



# Treasury Management Strategy 2017-18



Northamptonshire  
County Council

# 1 Introduction

## **CIPFA Treasury Management in the Public Services: Code of Practice and Cross Sectoral Guidance Notes**

- 1.1 CIPFA has defined treasury management as “the management of the organisation’s investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”
- 1.2 The Council has adopted CIPFA’s Treasury Management in the Public Services: Code of Practice and Cross Sectoral Guidance Notes (the Treasury Code). The adoption is included in the Council’s Constitution at paragraph 7.7 of the Financial Procedure Rules.

## **CIPFA Prudential Code for Capital Finance in Local Authorities**

- 1.3 The CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code) is a professional code of practice. Local authorities have a statutory requirement to comply with the Prudential Code when making capital investment decisions and carrying out their duties under Part 1 of the Local Government Act 2003 (Capital Finance etc and Accounts).
- 1.4 The CIPFA Prudential Code sets out the manner in which capital spending plans should be considered and approved, and in conjunction with this, the requirement for an integrated treasury management strategy.
- 1.5 Councils are required to set and monitor a range of prudential indicators for capital finance, covering affordability, prudence, capital expenditure, external debt and treasury management, as well as a range of treasury indicators.

## **Treasury Management Policy Statement**

- 1.6 The Council’s Treasury Management Policy Statement is included in Appendix K-1. The policy statement follows the wording recommended by the latest edition of the CIPFA Treasury Code.

## **Treasury Management Practices**

- 1.7 The Council’s Treasury Management Practices (TMPs) set out the manner in which the Council will seek to achieve its treasury management policies and objectives, and how it will manage and control those activities.
- 1.8 The Council’s TMPs Schedules cover the detail of how the Council will apply the TMP Main Principles in carrying out its operational treasury activities. They are reviewed annually and approved by the Council’s Chief Finance Officer

## **The Treasury Management Strategy**

- 1.9 It is a requirement under the Treasury Code to produce an annual strategy report on proposed treasury management activities for the year.
- 1.10 The Council's Treasury Management Strategy is drafted in the context of the key principles of the Treasury Code, as follows:
- 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.
- 1.11 The purpose of the Treasury Management Strategy is to establish the framework for the effective and efficient management of the Council's treasury management activity, including the Council's investment portfolio, within legislative, regulatory, and best practice regimes, and balancing risk against reward in the best interests of stewardship of the public purse.
- 1.12 The Treasury Management Strategy incorporates:
- The Council's capital financing and borrowing strategy for the coming year
  - The Council's policy on the making of Minimum Revenue Provision (MRP) for the repayment of debt, as required by the Local Authorities (Capital Finance & Accounting) (Amendments) (England) Regulations 2008.
  - The Affordable Borrowing Limit as required by the Local Government Act 2003.
  - The Annual Investment Strategy for the coming year as required by the CLG revised Guidance on Local Government Investments issued in 2010.
- 1.13 The strategy takes into account the impact of the Council's Medium Term Financial Plan (MTFP), its revenue budget and capital programme, the balance sheet position and the outlook for interest rates.

- 1.14 The Treasury Management Strategy for 2017-18 also includes the Council's:
- Policy on borrowing in advance of need
  - Counterparty creditworthiness policies
- 1.15 The main changes from the Treasury Management Strategy adopted in 2016-17 are:
- Updates to interest rate forecasts
  - Updates to debt financing budget forecasts
  - Updates to Prudential and Treasury Indicators
- 1.16 The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. The Treasury Management Scheme of Delegation is shown in Appendix K-2.

## 2 Current Treasury Management Position

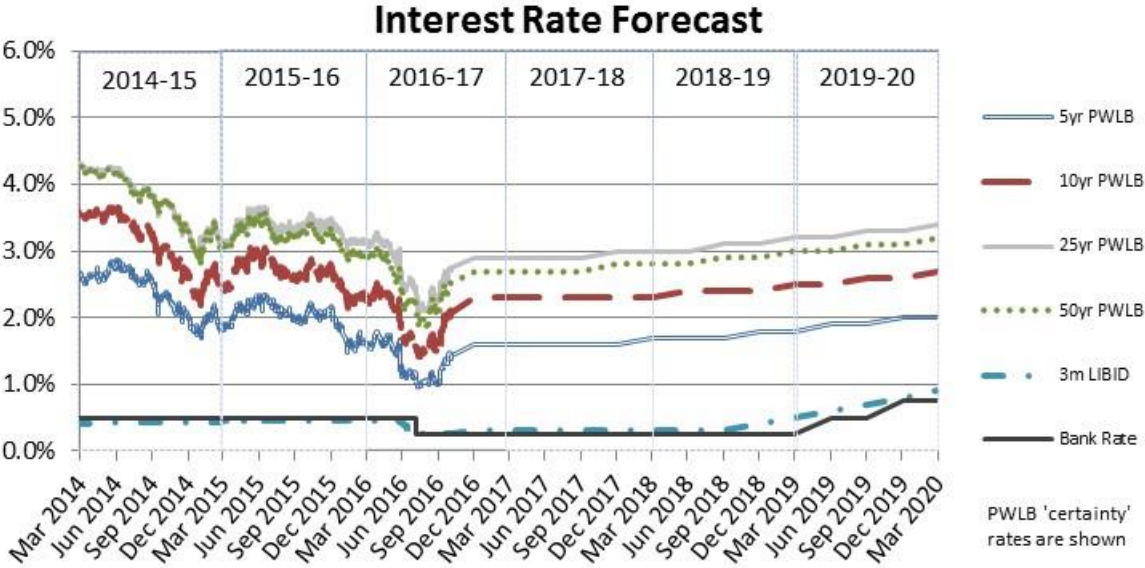
- 2.1 The Council's treasury portfolio position at 31 March 2017, with forward projections is summarised below. The table shows the actual external borrowing (the treasury management operations), against the capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing. This is shown in graphical form in Appendix K-6. The CFR and borrowing figures include borrowing undertaken or planned for third party loans.

£m	2016-17 Projected	2017-18 Estimate	2018-19 Estimate	2019-20 Estimate	2020-21 Estimate	2021-22 Estimate
<b>External borrowing</b>						
Borrowing at 1 April	455	500	545	552	552	552
Expected change in borrowing	45	45	7	0	0	-12
<b>Actual borrowing at 31 March</b>	<b>500</b>	<b>545</b>	<b>552</b>	<b>552</b>	<b>552</b>	<b>540</b>
<b>CFR – the borrowing need</b>	<b>662</b>	<b>697</b>	<b>699</b>	<b>696</b>	<b>692</b>	<b>680</b>
<b>Under / (over) borrowing</b>	<b>162</b>	<b>152</b>	<b>147</b>	<b>143</b>	<b>139</b>	<b>139</b>
<b>Total investments at 31 March</b>						
<b>Investments</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Investment change	-48	1	0	0	0	0
<b>Net borrowing</b>	<b>501</b>	<b>545</b>	<b>552</b>	<b>553</b>	<b>553</b>	<b>541</b>

- 2.2 Within the set of prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well defined limits. One of these is that the Council needs to ensure that its gross borrowing does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for the current and next two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes except to cover short term cash flows.
- 2.3 The S151 Officer reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

**3 Prospects for Interest Rates**

- 3.1 The Council has appointed Capita Asset Services (CAS) as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. The following graph gives the CAS central view for short term (Bank Rate) and longer fixed interest rates.



- 3.2 The Monetary Policy Committee, (MPC), cut Bank Rate from 0.50% to 0.25% on 4th August in order to counteract what it forecast was going to be a sharp slowdown in growth in the second half of 2016. It also gave a strong steer that it was likely to cut Bank Rate again by the end of the year. However, economic data since August has indicated much stronger growth in the second half 2016 than that forecast; also, inflation forecasts have risen substantially as a result of a continuation of the sharp fall in the value of sterling since early August. Consequently, Bank Rate was not cut again in November and, on current trends, it now appears unlikely that there will be another cut, although that cannot be completely ruled out if there was a significant dip downwards in economic growth. During the two-year period 2017 – 2019, when the UK is negotiating the terms for withdrawal from the EU, it is likely that the MPC will do nothing to dampen growth

prospects, (i.e. by raising Bank Rate), which will already be adversely impacted by the uncertainties of what form Brexit will eventually take. Accordingly, a first increase to 0.50% is not tentatively pencilled in, as in the table above, until quarter 2 2019, after those negotiations have been concluded, (though the period for negotiations could be extended). However, if strong domestically generated inflation, (e.g. from wage increases within the UK), were to emerge, then the pace and timing of increases in Bank Rate could be brought forward.

- 3.3 Economic and interest rate forecasting remains difficult with so many external influences weighing on the UK. The above forecasts, (and MPC decisions), will be liable to further amendment depending on how economic data and developments in financial markets transpire over the next year. Geopolitical developments, especially in the EU, could also have a major impact. Forecasts for average investment earnings beyond the three-year time horizon will be heavily dependent on economic and political developments.
- 3.4 The overall longer run trend is for gilt yields and PWLB rates to rise, albeit gently. It has long been expected that at some point, there would be a start to a switch back from bonds to equities after a historic long term trend over about the last twenty five years of falling bond yields. The action of central banks since the financial crash of 2008, in implementing substantial quantitative easing purchases of bonds, added further impetus to this downward trend in bond yields and rising prices of bonds. The opposite side of this coin has been a rise in equity values as investors searched for higher returns and took on riskier assets. The sharp rise in bond yields since the US Presidential election, has called into question whether, or when, this trend has, or may, reverse, especially when America is likely to lead the way in reversing monetary policy. Until 2015, monetary policy was focused on providing stimulus to economic growth but has since started to refocus on countering the threat of rising inflationary pressures as strong economic growth becomes more firmly established. The expected substantial rise in the Fed. rate over the next few years may make holding US bonds much less attractive and cause their prices to fall, and therefore bond yields to rise. Rising bond yields in the US would be likely to exert some upward pressure on bond yields in other developed countries but the degree of that upward pressure is likely to be dampened by how strong, or weak, the prospects for economic growth and rising inflation are in each country, and on the degree of progress in the reversal of monetary policy away from quantitative easing and other credit stimulus measures.
- 3.5 PWLB rates and gilt yields have been experiencing exceptional levels of volatility that have been highly correlated to geo-political, sovereign debt crisis and emerging market developments. It is likely that these exceptional levels of volatility could continue to occur for the foreseeable future.
- 3.6 The overall balance of risks to economic recovery in the UK is to the downside, particularly in view of the current uncertainty over the final terms of Brexit and the timetable for its implementation.

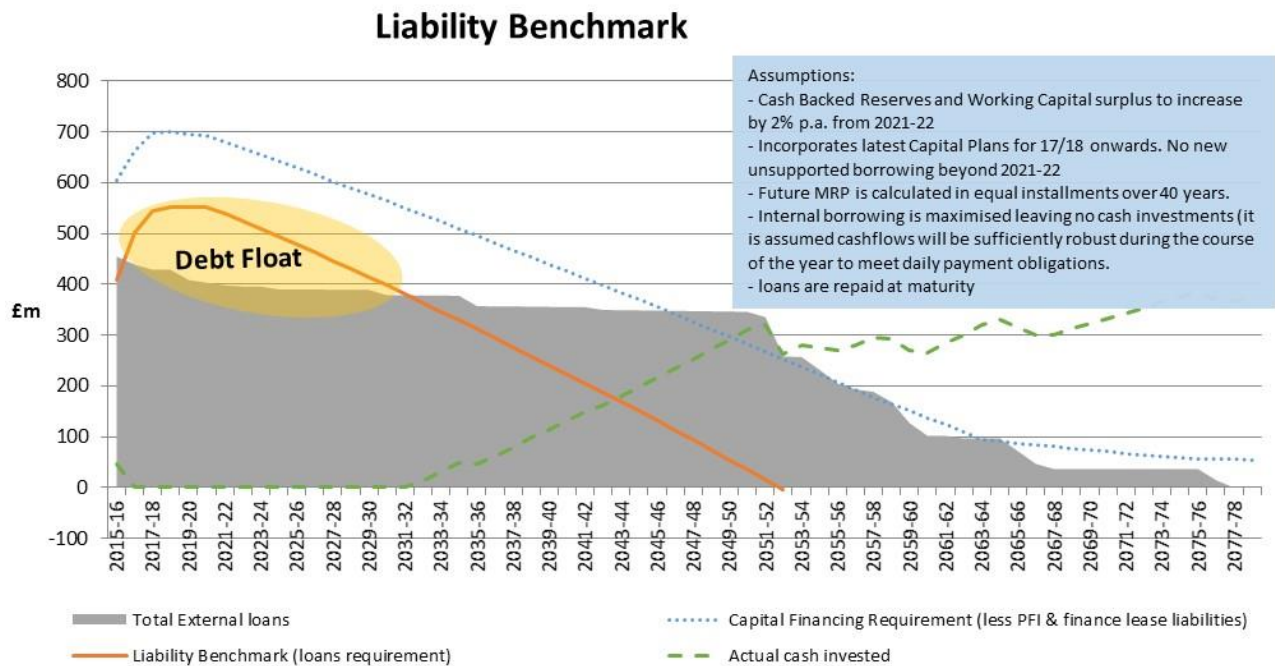
- 3.7 This challenging and uncertain economic outlook has several key treasury management implications:
- Investment returns are likely to remain relatively low during 2017-18 and beyond;
  - Borrowing interest rates have been on a generally downward trend during most of 2016 up to mid-August; they fell sharply to historically phenomenally low levels after the referendum and then even further after the MPC meeting of 4th August when a new package of quantitative easing purchasing of gilts was announced. Gilt yields have since risen sharply due to a rise in concerns around a 'hard Brexit', the fall in the value of sterling, and an increase in inflation expectations. The policy of avoiding new borrowing by running down spare cash balances, has served well over the last few years. However, this needs to be carefully reviewed to avoid incurring higher borrowing costs in later times when authorities will not be able to avoid new borrowing to finance capital expenditure and/or to refinance maturing debt;
  - There will remain a cost of carry to any new borrowing which causes an increase in investments as this will incur a revenue cost between borrowing costs and investment returns.

## **4 Borrowing Strategy**

- 4.1 The overarching objectives for the borrowing strategy are as follows:
- To manage the Council's debt maturity profile, leaving no one future year with a disproportionate level of repayments.
  - To maintain a view on current and possible future interest rate movements, and to plan borrowing accordingly.
  - To monitor and review the balance between fixed and variable rate loans against the background of interest rates and the Prudential Indicators.
  - Reduce reliance on the PWLB as a source of funding and review all alternative options available, including forward loan agreements.
  - Support the launch of the UK Municipal Bonds Agency (MBA), as shareholder, and its bond issuance programme.
  - Provide value for money and savings where possible to meet budgetary pressures.
- 4.2 The Council is currently maintaining an under borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent while investment returns are low and counterparty risk remains elevated.
- 4.3 The under/internal borrowing position has been maximised during 2016-17, which has resulted in an optimum treasury portfolio generating revenue savings whilst reducing credit risk. Looking forward, projections show that the CFR is

increasing over the next 2 – 3 years. At the same time cash backed reserves and balances are projected to fall, therefore new loans, which have been budgeted for, will be required to maintain sufficient operational cash resources.

- 4.4 To assist with its long term treasury management strategy, the Council has created a Liability Benchmark, which forecasts the Council’s need to borrow over the long term assuming cash balances are kept to a minimum.
- 4.5 The chart suggests the Council will have an increasing borrowing requirement over the next 3 – 4 years but after that borrowing needs fall (referred in the chart as the area called the debt float). This implies that the loans raised will need to be short/medium term in nature, subject to developments in the interest rate environment.



- 4.6 Given that short term interest rates are significantly lower than long term interest rates and this position is set to remain this way for some years to come it is more cost efficient in the short term to combine the use of internal resources with short term borrowing. However, the decision to raise short dated loans to generate short term savings will be evaluated against the potential for incurring additional long term borrowing costs in future years when long term interest rates are forecast to be higher.
- 4.7 Sources of finance include loans from other local authorities, the PWLB and the newly formed UK Municipal Bonds Agency, as well as other financial institutions, banks and building societies.
- 4.8 Against this background and the risks within the economic forecast, caution will be adopted with the 2017-18 treasury operations. The S151 Officer will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances.



## **Prudential & Treasury Indicator**

- 4.9 There is a requirement under the Local Government Act 2003 for local authorities to have regard to CIPFA's Prudential Code for Capital Finance in Local Authorities (the "CIPFA Prudential Code") when setting and reviewing their Prudential Indicators. The Prudential Code for Capital Finance in Local Authorities was updated in 2011.
- 4.10 A full set of Prudential Indicators and borrowing limits are shown in Appendix K-3.

## **Policy on Borrowing in Advance of Need**

- 4.11 The Council will not borrow more than or in advance of its needs, purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.
- 4.12 Borrowing in advance will be made within the following constraints:

<b>Year</b>	<b>Max. Borrowing in advance</b>	<b>Notes</b>
2016-17	100%	Borrowing in advance will be limited to no more than the expected increase in borrowing need (CFR) over the period of the approved Medium Term Capital Programme, a maximum of 3 years in advance.
2017-18	50%	
2018-19	25%	

- 4.13 Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the Council's reporting mechanism for treasury management and capital financing matters.

## **Debt Rescheduling**

- 4.14 As short term borrowing rates will be considerably cheaper than longer term fixed interest rates, there may be potential opportunities to generate savings by switching from long term borrowing to short term borrowing. However, these savings will need to be considered in the light of the current treasury position and the size of the cost/benefit of any debt repayment (premiums and discounts included).
- 4.15 The reasons for any rescheduling to take place will include:
- the generation of cash savings and/or discounted cash flow savings;
  - helping to fulfil the treasury strategy; and
  - enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).

- 4.16 Consideration will also be given to identifying whether there is any residual potential for making savings by running down investment balances to repay debt prematurely as short term rates on investments are likely to be lower than rates paid on current debt.
- 4.17 All rescheduling will be reported to the Cabinet, at the next quarterly report following its action.

## **5 Minimum Revenue Provision**

- 5.1 The Council is required to repay an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).
- 5.2 CLG Regulations have been issued which require full Council to approve an MRP Statement in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision. The Council is recommended to approve the MRP Policy in Appendix K-4.
- 5.3 The Council, in conjunction with its Treasury Management advisors, has considered the MRP policy to be prudent.

## **6 Investment Strategy**

- 6.1 Government guidance on Local Government Investments in England requires that an Annual Investment Strategy (AIS) be set. The Guidance permits the Treasury Management Strategy Statement (TMSS) and the AIS to be combined into one document.
- 6.2 The Council's general policy objective is to invest its surplus funds prudently. Due to the ongoing uncertainty in the banking sector which has seen institutions fold, it is now felt more appropriate to focus on the safe return of the sums invested. As such the Council's investment priorities in priority order are:
- security of the invested capital;
  - liquidity of the invested capital; and
  - the yield received from the investment.
- 6.3 A copy of the Council's Investment Strategy is shown in Appendix K-5.

## **7 Sensitivity of Forecasts and Risk Analysis**

### **Risk Management**

7.1 The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Treasury management risks are identified in the Council's approved Treasury Management Practices. The main risks to the treasury activities are:

- Credit and counterparty risk (security of investments)
- Liquidity risk (adequacy of cash resources)
- Interest rate risk (fluctuations in interest rate levels)
- Exchange rate risk (fluctuations in exchange rates)
- Refinancing risks (impact of debt maturing in future years)
- Legal and regulatory risk (non-compliance with statutory and regulatory requirements)
- Fraud, error and corruption, and contingency management (in normal and business continuity situations)
- Market risk (fluctuations in the value of principal sums)

7.2 The TMP Schedules set out the ways in which the Council seeks to mitigate these risks. Examples are the segregation of duties (to counter fraud, error and corruption), and the use of creditworthiness criteria and counterparty limits (to minimise credit and counterparty risk). Council officers, in conjunction with the treasury advisers, will monitor these risks closely.

### **Sensitivity of the Forecast**

7.3 The sensitivity of the forecast is linked primarily to movements in interest rates and in cash balances, both of which can be volatile. Interest rates in particular are subject to global external influences over which the Council has no control. In terms of interest rates, with the forecast average investment portfolio of £37m for 2017-18, each 0.1% increase or decrease in investment rates equates to £37k revenue impact.

7.4 Both interest rates and cash balances will be monitored closely throughout the year and potential impacts on the Council's debt financing budget will be assessed. Action will be taken as appropriate, within the limits of the TMP Schedules and the treasury strategy, and in line with the Council's risk appetite, to keep negative variations to a minimum. Any significant variations will be reported to Cabinet as part of the Council's regular budget monitoring arrangements.

## 8 Reporting Arrangements

8.1 In line with Code full Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals. These reports are:

**a) Annual Treasury Management Strategy**

- the capital plans (including prudential indicators);
- a Minimum Revenue Provision Policy (how residual capital expenditure is charged to revenue over time);
- the Treasury Management Strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

**b) Treasury Management Mid Year Report**

This will update members with the progress of the capital position, amending prudential indicators as necessary, and indicating whether the agreed treasury strategy is meeting the Council's stated capital financing objectives, or whether any policies require revision.

**c) Treasury Management Outturn Report**

This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

8.2 In addition, Cabinet will receive quarterly **Monitoring Reports**. The second and fourth quarter report will go to full Council as described above. The quarterly reports will be subject to the Council's Scrutiny process.

## 9 Treasury Management Budget

9.1 The table below provides a breakdown of the treasury management budget.

	2017-18	2018-19	2019-20	2020-21	2021-22
	£m	£m	£m	£m	£m
Interest payable	19.421	19.596	19.569	19.005	19.425
Interest receivable	-0.094	-0.282	-0.447	-0.599	-0.820
Technical Adjustments & MRP	10.140	11.501	11.351	11.958	12.157
Service contributions	-0.031	-0.031	-0.031	-0.031	0.000
Other (inc capitalised interest)	-0.436	-0.283	0.057	0.168	0.238
<b>Total</b>	29.000	30.500	30.500	30.500	31.000

9.2 Assumptions behind the 2017-18 Budget:

- Average rates achievable on investments will be 0.25%;
- New and replacement borrowing to fund the capital programme will be predominantly financed by short term loans at a rate 1.5%;

- The MRP charge is in line with the Council's MRP policy.

## **10 Policy on the use of External Service Providers**

- 10.1 The Council's treasury management advisor is Capita Asset Services (CAS). CAS was awarded a 2 year contract following a formal joint procurement exercise with other LGSS authorities during 2016-17.
- 10.2 The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.
- 10.3 It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

## **11 Future Developments**

- 11.1 Local Authorities are having to consider innovative strategies towards improving service provision to their communities. This approach to innovation also applies to councils' treasury management activities. The Government is introducing new statutory powers and policy change which will have an impact on treasury management approaches in the future. Examples of such changes are:

### **Localism Act**

- 11.2 A key element of the Act is the "General Power of Competence": "A local authority has power to do anything that individuals generally may do." The Act opens up the possibility that a local authority can use derivatives as part of their treasury management operations. However the legality of this has not yet been tested in the courts even though CIPFA have set out a framework of principles for the use of derivatives in the Treasury Management Code and guidance notes. The Council has no plans at this point to use financial derivatives under the powers contained within this Act.

### **Loans to Third Parties**

- 11.3 The Council may borrow to make grants or loans to third parties for the purpose of capital expenditure, as allowable under paragraph 25 (1) (b) of the Local Authorities (Capital Financing and Accounting) (England) Regulations 2003 (Statutory Instrument No. 3146). This will usually be to support local economic development, and may be funded by external borrowing.
- 11.4 The following key projects in this respect are under way or in the pipeline. These are:

- University of Northampton Energy Centre Loan – An additional £8m loan, fully guaranteed by the UK Government to facilitate the construction of an Energy Centre to provide services to the Waterside Campus.

### **UK Municipal Bonds Agency**

- 11.5 The Agency raised £6m share capital from 56 local authorities, including Northamptonshire County Council, plus the Local Government Association to launch the UK Municipal Bonds Agency.
- 11.6 The purpose of the Agency is to issue bonds in the capital markets on behalf of local authorities across the country and at lower rates than available from the PWLB.
- 11.7 Following completion of Framework Agreement, which sets out the relationship between the Agency and local authority borrowers, including the joint and several guarantee, the Agency now stands ready to start bond issuance. This council has committed to be part of the first bond issuance to raise a small amount of borrowing during 2016-17.

## **12 Training**

- 12.1 A key outcome of investigations into local authority investments following the credit crisis has been an emphasis on the need to ensure appropriate training and knowledge in relation to treasury management activities, for officers employed by the Council, in particular treasury management staff, and for members charged with governance of the treasury management function.
- 12.2 Capita Asset Services run training events regularly which are attended by the Treasury Team. In addition members of the team attend national forums and practitioner user groups.
- 12.3 Treasury Management training for committee members will be delivered as required to facilitate informed decision making and challenge processes. A training session which was open to all members of the Council was delivered in conjunction with the Council's external advisors in November 2015.

## **13 List of Appendices**

- Appendix K-1: Treasury Management Policy Statement
- Appendix K-2: Treasury Management Scheme of Delegation and Role of Section 151 Officer
- Appendix K-3: Prudential & Treasury Indicators
- Appendix K-4: Minimum Revenue Provision (MRP) Policy Statement
- Appendix K-5: Annual Investment Strategy
- Appendix K-6: Net Borrowing Graph



## **Treasury Management Policy Statement**

This organisation defines its treasury management activities as:

“The management of the organisation’s investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

This organisation regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the organisation, and any financial instruments entered into to manage these risks.

This organisation acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.



## **Treasury Management Scheme of Delegation and Role of Section 151 Officer**

### **The Scheme of Delegation**

#### **Full Council**

Approval of annual strategy and mid year update to the Strategy.  
Approval of the annual Treasury Management report.  
Approval of the Treasury Management budget.

#### **Cabinet**

Approval of the Treasury Management quarterly update reports.  
Approval of the Treasury Management outturn report.

#### **Scrutiny Committee**

Scrutiny of performance against the Strategy.

### **The Treasury Management Role of the Section 151 Officer**

The S151 (responsible) officer:

- recommending clauses, Treasury Management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- submitting regular Treasury Management policy reports;
- submitting budgets and budget variations;
- receiving and reviewing management information reports;
- reviewing the performance of the Treasury Management function;
- ensuring the adequacy of Treasury Management resources and skills, and the effective division of responsibilities within the Treasury Management function;
- ensuring the adequacy of internal audit, and liaising with external audit; and
- recommending the appointment of external service providers.

## Prudential and Treasury Indicators

### 1 The Capital Prudential Indicators

- 1.1 The Council's capital expenditure plans are the key driver of Treasury Management activity. The output of the capital expenditure plans are reflected in prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.
- 1.2 **Capital Expenditure.** This prudential Indicator shows the Council's capital expenditure plans; both those agreed previously, and those forming part of this budget cycle. Capital expenditure excludes spend on PFI and leasing arrangements, which are now shown on the balance sheet.
- 1.3 The table below summarises the net funding need (borrowing) of the capital expenditure plans for the Council. Third party loans, classified as capital expenditure, are included within the expenditure.

Capital Expenditure	2016-17 Forecast	2017-18 Estimate	2018-19 Estimate	2019-20 Estimate	2020-21 Estimate	2021-22 Estimate
	£m	£m	£m	£m	£m	£m
<b>Net financing need for the year</b>	<b>66.6</b>	<b>45.0</b>	<b>13.6</b>	<b>8.2</b>	<b>8.3</b>	<b>0.0</b>

- 1.4 **The Council's Borrowing Need (the Capital Financing Requirement).** The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is the total historical outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is a measure of the Council's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for, will increase the CFR.
- 1.5 Following accounting changes the CFR includes any other long term liabilities (e.g. PFI schemes, finance leases) brought onto the balance sheet. Whilst this increases the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility and so the Council is not required to separately borrow for these schemes. The CFR below is shown net of these liabilities.

	2016-17 Forecast	2017-18 Estimate	2018-19 Estimate	2019-20 Estimate	2020-21 Estimate	2021-22 Estimate
	£m	£m	£m	£m	£m	£m
<b>Capital Financing Requirement</b>						
<b>Total CFR</b>	<b>662.2</b>	<b>697.0</b>	<b>699.3</b>	<b>695.7</b>	<b>691.9</b>	<b>679.5</b>
<b>Movement in CFR</b>	<b>58.1</b>	<b>34.8</b>	<b>2.2</b>	<b>-3.6</b>	<b>-3.8</b>	<b>-12.4</b>

<b>Movement in CFR represented by</b>						
Net financing need for the year (above)	66.6	45.0	13.6	8.2	8.3	0.0
Less Capital Receipts to repay borrowing	0.0	0.0	0.0	0.0	0.0	0.0
Less MRP and other financing movements	8.5	10.1	11.3	11.8	12.1	12.4
<b>Movement in CFR</b>	<b>58.1</b>	<b>34.8</b>	<b>2.2</b>	<b>-3.6</b>	<b>-3.8</b>	<b>-12.4</b>

- 1.6 **The Operational Boundary.** This is the limit beyond which external borrowing is not normally expected to exceed. All things being equal, this could be a similar figure to the CFR, but may be lower or higher depending on the levels of actual borrowing undertaken as impacted by the level of current and future cash resources and the shape of the interest rate yield curve.

<b>Operational Boundary</b>	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
	£m	£m	£m	£m	£m	£m
<b>Total Borrowing</b>	698.7	727	729	726	722	710

- 1.7 **The Authorised Limit for external borrowing.** A further key prudential indicator represents a control on the maximum level of borrowing. This represents a limit beyond which external borrowing is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external borrowing which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

- This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.
- The Council is asked to approve the following Authorised Limit (excluding PFI and Finance Lease Financing arrangements):

<b>Authorised Limit</b>	2016-17	2017-18	2018-19	2019-20	2020-21	2020-21
	£m	£m	£m	£m	£m	£m
<b>Total Borrowing</b>	728.7	757	759	756	752	740

## 2 Treasury Management Limits on Activity

2.1 There are three debt related treasury activity limits. The purpose of these are to contain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs or improve performance. The indicators are:

- Upper limits on variable interest rate exposure. This identifies a maximum limit for variable interest rates based upon the debt position net of investments.
- Upper limits on fixed interest rate exposure. This is similar to the previous indicator and covers a maximum limit on fixed interest rates;
- Maturity structure of borrowing. These gross limits are set to reduce the Council’s exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.

£m	2016-17	2017-18	2018-19	2019-20	2020-21
<b>Interest rate Exposures</b>					
	<b>Upper</b>	<b>Upper</b>	<b>Upper</b>	<b>Upper</b>	<b>Upper</b>
<b>Limits on fixed interest rates based on net debt</b>	150%	150%	150%	150%	150%
<b>Limits on variable interest rates based on net debt</b>	65%	65%	65%	65%	65%

The Interest rate exposure is calculated as a percentage of net debt. Due to the mathematical calculation exposures could be greater than 100% or below zero (i.e. negative) depending on the component parts of the formula. The formula is shown below:

$$\frac{\text{Total Fixed (or Variable) rate exposure}}{\text{Total borrowing – total investments}}$$

Fixed rate calculation:

$$\frac{(\text{Fixed rate borrowing – Fixed rate investments}^*)}{\text{Total borrowing – Total investments}}$$

\*defined as greater than 1 year to run

Variable rate calculation:

$$\frac{(\text{Variable rate borrowing}^{**} – \text{variable rate investments}^{**})}{\text{Total borrowing – Total investments}}$$

\*\* Defined as less than 1 year to run to maturity, or in the case of LOBO borrowing, the call date falling within the next 12 months.

Maturity Structure of borrowing 2017-18			
	Lower	Upper	Actual Sept 2016
Under 12 months	0%	80%	23%
12 months to 2 years	0%	50%	2%
2 years to 5 years	0%	50%	10%
5 years to 10 years	0%	50%	2%
10 years and above	0%	100%	63%

The Treasury Management Code of Practice Guidance notes requires that maturity is determined by the earliest date on which the lender can require repayment, which in the case of LOBO loans is the next break point. This indicator represents the borrowing falling due in each period expressed as a percentage of total borrowing.

## 2.2 Affordability Prudential Indicators

2.3 The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators:

2.4 **Actual and estimates of the ratio of financing costs to net revenue stream.** This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream. The estimates of financing costs include current commitments and the proposals in this budget report.

2.5 This is calculated as the estimated net financing costs for the year divided by the amounts to be met from government grants and local tax payers (described in the budget report as the net budget requirements).

2016-17 Forecast	2017-18 Estimate	2018-19 Estimate	2019-20 Estimate	2020-21 Estimate	2021-22 Estimate
6.4%	7.1%	7.4%	7.2%	7.1%	7.2%

2.6 **Estimates of the incremental impact of capital investment decisions on council tax.** This indicator identifies the revenue costs associated with proposed changes to the capital programme recommended in this budget report compared to the Council's existing approved commitments and current plans. The assumptions are based on the budget, but will invariably include some estimates, such as the level of Government support, which are not published over the budget planning period.

**2.7 Incremental impact of capital investment decisions on the band D council tax**

<b>2016-17 Forecast</b>	<b>2017-18 Estimate</b>	<b>2018-19 Estimate</b>	<b>2019-20 Estimate</b>	<b>2020-21 Estimate</b>	<b>2021-22 Estimate</b>
(£24.30)	(£3.22)	£6.32	£0.00	£0.0	£2.05

2.8 In addition the Council sets a local affordability indicator. Further information on the Golden Rule can be found in the Capital Strategy which sets a limit on the annual discretionary capital financing costs as a percentage of net revenue budget.

## Minimum Revenue Provision Policy Statement

### 1 Policy Statement

- 1.1 The Council implemented the new Minimum Revenue Provision (MRP) guidance in 2008-09, and will assess its MRP for 2016-17 in accordance with the main recommendations contained within the guidance issued by the Secretary of State under section 21 (1A) of the Local Government Act 2003.
- 1.2 The historical debt liability will be charged on an annuity basis over 50 years. Up until 2014-15 this element of the charge was calculated using Option 1 of the Guidance the Regulatory Method, which based the calculation on 4% of the CFR, amended for Adjustment A, on a reducing balance basis. During 2015-16 full Council approved the change in policy following a need to address significant budget pressures arising due to loss of grant funding and ongoing changes to the local government funding system.
- 1.3 Certain expenditure reflected within the debt liability at 31<sup>st</sup> March 2017 will under delegated powers be subject to MRP under Option 3, which will be charged over a period which is reasonably commensurate with the estimated useful life applicable to the nature of expenditure, using the annuity method. For example, capital expenditure on a new building, or on the refurbishment or enhancement of a building, will be related to the estimated life of that building.
- 1.4 Whilst the Council currently uses Option 3 as the method of calculation for any expenditure post 2007-08 it retains the option to change the method which it uses in the future to calculate MRP in order to ensure that the charge for the tax payer is prudent.
- 1.5 Estimated life periods will be determined under delegated powers. To the extent that expenditure is not on the creation of an asset and is of a type that is subject to estimated life periods that are referred to in the guidance, these periods will generally be adopted by the Council. However, the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.
- 1.6 As some types of capital expenditure incurred by the Council are not capable of being related to an individual asset, asset lives will be assessed on a basis which most reasonably reflects the anticipated period of benefit that arises from the expenditure. Also, whatever type of expenditure is involved, it will be grouped together in a manner which reflects the nature of the main component of expenditure with substantially different useful economic lives.
- 1.7 **Non-operational assets** – The Council will not charge MRP on its non operational assets. MRP will only be charged in the financial year following the asset becoming operational. This policy will be reviewed annually.

- 1.8 **Use of Capital Receipts** – The Council may use capital receipts in the year in which they are received to offset the MRP charge for that year. Any unapplied capital receipts will be available in future years and will be applied in a prudent manner.
- 1.9 **Private Finance Initiatives (PFI) and Finance Leases** - Any PFI or finance lease that comes onto the balance sheet via the introduction of the new International Financial Report Standards will already have taken capital financing into account as part of their revenue charges. For this reason they will be excluded from MRP calculations. Prudential indicators will be shown “net of PFI and finance leases”.
- 1.10 **Third party loans** – Under statute the payment of the loan will be treated as capital expenditure. The expenditure will be funded from the capital which will be treated as a capital receipt. As a result MRP will not generally be charged on the loan as it is not appropriate to do so.
- 1.11 **Capitalisation of Interest** - MRP will be charged on capitalised interest in line with the Interest Capitalisation policy of the Council.
- 1.12 **Borrowing to Fund Assets with Guaranteed Future Income Streams** - One new potential funding source for capital projects identified by central government is tax increment financing (TIF) where future NNDR tax streams from new developments could be used to initially fund those new developments.
- 1.13 This type of capital expenditure will be financed from future income streams. MRP will not be charged on any cash flow borrowing required to fund expenditure up front where TIF provides a guaranteed future income stream.
- 1.14 **Revenue Funded from Capital Under Statute (REFCUS)** - REFCUS will be treated in the same way as other capital expenditure for the purposes of charging MRP, and will be charged based on the estimated useful life of the asset.



## Annual Investment Strategy

### 1 Investment Policy

- 1.1 The Council's investment policy has regard to the CLG's Guidance on Local Government Investments ("the Guidance") and the 2011 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). The Council's investment priorities will be security first, liquidity second, and then return.
- 1.2 Investment instruments identified for use in the financial year are listed in section 3.20 under the 'Specified' and 'Non-Specified' Investments categories. Counterparty limits will be as set through the Council's Treasury Management Practices – Schedules.
- 1.3 The use of Credit Ratings:
- The Council has established the minimum long-term/short-term and other credit ratings it considers appropriate for each category of investment. Please see specified and non-specified investments in Section 8 for further details.
  - Building Societies who do not have a colour rating assigned Capita Asset Services will be assessed on the size of their asset base. Any Building Society with an asset base in excess of £2billion will be included, but will be deemed a non-specified investment. Currently Nationwide is the only building society that meets this criterion.

### 2 Creditworthiness Policy

- 2.1 The Council applies the creditworthiness service provided by Capita Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moodys and Standard and Poors. The credit ratings of counterparties are supplemented with the following overlays:
- credit watches and credit outlooks from credit rating agencies;
  - credit default swap (CDS) spreads to give early warning of likely changes in credit ratings; and
  - sovereign ratings to select counterparties from only the most creditworthy countries.
- 2.2 This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative credit worthiness of counterparties. These colour codes are

used by the Council to determine the duration for investments. The Council will therefore use counterparties within the following durational bands provided they meet the minimum sovereign rating described in section 3:

- |             |   |
|-------------|---|
| • Yellow    | • 5 years   |
| • Purple    | • 2 years   |
| • Blue      | • 1 year (only applies to nationalised or semi nationalised UK Banks) |
| • Orange    | • 1 year  |
| • Red       | • 6 months  |
| • Green     | • 100 days  |
| • No Colour | • not to be used  |

- 2.3 The Capita Asset Services creditworthiness service uses a wider array of information than just primary ratings and by using a risk weighted scoring system, does not give undue preponderance to just one agency's ratings.
- 2.4 All credit ratings will be monitored daily. The Council is alerted to changes to ratings of all three agencies through its use of the Capita Asset Services credit worthiness service.
- if a downgrade results in the counterparty or investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
  - in addition to the use of credit ratings the Council will be advised of information in movements in Credit Default Swap against the iTraxx benchmark and other market data on a weekly basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.
- 2.5 Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, information on government support for banks and the credit ratings of that government support.
- 2.6 The Chief Finance Officer has discretion during the year to lift or increase the restrictions on the counterparty list and or to adjust the associated lending limits on values and periods should it become necessary, to enable the effective management of risk in relation to its investments.

### **3 Sovereign Limits**

- 3.1 Expectation of implicit sovereign support for banks and financial institutions in extraordinary situations has lessened considerably in the last couple of years, and alongside that, changes to banking regulations have focussed on improving the banking sectors resilience to financial and economic stress.

- 3.2 The Council has determined that for 2017-18 it will only use approved counterparties from overseas countries with a sovereign credit rating from the three main ratings agencies that is equal to or above AA-. Banks domiciled in the UK are exempt from this minimum sovereign credit rating, so may be used if the sovereign rating of the UK falls below AA-.
- 3.3 The list of countries that qualify using these credit criteria as at the date of this report are shown below. This list will be amended by officers should ratings change in accordance with this policy.

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

## 4 Banking Services

- 4.1 The Council will continue to use its own bankers for short term liquidity requirements if the credit rating of the institution falls below the minimum credit criteria. A pragmatic approach will be adopted and monitored closely.

## 5 Investment Position and Use of Council's Resources

- 5.1 The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year end balances.

<b>Year End Resources</b>	<b>2016-17 Forecast</b>	<b>2017-18 Estimate</b>	<b>2018-19 Estimate</b>	<b>2019-20 Estimate</b>	<b>2020-21 Estimate</b>	<b>2021-22 Estimate</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
Fund balances/ reserves	46	36	31	27	24	23
Provisions & Other	54	54	54	54	54	54
<b>Total core funds</b>	<b>100</b>	<b>90</b>	<b>85</b>	<b>81</b>	<b>78</b>	<b>77</b>
Working capital surplus	62	62	62	62	62	62
Under/(over) borrowing	162	152	147	143	139	139
<b>Expected investments</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

- 5.2 Investments will be made with reference to the core balances and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months).
- 5.3 The Council is asked to approve the following treasury indicator and limit ‘total principal funds invested for greater than 364 days’. These limits are set with regard to the Council’s liquidity requirements and to reduce the need for early sale of an investment and are based on the availability of funds after each year-end. This indicator is calculated by adding together all investments which have greater than 364 days to run to maturity at a single point in time.
- 5.4 The Council is asked to approve the treasury indicator and limit: -

£m	Maximum principal sums invested > 364 days				
	2017-18	2018-19	2019-20	2020-21	2021-22
Principal sums invested > 364 days	0.0	0.0	0.0	0.0	0.0

The Council does not expect to have any investments that exceed 364 days.

- 5.5 For its cash flow generated balances, the Council will seek to utilise its business reserve accounts, notice accounts, money market funds and short-dated deposits (overnight to three months) in order to benefit from the compounding of interest.

**6 Specified Investments**

- 6.1 An investment is a specified investment if all of the following apply:
  - The investment is denominated in sterling and any payments or repayments in respect of the investment are payable only in sterling;
  - The investment is not a long term investment (i.e. up to 1 year);
  - The making of the investment is not defined as capital expenditure by virtue of regulation 25(1)(d) of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 [SI 3146 as amended];
  - The investment is made with a body or in an investment scheme of high credit quality (see below) or with one of the following public-sector bodies:
    - The United Kingdom Government;
    - A local authority in England or Wales (as defined under section 23 of the 2003 Act) or a similar body in Scotland or Northern Ireland; and
    - High credit quality is defined as a minimum credit rating as outlined in section 8.2 of this strategy.

## **7 Non Specified Investments**

7.1 Non-Specified investments are defined as those not meeting 6.1 above.

7.2 Lending to third parties

- The Council has the power to lend monies to third parties subject to a number of criteria. Any loans to or investments in third parties will be made under the Well Being powers of the Council conferred by section 2 of the Local Government Act 2000 or permitted under any other act.
- The Well Being power can be exercised for the benefit of some or all of the residents or visitors to a local authority's area. The power may also be used to benefit organisations and even an individual.
- Loans of this nature will be under exceptional circumstances. Loans above £2m will require Cabinet approval. The Section 151 Officer in conjunction with the lead member responsible for finance may approve loans to third parties below this £2m threshold.
- The primary aims of the Investment Strategy, in order of priority, are the security of its capital, liquidity of its capital and to obtain a return on its capital commensurate with levels of security and liquidity. These aims are crucial in determining whether to proceed with a potential loan.
- Recipients of this type of investment are unlikely to be a financial institution and therefore unlikely to be subject to a credit rating as outlined in section 3. In order to ensure security of the Authority's capital, extensive financial due diligence must be completed prior to any loan or investment being agreed. The Authority will use specialist advisors to complete financial checks to ascertain the creditworthiness of the third party. Where necessary additional guarantees will be sought. This will be via security against assets and/or through guarantees from a parent company.

## **8 The use of Specified and Non-Specified Investments**

8.1 Investment instruments identified for use in the financial year are as follows:

- The tables below set out the types of investments that fall into each category and the limits placed on each of these. A detailed list of each investment type is available in the Treasury Management Practices guidance notes.
- Maximum counterparty limits may be temporarily exceeded by small amounts and for very short periods where interest is added by the counterparty to the principal investment amount. In such instances the interest amounts will be withdrawn as soon as reasonably practicable.
- The counterparty limit with the Council's corporate bank (Barclays) may be breached on an overnight basis when cash surpluses are identified after the day's dealing position is closed. This occurs when the timing for

receipt of funds is uncertain, for example the sale of a property. In such instances funds will be withdrawn as soon as reasonably practicable.

## 8.2 Criteria for Specified Investments:

<b>Specified Investments</b>			
<b>Investment</b>	<b>Minimum Security / Credit Rating</b>	<b>Maximum Amount</b>	<b>Maximum Period</b>
Debt Management Agency Deposit Facility (DMADF)	Government backed	No maximum	6 months
UK Treasury Bills	Government backed	No maximum	9 months
UK Local Authorities	Government backed	£60m	1 year
Certificate of Deposit / Term Deposits (including callable deposits) All colours are as per Capita Asset Services matrix	Purple	£30m individual / £40m group	1 year
	Blue	£25m individual / £35m group	1 year
	Orange	£20m individual / £30m group	1 year
	Red	£15m individual / £25m group	6 months
	Green	£10m individual	100 days
	No Colour	Not to be used	N/A
UK Government Gilts	Government Backed	No maximum	1 year
Money Market Funds	AAA rated	£20m per fund / £60m total	Cash flow
Commercial Paper	F1 rated	-	9 months
Collective Investment Schemes	AA-	-	-
UK Bonds	Government Backed	£30m	1 year
Bonds (multilateral)	AAA	£30m	1 year

### 8.3 Criteria for Non Specified Investments:

<b>Non Specified Investments</b>			
<b>Investment</b>	<b>Minimum Security / Credit Rating</b>	<b>Maximum Amount</b>	<b>Maximum Period</b>
UK Government Gilts	Government backed	No maximum	5 years
UK Local Authorities	Government backed	£60m	5 years
Certificate of Deposit / Term Deposits (including callable deposits) All colours are as per Capita Asset Services matrix	Yellow Purple	£30m individual / £40m group	5 years 2 years
Property Funds Unit Trust	Considered on an individual basis	£30m	-
Sovereign Issues	AAA or UK	£30m	5 years
Corporate Bond Funds	Considered on an individual basis	£30m	-
UK Bonds	AAA / Government Backed	£30m	5 years
Bonds (multilateral)	AAA / Government Backed	£30m	5 years
Loan Capital or Third Party Loans	Subject to financial and legal due diligence	£10m	5 years or considered on individual basis
Enhanced Money Market Funds	AAA variable net asset value	£30m	-
Collateralised LA Deposit	AAA / Government Backed	£30m	5 years
Share Capital	Considered on an individual basis	£30m	-

8.4 The Council will consult its treasury advisor when considering Non Specified investments.

8.5 Enhanced Money Market Funds have been included above. This type of investment vehicle has a variable net asset value, and as such the capital value can rise or fall.

- 8.6 The Council may enter into forward agreements up to 3 months in advance of the investment commencing. If forward deposits are to be made, the forward period plus the deal period should not exceed the limits above.

## **9 Investments Defined as Capital Expenditure**

- 9.1 The acquisition of share capital or loan capital in any corporate body is defined as capital expenditure under Regulation 25(1)(d) of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003. Such investments will have to be funded from capital or revenue resources and will be classified as 'non-specified investments'.
- 9.2 Investments in "money market funds" which are collective investment schemes and bonds issued by "multilateral development banks" – both defined in SI 2004 No 534 – will not be treated as capital expenditure.
- 9.3 A loan or grant or financial assistance by this Council to another body for capital expenditure by that body will be treated as capital expenditure.

## **10 Provisions for Credit Related Losses**

- 10.1 If any of the Council's investments appear at risk of loss due to default (i.e. this is a credit-related loss and not one resulting from a fall in price due to movements in interest rates) the Council will make revenue provision of an appropriate amount.

## **11 End of Year Investment Report**

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

## **12 Pension Fund Cash**

- 12.1 The Council will comply with the requirements of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009, which were implemented on 1st January 2010. The Council will not pool pension fund cash with its own cash balances for investment purposes. Any investments made by the pension fund directly with this local authority will comply with the requirements of SI 2009 No 393.



