

Report to Audit Committee

7 December 2022

By the Director of Resources

DECISION REQUIRED

Not exempt



Capital Strategy 2023/24 incorporating Investment and Treasury Management Strategy

Executive Summary

This report combines an overview of how capital expenditure, capital financing, treasury and other investment activity contribute to the provision of local public services, how the associated risks are managed and the implications for future financial sustainability.

The strategies set limits and indicators that embody the risk appetite that the Council believes to be prudent. The strategies are set against the Council's own mid-term financial strategy, the context of the UK economy and projected interest rates.

The report reflects revisions made by CIPFA to its Treasury Management and Prudential Codes last year. These have introduced new indicators and requirements designed to deal with risks perceived in the local authority sector.

The report sets treasury investment criteria and limits which are largely unchanged in real terms. A number of limits are increased in line with inflation as they have remained unchanged for some years. Limits for sovereign and secured bonds have been extended reflecting an assessment of the risk they are exposed to. The interest rate sensitivity indicator is increased from £250,000 to £300,000 reflecting higher cash balances.

The investment strategy in paragraphs 4.11 to 4.18 and appendix C pulls together information on service loans and commercial property to demonstrate the Council's risk management approach in that area. The overall strategy is unchanged apart from an increase in the service loans to accommodate expected activity by the Council's Housing Company. The commercial property portfolio was largely recovering from any pandemic effects but risks to income persist especially in the retail part of the portfolio due to the present recession.

Recommendations

The Committee is asked to:

- i) approve this Capital Strategy as an appropriate overarching strategy for the Council while leaving the full Council to approve the updated Capital Strategy that will accompany the 2023/24 budget to Council.

- ii) recommend that the full Council approve the Treasury Management Strategy for 2023/24 and the associated limits and specific indicators included in section 4 and appendix B of this report.
- iii) recommend that the full Council approve the Investment Strategy for 2023/24 and the associated limits and specific indicators included in section 4 and appendix C of this report.

Reasons for Recommendations

- i) The Council is required to have regard to the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice and Prudential Code for Capital Finance that require the Council to approve a Capital Strategy, Investment Strategy and Treasury Management Strategy before the start of each financial year.
- ii) The Department for Levelling Up, Housing and Communities (DLUHC) issued revised guidance on local authority investments in 2018 that the Council is required to have regard to.

Background Paper

"Update on the Council's financial position 2022/23" – Cabinet 24 November 2022

Consultation: Arlingclose Limited

Wards affected: All

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Background Information

1 Introduction

The purpose of this report

- 1.1 This report covers the requirements of CIPFA Codes and guidance that the Council must, by statute, have regard to. Section 3 gives an overview of:
 - how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services
 - how associated risk is managed and;
 - the implications for future financial sustainability.
- 1.2 The Treasury Management Strategy in section 4 covers the aspects of investments that this Committee has historically considered. It covers management of the Council's cash flows, borrowing and investments, and the associated risks.
- 1.3 The Investment Strategy starting in paragraph 4.11 covers investments held for service purposes or for commercial yield.
- 1.4 The guidance requires the Capital and Investment Strategies to be approved by the full Council while the Treasury Management Strategy can now be approved by a subcommittee of the Council. However, here we follow the Council's own practice that this Committee recommends the Treasury Management Strategy be approved by the full Council.

2 Background

Economic background

- 2.1 The Council's strategies must take account of expectations for the economy and specifically the finance sector. The Council receives advice on this from its advisors Arlingclose Ltd. Appendix A is a commentary by them on the current economic background, the outlook for creditworthiness and interest rates.
- 2.2 For the purpose of the interest budget, any new investments are estimated to be on or about the Bank Rate.
- 2.3 The treasury management environment has changed radically since last year. The very low yields that seemed to be the new normal have been replaced by rising rates and rate volatility. Although this has brought challenges of interpreting how rates would develop, the rising rates have significantly increased the Council's investment income.

Statutory background

- 2.4 This report is part of the Council's legal obligation under the Local Government Act 2003 to have regard to both the CIPFA Codes and the Department For Levelling Up, Housing and Communities Guidance. Treasury risk management at the Authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2021 Edition (the CIPFA Code) which requires the Authority to approve a treasury management strategy before the start of each financial year.
- 2.5 The regulatory background has been complicated by the revision of both CIPFA Codes and Department for Levelling Up, Housing and Communities guidance. Both CIPFA and the Department For Levelling Up, Housing And Communities do not seek to prescribe precisely how councils invest but they clearly have concerns that some councils are taking increasing commercial risks using borrowed money. This approach means that Members are asked to look at a more extensive strategy so that more of the risks that the Codes and guidance highlight are apparent to Members.

Relevant Council policy

- 2.6 The Council's constitution requires that the Council approve Prudential Code indicators and Treasury Management Strategy. The Investment Strategy covering commercial property has been split from the traditional Treasury Management Strategy here for ease of understanding as it deals with a different type of investment, but it can be considered to be encompassed in the definition of the Treasury Management Strategy as used by the Constitution.
- 2.7 The existing strategies and Prudential indicators were approved by the Council in February 2022; having been recommended for adoption by this Committee on 1 December 2021.

3 Capital Expenditure and Financing

- 3.1 Capital expenditure is where the Council spends money on assets, such as property or vehicles that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. All capital expenditure must be financed, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves and capital receipts) or debt (borrowing or leasing).
- 3.2 Service managers bid annually in October to include projects in the Council's capital programme. Bids are collated by Finance who calculate the financing cost (which can be nil if the project is fully externally financed). The Senior Leadership Team appraises all bids based on a comparison of service priorities against financing costs and makes recommendations to the informal cabinet. The final capital programme is then presented to Cabinet in January and to Council in February each year.
- 3.3 The current projected capital programme and financing is shown below. It includes current estimates for capital bids for 2023/24 and beyond. It will be

revised, if necessary, as the 2023/24 budget process develops and the final figures that appear alongside the Budget in February 2023 will constitute one of the prudential indicators required by the CIPFA Prudential Code.

£millions	2021/22 Actual £000	2022/23 Estimate £000	2023/24 Estimate £000	2024/25 Estimate £000	2025/26 Estimate £000
Services Capital Spend	4.6	5.5	6.7	8.3	14.1
Capital Investments	0.1	0.6	1.6	1.5	0
Financed by:					
External resources	2.0	2.4	2.0	7.4	6.6
Internal Resources *	1.4	3.7	6.3	2.4	7.5
Debt	1.3	0.0	0.0	0.0	0.0
Total Financing	4.7	6.1	8.3	9.8	14.1

* Includes use of New Homes Bonus

- 3.4 From this year, following a revision to the CIPFA code, capital spend is broken down into spend which directly provides services and spend on capital investments, which covers equity and loans provided to the Council's Housing companies or necessary improvements to existing investment properties.
- 3.5 The term 'Debt' used above does not automatically lead to external borrowing as the Council may be able to use cash it holds in reserves and as working capital which is usually termed 'internal borrowing'.
- 3.6 Over time, all debt, whether it be internal or external borrowing, must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as minimum revenue provision (MRP). The Council is required to make an annual MRP statement and this will be included in the Budget report in January 2023 and the methodology will be on the same basis as 2022/23. The current planned MRP payments are as follows:

£millions	2021/22 actual	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget
MRP	0.9	0.9	0.9	0.9	0.9

- 3.7 The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and any capital receipts used to replace debt. The CFR is gradually decreasing as MRP is paid and no new unfinanced spend is planned. The decrease is less in 2023/24 due to the change in lease accounting. The Council's estimated CFR is projected as follows:

£millions	31.3.2022 actual	31.3.2023 forecast	31.3.2024 budget	31.3.2025 budget	31.3.2026 budget
CFR	33.6	32.7	31.8	30.9	30.0

- 3.8 **Asset disposals:** When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets. Repayments of capital grants, loans and investments also generate capital receipts. Loans repaid below are estimates of those from the Council's Housing Company. The Council projects capital receipts as follows:

£millions	2021/22 actual	2022/23 forecast	2023/24 estimate	2024/25 estimate	2025/26 estimate
Asset sales	1.3	0.4	0.5	1.3	2.3
Loans repaid	0.0	0.0	0.4	1.6	1.6
TOTAL	1.3	0.4	0.9	2.9	3.9

4 Treasury Management

4.1 Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

4.2 **Borrowing strategy:** The Council has no plans to borrow but could find itself in a position which calls for borrowing. In that circumstance, the main objectives when borrowing would be to achieve a low but certain cost of finance while retaining flexibility. These objectives are often conflicting, and the Council therefore would seek to strike a balance between short-term loans (currently available at about 3%) and long-term fixed rate loans where the future cost is known but usually higher (currently about 4%).

4.3 Projected levels of the Council's total outstanding debt are shown below, compared with the Capital Financing Requirement. Statutory guidance is that debt should remain below the Capital Financing Requirement, except in the short-term. As can be seen from the table the Council expects to comply with this in the medium term.

£millions	31.3.2021 actual	31.3.2022 forecast	31.3.2023 budget	31.3.2024 budget	31.3.2025 budget
Debt	0	0	0	0	0
CFR	33.6	32.7	31.8	30.9	30.0

4.4 The table above demonstrates that the Council is relying on internal borrowing i.e. using reserves and other cash resources that it holds rather than borrowing from external sources. From projections of the capital programme and use of reserves this strategy is seen as sustainable in the medium term although the Director of Resources will monitor the actual position against the projections in order to be ready to respond should external borrowing become advisable.

4.5 **Liability benchmark:** This is a new indicator in the CIPFA Prudential Code designed to compare an Authority's actual borrowing against a benchmark showing the lowest risk level of borrowing. The Council has no current or forecast need to borrow and therefore has a liability benchmark of zero. The table in paragraph 4.8 below shows a projection of investments based on long-term cash

flow forecasts and this acts as a general envelope for the long term treasury management strategy.

- 4.6 **Affordable borrowing limit:** Irrespective of plans to borrow or not the Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit. Although no borrowing is planned, limits are set in case a need develops. Further details on borrowing are in appendix B.

£millions	2022/23 limit	2023/24 limit	2024/25 limit	2025/26 limit
Authorised limit – borrowing	15	15	15	15
Authorised limit – leases	6	6	6	6
Authorised limit – total external debt	21	21	21	21
Operational boundary – borrowing	0	0	0	0
Operational boundary – leases	0	0	0	0
Operational boundary – total external debt	0	0	0	0

- 4.7 **Treasury Investment strategy:** Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management and will be dealt with in the Investment Strategy in paragraph 4.11 onwards and Appendix C.

- 4.8 The Council's policy on treasury investments is to prioritise security and liquidity over yield that is to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy, and the Council may request its money back at short notice. The future longer-term investments in the table below are strategic pooled funds that the Council intends to hold for the longer term, although they can be sold if required.

	31.3.2022 actual	31.3.2023 forecast	31.3.2024 estimate	31.3.2025 estimate	31.3.2026 estimate
Near-term investments	57	41	37	33	27
Longer-term investments	26	32	32	32	32
TOTAL	83	73	69	65	59

- 4.9 The projections show cash balances at year-end, which is a cash low point, in the region of £60m in the medium term. The Capital programme no longer features major projects while developers' contributions tend to flow in faster than they are spent. Further detail on treasury investments are in Appendix B including limits and indicators which the Committee is asked to consider. The

significant changes compared to last year's limits are an increase on sum limits to reflect the real value of money, increases on time limits for investments in certain secure investments, and a change to the interest rate exposure indicator.

- 4.10 **Governance:** Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Director of Resources and staff, who must act in line with the Treasury Management Strategy as approved by the Council following this committee's scrutiny and recommendation. The Audit Committee currently receives a mid-year and full year report and is responsible for scrutinising treasury management decisions. The revised CIPFA code recommends a quarterly report, which will commence in the new financial year.

Investment Strategy (loans, shares and property)

- 4.11 This section is the disclosure required by CIPFA and the Department for Levelling Up, Housing and Communities guidance, which has been tightened in recent years as concerns over the perceived increasing risks in Local Authority sector as councils have become more commercial and made large commercial property purchases.

Investments for Service Purposes

- 4.12 The Council has the ability to make investments to assist local public services, including making loans to local service providers and buying shares and making loans to any Council subsidiaries that provide services. In light of the public service objective, the Council is willing to take more risk than with treasury investments. However, it still plans for such investments to generate a profit after all costs to offset risk. Further details on service investments are in appendix C. The overall limits are increased by £1m to £4m on the total exposure to loans for service purposes. The £0.5m exposure permitted for shares is unchanged.
- 4.13 **Governance:** Decisions on service investments are made by the full Council after the relevant Head of Service has submitted a comprehensive analysis in consultation with the Director of Resources and must meet the criteria and limits. Most loans and shares are capital expenditure and will therefore also be approved as part of the capital programme in the Budget report or by full Council.

Commercial Activities

- 4.14 With central government financial support for local public services declining, the Council invests in commercial property within the district purely or mainly for financial gain. Total commercial investments were valued at £60m on 31 March 2022. These provide a net return after direct costs of just under 6% based on the last set of final accounts which value the assets at market value rather than historical value.
- 4.15 As financial return is the main objective, the Council recognises the higher risk on commercial investment compared with treasury investments. The principal risk exposures include individual voids, falls in market value, and changes in economic activity. Individual property risks are constantly monitored and managed by the Head of Property and Facilities. Should income not meet expectations the Council holds at least £6m of general reserves available to

balance the revenue budget in the short term while the Head of Property and Facilities reviews the performance of the portfolio.

- 4.16 In order that commercial investments remain proportionate to the financial capacity of the Council, these are subject to an overall maximum investment limit which is set at £70m.
- 4.17 **Governance:** Decisions on new commercial investments are made by the Cabinet after consideration by the Policy Development Advisory Group for Finance and Parking in line with the criteria and limits approved by the Council in this strategy. Property and most other commercial investments are also capital expenditure and purchases will therefore also be approved as part of the capital programme. Further details on commercial investments and associated limits and benchmarks are in appendix C.
- 4.18 **Net income from commercial and service investments to net revenue stream:** the latest iteration of the Code requires the reporting of a prudential indicator that shows the proportion that commercial and service net income forms of the whole Council's net revenue stream.

	2021/22 actual	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget
Total net income from service and commercial investments	£3.5m	£3.7m	£3.7m	£3.8m	£3.9m
Proportion of net revenue stream	28%	28%	28%	28%	28%

Other Liabilities

- 4.19 The Council has set aside £1.6m to cover risks of Business Rates Appeals. The Council is also at risk of having to pay for historic insurance claims but has not put aside any money because there is no reasonable assessment of the amount required.
- 4.20 **Governance:** Decisions on incurring new discretionary liabilities are taken by the relevant director in consultation with the Director of Resources. If significant, these would be discussed at the quarterly corporate risk management meeting and final decisions as to recognition taken by the Director of Resources. New liabilities exceeding £1m are reported to full Council for approval or notification as appropriate. Further details on liabilities are in note 18 of the 2021/22 statement of accounts.

Revenue Budget Implications

- 4.21 Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue. This annual charge is known as financing costs. This is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants

to produce a required prudential indicator. As the Council does not borrow the financing costs are purely the MRP which is stable as no new unfinanced spend is envisaged.

	2021/22 actual	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget
Financing costs (£m)	0.9	0.9	0.9	0.9	0.9
Proportion of net revenue stream	7%	7%	7%	7%	7%

- 4.22 **Sustainability:** Due to the long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 40 years into the future. The Director of Resources is satisfied that the proposed capital programme is prudent, affordable and sustainable because the net budget demand on the Council and the risks in the programme have been reviewed and fall within the Council's tolerances.

Knowledge and Skills

- 4.23 The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. For example, the Director of Resources and S151 Officer is a qualified accountant with over 20 years' finance experience and the Head of Property and Facilities is a fellow of RICS with over 35 years' experience in commercial property. The Council continues to support junior staff to study towards relevant professional qualifications.
- 4.24 Where Council staff do not have the knowledge and skills required, use is made of external advisers that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers and for any significant property investment would use property consultants with specialist knowledge of the appropriate property sector. This approach ensures access to right knowledge and skills and can be more cost effective than employing such staff directly. The overarching requirement is that the Council has access to knowledge and skills commensurate with its risk appetite.

5 Outcome of Consultations

- 5.1 Externally the Council's adviser Arlingclose was consulted. Internally the Head of Property and Facilities was consulted.

6 Other courses of action considered but rejected

- 6.1 The Department for Levelling Up, Housing and Communities' Investment Guidance and the CIPFA Codes of Practice do not prescribe any particular strategies for local authorities to adopt. The above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below:

Alternative	Impact on income and expenditure	Impact on risk management
Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses will be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses will be smaller
Borrow additional sums at long-term fixed interest rates using less internal funds	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Invest more in service loans	Interest income will be higher and service benefits will accrue	Increased risk of losses from credit related defaults or service body being unable to pay loan and provide service
Reduce investment in property	Income will be lower	Lower chance of losses from non-paying tenants or falling property values.
Invest additional sums in property	Income will be higher	Increased chance of losses from vacancies or falling property values. Reputational and regulatory risk if Council incurs large loss

7 Resource consequences

- 7.1 The budgeted treasury investment income in 2023/24 is £2.4m (2022/23 £0.97m), which is equivalent to an average investment portfolio of £71m at an interest rate of 3.4%. The increase is due to the general increase in the rates available. There is no budget for debt interest as no borrowing, even on a short-term basis, is envisaged. The budget for commercial property net income is £3.7m which is a yield of 6.3% from an investment portfolio of £59m.
- 7.2 There are no staffing consequences apart from the need for appropriate training.

8 Legal Considerations and Implications

- 8.1 This report is part of the Council's legal obligation under the Local Government Act 2003 to have regard to both the relevant CIPFA Codes and the guidance issued by the Department for Levelling Up, Housing and Communities.

9 Risk assessment

- 9.1 Risks such as security of funds, liquidity, and interest rate risk are considered in the report. The limits and indicators chosen effectively set the Council's risk appetite.

10 Procurement implications

- 10.1 There are no procurement implications arising from this report.

11. Equalities and Human Rights implications / Public Sector Equality Duty

- 11.1 There are no direct equality or human rights implications arising from this report. However, it is recognised that the Council's investment choices may have an indirect effect on social issues. The investment management industry has begun to add social issues such as human rights and equality to its criteria for selecting investments and although this is at an early stage officers will work with its advisers as to how it can positively contribute in this area.

12 Environmental Implications

- 12.1 There are no direct environmental implications attributable to the recommended strategies. However, it is recognised that the Council's investment choices may have an indirect effect on the environment. Officers will work with its advisers as to how it can positively and constructively use its investments to reduce impact on the environment.

13 Other Considerations

- 13.1 There are no other considerations to take into account.

Appendix A Economic background and interest rate forecast

Economic background

The ongoing impact on the UK from the war in Ukraine, together with higher inflation, higher interest rates, uncertain government policy, and a deteriorating economic outlook, will be major influences on the Authority's treasury management strategy for 2023/24.

The Bank of England (BoE) increased Bank Rate by 0.75% to 3.0% in November 2022, the largest single rate hike since 1989 and the eighth successive rise since December 2021. The decision was voted for by a 7 to 2 majority of the Monetary Policy Committee (MPC), with one of the two dissenters voting for a 0.50% rise and the other for just a 0.25% rise.

The November quarterly Monetary Policy Report (MPR) forecast a prolonged but shallow recession in the UK with CPI inflation remaining elevated at over 10% in the near-term. While the projected peak of inflation is lower than in the August report, due in part to the government's support package for household energy costs, inflation is expected remain higher for longer over the forecast horizon and the economic outlook remains weak, with unemployment projected to start rising.

The UK economy grew by 0.2% between April and June 2022, but the BoE forecasts Gross Domestic Product (GDP) will decline 0.75% in the second half of the calendar year due to the squeeze on household income from higher energy costs and goods prices. Growth is then expected to continue to fall throughout 2023 and the first half of 2024.

In August 2021, the headline 3-month average annual growth rate for wages were 7.2% for total pay and 6.0% for regular pay. In real terms, after adjusting for inflation, total pay growth was up 4.7% while regular pay was up 3.4%. These figures should be interpreted with caution, however, as pay growth is now being impacted by base effects compared to 12 months ago when earnings were first affected by the coronavirus pandemic. Moreover, there has also been a fall in the number and proportion of lower paid jobs, helping to push up the average earnings figure.

CPI inflation is expected to peak at around 11% in the last calendar quarter of 2022 and then fall sharply to 1.4%, below the 2% target, in two years' time and to 0% in three years' time if Bank Rate follows the path implied by financial markets with a peak of around 5%. However the BoE has stated it considers this path may be too high, suggesting that the peak in interest rates will be lower, reducing the risk of inflation falling too far below target.

The labour market remains tight for now, with the most recent statistics showing the unemployment rate fell to 3.5%, driven mostly by a shrinking labour force. Earnings were up strongly in nominal terms by 6% for total pay and 5.4% for regular pay but factoring in inflation means real total pay was -2.4% and regular pay -2.9%. Looking forward, the MPR shows the labour market weakening in response to the deteriorating outlook for growth, leading to the unemployment rate rising to around 6.5% in 2025.

Interest rates have also been rising sharply in the US, with the Federal Reserve increasing the range on its key interest rate by 0.75% in November 2022 to 3.75%-4.0%. This was the fourth successive 0.75% rise in a pace of tightening that has seen

rates increase from 0.25%-0.50% in March 2022. Annual inflation has been slowing in the US but remains above 8%. GDP grew at an annualised rate of 2.6% between July and September 2022, a better-than-expected rise, but with official interest rates expected to rise even further in the coming months, a recession in the region is widely expected at some point during 2023.

Inflation has been rising consistently in the Euro Zone since the start of the year, hitting an annual rate of 10.7% in October 2022. Economic growth has been weakening with an expansion of just 0.2% in the three months to September 2022. As with the UK and US, the European Central Bank has been on an interest rate tightening cycle, pushing up its three key interest rates by 0.75% in October, the third major increase in a row, taking its main refinancing rate to 2% and deposit facility rate to 1.5%.

Credit outlook

Credit default swap (CDS) prices have followed an upward trend throughout the year, indicating higher credit risk. They have been boosted by the war in Ukraine, increasing economic and political uncertainty and a weaker global and UK outlook, but remain well below the levels seen at the beginning of the Covid-19 pandemic. CDS price volatility has been higher in 2022 compared to 2021 and this year has seen a divergence in prices between ringfenced (retail) and non-ringfenced (investment) banking entities once again.

The weakening economic picture during 2022 led the credit rating agencies to reflect this in their assessment of the outlook for the UK sovereign as well as several local authorities and financial institutions, revising them from to negative from stable.

There are competing tensions in the banking sector which could impact bank balance sheet strength going forward. The weakening economic outlook and likely recessions in many regions increase the possibility of a deterioration in the quality of banks' assets, while higher interest rates provide a boost to net income and profitability.

However, the institutions on our adviser Arlingclose's counterparty list remain well-capitalised and their counterparty advice on both recommended institutions and maximum duration remain under constant review and will continue to reflect economic conditions and the credit outlook.

Interest rate forecast:

The Authority's treasury management adviser Arlingclose forecasts that Bank Rate will continue to rise in 2022 and 2023 as the Bank of England attempts to subdue inflation which is significantly above its 2% target.

While interest rate expectations reduced during October and November 2022, multiple interest rate rises are still expected over the forecast horizon despite looming recession. Arlingclose expects Bank Rate to rise to 4.25% by June 2023 under its central case, with the risks in the near- and medium-term to the upside should inflation not evolve as the Bank forecasts and remains persistently higher.

Yields are expected to remain broadly at current levels over the medium-term, with 5-, 10- and 20-year gilt yields expected to average around 3.6%, 3.7%, and 3.9% respectively over the 3-year period to September 2025. The risks for short, medium and longer-term yields are judged to be broadly balanced over the forecast horizon. As ever,

there will undoubtedly be short-term volatility due to economic and political uncertainty and events.

	Current	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25
Official Bank Rate													
Upside risk	0.00	0.25	0.50	0.75	1.00	1.00	1.00	1.25	1.50	1.75	1.50	1.25	1.25
Arlingclose Central Case	3.00	3.50	4.00	4.25	4.25	4.25	4.25	4.00	3.75	3.50	3.50	3.50	3.50
Downside risk	0.00	0.25	0.50	0.75	0.75	0.75	0.75	0.75	1.00	1.00	1.00	1.00	1.00
3-month money market rate													
Upside risk	0.00	0.25	0.50	0.75	1.00	1.00	1.00	1.25	1.50	1.75	1.50	1.25	1.25
Arlingclose Central Case	3.00	3.90	4.40	4.40	4.40	4.35	4.30	4.25	4.00	3.75	3.75	3.75	3.75
Downside risk	0.00	0.25	0.50	0.75	0.75	0.75	0.75	0.75	1.00	1.00	1.00	1.00	1.00
5yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.36	3.65	3.90	3.90	3.90	3.90	3.80	3.70	3.60	3.50	3.40	3.30	3.20
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.46	3.70	3.75	3.75	3.75	3.70	3.70	3.70	3.70	3.70	3.70	3.70	3.70
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.88	4.00	4.00	4.00	4.00	4.00	3.90	3.90	3.90	3.90	3.90	3.90	3.90
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.24	3.40	3.40	3.40	3.40	3.40	3.30	3.30	3.30	3.30	3.30	3.30	3.30
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

PWLB Standard Rate (Maturity Loans) = Gilt yield + 1.00%

PWLB Certainty Rate (Maturity Loans) = Gilt yield + 0.80%

UKIB Rate (Maturity Loans) = Gilt yield + 0.60%

Appendix B Treasury Management Strategy

Mid-year position and forecast

- 1 On 30 September 2022 the Council held no borrowing and £88m of investments at market value; broken down as follows:

	Principal £m	Interest Rate %
Call accounts	4.1	0.3
Money Market Funds – call	13.0	1.7
Money Market Funds – cash plus or short bonds	13.0	0.7
Short-term deposits	29.0	2.0
Pooled Funds - Property	5.6	3.8
Pooled Funds – Multi-Asset	8.2	3.4
Pooled Funds – Equity	7.8	2.9
Pooled Funds – Bonds	5.0	2.6
REIT	2.0	2.3
Net Investments	87.7	2.1

- 2 Taking the forecasts within the capital strategy, the balance sheet of the Council can be projected to estimate the amounts available for investments. Below is the current projected analysis of the balance sheet to illustrate the trajectory of the Council's funds.

All figures at year-end £m	Actual 2021/22	Estimate 2022/23	Estimate 2023/24	Estimate 2024/25	Estimate 2025/26
CFR	33.6	32.7	31.8	30.9	30.0
Less external borrowing	0	0	0	0	0
Internal borrowing	33.6	32.7	31.8	30.9	30.0
Useable reserves, receipts, contributions held	91.7	92.2	86.8	81.5	75.0
Working capital/other balances	25.6	13.7	13.7	13.7	13.8
Estimated Investments	83.7	73.2	68.7	64.3	58.8

- 3 The Council's strategy has been to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing. In spite of the continuation of this, the Council is projected to hold significant investment balances even at the end of the financial year, which is the low point for cash. Investments levels are expected to fall over the period as reserves are used to finance capital spend and developer contributions flow out.

Borrowing Strategy

- 4 As shown above the Council is not expecting to borrow long term funds although it may need short-term borrowing if short term cash flow issues require it.
- 5 **Sources of borrowing:** The approved sources of long-term and short-term borrowing are:
- Public Works Loan Board
 - Any institution approved for investments (see below)
 - Any other bank or building society authorised to operate in the UK
 - UK public and private sector pension funds (except West Sussex County Council Pension Fund)
 - Capital market bond investors
 - UK Municipal Bond Agency and other special purpose companies created to enable joint local authority bond issues.
- 6 In addition, capital finance may be raised by the use of leases and hire purchase that are not borrowing, but may be classed as other debt liabilities.
- 7 The Council has historically raised its long-term borrowing from the PWLB. Changes to PWLB lending rules have added restrictions on local authorities planning to buy investment assets primarily for yield. Although the Council has no plans to borrow it will review its capital plans against the PWLB rules so it does not restrict access to PWLB in the future. In the event longer term borrowing is required the Council would consider long-term loans from other sources including banks, pensions and local authorities, and will investigate the possibility of issuing bonds and similar instruments, in order to lower interest costs and reduce over-reliance on one source of funding in line with the CIPFA Code.
- 8 **Municipal Bonds Agency:** UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It plans to issue bonds and lend the proceeds to local authorities. This will be a more complicated than the PWLB due to the need for the Council to provide some degree of guarantee to bond investors and the long lead times. Any decision to use the Agency will therefore be the subject of a separate report to full Council.
- 9 Short-term and variable rate loans leave the Council exposed to the risk of short-term interest rate rises and are therefore subject to the limit on the net exposure to variable interest rates in the treasury management indicators below.

Investment Strategy

- 10 The Council holds significant funds, representing income received in advance of expenditure plus balances and reserves held. In the past year, the Council's total investments have ranged between £74m and £102m and although the level of reserves is expected to reduce in the longer term, there will still be significant short to medium-term cash flow surpluses leading to larger sums being held than the core reserves of the Council would indicate. The current projections show year-end balances over £55m for the next three years.

- 11 Both the CIPFA Code and the Department For Levelling Up, Housing And Communities Guidance 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 objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the Council's long-term aim is to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested. This may not be possible in the high inflation environment of today but remains the long-term objective.
- 12 The Authority aims to be a responsible investor and will consider environmental, social and governance (ESG) issues when investing. However, realistically the Council does not have the resources to analyse all its investments for ESG considerations as it is a complex area with no clear and easily followed standards or ESG scoring mechanisms to follow. The council will work with its advisers and its fund managers in order to maximise its impact in this area and develop its approach over the medium term.
- 13 The Council expects to be a long-term investor and treasury investments will therefore include both short-term low risk instruments to manage day-to-day cash flows and longer-term instruments where limited additional risk is accepted in return for higher investment income. The existing portfolio of strategic pooled funds will be maintained to diversify risk into different sectors and maintain investment income. The Council will also explore the use of secured bonds and other ways to diversify its portfolio.
- 14 **Business models:** Under the IFRS9 standard, the accounting for certain investments depends on the Council's "business model" for managing them. The Council aims to achieve value from its internally managed treasury investments by a business model of collecting the contractual cash flows rather than buying and selling investments and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.
- 15 **Approved counterparties:** The Council may invest with any of the counterparty types in the table below; subject to the cash limits (per counterparty) and the time limits shown (when change from 22/23 limits the prior limit is shown):

Sector	Time limit	Counterparty limit	Sector limit
The UK Government	50 years	Unlimited	n/a
Local authorities	10 years	£5m	Unlimited
Governments and government entities rated A- and above	10 years (5 years)	£5m (£4m)	Unlimited
Secured investments rated AA and above	10 years (5 years)	£5m (£4m)	Unlimited
Secured investments rated A- to A+	13 months	£5m (£4m)	Unlimited
Banks (unsecured) rated A and above	13 months	£3m (£2.5m)	Unlimited
Banks (unsecured) rated A-	6 months	£3m (£2.5m)	Unlimited
Building societies (unsecured)	13 months	£1.25m (£1m)	£10m (£8m)
Registered providers (unsecured) Rated A-and above	5 years	£5m (£4m)	£10m (£8m)
Registered providers unrated(unsecured)	3 years	£4m (£3m)	
Money market funds	n/a	£6m (£5m)	£50m
Strategic pooled funds – Property, Equity, Bond and Diversified assets	n/a	£6m (£5m)	£30m
Real estate investment trusts	n/a	£5m	£5m
Other Corporates rated A- and above	1 year	£3m (£2.5m)	£5m
Unrated corporates	5 years	£50,000	£2m

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

- 16 **General inflationary increase to limits:** The changes in the table above are based on inflation since the limits were originally set in late 2014. Based on CPI the increase is 25%. Where limits have been increased or newly introduced since 2014 the inflation is not applied.
- 17 **Credit Rating:** Investment limits are set with reference to the lowest published long-term credit rating from Fitch, Moody's or Standard & Poor's. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account.
- 18 **Government:** Loans, bonds and bills issued or guaranteed by national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is an insignificant risk of

insolvency. On the basis that national and multilateral banks are extremely unlikely to default the time limit has been raised from five years to ten years. This is in line with the Council's adviser's normal limits. Investments with the UK Central Government may be made in unlimited amounts for up to 50 years.

- 19 **UK Local Authority:** The Council will consider investments with a UK local government body up to £5m for up to 10 years. The Council is confident that as a sector, local authorities are secure investments in the context of support from Central Government and the legal surcharging framework that guarantees debts will be paid. However, for any investment over six months the financial resilience of the relevant council will be checked with the Council's advisor.
- 20 **Secured Investments:** Investments secured on the borrower's assets, which limits the potential losses in the event of insolvency. The amount and quality of the security will be a key factor in the investment decision. Covered bonds and reverse repurchase agreements with banks and building societies are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit rating, the higher of the collateral credit rating and the counterparty credit rating will be used. The combined secured and unsecured investments with any one counterparty will not exceed the cash limit for secured investments.
- 21 The time limit here has been raised from five years to ten years. This is in line with the Council's adviser's normal limits. It reflects the security of the collateral which is highly rated and on a par with the UK government's rating.
- 22 **Banks Unsecured:** Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. See below for arrangements relating to operational bank accounts.
- 23 **Building Societies:** Although the regulation of building societies is no longer any different to that of banks the Council takes additional comfort from building societies' business model. The Council will therefore consider investing with unrated building societies where independent credit analysis shows them to be suitably creditworthy. A minimum asset size of £250m applies and limits of £1.25m per Society and £10m in total apply for unrated societies.
- 24 **Registered Providers:** Loans and bonds issued by, guaranteed by or secured on the assets of Registered Providers of Social Housing, formerly known as Housing Associations. These bodies are tightly regulated by the Regulator of Social Housing and, as providers of public services; they retain the likelihood of receiving government support if needed.

- 25 **Money market funds:** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. They have the advantage over bank accounts of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a small fee.
- 26 **Strategic pooled funds:** Bond, equity and property funds offer enhanced returns over the longer term, but are more volatile in the short term. These allow the Council to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives will be monitored regularly.
- 27 **Real estate investment trusts (REIT):** Shares in companies that invest mainly in real estate and pay the majority of their rental income to investors in a similar manner to pooled property funds. As with property funds, REITs offer enhanced returns over the longer term, but are more volatile especially as the share price reflects changing demand for the shares as well as changes in the value of the underlying properties. The Council will carry out a detailed appraisal and take expert advice before any investment.
- 28 **Corporates:** Loans, bonds and commercial paper issued by companies other than banks and registered providers. Non-bank companies cannot be bailed-in but can become insolvent placing the Authority's investment at risk. Loans to unrated companies will only be made either following an external credit assessment or to a maximum of £50,000 per company as part of a diversified pool in order to spread the risk widely.
- 29 **Operational bank accounts:** The Council may incur exposure through its current accounts to any UK bank with credit ratings no lower than BBB- and with assets greater than £25 billion. These are not classed as investments, but still subject to the risk of a bank bail-in and balances will therefore be kept below £3m. The Bank of England has stated that in the event of failure, banks with assets greater than £25 billion are more likely to be bailed-in than made insolvent, increasing the chance of the Council maintaining operational continuity. The Council currently banks with NatWest rated A.
- 30 **Risk Assessment and Credit Ratings:** Credit ratings are monitored by the Council's treasury advisors, who will notify changes in ratings as they occur. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:
- no new investments will be made,
 - any existing investments that can be ended at no cost will be, and

- full consideration will be given to the recall or sale of all other existing investments with the affected counterparty

- 31 Where a credit rating agency announces that a rating is on review for possible downgrade (also known as “rating watch negative” or “credit watch negative”) so that it may fall below the approved rating criteria, then no investments other than call investments will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.
- 32 **Other Information on the Security of Investments:** The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements 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 Council’s credit rating criteria.
- 33 When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2020, this is not generally reflected in credit ratings, but can be seen in other market measures. In those circumstances, the Council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Council’s cash balances, then the surplus will be deposited with the UK Government or with other local authorities. This will reduce investment income earned, but will protect the principal sum invested.
- 34 **Investment limits:** The Council’s revenue reserves available to cover investment losses were in the region of £24m on 31 March 2022, well above the stated minimum long-term target of £6m. In order that available reserves will cover the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government or Local Authority) will be £5m (increased from £4m). A group of banks under the same ownership will be treated as a single organisation for limit purposes. Limits will also be placed on fund managers, investments in brokers’ nominee accounts, and foreign countries as below. Investments in pooled funds and multilateral development banks do not count against the limit for any single foreign country, since the risk is diversified over many countries. Limits have been increased to reflect ‘real’ values’ taking general inflation into account.

Category	Cash limit
Any group of organisations under the same ownership	£5m (£4m) per group
Any group of pooled funds under the same management	£12m (£10m) per manager
Negotiable instruments held in a broker's nominee account	£22m (£20m) per broker
Foreign countries	£12m (£10m) per country

Cash flow management

- 35 The Council's officers maintain a detailed cash flow forecast for each coming year revising it as more information is available. This informs the short-term investments such as those to cover precept payments. The forecast is compiled on a prudent basis, with receipts under-estimated and payments over-estimated to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Long term investment strategy is based on the Council's medium term financial strategy.

Treasury Management Indicators

- 36 **Security benchmark: average credit rating** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk. The benchmark for 2023/24 will be an average credit rating of A unchanged from 2022/23.
- 37 **Liquidity benchmark:** The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing. For 2023/24 the benchmark amount available will be £3m unchanged from 2022/23.

Interest rate exposures

- 38 This indicator is set to control the Council's exposure to interest rate risk. Although no longer part of the formal CIPFA code this indicator is retained for local use. It is an upper limit on the one year revenue impact of a 1% rise or fall in interest rates. The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at current rates. It is increased to £300,000 from £250,000 to reflect the projected higher cash balances that are likely to persist in the next few years.

	Limit
Upper limit on one-year revenue impact of a 1% rise in interest rates	-£300,000
Upper limit on one-year revenue impact of a 1% fall in interest rates	£300,000

Maturity structure of borrowing

- 39 This indicator is set to control the Council's exposure to refinancing risk and is really most useful for councils with a portfolio of loans. The upper and lower limits on the maturity structure of fixed rate borrowing are shown below. The Council is not planning to borrow but will set limits to allow flexibility of term and maturity date for any new borrowing.

	Upper	Lower
Under 12 months	100%	0%
12 months and within 24 months	100%	0%
24 months and within five years	100%	0%
Five years and within 10 years	100%	0%
10 years and above	100%	0%

Principal sums invested for periods longer than a year

- 40 The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the total long-term principal sum invested to final maturities beyond the period end will be as below unchanged from last year:

	2023/24	2024/25	2025/26	No fixed date
Limit on principal invested beyond year end	£16m	£14m	£12m	£35m

- 41 Long-term investments with no fixed maturity date include strategic pooled funds and real estate investment trusts but exclude money market funds and bank accounts with no fixed maturity date as these are considered short-term. This is a new indicator following the updated CIPFA code.

Other Treasury Management issues

- 42 **Financial Derivatives:** Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in Section 1 of the *Localism Act 2011* removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment).
- 43 The Council will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Council is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be taken into account when determining the overall level of risk. Embedded derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

- 44 Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria, assessed using the appropriate credit rating for derivative exposures. The current value of any amount due from a derivative counterparty will count against the counterparty credit limit and the relevant foreign country limit.
- 45 In line with the CIPFA Code, the Authority will seek external advice and will consider that advice before entering into financial derivatives to ensure that it fully understands the implications.
- 46 **Markets in Financial Instruments Directive:** The Council has opted up to professional client status with its providers of financial services allowing it access to a greater range of services but without the greater regulatory protections afforded to individuals and small companies. The Director of Resources believes this to be the most appropriate status.

Appendix C Investment Strategy

1. This Investment Strategy meets the requirements of statutory guidance widening the coverage beyond strict treasury investments. It focuses on the financial support of local public services by lending to or buying shares in other organisations or its own subsidiaries (service investments) and commercial property investment income.

Service Investments: Loans

2. The Council can lend money to local bodies or its subsidiaries to support local public services and stimulate local economic growth. Historically the Council has only lent to local bodies in very limited circumstances where a significant service outcome is expected. At present only one £300,000 loan to a local body has been made to a community run leisure centre for it to develop a specific local service.
3. There is no intention to increase the use of loans to local bodies and they are expected to be infrequent. The Council will, however, be lending to a subsidiary in the guise of its housing company. The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the Council, upper limits on the outstanding exposure has been set at £4m which is a £1m increase from last year. This reflects the housing company's projects for next year. The Council controls its subsidiary so is in a position to determine the level of risk it takes on.
4. Accounting standards require the Council to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Council's statement of accounts will be shown net of this loss allowance. However, the Council makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments.
5. **Risk assessment:** The Council assesses the risk of loss before entering into service loans by assessing the counterparty's resilience, the service users' needs that the loan is designed to help meet and how these will evolve over time. During the life of the loan any change in original assumptions will be monitored. The Council will use external advisors if felt appropriate by the Director of Resources. All loans will be subject to contract agreed by Head of Legal. All new classes of loans must be approved by full Council and will be monitored by Director of Resources.

Service Investments: Shares

6. The Council does not currently intend to invest in any shares except for in its own housing company where £0.5m has been invested. The overall limit for 2023/24 is £0.5m and no further equity funding is currently planned.
7. **Security:** One of the risks of investing in shares is that they potentially fall in value meaning that the initial outlay may not be recovered. In order to limit this risk upper limits on the sum invested in subsidiaries will be set at the lowest practical level if and when exposure is allowed.
8. **Risk assessment:** The Council would assess the risk of loss before entering into and whilst holding shares by going through an extensive process of risk analysis. The risk analysis will include an assessment of the market that the subsidiary will be active in including the nature and level of competition, how the market will evolve over time, the barriers to entry and exit and any ongoing investment requirements. The Council will use external advisors as thought appropriate by Director of Resources.
9. **Liquidity:** Although this type of investment is fundamentally illiquid, in order to limit this the Council, when it sets a limit in this area, will initially set out the maximum periods for which funds may prudently be committed and how the Council will ensure it stays within its stated investment limits. The life of the housing companies has not been explicitly set but the invested equity will be reviewed at a five-year interval.
10. **Non-specified Investments:** Shares are the only investment type that the Council has identified that meets the definition of a non-specified investment in the government guidance. The limits above on share investments are therefore also the Council's required upper limits on non-specified investments. The Council has not adopted any procedures for determining further categories of non-specified investment since none are likely to meet the definition.

Commercial Investments: Property

11. The Council invests in commercial property within the District in order to make a return that will be spent on local public services. These include retail units, business centres, and commercial leisure facilities. They contributed £3.5m of income net of direct costs in 2021/22 providing a significant support to the Council's finances.
12. The table below lists the properties by major category and by whether they are 'legacy' properties, which is taken as having been on the Council's books on 31 March 2007, or the acquisitions and developments since then. The reason for the choice of 31 March 2007 is twofold: firstly, this was the date of the

implementation of asset accounting under the international financial reporting standard that required the Council to keep detail records of historic asset values and secondly it separates out the last decade or so when the recent purchases are reported. It is these more recent purchases which were made to provide commercial income to support the Council's budget which are of more concern to CIPFA and its latest guidance. For the recent purchases the cost records are available whereas the Council does not have comprehensive records of actual purchase costs so the 31 March 2007 values are used.

Property by type £millions	Actual	31.3.2022 actual		31.3.2023 expected	
	Purchase cost or 31 March 2007 value	Gains or losses	Value in accounts	Gains or losses	Value in accounts
Retail – legacy	2.7	2.0	4.7	1.8	4.5
Retail – Swan Walk	9.5	-7.6	1.9	-7.7	1.8
Light industrial - legacy	9.3	10.3	19.6	10.3	19.6
Healthcare – legacy	6.5	1.9	8.4	1.9	8.4
Office - legacy	1.3	0.7	2.0	0.7	2.0
Retail - recent	14.6	-5.1	9.5	-5.5	9.1
Light industrial – recent	6.3	3.7	10.0	3.7	10.0
Healthcare – recent	0.6	0.3	0.9	0.3	0.9
Education -recent	1.8	-0.1	1.7	-0.1	1.7
Leisure – recent	1.5	-0.6	0.9	-0.6	0.9
Total	54.1	5.5	59.6	4.8	58.9

13. In the table above the Swan Walk Centre has been taken out of the legacy retail category as it has a significant effect and has its own distinct history. The major loss in value is due to the movement of the valuation of the Council's equity share in Swan Walk. A true separable purchase price for the Swan Walk equity share is not available as the Swan Walk development was a complex set of multiparty arrangements rather than a simple purchase.
14. The values at year-end are uncertain so no significant movement in values is predicted. Values were recovering well after the pandemic but high interest rates and a wider recession may have an effect. The estimates for the end of 2022/23 above assume values broadly hold their value apart from retail, where recession may have an effect, so a reduction of 5% has been applied.
15. **Security:** In accordance with government guidance, the Council considers a property investment to be secure if its accounting valuation is at or higher than its purchase cost including taxes and transaction costs.

16. The fair value assessment of the Council's investment property portfolio is above the 'purchase' cost which means that the whole portfolio does provide 'security' in terms of the government guidance.
17. The Head of Property and Facilities has considered the prospects for the overall value of the portfolio and bearing in mind it is normal for assets within the portfolio to perform differently depending on market conditions concludes that the best course of action is to hold the assets for the long term as they are sound assets with dependable income streams.
18. The commercial properties are revalued each year-end by an external valuer so should the audited values at the end of 2022/23 fall below their purchase price the Head of Property and Facilities will consider whether the current course of action of holding the assets is appropriate and bring any alternative actions to Council in an update to the Investment Strategy. This is in line with the current government guidance.
19. **Risk assessment:** The Council has no budgeted plans to expand its portfolio in 2023/24 but should there be a change the Council would assess the risk of loss before entering into and whilst holding property investments by :
 - assessing any plans against the CIPFA Code and Government guidance
 - assessing the relevant market including the level of competition, the barriers to entry and exit and future market prospects;
 - using advisors if thought appropriate by the Director of Resources;
 - consulting Policy Development Advisory Group for Finance & Parking
 - taking final comprehensive report on all new investments to Cabinet
 - continually monitoring risk in the whole portfolio and any specific assets
20. **Liquidity:** Clearly property is relatively difficult to sell at short notice, and can take a considerable period to sell in certain market conditions. To ensure that the invested funds can be accessed when they are needed the Head of Property and Facilities ensures that at least £5m of commercial property could be sold as a going concern within a six-month period.

Loan Commitments and Financial Guarantees

21. Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the Council and are included here for completeness. The Council plans to provide loan commitments up to £4m to its Housing Company subsidiary. It does not plan to provide any guarantees in the near future.

Proportionality

- 22 The Council is dependent on profit generating investment activity to achieve a balanced revenue budget. The table below shows the extent to which the expenditure planned to meet the service delivery objectives is dependent on achieving the expected net profit from investments over the lifecycle of the Medium-Term Financial Strategy. The figures are best estimates bearing in mind the uncertainty due to the challenging economic position. They assume a reasonably robust level of rents, which may be threatened by a prolonged and deep recession.

<i>Proportionality of Investments £m</i>	2021/22 Actual	2022/23 Forecast	2023/24 Budget	2024/25 Budget	2025/26 Budget
Gross service expenditure	42	44	46	46	46
Investment income	3.5	3.7	3.7	3.8	4.0
Proportion	8%	8%	8%	8%	9%

23 Capacity, Skills and Culture

Elected Members and statutory officers: The Council recognises that those elected Members and statutory officers involved in the investments decision making process must have appropriate capacity, skills and information to enable them to:

- take informed decisions as to whether to enter into a specific investment;
- assess individual assessments in the context of the strategic objectives and risk profile of the Council; and
- understand how new decisions have changed the overall risk exposure of the Council.

The Council will ensure that the relevant officers and the Members of Audit Committee and Policy Development Advisory Group for Finance & Parking have appropriate skills, providing training and advisor support where there is a skills gap.

- 24 **Commercial deals:** The Council will ensure that the Audit Committee, Policy Development Advisory Group for Finance & Parking, Cabinet, and officers negotiating commercial deals are aware of the core principles of the prudential framework and of the regulatory regime within which local authorities operate.
- 25 **Corporate governance:** Any investment decisions will be scrutinised by Senior Leadership Team, Policy Development Advisory Group for Finance & Parking and Cabinet before final approval. The Overview and Scrutiny committee review

all decisions made by the Cabinet. Although after the event, the Committee can make any recommendations to the Council if it sees fit.

Investment Indicators

26 The Council has set the following quantitative indicators to allow elected Members and the public to assess its total risk exposure as a result of its investment decisions.

27 **Total risk exposure:** The first indicator shows the total exposure to potential investment losses.

Total investment exposure £m	31.03.2022 Actual	31.03.2023 Forecast	31.03.2024 Forecast
Treasury management investments	84	73	69
Service investments: Loans	0.0	0.4	2.0
Service investments: Shares	0.1	0.3	0.3
Commercial investments: Property	60	59	59
TOTAL INVESTMENTS	144.1	132.7	130.3
Commitments to lend	0	0	0
Guarantees issued on loans	0	0	0
TOTAL EXPOSURE	144.1	132.7	130.3

28 **How investments are funded:** Government guidance is that these indicators should include how investments are funded. Since the Council does not have any borrowing the Council's investments are funded by usable reserves and income received in advance of expenditure.

29 **Rate of return received:** This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred.

Investments net rate of return	2021/22 Actual	2022/23 Forecast	2023/24 Forecast
Treasury management investments	1.2%	2.5%	3.4%
Service investments: Loans	0%	0%	4%
Service investments: Shares	0%	0%	0%
Commercial investments: Property	5.8%	6.3%	6.3%
ALL INVESTMENTS	3.1%	4.2%	4.7%

30 **Other indicators:** The Department for Levelling Up, Housing and Communities guidance lists other indicators and the Council has selected the indicators below as appropriate. It assumes a steady recovery from the pandemic. The final write off position will take some time to crystallise.

Indicator	2021/22 Actual	2022/23 Forecast	2023/24 Forecast
Debt to net service expenditure ratio	0%	0%	0%
Commercial income to net service expenditure ratio	34%	33%	33%
Income net of direct cost return target	5.8%	6.3%	6.3%
Operating overheads of property section attributable to commercial property as a proportion of net property income	6.6%	6.5%	6.5%
Average Vacancy levels	2%	3%	3%
Tenant over 5% of net property income	6	5	5
Weighted Average Unexpired Lease Term (WAULT)	14yr	14yr	14yr
Bad debts written off	£164,000	£200,000	£200,000