TREASURY MANAGEMENT STRATEGY AND PRUDENTIAL INDICATORS 2023-24

1.0 Introduction

- 1.1 The Local Government Act 2003 and supporting regulations require the Council to 'have regard to' the Prudential Code and to set Prudential Indicators for the next three years to ensure that the Council's capital investment plans are affordable, prudent and sustainable.
- 1.2 The Act requires the Council to set out its treasury strategy for borrowing and to prepare an Annual Investment Strategy (as required by Investment Guidance issued subsequent to the Act) (included as section 12); this sets out the Council's policies for managing its investments and for giving priority to the security and liquidity of those investments.
- 1.3 Revised reporting was required from 2019/20 onwards due to revisions of the MHCLG Investment Guidance, the MHCLG Minimum Revenue Provision (MRP) Guidance, the CIPFA Prudential Code and the CIPFA Treasury Management Code. The primary reporting changes include the introduction of a capital strategy, to provide a longer-term focus to the capital plans, and greater reporting requirements surrounding any commercial activity undertaken under the Localism Act 2011.
- 1.4 CIPFA published the revised Treasury Management and Prudential Codes on 20th December 2021 and has stated that revisions need to be included in the reporting framework from the 2023/24 financial year. This Authority, therefore, has to have regard to these Codes of Practice when it prepares the strategies detailed below, and also related reports during the financial year, which are presented to members for approval.

2.0 Treasury Management Strategy 2023/24

- 2.1 The suggested strategy for 2023/24 in respect of the following aspects of the treasury management function is based upon the Treasury officers' views on interest rates, supplemented with leading market forecasts provided by the Council's treasury advisor. The strategy covers:
 - treasury limits in force which will limit the treasury risk and activities of the Council;
 - Prudential Indicators;
 - the current treasury position;
 - the borrowing requirement;
 - prospects for interest rates;
 - the borrowing strategy;
 - policy on borrowing in advance of need;
 - borrowing rescheduling;
 - the investment strategy;
 - creditworthiness policy;
 - policy on use of external service providers;
 - the MRP strategy; and
 - Council loans to Group Companies
 - Liability benchmark
 - Reporting to members (now quarterly)
 - Environmental, social and governance (ESG)
- 2.2 It is a statutory requirement under Section 33 of the Local Government Finance Act 1992, for the Council to produce a balanced budget. In particular, Section 32 requires a local authority

to calculate its budget requirement for each financial year to include the revenue costs that flow from capital financing decisions.

- 2.3 This, therefore, means that increases in capital expenditure must be limited to a level whereby increases in charges to revenue from:
 - increases in interest charges caused by increased borrowing to finance additional capital expenditure, and
 - any increases in running costs from new capital projects

are limited to a level which is affordable within the projected income of the Council for the foreseeable future.

2.4 The Council's reserves are set aside for specific purposes; in order to progress long term capital investment initiatives considered to be in the interests of residents where there are not sufficient reserves of capital or revenue, the Council needs to borrow. There is no absolute limit on what the Council can borrow; it can borrow what it considers it can afford to repay from its income sources such as council tax and service charges including rental income. Nevertheless the risks associated with service and commercial investments should be proportionate to their financial capacity. The new Treasury management and Prudential codes, which come into effect from 2023/24, emphasise this principal of proportionality.

3.0 Treasury Limits for 2023/24 to 2026/27

- 3.1 It is a statutory duty under Section 3 of the Local Government Act 2003 and supporting regulations, for the Council to determine and keep under review how much it can afford to borrow. In England and Wales the Authorised Limit represents the legislative limit specified in section 3 of the Local Government Act 2003.
- 3.2 The revenue consequences of capital expenditure and financing decisions have been included in the General Fund and HRA reports (elsewhere on this agenda) and the assessment of the affordability of the Council's Investment Programme is made in the context of those reports. The Investment Programme is the subject of a separate report elsewhere on this agenda. The prudential limits contained in this report are therefore informed by the proposals in those reports.
- 3.3 The Authorised Limit for external borrowing is to be set, on a rolling basis, for the forthcoming financial year and three successive financial years.
- 3.4 The Treasury limits include an allowance above the planned long term borrowing requirement for the year. This enables short term cashflow requirements to be covered and provides some flexibility to facilitate borrowing in advance for known future requirements at advantageous interest rates. The allowance is particularly important considering the potential cashflow implications of the current economic climate.

4.0 Prudential Indicators for 2022/23 to 2026/27

4.1 The prudential indicators in table 1 below are relevant for the purposes of setting an integrated treasury management strategy. Non-treasury management prudential indicators are set out in Appendix 3 to the General Fund Service Plans, Budgets and Prudential Indicators report elsewhere on this agenda.

| PRUDENTIAL INDICATOR | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2025/26 |
|---|------------|------------|------------|------------|------------|
| TABLE 1 - TREASURY MANAGEMENT PRUDENTIAL INDICATORS | £'000 | £'000 | £'000 | £'000 | £'000 |
| | Estimate | Estimate | Estimate | Estimate | Estimate |
| Authorised limit for external borrowing - | | | | | |
| Non - HRA | | | | | |
| Borrowing | £2,024,910 | £2,131,592 | £2,230,426 | £2,282,244 | £2,282,972 |
| Other long term liabilities | £22,242 | £20,989 | £19,660 | £18,168 | £16,676 |
| Total Non - HRA | £2,047,152 | £2,152,581 | £2,250,086 | £2,300,412 | £2,299,648 |
| HRA | | | | | |
| Borrowing | £156,186 | £156,686 | £157,186 | £157,686 | £158,186 |
| Other long term liabilities | £0 | £0 | £0 | £0 | £0 |
| Total HRA | £156,186 | £156,686 | £157,186 | £157,686 | £158,186 |
| . 5.5. | 2.00,.00 | 2.00,000 | 2.0.,.00 | 2.0.,000 | 2.00,.00 |
| Total authorised limit for external borrowing | £2,203,338 | £2,309,267 | £2,407,272 | £2,458,098 | £2,457,834 |
| Operational boundary for external borrowing - Non - HRA | | | | | |
| Borrowing | £2,014,910 | £2,121,592 | £2,220,426 | £2,272,244 | £2,272,972 |
| other long term liabilities | £22,242 | £20,989 | £19,660 | £18,168 | £16,676 |
| TOTAL Non - HRA | £2,037,152 | £2,142,581 | £2,240,086 | £2,290,412 | £2,289,648 |
| HRA | | | | | |
| Borrowing | £156,186 | £156,686 | £157,186 | £157,686 | £158,186 |
| other long term liabilities | £0 | £0 | £0 | £0 | £0 |
| Total HRA | £156,186 | £156,686 | £157,186 | £157,686 | £158,186 |
| | 2.00,.00 | 2.00,000 | 2.0.,.00 | 2.0.,000 | 2.00,.00 |
| Total operational boundary for external borrowing | £2,193,338 | £2,299,267 | £2,397,272 | £2,448,098 | £2,447,834 |
| Housing Revenue Account Limit on Indebtedness * | n/a | n/a | n/a | n/a | n/a |
| Upper limit for fixed interest rate exposure | 100% | 100% | 100% | 100% | 100% |
| Upper limit for variable rate exposure | 70% | 70% | 70% | 70% | 70% |
| Upper limit for total principal sums invested for over 365 days (per maturity date) | £3,000 | £3,000 | £3,000 | £3,000 | £3,000 |

^{*} The Housing Revenue Account Limit on Indebtedness (the 'Debt Cap') was scrapped by the Chancellor in the 2018 Autumn Budget.

| Maturity structure of new fixed rate borrowing during 2023/24 | upper limit | lower limit |
|---|-------------|-------------|
| under 12 months | 100% | 0% |
| 12 months and within 24 months | 100% | 0% |
| 24 months and within 5 years | 100% | 0% |
| 5 years and within 10 years | 100% | 0% |
| 10 years and above | 100% | 0% |

| PRUDENTIAL INDICATOR | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 |
|---|------------|------------|------------|------------|------------|
| | £'000 | £'000 | £'000 | £'000 | £'000 |
| | Estimate | Estimate | Estimate | Estimate | Estimate |
| Gross Borrowing : Capital Financing Requirement | | | | | |
| External Borrowing Borrowing at 1st April | 04 070 047 | 00 405 070 | 00 044 050 | 00 000 500 | 00 404 040 |
| . | £1,876,347 | £2,105,076 | £2,211,258 | £2,308,592 | £2,404,910 |
| Expected change in borrowing | £207,740 | £86,446 | £79,003 | £79,642 | -£7,956 |
| Other long term liabilities | £22,242 | £20,989 | £19,660 | £18,168 | £16,676 |
| Expected change in other long term | , | , | , | , | • |
| liabilities | -£1,253 | -£1,253 | -£1,329 | -£1,492 | -£1,492 |
| Gross Borrowing at 31st March | £2,105,076 | £2,211,258 | £2,308,592 | £2,404,910 | £2,412,138 |
| Capital Financing Requirement at 31st March * | £2,105,076 | £2,211,258 | £2,308,592 | £2,404,910 | £2,412,138 |
| Under/(over) borrowing | £0 | £0 | £0 | £0 | £0 |

^{*} The Capital Financing Requirement includes borrowing undertaken for group company activities.

- 4.2 Changes to the CIPFA Treasury Management Code now advise that prudential indicators should be reported quarterly. Officers will look into the most appropriate method of reporting this through 2023/24. This could be through inclusion in the new quarterly Performance and Monitoring developed for 2023/24.
- 4.3 The updated Codes also require the introduction of a new liability benchmark treasury indicator. The Medium Term Financial Strategy (MTFS) paper being presented to the March Executive and Council will incorporate this indicator together with updated positions on MRP, Thameswey Business Plans, and the Sheerwater Regeneration where available.

5.0 Current Treasury Position

5.1 The Council's position at 31st December 2022 is set out below.

| | | Prin | Principal | | |
|---|--------|---------|-----------|--------|--|
| Borrowing | | £m | £m | % | |
| Long term borrowing: | | | | | |
| Fixed rate funding | PWLB | 1,795.9 | | 2.65 | |
| | Market | 30.0 | | 4.48 | |
| | | | 1,825.9 | 2.68 | |
| Variable rate funding | PWLB | 0.0 | | - | |
| | Market | 0.0 | _ | - | |
| | | | 0.0 | | |
| Other long term liabilities (PFI) | | | 23.5 | 3.73 | |
| Total long term borrowing | | | 1,849.4 | 2.69 | |
| Short term borrowing | | | 120.0 | 3.39 | |
| Total Borrowing | | | 1,969.4 | 2.74 | |
| Investments External Cash deposits - Long term on advice of TUK | | 0.0 | | _ | |
| - Short term on advice of TUK | | 0.0 | | | |
| | | | 0.0 | | |
| - Short term WBC Treasury | | | 25.6 | 0.02 | |
| Long term investments in Group/External Companies | | | 1,263.8 | 3.12 | |
| Total Investments | | | 1,289.4 | _ 3.06 | |
| | | | | | |

6.0 Borrowing Requirement

| | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 |
|---------------------------|----------|----------|----------|----------|----------|
| | £'000 | £'000 | £'000 | £'000 | £'000 |
| | Estimate | Estimate | Estimate | Estimate | Estimate |
| New borrowing – Non – HRA | 292,307 | 172,215 | 163,936 | 172,297 | 6,728 |
| New borrowing – HRA | 1,067 | 500 | 500 | 500 | 500 |
| TOTAL | 293,374 | 172,715 | 164,436 | 172,797 | 7,228 |
| | | | | | |

- 6.1 The borrowing requirement includes borrowing for the Investment Programme and advances to group companies and joint ventures, including the Victoria Square Development.
- 6.2 The replacement borrowing indicates the years in which the Council's loans mature and may need replacing. Replacement borrowing may also be required when LOBOs (Lender Option Borrower Option) reach a step up date, if circumstances dictate and the Council chooses to repay the LOBO.

7.0 Prospects for interest rates

- 7.1 The Council has appointed Link Asset Services as treasury adviser to the Council and part of their service is to assist the Council to inform our view on interest rates. Appendix B draws together a number of current City forecasts for short term (Bank Rate) and longer fixed interest rates.
- 7.2 Link Asset Services current Bank Rate forecast for financial year ends (March) is: -
 - 2022/23 4.25%
 - 2023/24 4.00%
 - 2024/25 2.75%
 - 2025/26 2.50%

8.0 Borrowing Strategy

8.1 The Link Asset Services forecast for the PWLB new borrowing rates for maturity loans is shown in the table below. These rates take into account the certainty rate discount of 0.20% but still include the premium of 0.80% over the actual cost of borrowing.

| | Mar-23 | Jun-23 | Sep-23 | Dec-23 | Mar-24 | Mar-25 | Mar-26 |
|-----------------|--------|--------|--------|--------|--------|--------|--------|
| Bank rate | 4.25% | 4.50% | 4.50% | 4.25% | 4.00% | 2.75% | 2.50% |
| 5 yr PWLB rate | 4.00% | 4.00% | 3.90% | 3.80% | 3.70% | 3.30% | 3.10% |
| 10 yr PWLB rate | 4.20% | 4.20% | 4.10% | 4.00% | 3.90% | 3.50% | 3.20% |
| 25 yr PWLB rate | 4.60% | 4.60% | 4.40% | 4.30% | 4.20% | 3.70% | 3.40% |
| 50 yr PWLB rate | 4.30% | 4.30% | 4.20% | 4.10% | 3.90% | 3.40% | 3.10% |

8.2 The timing of new long term borrowing will depend on the borrowing requirements (including the term of the projects being undertaken and resulting asset lives), the cost of carrying long term funding compared to short term borrowing; and the projections on interest rates. The Link forecasts above are a suitable trigger point for considering fixed rate long term borrowing during 2023/24.

- 8.3 Generally the Council looks to take long term borrowing (usually over 50 years) to match the economic lives of the underlying assets created by the projects the borrowing is used to finance. However, as reported in the 2022/23 Treasury Management Mid-Year review, the Council's treasury management advisors (Link Group) have advised that long-term borrowing should be deferred where possible as their expectation is for long-term rates to fall (as indicated in the forecast rates above). The Council is therefore currently taking short-term loans with a view to converting these to long-term when PWLB rates fall in future years. The treasury estimates assume that this will continue in 2023/24 and the Council has budgeted to achieve a 4% average borrowing rate in 2023/24 through taking short-term borrowing.
- 8.4 Variable rate borrowing is expected to be cheaper than long term borrowing but due to the volatility in interest rates and the term of the borrowing, fixed rate borrowing is the Council's preferred option. In making a decision on the borrowing term and type of loan, consideration will be given to the purpose for which the borrowing is being taken and the market conditions at that time. Where a scheme being funded is relatively short term or tied to a specific funding decision, the borrowing will normally reflect this.
- 8.5 When undertaking new maturity borrowing, the Council looks to spread its loan maturity profile and this strategy will continue during the year ahead. Borrowing is likely to continue to be annuity loans for significant projects which ensure a consistent payment profile over the life of the loan. The current maturity profile is shown in Appendix I.
- 8.6 Consideration is usually given to borrowing fixed rate market loans at 25 50 basis points below PWLB target rate. However, as discussed above, long-term borrowing is unlikely to be taken at the current forecast rates.
- 8.7 It is possible that the Municipal Bond Agency will offer loans to local authorities in the future. The Council will review the options available through the Municipal Bond Agency for possible borrowing in the future if and when information is available.

PWLB Borrowing

- 8.8 On 25 November 2020, the Chancellor announced the conclusion to the review of PWLB borrowing terms. The margins over gilt yields for PWLB rates; the standard and certainty margins were reduced by 1% but a prohibition was introduced to deny access to borrowing from the PWLB for any local authority which had purchase of assets for yield in its three-year capital programme. The new margins over gilt yields are as follows: -.
 - PWLB Standard Rate is gilt plus 100 basis points (G+100bps)
 - PWLB Certainty Rate is gilt plus 80 basis points (G+80bps)
 - PWLB HRA Standard Rate is gilt plus 100 basis points (G+100bps)
 - PWLB HRA Certainty Rate is gilt plus 80bps (G+80bps)
 - Local Infrastructure Rate is gilt plus 60bps (G+60bps)
- 8.9 Officers will continue to review whether to bid for the local infrastructure rate through the Infrastructure bank. The rate available is only 20 bps less than the certainty rate (which the Council already has access to) and the cash has to be taken in one drawn down after a long application period. Therefore the 20 bps benefit could be offset by increases in interest rates and the cost of holding the funds before being spent.

Asset Lives

8.10 The length of borrowing taken will be linked to the asset lives of the underlying Council Investment Programme. Treasury management decisions, and individual loans, are not directly associated with individual assets. However, if there are significant long or short term

- assets being acquired or loans advanced in any year, consideration will be given to matching these asset lives/terms in the underlying borrowing secured.
- 8.11 In recent years, and in 2023/24, the majority of borrowing is applied to very long term assets and projects with a 50 year business case. It is likely that the majority of borrowing taken in 2023/24 will be short-term with a view to converting to 50 year annuity (matching the modelling of these projects) when rates fall.

Sensitivity of the forecast

- 8.12 In normal circumstances the main sensitivities of the forecast are likely to be the two scenarios below. The Council Treasury Officers, in conjunction with the treasury advisers, will continually monitor both the prevailing interest rates and the market forecasts, adopting the following approaches to changing circumstances:
 - if it was felt that there was a significant risk of a sharp fall in long and short term rates, then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.
 - If it was felt that there was a significant risk of a much sharper rise in long and short term rates than currently forecast, then the portfolio position will be re-appraised with the likely action that fixed rate funding will be drawn whilst interest rates are still relatively cheap, whilst taking into account the cost of carry of the borrowing until it is required.

9.0 External Borrowing v Investments

| Comparison of gross and net borrowing | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 |
|---------------------------------------|----------|----------|----------|----------|----------|
| positions at year end | £m | £m | £m | £m | £m |
| External Borrowing - Non HRA | 1,948.89 | 2,054.57 | 2,151.41 | 2,247.22 | 2,253.95 |
| External Borrowing - HRA | 156.19 | 156.69 | 157.19 | 157.69 | 158.19 |
| Total | 2,105.08 | 2,211.26 | 2,308.59 | 2,404.91 | 2,412.14 |
| Cash Balances - | 2.00 - | 2.00 - | 2.00 - | 2.00 | - 2.00 |
| Net Borrowing | 2,103.08 | 2,209.26 | 2,306.59 | 2,402.91 | 2,410.14 |

- 9.1 The table above shows the Council's projected net external borrowing position (calculated as gross borrowing less cash balances including short term investments). As at 31 December 2022, cash balances totalled £25.6m giving a net external borrowing of £1,942.6m.
- 9.2 Treasury officers will monitor the interest rate market and report any decisions in the Monthly Performance and Monitoring Information ('Green Book').

10.0 Policy on borrowing in advance of need

- 10.1 The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance for known requirements will be considered carefully to ensure value for money can be demonstrated and that the Council can ensure the security of funds.
- 10.2 In determining whether borrowing will be undertaken in advance of need the Council will;
 - ensure that there is a clear link between the investment programme and maturity profile
 of the existing portfolio which supports the need to take funding in advance of need;

- ensure the on going revenue liabilities created, and the implications for future plans and budgets have been considered, including the cost of carry of the borrowing until it is needed;
- evaluate the economic and market factors that might influence the manner and timing of any decision to borrow;
- consider the merits and demerits of alternative forms of funding; and
- consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use.

11.0 Borrowing Rescheduling

- 11.1 The introduction by the PWLB in 2007 of a spread between the rates applied to new borrowing and repayment of borrowing means that PWLB to PWLB restructuring is currently much less attractive. This was compounded in October 2010 by a considerable further widening of the difference between new borrowing and repayment rates as part of the Comprehensive Spending Review, through the addition of a premium on the cost of borrowing. In particular, consideration would have to be given to the costs which would be incurred by prematurely repaying existing PWLB loans and it is very unlikely that these could be justified on value for money grounds if using replacement PWLB refinancing. This still remains the case despite the recent changes to the margins discussed above. However, some interest savings may still be achievable by using LOBO (Lenders Option Borrowers Option) loans and other market loans in rescheduling exercises rather than using PWLB borrowing as the source of replacement financing.
- 11.2 The reasons for any rescheduling to take place will include:
 - The generation of cash savings and / or discounted cash flow savings;
 - Enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).
- 11.1 Should market conditions indicate there is an advantage to rescheduling borrowing, Officers will call a meeting of the Treasury Management Panel to consider the proposals. Any rescheduling will be reported to the Executive in the Monthly Performance and Monitoring Information ('Green Book').

12.0 Annual Investment Strategy

Investment Strategy

- 12.1 The Council's in house managed funds are mainly cash flow derived. Investments will accordingly be made with reference to cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Were there to be any core balance of funds up to £10 million available for investment over a 0-5 year period, these funds that would be managed on the advice of Tradition UK.
- 12.2 The Council currently holds no investments for which the remaining time to maturity is in excess of one year.
- 12.3 Developed economies have been open for some months now post-pandemic, but the degree to which inflation has taken root in those economies has demanded central banks tighten monetary policy dramatically compared to the ultra-low interest rates of the past decade. On the 2 February 2023 the Bank of England increased the bank rate to 4.00%. As shown in the

- forecast table above, the Bank Rate is expected to peak at 4.50% in mid 2023/24 and then gradually reducing to 2.50% at the end of the forecast period in 2026.
- 12.4 The increase in rates offers more increased returns on treasury investments. However, in the current economic climate, it is considered appropriate to maintain a degree of liquidity to cover cash flow needs and therefore deposits must be short-term.
- 12.5 For its cash flow generated balances, the Council will seek to utilise its Lloyds business reserve account, money market funds and short-dated deposits (overnight to three months) using secure counterparties in order to benefit from the compounding of interest.
- 12.6 The Council will receive monthly reports on its investment activity in the Green Book, an annual monitoring report to the Overview and Scrutiny Committee and at the end of the financial year as part of its Annual Treasury Report.

Investment Policy

- 12.7 The Council will have regard to the DLUHC's Guidance on Local Government Investments ("the Guidance"), CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 ("the Code"), and the CIPFA Treasury Management Guidance Notes 2018
- 12.8 The Council will also aim to achieve the optimum return on its investments commensurate with proper levels of security and liquidity. The risk appetite of this Council is low the Council's investment priorities will be security first, liquidity second and then return.
- 12.9 The borrowing of monies purely to invest or on-lend to external parties to make a return is unlawful and this Council will not engage in such activity. This excludes lending to group companies and other organisations which is carried out in order to achieve the Council's strategic objectives.
- 12.10 Part of the Council's investments may be managed on the advice of Tradition UK (TUK) and will reflect TUK's views of market and the future for interest rates. Subject to the availability of funds, TUK may be asked to manage up to £10m. TUK are the only external fund manager involved in the management of the Council's funds, although no funds are held with them at the present time.
- 12.11All investments of the Council's funds will comply with the Annual Investment Strategy. The arrangements between the Council and TUK additionally stipulate guidelines and duration and other limits in order to contain and control risk.
- 12.12Investment instruments identified for use in the financial year are listed in Appendix D under the 'Specified' and 'Non-Specified' Investments categories (determined by level of risk). Counterparty limits will be as set through the Council's Treasury Management Practices Schedules. The limits shown are maximum levels. The Chief Finance Officer in consultation with Treasury Officers has the scope to reduce these limits (below those shown) to minimise the level of cash at risk in the light of market conditions. As Money Market Funds (MMFs) are diversified by nature and AAA rated, the Chief Finance Officer, in consultation with Treasury Officers, will vary the limits of these funds in order to manage cash flows. These limits will be updated in the Treasury Management Practices.
- 12.13 When the Council has funds in excess of normal limits that it is not possible or economical to invest with a suitable counterparty, these will remain on deposit with Lloyds Bank, the Council's banker.

Credit Worthiness Policy

- 12.14 The Council uses Fitch ratings to derive its investment criteria (used in the table Appendix D). Where a counterparty does not have a Fitch rating, the equivalent Moody's rating will be used. The Council is alerted to all credit rating changes on a daily basis through its use of the Link Asset Services creditworthiness service. If a downgrade results in the counterparty/investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
- 12.15The Link Asset Services creditworthiness service uses a modelling approach with credit ratings from all three rating agencies Fitch, Moodys and Standard and Poors, forming the core element. However, it does not rely solely on the current credit ratings of counterparties but also uses credit watches, credit outlooks and other information in a weighted scoring system. The end product is a series of colour code bands which indicate the relative creditworthiness of counterparties and give a recommended duration for investments.
- 12.16 When placing investments Treasury Officers will take account of this information, although it is not followed entirely such as in the use of building societies.
- 12.17Treasury officers are of the view that credit rating agencies and Link Asset Services have underestimated the level of support within the building society sector. Consequently the Council will continue to use Building Societies based on asset value and market sentiment indicating that the risk is acceptable.
- 12.18 This Council will not use the approach suggested by CIPFA of using the lowest rating from all three rating agencies to determine creditworthy counterparties as this would leave the Council with few financial institutions on its approved lending list. The Link Asset Services creditworthiness service does use ratings from all three agencies, but by using a scoring system, does not give undue preponderance to just one agency's ratings.
- 12.19The Council's credit limits have historically been set at a sufficiently high level that none of the institutions that have not been able to meet their commitments in recent times, have been on the Council's lending list, or those that have got into difficulties have received government support. Similarly none of the building societies in which the Council has invested have failed to meet their commitments. On this basis the Council will continue to use Link Asset Services' creditworthiness service, credit ratings and asset value (for building societies) for determining eligibility for the lending list. As indicated in paragraph earlier in the report, the risk appetite of the Council is low, and the priority for investment is security, followed by liquidity, then return.

Country Limits

- 12.20 The Council will only use approved counterparties from the UK and countries with a minimum sovereign credit rating of AA+ from Fitch Ratings (or equivalent from other agencies if Fitch does not provide). The list of countries that qualify using this criteria are shown in Appendix E. This list will be added to or deducted from by officers should ratings change in accordance with this policy.
- 12.21 The Executive resolved in June 2016 that the UK be excluded from the sovereign rating criteria, as it is not felt that there is additional risk to undertaking investments in the UK.
- 12.22 Should the level of the Council's investments increase it will seek to avoid a concentration of investments in too few counterparties or countries (although a concentration in the UK is not considered to be undesirable).

13.0 Use of External Service Providers

13.1 As previously stated the Council uses Link Asset Services as its external treasury management advisors in order to acquire access to specialist skills and resources. The services provided include the following:-

- Provision of interest rate forecasts and advice on borrowing and investment strategies;
- Regular updates on economic and political changes;
- Forecasts of movements in Public Works Loan Board rates;
- Advice on debt rescheduling, funding policy, volatility and maturity profile analysis;
- Advice on investment counterparty creditworthiness;
- Provision of annual template documents and advice on the various Treasury Management reports; and
- Treasury Management training.
- 13.2 Although external treasury management advisors are used, responsibility for treasury management decisions remains with the Council at all times and undue reliance is not placed upon the external service provider.

14.0 MRP Policy

- 14.1 As required by MHCLG regulations, the Council has adopted a policy for setting aside funds for the repayment of borrowing through the Minimum Revenue Provision. Appendix A contains the policy statement.
- 14.2 As referred to in the overarching report the Department for Levelling Up, Housing and Communities (DLUHC) issued a consultation on MRP on 30th November 2021. Although the initial consultation has closed further revisions to the MRP guidance are expected. The MRP policy will be updated to incorporate any new requirements following the consultation.
- 14.3 The Council has commissioned an independent review of the MRP policy and application in its accounts. The results of this will be reported through the MTFS updates during 2023/24 and any change in policy as a result will be recommended for Council approval.

15.0 Council Loans to Group Companies

- 15.1 Council loans to Group Companies will continue to be structured to give a benefit to council tax payers.
- 15.2 The loans will be 'eliminated' on consolidation in to group accounts. Therefore, the prudential indicators set out in this report exclude these inter-group loans.
- 15.3 Where the Council finances loans to Group Companies by external borrowing, these external loans are taken account of in setting the borrowing limits. The limits set out in this report take into account the requirements set out in the approved Group Business Plans. The borrowing limits will need to be reviewed if the Council approves taking additional borrowing to fund new group company projects in the future. Borrowings by the Group Companies themselves do not count against the Council's borrowing limits.

REPORT ENDS