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# Treasury Policy 2024/25

Decision to be taken by: Council

Date of meeting: 21 February 2024

Lead director: Amy Oliver, Director of Finance

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## Useful information

- Ward(s) affected: All.
- Report author: Nick Booth
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- Report version number: 1

## 1 Summary

- 1.1 This report gives a framework for the governance of the Council's borrowing and investments, and it updates the framework previously approved by Council.
- 1.2 Treasury management is the process that ensures the Council always has enough cash to make the payments that are necessary for its operations, and this involves both borrowing and investment.
- 1.3 The Treasury Policy is a framework document stating how the activity is governed. It is supported by an annual strategy (the strategy for 2024 is elsewhere on your agenda).

## 2. Recommendations

- 2.1 The Overview Select Committee is recommended to note the report and make comments to the Director of Finance and the Executive as they wish.
- 2.2 The Council is recommended to approve the Treasury Policy at Appendix 1.

## 3. Scrutiny / stakeholder engagement

- 3.1 The Treasury Policy will go to Overview Select Committee prior to being presented to Council for approval.

## 4. Overview of Treasury Management

- 4.1 There are two main elements of treasury management.
- 4.2 The first element is **borrowing money** to finance capital expenditure. Most capital spending is now funded by capital grant, but we still have historic borrowing dating back many years (when the Government chose to use borrowing approvals to support capital).
- 4.3 The revenue budget approved by the Council each year includes provision for the interest payable on this borrowing. It also includes a provision for repaying the borrowing over a number of years (broadly speaking, over the economic life of the assets acquired).
- 4.4 The Housing Revenue Account operates under separate rules (though within the same legal regime) whereby interest has to be accounted for but the principal does not have to be repaid through the application of Minimum Revenue Provision (MRP) from the revenue account. Our general approach is that for the HRA we will not repay principal for historic debt, but we will do so for new borrowing. New borrowing for the HRA will also be allowed for when a new income stream is created such as acquisitions of rental properties or new build but will not be used for general maintenance.

- 4.5 The second element is **cash management** which involves managing the Council's investments to ensure the optimum amount of money is held in our bank account on a day-to-day basis – so that there is enough money to cover payments made on the day, but no more. Excess cash on the day will generally be placed in money market funds to enable a higher interest rate to be obtained.
- 4.6 The Council has substantial investments, but this is not “spare cash”. Whilst there are links to the budget process, these sums do not form part of the budget. To the extent that the Council has money it can spend, this is reflected in the budget report.
- 4.7 There is a provision for interest earned on investments in the Council's revenue budget.
- 4.8 Treasury activities are governed by the Treasury Policy which this report updates. The policy specifies how borrowing and investments should be organised, the responsibilities of officers, and the limits placed on officers' discretion to act without further approval. It should be noted that as decisions on borrowing individual sums have to be taken very quickly, this is delegated to officers within a framework specified by this policy. Treasury operations are subject to retrospective member scrutiny. The proposed policy is shown at the appendix to this report.
- 4.9 An annual Treasury Management Strategy specifies how borrowing and investment will be carried out.
- 4.10 A twice-yearly report is submitted to Overview Select Committee reviewing the treasury activity undertaken in the year.
- 4.11 The Treasury Policy comprises a Treasury Management Policy Statement (TMPS) and 12 “Treasury Management Practices” (“TMPs”).
- 4.12 The TMPS defines the overall objectives of the treasury management function and emphasises the pursuit of optimum performance and the effective control of risk. The 12 TMPs expand upon this and, together with supporting schedules (prepared by the Director of Finance), establish a comprehensive framework for the management and control of borrowing, investment and other treasury functions.
- 4.13 This report is solely concerned with treasury transactions. In addition to these the Council may also build or acquire buildings or other real estate from which it earns income, and it may make loans to local organisations or businesses for economic and social reasons. These other activities are governed by the Capital Strategy and Investment Strategy, both of which are elsewhere on your agenda.
- 4.14 It should be noted that borrowing by local authorities is severely restricted by central government if they spend or plan to spend resources on assets that are “primarily for yield”. The Council does not invest “primarily for yield” though this rule does not restrict capital expenditure on services or regeneration.

## **5. Financial, legal, equalities, climate emergency and other implications**

### **5.1 Financial Implications**

This report is solely concerned with financial issues.

## 5.2 Legal Implications

The Council is required as a matter of law to pay due regard to CIPFA's Code of Practice on Treasury Management and statutory guidance issued by DLUHC. Other than this, no specific legal issues are raised by this report.

Kevin Carter Ext 37 4197

## 5.3 Equalities Implications

There are no direct equalities implications arising from the report.

Equalities Officer, Surinder Singh, Ext 37 4148

## 5.4 Climate Emergency implications

Finance and investment can have significant climate-related impacts, depending on where funds are held and how they are used. As such, the Council should consider opportunities to ensure that its' investments are not contributing to negative climate and environmental impacts, as relevant and appropriate. Opportunities for investments that provide positive benefits should also be considered, including within the Council's corporate estate portfolio, with businesses responsible for around a third of the city's carbon footprint. Consideration should therefore be given to opportunities to improve the energy efficiency and reduce the carbon emissions of these properties, which could potentially also reduce energy costs and improve their overall condition and value.

Aidan Davis, Sustainability Officer, Ext 37 2284

## 6.5 Other implications (You will need to have considered other implications in preparing this report. Please indicate which ones apply?)

n/a.

## 6. **Background information and other papers:**

6.1 The Council's Treasury Policy - "Treasury Policy" (Council 20th February 2020).

## 7. **Summary of appendices:**

Appendix 1 – Treasury Policy

## 8. **Is this a private report (If so, please indicate the reasons and state why it is not in the public interest to be dealt with publicly)?**

No

## 9. **Is this a "key decision"? If so, why?**

**TREASURY POLICY**

**1. Treasury Management Policy Statement (TMPS)**

- 1.1 The overall aim of the Council's treasury activity is to minimise the Council's net financing costs, whilst maintaining an appropriate level of liquidity and taking a prudent approach to risk.
- 1.2 The Council defines the policies and objectives of its treasury management activities as follows:-
- “The management of the authority's 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”.
- 1.3 The Council regards the successful management of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured.
- 1.4 This Council is committed to the principles of achieving value for money in treasury management, and to employing suitable performance measurement techniques.
- 1.5 The Council will create and maintain, a Treasury Policy (i.e. this document). This will be supported by suitable Treasury Management Practices (TMPs, shown below), setting out the manner in which the Council will seek to achieve these policies and objectives, and prescribing how the Council will manage and control those activities.
- 1.6 The Council will receive reports on an annual strategy in advance of each year, and the Overview Select Committee (OSC) will receive twice yearly reports on performance.
- 1.7 The Council delegates responsibility for the execution and administration of treasury management decisions to the Director of Finance (DoF) who will act in accordance with this policy statement and TMPs; and CIPFA's Standard of Professional Practice on Treasury Management. Monitoring of the function will be undertaken by the OSC.
- 1.8 In practice the following matters are delegated to the DoF:
- Decisions on borrowing, investments, leasing and other forms of finance;
  - Renegotiation and premature repayment of loans;
  - Entering into associated contracts;
  - Selection of treasury advisors;
  - Selection of the money market brokers;
  - Selection of leasing brokers used, if any;
  - Selection of counterparties required for treasury purposes;
  - The allocation of responsibilities and organisation of staffing;
  - Determining the procedures to be followed by staff involved in treasury management, including internal controls and safeguards;
  - Determining the accounting treatment of treasury decisions;
  - Determining a list of institutions from whom the Council may borrow money;

- Negotiating the terms of loan agreements and other capital finance arrangement (as specified in TMP 4);
- The preparation of schedules to TMPs, to serve as working documents for day-to-day use;
- Determining the list of institutions (the “lending list”) to whom the Council will lend or invest, and for what period, applying the criteria established by the Council’s Treasury Management Strategy.

## 2. **Treasury Management Practices**

2.1 As part of the Treasury Policy, the Council is asked to approve 12 Treasury Management Practices.

TMP1	- Risk Management
TMP2	- Best Value and performance measurement
TMP3	- Decision making and analysis
TMP4	- Approved instruments, methods and techniques
TMP5	- Organisation, clarity and segregation of responsibilities and reporting arrangements
TMP6	- Reporting arrangements and management information arrangements
TMP7	- Budgeting accounting and audit arrangements
TMP8	- Cashflow management
TMP9	- Money laundering
TMP10	- Staff training and qualifications
TMP11	- Use of external service providers
TMP12	- Corporate Governance

## 3. **TMP1 – Risk Management**

- 3.1 The DoF will have paramount regard to the risk associated with treasury management decisions and will ensure systems exist to control this risk.
- 3.2 The DoF will make sure we have enough money available immediately to meet day-to-day obligations.
- 3.3 Borrowing and investment strategy will be undertaken with regard to the implications for the Council’s budget, whilst not missing opportunities to save money over the longer term.
- 3.4 The DoF will keep a list of the people the Council will invest with (mainly by lending money), and limits for each. These “counterparty lists” will reflect a prudent attitude towards organisations with whom funds may be deposited. The counterparty policy will be established within the annual treasury strategy.
- 3.5 The DoF will ensure the Council complies with legal requirements. We will demonstrate such compliance, if required to do so, to all parties with whom the Council deals. In framing the counterparty policy, the DoF will ensure that there is evidence of counterparties’ powers, authority and compliance with regulatory requirements.
- 3.6 The DoF will use systems to prevent the risk of fraud or loss and will maintain contingency management arrangements.

- 3.7 The DoF will look to mitigate any losses to the Council if interest rates move the wrong way.
- 3.8 The DoF will make sure we don't have to borrow too much all at once, and will refinance maturing loans and other financing arrangements as necessary.
- 3.9 The DoF will manage exposure to exchange rate risk, inflation risk and price risk.
- 3.10 Members are asked to note that the avoidance of all risk is neither appropriate nor possible and a prudent balance will need to be struck between avoiding risk and maximising returns.

#### 4. **TMP2 – Performance Measurement**

- 4.1 The Council will continually monitor treasury management performance.
- 4.2 We will evaluate borrowing and investment decisions by reference to external data, which may include:-
  - i) Benchmarks derived from financial market data;
  - ii) Benchmarks provided by the Council's treasury advisors.
- 4.3 The DoF will obtain a comprehensive annual review of the Council's treasury position, prepared by independent treasury advisors.
- 4.4 The main vehicle for such reviews to be reported to elected members are the six-monthly reviews of treasury management activities reported to OSC.

#### 5. **TMP3 – Decision-making and analysis**

- 5.1 The DoF will maintain full records of treasury management decisions, and of the processes and practices applied in reaching those decisions.

#### 6. **TMP4 – Approved instruments, methods and techniques**

- 6.1 The Council may raise new loans or other capital finance. It may also repay existing borrowing instruments or transfer these to third parties. It may use borrowing instruments from the approved list below.

##### **Loans**

- 1. Public Works Loans Board Loans
- 2. Municipal Bond Agency Loans
- 3. UK Infrastructure Bank
- 4. Loans from other local authorities
- 5. European Investment Bank Loans
- 6. Commercial Bank Loans
- 7. Stock Issues
- 8. Market Loans
- 9. Local Temporary Loans
- 10. Local Bonds
- 11. Negotiable Bonds
- 12. Commercial Paper
- 13. Medium Term Notes

## 14 Bank Overdraft

### **Other Capital Finance**

1. Operational Leases
2. Finance Leases
3. Sale and lease back
4. Construction and lease back / income strips

- 6.3 Borrowing instruments are permitted to be contracted for in advance - for example to lock into cheap interest rates. Where they are complex our decisions will be informed by independent, expert advice.
- 6.4 The DoF may determine that other instruments can be used when, in substance, they are similar to those already authorised.
- 6.5 Permitted **investment instruments** will be specified in the annual Treasury Investment Strategy.
- 6.6 The Council is classified as a “professional investor” for the purposes of the regulatory framework of “MIFID II”. This means that it has access to a wider range of investments than “retail investors”.

### **7. TMP5 – Organisation, clarity and segregation of responsibilities, and dealing arrangements**

- 7.1 The DoF will make sure the duties of staff are properly organised and written down.
- 7.2 The principle on which this will be based is a clear distinction between those charged with setting treasury and management policies, and those charged with implementing and controlling these policies, particularly with regard to the execution and transmission of funds.
- 7.3 If the DoF intends to depart from these principles (for example due to staff sickness) additional monitoring and reporting arrangements will be put in place.
- 7.4 The DoF will ensure that there are clear written and communicated statements of the responsibilities of each role, and the arrangements for absence cover. Delegation arrangements will also be documented.
- 7.5 The DoF will ensure there is proper documentation for all deals and transactions, and that procedures exist for the effective transmission of funds.

### **8. TMP6 – Reporting requirements and management information arrangements**

- 8.1 Regular reports will be taken to members. As a minimum, the following reports will be prepared:-
- i) An annual report to the City Mayor and Council on the strategy to be pursued in the coming year;
  - ii) A twice annual report to OSC on the performance of the treasury management function, on the effects of the decisions taken in the past year, and on any circumstances of non-compliance with the organisation’s treasury management policy or strategy.



9. **TMP7 – Budgeting, accounting and audit arrangements**

9.1 The costs of treasury management will be reflected in the Council's normal budgeting arrangements.

10. **TMP8 – Cash Management**

10.1 The DoF will manage the Council's cash holdings in their entirety. Cash flow projections will be prepared regularly and the DoF will ensure that these are adequate to ensure that the Council always has sufficient funds to meet its obligations.

11. **TMP9 – Money Laundering**

11.1 The Council may become the subject of an attempt to involve it in the laundering of money. The DoF will maintain procedures for verifying and recording the identity of counterparties and reporting suspicions, and will ensure that staff are properly trained.

11.2 A policy to prevent the Council's unwitting involvement in money laundering has been established.

12. **TMP 10 – Staff training and qualifications**

12.1 The DoF will use properly trained staff.

12.2 The core professional requirement for senior staff leading the treasury function is a professional accountancy qualification. Officers dealing with treasury and cash management will receive ongoing training and development on specific matters which will be provided by an appropriate blend of direct study of briefing notes etc; and organised courses, conferences and seminars.

12.3 Elected members will be offered training and development.

13. **TMP11 – Use of external service providers**

13.1 The Council will use external experts, where this is sensible. When external experts are used, the DoF remains responsible for the treasury management function.

14. **TMP12 – Corporate Governance**

14.1 Treasury management activity will comply with our usual corporate governance principles. Accordingly, the treasury management function and its activities will be undertaken with openness and transparency, honesty, integrity and accountability.

14.2 The Council places high value on the use of independent treasury advisors. It looks to such advisors to present an independent view of the Council's treasury investments and borrowings.