



# Report to Audit and Governance Committee

**Date:** 27<sup>th</sup> January 2021

**Reference number:** for cabinet member decisions only

**Title:** Treasury Management Strategy 2021/22

**Relevant councillor(s):** Katrina Wood, Deputy Leader and Cabinet Member for Resources

**Author and/or contact officer:** Julie Edwards

**Recommendations:** The Audit and Governance Committee are asked to recommend the Council's Treasury Management Strategy for 2021/22 to Council to agree at its meeting on 24<sup>th</sup> February 2021.

## Executive summary

1.1 The Council is required to approve a treasury management strategy before the start of each financial year. The table below is a summary of the Council's treasury position on 30 November 2020.

	1 Apr 2020 £m	30 Sep 2020 £m	30 Nov 2020 £m
<b>Borrowing:</b>			
PWLB <sup>1</sup>	-335.5	-330.0	-327.3
LOBO <sup>2</sup>	-30.0	-30.0	-30.0
Accrued Interest	-2.5	-2.5	-2.5
<b>Gross Borrowing</b>	<b>-368.0</b>	<b>-362.5</b>	<b>-359.8</b>
<b>Treasury Cash:</b>			
Banks	42.2	9.0	4.0
Local Authorities (invested less than 364 days)	35.5	10.5	10.5
Money Market Funds (MMFs)	37.6	137.1	127.4
UK Government	0.0	10.0	55.8
Property Fund	20.0	20.0	20.0
<b>Gross Treasury Investments</b>	<b>135.3</b>	<b>186.6</b>	<b>217.7</b>
<b>Net Cash/(Borrowing)</b>	<b>-232.7</b>	<b>-175.9</b>	<b>-142.1</b>

<sup>1</sup> PWLB Public Works Loans Board. The PWLB is a statutory body, part of HM Treasury; its purpose is to lend money to local authorities. The Council's main objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required.

<sup>2</sup> LOBOs Lender Option Borrower Option. LOBOs are long term borrowing instruments which include an option for the lender to periodically revise the interest rate. If the lender decides to revise the interest rate, the borrower then has the option to pay the revised interest rate or repay the loan.

- 1.2 The Council pursues a strategy of keeping borrowing and investments below their underlying levels, sometimes known as internal borrowing, in order to reduce risk and keep external financing costs low. Treasury cash balances have been higher than anticipated due to the Council receiving Covid-19 grants in advance of incurring the expenditure and slippage in the Capital Programme due to Covid-19. Liquid cash is diversified over several counterparties and Money Market Funds to manage both credit and liquidity risks. As a consequence of holding high cash balances at certain times of the year, the Council has placed more cash with the UK Government to avoid breaching the treasury policy, these investments are low risk with low interest.
- 1.3 The Council's main objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The Council is actively reviewing opportunities for borrowing at low rates if borrowing is required to finance items within the capital programme. A reduction of 1% in PWLB loans took effect on 26th November 2020 which presents the Council with the opportunity for borrowing for regeneration schemes at low cost. As a condition of accessing the PWLB, the Council will be asked to confirm there is no intention to buy commercial properties in the current or next two financial years.
- 1.4 Given the increasing risk and very low returns from short-term unsecured bank investments, the Council aims to diversify into more secure and/or higher yielding asset classes during 2021/22. This diversification represents a change in strategy over the coming year. The majority of the Council's surplus cash is currently invested in money market funds. Following advice from the Council's treasury advisers Arllingclose the upper limit on all Money Market Fund (MMF) investments has been removed and the individual limit on a MMF has been increased from £25m to £30m. However, MMFs are a key tool to manage credit and liquidity risks and diversification across counterparties.

## Content of report

- 1.5 In line with the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice for Treasury Management and the Council's Financial Regulations, this Council is required to submit a treasury management strategy for the following financial year to the Audit and Governance Committee to consider on 27<sup>th</sup> January 2021, prior to the Council agreeing the strategy at its meeting on 24<sup>th</sup> February 2021.

The Code of Practice defines 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.

Treasury management is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2017 Edition (the CIPFA Code).

- 1.6 The Council's investment strategy sets out the approach for choosing investment counterparties. They are based on a system of credit ratings provided by the three main credit rating agencies and supplemented by additional market data (such as rating outlooks, credit default swaps and bank share prices) provided by our treasury advisors.
- 1.7 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.
- 1.8 **Strategy:** The Council's Treasury Management Strategy for 2021/22, Borrowing Indicators and Treasury Indicators for security, liquidity and maturity structure of borrowing are attached as Appendix 1. These are continually monitored to ensure that we don't breach. Given the increasing risk and very low returns from short-term unsecured bank investments, the Council aims to diversify into more secure and/or higher yielding asset classes during 2021/22. The majority of the Council's surplus cash is currently invested in money market funds. This diversification represents a change in strategy over the coming year.
- 1.9 **Approved counterparties:** The Council 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.

## Approved treasury investment counterparties and limits

Sector	Time limit	Counterparty limit	Sector Limit
The UK Government	50 years	Unlimited	n/a
Local authorities and other government entities	25 years	£10m	Unlimited
Secured investments <sup>3</sup>	25 years	£10m	Unlimited
Banks (unsecured) <sup>3</sup>	13 months	£5m	Unlimited
Building societies (unsecured) <sup>3</sup>	13 months	£5m	£10m
Registered providers (unsecured) <sup>3</sup>	5 years	£5m	£25m
Money market funds	n/a	£30m	Unlimited
Strategic pooled funds	n/a	£30m	£60m
Other investments <sup>3</sup>	5 years	£5m	£10m

This table must be read in conjunction with the notes below.

<sup>3</sup> **Minimum Credit rating:** Treasury investments in the sectors marked with a “<sup>3</sup>” will only be made with entities whose lowest published long-term credit rating is no lower than A-. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account. For entities without published credit ratings, investments may be made where external advice indicates the entity to be of similar credit quality.

1.10 Building societies (unsecured) and registered providers (unsecured) have been added to the list of approved counterparties. Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government support if needed.

1.11 The upper limit on all Money Market Fund (MMF) investments has been removed. This is following advice from the Council’s treasury advisers Arlingclose who introduced a sector limit on MMFs recognising that they all make similar underlying investments and therefore moving from 50% to 100% in MMFs may not increase underlying diversification. However, MMFs are a key tool to manage credit and liquidity risks and in the current economic climate diversification into other sectors may increase risk, Arlingclose therefore no longer advise a 50% limit. Although no

sector limit applies to money market funds, the Council will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times.

- 1.12 The strategy continues to enable the Council to invest unlimited amounts with the UK Government. On 25th September 2020 the overnight, 1- and 2-week deposit rates on Debt Management Account Deposit Facility (DMADF) deposits dropped below zero percent to -0.03%, the rate was 0% for 3-week deposits and 0.01% for longer maturities. In recent months the Council has been placing cash with the DMADF for longer maturities to avoid negative interest rates.
- 1.13 **Negative interest rates:** The Covid-19 pandemic has increased the risk that the Bank of England could set its Bank Base Rate at or below zero, which is likely to feed through to negative interest rates on all low risk, short-term investment options. Since investments cannot pay negative income, negative rates will be applied by reducing the value of investments. In this event, security will be measured as receiving the contractually agreed amount at maturity, even though this may be less than the amount originally invested.
- 1.14 The principal sums invested for periods longer than a year has been increased from £25m to £50m in 2021/22 to enable the Council to increase interest income by locking out term deposits for longer maturities.

#### Legal and financial implications

- 1.15 The publication of an annual strategy, a mid-year treasury report and an annual treasury management report conforms to best practice as required by the Code of Practice CIPFA Treasury Management in the Public Services.

#### Corporate implications

- 1.16 There are none.



## Treasury Management Strategy 2021/22

### Background

The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Treasury Management is the management of the Council's cash flows, borrowing, investments and their associated risks, to ensure this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.

The second main function of the Treasury Management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans, or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.

Treasury risk management at the Council is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2017 Edition* (the CIPFA Code) which requires the Council to approve a treasury management strategy before the start of each financial year. This report fulfils the Council's legal obligation under the *Local Government Act 2003* to have regard to the CIPFA Code.

Investments held for service purposes or for commercial profit are considered in the Capital and Investment Strategy rather than the Treasury Management Strategy document. This will cover in detail the capital plans for the Council (including the capital related prudential indicators), the minimum revenue provision (MRP) policy and non-financial investments (such as Property).

### CIPFA Treasury Management Code of Practice

CIPFA recommends that all public service organisations adopt, as part of their standing orders, financial regulations, or other formal policy documents appropriate to their circumstances, the following four clauses:

- (i) This Council will create and maintain, as the cornerstones for effective treasury management:
  - a treasury management policy statement, stating the policies, objectives and approach to risk management of its treasury management activities.
  - suitable treasury management practices (TMPs), setting out the manner in which the Council will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.

The content of the policy statement and TMPs will follow the recommendations contained in the CIPFA Code, subject only to amendment where necessary to reflect the particular

circumstances of this Council. Such amendments will not result in the organisation materially deviating from the Code's key principles.

- (ii) This Council will receive reports on its treasury management policies, practices and activities, including, as a minimum, 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.
- (iii) This Council delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices to the Resources Cabinet Member, and for the implementation and administration of treasury management policy and decisions to the Service Director – Corporate Finance and Section 151 Officer, who will act in accordance with the organisation's policy statement and TMPs and, as a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management.
- (iv) This organisation nominates the Audit and Governance Committee to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.

### **Treasury Management Reporting Arrangements**

The Council is required to receive and approve, as a minimum 3 main treasury reports each year, after appropriate scrutiny from the Audit and Governance Committee:

- (i) The Treasury Management Strategy – Forward looking detailing the Council's approach to cash investment and borrowing, including the treasury indicators.
- (ii) A mid-year treasury management report – This is delegated to the Audit and Governance Committee and is primarily a progress report for members, reporting of any policy revisions if required.
- (iii) An annual treasury management report – This is delegated to the Audit and Governance Committee and is a backward looking review document providing details of prudential and treasury indicators and treasury performance.

### **External Context**

**Economic background:** The impact on the UK from coronavirus, lockdown measures, the rollout of vaccines, as well as the new trading arrangements with the European Union (EU), will remain a major influence on the Council's treasury management strategy for 2021/22. The Bank of England (BoE) maintained Bank Rate at 0.10% in December and the Quantitative Easing programme at £895 billion having extended it by £150 billion in the previous month. The Monetary Policy Committee voted unanimously for both, but no mention was made of the potential future use of negative interest rates. The BoE also forecasts the economy will now take until Q1 2022 to reach its pre-pandemic level rather than the end of 2021 as previously forecast. By the time of the December MPC announcement, a COVID-19 vaccine was approved for use, which the Bank noted would reduce some of the downside risks to the economic outlook outlined in the November Monetary Policy Report.

**Credit outlook:** After spiking in late March as coronavirus became a global pandemic, credit default swap (CDS) prices for the larger UK banks have steadily fallen back to almost pre-pandemic levels.

Although uncertainty around COVID-19 related loan defaults lead to banks provisioning billions for potential losses in the first half of 2020, drastically reducing profits, reported impairments for Q3 were much reduced in some institutions. However, general bank profitability in 2020 is likely to be significantly lower than in previous years.

The credit ratings for many UK institutions were downgraded on the back of downgrades to the sovereign rating. Credit conditions more generally though in banks and building societies have tended to be relatively benign, despite the impact of the pandemic.

Looking forward, the potential for bank losses to be greater than expected when government and central bank support starts to be removed remains a risk, suggesting a cautious approach to bank deposits in 2021/22 remains advisable.

**Interest rate forecast:** The Council's treasury management adviser Arlingclose is forecasting that Bank Rate will remain at 0.10% until at least the first quarter of 2024. The risks to this forecast are judged to be to the downside as the BoE and UK government continue to react to the coronavirus pandemic and the new EU trading arrangements. The BoE extended its asset purchase programme to £895 billion in November while keeping Bank Rate on hold and maintained this position in December. However, further interest rate cuts to zero, or possibly negative, cannot yet be ruled out but this is not part of the Arlingclose central forecast. Gilt yields are expected to remain very low in the medium-term while short-term yields are likely remain below or at zero until such time as the BoE expressly rules out the chance of negative interest rates or growth/inflation prospects improve. The central case is for 10-year and 20-year to rise to around 0.60% and 0.90% respectively over the time horizon. The risks around the gilt yield forecasts are judged to be broadly balanced between upside and downside risks, but there will almost certainly be short-term volatility due to economic and political uncertainty and events.

### Current Portfolio Position

Buckinghamshire Council's treasury position as at 30 November 2020 is summarised below:

	1 Apr 2020 £m	30 Sep 2020 £m	30 Nov 2020 £m
<b>Borrowing:</b>			
PWLB <sup>1</sup>	-335.5	-330.0	-327.3
LOBO <sup>2</sup>	-30.0	-30.0	-30.0
Accrued Interest	-2.5	-2.5	-2.5
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<sup>1</sup> PWLB (Public Works Loan Board) – The PWLB is a statutory body, part of the Treasury. Its purpose is to lend money to local authorities. The Council's main objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which those funds are required.

<sup>2</sup> LOBO (Lender Option Borrower Option) – LOBOs are long term borrowing instruments which include an option for the lender to periodically revise the interest rate. If the lender decides to revise the interest rate, the borrower then has the option to pay the revised rate or repay the loan.

The Council's current strategy is to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing.

### **Borrowing Strategy**

The Council currently holds £357.4 million of loans as part of its strategy for funding previous years' capital programmes, £58.0 million will be repaid to the PWLB by the end of 2021/2022. The Council may borrow additional sums to pre-fund future years' requirements, providing this does not exceed the authorised limit for borrowing of £495 million.

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

**Strategy:** The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. With short-term interest rates currently much lower than long-term rates, it is likely to be more cost effective in the short-term to either use internal resources, or to borrow short-term loans instead.

By doing so, the Council is able to reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk. The benefits of internal and short-term borrowing will be monitored regularly against the potential for incurring additional costs by deferring borrowing into future years when long-term borrowing rates are forecast to rise modestly. The Council's treasury management advisers will assist the Council with this 'cost of carry' and breakeven analysis. Its output may determine whether the Council borrows additional sums at long term fixed rates in 2021/22 with a view to keeping future interest costs low, even if this causes additional cost in the short-term.

The Council has previously raised the majority of its long-term borrowing from the PWLB but will consider long-term loans from other sources including banks, pensions and local authorities, and may investigate the possibility of issuing bonds and similar instruments, in order to lower interest costs and reduce over-reliance on one source of funding in line with the CIPFA Code. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the Council intends to avoid this activity in order to retain its access to PWLB loans.

Alternatively, the Council may arrange forward starting loans, where the interest rate is fixed in advance, but the cash is received in later years. This would enable certainty of cost to be achieved without suffering a cost of carry in the intervening period.

In addition, the Council may borrow short-term loans to cover unplanned cash flow shortages.

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

- HM Treasury's PWLB lending facility (formerly the Public Works Loan Board)
- any institution approved for investments (see below)
- any other bank or building society authorised to operate in the UK
- any other UK public sector body
- UK public and private sector pension funds (except the Buckinghamshire Pension Fund)
- capital market bond investors
- UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues

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

- leasing
- hire purchase
- sale and leaseback

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

**Municipal Bonds Agency:** UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It issues bonds on the capital markets and lends the proceeds to local authorities. This is a more complicated source of finance than the PWLB for two reasons: borrowing authorities are required to provide bond investors with a guarantee to refund their investment in the event that the agency is unable to for any reason; and there will be a lead time of several months between committing to borrow and knowing the interest rate payable. Any decision to borrow from the Agency will be the subject of a separate report to Cabinet for approval before pursuing this option.

**LOBOs:** The Council holds £30m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Council has the option to either accept the new rate or to repay the loan at no additional cost. None of these LOBOs have options during 2021/22.

**Short-term and variable rate loans:** These loans leave the Council exposed to the risk of short-term interest rate rises and are therefore subject to the interest rate exposure limits in the treasury management indicators below. Financial derivatives may be used to manage this interest rate risk (see section below).

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

### **Borrowing in Advance of Need**

The Council has the power to borrow in advance of need in line with its future borrowing requirements under the Local Authorities (Capital Finance and Accounting)(England) Regulations 2003, as amended.

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 and not in relation to any commercial property investment. Any decision to borrow in advance will be within the 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.

Risks associated with any borrowing in advance of activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

### **Treasury Investment Strategy**

The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. In recent months, the Council's treasury investment balance has ranged between £185m and £295m (including the CCLA property investment), slightly lower levels are expected to be maintained in the forthcoming year.

**Objectives:** The CIPFA Code requires the Council to invest its treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the Council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested.

**Negative interest rates:** The Covid-19 pandemic has increased the risk that the Bank of England could set its Bank Base Rate at or below zero, which is likely to feed through to negative interest rates on all low risk, short-term investment options. Since investments cannot pay negative income, negative rates will be applied by reducing the value of investments. In this event, security will be measured as receiving the contractually agreed amount at maturity, even though this may be less than the amount originally invested.

**Strategy:** Given the increasing risk and very low returns from short-term unsecured bank investments, the Council aims to diversify into more secure and/or higher yielding asset classes during 2021/22. The majority of the Council's surplus cash is currently invested in money market funds. This diversification represents a change in strategy over the coming year.

**Approved counterparties:** The Council 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.

Approved treasury investment counterparties and limits

Sector	Time limit	Counterparty limit	Sector Limit
The UK Government	50 years	Unlimited	n/a
Local authorities and other government entities	25 years	£10m	Unlimited
Secured investments <sup>3</sup>	25 years	£10m	Unlimited
Banks (unsecured) <sup>3</sup>	13 months	£5m	Unlimited
Building societies (unsecured) <sup>3</sup>	13 months	£5m	£10m
Registered providers (unsecured) <sup>3</sup>	5 years	£5m	£25m
Money market funds	n/a	£30m	Unlimited
Strategic pooled funds	n/a	£30m	£60m
Other investments <sup>3</sup>	5 years	£5m	£10m

This table must be read in conjunction with the notes below.

<sup>3</sup> **Minimum Credit rating:** Treasury investments in the sectors marked with a “<sup>3</sup>” will only be made with entities whose lowest published long-term credit rating is no lower than A-. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account.

For entities without published credit ratings, investments may be made where external advice indicates the entity to be of similar credit quality.

**Government:** Loans to, and 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 generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.

**Secured investments:** Investments secured on the borrower’s assets, which limits the potential losses in the event of insolvency. The amount and quality of the security will be a key factor in the investment decision. Covered bonds and reverse repurchase agreements with banks and building societies 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 higher 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.

**Banks and building societies (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. See below for arrangements relating to operational bank accounts.

**Registered providers (unsecured):** Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government support if needed.

**Money market funds:** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. They have the advantage over bank accounts of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a small fee. Although no sector limit applies to money market funds, the Council will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times.

**Strategic pooled funds:** Bond, equity and property funds that offer enhanced returns over the longer term, but are more volatile in the short term. These allow the Council 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 Council's investment objectives will be monitored regularly.

**Other investments:** This category covers treasury investments not listed above, for example unsecured corporate bonds and company loans. Non-bank companies cannot be bailed-in but can become insolvent placing the Council's investment at risk.

**Operational bank accounts:** The Council may incur operational exposures, for example through current accounts, collection accounts and merchant acquiring services, to any UK bank with credit ratings no lower than BBB- and with assets greater than £25 billion. These are not classed as investments, but are still subject to the risk of a bank bail-in. The Bank of England has stated that in the event of failure, banks with assets greater than £25 billion are more likely to be bailed-in than made insolvent, increasing the chance of the Council maintaining operational continuity.

**Risk assessment and credit ratings:** Credit ratings are obtained and monitored by the Council's treasury advisers, who will notify changes in ratings as they occur. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:

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

**Other information on the security of investments:** The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential government support, reports in the quality financial press and analysis and advice from the Council's treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.

When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2020, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Council's cash balances, then the surplus will be deposited with the UK Government, or with other local authorities. This will cause a investment returns to fall but will protect the principal sum invested.

**Investment limits:** The Council's revenue reserves available to cover investment losses are forecast to be approximately £260 million on 31st March 2021. In order that no more than 10% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £10 million. A group of entities under the same ownership will be treated as a single organisation for limit purposes. Limits will also be placed on fund managers, foreign countries and industry sectors as below. Investments in pooled funds and multilateral development banks do not count against the limit for any single foreign country, since the risk is diversified over many countries.

#### Additional Investment Limits

	<b>Cash Limit</b>
Any single organisation, except the UK Government	£10m each
UK Central Government	Unlimited
Any group or organisations under the same ownership <sup>4</sup>	£10m per group
Any group of pooled funds under the same management	£30m per manager
AAA sovereign rated foreign countries	£20m per country
AA+ sovereign rated foreign countries	£10m per country

<sup>4</sup>£10m per organisation limit does not apply to pooled funds

**Liquidity management:** The Council uses purpose-built cash flow forecasting software to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Council's medium-term financial plan and cash flow forecast.

The Council will spread its liquid cash over at least three providers (e.g. bank accounts and money market funds) to ensure that access to cash is maintained in the event of operational difficulties at any one provider.

#### **Borrowing Prudential Indicators**

Indicator			Unit	2020/21	2021/22	2022/23
Gross Debt	Estimate	Years 1, 2 and 3	£m	323.96	394.56	439.86
Capital Financing Requirement			£m	467.53	483.58	482.54

Indicator			Unit	2020/21	2021/22	2022/23
Authorised limit (for borrowing) *	Estimate	Years 1, 2 and 3	£m	425.00	495.00	540.00
Authorised limit (for other long term liabilities) *	Estimate	Years 1, 2 and 3	£m	10.00	10.00	10.00
<b>Authorised Limit (for total external debt) *</b>			<b>£m</b>	<b>435.00</b>	<b>505.00</b>	<b>550.00</b>

\* These limits can only be breached with the approval of the full Council to raise them

Indicator			Unit	2020/21	2021/22	2022/23
Operational boundary (for borrowing)	Estimate	Years 1, 2 and 3	£m	325.00	395.00	440.00
Operational boundary (for other long term liabilities)	Estimate	Years 1, 2 and 3	£m	7.50	7.50	7.50
<b>Operational Boundary</b>			<b>£m</b>	<b>332.50</b>	<b>402.50</b>	<b>447.50</b>

The operational boundary is the expected borrowing position of the Council during the year. Periods where the actual position is either below or over the boundary is acceptable subject to the authorised limit not being breached.

### Treasury Management Indicators

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

**Security:** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Credit Risk Indicator	Target
Portfolio average credit rating	A

**Liquidity:** The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling one month period, without additional borrowing.

Liquidity Risk Indicator	Target
Total cash available within one month	£10m

The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at current rates.

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

Refinancing rate risk indicator	Upper Limit	Lower Limit
Under 12 months	30%	0%

12 months and within 24 months	25%	0%
24 months and within 5 years	30%	0%
5 years and within 10 years	40%	0%
10 years and above	80%	20%

Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

**Principal sums invested for periods longer than a year:** The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

Price risk indicator	2021/22	2022/23	2023/24
Limit on principal invested beyond year end	£50m	£25m	£25m

### Related Matters

The CIPFA Code requires the Council to include the following in its treasury management strategy.

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

The 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, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria, assessed using the appropriate credit rating for derivative exposures. An allowance for credit risk will count against the counterparty credit limit and the relevant foreign country limit.

In line with the CIPFA Code, the Council will seek external advice and will consider that advice before entering into financial derivatives to ensure it fully understands the implications.

**Markets in Financial Instruments Directive:** The Council has opted up to professional client status with its providers of financial services, allowing it access to a greater range of services but without the greater regulatory protections afforded to individuals and small companies. Given the size and range of the Council's treasury management activities, the Service Director – Corporate Finance & Section 151 Officer believes this to be the most appropriate status.



## Other Options Considered

The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Service Director - Corporate Finance and S151 Officer, having consulted the Cabinet Member for Resources, believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

Alternative	Impact on Income and Expenditure	Impact on Risk Management
Invest in a narrower range of counterparties and/or for shorter periods.	Interest income will be lower.	Lower chance of losses from credit related defaults, but any such losses may be greater.
Invest in a wider range of counterparties and/or for longer periods.	Interest income will be higher.	Increased risk of losses from credit related defaults, but any such losses may be smaller.
Borrow additional sums at long-term fixed interest rates.	Debt interest costs will rise; this is unlikely to be offset by higher investment income.	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain.
Borrow short-term or variable loans instead of long-term fixed rates.	Debt interest costs will initially be lower.	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long term costs may be less certain.
Reduce level of borrowing.	Saving on debt interest is likely to exceed lost investment income.	Reduced investment balance leading to a lower impact in the event of a default; however long term interest costs may be less certain.