

**DECISION NUMBER: PCCG-2019-002**

**OFFICE OF POLICE AND CRIME COMMISSIONER**

**TITLE: OPCC Treasury Management Strategy 2019/20 to 2021/22**


**DATE: 13<sup>th</sup> December 2018**

**TIMING: This decision needs to be taken before the Revenue Budget for 2019/20 is formally approved**

**PURPOSE: For Approval**

<b>1.</b>	<b><u>RECOMMENDATION</u></b> That the Police and Crime Commissioner (Commissioner) approves: (i) The Treasury Management Strategy for 2019/20 to 2021/22 set out in Appendix A; and (ii) The twelve Treasury Management Practices set out in Appendix B.
<b>2.</b>	<b><u>INTRODUCTION &amp; BACKGROUND</u></b> Treasury Management covers borrowing, investing, banking and cash flow management. This report fulfils four key annual legislative requirements: (i) The setting of the Prudential Indicators relating to Capital Expenditure; (ii) The Minimum Revenue Provision Policy; (iii) The Treasury Management Strategy; and (iv) The Investment Strategy in accordance with the Welsh Government's Guidance on Local Government Investments. The report also seeks approval for twelve Treasury Management Practices.
<b>3.</b>	<b><u>ISSUES FOR CONSIDERATION</u></b> The Commissioner is required to adopt and comply with the CIPFA Prudential Code for Capital Finance in Local Authorities (2011 (as revised)) and the CIPFA Code of Practice on Treasury Management (2011 (as revised)). The Treasury Management Strategy 2019/20 to 2021/22 (Appendix A) and the Treasury Management Practices (Appendix B) are submitted for approval in compliance with the Codes.  The Treasury Management Strategy was considered and commented upon by the Joint Audit Committee at their meeting on 13 <sup>th</sup> December 2018.
<b>4.</b>	<b><u>NEXT STEPS</u></b> The Capital Prudential Indicators demonstrate that the Capital Programme is affordable, prudent and sustainable and it is essential that the Commissioner is satisfied of this situation prior to formally setting the Budget and Council Tax Precept for 2019/20.
<b>5.</b>	<b><u>FINANCIAL CONSIDERATIONS</u></b> This is a financial report required prior to setting the budget and council tax precept for 2019/20.

6.	<p><b><u>PERSONNEL CONSIDERATIONS</u></b>  There are no additional staff requirements stemming from this report.</p>
7.	<p><b><u>LEGAL IMPLICATIONS</u></b>  Approval of the Treasury Management Strategy by the Commissioner is a statutory responsibility.</p>
8.	<p><b><u>EQUALITIES AND HUMAN RIGHTS CONSIDERATIONS</u></b>  This report has been considered against the general duty to promote equality, as stipulated under the Strategic Equality Plan and has been assessed not to discriminate against any particular group.</p> <p>Consideration has been given to requirements of the Articles contained in the European Convention on Human Rights and the Human Rights Act 1998 in preparing this report.</p>
9.	<p><b><u>RISK</u></b>  Treasury Management can never be risk free. In borrowing, the risk is that interest payable might be higher than necessary and in lending there is the risk of default on repayment and the risk that a better rate of return could have been achieved. Adherence to the CIPFA Code of Practice on Treasury Management is best practice in terms of balancing risk and return.</p>
10.	<p><b><u>PUBLIC INTEREST</u></b>  Once approved the Treasury Management Strategy will be published on the Commissioner's website.</p>
11.	<p><b><u>CONTACT OFFICER</u></b>  Darren Garwood-Pask, Chief Finance Officer (Section 151 Officer) to the Commissioner.</p>
12.	<p><b><u>ANNEXES</u></b>  The Appendices to this report provides more details on the proposal.</p>

<b>Mr Jeff Cuthbert, Police and Crime Commissioner for Gwent</b>	
My decision is as I have recorded in this paper	
Signed 	Date 21/1/19

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<b>Background papers</b>	Treasury Management Strategy 2019/20 to 2021/22



**OFFICE OF THE POLICE AND CRIME COMMISSIONER FOR GWENT**

**Treasury Management Strategy 2019/20 to 2021/22**

**1 INTRODUCTION**

- 1.1** Treasury Management is the management of cash flows, banking, money market and capital market transactions; the management of the associated risks, and the pursuit of the optimum performance or return consistent with those risks. The treasury management service is an important part of the overall financial management of the Police and Crime Commissioner's (Commissioner) affairs. The Commissioner is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Commissioner's low risk appetite, providing adequate liquidity initially, before considering investment return. The second main function of the treasury management service is the funding of the Commissioner's capital plans. These capital plans provide a guide to the borrowing need of the Commissioner, essentially the longer term cash flow planning to ensure that the Commissioner can meet his capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion, any debt previously drawn may be restructured to meet the Commissioner's risk or cost objectives.
- 1.2** The Commissioner's treasury activities are strictly regulated by statutory requirements and a professional code of practice, the CIPFA Code of Practice on Treasury Management. Under the Code, the Commissioner is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.
- 1.3** The Prudential Code 2017 introduced a new requirement for local authorities (including Commissioners) to produce an annual capital strategy. It is for local authorities to decide whether to include their treasury management strategy and annual investment strategy as part of a capital strategy or to complete separately. In the first year of operation, the Commissioner has elected to complete a separate capital strategy which will be completed at the conclusion of the budget setting process in February 2019 and approved before the commencement of the 2019/20 financial year.
- 1.4** The adoption of a Treasury Management Strategy for 2019/20, prior to the start of the financial year, is the first of the three reporting requirements in

respect of that year. This will be followed in due course by a mid-year Treasury Management report and an Annual Treasury Report before 30<sup>th</sup> September 2019, providing a selection of actual prudential and treasury indicators.

**1.5 The Treasury Management Strategy for 2019/20 covers two main areas:**

**Capital Issues**

- (i) The capital plans and the prudential indicators; and
- (ii) The Minimum Revenue Provision (MRP) strategy.

**Treasury Management Issues**

- (i) Debt and investment projections;
- (ii) Limits on borrowing activity;
- (iii) The expected movement in interest rates;
- (iv) Borrowing and investment strategies;
- (v) Treasury performance indicators; and
- (vi) Specific limits on treasury activities.

**2. CAPITAL PRUDENTIAL INDICATORS 2019/20 to 2021/22**

**2.1** The Local Government Act 2003 requires the Commissioner to adopt the CIPFA Prudential Code, which was updated in 2017, and produce prudential indicators. Each indicator either summarises the expected capital activity or introduces limits upon that activity, and reflects the outcome of the underlying capital appraisal systems. This document updates currently approved indicators and introduces new indicators for 2021/22.

**2.2** Within this overall prudential framework there is an impact on the Commissioner's treasury management activity, as it will directly impact on borrowing or investment activity.

**2.3 Capital Expenditure Plans**

**2.3.1** The capital expenditure plans are summarised below and this forms the first of the prudential indicators. A certain level of capital expenditure is grant supported by the Government; any decisions by the Commissioner to spend above this level will be considered unsupported capital expenditure.

**2.3.2** This unsupported capital expenditure needs to have regard to:

- (i) Service objectives (e.g. strategic planning);
- (ii) Stewardship of assets (e.g. asset management planning);
- (iii) Value for money (e.g. option appraisal);
- (iv) Prudence and sustainability (e.g. implications for external borrowing and whole life costing);
- (v) Affordability (e.g. implications for the council tax); and
- (vi) Practicality (e.g. the achievability of longer term plans).

- 2.3.3 The revenue consequences of capital expenditure, particularly the supported capital expenditure, will need to be paid for from the Commissioner's own resources.
- 2.3.4 This capital expenditure can be paid for immediately (by applying capital resources such as capital receipts, capital grants, earmarked reserves (known as committed funds) or revenue resources), but if these resources are insufficient any residual capital expenditure will add to the Commissioner's borrowing need.
- 2.3.5 A key risk to the plans, are that the level of Government support has been estimated and could therefore be subject to change.
- 2.3.6 The Commissioner is asked to approve the following summary capital expenditure projections which is the first prudential indicator:

First Prudential Indicator - Estimates of Capital Expenditure					
	2018/19 Original £000's	2018/19 Revised £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
<b>Capital Expenditure</b>	<b>23,269</b>	<b>8,053</b>	<b>29,117</b>	<b>28,241</b>	<b>18,612</b>
Financed by:					
Capital Receipts	0	655	0	0	0
Capital Grants and PIF Grants	449	449	449	449	449
Reserves	22,245	4,374	27,093	13,865	0
Revenue	575	2,575	1,575	2,575	2,575
<b>Net Financing Need for the Year</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>11,352</b>	<b>15,588</b>

- 2.3.7 The above financing need excludes other long term liabilities, such as Private Finance Initiative (PFI) and leasing arrangements which already include borrowing instruments. The table above identifies the financial requirements for the delivery of the Commissioner's Estate Strategy, which includes the investment in a new Headquarters and the transformation of operational policing presence into a 'Hub and Spoke' model, resulting in a borrowing need from 2020/21 onwards. Prior to 2020/21, the Capital Programme will continue to be funded from a combination of capital grant, revenue contributions to capital, capital receipts and committed funds.
- 2.4 **The Commissioner's Borrowing Need (the Capital Financing Requirement)**
- 2.4.1 The second prudential indicator is the Commissioner's Capital Financing Requirement (CFR) which is simply the total outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is a measure of the Commissioner's underlying borrowing

need. Any capital expenditure in the table in paragraph 2.3.6 above which has not immediately been paid for will increase the CFR.

2.4.2 The CFR includes any other long term liabilities (e.g. PFI schemes) brought onto the balance sheet. Whilst this increases the CFR, and therefore the Commissioner's borrowing requirement, these types of scheme include a borrowing facility and so the Commissioner is not required to borrow separately for this scheme. As at 31<sup>st</sup> March 2018 the Commissioner had £4.686m of such schemes within the CFR.

2.4.3 The Commissioner is asked to approve the CFR projections below:

Second Prudential Indicator - the Capital Financing Requirement (CFR)					
	2018/19 Original £000's	2018/19 Estimate £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
Opening CFR	4,684	4,686	4,511	0	10,898
Capital Spend	23,269	8,053	29,117	28,241	18,612
Movement in finance lease liability	(4,684)	(175)	(4,511)	0	0
Resources Used	(23,269)	(8,053)	(29,117)	(16,889)	(3,024)
MRP		0	0	(454)	(1,078)
<b>Closing CFR</b>	<b>0</b>	<b>4,511</b>	<b>0</b>	<b>10,898</b>	<b>25,408</b>

2.4.4 The CFR projections above assume the early repayment of the Commissioner's PFI in 2019/20. Although the Commissioner will not be required to make a MRP until 2020/21, he will still require a policy on this matter as per section 3 below.

### 3. MINIMUM REVENUE PROVISION POLICY

3.1 The Commissioner is required to recognise an element of outstanding capital borrowing each year through a revenue charge known as the MRP. The MRP is calculated to match the repayment of borrowing over the life of the assets, for which debt has been raised. It is also permissible to pay an additional amount known as a Voluntary Revenue Provision (VRP). Under Welsh Government (WG) Regulations the Commissioner has to approve an MRP Statement in advance of each year. The Commissioner is recommended to adopt the following MRP policy for 2019/20:

- (i) For all capital expenditure incurred before 1<sup>st</sup> April 2008 and all supported capital expenditure incurred since that date or in the future, the MRP policy will be 4% of the CFR. This is consistent with the practice in place prior to the current regulations; and
- (ii) For all unsupported borrowing since 1<sup>st</sup> April 2008 and in the future, the asset life method will be used, i.e., the amount borrowed will be divided by the life of the asset.



#### 4. THE USE OF THE COMMISSIONER'S RESOURCES AND INVESTMENT POSITION

- 4.1 The application of resources (capital receipts, committed funds, etc.) will have an on-going impact on investments. Detailed below are estimates of the year-end balances for each resource and anticipated day to day cash flow balances.

Investment Position - Year end Resources					
	2018/19 Original £000's	2018/19 Revised £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
Police Fund	9,000	4,000	4,000	4,000	4,000
Committed Funds	15,358	48,480	18,649	0	0
Provisions	1,585	1,594	1,594	1,594	1,594
Total Core Funds	25,943	54,074	24,243	5,594	5,594
Working Capital	6,773	6,429	6,429	6,429	6,429
Expected Investments	32,716	60,503	30,672	12,023	12,023

\*Working capital balances shown are estimated year end; these may be higher mid-year.

#### 5. AFFORDABILITY PRUDENTIAL INDICATORS

- 5.1 The previous sections cover the overall capital and control of borrowing prudential indicators. Prudential indicators are also required to assess the affordability of the capital investment plans. The Commissioner is asked to approve the third and fourth prudential indicators, which assess affordability in terms of the impact of the capital investment plans on the Commissioner's overall finances.
- 5.2 The third prudential indicator is the ratio of net financing costs (financing income less finance interest expense) to net revenue stream. This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream.

Third Prudential Indicator - Ratio of Financing Costs to Net Revenue Stream					
	2018/19 Original %	2018/19 Revised %	2019/20 Estimate %	2020/21 Estimate %	2021/22 Estimate %
Ratio	-0.18%	-0.32%	-0.24%	0.52%	1.42%

- 5.3 The estimates of financing costs include current commitments and the proposals in the budget report. The ratio turns positive in 2020/21 as interest expense will be payable on newly borrowed debt, at this point forecast interest expense will be greater than interest income.

- 5.4 The fourth prudential indicator identifies the increased revenue costs associated with the approved three year Capital Programme and expresses these in terms of the increase in Band D council tax. The assumptions are based on the budget, but will invariably include some estimates, such as the level of Government support, which is not published over a three year period.

Fourth Prudential Indicator - Incremental Increase in Council Tax Precept			
	2019/20 Estimate £	2020/21 Estimate £	2021/22 Estimate £
<b>Ratio</b>	0.81	4.05	8.54

## 6. BORROWING

- 6.1 The capital expenditure plans are set out in Section 2.3.6. The treasury management function ensures that the cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet the capital expenditure requirements. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury prudential indicators, the current and projected debt positions and the annual investment strategy.

### 6.2 Current portfolio position

The treasury portfolio position at 1<sup>st</sup> April 2018, with forward projections, are summarised below. The table shows the actual external debt (the treasury management operations), against the underlying capital borrowing need (the CFR), highlighting any over or under borrowing.

Borrowing Position					
	2018/19 Original £000's	2018/19 Revised £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
<b>External Debt</b>					
Debt at 1st April		0	0	0	11,352
Expected Change in Debt		0	0	11,352	15,588
<b>Other Long Term Liabilities (Finance Lease Liability - PFI) at 1st April</b>	4,686	4,686	4,511	0	0
Expected Change in OLTL	(175)	(175)	(4,511)	0	0
<b>Gross Debt at 31st March</b>	<b>4,511</b>	<b>4,511</b>	<b>0</b>	<b>11,352</b>	<b>26,940</b>
Capital Financing Requirement at 31st March	4,511	4,511	0	10,898	25,408
<b>Under/(Over) Borrowing</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(454)</b>	<b>(1,532)</b>

- 6.3 The related impact of the above movements on the revenue budget is shown below:

Impact on Revenue Budgets					
Revenue Budget Heading	2018/19 Original £000's	2018/19 Revised £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
Interest on Borrowing	0	0	0	352	835
Investment Income	(224)	(399)	(301)	(141)	(79)
<b>Net Police Fund Borrowing Cost</b>	<b>(224)</b>	<b>(399)</b>	<b>(301)</b>	<b>211</b>	<b>756</b>

## 7. LIMITS ON BORROWING ACTIVITY

- 7.1 Within the prudential indicators there are a number of key indicators to ensure that the Commissioner operates activities within well-defined limits. For the first of these the Commissioner needs to ensure that gross debt does not, except in the short term, exceed the total of the CFR in the preceding year, plus the estimates of any additional CFR for 2019/20 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes. The following table is relevant for this indicator.

Limits on Borrowing Activity - Year End Position					
	2018/19 Original £000's	2018/19 Revised £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
Gross Debt	0	0	0	11,352	26,940
Investments	(32,716)	(60,503)	(30,672)	(12,023)	(12,023)
Net Borrowing	(32,716)	(60,503)	(30,672)	(671)	14,917
Capital Financing Requirement	4,686	4,511	0	10,898	25,408
Gross Debt <= CFR	Yes	Yes	Yes	No	No

- 7.2 The next key indicator is the operational boundary. This is the limit beyond which external debt is not normally expected to exceed.

Operational Boundary for Debt at 1st April					
	2018/19 Original £000's	2018/19 Revised £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
Debt	0	0	0	11,352	26,940
Other Long Term Liabilities	4,686	4,686	4,511	0	0
<b>Net Borrowing</b>	<b>4,686</b>	<b>4,686</b>	<b>4,511</b>	<b>11,352</b>	<b>26,940</b>

- 7.3 A further key prudential indicator representing a control on the overall level of borrowing is the Authorised Limit for External Debt. This is calculated on a 5% mark up on the operational boundary. This represents a limit beyond which external debt is prohibited and this limit needs to be set or revised by the Commissioner. It reflects the level of external debt which, while not desired, could be afforded 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 plans of all Local Authorities and Commissioners, or those of a specific Authority or Commissioner, although no control has yet been exercised. The Commissioner is asked to approve the following Authorised Limit:

Authorised Limit for Debt at 1st April					
	2018/19 Original £000's	2018/19 Revised £000's	2019/20 Estimate £000's	2020/21 Estimate £000's	2021/22 Estimate £000's
Debt	0	0	0	11,920	28,287
Other Long Term Liabilities	4,686	4,686	4,511	0	0
Working Capital Requirement	6,773	6,429	6,429	6,429	6,429
<b>Authorised Limit</b>	<b>11,459</b>	<b>11,115</b>	<b>10,940</b>	<b>18,349</b>	<b>34,716</b>

- 7.4 Risks associated with any advance borrowing activity will be subject to appraisal in advance and subsequent reporting through the mid-year or annual reporting mechanism.

## 8. PROSPECTS FOR INTEREST RATES

- 8.1 The Commissioner uses Link Asset Services (previously known as Capita Asset Services) as treasury management advisors and part of their service is to provide a view on the prospects for interest rates and economic

growth. The following table gives the Link Asset Services central view on the prospects for interest rates.

	Dec-18	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22
Bank Rate View	0.75%	0.75%	1.00%	1.00%	1.00%	1.00%	1.25%	1.25%	1.50%	1.50%	1.50%	1.75%	1.75%	2.00%
3 Month LIBID	0.50%	0.50%	0.50%	1.10%	1.10%	1.20%	1.40%	1.50%	1.50%	1.50%	1.70%	1.80%	1.90%	2.00%
6 Month LIBID	0.50%	0.50%	1.00%	1.20%	1.30%	1.30%	1.50%	1.60%	1.70%	1.70%	1.80%	1.90%	2.00%	2.10%
12 Month LIBID	1.00%	1.00%	1.10%	1.30%	1.30%	1.40%	1.60%	1.70%	1.80%	1.80%	1.90%	2.00%	2.10%	2.20%
1Yr PWLB Rate	2.00%	2.10%	2.20%	2.20%	2.30%	2.30%	2.40%	2.50%	2.60%	2.60%	2.60%	2.70%	2.70%	2.80%
2Yr PWLB Rate	2.50%	2.50%	2.60%	2.70%	2.70%	2.80%	2.90%	2.90%	3.00%	3.10%	3.10%	3.20%	3.20%	3.30%
3Yr PWLB Rate	2.90%	3.00%	3.00%	3.10%	3.20%	3.20%	3.30%	3.40%	3.50%	3.50%	3.50%	3.60%	3.60%	3.70%
5Yr PWLB Rate	2.70%	2.80%	2.80%	2.90%	3.00%	3.00%	3.10%	3.20%	3.30%	3.30%	3.40%	3.40%	3.40%	3.50%

- 8.2 The Monetary Policy Committee (MPC) delivered a 0.25% increase in Bank Rate at its meeting on 2<sup>nd</sup> August 2018 from 0.5% to 0.75%. However, the MPC emphasised again, that future Bank Rate increases would be gradual and it is unlikely that the MPC will increase the bank rate in February 2019. The Link Asset Services forecast as above, includes increases in the Bank Rate of 0.25% in June 2019, June 2020 and Dec 2020 to reach 1.5%. The gradual increase of the interest rates is dependent on a reasonably ordered Brexit.
- 8.3 Economic and interest rate forecasting remains difficult with so many external influences weighing on the UK. The above forecasts (and MPC decisions) will be liable to further amendment depending on how economic data and developments in financial markets transpire over the next year. Geopolitical developments, especially in the European Union (EU), could also have a major impact. Forecasts for average investment earnings beyond the three-year time horizon will be heavily dependent on economic and political developments.
- 8.4 The overall longer run trend is for gilt yields and Public Works Loan Board (PWLB) rates to rise, albeit gently. It has long been expected, that at some point, there would be a more protracted move from bonds to equities after a historic long-term trend, over about the last 25 years of falling bond yields. The action of central banks since the financial crash of 2008, in implementing substantial Quantitative Easing, added further impetus to this downward trend in bond yields and rising bond prices. The sharp rise in bond yields since the US Presidential election in November 2016 has called into question whether the previous trend may go into reverse, especially with yields rising further as a result of a big increase in the US Government deficit aimed at stimulating economic growth, but has created concerns around significant increases in inflation. The Federal Reserve has tried to combat its perception of rising inflation by repeatedly increasing the Federal rate to reach 2.00% - 2.25% in September 2018 and has continued its policy of not fully reinvesting proceeds from bonds

that it holds when they mature. This caused 10 year bond treasury yields to rise above 3.2% during October 2018 and has also seen investors causing a sharp fall in equity prices as they sold out of holding riskier assets.

**8.5** The overall balance of risks to economic recovery in the UK is probably to the downside, particularly with the current level of uncertainty over the final terms of Brexit. From a global perspective growth has been doing reasonably well but the expected downturn in the US and the weakening economic activity in China is likely to weaken world growth.

**8.6** Downside risks to current forecasts for UK gilt yields and PwLB rates currently include:

- Bank of England monetary policy takes action too quickly, or too far over the next three years to raise the Bank Rate and causes UK economic growth and increases in inflation, to be weaker than we currently anticipate;
- Geopolitical risks, especially North Korea, but also in Europe and the Middle East, which could lead to increasing safe haven flows;
- A resurgence of the Eurozone sovereign debt crisis, possibly Italy, due to its high level of government debt, low rate of economic growth and vulnerable banking system. The EU has rejected the proposed Italian budget and has demanded cuts in government spending which the Italian Government has refused. Rating agencies have downgraded Italian debt to one notch above junk level;
- If there is a disorderly Brexit which causes significant economic disruption and a major downturn in the growth rate;
- Weak capitalisation of some European banks. Italian banks are particularly vulnerable;
- German minority government - In the German general election of September 2017, Angela Merkel's CDU party was left in a vulnerable minority position dependent on the fractious support of the SPD party, as a result of the rise in popularity of the anti-immigration AfD party. Then in October 2018, the results of the Bavarian and Hesse state elections radically undermined the SPD party and showed a sharp fall in support for the CDU. As a result, the SPD is reviewing whether it can continue to support a coalition that is so damaging to its electoral popularity. After the result of the Hesse state election, Angela Merkel announced that she would not stand for re-election as CDU party leader at her party's convention in December 2018. However, this makes little practical difference as she is still expected to aim to continue for now as the Chancellor. Furthermore, there are five more state elections coming up in 2019 and EU parliamentary elections in May/June; these could result in a further loss of electoral support for both the CDU and SPD which could also undermine her leadership;

- Further increases in interest rates in the US could spark a sudden flight of investment funds from more risky assets e.g. shares, into bonds yielding a much improved yield;
- Austria, the Czech Republic and Hungary now form a strongly anti-immigration bloc within the EU while Italy, this year, has also elected a strongly anti-immigration government. Elections to the EU parliament are due in May/June 2019;
- Continuing protectionism under President Trump; and
- There are concerns around the level of US corporate debt which has swollen massively during the period of low borrowing rates in order to finance mergers and acquisitions. This has resulted in the debt of many large corporations being downgraded to a BBB credit rating, close to junk status.

**8.7 The potential for upside risks to current forecasts for UK gilt yields and PWLB rates, especially for longer term PWLB rates include:**

- The Bank of England is too slow in its pace and strength of increases in Bank Rate and therefore, allows inflation pressures to build up too strongly within the UK economy, which then necessitates a later rapid series of increases in Bank Rate faster than we currently expect. UK inflation returning to sustained significantly higher levels causing an increase in the inflation premium inherent to gilt yields;
- If the UK faces a general election in the next 12 months, this could result in a potential loosening monetary policy and therefore medium to long dated gilt yields could rise on the expectation of a weak pound and there would be concerns around inflation picking up;
- Brexit – if both sides were to agree a compromise that removed all threats of economic and political disruption; and
- The Federal Reserve causing a sudden shock in financial markets through misjudging the pace and strength of increases in its Federal Funds Rate and in the pace and strength of reversal of Quantitative Easing, which then leads to a fundamental reassessment by investors of the relative risks of holding bonds, as opposed to equities. This could lead to a major flight from bonds to equities and a sharp increase in bond yields in the US, which could then spill over into impacting bond yields around the world.

**9. BORROWING STRATEGY 2019/20 – 2021/22**

- 9.1 The uncertainty over future interest rates increases the risks associated with treasury activity. Investment returns are likely to remain low during 2019/20 but to be on a gently rising trend over the next few years. As a result, the Commissioner will continue a cautious approach to treasury strategy.**

- 9.2 The Chief Finance Officer (CFO) (Section 151 Officer), under delegated powers, will take the most appropriate form of borrowing depending on the prevailing interest rates at the time, taking into account the risks shown in the forecast above. It is likely that shorter term fixed rates may provide lower cost opportunities in the short/medium term.
- 9.3 The Commissioner is currently maintaining a neutral-borrowing position. This means that the capital borrowing need (the CFR), has been fully matched with loan debt. For 2019/20 this debt represents the finance lease liability linked to the PFI asset. The Commissioner plans to settle this liability in 2019/20 and the costs of such a strategy have been included in the Capital Programme.
- 9.4 The Commissioner will not have any further CFR in 2019/20 as committed funds will be utilised to fund the Capital Programme.
- 9.5 External debt will only be sought once the committed funds earmarked for capital expenditure have been utilised. The Commissioner anticipates that external borrowing will be required from 2020/21. The over-borrowing position is a direct impact of the MRP charge reducing the CFR.

## 10. INVESTMENT STRATEGY 2019/20 – 2021/22

- 10.1 **Key Objectives** - The Commissioner's primary investment strategy objectives are, firstly, safeguarding the re-payment of the principal and interest of his investments on time and, secondly, ensuring adequate liquidity. The investment return is an important third objective, but not as important as the first two objectives. Following the economic background outlined above, the current investment climate has one over-riding risk consideration; that of counterparty security risk.
- 10.2 **Risk Benchmarking** – A development in the revised 2011 Codes and the Welsh Government Investment Guidance is the consideration and approval of security and liquidity benchmarks. Yield benchmarks are currently widely used to assess investment performance. Discrete security and liquidity benchmarks are new requirements in the revised Code, although the application of these is more subjective in nature.
- 10.3 These benchmarks are simple guides (not limits) and so may be breached from time to time, depending on movements in interest rates and counterparty criteria. The purpose of the benchmark is that officers will monitor the current and trend position and amend the operational strategy to manage risk as conditions change. Any breach of the benchmarks will be reported, with supporting reasons in the Mid-Year or Annual Report.
- 10.4 **Security** - The Commissioner's maximum security risk benchmark for the current portfolio, when compared to these historic default tables, is:



- (i) 0.009% historic risk of default when compared to the whole portfolio.

**10.5 Liquidity – In respect of this area the Commissioner seeks to maintain:**

- (i) Liquid short term deposits of at least £2m available with a week's notice; and
- (ii) Weighted Average Life of investments with banks between 3 and 12 months; and
- (iii) Note that no overdraft facility is held at Lloyds bank.

**10.6 Yield - Local measures of yield benchmarks are:**

- (i) Investments – Internal returns compared to the 7 day London Interbank Bid Rate (LIBID).

**10.7 The security benchmark for each individual year is:**

	1 year	2 years	3 years	4 years	5 years
Maximum	0.009%	Not applicable	Not applicable	Not Applicable	Not Applicable

Note: This benchmark is an average risk of default measure, and would not constitute an expectation of loss against a particular investment.

**10.8 Investment Counterparty Selection Criteria - The primary principle governing the Commissioner's investment criteria is the security of his investments, although the yield or return on the investment is also a key consideration. The Commissioner will not use non-specified investments i.e. investments exceeding 1 year 364 days. The Commissioner will ensure:**

- (i) A policy covering types of investment, criteria for choosing investment counterparties with adequate security, and monitoring their security. This is set out in the Specified Investment (investments not exceeding 1 year 364 days) sections below; and
- (ii) Sufficient liquidity in investments. For this purpose procedures will be set out for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the prudential indicators covering the maximum principal sums invested.

**10.9 The Assistant Chief Officer - Resources will maintain a counterparty list in compliance with the following criteria. This criteria is separate from that which chooses Specified and Non-Specified Investments, as it provides an overall pool of counterparties considered high quality that the Commissioner may use rather than defining what his investments are.**

**10.10 The rating criteria uses the lowest common denominator method of selecting counterparties and applying limits. This means that the**

application of the Commissioner's minimum criteria will apply to the lowest available rating for any institution. For instance if an institution is rated by two agencies, one meets the Commissioner's criteria, the other does not, the institution will fall outside the lending criteria. This is in compliance with a CIPFA Treasury Management Panel recommendation in March 2009 and the CIPFA Treasury Management Code of Practice.

10.11 Credit rating information is supplied by the Commissioner's treasury consultants on all active counterparties that comply with the criteria below. Any counterparty falling to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating watches (notification of a likely change), rating outlooks (notification of a possible longer term change) are provided to officers almost immediately after they occur and this information is considered before dealing. For instance a negative rating watch applying to a counterparty at the minimum of the Commissioner's criteria will be suspended from use, with all others being reviewed in light of market conditions.

10.12 The Commissioner only uses the following high credit quality counterparties:

- (i) UK banks and banks domiciled in a country other than the UK which has a minimum Sovereign long term rating of AAA, which have at least the following Fitch, Moody's and Standard and Poor's ratings (where rated):
  - Short Term – F1/A1/P1;
  - Long Term – A;
- (ii) Part nationalised UK banks – Lloyds Banking Group and Royal Bank of Scotland. These banks can be included if they continue to be part nationalised or they meet the ratings in Banks above;
- (iii) Building Societies which:
  - Meet the ratings for banks outlined above; or
  - Have assets in excess of £1bn;
- (iv) Money Market Funds – AAA;
- (v) UK Government (including gilts and the DMADF (see below));
- (vi) Local Authorities; and
- (vii) Supranational institutions.

10.13 Due care will be taken to consider the country, group and sector exposure of the Commissioner's investments. In part, the country selection will be chosen by the credit rating of the Sovereign state. In addition:

- (i) No more than £3m will be placed with any single non-UK country at any time;
- (ii) Limits in place above will apply to Group companies; and
- (iii) Sector limits will be monitored regularly for appropriateness.

10.14 Additional requirements under the Code of Practice now require the Commissioner to supplement credit rating information. Whilst the above criteria relies primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market information will be applied before making any specific investment decision from the agreed pool of counterparties. This additional market information (for example Credit Default Swaps, negative rating watches/outlooks) will be applied to compare the relative security of differing investment counterparties.

10.15 The time and monetary limits for institutions on the Commissioner's Counterparty List are as follows:

	<b>Fitch (or equivalent)</b>	<b>Money Limit</b>	<b>Time Limit</b>
UK Banks (Groups)	<i>P1/F1/A1</i>	£10m	<365days
Non UK Banks (Groups)	<i>P1/F1/A1</i>	£5m	<365days
Building Societies	<i>P1/F1/A1</i>	£5m	<365days
Money Market Funds	AAA	£5m	<365days
Local Authorities	-	£15m	<2 years
UK DMO	-	None	<365days
Guaranteed Organisations	-	£3m*	<365days

*\*Guaranteed institutions will need to be restricted to the terms of the guarantee.*

10.16 Due to an increasing demand from Local Authorities for loans it is recommended that the money limit is increased from £10m to £15m per Local Authority.

10.17 In the normal course of the Commissioner's cash flow operations it is expected that only Specified Investments will be utilised.

10.18 The criteria for choosing counterparties set out above provide a sound approach to investment in 'normal' market circumstances. However, under exceptional market conditions the CFO may, after consulting the Commissioner, temporarily restrict further investment activity to those counterparties considered of higher credit quality than the minimum criteria set out for approval. These restrictions will remain in place until the banking system returns to 'normal' conditions. Similarly the time periods for investments may be restricted. Examples of these restrictions would be the greater use of the Debt Management Account Deposit Facility (DMADF – a Government body which accepts local authority deposits), Money Market Funds, guaranteed deposit facilities and strongly rated institutions offered support by the UK

Government. The credit criteria have been amended to reflect these facilities.

10.19 Additionally, the Commissioner reserves the right to continue to hold an investment if the institutions credit rating is down-graded during the investment period if he is satisfied that the risks associated with the institution and investment are able to be managed and/or mitigated appropriately.

#### 10.20 Banking Arrangements

The Commissioner's banker is Lloyds Bank, having switched from the Co-operative Bank during 2014/15. The contract with Lloyds expires on 30<sup>th</sup> July 2019; the retendering of which, is currently being progressed in conjunction with the Procurement Department.

### 11. SENSITIVITY TO INTEREST RATE MOVEMENTS

11.1 The Commissioner is required to disclose in the accounts the impact of risks on treasury management activity. Whilst most of the risks facing the treasury management service are addressed elsewhere in this report (credit risk, liquidity risk, market risk, maturity profile risk), the impact of interest rate risk is discussed but not quantified. The table below highlights the estimated impact of a 1% increase/decrease in all interest rates to the estimated treasury management costs/income for next year. That element of the debt and investment portfolios which are of a longer term, fixed interest rate nature will not be affected by interest rate changes.

Sensitivity to Interest Rate Movements		
	2019/20 Estimated +1% £000's	2019/20 Estimated -1% £000's
Interest on Borrowing	0	0
Investment Income	424	(280)

### 12. TREASURY MANAGEMENT - LIMITS ON ACTIVITY

12.1 There are four further treasury activity limits, which were previously prudential indicators. The purpose of these is to contain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of an adverse movement in interest rates. The Commissioner approves these limits.

	2019/20	2020/21	2021/22
<b>Interest rate Exposures</b>			
	<b>Upper</b>	<b>Upper</b>	<b>Upper</b>
<b>Limits on fixed Interest rates based on net debt</b>	100%	100%	100%
<b>Limits on variable Interest rates based on net debt</b>	35%	35%	35%
<b>Maturity Structure of fixed interest rate borrowing 2019/20</b>			
	<b>Lower</b>	<b>Upper</b>	
<b>Under 12 months</b>	0%	20%	
<b>12 months to 2 years</b>	0%	20%	
<b>2 years to 5 years</b>	0%	20%	
<b>5 years to 10 years</b>	0%	20%	
<b>10 years and above</b>	20%	90%	
<b>Maximum principal sums invested &gt; 364 days</b>			
<b>Principal sums invested &gt; 364 days</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
	15	15	15

### 13. PERFORMANCE INDICATORS

13.1 The Code of Practice on Treasury Management requires the Commissioner to set performance indicators to assess the adequacy of the treasury function over the year. These are distinct historic indicators, as opposed to the prudential indicators, which are predominantly forward looking. Performance indicators to be used for the treasury function are:

- (i) Debt – Borrowing - Average rate of borrowing for the year compared to PWLB rates; and
- (ii) Investments – Internal returns compared with the 7 day LIBID rate.

The results of these indicators will be reported in the Treasury Annual Report.

### 14. TREASURY MANAGEMENT ADVISERS

14.1 The Commissioner uses Link Asset Services as treasury management advisers. The company provides a range of services which include:

- (i) Technical support on treasury matters, capital finance issues and code compliance;
- (ii) Economic and Interest rate analysis;
- (iii) Debt services which includes advice on the timing of borrowing;
- (iv) Debt rescheduling advice surrounding the existing portfolio;
- (v) Generic investment advice on interest rates, timing and investment instruments; and
- (vi) Credit ratings/market information service, comprising the three main credit rating agencies.

**14.2** Whilst the advisers provide support to the internal treasury function, under current market rules and the CIPFA Code of Practice the final decision on treasury matters remains with the Commissioner.

**15. TREASURY MANAGEMENT TRAINING**

**15.1** Officer training needs are assessed on appointment, as part of the Personal Development Review (PDR) process and when legislation changes are announced. Officers attend seminars arranged by Link Asset Services and other organisations. Staff within the Office of the Police and Crime Commissioner and Joint Audit Committee members also receive periodic Treasury Management training.

## **APPENDIX B**

### **SCHEDULE OF TREASURY MANAGEMENT PRACTICES (TMP's)**

**TMP 1 - Risk Management**

**TMP 2 - Performance Measurement**

**TMP 3 - Decision-Making and Analysis**

**TMP 4 - Approved Instruments, Methods and Techniques**

**TMP 5 - Organisation, Clarity and Segregation of Responsibilities and Dealing Arrangements**

**TMP 6 - Reporting Requirements and Management Information Arrangements**

**TMP 7 - Budgeting, Accounting and Audit Arrangements**

**TMP 8 - Cash and Cash Flow Management**

**TMP 9 - Money Laundering**

**TMP 10 - Training and Qualifications**

**TMP 11 - Use of External Service Providers**

**TMP 12 - Corporate Governance**

## **Treasury Management Practice (TMP) 1 RISK MANAGEMENT**

### **1. CREDIT AND COUNTERPARTY RISK MANAGEMENT**

#### **1.1 CRITERIA TO BE USED FOR CREATING AND MANAGING APPROVED COUNTERPARTY LISTS/LIMITS**

1.1.1 The Welsh Government issued revised Investment Guidance in April 2010, and this forms the structure of the Commissioner's policy below.

1.1.2 The key intention of the Guidance is to maintain the current requirement for Local Authorities and Police and Crime Commissioners to invest prudently and that priority is given to security and liquidity before yield. In order to facilitate this objective the guidance requires the Commissioner to have regard to the CIPFA publication Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes (2011 edition). **TMP 1(1), covering investment counterparty policy requires approval each year.**

1.1.3 **Annual Investment Strategy** - The key requirements of both the Code and the investment guidance are to set an annual investment strategy, as part of its annual treasury strategy for the following year, covering the identification and approval of following:

- a) The strategy guidelines for choosing and placing investments, particularly non-specified investments;
- b) The principles to be used to determine the maximum periods for which funds can be committed;
- c) Specified investments the Commissioner will use. These are high security (i.e. high credit rating, although this is defined by the Commissioner, and no guidelines are given), and high liquidity investments in sterling and with a maturity of no more than a year (two years for Local Authorities); and
- d) Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

1.1.4 The investment policy proposed for the Commissioner is:

**Strategy Guidelines** – The main strategy guidelines are contained in the Treasury Management Strategy.

**Specified Investments** – These investments are sterling investments of not more than one-year maturity (two years for Local Authorities), or those which could be for a longer period but where the Commissioner has the right to be repaid within 12 months if he wishes. These are considered low risk assets where the possibility of loss of principal or investment income is small. These would include sterling investments which would not be defined as capital expenditure with:

- a) The UK Government (such as the Debt Management Account Deposit Facility (DMADF), UK Treasury Bills or a Gilt with less than one year to maturity);
- b) Supranational bonds of less than one year's duration;
- c) A Local Authority, parish council or community council;
- d) Pooled investment vehicles (such as money market funds) that have been awarded a high credit rating by a credit rating agency. Money Market Funds, have to be rated AAA by Standard and Poor's, Moody's or Fitch rating agencies; and



- e) A body that is considered of a high credit quality (such as a bank or building society. This covers bodies with a minimum short term rating of P1/F1/A1 (or the equivalent) as rated by Standard and Poor's, Moody's or Fitch rating agencies.

Within these bodies, and in accordance with the Code, the Commissioner has set additional criteria to set the time and amount of monies which will be invested in these bodies. Non-specified investments will not be utilised.

- 1.1.5 **The Monitoring of Investment Counterparties** - The credit rating of counterparties will be monitored regularly. The Commissioner receives credit rating information (changes, rating watches and rating outlooks) from Link Asset Services (formerly known as Capita Asset Services) as and when ratings change, and counterparties are checked promptly. On occasion ratings may be downgraded when an investment has already been made. The Commissioner retains the right to continue an investment until it matures in the event of a down-grading providing that the exposure risk can be managed and/or mitigated appropriately. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately by treasury management staff and if required new counterparties which meet the criteria will be added to the list.
- 1.1.6 The Treasury Management Strategy will include suitable criteria for assessing and monitoring the credit risk of investment counterparties which will be used to construct a lending list comprising time, type, sector, country and specific counterparty limits.
- 1.1.7 Treasury management staff will add or delete counterparties to/from the approved counterparty list in line with the policy on criteria for selection of counterparties.
- 1.1.8 The Commissioner will use credit criteria to determine creditworthy counterparties for the placing of investments.
- 1.1.9 In the event that more than one rating agency provides a credit rating for a counterparty, then the Lowest Common Denominator (LCD) approach must be applied when determining the rating for a particular counterparty.
- 1.1.10 Treasury Management Consultants will provide a weekly update of all ratings relevant to the Commissioner and notify the Commissioner of any changes to credit ratings during the week.
- 1.1.11 The approved counterparty list and type, limit and period of investment are determined by the criteria set out in the Annual Treasury Management Strategy.
- 1.1.12 The Commissioner should not place an over reliance on credit rating information. Other market information, such as concerns raised in the quality financial press, should also be used to ascertain the credit risk of a particular counterparty.
- 1.2 **APPROVED METHODOLOGY FOR CHANGING LIMITS AND ADDING / REMOVING COUNTERPARTIES**
  - 1.2.1 Credit ratings for individual counterparties can change at any time. The Chief Finance Officer (Section 151 Officer) to the Office of the Police and Crime Commissioner (hereafter referred to as the CFO) is responsible for applying the stated credit rating criteria for selecting approved counterparties; and will add or delete counterparties as appropriate to / from the approved counterparty list, when there is a change in the credit ratings of individual counterparties or in banking structures e.g. on mergers or takeovers. This is delegated on a daily basis to staff in the Finance Department.

## **2. LIQUIDITY RISK MANAGEMENT**

### **2.1 CASH BALANCES, BORROWING AND INVESTMENTS**

2.1.1. The Commissioner will ensure adequate cash resources, borrowing arrangements and overdraft facilities, for the achievement of business/service objectives.

2.1.2 The Commissioner will only borrow in advance of need where there is a clear business case for doing so and will only do so for the current capital programme or to finance future debt maturities.

2.1.3 The Commissioner will maintain the following:

a) Liquid short term deposits of at least £2m available with a week's notice.

2.1.4 The Commissioner will also monitor the weighted average length of deposits so that the weighted average life of deposits is between 3 months with a maximum of 12 months.

## **3. INTEREST RATE RISK MANAGEMENT**

### **3.1 Minimum/Maximum proportions of variable rate debt/Interest**

Minimum proportion of interest on borrowing which is subject to variable rate interest. 0 %

Maximum proportion of interest on borrowing which is subject to variable rate interest 35 %

### **3.2 Minimum/Maximum proportions of fixed rate debt/Interest**

Minimum proportion of interest on borrowing which is subject to fixed rate interest. 65 %

Maximum proportion of interest on borrowing which is subject to fixed rate interest 100 %

### **3.3 Forward Dealing**

Consideration will be given to dealing for forward periods dependent upon market conditions. When forward dealing is more than one week forward, the approval of the Head of Finance is required.

## **4. EXCHANGE RATE RISK MANAGEMENT**

### **4.1 Approved criteria for managing changes in exchange rate levels**

a) As a result of the nature of the business, there may from time to time be exposure to exchange rate risk. This will arise from the receipt of income or the incurring of expenditure in a currency other than sterling. The Commissioner will adopt a full hedging strategy to control and add certainty to the sterling value of these transactions. This will mean that the Commissioner will eliminate all foreign exchange exposures as soon as they are identified; and

- b) Where there is a contractual obligation to receive income or make a payment in a currency other than sterling at a date in the future, forward foreign exchange transactions will be considered. Unexpected receipt of foreign currency income will be converted to sterling at the earliest opportunity unless the Commissioner has a contractual obligation to make a payment in the same currency at a date in the future. In this instance, the currency will be held on deposit to meet this expenditure commitment.

## **5. REFINANCING RISK MANAGEMENT**

### **5.1 DEBT/OTHER CAPITAL FINANCING MATURITY PROFILING, POLICIES AND PRACTICES**

- 5.1.1 The organisation will ensure that its borrowing, private finance and partnership arrangements are negotiated, structured and documented, and the maturity profile of the monies so raised are managed, with a view to obtaining offer terms for renewal financing, if required, which are competitive and as favourable to the Commissioner as can be reasonably achieved in light of the market conditions prevailing at the time.
- 5.1.2 The Commissioner will actively manage relationships with counterparties in these transactions in such a manner as to secure this objective, and will avoid over reliance on any one source of funding if this might jeopardise achievement of the above.

## **6. LEGAL AND REGULATORY**

### **6.1 REFERENCES TO RELEVANT STATUTES AND REGULATIONS**

- 6.1.1 The treasury management activities of the Commissioner shall comply fully with legal statute and the regulations. These are:
  - a) CIPFA's Treasury Management Code of Practice (2017 Edition);
  - b) CIPFA Treasury Management in the Public Services Guidance Notes 2018
  - c) CIPFA statement 17.10.18 on borrowing in advance of need and investment in commercial properties
  - d) CIPFA Standard of Professional Practice on Treasury Management;
  - e) CIPFA Bulletin 02 Treasury and Capital Management Update October 2018
  - f) Statutory Investment guidance (2018)
  - g) Statutory MRP guidance (2018)
  - h) The Prudential Code for Capital Finance in Local Authorities (2017 Edition);
  - i) Local Government Act 2003;
  - j) Bank of England Non Investment Products Code (2011);
  - k) Standing Orders relating to Contracts;
  - l) Financial Standing Orders, Regulations and Procedures; and
  - m) The Commissioner's Manual of Corporate Governance and Scheme of Delegation.
  - n) Markets in Financial Instruments Directive (MiFID II).

### **6.2 PROCEDURES FOR EVIDENCING THE ORGANISATION'S POWERS / AUTHORITIES TO COUNTERPARTIES**

- 6.2.1 The Commissioner will prepare, adopt and maintain, as the cornerstones for effective treasury management:

- a) A Treasury Management Strategy Statement, stating the overriding principles and objectives of his treasury management activities as an integral part of that Statement; and
- b) Treasury Management Practices, setting out the manner in which the Commissioner will achieve those principles and objectives, prescribing how he will manage and control those activities.

### **6.3 REQUIRED INFORMATION FROM COUNTERPARTIES CONCERNING THEIR POWERS/AUTHORITIES**

- 6.3.1 Lending shall only be made to counterparties on the authorised list.
- 6.3.2 The Office of the Police and Crime Commissioner for Gwent will apply the MIFID II regulations using the elected professional status to allow the Commissioner to execute his investment strategy.

### **6.4 STATEMENT ON THE ORGANISATION'S POLITICAL RISKS AND MANAGEMENT OF SAME.**

- 6.4.1 The CFO shall take appropriate action with the Commissioner to respond and manage appropriately political risks.

## **7. FRAUD, ERROR AND CORRUPTION, AND CONTINGENCY MANAGEMENT**

### **7.1 DETAILS OF SYSTEMS AND PROCEDURES TO BE FOLLOWED, INCLUDING INTERNET SERVICES**

#### **7.1.1 Authority:**

- a) Loan procedures are defined in the Commissioner's Financial Standing Orders, Regulations and Procedures; and
- b) The Scheme of Delegation sets out the appropriate delegated levels. All loans and investments are negotiated by authorised persons.

#### **7.1.2 Occurrence:**

- a) A detailed register of loans and investments is maintained and independently checked to the ledger balance;
- b) Adequate and effective cash flow forecasting records are maintained on the Treasury Management spreadsheet to support the decision to lend or borrow;
- c) A written acknowledgement of the deal is sent promptly in the case of borrowing from or lending to another counterparty; and
- d) All transactions placed through the brokers are confirmed by a broker note showing details of the loan arranged.

#### **7.1.3 Completeness:**

- a) The loans register is updated to record all lending and borrowing. This includes the date of the transaction, brokerage fees etc.

#### **7.1.3 Measurement:**

- a) The calculation of repayment of principal and interest notified by the lender or borrower is checked for accuracy;

- b) The Treasury Management spreadsheet automatically calculates periodic interest payments of Public Works Loans Board (PWLB) and other long term loans. This is used to check the amount paid to these lenders; and
- c) Rates generated are compared with other Local Authorities and against the Treasury Strategy Statement.

#### 7.1.4 Timeliness:

- a) The Assistant Accountant responsible for treasury ensures that money borrowed or lent is repaid on time.

#### 7.1.4 Regularity:

- a) All lending is only made to institutions on the Approved List;
- b) All loans raised and repayments made go directly to and from the Commissioner's bank accounts;
- c) Limits on value are set for every category of specified and non-specified investments and institution;
- d) Brokers have a list of named officials authorised to perform loan transactions;
- e) There is adequate insurance cover for employees involved in loans management and accounting;
- f) The control totals on the Treasury Management spreadsheet for borrowing and lending are regularly reconciled with the ledger balance sheet codes under the direction of the SFA.
- g) There is a separation of duties in the Section between the repayment of a loan and its checking and authorisation;
- h) The bank reconciliation is carried out regularly from the bank statement to the financial ledger; and
- i) The Assistant Accountants have up to date financial code lists.

#### 7.1.5 Security:

- a) The Treasury Management Investment spreadsheet can only be accessed by a password; and
- b) Payments can only be authorised by nominated persons, using the Lloyds Bank On-line Banking System. The list of signatories having previously been agreed with the current provider of our banking services, this is reviewed on a quarterly basis.

#### 7.1.6 Substantiation:

- a) The Treasury Management spreadsheet balances are proved to the balance sheet ledger codes at the end of each month and at the financial year end. Working papers are retained for audit inspection; and
- b) A debt charge/Investment Income listing is produced every time the debt charges/Investment Income is recalculated for budget monitoring purposes. A debt charge/Investment listing is also produced at the financial year end and this document is retained for audit inspection. The method of accounting for unrealised losses or gains on the valuation of assets within the funds will comply with best CIPFA Accounting Code of Practice by reflecting the market value of the fund in the balance sheet. This will be agreed with external auditors.

## 7.2 EMERGENCY AND CONTINGENCY PLANNING ARRANGEMENTS

**7.2.1** Emergency payments are normally made using the Lloyds Commercial On-line Banking System. Balances can also be obtained from the same system. In the event of failure of the electronic system, alternative arrangements can be made by fax or e-mail.

### **7.3 INSURANCE COVER DETAILS.**

**7.3.1** The Commissioner has general 'Fidelity' insurance cover of £1m, increased to £3m for specific posts within the Finance Department. This covers the loss of cash by fraud or dishonesty of employees and carries a £10,000 excess level.

**7.3.2** The Commissioner also has a 'Business Interruption' cover of £3m (with a 36 month indemnity – totalling £9,000,000) as part of his insurance arrangements.

## **8. MARKET RISK MANAGERMENTS**

### **8.1 DETAILS OF APPROVED PROCEDURES AND LIMITS FOR CONTROLLING EXPOSURE TO INVESTMENTS WHOSE CAPITAL VALUE MAY FLUCTUATE (GILTS, CDS, etc.)**

**8.1.1** The Commissioner currently does not invest in instruments where capital value can fluctuate.

## **TMP 2 PERFORMANCE MEASUREMENT**

### **2.1 METHODOLOGY TO BE APPLIED FOR EVALUATING THE IMPACT OF TREASURY MANAGEMENT DECISIONS**

2.1.1 The Commissioner carries out efficiency reviews on a rolling programme basis.

### **2.2 POLICY CONCERNING METHODS FOR TESTING VALUE FOR MONEY IN TREASURY MANAGEMENT**

#### **2.2.1 Frequency and processes for tendering**

a) The process for advertising and awarding contracts will be in line with Contract Standing Orders.

#### **2.2.2 Banking services**

a) Banking services will be re-tendered in accordance with Contract Standing Orders.

#### **2.2.3 Money-broking services**

a) The Commissioner will use money broking services in order to make deposits or to borrow, and will establish charges for all services prior to using them. An approved list of brokers will be established which takes account of both prices and quality of services.

#### **2.2.4 Consultants'/advisers' services**

a) The Commissioner currently uses Link Asset Solutions as treasury management consultants. The contract for this service is let in accordance with Contract Standing Orders.

#### **2.2.5 Policy on External Managers**

a) The Commissioner's current policy is to manage cash flow surpluses and deficits in-house. This policy will be kept under review.

### **2.3 METHODS TO BE EMPLOYED FOR MEASURING THE PERFORMANCE OF THE ORGANISATION'S TREASURY MANAGEMENT ACTIVITIES**

2.3.1 Performance measured against Annual Treasury Strategy Statement targets.

2.3.2 Compliance to CIPFA Code of Treasury Practice.

2.3.3 Expenses contained within approved budget.

### **2.4 BENCHMARKS AND CALCULATION METHODOLOGY**

#### **2.4.1 Debt management**

- a) Average rate on all external debt;
- b) Average rate on external debt borrowed in previous financial year;
- c) Average rate on internal borrowing;
- d) Average period to maturity of external debt;

- e) Average period to maturity of new loans in previous year; and
- f) Comparison with UK average for public sector bodies.

#### **2.4.2 Investment.**

- a) The performance of in house investment earnings will be measured against the 7 day LIBID rate.



## **TMP 3 DECISION-MAKING AND ANALYSIS**

### **3.1 FUNDING, BORROWING, LENDING, AND NEW INSTRUMENTS/TECHNIQUES:**

#### **3.1.1 Records to be kept**

3.1.2 The Finance Department maintains a treasury management spreadsheet. All loan transactions and investments are recorded using this system.

3.1.2 The following records will be used relative to each loan or investment:

- a) Daily cash projections;
- b) Telephone and email rates;
- c) Dealing slips for all money market transactions – including rate changes;
- d) PWLB loan schedules;
- e) Temporary loan receipts;
- f) Market bond certificates;
- g) Special loan certificates; and
- h) Brokers confirmations for deposits/investments.

#### **3.2 Processes to be pursued**

- a) Cash flow analysis;
- b) Maturity Analysis;
- c) Security Analysis;
- d) Liquidity Analysis (Weighted Average Life);
- e) Yield Analysis;
- f) Ledger reconciliations;
- g) Review of borrowing requirement;
- h) Monitoring of projected loan charges, interest and expenses costs;
- i) Collation of monthly performance information; and
- j) Monitoring against Prudential Limits.

#### **3.3 Issues to be addressed**

##### **3.3.1 In respect of every decision made the organisation will:**

- a) Above all be clear about the nature and extent of the risks to which the organisation may become exposed;
- b) Be certain about the legality of the decision reached and the nature of the transaction and that all authorities to proceed have been obtained;
- c) Be content that the documentation is adequate both to deliver the organisation's objectives and protect the organisation's interests, in order to deliver good housekeeping;
- d) Ensure that third parties are judged satisfactory in the context of the organisation's creditworthiness policies, and that limits have not been exceeded; and
- e) Be content that the terms of any transactions have been fully checked against the market, and have been found to be competitive.

##### **3.3.2 In respect of borrowing and other funding decisions, the organisation will:**

- a) Evaluate the economic and market factors that might influence the manner and timing of any decision to fund;

- b) Consider the merits and demerits of alternative forms of funding, including funding from revenue, leasing and private partnerships;
- c) Consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use; and
- d) Consider the on-going revenue liabilities created, and the implications for future plans and budgets.

**3.3.3 In respect of investment decisions, the organisation will:**

- a) Consider the optimum period, in the light of cash flow availability and prevailing market conditions; and
- b) Consider the alternative investment products and techniques available, especially the implications of using any which may expose the organisation to changes in the value of its capital.

## **TMP 4 APPROVED INSTRUMENTS, METHODS AND TECHNIQUES**

### **4.1. APPROVED ACTIVITIES OF THE TREASURY MANAGEMENT OPERATION**

- 4.1.1 Borrowing.
- 4.1.2 Lending.
- 4.1.3 Debt repayment and rescheduling.
- 4.1.4 Consideration, approval and use of new financial instruments and treasury management techniques.
- 4.1.5 Managing the underlying risk associated with the capital financing and surplus funds activities.
- 4.1.6 Managing cash flow.
- 4.1.7 Banking activities.
- 4.1.8 Leasing.
- 4.1.9 Managing the underlying exchange rate risk associated with business activities.

### **4.2. APPROVED INSTRUMENTS FOR INVESTMENTS**

- 4.2.1 All investments will comply with the Annual Treasury Management Strategy and the guidance issued by the Welsh Government on Investment Strategy issued under Section 15(1) (a) of the Local Government Act 2003. The instruments available for investment and the limitations on their use will be listed in the appendix to the Annual Treasury Management Strategy.

### **4.3. APPROVED METHODS AND SOURCES OF RAISING CAPITAL FINANCE**

- 4.3.1 Finance will only be raised in accordance with the Prudential Code. The Commissioner has a number of approved methods and sources of raising capital finance. These are:

<b>On Balance Sheet</b>	<b>Fixed</b>	<b>Variable</b>
PWLB	●	●
European Investment Bank	●	●
Market (long-term or temporary)	●	●
Market (Lender Option Borrower Option)	●	●
Stock Issues	●	●
Local temporary	●	●
Local Bonds	●	
Overdraft		●
Negotiable Bonds	●	●
Internal (capital receipts & revenue balances)	●	●
Commercial Paper	●	
Medium Term Notes	●	
Leasing (not operating leases)	●	●
Deferred Purchase	●	●

#### **4.3.2 Other Methods of Financing**

- a) Government and EU Capital Grants;
- b) Lottery monies;
- c) Private Finance Initiative/Public Private Partnerships;
- d) Operating leases; and
- e) Joint arrangements.

**4.3.3 All forms of funding will be considered dependent on the prevailing economic climate, regulations and local considerations. The CFO has delegated powers in accordance with Standing Orders, Financial Regulations, the Scheme of Delegated Powers and the Treasury Management Strategy to take the most appropriate form of borrowing from the approved sources.**

## **TMP 5 ORGANISATION, CLARITY AND SEGREGATION OF RESPONSIBILITIES, AND DEALING ARRANGEMENTS**

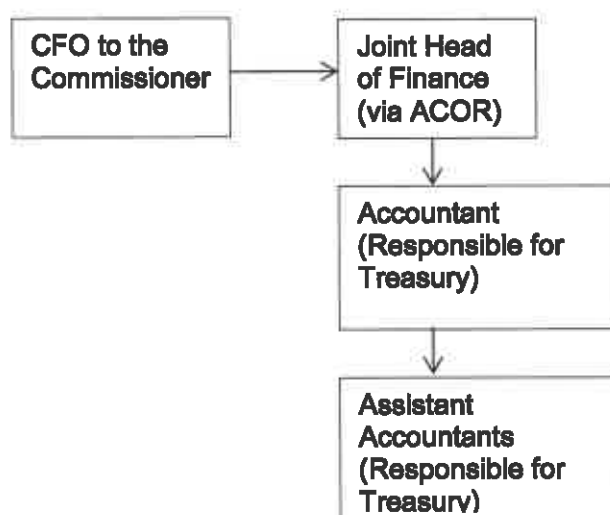
### **INDEX OF SCHEDULES**

- 5.1 Limits to responsibilities/discretion**
- 5.2 Treasury management organisation chart**
- 5.3 Statement of duties/responsibilities of each treasury post**
- 5.4 Absence cover arrangements**
- 5.5 Dealing Limits**
- 5.6 List of approved brokers**
- 5.7 Policy on brokers' services**
- 5.8 Policy on taping of conversations**
- 5.9 Direct dealing practices**
- 5.10 Settlement transmission procedures**
- 5.11 Documentation requirements**

## **5.1 LIMITS TO RESPONSIBILITIES/DISCRETION**

- 5.1.1 The CFO will be responsible for recommending amendments to the organisation's adopted clauses, Treasury Management policy statement and treasury management practices.
- 5.1.2 The CFO will approve the segregation of responsibilities.
- 5.1.3 The CFO will receive and review external audit reports concerning treasury management and put recommendations to the Joint Audit Committee and/or Commissioner.

## **5.2 TREASURY MANAGEMENT ORGANISATION CHART**



## **5.3 STATEMENT OF DUTIES/RESPONSIBILITIES OF EACH TREASURY POST**

### **5.3.1 CFO**

a) The CFO will:

- i. Recommend clauses, treasury management policy / practices for approval, reviewing the same on a regular basis, and monitoring compliance;
- ii. Submit treasury management policy reports as required;
- iii. Submit budgets and budget variations in accordance with Financial Regulations and Procedures;
- iv. Receive and review management information reports;
- v. Review the performance of the treasury management function and promote best value reviews;
- vi. Ensure the adequacy of treasury management resources and skills; and the effective division of responsibilities within the treasury management function;
- vii. Ensure the adequacy of internal audit, and liaising with external audit; and
- viii. Recommend on appointment of external service providers in accordance with standing orders.

- b) The CFO has delegated powers through this policy to take the most appropriate form of borrowing from the approved sources, and to make the most appropriate form of investments in approved instruments; and
- c) Power to borrow and invest may be delegated to members of the Finance Department. The Assistant Accountant (or staff authorised by the Accountant to act as temporary cover for leave/sickness) must conduct all dealing transactions;

### **5.3.2 Assistant Accountant – Treasury Management**

- a) Execution of transactions;
- b) Adherence to agreed policies and practices on a day-to-day basis;
- c) Maintaining relationships with third parties and external service providers;
- d) Monitoring performance on a day-to-day basis;
- e) Submitting management information reports to the Accountant responsible for Treasury; and
- f) Identifying and recommending opportunities for improved practices.

### **5.3.3 Accountant responsible for Treasury**

- a) The Accountant will manage the day to day operation of the treasury function;
- b) The Accountant will ensure that the Treasury Management Strategy and TMP's are adhered to, and if not will bring the matter to the attention of the Joint Head of Finance with responsibility for Treasury as soon as possible;
- c) Prior to entering into any capital financing, lending or investment transaction, it is the responsibility of the Accountant to be satisfied that the proposed transaction does not breach any statute, external regulation or the Financial Regulations and Procedures; and
- d) It is also the responsibility of the Accountant to ensure that the Commissioner complies with the requirements of The Non-Investment Products Code (formerly known as The London Code of Conduct) for principals and broking firms in the wholesale markets.

### **5.3.4 Internal Audit**

- a) Reviewing compliance with approved policy and procedures;
- b) Reviewing division of duties and operational practice;
- c) Assessing value for money from treasury activities; and
- d) Undertaking probity audit of treasury function.

## **5.4 ABSENCE COVER ARRANGEMENTS**

- 5.4.1 In the absence of the Assistant Accountant his/her treasury management duties are carried out by the Accountant or a member of staff in the Finance Department nominated by the Accountant.

## **5.5 DEALING LIMITS**

- 5.5.1 Dealing limits are set out in the Annual Treasury Management Strategy.

## **5.6 LIST OF APPROVED BROKERS**

- 5.6.1 A list of approved brokers is maintained within the Finance Department and a record of all transactions recorded against them.

## **5.7 POLICY ON BROKERS' SERVICES**

5.7.1 It is the Commissioner's policy to allocate business to the brokers offering the best rate on the day.

## **5.8 POLICY ON TAPING OF CONVERSATIONS**

5.8.1 It is not Commissioner's policy to tape brokers' conversations.

## **5.9 DIRECT DEALING PRACTICES**

5.9.1 Direct dealing contacts are established with the Commissioner's own bank and several other banks and building societies via the use of Business Reserve Accounts. Direct dealing can bring additional benefits e.g. may take smaller amounts for deposits and may lend direct as well saving on broking fees.

## **5.10 SETTLEMENT TRANSMISSION PROCEDURES**

5.10.1 The Assistant Accountant will produce documentation to support the transaction set up within the Lloyds On-Line system. An approved signatory will authorise the payment within Lloyds Commercial On-Line.

## **5.11 DOCUMENTATION REQUIREMENTS**

For each deal undertaken, a record should be prepared giving details of dealer, amount, period, counterparty, interest rate, dealing date, payment date(s), and broker.



## **TMP 6 REPORTING REQUIREMENTS AND MANAGEMENT INFORMATION ARRANGEMENTS**

### **6.1 ANNUAL TREASURY MANAGEMENT STRATEGY STATEMENT**

- 6.1.1 The Treasury Management Strategy sets out the specific expected treasury activities for the forthcoming financial year. This strategy will be submitted to the Commissioner for approval before the commencement of each financial year.
- 6.1.2 The formulation of the annual Treasury Management Strategy involves determining the appropriate borrowing and investment decisions in the light of the anticipated movement in both fixed and shorter term variable interest rates. For instance, this organisation may decide to postpone borrowing if fixed interest rates are expected to fall, or borrow early if fixed interest rates are expected to rise.
- 6.1.3 The Treasury Management Strategy is concerned with the following elements:-
- a) The current Treasury portfolio position;
  - b) The prospects for interest rates;
  - c) The limits placed by this organisation on treasury activities;
  - d) The expected borrowing strategy;
  - e) The expected temporary investment strategy;
  - f) The policy concerning retention of the set aside capital receipts;
  - g) The expectations for debt rescheduling;
  - h) Borrowing requirements; and
  - i) Any extraordinary treasury issue.
- 6.1.4 The Treasury Management Strategy will establish the expected move in interest rates against alternatives (using all available information such as published interest rate forecasts where applicable), and highlight sensitivities to different scenarios.

### **6.2 ANNUAL INVESTMENT STRATEGY**

- 6.2.1 One of the consequences of the introduction under the Local Government Act 2003 of the Prudential Code for Capital Finance in Local Authorities, was the withdrawal of the approved investment regulations. In place of the regulations, guidance on investment practice was formally issued by the Welsh Government requiring all local authorities (including Commissioners) to formulate an annual investment strategy to be adopted by the Commissioner prior to the start of the financial year.
- 6.2.2 The Annual Investment Strategy will cover the following:
- a) Investment Principles;
  - b) Specified and Non-Specified Investments;
  - c) Permitted Investments;
  - d) Liquidity;
  - e) Security of Capital;
  - f) Investment Limits; and
  - g) External Fund Managers.

### **6.3 POLICY ON INTEREST RATE EXPOSURE**

- 6.3.1 The Commissioner approves before the beginning of each financial year the following treasury limits:

- a) The amount of the overall borrowing limit which may be outstanding by way of short term borrowing; and
- b) The maximum proportion of interest on borrowing which is subject to variable rate interest.

6.3.2 The CFO is responsible for incorporating these limits into the Annual Treasury Management Strategy, and for ensuring compliance with the limits. Should it prove necessary to amend these limits, the CFO shall submit the changes for approval to the Commissioner.

#### **6.4 ANNUAL REPORT ON TREASURY MANAGEMENT ACTIVITY**

6.4.1 An annual report will be presented to the Commissioner at the earliest practicable meeting after the end of the financial year, but in any case by the 30<sup>th</sup> September. This report will include the following:

- a) A comprehensive picture for the financial year of all treasury policies, plans, activities and results;
- b) Transactions executed and their revenue (current) effects;
- c) Report on risk implications of decisions taken and transactions executed;
- d) Monitoring of compliance with approved policy, practices and statutory / regulatory requirements;
- e) Monitoring of compliance with powers delegated to officers;
- f) Degree of compliance with the original strategy and explanation of deviations;
- g) Explanation of future impact of decisions taken on the organisation;
- h) Measurements of performance; and
- i) Report on compliance with CIPFA Code recommendations.

#### **6.5 MANAGEMENT INFORMATION REPORTS**

6.5.1 Management information reports will be prepared every month by the Accountant and will be presented to the CFO.

6.5.2 These reports will contain the following information:

- a) A summary of transactions executed and their revenue (current) effects;
- b) Measurements of performance including effect on borrowing charges/investment income; and
- c) Degree of compliance with original strategy and explanation of variances.

#### **6.6 PERIODIC MONITORING COMMITTEE REPORTS**

6.6.1 The Commissioner will receive and consider as a minimum:

- a) An annual treasury strategy before the commencement of the new financial year;
- b) An annual investment strategy before the commencement of the new financial year;
- c) An annual treasury management activity report before the 30<sup>th</sup> September after the year end to which it relates; and
- d) A mid-year monitoring report.

## **TMP 7 BUDGETING, ACCOUNTING AND AUDIT ARRANGEMENTS**

### **7.1 STATUTORY/REGULATORY REQUIREMENTS**

- 7.1.1 The accounts are drawn up in accordance with the Code of Practice on Local Authority Accounting in Great Britain that is recognised by statute as representing proper accounting practices.

### **7.2 ACCOUNTING PRACTICES AND STANDARDS**

Due regard is given to the Statements of Recommended Practice and Accounting Standards as they apply to the Police Service in Great Britain. The Commissioner adopts in full the principles set out in CIPFA's 'Code of Best Practice and Guide for Treasury Management in the Public Services' (the 'CIPFA Code and Guide'), together with those of its specific recommendations that are relevant to this organisation's treasury management activities.

### **7.3 LIST OF INFORMATION REQUIREMENTS OF EXTERNAL AUDITORS.**

- 7.3.1 The following information is required by the external auditor:

- a) Reconciliation of loans interest and premiums paid to financial ledger by loan type;
- b) Maturity analysis of loans outstanding;
- c) Calculation of loans interest and debt management expenses;
- d) Annual Treasury Report;
- e) Calculation of Revenue Interest;
- f) Analysis of any Deferred Charges;
- g) Principal and interest charges from Treasury Management records; and
- h) Interest accruals calculation from Treasury Management records.

### **7.4 MONTHLY BUDGET MONITORING REPORT**

- 7.4.1 This report will consider year to date and forecast outturn against budget with variances examined in terms of interest and expense rates derived from the treasury management records.

### **7.5 BUDGET SETTING EXERCISE**

- 7.5.1 A budget for interest paid and received, expenses and minimum revenue provision is prepared as part of a budget setting exercise.

## **TMP 8 CASH AND CASH FLOW MANAGEMENT**

### **8.1 ARRANGEMENTS FOR PREPARING/SUBMITTING CASH FLOW STATEMENTS**

8.1.1 The Assistant Accountant responsible for day to day treasury management activities maintains a rolling annual cash flow budget, which is revised daily.

### **8.2 LISTING OF SOURCES OF INFORMATION**

8.2.1 In drawing up cash flow projections the following sources of information are used:

- a) Payroll for salaries, national insurance, superannuation and income tax information;
- b) Treasury Management spreadsheet for interest and loans principal payments;
- c) Precept income;
- d) Grant income;
- e) Pensions lump sums;
- f) Police pension account surplus/deficit payments;
- g) Income forecasts;
- h) Creditor payment schedules; and
- i) Capital expenditure programme.

### **8.3 BANK STATEMENT PROCEDURES**

8.3.1 Bank Statements are reconciled against payment and income records on the General Ledger. Finance staff, check all items going through the financial ledger to the Bank Statement and investigate discrepancies. Presented cheque information is also uploaded and recorded against cheques drawn, general ledger and bank statements.

### **8.4 PAYMENT SCHEDULING AND AGREED TERMS OF TRADE WITH CREDITORS**

8.4.1 The policy is to pay creditors within 30 days of the invoice date and this effectively schedules the payments. Certificated payments to sub-contractors must be paid within 14 days.

### **8.5 ARRANGEMENTS FOR MONITORING DEBTORS / CREDITORS LEVELS**

8.5.1 The Purchase to Pay section provides the Accountant with monthly statistics of invoices paid and the percentage paid within 30 days.

### **8.6 PROCEDURES FOR BANKING OF FUNDS**

8.6.1 All money received by officers on behalf of the Commissioner will without unreasonable delay be paid to the Cashier or deposited in the Commissioner's bank accounts. Details are included in the Financial Regulations and Financial Procedures.

### **8.7 PRACTICES CONCERNING PREPAYMENTS TO OBTAIN BENEFITS**

8.7.1 All prepayments must be authorised by the CFO.

## **TMP 9 MONEY LAUNDERING**

### **9.1 STATUTORY REQUIREMENTS**

9.1.1 The Commissioner is not directly required to implement the requirements of the Money Laundering Regulations 2007, but the implications of the Terrorism Act 2000, the Anti-Terrorism, Crime and Security Act 2001 and The Proceeds of Crime Act 2002 place an onus of responsibility on individuals associated with treasury processes to consider its implications. It follows that officers involved in treasury management activities must be alert to the possibility that the Commissioner may become the subject of an attempt to involve him in a transaction involving the laundering of money and aware of their reporting responsibility in those circumstances.

### **9.2 PROCEDURES FOR ESTABLISHING IDENTITY / AUTHENTICITY OF LENDERS**

9.2.1 The Commissioner does not accept loans from individuals. All material loans are obtained through brokers, from other local authorities or from authorised institutions. Receipts will normally be paid by BACS or cheques and the relevant bank will be required to comply with money laundering regulations for their customer. Any cash deposits must without delay be reported to the CFO as the nominated Money Laundering Reporting Officer (MLRO).

### **9.3 METHODOLOGIES FOR IDENTIFYING SOURCES OF DEPOSITS**

9.3.1 In the course of its Treasury activities, the Commissioner will only lend money to or invest with those counterparties that are on his approved lending list.

### **9.4 REPORTING PROCEDURES**

9.4.1 Any person in the organisation having reasonable grounds for suspecting money laundering must report their suspicions without delay to the CFO, as nominated MLRO.

9.4.2 On receipt of a disclosure the MLRO should consider, in the light of all information, whether it gives rise to such knowledge or suspicion.

9.4.3 If the MLRO determines that the information or matter should be disclosed he should do so to the National Crime Agency.

### **9.5 TRAINING**

9.5.1 Relevant employees must be made aware of their responsibilities relating to money laundering and receive appropriate training in recognising and dealing with transactions which may be related to money laundering.

## **TMP 10 TRAINING AND QUALIFICATIONS**

- 10.1** Details of staff and relevant member training needs will be identified as part of the Personal Development Reviews.
- 10.2** Training and training updates will be provided as appropriate on the Treasury Management system.
- 10.3** Treasury Management seminars will be attended as appropriate.
- 10.4** The CFO and Assistant Chief Officer – Resources (ACOR), are committed to professional responsibilities through both personal compliance and by ensuring that relevant staff are appropriately trained.

## **TMP 11 USE OF EXTERNAL SERVICE PROVIDERS**

### **11.1 DETAILS OF CONTRACTS WITH SERVICE PROVIDERS, INCLUDING BANKERS, BROKERS, CONSULTANTS, ADVISERS**

#### **11.1.1 Banking services**

- a) Name of supplier of service is the Lloyds Bank. The branch address is 1 Gwent Square, Town Centre, Cwmbran, NP44 1XN;
- b) Contract commenced in December 2014 and is due to expire on 30<sup>th</sup> July 2019; and
- c) Cost of service is dependent on transaction volumes through the account.

#### **11.1.2 Treasury Management Advisors**

Link Asset Services (formerly known as Capita Asset Services),  
6<sup>th</sup> Floor,  
65 Gresham Street,  
London,  
EC2V 7NQ.

Contract is due to expire on 31<sup>st</sup> March 2019 with an option to extend for 12 months.

#### **11.1.3 Money-broking services**

- a) Martin Brokers (UK) plc;
- b) Tullett Prebon;
- c) Tradition UK Limited;
- d) ICAP; and
- e) BCG Partners.

### **11.2 PROCEDURES AND FREQUENCY FOR TENDERING SERVICES**

See TMP2.

## **TMP 12 CORPORATE GOVERNANCE**

### **12.1 LIST OF DOCUMENTS TO BE MADE AVAILABLE FOR PUBLIC INSPECTION**

- a) Statement of Accounts (PCC Group and Chief Constable);
- b) Annual Budget;
- c) 3 Year Capital Plan;
- d) Treasury Management Strategy;
- e) Mid-Year Monitoring Report(s);
- f) Annual Treasury Report;
- g) Annual Investment Strategy; and
- h) Relevant Decisions of the Commissioner