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Audit and Standards Committee – 13th February 2023

Report of the Director of Finance and Legal Services

Treasury Management

Purpose

1. The purpose of this report is:
 - To outline treasury activity in the year 2022/23 up to the end of December 2022.
 - To seek approval of the Treasury Strategy Statement 2023/24.

Recommendations

2. It is recommended:
 - That the Committee notes the treasury activities in 2022/23 outlined in this report.
 - That the Committee approves the Treasury Strategy 2023/24 attached as Appendix 2.
 - That the Committee authorises the Director of Finance and Legal to affect such borrowings, repayments and investments as are

appropriate and consistent with the approved Treasury Strategy and relevant guidance.

- The Committee approves a delegation to enable the Director of Finance and Legal Services to update the prudential indicators detailed in section 3 of Appendix 2 before this report is referred to full Council for approval.
- That the Committee refers all the above for approval by full Council at its meeting on 27th February 2023.

Background

3. At the time of writing this report, work was on-going to finalise the three-year capital programme for the Housing Revenue Account (HRA) which impacts the determination of the prudential indicators detailed in section 3 of the Treasury Strategy i.e. the Operational Boundary and Authorised Limit for external borrowing. The HRA capital programme will be reported to Cabinet for approval on 16th February 2023. As the indicators may change when the HRA capital programme is finalised, delegation is sought for the Director of Finance and Legal Services to amend the indicators before the Treasury Strategy is approved by Council on 27th February.
4. Treasury Management entails the management of the Council's cash flows, its borrowings and investments, the management of the associated risks and the pursuit of the optimum performance or return consistent with those risks.
5. The Council undertakes treasury management activity on its own behalf and as administering authority for the West Midlands Debt Administration Fund (WMDAF). We are responsible for administering capital funding of £740m on our own account and another £78m on behalf of other West Midlands councils in respect of the WMDAF. The treasury function is governed by the Council's Treasury Policy Statement and Treasury Management Practices.
6. Our borrowing and investment activities in the current year have been undertaken in the context of increasing interest rates. The Bank Base Rate has been increased a number of times since the previous Treasury Management report was taken to this Committee (see Appendix 2 for more information).
7. Appendix 2 contains some detailed economic commentary but in summary the Monetary Policy Committee is expected to increase interest rates further to counter inflationary pressures (which are expected to fall slowly through 2023 and 2024).

8. CIPFA released the new editions of the Treasury Management Code and Prudential Code in December 2021. Due to the timing of the release, local authorities were not required to comply with the reporting requirements of the codes until 2023/24. The main changes relate to further restrictions and reporting requirements for commercial investments as well as the introduction of a liability benchmark which we have added into our prudential indicators for 2023/24.
9. In November 2020 HM Treasury prohibited access to Public Works Loans Board loans for the purpose of funding investments purely for commercial income, and the revised code prohibits local authorities any new commercial investments altogether with immediate effect. The revised code requirements on commercial investments do not impact on Dudley MBC as we already have a long-standing policy to refrain from investing in assets purely for revenue income or other financial return (see Section 7 of the Treasury Management Strategy).

Treasury Activity 2022/23 - Dudley Fund

10. Treasury activities in the current year have been undertaken in the context of the Treasury Strategy Statement 2022/23 approved by Audit Committee and Full Council in February 2022. In that document we anticipated that long term borrowing would be required in the next 12 months due to cashflow need.
11. Our investments up to 5th January 2023 have averaged £22.5m. The average return on these investments since the start of the year was 1.15% (however the weighted average interest rate of investments held at 6th January 2023 was 3.02%). All investments were placed with institutions that satisfied the criteria for credit-worthiness set out in the Treasury Strategy Statement 2022/23. The performance of our investments is largely dependent on movements in short-term (up to one year) rates. Our investment activity for 2022/23 (to date) is set out in more detail in Appendix 1.
12. The returns outlined above have been achieved without compromising on the security of the Council's investments. We have maintained and continue to maintain an approved investment list that sets the highest rating standards. We have an account with the Government's Debt Management Office (DMO) which provides maximum security but relatively low returns. We use this account extensively due the fact that we have strict credit criteria in our Investment Strategy for non-government counterparties.
13. The average value of long-term borrowings up to the end of December 2022 was £587.3 million. The average rate of interest on these borrowings was 3.76% and they were due to mature on dates ranging

from the current year to 2072. To date five new loans have been taken out in 2022/23. All of these loans were with PWLB; one for £15m at a rate of 3.87% with a duration of 50 years, one for £10m at a rate of 4.03% with a duration of 6 years and most recently 3 loans taken in January for £5m each at a rate of 4.13% with maturity dates in 2029.

14. We are monitoring cash flows and interest rates closely and anticipate that, due to the Council's capital programme, planned use of reserves and loan maturities, further borrowing is likely to be taken by the end of the 2022/23 financial year.

Treasury activity 2022/23 - WMDAF

15. The Council has taken 4 short term loans in the year to date to manage daily cash flow for the WMDAF. The average value of the borrowing has been £2.6m at an average rate of 2.3% for an average duration of 151 days. The latest estimate of interest payable by members of the WMDAF in 2022/23 is 5.3%.
16. The Council has made two short term investments in the year to manage daily cash flow for the WMDAF. The average value of the investments have been £2.5m at an average rate of 1.5% for an average duration of 18 days.

Treasury Strategy Statement 2023/24

17. The Treasury Strategy Statement covers our latest capital funding requirements, our view of interest rate movements and our strategy for borrowing and investment in the light of that view. As such, it needs to be reviewed annually. The proposed Treasury Strategy Statement for 2023/24 is attached as Appendix 2.
18. Our expectations for interest rates advised by our treasury advisors Link Group, which will be subject to continuous review with our treasury advisors, are as follows:
 - **Short-term rates.** The Bank Rate is expected to rise to 4.25% by March 2023 but drop down to 4.00% by March 2024.
 - **Medium-term rates.** 5-year PWLB certainty rate is expected to be 4.20% in March 2023 and drop slightly to 3.90% by March 2024.
 - **Long- term rates.** 50-year PWLB certainty rate is expected to be 4.30% in March 2023 and drop to 3.90% by March 2024.
19. The Local Government Act 2003 introduced a system of “prudential borrowing” allowing councils to set their own borrowing limits subject to

criteria of prudence and affordability. These criteria are set out in more detail in the Chartered Institute of Public Finance & Accountancy (CIPFA) Prudential Code which specifically requires us to set a number of prudential indicators. The proposed indicators that relate to treasury management are set out in the Treasury Strategy Statement.

20. In order to protect the Council's position if an individual or organisation were to act upon the views expressed in this report, we have deemed it necessary to produce a disclaimer which is shown as a note at the head of the report and Appendix 2.

Finance

21. Forecasts of performance against budget for treasury management activities are sensitive to movements in cash flow and interest rates.

Law

22. The Council has adopted CIPFA's Treasury Management in the Public Services: Code of Practice 2021 which requires the Council to approve a treasury management strategy before the start of the financial year and provide a mid-year update on treasury management activity. In addition, the Department for Levelling Up, Housing and Communities (DLUHC) issued revised Guidance on Local Authority Investments in 2010 that required the Council to approve an investment strategy before the start of each financial year. This report fulfils the legal obligation under the Local Government Act 2003 to have regard to both the CIPFA code and the DLUHC guidance.

Risk Management

23. Treasury Management, by its nature entails the management of financial risks, specifically credit risk for investments which is mitigated by limiting acceptable counterparties to those of the highest credit quality and imposing counterparty limits for non-government institutions; and interest rate risk which is mitigated by prudential indicators detailed in Appendix 2.

Equality Impact

24. The treasury management activities considered in this report have no direct impact on issues of equality.

Human Resources / Organisational Development

25. There are no Organisational Development/Transformation implications associated with this report.

Commercial / Procurement

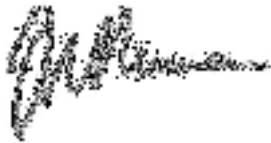
26. The over-riding purpose of the Council's Treasury Strategy is day to day cash management and not income generation. The strategy prioritises security and liquidity of cash investments over yield. Once those are met, we aim to secure the maximum yield from our investments held with the small number of counterparties that meet the strict criteria laid out in our Annual Investment Strategy.

Environment / Climate Change

27. The Council is required to consider environmental, social and governance considerations when making investments. It will not invest in fossil fuel companies.

Council Priorities and Projects

28. Treasury Management supports the Council's capital investment priorities as set out in the approved Capital Strategy.



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List of Background Papers

- Treasury Policy Statement, Treasury Management Practices and Schedules to the Treasury Management Practices.
- The Local Government Act 2003
- The Prudential Code for Capital Finance in Local Authorities (CIPFA)
- Guidance on Local Government Investments Issued by the Secretary of State under section 15(1)(a) of the Local Government Act 2003
- Code of Practice for Treasury Management in the Public Services (CIPFA)

Investment Activity 2022/23 to 5th January 2023

Counterparties	Number of investments	Average value £ million	Average rate %	Average duration (days)
Debt Management Office	177	14.76	1.82	10
Other Local Authorities	None	N/A	N/A	N/A
Bank of Scotland Call Account	n/a	0.04	0.00	Call
Santander Call Account	n/a	4.17	0.60	Call
Santander Notice Account	n/a	0.02	1.03	35 day notice
HSBC Call Account	n/a	3.20	0.05	Call
HSBC Notice Account	n/a	0.02	1.39	30 day notice
Barclays Call Account	n/a	0.31	0.21	Call

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DUDLEY METROPOLITAN BOROUGH COUNCIL TREASURY STRATEGY STATEMENT 2023/24

1.0 Introduction

1.1 This Treasury Strategy Statement details the expected activities of the treasury function in the financial year 2023/24. The suggested strategy is based upon officers' views of interest rates as advised by external advisors, supplemented with leading market forecasts. It should be noted that the use of expert external advisors does not remove the responsibility of members and officers for treasury management functions and that those functions cannot be delegated to any outside organisation. The strategy covers:

- the current portfolio position
- prudential and treasury indicators
- prospects for interest rates
- temporary investment strategy
- requirements and strategy for long-term borrowing
- debt rescheduling and premature repayment opportunities
- treasury implications for the Housing Revenue Account (HRA)

2.0 Current Portfolio Position

2.1 The Council's estimated debt position as at 1st April 2023 is as follows:

	£m
Long-term debt:	
- PWLB fixed rate	571.3
- PWLB variable rate	0.0
- Market fixed rate	31.0
- Market LOBO*	10.0
Short-term debt	20.0
Total debt	632.3

*Lenders Option Borrowers Option (LOBO). This loan was at a fixed rate of 4.6% until February 2009 after which the rate may be varied at the lender's option. If the lender exercises this option to vary the rate then we, as the borrower, have the option to repay the loan.

2.2 The average rate of interest on the above debt is expected to be 3.87%.

2.3 The average level of investments held by the Council during 2022/23 to December 2021 was £22.6m. Cashflow monitoring indicates that long term borrowing is likely to be required in the next 12 months.

2.4 The Council also administers the debt of the former West Midlands County Council on behalf of the West Midlands districts. The estimated debt position at 1st April 2023 is as follows:

	£m
Long-term debt:	
- PWLB fixed rate	55.5
- Market LOBO	10.0
Short-term debt	1.5
Total debt	67.0

2.5 The average rate of interest charged to the West Midlands fund is expected to be 5.30%.

3.0 Prudential & Treasury Indicators

3.1 Under the Local Government Act 2003 and the Prudential Code for Capital Finance in Local Authorities, local authority capital spending and its borrowing to fund that spending is limited by what is affordable, prudent and sustainable. The Prudential Code sets out a number of indicators that enable the authority to assess affordability and prudence. The following indicators are relevant for the purposes of setting an integrated treasury management strategy.

3.2 Treasury Indicators in the Prudential Code

The Prudential Code requires that the total external debt does not exceed the Authorised Limit for external debt and only exceeds the Operational Boundary for external debt temporarily on occasions due to variation in cash flow.

These external debt indicators are intended to ensure that levels of external borrowing are affordable, prudent and sustainable. The

authorised limit for external debt is a statutory limit (section 3 of the Local Government Act 2003) that should not be breached under any circumstances. It has been calculated to take account of the Council's capital expenditure and financing plans and allowing for the possibility of unusual cash movements. The operational boundary for external debt has also been calculated with regard to the Council's capital expenditure and financing plans allowing for the most likely, prudent, but not worst-case scenario for cash flow. Temporary breaches of the operational boundary, due to variations in cash flow, will not be regarded as significant. Actual external debt represents the closing balance for borrowing and other long-term liabilities.

	2021/22	2022/23 Revised	2023/24 Revised	2024/25 Revised	2025/26 Revised
	£m	£m	£m	£m	£m
Authorised limit for external debt *:		872	886	892	820
Borrowing	n/a				
Other long term liabilities	n/a	12	12	11	9
Total	n/a	884	898	903	829
Operational boundary *:	n/a	735	825	825	782
Borrowing					
other long term liabilities	n/a	12	12	11	10
Total	n/a	747	837	836	792
Actual External Debt:					
Borrowing	680.0	n/a	n/a	n/a	n/a
Other long term liabilities	14.4	n/a	n/a	n/a	n/a
Total	694.4	n/a	n/a	n/a	n/a

*Subject to finalisation of the Capital Programme report to Cabinet.

3.3 Gross Debt and the Capital Financing Requirement

This is a key indicator of prudence. In order to ensure that over the medium-term debt will only be for a capital purpose, the local authority should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the

current and next two financial years.

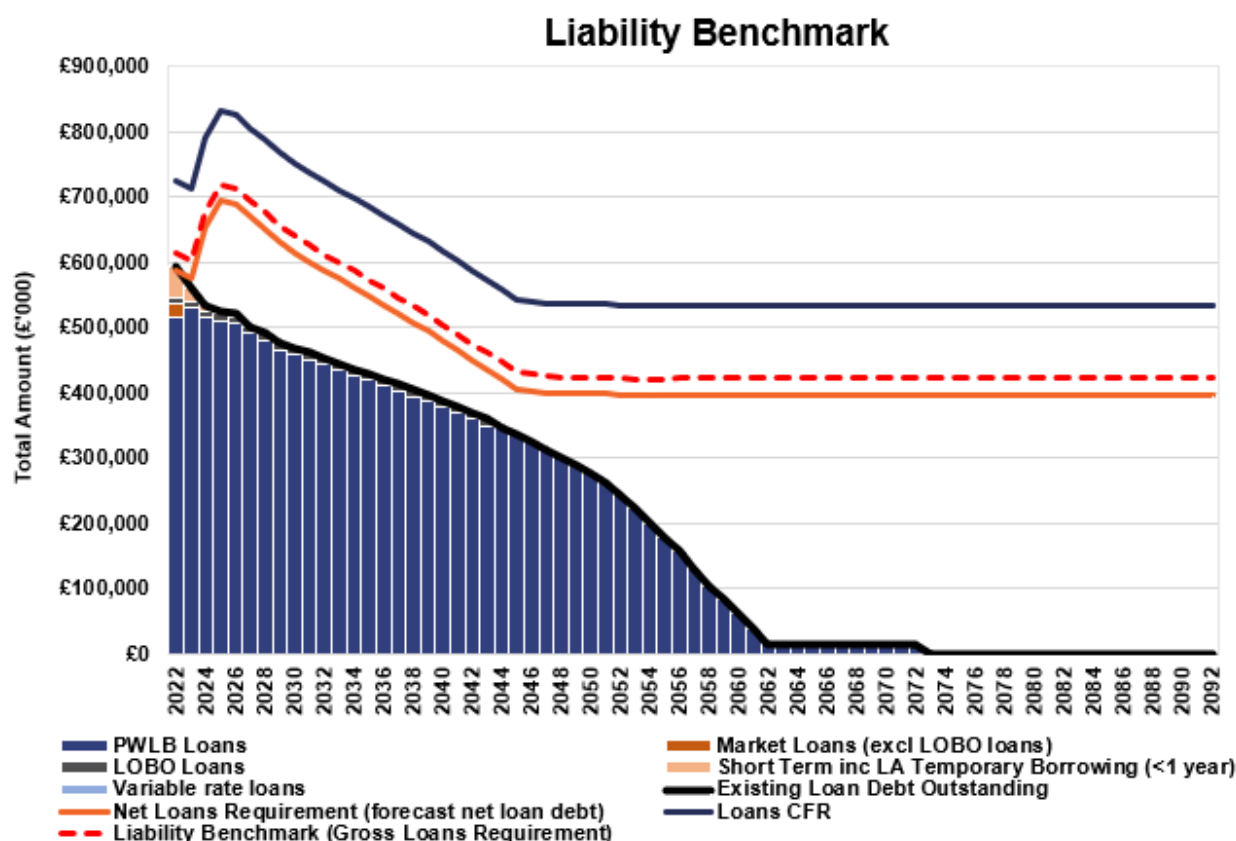
The Council has met this requirement in 2022/23 and expects to do so in future years. This view takes into account current commitments, existing plans and the proposals in the approved budget.

3.4 Liability Benchmark

The revised Prudential Code introduced a new prudential indicator called the Liability Benchmark (LB). The Council is required to estimate and measure the LB for the forthcoming financial year and the following two financial years, as a minimum. There are four components to the LB:-

- Existing loan debt outstanding – the Council's existing loans that are still outstanding in future years,
- Loans capital financing requirement (CFR) – this will include only approved prudential borrowing
- Net loans requirement – this is the Council's gross loan debt less treasury management investments at the last financial year end projected into the future
- Liability benchmark – (also known as the gross loans requirement) which is the net loans requirement plus short-term liquidity allowance.

As the chart shows there is currently a gap between the existing loan debt outstanding and liability benchmark this indicates that further borrowing is likely to be required in the next few years likely to be required in the next few years.



3.5 Interest rate exposures

These indicators allow the Council to manage the extent to which it is exposed to changes in interest rates. The upper limit for fixed interest reflects the fact that it is possible to construct a prudent treasury strategy on the basis of using only fixed rate debt and investments, so long as the maturity dates of these debts and investments are reasonably spread. The same does not apply to variable rates where a 100% exposure could lead to significant year on year fluctuations in the cost of debt. The upper limit for variable rate exposure allows for the use of variable rate debt to offset our exposure to changes in short-term rates on our portfolio of investments. This limit reduces over time as our strategy is to gradually reduce our level of investments.

	2022/23	2023/24	2024/25	2025/26
Upper limit for fixed interest rate exposure	100	100	100	100
Upper limit for variable rate exposure	10	10	10	10

3.6 Maturity structure of borrowing and investments

The maturity structure of fixed rate borrowing is designed to protect against excessive exposures to interest rate changes in any one period, in particular over the course of the next ten years.

Dudley MBC Maturity Indicator	Upper Limit %	Lower Limit %
Under 12 months	15	0
12 months and within 24 months	15	0
24 months and within 5 years	20	0
5 years and within 10 years	25	0
10 years and above	100	50

West Midlands Debt Administration Fund Loan Maturity Indicator *	Upper Limit %	Lower Limit %
Under 12 months	55	25
12 months and within 24 months	55	20
24 months and within 5 years	40	0

- * The WMADF will close in March 2026 so no new long term loans will be required. The above indicator is based on the maturity of the remaining loans in the fund.

3.7 Upper Limit for total principal sums invested over 364 days

The purpose of the limits for principal sums invested for periods longer than 364 days is to contain the Council's exposure to the possibility of loss that might arise as a result of having to seek early repayment of principal sums invested. On the basis of prudent treasury management the proposed upper limit on principal maturing in any one year for sums invested for over 364 days is £10m.

4.0 Economic Background

- 4.1 The current economic backdrop is one of stubborn inflationary pressures, the easing of COVID restrictions in most developed countries and the Russian invasion of Ukraine. The combination of these has led to greater volatility in the Bank Rate (and PWLB rates) throughout 2022. The Monetary Policy Committee (MPC) has raised the Bank Rate throughout 2022 and the most recent increase took the Bank Rate to 4.00% in February 2023. The market expects the rate to increase further (up to 4.5% by May 2023) but to then fall gradually through the second half of 2023/24 and beyond.

- 4.2 The CPI inflation figure for the final quarter of 2022 peaked at 11.1%, however as further increases in gas and electricity price caps are pencilled in for April 2023 it is possible that inflation will reach even higher levels before it is expected to drop down later in 2023.
- 4.3 Although UK unemployment fell to a 48-year low in 2022 of 3.6% the predictions for GDP are that there will be further contraction. This is the same for all major worldwide economies.

5.0 Prospects for Interest Rates

- 5.1 The Council's Treasury Advisor, Link Asset Services, has provided the following forecast :

	December 2022 (Actuals)	December 2023 (Forecasts)	December 2024 (Forecasts)	December 2025 (Forecasts)
Bank Rate	3.50%	4.50%	3.25%	2.50%
5yr PWLB rate	4.20%	4.00%	3.50%	3.10%
10yr PWLB rate	4.30%	4.10%	3.60%	3.30%
25yr PWLB rate	4.60%	4.40%	3.90%	3.50%
50yr PWLB rate	4.30%	4.10%	3.60%	3.20%

- 5.2 As per 4.1 The Bank rate was increased to 4.00% in February 2023, Link are expecting the rate to increase further in 2023 but to peak at 4.50%. The difficulty then is when to start reducing the rate. This will depend on the inflation levels - cut too soon, and inflationary pressures may well build up further; cut too late and any downturn or recession may be prolonged.
- 5.3 Link Asset Services will continue to monitor economic data releases and information released by the Monetary Policy Committee (MPC) who set the Bank Rate. The economy is also obviously impacted by the ongoing conflict between Russia and Ukraine and tensions between other countries could also have a negative economic impact.
- 5.4 Our overall strategy will be based on the projections above. However, we will maintain flexibility to take account of unexpected variations from our forecast.

6.0 Annual Investment Strategy

6.1 Our investment activities are subject to government guidance issued under Section 15(1) (a) of the Local Government Act 2003. This section of the Treasury Strategy Statement constitutes an “Annual Investment Strategy” produced in accordance with the guidance.

6.2 The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves held. We have a policy of keeping cash balances at minimum levels by maximising the use of internal borrowing to finance capital expenditure.

6.3 Both the CIPFA Code and the Department for Levelling Up, Housing and Communities (DLUHC) 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 Council’s primary objective in relation to the investment of public funds remains the security of capital. The liquidity or accessibility of the Council’s investments followed by the yields earned on investments is important but are secondary considerations.

6.4 Strategy for “specified investments”

6.4.1 The Council will make use of specified investments (as defined within the terms of the government guidance). These are investments that satisfy the following conditions:

- a) The investment is denominated in sterling and any payments or repayments in respect of the investment are payable only in sterling.
- b) The Council may require that the investment be repaid or redeemed within 12 months of the date on which the investment was made.
- c) The making of the investment is not defined as capital expenditure by legislation.
- d) The investment satisfies either of the following conditions:
 - I. The investment is made with the UK government, a local authority, a parish council or a community council, or
 - II. The investment is made with a body or in an investment scheme of high credit quality.

6.4.2 The Council will be prepared to lend to the West Midlands Combined Authority. Such lending will be as part of arrangements agreed with the Combined Authority and other constituent authorities.

6.4.3 For the purpose of this strategy a body or investment scheme is deemed to be of high credit quality if it has minimum short-term ratings of F1 (Fitch), P1 (Moody's), and A1 (Standard and Poors).

6.4.4 The Council will also limit risks by applying lending limits and criteria for "high credit quality" as shown below:

Specified Investments Counterparty	Minimum Short-term Credit Rating*	Maximum Investment per Counterparty	Time Limit
UK Banks	F1+/P1/A1+	£20m	3 months
	F1/P1/A1	£15m	1 month
UK Local Authorities	n/a	£20m	12 months
UK Government	n/a	none	none

*Fitch/ Moody's /S&P rating agencies respectively. Institutions must have the requisite rating at 2 of the 3 agencies.

6.4.5 Since the financial crisis of 2008, the Council has not allowed investments in non-UK institutions. The existing strategy is based on the implicit assumption that the UK Government would support a failing UK bank. This factor is less relevant in light of the Financial Services (Banking Reform) Act 2013 and proposed regulations. That said, current cash flow predictions do not suggest that there is any compelling need to widen the investment strategy to non-UK institutions and so there is no proposal to change.

6.4.6 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 and reports in the quality financial press. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may meet the credit rating criteria.

6.4.7 When deteriorating financial market conditions affect the creditworthiness of all organisations, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Authority 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 Authority's cash balances, then the surplus will be deposited with the UK Government, via the Debt Management Office for example, or with other local authorities. This will cause a reduction in the level of investment income earned, but will protect the principal sum invested.

6.4.8 The only indicators with prescriptive values remain to be credit ratings. Other indicators of creditworthiness are considered in relative rather than absolute terms.

6.4.9 If conditions in the financial markets worsen during 2023/24 or other factors indicate that increased security of Council funds is required, the Director of Finance and Legal Services may impose tighter restrictions on the type of investments and institutions used by the Council, than those detailed in this strategy.

6.4.10 The Council currently banks with HSBC; however the Council is changing banks during 2023/24 to Lloyds Plc. At the present time, both HSBC and Lloyds Plc meet the minimum credit criteria. Even if the credit rating of the Council's main bank falls below the Council's minimum criteria the main bank will continue to be used for short term liquidity requirements (overnight and weekend investments) and business continuity arrangements.

6.5 *Strategy for "non-specified investments"*

6.5.1 Non-specified investments are those that do not meet the criteria for a specified investment detailed in 6.4.1 above. The Council does not intend to make any investments denominated in foreign currencies, or any that are defined as capital expenditure by legislation such as company shares. Neither is there an intention to make new long term investments, especially in the light of maximising the length of any non-government investment to 3 months irrespective of its credit quality. Therefore the Council will not place its funds with non-specified investments.

6.6 *Liquidity of investments*

6.6.1 In determining the maximum period for which investments may be held, we will have regard to our most recent cash-flow forecast. We will not enter into an investment where our cash-flow forecast indicates that, as a result of that investment, we would be forced to borrow money at a later date that we would not otherwise have had to borrow.

6.7 *Environmental, Social & Governance (ESG) Considerations*

- 6.7.1 The Council is required to consider environmental, social and governance considerations when making investments. It will not invest in fossil fuel companies.

7.0 Policy on Non-Financial Investments

- 7.1 Investment in non-financial assets including property is not part of the Council's Treasury Management Strategy. The Council will incur capital expenditure on acquisition or development of property only where the primary purpose is regeneration and/or service delivery, and then only where a development would not happen without Council involvement, and the potential regeneration gain justifies any financial or other risks. It will not invest in property for the sole or primary purpose of revenue income or other financial return.
- 7.2 The only non-treasury investments currently held by the Council are shares held with Birmingham Airport which were valued at £16.8m at 31st March 2022. These are held as a service type investment as they were not purchased in order to generate a financial return; rather they are for regeneration purposes only. There are no current plans to make any further non-treasury investments.

8.0 Policy on the Use of Financial Derivatives

- 8.1 A financial derivative is a contract whose value is based on, or "derived" from, an underlying financial instrument such as a loan. Local authorities have previously been able to make use of financial derivatives embedded into loans and investments, both to reduce interest rate risk (e.g. forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans).
- 8.2 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 CIPFA Code requires authorities to clearly detail their policy on the use of derivatives in the annual strategy.
- 8.3 The Council does not intend to use standalone financial derivatives (such as swaps, forwards, futures and options). Should this position change, the Council may seek to develop a detailed and robust risk management framework governing the use of derivatives, but no change in strategy will be made without full Council approval.

9.0 Requirements and Strategy for Long-Term Borrowing

- 9.1 The primary factor in determining whether we undertake new long-term borrowing will be cash flow need. We will seek to minimise the time between borrowing and anticipated cash flow need, subject to the need to maintain day to day liquidity.
- 9.2 The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. The Council's strategy is to maintain borrowing and investments at a minimum (well below their underlying levels) thereby maximising the use of internal borrowing. This keeps borrowing costs lower than they would otherwise be and keeping cash balances low reduces credit risk.
- 9.3 The balance sheet forecast indicates a requirement to increase the level of external borrowing in the medium and long term. Our interest rate expectations (outlined in 5.1) provide a variety of options on the type of borrowing we will undertake:
- That short-term variable rates will be good value compared to long-term rates and are likely to remain so for potentially at least the next couple of years. Best value will therefore be achieved by borrowing short term at variable rates in order to minimise borrowing costs in the short term.
 - That the risks intrinsic in the shorter term variable rates are such, when compared to historically relatively low long term fixed funding, which may be achievable in 2023/24, that the Council will maintain a stable, longer term portfolio by drawing longer term fixed rate funding at a marginally higher rate than short term rates.
- 9.4 Against this background caution will be adopted with the 2023/24 treasury operations. The Director of Finance and Legal Services will monitor the interest rate market and adopt a pragmatic approach to changing circumstances.

Sensitivity of the forecast - The main sensitivities of the forecast are likely to be the two scenarios below. In conjunction with the treasury advisers, we will continually monitor both the prevailing interest rates and the market forecasts, adopting the following responses to a change of sentiment:

- If it were felt that there was a significant risk of a sharp rise in long and short term rates, perhaps arising from a greater than expected increase in world economic activity, 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.
- If it were felt that there was a significant risk of a sharp fall in long and short term rates, due to growth rates remaining low or weakening, then long term borrowings will be postponed.

9.5 With respect to the West Midlands Debt, variances due to timing differences between the maturity profile of the debt and repayments from authorities can be managed by short term borrowing in 2023/24.

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

- Public Works Loans Board
- Any institution approved for investments (above)
- Any other bank or building society authorised to operate in the UK
- UK public and private sector pension funds (except the West Midlands Pension Fund)

In addition, capital finance may be raised by finance leases and similar arrangements which may be classed as debt liabilities.

10.0 Debt Rescheduling and Premature Repayment Opportunities

10.1 We may consider rescheduling or premature repayment with the following aims:

- the generation of cash savings at minimum risk
- in order to help fulfil the strategy outlined in 9 above
- in order to enhance the balance of the long-term portfolio (by amending the maturity profile and/or the balance of volatility)

10.2 Any rescheduling or premature repayment will be reported to an appropriate committee at the meeting following its implementation.

11.0 HRA Self Financing

11.1 On 1st April 2012, the Council notionally split each of its existing long-term loans into General Fund and HRA pools. In the future, new long-

term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g. premiums and discounts on early redemption) will be charged/ credited to the respective revenue account.

- 11.2 Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative. An average of this notional balance will be calculated annually and interest transferred between the General Fund and HRA at an internally determined rate of interest, adjusted for risk.

12.0 Training

- 12.1 CIPFA's Code of Practice requires the Director of Finance and Legal Services to ensure that all members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities. Relevant training is provided by Link Asset Services to the members of the Audit & Standards Committee and other members of the Council.
- 12.2 The Council recognises the importance of ensuring that all staff involved in the treasury management function are fully equipped to undertake the duties and responsibilities allocated to them. It will therefore seek to appoint individuals who are both capable and experienced and will provide training for staff to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills. The Director of Finance and Legal Services will recommend and implement the necessary arrangements.

13.0 Treasury Management Advisors

- 13.1 The Council uses Link Asset Services as its external treasury management advisers. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.
- 13.2 It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council maintains the quality of the service with its advisors by holding regular meetings and tendering periodically for the provision of treasury management advice.

13.3 The Council receives the following services from Link Asset Services:

- a. Credit advice
- b. Investment advice
- c. Technical advice
- d. Economic & interest rate forecasts
- e. Workshops and training events for officers and members