Appendix 1

BUCKINGHAMSHIRE COUNTY COUNCIL

TREASURY MANAGEMENT POLICY STATEMENT, TREASURY MANAGEMENT STRATEGY STATEMENT, ANNUAL INVESTMENT STRATEGY AND MINIMUM REVENUE PROVISION POLICY STATEMENT FOR 2016/17

Treasury Management Policy Statement

1 Buckinghamshire County Council defines it 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.

- The County 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. 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 Council 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.

- The investment policy objective for this Council is the prudent investment of its treasury balances. The Council's investment priorities are the security of capital and liquidity of its investments so that funds are available for expenditure when needed. Both the CIPFA Code and Department for Communities and Local Government (DCLG) guidance require the Council 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 generation of investment income to support the provision of local authority services is an important, but secondary, objective.

- The Council's borrowing objectives are to minimise the revenue costs of debt whilst maintaining a balanced loan portfolio. The Council will set an affordable borrowing limit each year in compliance with the Local Government Act 2003, and will have regard to the CIPFA Prudential Code for Capital Finance in Local Authorities when setting that limit.

Treasury Management Strategy Statement

Introduction

2 The Treasury Management Strategy details the expected activities of the treasury function in the forthcoming year 2016/17. The publication of the strategy is a statutory requirement.

3 The Treasury Management Strategy Statement and Annual Investment Strategy are underpinned by the CIPFA Code of Practice and Treasury Management Practices (TMPs) which provide prescriptive information as to how the treasury management function should be carried out.

Current Portfolio Position

4 The Council's treasury portfolio position as at 31 December 2015 comprised:

Borrowing			
Fixed Rate Funding	**£172.5m**	**Average Rate:**	**5.8%**
Investing			
In House Investments:			
Call accounts	**£20.0m**	**Average Rate:**	**0.8%**
Money market funds	**£59.3m**	**Average Rate:**	**0.7%**
Term deposits<1 year	**£99.5m**	**Average Rate:**	**0.6%**
Certificates of deposit<1 year	**£15.0m**	**Average Rate:**	**0.7%**
Term deposits>1 year	**£20.0m**	**Average Rate:**	**1.3%**
Property fund	**£5.0m**	**Average Rate:**	**4.7%**
Gross Investments	**£218.8m**	**Average Rate:**	**0.8%**
Net Investments	**£46.3m**		

5 The Council is intending to finance much of the Energy from Waste plant through a combination of earmarked reserves and current cash investments. Therefore, during the forthcoming 12 months, the Council's average investment balance is anticipated to reduce from £200m to approximately £30m. Following payment for the Energy for Waste plant, the Council plans to maintain minimum cash levels for operational purposes. Consequently, the Council's Annual Investment Strategy will change during 2016/17 following payment for the Energy for Waste plant. In order to maintain a diversified portfolio sovereign limits and counterparty limits will be reduced compared to current limits. A different strategy will operate once the cash balances reduce following the EfW plant payment. The limits prior to the EfW plant payment are the same as the 2015/16 strategy, apart from the Money Market Funds limit which has been temporarily increased from £150m to £200m in anticipation of requiring an increased access to short term cash prior to making the EfW plant payment. The table overleaf summarises the main changes:

	Cash limit prior to EfW plant payment	**Cash limit following EfW plant payment**
Any single organisation, except the UK Central Government	£25m each	**£10m each**
UK Central Government	unlimited	**unlimited**
Any group of pooled funds under the same management	£50m per manager ~~(£25m in 2015/16)~~	**£25m per manager**
AAA sovereign rated foreign countries	£30m per country	**£20m per country**
AA+ sovereign rated foreign countries	£15m per country	**£10m per country**
Money Market Funds	£200m in total ~~(£150m in 2015/16)~~	**£50m in total**

Prospects for Interest Rates

6 The Council has appointed Arlingclose as a treasury adviser to the Council. Part of Arlingclose's service is to assist the Council to formulate a view on interest rates. The Bank of England Base Rate, the official base rate paid on commercial bank reserves, has been 0.5% since March 2009. Arlingclose projects the first 0.25% increase in UK Bank Rate in the third quarter of 2016, rising by 0.5% a year thereafter, finally settling between 2% and 3% in several years' time. Persistently low inflation, subdued global growth and potential concerns over the UK's position in Europe mean that the risks to this forecast are weighted towards the downside. On 19 January 2016, the Governor of the Bank of England, Mark Carney, ruled out an immediate rise in interest rates because of the weakening outlook for the economy.

Borrowing Strategy

7 The Council's borrowing objectives are:

- To minimise the revenue costs of debt whilst maintaining a balanced loan portfolio.
- 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 borrow accordingly.
- To monitor and review the balance between fixed and variable rate loans against the background of interest rate levels and the Prudential Indicators.

8 The Council may borrow in advance of spending need, where this is expected to provide the best long term value for money. Where gross

debt is greater than the capital financing requirement the reasons for this should be clearly stated in the annual treasury management strategy. The Council is committed to building an Energy from Waste plant. This will require additional borrowing during 2016/17, although in practice much of this will be financed through a combination of earmarked reserves (approximately £50m) and current cash investments (internal borrowing) (approximately £90m to £100m). The Council is planning to borrow £30m to £40m in 2016/17, possibly from another local authority rather than the PWLB. ~~The Council may borrow £15m in advance of need during 2015/16 and a further £15m in 2016/17.~~ The Council will be repaying £10m of PWLB borrowing on 14 February 2016, a further £11.732m PWLB borrowing will be repaid during 2016/17.

~~9 The Council will be borrowing £36m on behalf of the Thames Valley Local Enterprise Partnership (LEP) for Aylesbury Eastern Link Road. HM Treasury has agreed that the LEP can access the PWLB Project Rate at a discount of 40 basis points below the standard PWLB rate, the County Council will arrange the loan and pay the interest to the PWLB on behalf of the LEP, the LEP will reimburse the costs incurred to the County Council so that the loan is cost neutral to the County Council.~~

~~10 HM Treasury have confirmed that they are taking the necessary legislative steps to abolish the PWLB in the coming months. This development is purely being taken to address the governance of the PWLB. The CLG have stated that it will have no impact on existing loans held by local authorities or the government's policy on local authority borrowing. HMT has confirmed that the PWLB's lending functions will continue unaffected albeit under a different body so that local authorities will continue to access borrowing at rates which offer good value for money.~~

11 The Council may borrow short term loans, normally for up to one month, to cover unexpected cash flow shortages.

12 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. This Council has not committed resources to investing in the company, which offers potential borrowing alternative for the Council.~~ Any decision to borrow from the Agency will be the subject of a separate report to the Council.

Investment Strategy

13 This Council maintains investments that are placed with reference to cash flow requirements. Investment of the Council's funds is in accordance with the Annual Investment Strategy.

Debt Rescheduling

14 The potential for debt rescheduling is monitored in light of interest rate movements. Any rescheduling will be in accordance with the borrowing strategy. The reasons for rescheduling include:

- The generation of cash savings at minimum risk.
- Fulfilment of the borrowing strategy.
- Enhancement of the maturity profile of the borrowing portfolio.

15 All rescheduling will be reported retrospectively as part of the Treasury Management Update Reports to the Regulatory and Audit Committee and County Council.

CIPFA Treasury Management Code of Practice

16 CIPFA recommends that all public service organisations adopt the following four clauses.

17 This Council will create and maintain, as the cornerstones for effective treasury management:

- A treasury management policy statement, stating the policies, objectives, approach to risk management of its treasury management activities, borrowing policies and investment policies.
- Suitable Treasury Management Practices (TMPs), setting out the manner in which the organisation will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.

18 This Council will receive reports on its treasury management policies and activities, including an annual strategy and plan in advance of the year, a mid year review and an annual report after its close, in the form prescribed in its TMPs.

19 This Council delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices to the Regulatory and Audit Committee, and for the execution and administration of treasury management decisions to the Director of Assurance, who will act in accordance with the Council's policy statement and TMPs and CIPFA's Standard of Professional Practice on Treasury Management.

20 This Council nominates the Regulatory and Audit Committee to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.

Annual Investment Strategy

Introduction

21 This Council has regard to the DCLG's revised Guidance on Local Government Investments and CIPFA's Treasury Management in Public Services: Code of Practice and Cross Sectoral Guidance Notes.

22 The Annual Investment Strategy states which investments, specified and non-specified, the Council may use for the prudent management of its treasury balances during the financial year.

23 This strategy sets out this Council's policies for managing its investments and for giving priority to the security of capital and liquidity of those investments.

Investment Objectives

24 The general policy objective for this Council is the prudent investment of its treasury balances. The Council's investment priorities are the **security** of capital and **liquidity** of its investments so that funds are available for expenditure when needed. Both the CIPFA Code and DCLG guidance require the Council 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 generation of investment income to support the provision of local authority services is an important, but secondary, objective. The effective management and control of risk are prime objectives of the Council's treasury management activities. Investment of the Council's funds will be in accordance with the Treasury Management Strategy and Policy. All investments will be in sterling to mitigate the impact of currency risk.

25 The Council's investments, agreed lending list and strategy are reviewed on a monthly basis by the Treasury Management Group.

26 The Council's treasury management ensures it has sufficient cash to meet its needs, balancing achieving value for money with the security of its investments (achieving a balance between security, liquidity and yield). Performance is monitored against its treasury management strategy and outcomes matched against benchmarks. The Council meets any tax and prompt payment legislation (Late Payment of Commercial Debts (Interest) Act 1998).

27 The DCLG maintains that the borrowing of monies purely to invest or lend on and make a return is unlawful and this Council will not engage in such activity.

28 Through various mechanisms identified in this strategy, the Council ensures that investment risks are effectively mitigated. The Council will ensure that an appropriate balance is found between maximising

investment income to the Council within a prudent, transparent and logical investment strategy. The security of the principal sum shall be the Council's prime risk factor.

Approved Counterparties

29 A country is assigned a sovereign rating which signifies a country's ability to provide a secure investment environment which reflects factors such as economic status, political stability and foreign currency reserves. The strongest sovereign rating that can be achieved is "AAA", "AA+" is the next strongest. The Council invests in the UK or specified AAA and AA+ sovereign rated countries, the total maximum that can be invested in an individual AAA sovereign rated country is £30m **(£20m following payment for the Energy for Waste plant)** and the total maximum that can be invested in an individual AA+ sovereign rated country is £15m **(£10m following payment for the Energy for Waste plant)**. Countries that are currently AAA sovereign rated are Australia, Canada, Denmark, Germany, Luxembourg, Netherlands, Norway, Singapore, Sweden and Switzerland. Austria, Finland, ~~Netherlands,~~ United Kingdom and the USA are currently AA+ sovereign rated. Santander UK plc ~~and Clydesdale Bank plc~~ is deemed to be a UK institution, although their parent bank is based in Spain ~~and Australia respectively~~, it has extensive UK operations. Sovereign credit rating criteria and foreign country limits will not apply to investments in multilateral development banks (e.g. the European Investment Bank and the World Bank) or other supranational organisations (e.g. the European Union).

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

Cash limits (per counterparty) prior to payment for the Energy for Waste Plant					
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 5 years	£25m 20 years	£25m 50 years	~~£15m 20 years~~	~~£5m 5 years~~
AA+	£15m 5 years	£25m 10 years	£25m 25 years	~~£15m 10 years~~	~~£5m 5 years~~
AA	£15m 4 years	£25m 5 years	£25m 15 years	~~£15m 5 years~~	~~£5m 5 years~~
AA-	£15m 3 years	£25m 4 years	£25m 10 years	~~£15m 4 years~~	~~£5m 5 years~~
A+	£15m 2 years	£25m 3 years	£15m 5 years	~~£15m 3 years~~	~~£5m 5 years~~
A	£10m 13 months	£25m 2 years	£15m 5 years	~~£10m 2 years~~	~~£5m 5 years~~
A-	£10m 6 months	£25m 13 months	£15m 5 years	~~£10m 13 months~~	~~£5m 5 years~~
BBB+	£3m 100 days	£3m 6 months	£3m 2 years	~~£3m 6 months~~	~~£5m 2 years~~
BBB ~~or BBB-~~	£3m next day only	£3m 100 days	n/a	~~n/a~~	~~n/a~~
None	£3m 6 months	n/a	£25m 25 years		~~£5m 5 years~~
Pooled funds	~~£25m~~ £40m per fund				

Cash limits (per counterparty) following payment for the Energy for Waste Plant			
Credit Rating	**Banks Unsecured**	**Banks Secured**	**Government**
UK Govt	n/a	n/a	£ Unlimited 50 years
AAA	£5m 5 years	£10m 20 years	£10m 50 years
AA+	£5m 5 years	£10m 10 years	£10m 25 years
AA	£5m 4 years	£10m 5 years	£10m 15 years
AA-	£5m 3 years	£10m 4 years	£10m 10 years
A+	£5m 2 years	£10m 3 years	£5m 5 years
A	£5m 13 months	£10m 2 years	£5m 5 years
A-	£5m 6 months	£10m 13 months	£5m 5 years
BBB+	£3m 100 days	£3m 6 months	£3m 2 years
BBB	£3m next day only	£3m 100 days	n/a
None	£3m 6 months	n/a	£10m 25 years
Pooled funds	£25m per fund		

These tables must be read in conjunction with the following notes:

31 **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.

32 **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. Unsecured investment with banks rated BBB are restricted to overnight deposits at the Authority's current account bank Lloyds plc.

33 **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.

34 **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.

~~35 **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.~~

~~36 **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.~~

37 **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. Short term Money Market Funds that offer same-day liquidity and very low or no volatility 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.

38 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.

~~Group Limits~~

~~39 The maximum amount invested with a connected group of counterparties is £20m (although the maximum investment with a single counterparty within any group is dependent on the bank's credit rating). Investments in part nationalised and nationalised banks are not subject to a government group limit.~~

Credit Watch / Outlook

40 From time to time an institution will be placed on negative watch or negative outlook, indicating that a downgrade is either likely or possible in the future. Watches are considered short term actions, whereas

outlooks are considered over a longer time horizon. If an institution is on negative watch so that it is likely to fall below the above 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.

Credit Default Swaps (CDS)

41 Credit rating agencies lag market events and therefore do not provide investors with an up to date picture of the credit quality of a particular institution. A CDS is a financial instrument which insures against the risk of a counterparty defaulting on its credit. When the cost of this insurance is highest, then it is more likely that the market considers a credit event will occur. Each month Arlingclose provides CDS spreads information enabling the Treasury Team to monitor short, medium and long term trends of CDS spreads. If there is a spike in the values of CDS's due to adverse market conditions, then Arlingclose alert the Treasury Team immediately.

Specified Investments

~~42~~ Specified investments offer relatively high security and high liquidity. These investments can be used with minimal procedural formalities. The DCLG Guidance defines specified investments as those denominated in sterling, with a maturity of no more than a year and invested with one of the UK Government, a UK local authority, parish council or community council or a body or investment scheme of "high credit quality". ~~with a long term rating of A- or above.~~

43 The Council 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 long term credit rating of A- or higher.

Non-Specified Investments

44 Any investment not meeting the definition of a specified investment is classed as non-specified. The Council does not intend to make any investments denominated in foreign currencies, nor with any low credit quality bodies.

~~45~~ 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, unrated funds and unrated organisations. ~~EU proposals are being introduced to remove the credit rating AAA wrapping that money market funds are currently assigned, some of the Council's liquidity funds could be unrated. For non-specified investments proper procedures must be in place for undertaking risk assessments prior to investments being placed.~~

~~46~~ The majority of the Council's investments will be made for relatively short periods and in highly credit rated investments, giving priority to security and liquidity ahead of yield. ~~However, where the Council has a core cash balance that is not required for any current or planned cash outflow, these funds will be considered suitable for a wider range of investments, with a more moderate focus on security and liquidity and a greater focus on achieving a level of investment income that can support Council services. These may include long-term investments with registered providers of social housing or corporate bond funds where an enhanced return is paid to cover the additional risks presented, only a small proportion of cash would be invested at any one time in these investments. Standard risk mitigation techniques, such as wide diversification and external credit assessments, will be employed, and no such investment will be made without a specific recommendation from the Council's treasury management adviser in consultation with the Cabinet Member for Finance and Resources, the Deputy Cabinet Member for Finance and Resources and the internal Treasury Management Group.~~

47 Limits on non-specified investments are shown in the table below.

	Cash limit prior to EfW plant payment	**Cash limit following EfW plant payment**
Total long-term investments	~~£75m~~ £25m	£25m
Total investments without credit ratings or rated below A- (includes other local authorities)	£100m	**£50m**
Total non-specified investments	~~£150m~~ £125m	**£75m**

48 The table below sets out investment limits

	Cash limit prior to EfW plant payment	**Cash limit following EfW plant payment**
Any single organisation, except the UK Central Government	£25m each	**£10m each**
UK Central Government	unlimited	**unlimited**
Any group of organisations under the same ownership	£20m per group	**£10m per group**
Any group of pooled funds under the same management	£50m per manager	**£25m per manager**
Negotiable instruments held in a broker's nominee account	£100m per broker	**£30m per broker**

AAA sovereign rated foreign countries	£30m per country	**£20m per country**
AA+ sovereign rated foreign countries	£15m per country	**£10m per country**
Unsecured investments with Building Societies	£25m in total	**£10m in total**
~~Registered Providers~~	~~£25m in total~~	
Money Market Funds	£200m in total	**£50m in total**

Security of Capital: The use of Credit Ratings

49 This Council relies on credit ratings published by the ratings agencies Fitch, Moodys and Standard and Poors to establish the credit quality of counterparties and investment schemes. The lowest available credit rating will be used to determine credit quality. Credit rated institutions are selected using criteria based on the country, also known as sovereign rating if the institution is not UK.

Monitoring of credit ratings:

- The Council has access to Fitch, Moodys and Standard & Poors credit ratings and is alerted to changes through e-mail updates.
- The Council invests in UK or specified AAA / AA+ sovereign rated countries, to improve the potential for diversification and also to optimise access to investments in the world's highest rated institutions the total maximum that can be invested in a AAA sovereign rated individual country is £30m **(£20m following payment for the Energy for Waste plant)** and £15m **(£10m following payment for the Energy for Waste plant)** individual country maximum for AA+ sovereign rated.
- If a counterparty or investment scheme's rating is downgraded with the result that it no longer meets the Council's minimum criteria, the further use of that counterparty/investment scheme as a new investment will be withdrawn immediately.
- If a counterparty is upgraded so that it fulfils the Council's criteria, its inclusion on the lending list will be considered and put to the Director of Assurance for approval.
- From time to time an institution will be placed on negative watch or negative outlook, indicating that a downgrade is either likely or possible in the future. Watches are considered short term actions, whereas outlooks are considered over a longer time horizon. If an institution is on negative watch so that it is likely to fall below the above 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.

Use of Specified and Non-Specified Investments

50 The use of specified and non-specified investments is limited to those set out above. The Director of Assurance will keep the use of such

investments under continuous review in the light of risk, liquidity and return. No additions will be made without the approval of the Council, following appropriate consultation.

Investment balances / Liquidity of investments

51 Based on its cash flow forecasts, the Council anticipates its fund balances in 2016/17 to range between £30m ~~(£200m)~~ and £220m ~~(£250m).~~ The balance will be highest at the beginning of the financial year, reducing to minimum cash levels for operational purposes following the EfW plant payment. A prime consideration in the investment of fund balances is liquidity and the Council's forecast cash flow. Investments are made in accordance with this Annual Investment Strategy and the investment strategies approved by the Director of Assurance during the year.

Policy on Use of Financial Derivatives

52 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).

53 The general power of competence in section 1 of the Localism Bill 2011 removes much of the uncertain legal position over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment). The CIPFA Code requires authorities to clearly detail their policy on the use of derivatives in the annual strategy.

54 The Council 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 Council 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 represent will be managed in line with the overall treasury risk management strategy. This Council used swaps to hedge against currency and interest rates fluctuations for the Energy for Waste project.

Provisions for Credit-related losses

55 If any of the Council's investments appear at risk of loss due to default the Council will make revenue provision of an appropriate amount; although, the Council will make all reasonable attempts to secure any potential defaults prior to such an occurrence.

Reporting & Governance Arrangements

~~56~~ The treasury strategy, six monthly review and annual activity reports are presented to the Regulatory and Audit Committee. The Council's investments, agreed lending list and strategy are reviewed on a monthly basis by the Treasury Management Group which includes the Cabinet Member for Resources, the Deputy Cabinet Member for Resources, the Director of Assurance and other key officers; the Prudential Indicators are reviewed quarterly at this meeting. ~~Following a recent review the internal audit team's overall conclusion on the system of internal control being maintained is "substantial". A substantial audit opinion is the best grading that internal audit can award. It means that "there is a strong system of internal control in place and risks are being effectively managed. Some minor action may be required to improve controls".~~

Training

57 Member and officer training is essential in terms of understanding roles and keeping up to date with changes. It is an essential component of the CIPFA Treasury Management Code of Practice; to address this training need, training will be provided to all members of the Regulatory & Audit Committee and key officers attend relevant courses / seminars on treasury management.

Treasury Management Advisers

58 The Council has appointed Arlingclose as treasury management advisers and receives specific advice on investment, debt and capital finance issues. However, responsibility for final decision making remains with the Council and its officers. The services received include advice and guidance on relevant policies, strategies and reports, advice on investment decisions, notification of credit ratings and changes, other information on credit quality, advice on debt management decisions, accounting advice, reports on treasury performance, forecasts of interest rates and training courses for officers and members.

59 The quality of this service is reviewed by participating in CIPFA's treasury management benchmarking and monitoring investment performance against a weighted average LIBID.

Investment of Money Borrowed in Advance of Need

60 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.

61 The total amount borrowed will not exceed the authorised borrowing limit. The maximum period between borrowing and expenditure is expected to be two years, although the Council is not required to link particular loans with particular items of expenditure.

Minimum Revenue Provision Policy Statement

62 Prior to 2008/09, the Council in accordance with legislation made a contribution from revenue to cover 4% of the unfinanced borrowing that has been undertaken to support the capital programme. This contribution is called the Minimum Revenue Provision (MRP).

63 The Secretary of State under section 21(1A) of the Local Government Act 2003 issued guidance on the calculation of MRP in February 2008, 2008/09 was the first year of operation.

64 Where capital expenditure was incurred before 1 April 2008 MRP will continue to be charged at the rate of 4% of the outstanding Capital Financing Requirement, in accordance with the guidance. For capital expenditure incurred on or after 1 April 2008 and funded through borrowing, the Council will calculate MRP using a more complex calculation called the asset life annuity method. Using this method MRP is calculated in a similar way as calculating the capital repayment element of a fixed rate repayment mortgage.

65 In accordance with provisions in the guidance, MRP will be first charged in the year following the date that an asset becomes operational.

66 Certain expenditure reflected within the debt liability at 31st March 2008 will under delegated powers be subject to MRP using the asset life annuity method, which will be charged over a period which is reasonably commensurate with the estimated useful life applicable to the nature of expenditure.

67 The asset life annuity method calculation requires estimated useful lives of assets to be input in to the calculations. These life periods will be determined under delegated powers to the Director of Assurance, with regard to the statutory guidance.

68 However, the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the asset life annuity method would not be appropriate.

69 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 and will only be

divided up in cases where there are two or more major components with substantially different useful economic lives.

Background Papers

CIPFA Code of Practice on Treasury Management in the Public Service revised 2011
DCLG Guidance on Local Government Investments revised in 2010
Communities and Local Government Guidance on Minimum Revenue Provision issued February 2008.

Director of Assurance
3 February 2016