

Treasury Management Strategy 2011/12 – 2013/14

1. Background

- 1.1. The Chartered Institute of Public Finance and Accountancy's Code of Practice for Treasury Management in Public Services (the "CIPFA TM Code") and the Prudential Code require local authorities to determine the Treasury Management Strategy Statement (TMSS) and Prudential Indicators on an annual basis. The TMSS also incorporates the Investment Strategy as required under WAG's Investment Guidance.
- 1.2. CIPFA has defined Treasury Management as:
"the management of the organisation's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."
- 1.3. The Council is responsible for its treasury decisions and activity. No treasury management activity is without risk. The successful identification, monitoring and control of risk are integral element to treasury management activities and include Credit and Counterparty Risk, Liquidity Risk, Market or Interest Rate Risk, Refinancing Risk and Legal and Regulatory Risk.
- 1.4. The strategy takes into account the impact of the Council's Revenue Budget and Capital Programme on the Balance Sheet position, the current and projected Treasury position (page 29), the Prudential Indicators and the outlook for interest rates (page 30).
- 1.5. The purpose of this TMSS is to approve:
 - Treasury Management Strategy for 2011-12 (Borrowing and Debt Rescheduling - Section 3, Investments - Section 4)
 - Prudential Indicators – (NB: the Authorised Limit is a statutory limit)
 - MRP Statement – Section 7
 - Use of Specified and Non-Specified Investments – page 32 & 36
- 1.6. The Executive Board approved the adoption of the CIPFA Treasury Management Code at its meeting on 19 March 2002 (DFIS/20/02). The Council has incorporated the changes from the revised CIPFA Code of Practice into its treasury policies, procedures and practices.
- 1.7. All treasury activity will comply with relevant statute, guidance and accounting standards.

2.4. Capital expenditure is expected to be financed as follows:

Capital Financing	2010/11 Approved £m	2010/11 Revised £m	2011/12 Estimate £m	2012/13 Estimate £m	2013/14 Estimate £m
Capital receipts	7.8	3.5	7.8	3.9	1.3
Government Grants	22.1	20.9	19.2	17.4	10.2
WAG Invest to Save Fund – Solar Panels	0.0		0.1		
Major Repairs Allowance	7.6	7.6	7.6	7.6	7.6
Revenue contributions	3.2	4.3	5.0	4.7	4.7
HRA Revenue Contributions - Solar Panels			1.5	1.5	
Revenue Reserves	1.2	1.0	0.0	0.0	0.0
Total Financing	41.9	37.3	41.2	35.1	23.8
Supported borrowing	6.2	6.2	4.6	3.4	3.4
Unsupported borrowing	2.9	2.8	0.8	0.0	0.0
Unsupported Borrowing – Solar Panels	0.0		14.3	11.0	
Total Funding	9.1	9.0	19.7	14.4	3.4
Total Financing and Funding	51.0	46.3	60.9	49.5	27.2

Note: Solar Panels expenditure and financing is subject to further confirmation

Incremental Impact of Capital Investment Decisions:

2.5. As an indicator of affordability the table below shows the impact of capital investment decisions on Council Tax and Housing Rent levels. The incremental impact is calculated by comparing the total revenue budget requirement of the current approved capital programme with an equivalent calculation of the revenue budget requirement arising from the proposed capital programme.

Incremental Impact of Capital Investment Decisions	2010/11 Approved £	2011/12 Estimate £	2012/13 Estimate £	2013/14 Estimate £
Increase in Band D Council Tax	32.47	59.66	75.95	74.04
Increase in Average Weekly Housing Rents	0	0	0	0

Note: the proposed unsupported borrowing for Solar Panels will have no impact on Housing Rents.

2.6. The estimate for interest payments in 2011/12 is £7.9m and for interest receipts is £0.6m. The ratio of financing costs to the Council's net revenue stream is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet borrowing costs. The ratio is based on costs net of investment income.

Ratio of Financing Costs to Net Revenue Stream	2010/11 Approved £m	2010/11 Revised £m	2011/12 Estimate £m	2012/13 Estimate £m	2013/14 Estimate £m
Non-HRA	5.6	5.48	5.18	4.89	4.83
HRA	3.44	3.35	3.68	4.96	5.29

3. **Borrowing and Rescheduling Strategy**

3.1. The Council's balance of Actual External Debt at 31 March 2010 (gross borrowing plus other long-term liabilities) is shown on page 29. This Prudential Indicator is measured in a manner consistent for comparison with the Operational Boundary and Authorised Limit.

3.2. The **Authorised Limit** sets the maximum level of external borrowing on a gross basis (i.e. not net of investments) and is the statutory limit determined under Section 3(1) of the Local Government Act 2003 (referred to in the legislation as the Affordable Limit).

Authorised Limit for External Debt	2010/11 Approved £m	2010/11 Revised £m	2011/12 Estimate £m	2012/13 Estimate £m	2013/14 Estimate £m
Borrowing	187.9	202.2	199.4	195.4	194.8
Other Long-term Liabilities	16.1	17.1	16.2	15.3	15.0
Total	204.0	219.3	215.6	210.7	209.8

3.3. The **Operational Boundary** links directly to the Council's estimates of the CFR and estimates of other cashflow requirements. This indicator is based on the same estimates as the Authorised Limit reflecting the most likely, prudent but not worst case scenario but without the additional headroom included within the Authorised Limit.

Operational Boundary for External Debt	2010/11 Approved £m	2010/11 Revised £m	2011/12 Estimate £m	2012/13 Estimate £m	2013/14 Estimate £m
Borrowing	177.9	192.2	189.4	185.4	184.8
Other Long-term Liabilities	16.1	17.1	16.2	15.3	15.0
Total	194.0	209.3	205.6	200.7	199.8

3.4. The Chief Finance & Performance Officer has delegated authority, within the total limit for any individual year, to effect movement between the separately agreed limits for borrowing and other long-term liabilities. Decisions will be based on the outcome of financial option appraisals and best value considerations. Any movement between these separate limits will be reported to the next meeting of the Executive Board

3.5. In conjunction with advice from its treasury advisor, Arlingclose Ltd, the Council will keep under review the following borrowing options:

- PWLB loans
- Borrowing from other local authorities

- Borrowing from institutions such as the European Investment Bank and directly from Commercial Banks
- Borrowing from the Money Markets
- Local authority stock issues
- Local authority bills
- Structured finance

3.6. Notwithstanding the issuance of Circular 147 on 20th October following the CSR announcement which increases the cost of new local authority fixed rate loans to 1% above the cost of the Government's borrowing, the PWLB remains an attractive source of borrowing, given the transparency and control that its facilities continue to provide. The types of PWLB borrowing that are considered appropriate for a low interest rate environment are:

- Variable rate borrowing
- Medium-term year Equal Instalments of Principal (EIP) or Annuity Loans
- Long-term Maturity loans, where affordable

Capital expenditure levels, market conditions and interest rate levels will be monitored during the year in order to minimise borrowing costs over the medium to longer term and maintaining stability. The differential between debt costs and investment earnings, despite long term borrowing rates being at low levels, remains acute and this is expected to remain a feature during 2011/12. The "cost of carry" associated with medium- and long-term borrowing compared to temporary investment returns means that new fixed rate borrowing could entail additional short-term costs. The use of internal resources in lieu of borrowing may again, in 2011/12, be the most cost effective means of financing capital expenditure.

3.7. PWLB variable rates are expected to remain low as the Bank Rate is maintained at historically low levels for an extended period. Exposure to variable interest rates will be kept under regular review. Each time the spread between long-term rates and variable rates narrows by 0.50%, this will trigger a formal review point and options will be considered in conjunction with the Authority's Treasury Advisor and decisions taken on whether to retain the same exposure or change from variable to fixed rate debt.

3.8. The Council has £23.8m loans which are LOBO loans (Lender's Options Borrower's Option) of which £14.3m of loans are currently in or will be in their call period in 2011/12. In the event that the lender exercises the option to change the rate or terms of the loan, the Council will consider the terms being provided and also repayment of the loan without penalty. The Council may utilise cash resources for repayment or may consider replacing the loan(s) by borrowing from the PWLB. The default response will however be early repayment without penalty.

3.9. The rationale for rescheduling would be one or more of the following:

- Savings in interest costs with minimal risk
- Balancing the volatility profile (i.e. the ratio of fixed to variable rate debt) of the debt portfolio
- Amending the profile of maturing debt to reduce any inherent refinancing risks. As opportunities arise, they will be identified by Arlingclose and discussed with the Council's officers.

3.10. Borrowing and rescheduling activity will be reported to the Executive Board.

3.11. The following Prudential Indicators allow the Council to manage the extent to which it is exposed to changes in interest rates. The upper limit for variable rate exposure has been set to ensure that the Council is not exposed to interest rate rises which could adversely impact on the revenue budget. The limit allows for the use of variable rate debt to offset exposure to changes in short-term rates on investments.

The Council currently has no variable rate debt.

	2010/11 Approved £m	2010/11 Revised £m	2011/12 Estimate £m	2012/13 Estimate £m	2013/14 Estimate £m
Upper Limit for Fixed Interest Rate Exposure	7.3	8.1	8.1	8.3	8.6
Upper Limit for Variable Interest Rate Exposure	2.1	2.3	2.3	2.4	2.5

3.12. The Council will also limit and monitor large concentrations of fixed rate debt needing to be replaced. Limits in the following table are intended to control excessive exposures to volatility in interest rates when refinancing maturing debt.

Maturity structure of fixed rate borrowing	Existing level at 31/03/10 %	Lower Limit for 2011/12 %	Upper Limit for 2011/12 %
under 12 months	2	0	20
12 months and within 24 months	3	0	20
24 months and within 5 years	1	0	20
5 years and within 10 years	4	0	80
10 years and within 20 years	16	0	80
20 years and within 30 years	6	0	80
30 years and within 40 years	14	0	80
40 years and within 50 years	54	0	80
50 years and above	0	0	90

4. **Investment Policy and Strategy**

4.1. Guidance from WAG on Local Government Investments in Wales requires that an Annual Investment Strategy (AIS) be set.

4.2. The Council's investment priorities are:

- security of the invested capital;
- liquidity of the invested capital;
- an optimum yield which is commensurate with security and liquidity.

4.3. Investments are categorised as 'Specified' or 'Non Specified' investments based on the criteria in the WAG Guidance. Potential instruments for the Council's use within

its investment strategy are contained on page 32. The Chief Finance and Performance Officer, under delegated powers, will undertake the most appropriate form of investments in keeping with the investment objectives, income and risk management requirements and Prudential Indicators. Decisions taken on the core investment portfolio will be reported to the Executive Board.

- 4.4. Changes to investment strategy for 2011/12 include:
 - AAA-rated Variable Net Asset Value (VNAV) Money Market Funds
 - T-Bills
 - LA Bills
 - Term deposits in Sweden
 - Maximum duration for new deposits 2 years
- 4.5. The Council's current level of investments is presented at page 29.
- 4.6. The Council's in-house investments are made with reference to the outlook for the UK Bank Rate and money market rates.
- 4.7. In any period of significant stress in the markets, the default position is for investments to be made with the Debt Management Office or UK Treasury Bills. (The rates of interest from the DMADF are below equivalent money market rates, but the returns are an acceptable trade-off for the guarantee that the Council's capital is secure.)
- 4.8. The Council selects countries and the institutions within them (see page 36), for the counterparty list after analysis and careful monitoring of:
 - Credit Ratings (minimum long-term A+ for counterparties; AA+ for countries)
 - Credit Default Swaps (where quoted)
 - GDP; Net Debt as a Percentage of GDP
 - Sovereign Support Mechanisms/potential support from a well-resourced parent institution
 - Share Prices (where quoted)
 - Macro-economic indicators
 - Corporate developments, news and articles, market sentiment.
- 4.9. The Council and its Treasury Advisors, Arlingclose, will continue to analyse and monitor these indicators and credit developments on a regular basis and respond as necessary to ensure security of the capital sums invested.
- 4.10. The UK Bank Rate has been maintained at 0.5% since March 2009, and is anticipated to remain at low levels throughout 2011/12. Short-term money market rates are likely to remain at very low levels for an extended period which will have a significant impact on investment income.
- 4.11. To protect against a lower for longer prolonged period of low interest rates and to provide certainty of income, 2-year deposits and longer-term secure investments will be actively considered within the limits the Council has set for Non-Specified Investments (see page 36). The longer-term investments will be likely to include:
 - Term Deposits with counterparties rated at least A+ (or equivalent)

- Supranational Bonds (bonds issued by multilateral development banks): Even at the lower yields likely to be in force, the return on these bonds will provide certainty of income against an outlook of low official interest rates.

4.12. The Council has placed an upper limit for principal sums invested for over 364 days, as required by the Prudential Code. This limit is to contain exposure to the possibility of loss that may arise as a result of the Council having to seek early repayment of the sums invested.

No 12	Upper Limit for total principal sums invested over 364 days	2010/11 Approved £m	2010/11 Revised £m	2011/12 Estimate £m	2012/13 Estimate £m	2013/14 Estimate £m
		15	15	15	15	15

5. Outlook for Interest Rates

5.1 The economic interest rate outlook provided by the Council's treasury advisor, Arlingclose Ltd, is on page 30. The Council will reappraise its strategy from time to time and, if needs be, realign it with evolving market conditions and expectations for future interest rates.

6. Balanced Budget Requirement

6.1. The Council complies with the provisions of S32 of the Local Government Finance Act 1992 to set a balanced budget.

7. 2011/12 MRP Statement

7.1. The Local Authorities (Capital Finance and Accounting)(Wales)(Amendment) Regulations 2008 (SI 2008/588 (W.59)) place a duty on local authorities to make a prudent provision for debt redemption. Guidance on Minimum Revenue Provision has been issued by the Secretary of State and local authorities are required to "have regard" to such Guidance under section 21(1A) of the Local Government Act 2003.

7.2. The four MRP options available are:

- Option 1: Regulatory Method
- Option 2: CFR Method
- Option 3: Asset Life Method
- Option 4: Depreciation Method

NB This does not preclude other prudent methods.

7.3. MRP in 2011/12: Options 1 and 2 may be used only for supported expenditure. Methods of making prudent provision for self financed expenditure include Options 3 and 4 (which may also be used for supported expenditure if the Council chooses).

7.4. The MRP Statement will be submitted to Council before the start of the 2011/12 financial year. If it is ever proposed to vary the terms of the original MRP Statement during the year, a revised statement should be put to Council at that time.

The Council will apply Option 2 in respect of supported capital expenditure and Option 3 in respect of unsupported capital expenditure and MRP in respect of leases brought

on Balance Sheet under the IFRS-based Code of Practice will match the annual principal repayment for the associated deferred liability.

8. **Monitoring and Reporting on the Treasury Outturn and Prudential Indicators**

Treasury activity is and the Prudential Indicators will be monitored through the year by the Chief Finance and Performance Officer and reported as follows:

- (a) To the Executive Board in October and January against the strategy approved for the year.
- (b) The Council will produce an outturn report on its treasury activity no later than 30th September after the financial year end.
- (c) The Finance and Performance Scrutiny Committee will be responsible for the scrutiny of treasury management activity and practices.

9. **Other Items** **Training**

CIPFA's Code of Practice requires the Chief Finance and Performance Officer to ensure that all members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities.

Reviewing and addressing training needs: Periodic Workshops on Treasury Management, to which all Members are invited, are arranged

Investment Consultants

WAG's Guidance on local government investments recommend that the Investment Strategy should state:

- Whether and, if so, how the authority uses external contractors offering information, advice or assistance relating to investment – The Council has engaged Arlingclose Ltd to provide these services and
- How the quality of any such service is controlled. The quality of the service provided by the Council's Treasury consultants is generally controlled by competitive tendering every 3 years. However, in order to maintain flexibility of service provision during the current period of Council transformation, the retendering due at the end of the current consultancy contract in March 2011 has been postponed, and the Chief Finance and Performance Officer has authorised the extension of the contract with Arlingclose for a further 2 years from April 2011.

EXISTING PORTFOLIO PROJECTED FORWARD

	31 Mar 10 Actual Portfolio £m	%	31 Mar 11 Estimate £m	31 Mar 12 Estimate £m	31 Mar 13 Estimate £m	31 Mar 14 Estimate £m
External Borrowing:						
Fixed Rate – PWLB	109.1	72	106.6	102.6	102.6	102.3
Fixed Rate – Market	23.8	16	23.8	23.8	23.8	23.8
Variable Rate – PWLB	0	0	0	0	0	0
Variable Rate – Market	0	0	0	0	0	0
Total External Borrowing	132.9		130.4	126.4	126.4	126.1
Existing long-term liabilities						
IFRS Long Term Liabilities:						
- PFI	15.7	10	15.4	15.2	14.8	14.8
- Finance Leases	2.4	2	1.7	1.0	0.5	0.2
Total Gross External Debt	151.0	100	147.5	142.7	141.7	141.1
Investments:						
<i>Managed in-house</i>						
- Short-term monies (Deposits/ monies on call /MMFs)	34.0	100	25.0	22.1	20.7	22.0
- Long-term investments (maturities over 12 months)	0	0	0	0	0	0
Total Investments	34.0	100	25.0	22.1	20.7	22.0
(Net Borrowing Position)/ Net Investment position	117.0		122.5	120.6	121.0	119.1

Arlingclose's Economic and Interest Rate Forecast

	Mar-11	Jun-11	Sep-11	Dec-11	Mar-12	Jun-12	Sep-12	Dec-12	Mar-13	Jun-13	Sep-13	Dec-13	Mar-14
Official Bank Rate													
Upside risk	0.25	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Central case	0.50	0.50	0.75	1.00	1.25	1.50	2.00	2.50	2.75	2.75	3.00	3.00	3.00
Downside risk	-	-	- 0.25	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50
1-yr LIBID													
Upside risk	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Central case	1.65	1.90	2.15	2.40	2.50	2.50	2.75	3.00	3.25	3.50	3.50	3.50	3.50
Downside risk	- 0.25	- 0.25	- 0.25	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50	- 0.50
5-yr gilt													
Upside risk	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Central case	2.75	3.00	3.25	3.50	3.75	4.00	4.00	4.00	4.00	4.00	4.25	4.25	4.00
Downside risk	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25
10-yr gilt													
Upside risk	0.25	0.25	0.25	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Central case	3.90	4.00	4.10	4.25	4.50	4.75	4.75	4.75	4.75	4.75	5.00	5.00	4.75
Downside risk	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25
20-yr gilt													
Upside risk	0.25	0.25	0.25	0.25	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Central case	4.50	4.75	5.00	5.00	5.00	5.00	5.00	5.00	5.00	5.00	5.25	5.25	5.00
Downside risk	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25
50-yr gilt													
Upside risk	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Central case	4.25	4.50	4.75	4.75	4.75	4.75	4.50	4.50	4.50	4.50	4.75	4.75	4.50
Downside risk	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25	- 0.25

- The recovery in growth is likely to be slow and uneven.
- The initial reaction to the CSR is positive, but implementation risks remain.
- The path of base rates reflects the fragility of the recovery and the significantly greater fiscal tightening of the emergency budget. With growth and underlying inflation likely to remain subdued, the Bank will stick to its lower for longer stance on policy rates.
- Uncertainty surrounding Eurozone sovereign debt and the risk of contagion will remain a driver of global credit market sentiment.

Underlying assumptions:

- The framework and targets announced in the Comprehensive Spending Review (CSR) to reduce the budget deficit and government debt will be put to the test; meeting the 2010 borrowing target of £149bn will be crucial to the gilt market's confidence in the credibility of the deficit reduction plans.
- Despite Money Supply being weak and growth prospects remaining subdued the MPC have gravitated towards increasing rates in the new year as global inflation continues to rise along with household inflation.
- Consumer Price Inflation is stubbornly above 3% and is likely to spike above 4% in the first quarter of 2011 as a result of VAT, Utilities and Rail Fares.
- Unemployment remains near a 16 year high, at just over 2.5 Million, and is set to increase as the Public Sector shrinks. Meanwhile employment is growing but this is mainly due to part time work, leaving many with reduced income.
- Recently announced Basel III capital/liquidity rules and extended timescales are positive for banks. Restructuring of UK banks' balance sheets is ongoing and

expected to take a long time to complete. This will be a pre-condition for normalisation of credit conditions and bank lending.

- Mortgage repayment, a reduction in net consumer credit and weak consumer confidence are consistent with lower consumption and therefore the outlook for growth.
- The US Federal Reserve downgraded its outlook for US growth; the Fed is concerned enough to signal further QE through asset purchases. Industrial production and growth in the Chinese economy are showing signs of slowing. Both have implications for the global economy.

Specified and Non Specified Investments

Specified Investments identified for use by the Council

Specified Investments will be those that meet the criteria in the WAG Guidance, i.e. the investment

- is sterling denominated
- has a maximum maturity of 1 year
- the making of which is not defined as capital expenditure under section 20(1)(d) in SI 2003 No 3239 (W.319) (i.e. the investment is not loan capital or share capital in a body corporate).
- Either one or both of the following conditions is met:
 - is made with the UK government or is made with a local authority in England, Wales Scotland and Northern Ireland.
 - meets the “high” credit criteria as determined by the Authority
- the principal sum to be repaid at maturity is the same as the initial sum invested other than investments in the UK Government.

“Specified” Investments identified for the Council’s use are:

- Deposits in the DMO’s Debt Management Account Deposit Facility
 - Deposits with UK local authorities
 - Deposits with banks and building societies
 - *Certificates of deposit with banks and building societies
 - *Gilts: (bonds issued by the UK government)
 - *Bonds issued by multilateral development banks
 - Treasury-Bills (T-Bills)
 - Local Authority Bills (LA Bills)
 - AAA-rated Money Market Funds with a Constant Net Asset Value (CNAV)
 - AAA-rated Money Market Funds with a Variable Net Asset Value (VNAV)
 - * Other Money Market Funds – i.e. the investment is admitted to an official list maintained by a competent authority in an EEA State.
1. * *Investments in these instruments will be on advice from the Council’s treasury advisor.*

For credit rated counterparties, the minimum criteria will be the lowest equivalent short-term and long-term ratings assigned by Fitch, Moody’s and Standard & Poor’s (where assigned).

Long-term minimum: A+(Fitch); A1 (Moody’s); A+ (S&P)

Short-term minimum: F1 (Fitch); P-1 (Moody’s); A-1 (S&P)

The Council will also take into account information on corporate developments of and market sentiment towards investment counterparties.

New specified investments will be made within the following limits:

Instrument	Country/ Domicile	Counterparty	Maximum Counterparty Limits
Term Deposits	UK	DMADF, DMO	No limit
Term Deposits/Call Accounts	UK	Other UK Local Authorities	No limit
Term Deposits/Call Accounts	UK*	Counterparties rated at least A+ Long Term and F1 Short Term (or equivalent)	£10m
Term Deposits/Call Accounts	Non-UK*	Counterparties rated at least A+ Long Term and F1 Short Term (or equivalent) in select countries with a Sovereign Rating of at least AA+	£10m
Gilts	UK	DMO	No limit
T-Bills	UK	DMO	No limit
LA Bills	UK	Other UK Local Authorities	No limit
Bonds issued by multilateral development banks		(For example, European Investment Bank/Council of Europe, Inter American Development Bank)	£10m
AAA-rated Money Market Funds	UK/Ireland/ Luxembourg domiciled	CNAV MMFs VNAV MMFs (where there is greater than 12 month history of a consistent £1 Net Asset Value)	£10m
Other MMFs and CIS	UK/Ireland/ Luxembourg domiciled	Pooled funds which meet the definition of a Collective Investment Scheme per SI 2004 No 1010 (W.107) and SI 2007 No 1051 (W.108)	£10m

Non-UK Banks - These will be restricted to a maximum exposure of 25% per country.

MMFs - As far as is practicable, investments in Money Market Funds will be spread between two funds or more.

Individual Limits – Investments with individual counterparties will be limited to £10m

Group Limits - For institutions within a banking group, a limit of 1.5 times the individual limit of a single bank within that group will be applied.

Instrument	Country/ Domicile	Counterparty	Maximum Counterparty Limit	Maximum Group Limit
Term Deposits/ Call Accounts	UK	Santander UK Plc (Banco Santander Group)	£10m	£15m
Term Deposits/ Call Accounts	UK	Bank of Scotland (Lloyds Banking Group)	£10m	£15m
Term Deposits/ Call Accounts	UK	Lloyds TSB (Lloyds Banking Group)	£10m	£15m
Term Deposits/ Call Accounts	UK	Barclays Bank Plc	£10m	£15m
Term Deposits/ Call Accounts	UK	Clydesdale Bank (National Australia Bank Group)	£10m	£15m
Term Deposits/ Call Accounts	UK	HSBC Bank Plc	£10m	£15m
Term Deposits/ Call Accounts	UK	Nationwide Building Society	£10m	£15m
Term Deposits/ Call Accounts	UK	NatWest (RBS Group)	£10m	£15m
Term Deposits/ Call Accounts	UK	Royal Bank of Scotland (RBS Group)	£10m	£15m
Term Deposits/ Call Accounts	UK	Standard Chartered Bank	£10m	£15m
Term Deposits/ Call Accounts	Australia	Australia and NZ Banking Group	£10m	£15m
Term Deposits/ Call Accounts	Australia	Commonwealth Bank of Australia	£10m	£15m
Term Deposits/ Call Accounts	Australia	National Australia Bank Ltd (National Australia Bank Group)	£10m	£15m
Term Deposits/ Call Accounts	Australia	Westpac Banking Corp	£10m	£15m
Term Deposits/ Call Accounts	Canada	Bank of Montreal	£10m	£15m
Term Deposits/ Call Accounts	Canada	Bank of Nova Scotia	£10m	£15m
Term Deposits/ Call Accounts	Canada	Canadian Imperial Bank of Commerce	£10m	£15m
Term Deposits/ Call Accounts	Canada	Royal Bank of Canada	£10m	£15m
Term Deposits/ Call Accounts	Canada	Toronto-Dominion Bank	£10m	£15m
Term Deposits/ Call Accounts	Finland	Nordea Bank Finland	£10m	£15m
Term Deposits/ Call Accounts	France	BNP Paribas	£10m	£15m
Term Deposits/ Call Accounts	France	Credit Agricole CIB (Credit Agricole Group)	£10m	£15m

Term Deposits/ Call Accounts	France	Credit Agricole SA (Credit Agricole Group)	£10m	£15m
Term Deposits/ Call Accounts	France	Société Générale	£10m	£15m
Term Deposits/ Call Accounts	Germany	Deutsche Bank AG	£10m	£15m
Term Deposits/ Call Accounts	Netherlands	ING Bank NV	£10m	£15m
Term Deposits/ Call Accounts	Netherlands	Rabobank	£10m	£15m
Term Deposits/ Call Accounts	Sweden	Svenska Handelsbanken	£10m	£15m
Term Deposits/ Call Accounts	Switzerland	Credit Suisse	£10m	£15m
Term Deposits/ Call Accounts	US	JP Morgan	£10m	£15m

Non-Specified Investments determined for use by the Council

Having considered the rationale and risk associated with Non-Specified Investments, the following have been determined for the Council's use:

	In-house use	Maximum maturity	Max % of portfolio	Capital expenditure?
<ul style="list-style-type: none"> ▪ Deposits with banks and building societies ▪ CDs with banks and building societies 	✓	<u>5 years</u>	<u>50% in aggregate</u>	No
<ul style="list-style-type: none"> ▪ Gilts ▪ Bonds issued by multilateral development banks ▪ Bonds issued by financial institutions guaranteed by the UK government ▪ Sterling denominated bonds by non-UK sovereign governments 	✓ (on advice from treasury advisor)	<u>10 years</u>	<u>50% in aggregate</u>	No
Money Market Funds and Collective Investment Schemes, which are/are not credit rated	✓ (on advice from treasury advisor)	<u>These funds do not have a defined maturity date</u>	<u>50%</u>	No
Government guaranteed bonds and debt instruments issued by corporate bodies	✓	<u>10 years</u>	<u>£0M</u>	Yes
Non-guaranteed bonds and debt instruments issued by corporate bodies	✓	<u>10 years</u>	<u>£0M</u>	Yes
Pooled funds	✓ (on advice from treasury advisor)	<u>10 years</u>	<u>£0M</u>	Yes

1. In determining the period to maturity of an investment, the investment should be regarded as commencing on the date of the commitment of the investment rather than the date on which funds are paid over to the counterparty.