

St Albans City and District Council

Treasury Management Strategy Statement Minimum Revenue Provision Policy Statement and Annual Investment Strategy

2018/19

1. Introduction

1.1 Background

The Council is required to operate a balanced budget, which broadly means that cash expenditure during the year will be met by cash raised. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties 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 are an important factor in calculating the borrowing need of the Council. This relates essentially to the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. The management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.

CIPFA defines treasury management as:

"The management of the local authority's borrowing, 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."

1.2 Reporting requirements

The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.

Treasury Management Strategy Statement (this report) - The first, and most important, report covers:

- the capital plans (including prudential indicators);
- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

A mid year treasury management review – This will update members with the progress of the capital position, amending prudential indicators as necessary. It will also provide an update on whether the treasury strategy is meeting the Council's requirements or if any policies require revision.

An annual treasury report – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations, compared to the estimates within this strategy.

Scrutiny

The reports above are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Audit Committee.

Capital Strategy

In December 2017, CIPFA issued revised Prudential and Treasury Management Codes. As from 2019/20, all local authorities will be required to prepare an additional report, a Capital Strategy report, which is intended to provide the following: -

- a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed
- the implications for future financial sustainability

The aim of this report is to ensure that all elected members on the full council fully understand the overall strategy, governance procedures and risk appetite entailed by this Strategy.

The Capital Strategy will include capital expenditure, investments and liabilities and treasury management in sufficient detail to allow all members to understand how stewardship, value for money, prudence, sustainability and affordability will be secured.

1.3 Treasury Management Strategy for 2018/19

The strategy for 2018/19 covers two main areas:

Capital issues

- the capital plans and the prudential indicators;
- the minimum revenue provision (MRP) policy.

Treasury management issues

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and
- policy on use of external service providers.

These elements cover the requirements of the Local Government Act 2003; the CIPFA Prudential Code; Department for Communities and Local Government (DCLG) MRP Guidance; the CIPFA Treasury Management Code; and DCLG Investment Guidance. The Prudential Code and Treasury Management Code of Practice were updated by CIPFA in December 2017. Both these codes are effective from 2018/19 financial year.

1.4 Training

The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This applies especially to members responsible for scrutiny. For this Council, the responsible officer is

the Deputy Chief Executive (Finance). Treasury training is made available to members of the Audit Committee from time to time.

The needs of the Council's treasury management staff for training in investment management are assessed every year as part of the staff appraisal process. Training needs are also assessed when the responsibilities of individual members of staff change. Officers attend training courses, seminars and conferences provided by Link Asset Services and CIPFA, regularly.

1.5 Treasury management consultants

The Council uses 'Link Asset Services, Treasury Solutions' as its external treasury management advisors.

The Council recognises that it is responsible for treasury management decisions. Undue reliance is not placed upon external service providers.

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 will ensure that the terms of their appointment, and the methods by which their value will be assessed, are properly agreed and documented. They will also be subjected to regular review.

2. Capital Issues

2.1 Capital Plans

The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

2.2 Capital Prudential Indicators 2018/19 – 2020/21

Capital Expenditure. This prudential indicator is a summary of the Council's capital expenditure plans as agreed by Council in December 2017.

Capital Expenditure	2016/17 Actual	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
	£'M	£'M	£'M	£'M	£'M
General Fund (GF)	7.9	18.9	40.4	47.8	-
Housing Investment Programme (HIP)					
Housing stock enhancements	9.2	5.8	10.1	6.9	4.6
Non-HRA items	5.1	8.3	6.2	7.6	1.7
Total HIP	14.3	14.1	16.3	14.5	6.3
Total capital expenditure	22.2	33.1	56.7	62.3	6.3

General Fund capital expenditure is forecast to be £40.4 million in 2018/19. Plans include Commercial and Development Schemes including the Civic Centre Opportunity Site (£26.7m); the Harpenden Leisure and Cultural Development (HL&C) project (£9.2M); and the Museum of St Albans (MoSTA) development project (£2.5M).

Capital proposals for 2019/20 include the continuation of the Harpenden Leisure & Culture Development project and Commercial and Development Schemes. There are currently no new schemes proposed in 2020-21.

The HRA spend on continued enhancements to housing stock in 2018/19 is forecast to be £10.1 million, which will be met from housing rental income. Other housing expenditure is forecast to be £6.5 million, of which £5.5m is affordable housing and £0.6m Disability Facility Grants.

Capital financing. The tables below show how the capital expenditure plans above are being financed by capital or revenue resources. The funding as approved by Council in December 2017 has been updated with the estimated full capital receipt expected from the sale of properties on the former MOSTA site in 2018/19. Any shortfall of resources results in a funding need (borrowing), which in turn will result in an increase in MRP charge to the revenue account

Financing Total	2016/17 Actual £'M	2017/18 Estimate £'M	2018/19 Estimate £'M	2019/20 Estimate £'M	2020/21 Estimate £'M
Total Spend	22.2	33.0	56.7	62.3	6.3
Financed by:					
Capital Receipts	6.5	7.4	18.8	6.9	4.6
Capital Grants and contributions	2.3	3.9	1.2	0.7	0.6
Revenue/revenue reserves	7.3	7.2	5.9	7.2	1.1
Total Financed	16.1	18.6	25.8	14.7	6.3
Net funding need for the year	6.1	14.5	30.9	47.6	-
Financing GF	2016/17 Actual £'M	2017/18 Estimate £'M	2018/19 Estimate £'M	2019/20 Estimate £'M	2020/21 Estimate £'M
GF spend	7.9	18.9	40.4	47.8	-
Financed by:					
Capital Receipts	0.1	1.0	8.7	-	-
Capital Grants and contributions	1.3	3.3	0.6	0.1	-
Revenue/revenue reserves	0.4	0.1	0.3	0.1	-
GF financed	1.8	4.5	9.5	0.2	-
GF funding need for the year	6.1	14.5	30.9	47.6	-
Financing HIP	2016/17 Actual £'M	2017/18 Estimate £'M	2018/19 Estimate £'M	2019/20 Estimate £'M	2020/21 Estimate £'M
HIP spend	14.3	14.1	16.3	14.5	6.3
Financed by:					
Capital Receipts	6.4	6.4	10.1	6.9	4.6
Capital Grants and contributions	1.0	0.6	0.6	0.6	0.6
Revenue/revenue reserves	6.9	7.1	5.6	7.0	1.1
HIP financed	14.3	14.1	16.3	14.5	6.3
HIP funding need for the year	-	-	-	-	-

The General Fund (GF) capital programme is not fully funded by grants, receipts, revenue or other third party contributions and will require prudential borrowing. This may be from internal cash balances in the first place and external borrowing when cash balances become insufficient. The “funding need” increases each year will require an increase in charges to the GF by way of Minimum Revenue Provision (MRP) as shown in the second table in 2.3 below, though other aspects of some projects (e.g. income from facilities) can mitigate the overall impact of this.

Any shortfall in capital receipts and other funding will increase the funding need and the charge to the General Fund.

Key estimates relating to funding are:

- As discussed above officers are considering financing the capital content of supplier contract tenders. This is because the Council can obtain more favourable interest rates on borrowing than is generally available in the market to non-government organisations. The Council will have to fund the capital purchase from borrowing. It has been assumed that the charges for interest and MRP will be met from contract savings over the life of the assets.
- The funding of the GF capital programme is dependent upon capital receipts of £8.6M and £4m of grants and contributions over a three year period to 2019/20. This includes £1.4M from fundraising relating to the capital parts of the project and £8.6M from the MOSTA development. We have assumed that capital funding will be received in accordance with plans developed by Commercial & Development department.
- The Housing capital programme (HIP) is fully funded, based on retained capital receipts of £16.5m as at April 2017 and forecasted RTB receipts of £7.5m to 2020/21 (net of government share), totalling £ 24m.

2.3 The Council's Borrowing Need (the Capital Financing Requirement)

The second prudential indicator is the Council's Capital Financing Requirement (CFR). This shows the total of historic capital expenditure which has not yet been paid for from either revenue or capital resources. This can be met from internal borrowing (use of cash balances) or by external borrowing.

MRP/VRP: Minimum or Voluntary Revenue Provision as defined in 2.4 below

GF: the CFR balance increases each year as some projects are unfunded (i.e. not funded from capital receipts, grants etc.). The NMG and MoSTA projects are currently expected to be fully funded. However, the timing of receipts is such that short term borrowing will be required but this has a minimal impact on the CFR balance. In addition, any shortfall in funds raised will result in an increase in CFR and an increase in MRP charge to the GF. The 'Commercial and Development Department new projects' and Harpenden Leisure and Cultural Development projects are 'unfunded' during the period of this review. Prudential borrowing will be required and as internal cash balances are used up, external borrowing will be necessary. The impact of the increase in interest charges has been taken into account in the cash flow in section 3.1 below. MRP is discussed further in 2.4 below.

The project plans developed by Commercial & Development department show that longer term capital receipts and/or revenue income are expected to make the projects net cash flow positive over the life of the asset.

HRA: the HRA is fully funded and the decrease in HRA CFR represents the provisions made in the HRA revenue account for the repayment of debt.

2.4 Minimum Revenue Provision (MRP) policy statement or Debt Repayment Provisions Policy

The Council is required to put aside money for the financing of capital expenditure that has not been met from grants, contributions or capital receipts. It is also required to adopt a policy to determine the basic amount of this, called the minimum revenue provision (MRP). The Council is also allowed to undertake additional voluntary payments if it wishes (voluntary revenue provision (VRP)).

The Council's policy is that for all unsupported borrowing, MRP will be calculated using the Asset Life Method – i.e. the MRP will be based on the estimated life of the assets. This provides for a reduction in the borrowing over approximately the assets expected useful life.

Within the asset life method there is the option of providing MRP on a straight line basis or an annuity basis. For income producing assets where income is expected to increase over time, the asset value is high and the asset life is long, it is appropriate to use the annuity method. This takes into account the time value of money in that the annual MRP provision increases each year in line with an estimated interest rate. Council agreed at the 2013/14 budget setting that MRP be provided for Westminster Lodge over 35 years with an interest rate of 2.2%.

MRP is only chargeable in the year following completion of a project so for HL&C project the MRP charge is outside the period of this report. MRP is included for the Commercial and Development projects in 2020/21. . Significant borrowing is required for these projects and it is essential that the receipts and income from the projects are sufficient to cover the future MRP charges to the General Fund.

Under the Housing Self Financing reform, the HRA is required to charge depreciation on its assets, which has a revenue effect. The provision for depreciation provides cash for housing capital works.

There is no requirement to provide MRP in the HRA. Nevertheless, a voluntary provision has been incorporated into the 30 year business plan to enable repayment of debt to be made when it becomes due.

However, following intervention in rent setting by central government, whereby rents must be decreased by 1% per annum for four years from 2016/17, the HRA goes into a cash deficit in 2025/26. Officers are investigating ways of mitigating this but it is likely that re-financing of external borrowing will be required.

2.5 Affordability Prudential Indicators

The previous sections show capital expenditure and borrowing prudential indicators. However, within this framework we also need prudential indicators to assess the affordability of the capital investment plans i.e. the impact on revenue. These provide an indication of the impact of the capital investment plans on the Council's overall finances.

2.5.1 Ratio of financing costs to net revenue stream

This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income). This is set against the Council's net revenue stream for the General Fund (taxation and non-specific grant income) and the HRA.

	2016/17 Actual	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
General Fund	4.7%	9.3%	12.8%	14.5%	39.2%
HRA	58.1%	65.3%	78.7%	59.4%	61.7%

The estimates of financing costs include current commitments and the proposals in this report but do not take account of any positive budget variations as a result of undertaking these projects, for example, income from facilities, reduced running costs or reduced contract costs.

For the GF, the ratio is increasing significantly over the period under review. On the one hand, government funding is decreasing (on top of a basis of zero council tax increases for several years and 1.7% increase in 2018/19). On the other hand, MRP and interest charges are increasing due to the capital expenditure on Commercial and Development new projects, HL&C, Museums and capital equipment for contracts. Commercial and Development department forecast that increased charges will be met by an equivalent saving in costs or increased income over the life of the capital projects. The projects would then be cost neutral to the GF.

The HRA 30 year plan, presented in the budget, forecasts that from 2025/26 the HRA is unable to provide sufficient cash flow to maintain the housing stock at required levels and also provide for debt repayment. This is four years later than forecast in last year's TMSS due to a revision of rent levels post 2020/21.

2.5.4 HRA ratios

The first table below highlights how the debt revenue ratio decreases as debt is repaid at a greater rate than the reduction in rent revenue.

The next table shows how the debt per property decreases as debt is repaid. This is the case even though the number of properties reduces each year by an estimated net of the number of Right-To-Buy sales and the number of new house purchases.

HRA	2016/17 Actual	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
HRA debt	£180.4M	£173.4M	£165.4M	£158.4M	£149.4M
HRA revenues	£28.8M	£28.1M	£28.2M	£28.4M	£30.0M
Ratio debt to revenues	627.5%	616.4%	587.0%	558.7%	497.8%
HRA	2016/17 Actual	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
HRA debt	£180.4M	£173.4M	£165.4M	£158.4M	£149.4M
Number of HRA dwellings	4,899	4,887	4,900	4,935	4,974
Debt per dwelling	£36,827	£35,485	£33,758	£32,101	£30,039

3. Treasury Management Issues

The capital expenditure plans set out in Section 2 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with relevant professional codes. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

3.1 External Borrowing Requirements

The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue that needs to be considered.

The Council's treasury portfolio position at 31 March 2017, with forward projections are summarised below. The table shows the actual external debt (the treasury management operations), against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

The critical assumptions include: balanced GF and HRA budgets, increase in MRP and interest payments due to capital spend is matched by revenue savings, no slippage in capital programmes and funding assumptions and no change in working capital requirements.

External Debt £m	2016/17	2017/18	2018/19	2019/20	2020/21
	Actual £'m	Estimate £'m	Estimate £'m	Estimate £'m	Estimate £'m
Debt at 1 April	184	180	183	208	248
Expected change in Debt:					
Debt repayment	-4	-7	-18	-7	-9
Increase in external borrowings	0	10	43	47	0
Actual/Estimated gross debt at 31 March	180	183	208	248	239
The Capital Financing Requirement	211	217	238	277	263
Under / (over) borrowing	31	34	30	29	24

3.2 Borrowing Limits

The Operational Boundary

This focuses on the day-to-day treasury management activity. Total external borrowing is not normally expected to exceed this limit.

We need to ensure that we are able to borrow to meet the capital plans proposed in the budget and leave some headroom. The table below shows existing (2017/18) and proposed limits.

The limits have remained the same as those approved last year for 2017/18 and 2018/19. Due to the increased borrowing over the next 3 years the propose limits have increased by £10m from 2019/20:

Operational Boundary for External Debt	2016/17 Actual £'M	2017/18 Estimate £'M	2018/19 Estimate £'M	2019/20 Estimate £'M	2020/21 Estimate £'M
General Fund	16	110	110	120	120
HRA	192	192	192	192	192
Other Long Term Liabilities	5	5	5	5	5
Total	213	307	307	317	317

The Authorised Limit for external borrowing

This key prudential indicator represents a control on the maximum level of borrowing and represents a limit beyond which external borrowing is prohibited. This limit needs to be set or revised by the full Council. It gives some headroom for unforeseen requirements or delays in capital receipts.

The limits have remained the same as those approved last year for 2017/18 and 2018/19. Due to the increased borrowing over the next 3 years the propose limits have increased by £10m from 2019/20:

Authorised Limit for External Debt	2016/17 Actual	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
	£'M	£'M	£'M	£'M	£'M
General Fund	23	115	115	125	125
HRA	192	192	192	192	192
Other Long Term Liabilities	5	5	5	5	5
Total	220	312	312	322	322

Separately, the Council is also limited to a maximum HRA borrowing position through the Housing Self Finance regime of £192 million.

HRA debt limit	2016/17 Actual	2017/18 Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
	£'M	£'M	£'M	£'M	£'M
HRA debt cap	192.0	192.0	192.0	192.0	192.0
HRA CFR	179.0	173.4	165.4	158.4	149.4
Headroom	13.0	18.6	26.6	33.6	42.6

As mentioned in 2.5.1 above, the HRA generates sufficient cash to enable debt to be repaid on the due date until 2025/26. Officers are considering ways to address the shortfall beyond this date.

3.3 Prospects for Interest Rates

Link Asset Services' view on interest rates and economic outlook, as at 5th February 2018, is given below:

Link Asset Services Interest Rate View													
	Mar-18	Jun-18	Sep-18	Dec-18	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21
Bank Rate	0.50%	0.50%	0.50%	0.75%	0.75%	0.75%	0.75%	1.00%	1.00%	1.00%	1.25%	1.25%	1.25%
5yr PWLB rate	1.60%	1.60%	1.70%	1.80%	1.80%	1.90%	1.90%	2.00%	2.10%	2.10%	2.20%	2.30%	2.30%
10yr PWLB rate	2.20%	2.30%	2.40%	2.40%	2.50%	2.60%	2.60%	2.70%	2.70%	2.80%	2.90%	2.90%	3.00%
25yr PWLB rate	2.90%	3.00%	3.00%	3.10%	3.10%	3.20%	3.20%	3.30%	3.40%	3.50%	3.50%	3.60%	3.60%
50yr PWLB rate	2.60%	2.70%	2.80%	2.90%	2.90%	3.00%	3.00%	3.10%	3.20%	3.30%	3.30%	3.40%	3.40%

3.4 Treasury Management Indicators within the Treasury Management Code

The purpose of these indicators is to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set too restrictively they will impair the opportunities to reduce costs / improve performance. The indicators are:

Maturity Structure of Borrowing

This indicator is set to control the Council's exposure to risk from having to pay back significant amounts of debt all at the same time. The upper and lower limits on the maturity structure of fixed rate borrowings have been kept broad to allow flexibility in the structuring of debt:

	Upper Limit	Lower Limit	Estimated as at 1st April 2018
	%	%	%
Under 12 months	10.0	-	9.8
12 months and within 24 months	10.0	-	3.8
24 months and within 5 years	20.0	-	17.4
5 years and within 10 years	50.0	-	41.0
10 years and within 20 years	80.0	-	28.0
Over 20 years	80.0	-	-

The debt profile as at 1st April 2018 is based on the current known debt profile and an expectation of borrowing externally in March 2018 to fund the General Fund capital commitments in advance of receiving the capital receipt from the sale of properties on the former MOSTA site. The profile is within the current approved upper limits.

Principal sums invested for periods longer than 365 days

The limits have remained the same as those approved last year.

Limit on principal invested beyond 365 days	2018/19	2019/20	2020/21
	£m	£m	£m
Local Authorities	5.0	5.0	5.0
Other	1.0	1.0	1.0

3.5 Borrowing Strategy and Control of Interest Rate Exposure

The Council is currently maintaining an under-borrowed position, i.e. it is running down its investment balances rather than borrow. This strategy recognises that investment returns are low and counterparty risk is relatively high.

Against a background of risks within the economic forecast, caution will be adopted with the 2018-19 treasury operations. The Deputy Chief Executive (Finance) will monitor interest rates in financial markets. He will adopt a pragmatic approach to changing circumstances in deciding whether to take out fixed or variable rate loans.

* if it was felt that there was a significant risk of a sharp FALL in long and short term rates (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), 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 that currently forecast, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.

The Council may also borrow for short periods of time (normally for up to two weeks) to cover unexpected cash flow shortages.

Sources of Borrowing

The approved sources of long-term borrowing will be:

- Public Works Loans Board
- Any Institution approved for investment
- Any Bank or Building Society approved by the Bank of England Prudential Regulation Authority.

3.6 Policy on Borrowing in Advance of Need

The Council may borrow in advance of need for short periods where a review of capital spending profile and views on future interest rates makes it economically attractive.

3.7 Policy on charging interest to the Housing Revenue Account

The Council is free to adopt its own policy on sharing interest costs and income between the General Fund and Housing Revenue Account (HRA). This follows the reform of housing finance. The CIPFA Code recommends that authorities state their policy on this matter each year in their treasury management strategy.

On 1 April 2012, the Council assigned the long term HSF loan to the HRA pool. New long-term loans borrowed will be assigned in their entirety to either the General Fund or

the HRA pool. Interest payable and other costs/income arising from long-term loans (e.g. premiums and discounts on early redemption) will be allocated in line with each specific loan.

An HRA cash flow balance is calculated each month and interest on this balance transferred between the General Fund and HRA. This is at the monthly net average rate earned by the Council on its portfolios of treasury investments and any short-term borrowing.

3.8 Investment Policy and Annual Investment Strategy

Investment Policy: The Council's investment policy has regard to the DCLG's Guidance on Local Government Investments ("the Guidance"). It has regard also to the 2017 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). The Council's investment priorities will be:

- Security; then
- Liquidity; then
- Return.

The Council expects institutions it deposits funds with, through its treasury management function, to comply with internationally accepted norms. These include norms for the environment, human rights, working conditions, corruption and controversial weapons. The Council will seek to avoid placing funds with institutions that do not have a similar responsible investment policy.

Investment Strategy: To minimise the risk to investments, the Council has stipulated the minimum acceptable credit quality of counterparties for inclusion on the lending list (see Appendix 1). Other information sources used will include the financial press, share price and other such banking sector information. The objective is to establish the most robust scrutiny process on the suitability of potential investment counterparties.

Investments will 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).

For cash flow generated balances, the Council will seek to use its business reserve accounts, 15 and 30 day notice accounts, and short-dated deposits (overnight to three months). In this way it will benefit from the compounding of interest.

The Deputy Chief Executive (Finance) will maintain a counterparty list in compliance with the following criteria. He will revise the criteria and submit them to Council for approval as necessary.

3.9 Creditworthiness policy

3.9.1 Credit Ratings

The Council applies the creditworthiness service provided by Link Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following:

- credit watches and credit outlooks from credit rating agencies;
- Credit Default Spreads (CDS) to give early warning of likely changes in credit ratings;
- sovereign ratings to select counterparties from only the most creditworthy countries.

This results in three suggested credit assessments as follows:

- A) Based on the credit ratings of the agencies only
- B) Adjusted for watch/outlook
- C) Where applicable the end result is adjusted for CDS information with a manual override.

These indicate an overall assessment of the relative creditworthiness of counterparties at increasing levels of risk aversion.

This modelling approach combines credit ratings, credit Watches and credit Outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments.

The Link Asset Services' creditworthiness service uses a wider array of information than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

Officers propose to continue to use the lowest risk rating 'C' for all investments.

3.9.2 Credit Periods

Link Asset Services colour codes are used by the Council to determine the suggested duration for investments. The Council will therefore use counterparties within the durational bands shown in Appendix 1.

Officers propose that the Council continue to use up to the maximum investment duration indicated by Link Asset Services in the 'C' risk rating category.

3.9.3 Country Limits

Treasury policy is that 20% of funds invested, measured at the time the investment is made, can be invested in non-UK banks. These banks must be members of the Organisation for Economic Co-operation and Development (OECD). A list of current members is at Appendix 2.

Officers propose no change to these limits.

3.9.4 List of Counterparties

The application of credit ratings, credit periods and country limits lead to an amended list of counterparties each with 3 credit assessments with associated maximum investment durations.

All credit ratings will be monitored weekly. The Council is alerted to changes to ratings of all three agencies 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;

- 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 recall or sale of all other existing investments with the affected counterparty.

An example list of counterparties is shown at Appendix 1. Link Asset Services update the list on a weekly basis.

3.9.5 Counterparty Limits

Counterparty limits for value and period by type of counterparty are proposed by officers, in consultation with the Resources Portfolio Holder. The objective is to have a mix of investments, limiting exposure to any one counterparty and limiting exposure to long term deposits.

Officers propose no change to the counterparty limits, which are shown at appendix 4.

3.9.6 Non-specified investments

The Council is required to state whether it is intending to use any of what the Government calls "Non-specified investments" (See Appendix 3). The Council's policy is that the only situation where we will use these is in the case of long-term investments, (i.e. those that would meet the definition of a specific investment, but for the fact that they are due to mature 12 months or longer from the date of arrangement).

The limit for these Non-Specified investments remains at £5m.

Appendices

1. Link Asset Services listing of Qualifying Counterparties (as at 05/01/18)
 2. List of OECD members (January 2018)
 3. Treasury Management Criteria Summary
 4. Example of weekly investment list
 5. Four Clauses adopted from CIPFA's Treasury Management Code of Practice
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Appendix 1

Link Asset Services listing of Qualifying Counterparties (as at 05/01/18)

Showing suggested maximum duration of investment.

Link Asset Services methodology list of approved counterparties

Any values highlighted in yellow have undergone a change in the past 7 days.

Counterparty	Fitch Ratings			Moody's Ratings			S&P Ratings			Suggested Duration	Watch/ Outlook Adjusted	CDS Price	CDS Status	CDS Adjusted with manual override)	
	Long Term	Short Term	Viability	Support	Long Term	Short Term	Long Term	Short Term							
Australia Banks	SB	AAA			SB	Aaa		NO	AAA		16.11				
	SB	AA-	F1+	aa-	SB	Aa3	1	P-1	NO	AA-	A-1+	O-12 mths	41.79	●	O-12 mths
	SB	AA-	F1+	aa-	SB	Aa3	1	P-1	NO	AA-	A-1+	O-12 mths	44.66	●	O-12 mths
	SB	A	F1	a	SB	A2	3	P-1	NO	A	A-1	R-6 mths	R-6 mths		R-6 mths
	SB	AA-	F1+	aa-	SB	Aa3	1	P-1	NO	AA-	A-1+	O-12 mths	43.61	●	O-12 mths
SB	AA-	F1+	aa-	SB	Aa3	1	P-1	NO	AA-	A-1+	O-12 mths	44.58	●	O-12 mths	
Belgium Banks	SB	AA-			SB	Aa3		SB	AA		13.20				
	SB	A+	F1	a	SB	A1	1	P-1	SB	A	A-1	R-6 mths	R-6 mths		R-6 mths
SB	A	F1	a	SB	A1	5	P-1	PO	A	A-1	R-6 mths	R-6 mths			R-6 mths
Canada Banks	SB	AAA			SB	Aaa		SB	AAA		33.84				
	SB	AA-	F1+	aa-	SB	A1	2	NO	SB	A+	A-1	O-12 mths	O-12 mths		O-12 mths
	SB	AA-	F1+	aa-	SB	A1	2	NO	SB	A+	A-1	O-12 mths	O-12 mths		O-12 mths
	NO	AA-	F1+	aa-	NO	A1	2	NO	SB	A+	A-1	O-12 mths	O-12 mths		O-12 mths
	SB	A+	F1	a+	SB	A1	2	NO	SB	A	A-1	R-6 mths	R-6 mths		R-6 mths
SB	AA	F1+	aa	SB	A1	2	NO	NO	AA-	A-1+	O-12 mths	O-12 mths		O-12 mths	
SB	AA-	F1+	aa-	SB	Aa2	2	NO	SB	AA-	A-1+	O-12 mths	O-12 mths		O-12 mths	
Denmark Banks	SB	AAA			SB	Aaa		SB	AAA		10.85				
	SB	A	F1	a	SB	Aa3	5	P-1	SB	A	A-1	R-6 mths	R-6 mths		●
Finland Banks	SB	AA+			SB	Aa1		SB	AA+		10.86				
	WD	WD	WD		WD	Aa3	WD	P-1	SB	AA-	A-1+	O-12 mths	O-12 mths		O-12 mths

Counterparty	Fitch Ratings			Moody's Ratings			S&P Ratings			CDS Price	CDS Status	(CDS Adjusted with manual override)	
	Long Term	Short Term	Viability	Support	Long Term	Short Term	Long Term	Short Term	Suggested Duration				(Watch/ Outlook Adjusted)
France													
Banks	SB	AA			SB	Aa2		SB	AA		12.10		
BNP Paribas	SB	A+	F1	a+	SB	Aa3	5	P-1	SB	A	20.95	●	R-6 mths
Credit Agricole Corporate and Investment Bank	SB	A+	F1	WD	SB	A1	WD	P-1	PO	A	15.89	●	R-6 mths
Credit Agricole S.A.	SB	A+	F1	a+	SB	A1	5	P-1	PO	A	18.45	●	R-6 mths
Credit Industriel et Commercial	SB	A+	F1	a+	SB	Aa3	5	P-1	SB	A			R-6 mths
Societe Generale	SB	A	F1	a	SB	A2	5	P-1	SB	A	21.70	●	R-6 mths
Germany													
Banks	SB	AAA			SB	Aaa		SB	AAA		7.37		
BayernLB	SB	A-	F1	bbb	SB	Aa3	1	P-1	NR	NR			R-6 mths
Commerzbank AG	SB	BBB+	F2	bbb+	PO	A2	5	P-1	NO	A-	50.44	●	G-100 days
Deutsche Bank AG	SB	BBB+	F2	bbb+	SB	A3	5	P-2	NO	A-	67.35	●	G-100 days
DZ BANK AG Deutsche Zentral-Genossenschaftsbank	SB	AA-	F1+		WD	SB	Aa1	P-1	SB	AA-			O-12 mths
Landesbank Baden-Wuerttemberg	SB	A-	F1	bbb+	SB	Aa3	1	P-1	NR	NR			R-6 mths
Landesbank Berlin AG					SB	Aa2		P-1					O-12 mths
Landesbank Hessen-Thueringen Girozentrale	SB	A+	F1+		WD	SB	Aa3	P-1	SB	A	40.53	●	O-12 mths
Landwirtschaftliche Rentenbank	SB	AAA	F1+		SB	Aaa	1	P-1	SB	AAA			P-24 mths
Norddeutsche Landesbank Girozentrale	NO	A-	F1	bb	NO	Baa2	1	P-2	NR	NR			NIC-0 mths
NRW.BANK	SB	AAA	F1+		SB	Aa1	1	P-1	SB	AA-			P-24 mths
Netherlands													
Banks	SB	AAA			SB	Aaa		SB	AAA		10.36		
ABN AMRO Bank N.V.	SB	A+	F1	a	SB	A1	5	P-1	PO	A			R-6 mths
Bank Nederlandse Gemeenten N.V.	SB	AA+	F1+		SB	Aaa	1	P-1	SB	AAA			P-24 mths
Coöperatieve Rabobank U.A.	SB	AA-	F1+	a+	NO	Aa2	5	P-1	PO	A+	20.45	●	O-12 mths
ING Bank N.V.	SB	A+	F1	a+	SB	Aa3	5	P-1	SB	A+	16.21	●	O-12 mths
Nederlandse Waterschapsbank N.V.					SB	Aaa		P-1	SB	AAA			P-24 mths
Qatar													
Banks	NO	AA-			NO	Aa3		NO	AA-		102.57		
Qatar National Bank	NO	A+	F1	bbb+	NO	Aa3	1	P-1	NO	A	127.95	●	G-100 days

Counterparty	Fitch Ratings			Moody's Ratings			S&P Ratings			CDS Price	CDS Status	CDS Adjusted with manual override)
	Long Term	Short Term	Viability	Support	Long Term	Short Term	Long Term	Short Term	Suggested Duration			
Singapore												
Banks	SB AAA				SB Aaa			SB AAA				
DBS Bank Ltd.	SB AA-	F1+	aa-	1	SB Aa1	P-1	SB AA-	A-1+	O - 12 mths	O - 12 mths		O - 12 mths
Oversea-Chinese Banking Corp. Ltd.	SB AA-	F1+	aa-	1	SB Aa1	P-1	SB AA-	A-1+	O - 12 mths	O - 12 mths		O - 12 mths
United Overseas Bank Ltd.	SB AA-	F1+	aa-	1	SB Aa1	P-1	SB AA-	A-1+	O - 12 mths	O - 12 mths		O - 12 mths
Sweden											10.36	
Banks	SB AAA				SB Aaa			SB AAA				
Nordea Bank AB	SB AA-	F1+	aa-	5	SB Aa3	P-1	SB AA-	A-1+	O - 12 mths	O - 12 mths		O - 12 mths
Skandinaviska Enskilda Banken AB	SB AA-	F1+	aa-	5	SB Aa3	P-1	SB A+	A-1	O - 12 mths	O - 12 mths		O - 12 mths
Svenska Handelsbanken AB	SB AA	F1+	aa	5	SB Aa2	P-1	SB AA-	A-1+	O - 12 mths	O - 12 mths		O - 12 mths
Sveabank AB	SB AA-	F1+	aa-	5	SB Aa3	P-1	SB AA-	A-1+	O - 12 mths	O - 12 mths		O - 12 mths
Switzerland											19.00	
Banks	SB AAA				SB Aaa			SB AAA				
Credit Suisse AG	SB A	F1	a-	5	SB A1	P-1	SB A	A-1	R - 6 mths	R - 6 mths	46.72	R - 6 mths
UBS AG	SB AA-	F1+	a+	5	SB Aa3	P-1	SB A+	A-1	O - 12 mths	O - 12 mths	17.43	O - 12 mths
United Arab Emirates											61.29	
Banks	SB AA-	F1+	a-	1	SB Aa3	P-1	SB AA-	A-1+	O - 12 mths	O - 12 mths		O - 12 mths
First Abu Dhabi Bank PJSC	SB AA				SB Aa2			SB AA				
United Kingdom											15.94	
AAA rated and Government backed securities	NO AA				SB Aa2		NO AA					
Collateralised LA Deposit									Y - 60 mths	Y - 60 mths		Not Applicable
Debt Management Office									Y - 60 mths	Y - 60 mths		Not Applicable
Multilateral Development Banks									Y - 60 mths	Y - 60 mths		Not Applicable
Supranationals									Y - 60 mths	Y - 60 mths		Not Applicable
UK Gilts									Y - 60 mths	Y - 60 mths		Not Applicable
Banks												
Abbey National Treasury Services PLC	PW A	F1		1	SB Aa3	P-1			R - 6 mths	O - 12 mths		O - 12 mths
Bank of Scotland PLC	SB A+	F1	a	5	SB Aa3	P-1	PO A	A-1	R - 6 mths	O - 12 mths	38.41	O - 12 mths
Barclays Bank PLC	PW A	F1	a	5	NO A1	P-1	SB A	A-1	R - 6 mths	R - 6 mths	40.46	R - 6 mths
Close Brothers Ltd	SB A	F1	a	5	SB Aa3	P-1			R - 6 mths	R - 6 mths		R - 6 mths
Clydesdale Bank PLC	SB BBB+	F2	bbb+	5	PO Baa1	P-2	SB BBB+	A-2	NIC - 0 mths	NIC - 0 mths		NIC - 0 mths
Co-operative Bank PLC (The)	SB B-	B	b-	5	PO Caa2	NP			NIC - 0 mths	NIC - 0 mths		NIC - 0 mths

Counterparty	Long Term	Short Term	Viability	Support	Long Term	Short Term	Long Term	Short Term	Suggested Duration	(Watch/ Outlook Adjusted)	CDS Price	CDS Status	(CDS Adjusted with manual override)
Banks	SB	A			SB	A1	P-1	SB	A+	A-1	R - 6 mths	51.17	R - 6 mths
	SB	AA-	a+	1	NO	Aa3	P-1	SB	AA-	A-1+	O - 12 mths	18.43	O - 12 mths
	SB	A+	a	5	SB	Aa3	P-1	PO	A	A-1	R - 6 mths	31.50	O - 12 mths
	PW	A	a	2	SB	Aa3	P-1	SB	A	A-1	R - 6 mths		R - 6 mths
	SB	A+	a	5	SB	A1	P-1	SB	A	A-1	R - 6 mths	37.26	R - 6 mths
	SB	A		1	SB	A1	P-1	SB	A	A-1	R - 6 mths	50.19	R - 6 mths
	SB	AA-		1	SB	A1	P-1	SB	A+	A-1	O - 12 mths	17.43	O - 12 mths
	SB	A	a	5	SB	A2	P-1				R - 6 mths		R - 6 mths
	SB	A-	a-	5	SB	A3	P-2				G - 100 days		G - 100 days
	SB	A+	a	5	SB	Aa3	P-1	SB	A	A-1	R - 6 mths		R - 6 mths
						SB	Baa1	P-2			NIC - 0 mths		NIC - 0 mths
		SB	BBB+	bbb+	5	SB	Baa2	P-2			NIC - 0 mths		NIC - 0 mths
	Building Society	SB	A-	a-	5	SB	Baa1	P-2				G - 100 days	
					SB	B1	NP				NIC - 0 mths		NIC - 0 mths
SB		A-	a-	5	SB	A3	P-2				G - 100 days		G - 100 days
PW		BBB+	bbb+	5	PO	A2	P-1	PO	BBB+	A-2	B - 12 mths		Not Applicable
SB		BBB+	bbb+	5	SB	Baa3	P-3	SB	BBB-	A-3	B - 12 mths		Not Applicable
SB		BBB+	bbb+	5	NO	A2	P-1	SB	BBB+	A-2	B - 12 mths	46.69	Not Applicable
		SB	AAA			SB	Aaa					15.12	
SB		A+	a	5	SB	Aa3	P-1	SB	A+	A-1	O - 12 mths		O - 12 mths
SB		AA	aa-	5	SB	Aa1	P-1	SB	AA-	A-1+	P - 24 mths	40.16	P - 24 mths
SB		A+	a	5	PO	A1	P-1	SB	A+	A-1	R - 6 mths	39.69	O - 12 mths
Nationalised and Part Nationalised Banks	SB	AA-	a+	5	SB	Aa2	P-1	SB	A+	A-1	O - 12 mths		O - 12 mths
	SB	AA-	a+	5	SB	Aa1	P-1	NO	AA-	A-1+	O - 12 mths	40.23	O - 12 mths
United States													
Banks	SB	AAA			SB	Aaa						15.12	
	SB	A+	a	5	SB	Aa3	P-1	SB	A+	A-1	O - 12 mths		O - 12 mths
	SB	AA	aa-	5	SB	Aa1	P-1	SB	AA-	A-1+	P - 24 mths	40.16	P - 24 mths
Citibank N.A.	SB	A+	a	5	PO	A1	P-1	SB	A+	A-1	R - 6 mths	39.69	O - 12 mths
	SB	AA-	a+	5	SB	Aa2	P-1	SB	A+	A-1	O - 12 mths		O - 12 mths
JPMorgan Chase Bank N.A.	SB	AA-	a+	5	SB	Aa1	P-1	NO	AA-	A-1+	O - 12 mths	40.23	O - 12 mths
Wells Fargo Bank, NA	SB	AA-	a+	5	SB	Aa1	P-1	NO	AA-	A-1+	O - 12 mths	40.23	O - 12 mths

Key

Watches and Outlooks		CDS		Duration	
		Indicator	Status		
SB	Stable Outlook			60 Months	Y
NO	Negative Outlook	●	In Range	24 Months	P
NW	Negative Watch			12 Months	B
PO	Positive Outlook	●	Monitoring	12 Months	O
PW	Positive Watch	●	Out of Range	6 Months	R
EO	Evolving Outlook			100 Days	G
EW	Evolving Watch			0 Months	N/C
WD	Rating Withdrawn				

Appendix 2

List of OECD Members

Country	Date
AUSTRALIA	07 June 1971
AUSTRIA	29 September 1961
BELGIUM	13 September 1961
CANADA	10 April 1961
CHILE	07 May 2010
CZECH REPUBLIC	21 December 1995
DENMARK	30 May 1961
ESTONIA	09 December 2010
FINLAND	28 January 1969
FRANCE	07 August 1961
GERMANY	27 September 1961
GREECE	27 September 1961
HUNGARY	07 May 1996
ICELAND	05 June 1961
IRELAND	17 August 1961
ISRAEL	07 September 2010
ITALY	29 March 1962
JAPAN	28 April 1964
KOREA	12 December 1996
LATVIA	01 July 2016
LUXEMBOURG	07 December 1961
MEXICO	18 May 1994
NETHERLANDS	13 November 1961
NEW ZEALAND	29 May 1973
NORWAY	04 July 1961
POLAND	22 November 1996
PORTUGAL	04 August 1961
SLOVAK REPUBLIC	14 December 2000
SLOVENIA	21 July 2010
SPAIN	03 August 1961
SWEDEN	28 September 1961
SWITZERLAND	28 September 1961
TURKEY	02 August 1961
UNITED KINGDOM	02 May 1961
UNITED STATES	12 April 1961

Appendix 3

Treasury Management Criteria Summary

SPECIFIED INVESTMENTS: All such investments will be sterling denominated, with maturities up to the suggested duration as calculated by Link Asset Services from time to time.

NON-SPECIFIED INVESTMENTS: These are any investments which do not meet the Specified Investment criteria. For this Council these are qualifying investments with maturities exceeding one year. A maximum of £5m will be held in aggregate in non-specified investments.

Country Limits

UK: 100%

Non-UK: 20% (measured as at time of investment) **and** OECD membership countries **and** restricted to countries rated AAA with all three rating agencies.

Qualifying Counterparties

Counterparties appearing on the Link Asset Services list of qualifying counterparties from time to time, together with UK local authorities or supranationals.

Time and monetary limits applying to investments

The time and monetary limits for institutions on the Council's counterparty list are as follows (these will cover both Specified and Non-Specified Investments):

	Existing Limit	Proposed Limit	Max. maturity period	Sector Rating
Cash deposits with DMO at the Bank of England	No limit	No limit	Liquid	N/A
Cash or Term deposits with Local authorities	£5m	£5m	3 years	N/A
Cash or Term deposits with UK Nationalised and Part Nationalised Banks	£5m	£5m	On call	C
	£5m	£5m	Up to 1 year	C
	£1m	£1m	Up to 3 years	C
Cash or Term deposits with banks and building societies (per CAPITA list as updated from time to time)	£5m	£5m	On call	C
	£5m	£5m	Up to 3 months	C
	£5m	£5m	Over 3 months up to 1 year	C
	£1m	£1m	Over 1 year up to 2 years	C
	£1m	£1m	Over 2 years up to 3 years	C

Key:

There are no proposed changes from prior year.

C CDS adjusted with manual override column of Link Asset Services credit rating list (Appendix 1)

Other

The local authority limit applies to the entire Local Authority sector.

A group of banks under the same ownership will be treated as a single organisation for limit purposes.

Appendix 4

Example of investment list using the list in appendix 1 and the criteria in appendix 3

SUMMARY OF INVESTMENTS - 29.12.17					
BORROWER	LIMIT	START DATE	END DATE	INT RATE	INV VALUE
	£				£
Deposits with DMO (0 - 60mths)	Unlimited	15/12/2017	08/01/2018	0.250%	2,500,000
		28/12/2017	05/01/2018	0.100%	725,000
DMO Total					3,225,000
					0
Deposits with Other Local Authorities (up to 3 years)	5,000,000				
					0
Deposits with UK nationalised & part nationalised (up to 12mths)	5,000,000				
Royal Bank of Scotland (0 - 12mths)		30/01/2017	29/01/2018	0.560%	5,000,000
UK nationalised & part nationalised banks Total					5,000,000
UK Banks and Building Societies	5,000,000				
Lloyds Banking Group (0 - 6mths)		15/11/2017	05/03/2018	0.500%	5,000,000
Barclays Bank PLC (0 - 6mths)					0
Nationwide B S (0 - 6mths)		01/12/2017	19/03/2018	0.400%	4,000,000
		15/11/2017	19/02/2018	0.370%	1,000,000
Nationwide Total					5,000,000
Coventry B S (0 - 6mths)		06/12/2017	02/01/2018	0.300%	3,000,000
		14/09/2017	22/01/2018	0.230%	2,000,000
Coventry Total					5,000,000
HSBC Bank PLC (0 - 12mths)		various	CALL	0.350%	4,950,000
Santander UK plc (0 - 6mths)		95 day notice	15/04/2018	0.400%	5,000,000
UK Banks & Building Societies Total					24,950,000
Non UK, Non Eurozone Banks (No more than 20% measured at the time of investment)	5,000,000				
Handelsbanken (0 - 12mths)		various	CALL	0.150%	0
					0
Overall Total			TOTAL		33,175,000

The institutions available for investment and actual period limits will be determined by Link Asset Services's credit rating list issued from time to time (see Appendix 1), and using the monetary limits set by Council (see Appendix 3).

Appendix 5

Four Clauses adopted from CIPFA's Treasury Management Code of Practice

The Council has adopted the key principles of CIPFA's *2017 Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance* (the Code), as described in Section 5 of that Code.

- 1 This organisation 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 organisation 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 Sections 6 and 7 of the Code, subject only to amendment where necessary to reflect the particular circumstances of this organisation. Such amendments will not result in the organisation materially deviating from the Code's key principles.

- 2 This organisation (ie full board/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.
 - 3 This organisation delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices to [note 1], and for the execution and administration of treasury management decisions to [note 2], who will act in accordance with the organisation's policy statement and TMPs and, if he/she is a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management.
 - 4 This organisation nominates the Audit Committee to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.
-