Report to Council

Treasury Management Strategy Statement 2024/25

Including the Annual Investment Strategy, Borrowing Strategy and Prudential Indicators

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Reason for Decision

To present to Council, the Treasury Management Strategy for 2024/25.

Executive Summary

The report outlines the Treasury Management Strategy for 2024/25, the Annual Investment Strategy, Borrowing Strategy and Prudential Indicators.

The Council is required through regulations supporting the Local Government Act 2003 to 'have regard to' the Prudential Code. It is required to produce an annual Treasury Strategy for borrowing and to prepare an Annual Investment Strategy setting out the Council's policies for managing its investments and for giving priority to security and liquidity of those investments.

The Strategy for 2024/25 covers.

- Economic Update
- Prospects for Interest Rates

- The Current Balance Sheet and Treasury Position
- Liability Benchmark
- The Borrowing Strategy
- Debt Rescheduling
- The Borrowing Strategy
- The Investment Strategy
- Approved Counterparties, risk management and Investment Limits
- Treasury Indicators which limit the treasury risk and activities of the Council

The report therefore outlines the implications and key factors in relation to each of the above Capital and Treasury Management issues and makes recommendations with regard to the Treasury Management Strategy for 2024/25.

The report includes the most recently available economic background commentary which reflects the position at December 2023.

The proposed Treasury Management Strategy was presented to the Audit Committee on 15 January and the Governance, Strategy and Resources Scrutiny Board on 25 January 2024 to enable scrutiny of the report before it's further consideration in the budget setting cycle. The report was considered at the Cabinet meeting on 12 February 2024. Cabinet was content to commend the report to Council.

Recommendation

That Council approves the:

1. Capital Financing Requirement (CFR) Projections as per paragraph 2.4.1;
2. Projected Balance Sheet position as at 31 March 2024 and future years as per paragraph 2.4.1;
3. Liability Benchmark as per section 2.5
4. Borrowing Strategy for 2024/25 as per section 2.6;
5. Annual Investment Strategy as per section 2.7 including counterparties and treasury limits
6. Treasury Management Prudential Indicators at section 2.8

Council **28 February 2024**

Treasury Management Strategy Statement 2024/25 Including the Borrowing Strategy, Annual Investment Strategy and Prudential Indicators

1. Background

1.1 Treasury management is the management of the Council's cash flows, borrowing and investments, and the associated risks. Oldham Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to the Council's prudent financial management.

1.2 Treasury risk management at the Council 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 Council to approve a treasury management strategy before the start of each financial year. This report fulfils the Council's legal obligation under the Local Government Act 2003 to have regard to the CIPFA Code.

1.3 Treasury management is defined as:

"The management of the local Council's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

Source: The Chartered Institute of Public Finance and Accountancy (CIPFA) Treasury Management in the Public Service's Code of Practice.

1.4 Investments held for service purposes or for commercial profit, although affect investment balances they are not treasury management investments and are therefore not considered in this report There is a separate Investment Strategy that covers these.

1.5 <u>Treasury Management Strategy for 2024/25</u>

1.5.1 The strategy for 2024/25 covers the below areas:

Treasury management issues:

- Economic Background & Interest Rate Forecasts
- The current and forecast balance sheet position;
- The Liability Benchmark
- The Borrowing Strategy;
- The policy on borrowing in advance of need;
- Debt rescheduling;
- The Investment Strategy;
- Approved Counterparties
- Treasury indicators which limit the treasury risk and activities of the Council;
- Treasury Related Matters

1.6 Training

1.6.1 The CIPFA Code requires the responsible officer (in Oldham the Director of Finance) to ensure that Members with responsibility for treasury management receive adequate training to enable them to discharge their duties. This especially applies to Members responsible for scrutiny.

1.6.2 The Council provided a training session for Audit Committee Members on 17 October 2023 which was led by an external trainer. To continue to ensure those responsible for scrutiny have received training, annual training will be arranged annually.

1.6.3 The training needs of treasury management officers are periodically reviewed. The team is staffed by professionally qualified accountants with extensive Local Government finance experience. Team members attend all relevant training courses, workshops and events to ensure that their knowledge and skills are up to date and the Council is in a position to address all new technical developments. During 2023/24 these have all been held remotely via zoom or another online platform. All staff follow a Continuous Professional Development (CPD) Plan as part of their individual accountancy body accreditation. The overall responsibility for capital and treasury activities lies with the Council's Section 151 Officer (Director of Finance) who, in accordance with statute, is professionally qualified and is suitably experienced to hold the post.

1.7 Treasury Management Consultants

1.7.1 The Council uses Arlingclose, as its external treasury management advisors.

1.7.2 The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of external service providers. All decisions will be undertaken with regard to all available information, including, but not solely, our treasury advisers.

1.7.3 It is also recognised that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review.

1.7.4 When looking at a commercial element within a particular capital scheme that has a main focus on public services, housing, regeneration, preventative objectives or treasury management investments, the Council may require specialist advice that Arlingclose may not provide. As part of the evaluation process and if required, appropriate external advice will be sought, and an extensive due diligence exercise will be undertaken.

2. External Context

2.1 Economic Background

2.1.1 The impact on the UK from higher interest rates and inflation, a weakening economic outlook, an uncertain political climate due to an upcoming general election, together with war in Ukraine and the Middle East, will be major influences on the Council's treasury management strategy for 2024/25.

2.1.2 The Bank of England (BoE) increased Bank Rate to 5.25% in August 2023, before maintaining this level for the rest of 2023. In December 2023, members of the BoE's

Monetary Policy Committee voted 6-3 in favour of keeping Bank Rate at 5.25%. The three dissenters wanted to increase rates by another 0.25%.

2.1.3 The November quarterly Monetary Policy Report (MPR) forecast a prolonged period of weak Gross Domestic Product (GDP) growth with the potential for a mild contraction due to ongoing weak economic activity. The outlook for CPI inflation was deemed to be highly uncertain, with upside risks. to CPI falling to the 2% target coming from potential energy price increases, strong domestic wage growth and persistence in price-setting.

2.1.4 Office for National Statistics (ONS) figures showed CPI inflation was 3.9% in November 2023, down from a 4.6% rate in the previous month and, in line with the recent trend, lower than expected. The core CPI inflation rate declined to 5.1% from the previous month's 5.7%, again lower than predictions. Looking ahead, using the interest rate path implied by financial markets the BoE expects CPI inflation to continue falling slowly, but taking until early 2025 to reach the 2% target before dropping below target during the second half 2025 and into 2026.

2.1.5 ONS figures showed the UK economy contracted by 0.1% between July and September 2023. The BoE forecasts GDP will likely stagnate through 2024. The BoE forecasts that higher interest rates will constrain GDP growth, which will remain weak over the entire forecast horizon

2.1.6 The labour market appears to be loosening, but only very slowly. The unemployment rate rose slightly to 4.2% between June and August 2023, from 4.0% in the previous 3-month period, but the lack of consistency in the data between the two periods made comparisons difficult. Earnings growth has remained strong but has showed some signs of easing; regular pay (excluding bonuses) was up 7.3% over the period and total pay (including bonuses) up 7.2%. Adjusted for inflation, regular pay was up 1.4% and total pay 1.3%. Looking forward, the MPR showed the unemployment rate is expected to be around 4.25% in the second half of calendar 2023, but then rising steadily over the forecast horizon to around 5% in late 2025/early 2026.

2.1.7 Having increased its key interest rate to a target range of 5.25-5.50% in August 2023, the US Federal Reserve appears now to have concluded the hiking cycle. It is likely this level represents the peak in US rates following a more dovish meeting outcome in December 2023. US GDP grew at an annualised rate of 4.9% between July and September 2023, ahead of expectations for a 4.3% expansion and the 2.1% reading for Q2. But the impact from higher rates has started to feed into economic activity and growth will weaken in 2024. Annual CPI inflation was 3.1% in November.

2.1.8 Eurozone inflation has declined steadily since the start of 2023, falling to an annual rate of 2.4% in November 2023. Economic growth has been weak, and GDP contracted by 0.1% in the three months to September 2023. In line with other central banks, the European Central Bank has increased rates, taking its deposit facility, fixed rate tender, and marginal lending rates to 3.75%, 4.25% and 4.50% respectively.

2.2 Credit Outlook

2.2.1 Credit Default Swap (CDS) prices were volatile during 2023, spiking in March on the back of banking sector contagion concerns following the major events of Silicon Valley Bank becoming insolvent and the takeover of Credit Suisse by UBS. After then falling back in Q2 of calendar 2023, in the second half of the year, higher interest rates and inflation, the ongoing war in Ukraine, and now the Middle East, have led to CDS prices increasing steadily.

2.2.2 On an annual basis, CDS price volatility has so far been lower in 2023 compared to 2022, but this year has seen more of a divergence in prices between ringfenced (retail) and non-ringfenced (investment) banking entities once again.

2.2.3 Moody's revised its outlook on the UK sovereign to stable from negative to reflect its view of restored political predictability following the volatility after the 2022 mini-budget. Moody's also affirmed the Aa3 rating in recognition of the UK's economic resilience and strong institutional framework.

2.2.4 Following its rating action on the UK sovereign, Moody's revised the outlook on five UK banks to stable from negative and then followed this by the same action on five rated local authorities. However, within the same update the long-term ratings of those five local authorities were downgraded.

2.2.5 There remain competing tensions in the banking sector, on one side from higher interest rates boosting net income and profitability against another of a weakening economic outlook and likely recessions that increase the possibility of a deterioration in the quality of banks' assets.

2.2.6 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.

2.3 Interest Rate Forecast

2.3.1 Although UK inflation and wage growth remain elevated, the Council's treasury management adviser Arlingclose forecasts that Bank Rate has peaked at 5.25%. The Bank of England's Monetary Policy Committee will start reducing rates in 2024 to stimulate the UK economy but will be reluctant to do so until it is sure there will be no lingering second-round effects. Arlingclose sees rate cuts from Q3 2024 to a low of around 3% by early-mid 2026.

2.3.2 Arlingclose expects long-term gilt yields to be broadly stable at current levels (amid continued volatility), following the decline in yields towards the end of 2023, which reflects the expected lower medium-term path for Bank Rate. Yields will remain relatively higher than in the past, due to quantitative tightening and significant bond supply. As ever, there will undoubtedly be short-term volatility due to economic and political uncertainty and events.

2.3.3 A more detailed economic and interest rate forecast provided by Arlingclose is in Appendix 1.

2.3.4 For the purpose of setting the budget, it has been assumed that new treasury investments will be made at an average rate/yield of 5%, and that new long-term loans will be borrowed at an average rate of 5%.

2.4 Local Context

2.4.1 On 14th February 2024, the Council held £170.996m of borrowing and £52.785m of treasury investments. This is set out in further detail at Appendix 2. Forecast changes in these sums are shown in the balance sheet analysis in table 1 below.

Table 1: Balance sheet summary and forecast

	31.3.23 Actual £'000	31.3.24 Estimate £'000	31.3.25 Estimate £'000	31.3.26 Estimate £'000	31.3.27 Estimate £'000
Capital financing requirement	465,723	490,527	516,878	541,308	539,625
Less: Other debt liabilities *	(204,339)	(193,752)	(182,387)	(170,308)	(158,384)
Loans CFR	**261,384**	**296,775**	**334,491**	**371,000**	**381,241**
Less: External borrowing **	(160,996)	(170,996)	(170,996)	(229,305)	(275,814)
Internal (over) borrowing	**100,388**	**125,779**	**163,495**	**141,694**	**105,427**
Less: Balance sheet resources	(171,168)	(165,898)	(105,186)	(95,186)	(85,186)
Treasury investments (or New borrowing requirement)	**70,780**	**40,119**	**(58,309)**	**(46,508)**	**(20,241)**

* leases and PFI liabilities that form part of the Council's total debt
** shows only loans to which the Council is committed and excludes optional refinancing

2.4.2 The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while balance sheet resources are the underlying sums available for investment. The Council's current strategy is to maintain borrowing and investments below their underlying levels, also known as internal borrowing.

2.4.3 The Council has an increasing CFR due to the capital programme and is forecasting a significant reduction in reserves and balances over the next three years. The consequence of this is that the Council moves from a position whereby it has funds available for investment to a position where it needs to borrow. The Council will be required to borrow up to £135m over the forecast period.

2.4.4 CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the Council's total debt should be lower than its highest forecast CFR over the next three years. Table 1 shows that the Council expects to comply with this recommendation during 2024/25.

2.5 Liability Benchmark

2.5.1 To compare the Council's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing. This assumes the same forecasts as table 1 above, but that cash and investment balances are kept to a minimum level of £20m at each year-end to maintain sufficient liquidity but minimise credit risk.

2.5.2 The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making.

2.5.3 The liability benchmark itself represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level required to manage day-to-day cash flow.

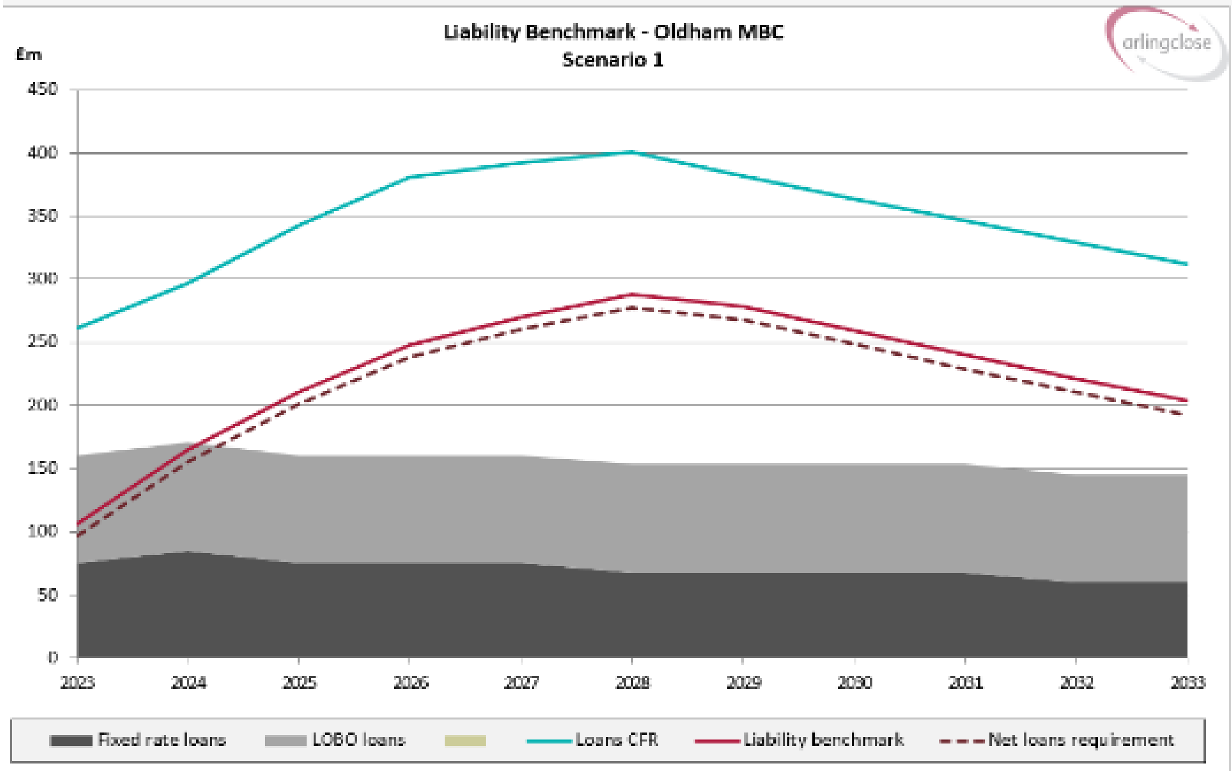
Table 2: Prudential Indicator: Liability benchmark

	31.3.23 Actual £'000	31.3.24 Estimate £'000	31.3.25 Estimate £'000	31.3.26 Estimate £'000	31.3.27 Estimate £'000
Loans CFR	261,384	296,775	334,491	371,000	381,241
Less: Balance sheet resources	(171,168)	(165,898)	(105,186)	(95,186)	(85,186)
Net loans requirement	**90,216**	**130,877**	**229,305**	**275,814**	**296,055**
Plus: Liquidity allowance	10,000	20,000	20,000	20,000	20,000
Liability benchmark	**100,216**	**150,877**	**249,305**	**295,814**	**316,055**

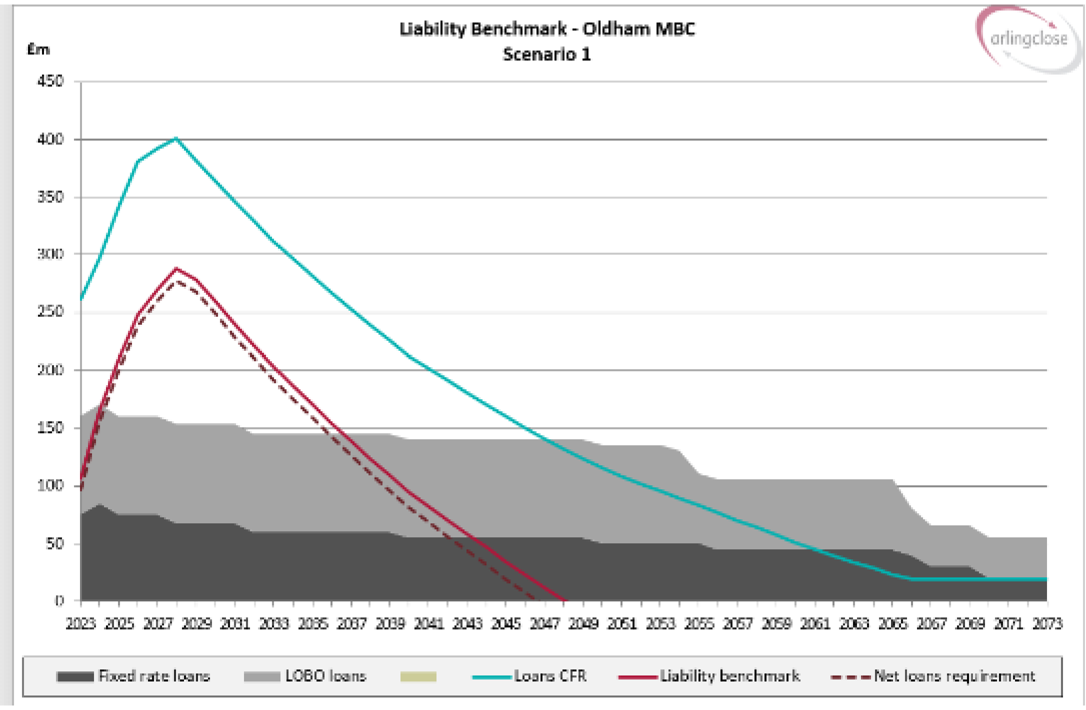
2.5.4 Following on from the medium-term forecasts in table 2 above, the long-term liability benchmark assumes capital expenditure funded by borrowing of £316m over the life of period 2024/25 to 2026/27, minimum revenue provision on new capital expenditure based on 5, 7, 10, 15, 25 and 40 year asset lives.

2.5.5 The Liability Benchmark is required to be reported for a minimum period of 10 years, however CIPFA recommend that the liability benchmark is for a much longer period and covers the existing debt portfolio. This is shown in the two charts below together with the maturity profile of the Council's existing borrowing over a 10-year period and 50-year period:

10 Year Liability Benchmark Projection



50 Year Liability Benchmark Period



2.5.6 The graphs above show the liability benchmark (the middle line red line) rising from a point below the shaded area that represents existing loans for the period to March 2024. When the middle line (liability benchmark) is above the shaded grey area this indicates a need for the Council to raise new long-term loans. The Liability Benchmark is effectively the Net Borrowing Requirement of a Local Council plus a liquidity allowance. In its simplest form, it is calculated by deducting the amount of investable resources available on the balance sheet (reserves and cash flow balances) from the amount of outstanding external debt and then adding the minimum level of investments required to manage day-to-day cash flow.

2.5.7 The greater the gap between the shaded area and the middle line (liability benchmark) the greater the amount of new long-term loans are required to fund the capital programme. It can be seen from the graph above that new loans are required up until the period 2045/46, with the maximum amount of new loans required peaking in 2027/28 and then gradually reduce up until 2045/46. This tool aids decision making on duration of new loans required. It should be noted that this analysis is based on the current 5-year capital programme: if the capital programme was extended then the borrowing duration will almost certainly increase.

2.5.8 Due to Oldham Council's existing loan portfolio being long dated maturity dates, the above chart shows that any new loans taken should be shorter dated than existing loans and staggered over the period from 2024/25 to 2045/46. The timing of any new borrowing has been factored into other performance indicators.

2.6 <u>Borrowing Strategy</u>

2.6.1 The Council currently holds £170.996 million of loans, £10m of temporary short-term borrowing has been undertaken for cash flow purposes over the year end period, no repayments have been made in this current financial year. These loans represent borrowings undertaken as part of its strategy for funding previous years' capital programmes. The balance sheet forecast in table 1 shows,- based on the current capital programme - that the Council is forecast to borrow up to £58.3m in 2024/25, a further £46.5m in 2025/26 and £20.2m in 206/27 bringing total new borrowing in the 3 year period to £135m if the capital programme progresses as forecast. The Council may also borrow additional sums to pre-fund future years' requirements, providing this does not exceed the authorised limit for borrowing of £312.5 million (see 2.8.13 below) and it is advantageous to do so in terms of reduced borrowing costs associated with borrowing early. A full appraisal will be carried out before any borrowing is undertaken.

2.6.2 The Council's chief objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The flexibility to renegotiate loans should the Council's long-term plans change is a secondary objective.

2.6.3 The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. Short-term interest rates are currently at a 15-year high but are expected to fall in the coming years and it is therefore likely to be more cost effective over the medium-term to either use internal resources, or to borrow short-term loans instead. This is a prudent approach based on the long-term loan requirement peaking in the next 5-10 years as shown in the liability benchmark at paragraph 2.5.5.

2.6.4 By doing so, the Council is able to reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk. The benefits of internal and short-term borrowing will be monitored regularly against the potential for incurring additional costs by deferring borrowing into future years when long-term borrowing rates are forecast to rise modestly. Arlingclose, Oldham Council's Treasury Management Advisor will assist with this 'cost of carry' and breakeven analysis. Its output may determine whether the Council borrows additional sums at long-term fixed rates in 2024/25 with a view to keeping future interest costs low, even if this causes additional cost in the short-term.

2.6.5 The Council has previously raised long-term borrowing from the PWLB and banks but will consider long-term loans from other sources including pension funds and other local authorities. It will also 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.

2.6.6 PWLB loans are no longer available to local authorities planning to buy investment assets primarily for investment yield purposes; the Council intends to avoid this activity in order to retain its access to PWLB loans.

2.6.7 The Council may also arrange forward starting loans, where the interest rate is fixed in advance, but the cash is received in later years. This would enable certainty of cost to be achieved without suffering a cost of carry in the intervening period.

2.6.8 In addition, the Council may borrow short-term loans to cover unplanned cash flow shortages.

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

- HM Treasury's PWLB lending facility (formerly the Public Works Loan Board)
- UK Infrastructure Bank Ltd
- any institution approved for investments (see below)
- any other bank or building society authorised to operate in the UK
- any other UK public sector body

- UK public and private sector pension funds (except Greater Manchester Pension Fund)
- capital market bond investors
- retail investor via a regulated peer to peer platform
- UK Municipal Bonds Agency plc and other special purpose companies created to enable local Council bond issues

2.6.10 Capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities.

- leasing
- hire purchase
- Private Finance Initiative (PFI)
- sale and leaseback

Oldham Council currently holds £203.826m of PFI debt over 7 schemes and £0.475m of finance leases.

2.6.11 The UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It issues bonds on the capital markets and lends the proceeds to local authorities. This is a more complicated source of finance than the PWLB for two reasons: borrowing authorities will be required to provide bond investors with a guarantee to refund their investment in the event that the agency is unable to for any reason; and there will be a lead time of several months between committing to borrow and knowing the interest rate payable. Any decision to borrow from the Agency will therefore be the subject of a separate report.

2.6.12 The Council holds £85.5m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Council has the option to either accept the new rate or to repay the loan at no additional cost. £44m of these LOBOs have options during 2024/25, and with interest rates having risen recently, lenders may seek to exercise their options. If they do, the Council will look to take the option to repay LOBO loans to reduce refinancing risk in later years, providing value for money can be obtained and generate a future saving. No further borrowing via LOBO loans is proposed for 2024/25.

2.6.13 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 interest rate exposure limits in the treasury management indicators below. Financial derivatives may be used to manage this interest rate risk (see section below).

Debt rescheduling

2.6.14 The PWLB allows authorities to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Other lenders may also be prepared to negotiate premature redemption terms. The Council may take advantage of this and replace some loans with new loans, or repay loans without replacement, where this is expected to lead to an overall cost saving or a reduction in risk.

2.6.15 The recent rise in interest rates means that more favourable debt rescheduling opportunities should arise than in previous years.

2.7 Treasury Investment Strategy

2.7.1 The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. In the past 12 months, the Council's treasury investment balance has ranged between £94.7million and £41.6 million. Reduced levels are expected in the forthcoming year as reserves are utilised and capital expenditure incurred in line with the approved capital programme.

2.7.2 The CIPFA Code requires the Council to invest its treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. This is referred to as the SLY model.

2.7.3 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 will aim 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.

2.7.4 The Council aims to be a responsible investor and will consider environmental, social and governance (ESG) issues when investing.

2.7.5 As demonstrated by the liability benchmark above, the Council expects to be a long-term borrower and new treasury investments will therefore be made primarily to manage day-to-day cash flows using short-term low risk instruments. The existing portfolio of strategic pooled funds will be maintained to diversify risk into different sectors and boost investment income.

2.7.6 The CIPFA Code does not permit local authorities to both borrow and invest long-term for cash flow management. But the Council may make long-term investments for treasury risk management purposes, including to manage interest rate risk by investing sums borrowed in advance for the capital programme for up to three years; to manage inflation risk by investing usable reserves in instruments whose value rises with inflation; and to manage price risk by adding diversification to the strategic pooled fund portfolio.

2.7.7 Environmental, social and governance (ESG) considerations are increasingly a factor in global investors' decision making, but the framework for evaluating investment opportunities is still developing and therefore the Council's ESG policy does not currently include ESG scoring or other real-time ESG criteria at an individual investment level. When investing in banks and funds, the Council will prioritise banks that are signatories to the UN Principles for Responsible Banking and funds operated by managers that are signatories to the UN Principles for Responsible Investment, the Net Zero Asset Managers Alliance and/or the UK Stewardship Code

2.7.8 Under the IFRS 9 standard, the accounting for certain investments depends on the Council's "business model" for managing them. The Council aims to achieve value from its treasury investments by a business model of collecting the contractual cash flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.

Approved counterparties

2.7.9 The Council may invest its surplus funds with any of the counterparty types in table 3 below, subject to the limits shown.

Table 3: Treasury investment counterparties and limits

Sector	Time limit	Counterparty limit	Sector limit
The UK Government	50 years	Unlimited	n/a
Local authorities & other government entities	3 years	£10m per local council /fire /police authority	Unlimited
Secured investments *	3 years	£10m	Unlimited
Banks (unsecured) *	13 months	£5m with the exception of the Council's banking provider (currently Barclays Bank) £10m	Unlimited
Building societies (unsecured) *	13 months	£5m	
Registered providers (unsecured) *	3 years	£5m	
Money market funds *	n/a	£15m per individual fund	Unlimited
Strategic pooled funds	n/a	£15m per individual fund	£20m
Other investments *	3 years	£10m	£10m

This table must be read in conjunction with the notes below

- **Minimum credit rating** Treasury investments in the sectors marked with an asterisk will only be made with entities whose lowest published long-term credit rating is no lower than A-. 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.
  For entities without published credit ratings, investments may be made either (a) where external advice indicates the entity to be of similar credit quality; or (b) to a maximum of £5 million per counterparty as part of a diversified pool e.g. via a peer-to-peer platform.

- **Government:** Loans to, and 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 generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.

- **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.

- **Banks and building societies (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.

- **Registered providers (unsecured):** Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government support if needed.

- **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. Although no sector limit applies to money market funds, the Council will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times.

- **Strategic pooled funds:** Bond, equity and property funds that 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.

- **Real estate investment trusts:** 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.

- **Other investments:** This category covers treasury investments not listed above, for example unsecured corporate bonds and company loans. Non-bank companies cannot be bailed-in but can become insolvent placing the Council's investment at risk.

<u>Risk assessment and credit ratings</u>

2.7.10 Credit ratings are obtained and monitored by the Council's treasury advisers, who will notify changes in ratings as they occur. The credit rating agencies in current use are listed in the

Treasury Management Practices document. 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 recalled or sold 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.

2.7.11 Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as “negative watch”) so that it may fall below the approved rating criteria, then only investments that can be withdrawn on the next working day 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.

2.7.12 The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential government support, reports in the quality financial press and analysis and advice from the Council’s treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.

2.7.13 The Council is aware that investment with certain counterparties, while considered secure from a purely financial perspective, may leave it open to criticism, valid or otherwise, that may affect its public reputation, and this risk will therefore be taken into account when making investment decisions.

2.7.14 When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008, 2020 and 2022, this is not generally reflected in credit ratings, but can be seen in other market measures. In these 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 cause investment returns to fall but will protect the principal sum invested.

<u>Investment limits</u>

2.7.15 The Council’s revenue reserves are forecast to be £90.6 million on 31st March 2024 and £75.6 million on 31st March 2025. In order that no more than 20% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £15 million. A group of entities under the same ownership will be treated as a single organisation for limit purposes. This limit will not be deemed to have been breached if the addition of interest or a re-invested dividend briefly takes the balance over £15million.

2.7.16 Limits are also 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.

Table 4: Additional investment limits

	Cash limit
Any group of pooled funds under the same management	£15m per manager
Negotiable instruments held in a broker's nominee account	£10m per broker
Foreign countries	£5m per country

Liquidity management:

2.7.17 The Council produces a cash flow forecast at the start of the year to determine the maximum period for which funds may prudently be invested, or to identify times and amounts which may need to be borrowed. This cash flow forecast is updated throughout the year. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Council's medium-term financial plan and cash flow forecast.

2.7.18 The Council will spread its liquid cash over at least two providers (e.g. bank accounts and money market funds) to ensure that access to cash is maintained in the event of operational difficulties at any one provider.

2.8 Treasury Management Prudential Indicators

2.8.1 The Council has adopted a number of voluntary measures in 2024/25 to manage its exposures to treasury management risks using the indicators detailed below.

Security

2.8.2 The Council has adopted the below measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. Arlingclose calculate and report this as part of the Investment Benchmarking service. Unrated investments are assigned a score based on their perceived risk.

Credit risk indicator	Target
Portfolio average credit rating	A

Liquidity

2.8.3 The Council has introduced an indicator for 2024/25 to measure 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.

Liquidity risk indicator	Target
Total cash available within 3 months	£20m

Interest rate exposures

2.8.4 This indicator is set to control the Council's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interest rates will be:

Interest rate risk indicator	Limit £'000
Upper limit on one-year revenue impact of a 1% rise in interest rates	597
Upper limit on one-year revenue impact of a 1% fall in interest rates	(597)

2.8.5 The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at new market rates. For the purpose of this indicator this has been based on LOBO's with option dates in 2024/25 and new borrowing associated with the capital programme.

Maturity structure of borrowing

2.8.6 This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of borrowing will be:

Interest rate risk indicator	Lower Limit	Upper Limit
Under 12 months	0%	30%
12 months and within 24 months	0%	30%
24 months and within 5 years	0%	30%
5 years and within 10 years	0%	30%
10 years and within 20 years	0%	60%
20 years and within 30 years	0%	60%
30 years and within 40 years	0%	60%
40 years and within 50 years	0%	60%
50 years and within 60 years	0%	60%

2.8.7 Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment. LOBO loans have been treated using the option date as there is a potential that they may be called, and repayment will be required.

Long-term treasury management investments

2.8.8 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 prudential limits on the long-term treasury management investments will be:

Price risk indicator	2024/25	2025/26	2026/27	No fixed date
Limit on principal invested beyond year end	£10m	£5m	£5m	£15m

2.8.9 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.

2.8.10 The Council is required to determine its Operational Boundary and Authorised Limit for external debt for the next three financial years.

Operational Boundary

2.8.11 The forecast Operational Boundary for 2023/24 together with the proposed operational boundaries for 2024/25 to 2026/27 are set out in the table below. The boundary reflects the maximum anticipated level of external debt which is not expected to be exceeded. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on levels of actual debt and the ability to fund under-borrowing by other cash resources. This boundary will be used as a management tool for ongoing monitoring of external debt and may be breached temporarily due to unusual cash flow movements. However, a sustained or regular trend above the Operational Boundary should trigger a review of both the Operational Boundary and the Authorised Limit.

Operational Boundary	2023/24 Forecast £'000	2024/25 Estimate £'000	2025/26 Estimate £'000	2026/27 Estimate £'000
Borrowing	297,500	335,250	372,000	382,000
Other long term liabilities	194,750	183,500	171,500	159,500
Total	**492,250**	**518,750**	**543,500**	**541,500**

Authorised Limit

2.8.12 A further key Prudential Indicator, the Authorised Limit controls the maximum level of borrowing. This represents a limit beyond which external debt is prohibited, and this limit may only be determined by full Council. It reflects the level of external debt which, while not desirable, is affordable in the short term, but is not sustainable in the longer term. This is the statutory limit determined under Section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all Councils' plans, or those of a specific Council, although this power has not yet been exercised.

2.8.13 Members are asked to consider the proposed Operational Boundary for each financial year from 2023/24 to 2026/27 as set out in the table above and Authorised Limit as set out in table below:

Authorised Limit	2023/24 Forecast £'000	2024/25 Estimate £'000	2025/26 Estimate £'000	2026/27 Estimate £'000
Borrowing	312,500	350,250	387,000	397,000
Other long term liabilities	197,250	186,000	174,000	162,000
Total	**509,750**	**536,250**	**561,000**	**559,000**

2.9 Related Matters

2.9.1 The CIPFA Code requires the Council to include the following in its treasury management strategy regarding financial derivatives.

2.9.2 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).

2.9.3 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.

2.9.4 Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria, assessed using the appropriate credit rating for derivative exposures. An allowance for credit risk calculated using the methodology in the Treasury Management Practices document will count against the counterparty credit limit and the relevant foreign country limit.

2.9.5 In line with the CIPFA Code, the Council will seek external advice and will consider that advice before entering into financial derivatives to ensure that it fully understands the implications.

Housing Revenue Account

2.9.6 On 1st April 2012, the HRA became self-financing, this meant for Oldham Council that all loans that formed part of the HRA capital financing requirement (CFR) were subsequently paid off by Government due to the Council notionally splitting each of its existing long-term loans into General Fund and HRA pools.

2.9.6 Any new long-term loans borrowed after this date will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g. premiums and discounts on early redemption) will be charged/ credited to the respective revenue account. Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative.

2.9.7 This balance will be measured annually, and interest transferred between the General Fund and HRA at an appropriate interest rate with respect to the balances held by the HRA.

Markets in Financial Instruments Directive (MIFID)

2.9.8 The Council has opted up to professional client status with its providers of financial services, including advisers, banks, brokers and money market funds allowing it access to a greater range of services but without the greater regulatory protections afforded to individuals and small companies. Given the size and range of the Council's treasury management activities, the Director of Finance believes this to be the most appropriate status.

3 Options/Alternatives

3.1 In order to comply with the CIPFA Code of Practice on Treasury Management, Council has no option other than to consider and approve the content of the report. Therefore, no options/alternatives have been presented.

4 Preferred Option

4.1 The preferred option is that the contents of this report are approved by Council.

5 Consultation

5.1 There has been consultation with Arlingclose, the Council's Treasury Management Advisors, the Audit Committee and the Governance, Strategy and Resources Scrutiny Board. Cabinet considered the report at its meeting of 12 February 2024 and was content to commend the report to Council.

6 Financial Implications

6.1 Financial Implications are detailed within the report.

7 Legal Services Comments

7.1 There are no legal implications.

8 Co-operative Agenda

8.1 The Treasury Management strategy embraces the Council's cooperative agenda. The Council will develop its investment framework to ensure it complements the co-operative ethos of the Council.

9 Human Resources Comments

9.1 There are no Human Resource Implications.

10 Risk Assessments

10.1 There are considerable risks to the security of the Council's resources if appropriate Treasury Management strategies and policies are not adopted and followed. The Council has established good practice in relation to Treasury Management which has previously been acknowledged in the Internal and External Auditors' reports presented to the Audit Committee. An issue dependent upon market developments which may need to be considered in the future is refinancing some of the long-term loans. This can be mitigated by effective monitoring of the market.

11 IT Implications

11.1 There are no IT Implications.

12 Property Implications

12.1 There are no Property Implications.

13 Procurement Implications

13.1 There are no Procurement Implications.

14 Environmental and Health & Safety Implications

14.1 There are no Environmental and Health & Safety Implications.

15 Community cohesion, including crime and disorder implications in accordance with section 17 of the Crime and Disorder Act 1998

15.1 There are no community cohesion, including crime and disorder crime implications.

16 Oldham Equality Impact Assessments, including implications for Children and Young People

16.1 No

17 Key Decision

17.1 N/A

18 Key Decision Reference

18.1 N/A

19 Background Papers

19.1 The following is a list of background papers on which this report is based in accordance with the requirements of Section 100(1) of the Local Government Act 1972. It does not include documents which would disclose exempt or confidential information as defined by the Act:

File Ref: Background papers are provided in Appendices 1 - 2
Officer Name: Talei Whitmore
Contact Email: talei.whitmore@oldham.gov.uk

20 Appendices

Appendix 1 Economic and Interest Rate Forecast
Appendix 2 Existing Investment and Debt Portfolio

Appendix 1 – Arlingclose Economic and Interest Rate Forecast – December 2023

Underlying assumptions:

- UK inflation and wage growth remain elevated but have eased over the past two months fuelling rate cuts expectations. Near-term rate cuts remain unlikely, although downside risks will increase as the UK economy likely slides into recession.
- The MPC's message remains unchanged as the Committee seeks to maintain tighter financial conditions. Monetary policy will remain tight as inflation is expected to moderate to target slowly, although some wage and inflation measures are below the Bank's last forecasts.
- Despite some deterioration in activity data, the UK economy remains resilient in the face of tighter monetary policy. Recent data has been soft but mixed; the more timely PMI figures suggest that the services sector is recovering from a weak Q3. Tighter policy will however bear down on domestic and external activity as interest rates bite.
- Employment demand is easing. Anecdotal evidence suggests slowing recruitment and pay growth, and we expect unemployment to rise further. As unemployment rises and interest rates remain high, consumer sentiment will deteriorate. Household and business spending will therefore be weak.
- Inflation will fall over the next 12 months. The path to the target will not be smooth, with higher energy prices and base effects interrupting the downtrend at times. The MPC's attention will remain on underlying inflation measures and wage data. We believe policy rates will remain at the peak for another 10 months, or until the MPC is comfortable the risk of further 'second-round' effects has diminished.
- Maintaining monetary policy in restrictive territory for so long, when the economy is already struggling, will require significant loosening in the future to boost activity.
- Global bond yields will remain volatile. Markets are currently running with expectations of near-term US rate cuts, fuelled somewhat unexpectedly by US policymakers themselves. Term premia and bond yields have experienced a marked decline. It would not be a surprise to see a reversal if data points do not support the narrative, but the current 10-year yield appears broadly reflective of a lower medium- term level for Bank Rate.
- There is a heightened risk of fiscal policy and/or geo-political events causing substantial volatility in yields.

Forecast:

- The MPC held Bank Rate at 5.25% in December. We believe this is the peak for Bank Rate.
- The MPC will cut rates in the medium term to stimulate the UK economy but will be reluctant to do so until it is sure there will be no lingering second-round effects. We see rate cuts from Q3 2024 to a low of around 3% by early-mid 2026.
- The immediate risks around Bank Rate have become more balanced, due to the weakening UK economy and dampening effects on inflation. This shifts to the downside in the short term as the economy weakens.
- Long-term gilt yields are now substantially lower. Arlingclose expects yields to be flat from here over the short-term reflecting medium term Bank Rate forecasts. Periodic volatility is likely.

	Current	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26
Official Bank Rate													
Upside risk	0.00	0.00	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.75	0.75	1.00	1.00
Central Case	5.25	5.25	5.25	5.25	5.00	4.75	4.25	4.00	3.75	3.50	3.25	3.00	3.00
Downside risk	0.00	0.00	-0.25	-0.50	-0.75	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00
3-month money market rate													
Upside risk	0.00	0.00	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.75	0.75	1.00	1.00
Central Case	5.40	5.40	5.40	5.30	5.15	4.80	4.30	4.10	3.80	3.50	3.25	3.05	3.05
Downside risk	0.00	0.00	-0.25	-0.50	-0.75	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00
5yr gilt yield													
Upside risk	0.00	0.25	0.75	0.85	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	3.77	3.75	3.75	3.75	3.70	3.60	3.50	3.50	3.40	3.30	3.30	3.30	3.35
Downside risk	0.00	-0.25	-0.75	-0.85	-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	0.25	0.75	0.85	0.85	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	3.72	3.75	3.80	3.80	3.80	3.80	3.80	3.80	3.75	3.65	3.60	3.65	3.70
Downside risk	0.00	-0.25	-0.75	-0.85	-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	0.25	0.75	0.85	0.85	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	4.16	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.25
Downside risk	0.00	-0.25	-0.75	-0.85	-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	0.25	0.75	0.85	0.85	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	3.76	3.80	3.85	3.90	3.90	3.90	3.90	3.90	3.90	3.90	3.95	3.95	3.95
Downside risk	0.00	-0.25	-0.75	-0.85	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00

PWLB Standard Rate = Gilt yield + 1.00%
PWLB Certainty Rate = Gilt yield + 0.80%
PWLB HRA Rate = Gilt yield + 0.40%
UK Infrastructure Bank Rate = Gilt yield + 0.40%

Appendix 2 Existing Investment and Debt Portfolio

The Council's current external borrowing, long term liabilities and investments are detailed in the table below.

	31/12/2023 Actual Portfolio £'000	31/12/2023 Average Rate %
External borrowing:		
Public Works Loan Board	35,241	2.81%
LOBO loans from banks	85,500	4.33%
Other Bank loans	40,000	4.03%
Other Loans	255	4.00%
Temporary Short Term	10,000	5.80%
Total external borrowing	**170,996**	
Other long-term liabilities:		
Private Finance Initiative	203,826	7.98%
Leases	475	5.10%
Transferred Debt	33	2.82%
Total other long-term liabilities	**204,334**	
Total gross external debt	**375,330**	
Treasury investments:		
Local authorities	18,000	5.56%
Money market funds	21,190	5.30%
Strategic pooled funds - CCLA Property	13,595	4.50%
Total treasury investments	**52,785**	
Net debt	**322,545**	