months will place the burden of rescuing failing EU banks disproportionately onto unsecured local authority investors. The Bank Recovery and Resolution Directive promotes the interests of individual and small businesses covered by the Financial Services Compensation Scheme and similar European schemes, while the recast Deposit Guarantee Schemes Directive includes large companies into these schemes. The combined effect of these two changes is to leave public authorities and financial organisations (including pension funds) as the only senior creditors likely to incur losses in a failing bank after July 2015.

The continued global economic recovery has led to a general improvement in credit conditions since last year. This is evidenced by a fall in the credit default swap spreads of banks and companies around the world. However, due to the above legislative changes, the credit risk associated with making unsecured bank deposits will increase relative to the risk of other investment options available to the Authority.

Interest rate forecast: The Authority's treasury management advisor Arlingclose forecasts the first rise in official interest rates in August 2015 and a gradual pace of increases thereafter, with the average for 2015/16 being around 0.75%. Arlingclose believes the normalised level of the Bank Rate post-crisis to range between 2.5% and 3.5%. The risk to the upside (i.e. interest rates being higher) is weighted more

towards the end of the forecast horizon. On the downside, Eurozone weakness and the threat of deflation have increased the risks to the durability of UK growth. If the negative indicators from the Eurozone become more entrenched, the Bank of England will likely defer rate rises to later in the year. Arlingclose projects gilt yields on an upward path in the medium term, taking the forecast average 10 year PWLB loan rate for 2015/16 to 3.40%.

A more detailed economic and interest rate forecast provided by the Arlingclose 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 <u>Current Position</u>

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.

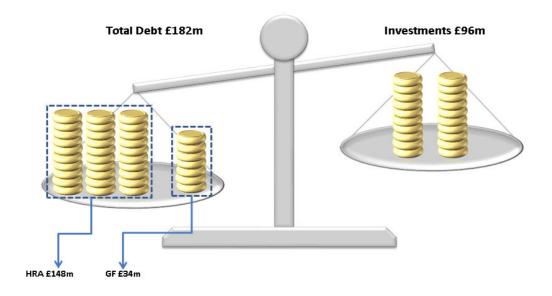


Table 1: Balance Sheet Forecast

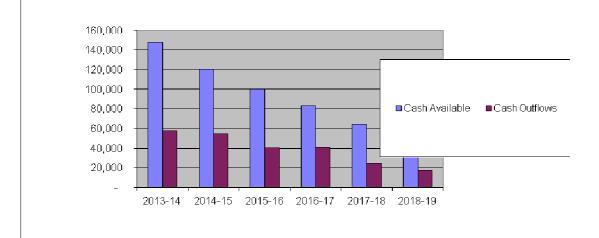
| Slough Borough Council | | | | | | | |
|--|----------|---------|---------|---------|---------|--|--|
| Balance Sheet Summary and Projections in £millions | | | | | | | |
| 31 st March | 2014 | 2015 | 2016 | 2017 | 2018 | | |
| General Fund Capital Financing Requirement | 128.3 | 137.1 | 137.3 | 114.9 | 113.8 | | |
| HRA Capital Financing Requirement | 159.0 | 159.6 | 163.9 | 164.1 | 165.3 | | |
| Total Capital Financing Requirement | 287.3 | 296.7 | 301.2 | 279.0 | 279.1 | | |
| Less: Other long-term liabilities * | (48.35) | (45.30) | (41.96) | (40.07) | (38.20) | | |
| Loans Capital Financing Requirement | 238.97 | 251.40 | 259.20 | 238.9 | 240.90 | | |
| Less: External borrowing ** | (182.87) | (182.8) | (177.8) | (173.8) | (170.8) | | |
| Internal (over) borrowing | 56.1 | 68.60 | 81.40 | 65.10 | 70.01 | | |
| Less: Usable reserves | (126.5) | (120.1) | (127.9) | (110.2) | (114.2) | | |
| Net Borrowing Requirement/(Investments) | (70.4) | (51.50) | (46.5) | (45.1) | (44.2) | | |

* 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 |
|---------|----------------|---------------|
| 2014/15 | 119,125 | 40,284 |
| 2015/16 | 103,759 | 57,631 |
| 2016/17 | 88,301 | 49,929 |
| 2017/18 | 84,174 | 27,064 |
| 2018/19 | 69,963 | 37,148 |
| 2019/20 | 60,414 | 32,486 |



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 2015/16.

5 Borrowing Strategy

The Authority currently holds £182.3 million of loans, which is the same as the previous year, as part of its strategy for funding previous years' capital programmes. The balance sheet forecast in table 1 shows that the Authority does not expect to need to borrow in 2015/16.

Objectives: 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.

Strategy: 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. 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 2015/16 with a view to keeping future interest costs low, even if this causes additional cost in the short-term.

In addition, the Authority may borrow short-term loans (normally for up to one month) to cover unexpected cash flow shortages.

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

- Public Works Loan Board (PWLB)
- any institution approved for investments (see below)
- any other bank or building society authorised to operate in the UK
- UK public and private sector pension funds
- capital market bond investors
- Local Capital Finance Company and other special purpose companies created to enable local authority bond issues

In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:

- operating and finance leases
- hire purchase
- Private Finance Initiative
- sale and leaseback

The Authority has previously raised the majority of its long-term borrowing from the PWLB 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.

LGA Bond Agency: Local Capital Finance Company was established in 2014 by the Local Government Association as an alternative to the PWLB. It plans to issue bonds on the capital markets and lend the proceeds to local authorities. This will be a more complicated source of finance than the PWLB for three reasons: borrowing authorities may be required to provide bond investors with a joint and several guarantee over the very small risk that other local authority borrowers default on their loans; there will be a lead time of several months between committing to borrow and knowing the interest rate payable; and up to 5% of the loan proceeds will be withheld from the Authority and used to bolster the Agency's capital strength instead. Any decision to borrow from the Agency will therefore be the subject of a separate report to Cabinet and the Capital Strategy Board.

LOBOs: 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 2015/16, 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. Total borrowing via LOBO loans will be limited to the current £13m.

Short-term and Variable Rate loans: These 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. Other 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 cost saving or a reduction in risk.

| | Current B | orrowing | Position | | | |
|---------|-----------|----------|------------|------------|-------------|--------------------|
| PWLB or | | | | | | Туре |
| Market | Туре | Loan | Start Date | Maturity | Principal | |
| 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 | 31,864 | 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 | 12/07/2054 | 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 |
| | | | | | 182,372,864 | |

Table 2: Current Borrowing Position

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. In the past 12 months, the Authority's investment balance has ranged between £84 and £104 million, and similar levels are expected to be maintained in the forthcoming year.

Objectives: 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.

Strategy: Given the increasing risk and continued low returns from short-term unsecured bank investments, the Authority aims to further diversify into more secure and higher yielding asset classes during 2015/16. This is especially the case for the estimated $\pounds[X]m$ that is available for longer-term investment. The majority of the Authorities surplus cash is currently invested in short-term unsecured bank deposits, certificates of deposit and money market funds. This diversification will therefore represent a substantial change in strategy over the coming year.

Under the current economic environment it may 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.

Approved Counterparties: The Authority may invest its surplus funds with any of the counterparty types in table 3 below, subject to the cash limits (per counterparty) and the time limits shown.

| Credit Rating | Banks Unsecured | Banks Secured | Government | Corporates | Registered Providers |
|------------------|--------------------|------------------|-------------------------|------------|-------------------------|
| UK Govt | n/a | n/a | £ Unlimited 50 years | n/a | n/a |
| AAA | £15m | £15m | £15m | £5m | £5m |
| | 5 years | 20 years | 50 years | 20 years | 20 years |
| AA+ | £15m | £15m | £15m | £5m | £5m |
| AAT | 5 years | 10 years | 25 years | 10 years | 10 years |
| AA | £15m | £15m | £15m | £5m | £5m |
| AA | 4 years | 5 years | 15 years | 5 years | 10 years |
| AA- | £15m | £15m | £15m | £5m | £5m |
| AA- | 3 years | 4 years | 10 years | 4 years | 10 years |
| A+ | £5m | £15m | £15m | £5m | £5m |
| AT | 2 years | 3 years | 5 years | 3 years | 5 years |
| ^ | £5m | £15m | £15m | £5m | £5m |
| A | 13 months | 2 years | 5 years | 2 years | 5 years |
| A- | £5m 6 | £5m | £15m | £5m | £5m |
| A- | months | 13 months | 5 years | 13 months | 5 years |

Table 3: Approved Investment Counterparties and Limits

| BBB+ | £5m | £5m | £15m | £2.5m | £2.5m |
|-----------------|-------------------------|------------------|-----------------|----------|----------------|
| 100 days | | 6 months | 2 years | 6 months | 2 years |
| BBB or BBB- | £5m next day only | £15m 100 days | n/a | n/a | n/a |
| None | £3m 12 months | n/a | £5m 25 years | n/a | £5m 5 years |
| Pooled funds | £10m per fund | | | | |

This table must be read in conjunction with the notes below

† 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:

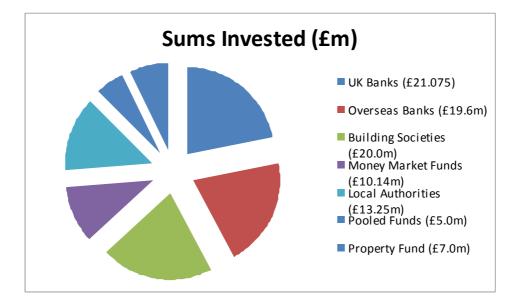


 Table 4: Current Investments

£14.74m of the above is in instant access accounts (i.e. Call Accounts and Money Market Funds)

8 Investment Opportunities

Credit Rating: Investment decisions are made by reference to the lowest published long-term credit rating from Fitch, Moody's or Standard & Poor's. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used.

Banks Unsecured: Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail.

Banks Secured: Covered bonds, reverse repurchase agreements and other collateralised arrangements with banks and building societies. These investments are secured on the bank's assets, which limits the potential losses in the unlikely event of insolvency, and means that they are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit rating, the highest of the collateral credit rating and the counterparty credit rating will be used to determine cash and time limits. The combined secured and unsecured investments in any one bank will not exceed the cash limit for secured investments.

Government: Loans, bonds and bills issued or guaranteed by national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is an insignificant risk of insolvency. Investments with the UK Central Government may be made in unlimited amounts for up to 50 years.

Corporates: Loans, bonds and commercial paper issued by companies other than banks and registered providers. These investments are not subject to bail-in, but are exposed to the risk of the company going insolvent. Loans to unrated companies will only be made as part of a diversified pool in order to spread the risk widely.

Registered Providers: Loans and bonds issued by, guaranteed by or secured on the assets of Registered Providers of Social Housing, formerly known as Housing Associations. These bodies are tightly regulated by the Homes and Communities Agency and, as providers of public services, they retain a high likelihood of receiving government support if needed.

Pooled Funds: Shares in diversified investment vehicles consisting of the any of the above investment types, plus equity shares and property. These funds have the advantage of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a fee. Money Market 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 pooled funds whose value

changes with market prices and/or have a notice period will be used for longer investment periods.

Bond, equity and property funds offer enhanced returns over the longer term, but are more volatile in the short 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.

9 <u>Risk Management</u>

Risk Assessment and Credit Ratings: 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 a credit 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.

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 or invested in government treasury bills 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,
 - o a UK local authority, parish council or community council, or
 - o a body or investment scheme of "high credit quality".

The Authority defines "high credit quality" organisations and securities 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. 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 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 3 below.

| Table 3: Non-Specified Investment Limits |
|--|
|--|

| | Cash limit |
|--|------------|
| Total long-term investments | £40m |
| Total investments without credit ratings or rated below A- | £10m |
| Total investments with institutions domiciled 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 £88 million on 31st March 2015. In order that no more than 20% 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 £15 million. A group of banks under the same ownership will be treated as a single organisation for limit purposes. Limits will also be placed on fund managers, investments in brokers' nominee accounts, foreign countries and industry sectors as below:

| | Cash limit |
|---|------------------|
| Any single organisation, except the UK Central Government | £15m each |
| UK Central Government | unlimited |
| Any group of organisations under the same ownership | £15m per group |
| Any group of pooled funds under the same management | £25m per manager |
| Negotiable instruments held in a broker's nominee | £25m per broker |

Table 4: Investment Limits

| account | |
|---|------------------|
| Foreign countries | £10m per country |
| Registered Providers | £25m in total |
| Unsecured investments with Building Societies | £10m in total |
| Loans to unrated corporates | £10m in total |
| Money Market Funds | £50m in total |

11 <u>Prudential Indicators</u>

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.

| Capital Expenditure and Financing | 2014/15 Revised £m | 2015/16 Estimate £m | 2016/17 estimate £m | 2017/18 Estimate £m |
|--------------------------------------|--------------------------|---------------------------|---------------------------|---------------------------|
| General Fund | 39,798 | 45,502 | 32,960 | 10,900 |
| HRA | 19,155 | 11,544 | 11,489 | 10,264 |
| Total Expenditure | 58,953 | 57,046 | 44,449 | 21,164 |
| Capital Receipts | -8,528 | -8,372 | -7,142 | -3,703 |
| Grants & Contributions | -18,351 | -20,957 | -24,953 | -7,363 |
| Revenue | -4,814 | -4,144 | -3,789 | -2,264 |
| Reserves | -6,500 | -6,500 | -6,500 | -6,500 |
| Borrowing (incl. internal) | -20,760 | -17,073 | -2,065 | -1,334 |
| Total Financing | -58,953 | -57,046 | -44,449 | -21,164 |

Table 5: Capital Programme

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 | 31.03.15 Revised £m | 31.03.16 Estimate £m | 31.03.17 Estimate £m | 31.03.18 Estimate £m |
|----------------------------------|---------------------------|----------------------------|----------------------------|----------------------------|
| General Fund | 137,125 | 137,292 | 114,880 | 113,777 |
| HRA | 159,603 | 163,935 | 164,167 | 165,299 |

| Total CFR | 296,728 | 301,227 | 279,047 | 279,076 |
|-----------|---------|---------|---------|---------|
|-----------|---------|---------|---------|---------|

The CFR is forecast to rise by £15m over the next two years as capital expenditure financed by internal borrowing outweighs resources put aside for debt repayment before reducing in subsequent years where budgeted capital expenditure reduces.

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 | 31.03.15 Revised £m | Revised Estimate Estimat | | | | |
|-----------------|---------------------------|--------------------------|---------|---------|--|--|
| Borrowing | 182,372 | 177,372 | 173,372 | 170,372 | | |
| Finance leases | 10,061 | 8,951 | 7,862 | 6,917 | | |
| PFI liabilities | 37,540 | 36,545 | 35,816 | 35,087 | | |
| Total Debt | 229,973 | 222,868 | 217,050 | 212,376 | | |

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 | 2014/15 Revised £m | 2015/16 Estimate £m | 2016/17 Estimate £m | 2017/18 Estimate £m | |
|-----------------------------|--------------------------|---------------------------|---------------------------|---------------------------|--|
| Borrowing | 257,399 | 259,504 | 261,322 | 262,996 | |
| Other long-term liabilities | 47,601 | 45,496 | 43,678 | 42,004 | |
| 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 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | |
|------------------|---------|----------|----------|----------|--|
| | Revised | Estimate | Estimate | Estimate | |
| | £m | £m | £m | £m | |
| Borrowing | 267,399 | 269,504 | 271,322 | 272,996 | |

| Other long-term liabilities | 47,601 | 45,496 | 43,678 | 42,004 |
|-----------------------------|---------|---------|---------|---------|
| 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 | 2014/15 Revised % | 2015/16 Estimate % | 2016/17 Estimate % | 2017/18 Estimate % | | |
|--|-------------------------|--------------------------|--------------------------|--------------------------|--|--|
| General Fund | 4.46% | 4.98% | 4.40% | 4.45% | | |
| HRA | 13.12% | 12.89% | 12.66% | 12.45% | | |

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 | 2015/16 Estimate £ | 2016/17 Estimate £ | 2017/18 Estimate £ | | |
|---|--------------------------|--------------------------|--------------------------|--|--|
| General Fund - increase in annual band D Council Tax | 11.56 | 11.14 | 4.0 | | |
| HRA - increase in average weekly rents | 0 | 0 | 0 | | |

12 MRP Statement 2014/15

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 2014/15: 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 2015/16 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 <u>Treasury Management Indicators</u>

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 | £45m | £45m | £45m | | | | | | |
| 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 | | | | | | | | | |
| Under 12 months | 13.0 | 0% | 50% | | | | | | |
| 12 months and within 24 months | 4.0 | 0% | 50% | | | | | | |
| 24 months and within 5 years | 3.0 | 0% | 50% | | | | | | |
| 5 years and within 10 years | 18.0 | 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 <u>Other Items</u>

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 <u>Future Options</u>

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 | Strong regulatory framework and oversight; Conservative financial management; High likelihood of government support |

| | loans borrow). Downside 6 | |
|---|--|---|
| Invest in pooled Property Funds | weeks set up time. 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. | | |

16 <u>Ethical Investment Policy</u>

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

The Council could seek to invest in specific ethical funds, though there would be a charge to undertake the risk analysis of doing so from the Council's Treasury Management advisors

Appendix A – Arlingclose Economic & Interest Rate Forecast October 2014

Underlying assumptions:

- The UK economic recovery has continued. Household consumption remains a significant driver, but there are signs that growth is becoming more balanced. The greater contribution from business investment should support continued, albeit slower, expansion of GDP throughout this year.
- We expect consumption growth to slow, given softening housing market activity, the muted outlook for wage growth and slower employment growth. The subdued global environment suggests there is little prospect of significant contribution from external demand.
- Inflationary pressure is currently low and is likely to remain so in the shortterm. Despite a correction in the appreciation of sterling against the US dollar, imported inflation remains limited. We expect commodity prices will remain subdued given the weak outlook for global growth.
- The MPC's focus is on both the degree of spare capacity in the economy and the rate at which this will be used up, factors prompting some debate on the Committee.
- Nominal earnings growth remains weak and below inflation, despite large falls in unemployment, which poses a dilemma for the MPC. Our view is that spare capacity remains extensive. The levels of part-time, self-employment and underemployment are significant and indicate capacity within the employed workforce, in addition to the still large unemployed pool. Productivity growth can therefore remain weak in the short term without creating undue inflationary pressure.
- However, we also expect employment growth to slow as economic growth decelerates. This is likely to boost productivity, which will bear down on unit labour costs and inflationary pressure.
- In addition to the lack of wage and inflationary pressures, policymakers are evidently concerned about the bleak prospects for the Eurozone. These factors will maintain the dovish stance of the MPC in the medium term.
- The continuing repair of public and private sector balance sheets leave them sensitive to higher interest rates. The MPC clearly believes the appropriate level for Bank Rate for the post-crisis UK economy is significantly lower than the previous norm. We would suggest this is between 2.5 and 3.5%.
- While the ECB is likely to introduce outright QE, fears for the Eurozone are likely to maintain a safe haven bid for UK government debt, keeping gilt yields artificially low in the short term.
- The probability of potential upside risks crystallising have waned a little over the past two months. The primary upside risk is a swifter recovery in the Eurozone.

Forecast:

 Arlingclose continues to forecast the first rise in official interest rates in Q3 2015; general market sentiment is now close to this forecast. There is momentum in the economy, but inflationary pressure is benign and external risks have increased, reducing the likelihood of immediate monetary tightening.

- We project a slow rise in Bank Rate. The pace of interest rate rises will be gradual and the extent of rises limited; we believe the normalised level of Bank Rate post-crisis to range between 2.5% and 3.5%.
- The short run path for gilt yields is flatter due to the deteriorating Eurozone situation. We project gilt yields on an upward path in the medium term.

| | Dec-14 | Mar-15 | Jun-15 | Sep-15 | Dec-15 | Mar-16 | Jun-16 | Sep-16 | Dec-16 | Mar-17 | Jun-17 | Dec-17 | Mar-18 |
|--------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Official Bank Rate | | | | | | | | | | | | | |
| Upside risk | | 0.25 | 0.25 | 0.25 | 0.25 | 0.25 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 |
| Arlingclose Central Case | 0.50 | 0.50 | 0.50 | 0.75 | 0.75 | 1.00 | 1.00 | 1.25 | 1.25 | 1.50 | 1.50 | 1.75 | 1.75 |
| Downside risk | | | | 0.25 | 0.25 | 0.50 | 0.50 | 0.75 | 0.75 | 1.00 | 1.00 | 1.00 | 1.00 |
| 3-month LIBID rate | | | | | | | | | | | | | |
| Upside risk | 0.05 | 0.35 | 0.40 | 0.45 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 |
| Arlingclose Central Case | 0.55 | 0.60 | 0.65 | 0.85 | 1.00 | 1.15 | 1.30 | 1.45 | 1.60 | 1.75 | 1.85 | 2.05 | 2.15 |
| Downside risk | 0.10 | 0.15 | 0.20 | 0.30 | 0.40 | 0.55 | 0.65 | 0.75 | 0.85 | -0.95 | -0.95 | -0.95 | -1.00 |
| 1-yr LIBID rate | | | | | | | | | | | | | |
| Upside risk | 0.10 | 0.35 | 0.40 | 0.45 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 |
| Arlingclose Central Case | 0.95 | 1.00 | 1.05 | 1.20 | 1.35 | 1.50 | 1.65 | 1.80 | 1.95 | 2.10 | 2.20 | 2.40 | 2.50 |
| Downside risk | -0.30 | -0.35 | -0.40 | -0.45 | -0.50 | -0.55 | -0.60 | -0.65 | -0.70 | -0.75 | -0.80 | -0.80 | -0.80 |
| | 0.00 | 0.00 | 0.10 | 0.15 | 0.50 | 0.00 | 0.00 | 0.05 | 0.70 | 0.75 | 0.00 | 0.00 | 0.00 |
| 5-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.30 | 0.35 | 0.40 | 0.45 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.55 | 0.55 | 0.55 |
| Arlingclose Central Case | 1.70 | 1.75 | 1.90 | 2.00 | 2.10 | 2.20 | 2.30 | 2.40 | 2.50 | 2.60 | 2.70 | 2.90 | 2.95 |
| Downside risk | -0.30 | -0.35 | -0.35 | -0.35 | -0.40 | -0.45 | -0.50 | -0.55 | -0.60 | -0.65 | -0.70 | -0.70 | -0.70 |
| 10-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.30 | 0.35 | 0.40 | 0.45 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.55 | 0.55 | 0.55 |
| Arlingclose Central Case | 2.40 | 2.45 | 2.55 | 2.60 | 2.65 | 2.70 | 2.75 | 2.80 | 2.85 | 2.90 | 2.95 | 3.05 | 3.10 |
| Downside risk | -0.30 | -0.35 | -0.35 | -0.35 | -0.40 | -0.45 | -0.50 | -0.55 | -0.55 | -0.55 | -0.60 | -0.60 | -0.60 |
| 20-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.30 | 0.35 | 0.40 | 0.45 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.55 | 0.55 | 0.55 |
| Arlingclose Central Case | 2.90 | 2.95 | 3.05 | 3.10 | 3.15 | 3.20 | 3.25 | 3.30 | 3.35 | 3.40 | 3.45 | 3.50 | 3.55 |
| Downside risk | -0.30 | -0.35 | -0.35 | -0.35 | -0.40 | -0.45 | -0.50 | -0.50 | -0.55 | -0.55 | -0.60 | -0.60 | -0.60 |
| 50-yr gilt yield | | | | | | | | | | | | | |
| Upside risk | 0.30 | 0.35 | 0.40 | 0.45 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.50 | 0.55 | 0.55 | 0.55 |
| Arlingclose Central Case | 3.00 | 3.05 | 3.10 | 3.15 | 3.20 | 3.25 | 3.30 | 3.35 | 3.40 | 3.45 | 3.50 | 3.55 | 3.60 |
| Downside risk | -0.30 | -0.35 | -0.35 | -0.35 | -0.40 | -0.45 | -0.50 | -0.55 | -0.55 | -0.55 | -0.60 | -0.60 | -0.60 |