

BUCKINGHAMSHIRE COUNTY COUNCIL

**TREASURY MANAGEMENT POLICY STATEMENT, TREASURY
MANAGEMENT STRATEGY STATEMENT, MINIMUM REVENUE
PROVISION POLICY STATEMENT AND ANNUAL INVESTMENT
STRATEGY FOR 2014/15**

Treasury Management Policy Statement

- 1 Buckinghamshire County Council 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.
 - 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 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 2014/15. 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 2013 comprised:

Borrowing

Fixed Rate Funding	£185.9m	Average Rate:	6.1%
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Investing

In House Investments:

Call accounts	£35.0m	Average Rate:	0.7%
Money market funds	£43.4m	Average Rate:	0.5%
Term deposits < 1 year	£128.0m	Average Rate:	0.6%
Term deposits > 1 year	£10.0m	Average Rate:	1.3%

External Investments	£5.0m
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Net Investments	£35.5m
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Prospects for Interest Rates

- 5 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. Arlingclose's projected path for short term interest rates remains flat until late 2016. The risk to the upside (i.e. rates being higher) are weighted more heavily towards the end of the forecast horizon. The Bank of England Base Rate, the official base rate paid on commercial bank reserves, has been 0.5% since March 2009.
- 6 The Bank of England's Monetary Policy Committee (MPC) through its recent forward guidance is committed to keeping policy rates low for an extended period using the Labour Force Survey unemployment rate of 7% as a threshold for when it would consider whether or not to raise interest rates, provided this does not propose risks to inflation or financial stability.

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.

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 may require additional borrowing during 2016/17, although in practice much of this may be financed through a combination of earmarked reserves and current cash investments. The Council may borrow £10m per annum in advance of need during 2014/15 and 2015/16 and a further £10m in 2016/17.

8 During 2014/15 the Council will be borrowing £16m on behalf of the South East Local Enterprise Partnership (LEP) Buckinghamshire for Aylesbury Eastern Link Road and High Wycombe Town Centre Transport Projects. 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.

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

Investments Strategy

10 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

11 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.

12 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

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

14 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.

- 15 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.
- 16 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 Service Director (Finance and Commercial Services), who will act in accordance with the Council's policy statement and TMPs and CIPFA's Standard of Professional Practice on Treasury Management.
- 17 This Council nominates the Regulatory and Audit Committee to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.

Minimum Revenue Provision Policy Statement

- 18 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).
- 19 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.
- 20 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.
- 21 In accordance with provisions in the guidance, MRP will be first charged in the year following the date that an asset becomes operational.
- 22 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.
- 23 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 Service Director (Finance and Commercial Services), with regard to the statutory guidance.
- 24 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.

- 25 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.

Annual Investment Strategy

Introduction

- 26 This Council has regard to the DCLG's revised Guidance on Local Government Investments issued in 2010 and the 2011 revised CIPFA's Treasury Management in Public Services: Code of Practice and Cross Sectoral Guidance Notes.
- 27 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. These are listed in Schedule A.
- 28 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

- 29 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.
- 30 The Council's investments, agreed lending list and strategy are reviewed on a monthly basis by the Treasury Management Group.
- 31 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).
- 32 The Department for Communities and Local Government (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.

- 33 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.

Specified Investments

- 34 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.

Non-Specified Investments

- 35 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, ~~nor any that are defined as capital expenditure by legislation (such as company shares.)~~ The overall limit that can be invested in non-specified investments is £150m.
- 36 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. Investment instruments identified for use in the financial year are listed in Schedule A under the specified and non-specified investments categories.
- 37 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.

Security of Capital: The use of Credit Ratings

- 38 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. The criteria used to select the credit rated banks and building societies is set out at Schedule B.

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 and £15m 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 Service Director (Finance and Commercial Services) 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 ~~no further~~ 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

- 39 The use of specified and non-specified investments is limited to those set out in Schedule A. The Service Director (Finance and Commercial Services) 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

- 40 Based on its cash flow forecasts, the Council anticipates its fund balances in 2014/15 to range between £200m and £250m. 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 Service Director (Finance and Commercial Services) during the year.

Policy on Use of Financial Derivatives

- 41 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).
- 42 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.
- 43 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

- 44 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. The Icelandic Supreme Court found in favour of UK local authorities and other UK wholesale depositors, this means that UK local authorities' claims have been recognised as deposits with priority status over other creditors' claims. We are being paid first when it comes to getting our money back; to date we have received £2.7m and will recover most of the £5 million we had on deposit with Landsbanki.

Reporting & Governance Arrangements

- 45 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 Finance & Resources, the Deputy Cabinet Member for Finance & Resources, the Service Director (Finance and Commercial Services) and other key officers; the Prudential Indicators are reviewed quarterly at this meeting.

Training

- 46 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

- 47 The Council contracts with Arlingclose to provide advice and information relating to its investments and borrowing activities. 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.
- 48 The quality of this service is reviewed by participating in CIPFA's treasury management benchmarking and monitoring investment performance against a weighted average LIBID.

Prudential Indicators

- 49 In accordance with the Local Government Act 2003 the Council is required to agree a range of indicators to demonstrate that its investment plans are affordable, prudent and sustainable. The indicators, based on 2014/15 to 2017/18 capital programme form part of this strategy, are attached as Schedule C. The Prudential Indicators are monitored on a quarterly basis at the Treasury Management Group meetings and progress against the Indicators is reported to the Regulatory & Audit Committee in the mid year and annual activity report.

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.

Service Director (Finance & Commercial Services)
20 January 2014