

Regulation, Audit and Accounts Committee

18 July 2022

Treasury Management Compliance Report – First Quarter 2022/23

Report by Director of Finance and Support Services

Summary

In accordance with treasury management governance arrangements, this report details compliance against planned parameters as approved within the annual Treasury Management Strategy Statement (TMSS).

During the first quarter of 2022/23 the County Council complied with all of the relevant statutory and regulatory requirements related to its treasury management activities. The Director of Finance and Support Services confirms that there were no breaches of the approved TMSS (including the Annual Investment Strategy) during the period.

Recommendation

The Committee is asked to review and comment on the Treasury Management Compliance Report.

Proposal

1. Introduction

- 1.1 The County Council has substantial amounts of investments and borrowings and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice for Treasury Management recommends that members are regularly updated on treasury management activity; this report therefore ensures the County Council is implementing best practice in accordance with the Code.

2. Compliance Report

- 2.1 Throughout the first quarter of 2022/23 the County Council complied with the relevant statutory and regulatory requirements which require officers to identify and where possible quantify the levels of risk associated with its treasury management activities. Additionally, no counterparty that the County Council held investments with during the quarter was negatively impacted by credit rating updates as published by Fitch, Moody's and Standard & Poor's, credit default swap/equity price trends and general media alerts.

2.2 **Borrowing:** On 30 June 2022 the County Council's Public Works Loan Board (PWLB) long-term borrowing for capital purposes totalled £471.3m (no change from 31 March 2022). During the first quarter of 2022/23:

- (a) No new external borrowing (including forward borrowing) for capital purposes was undertaken during the period.
- (b) No external debt rescheduling was undertaken during the period.
- (c) Excluding money held on behalf of the Chichester Harbour Conservancy (and its associated charities) and overdraft facilities with the County Council's main provider of banking services (Lloyds), no short-term borrowing was undertaken for cash flow purposes. The County Council's policy of funding daily cash flow shortages from balances held in short-term Money Market Funds was maintained throughout the period.

2.3 **Investment:** The average level of County Council funds available for treasury investment during 2022/23 (to 30 June) was £440.5m (£428.1m average throughout 2021/22). Actual levels of investments, including cash balances held in the County Council's main Lloyds business bank accounts, amounted to £445m on 30 June 2022 (£442.8m as of 31 March 2022). Cash balances available for investment remain at elevated levels, a consequence of Capital and Revenue funding received ahead of planned spend; including a £13m homes for Ukraine tariff grant received on 30 June 2022.

2.4 UK banking legislation places the burden of rescuing failing banks disproportionately onto unsecured creditors (including local authority investors) through the potential bail-in of unsecured bank deposits. The use of short-term investments (including unsecured bank deposits and Money Market Funds) however remains an integral part of the County Council's treasury management strategy in maintaining adequate cash-flow liquidity. During the first quarter of 2022/23 this included the arrangement of short term investments (up to one year) in UK Government deposits (via the Deby Management Office), financial institution deposits and local authority loans; with liquidity to meet all financial obligations as they arose being maintained in Money Market Funds. As a consequence, the disposition of bank unsecured/other investments on 30 June 2022 as compared with 31 March 2022, is detailed below:

Counterparty Type	Mar-22 £m	Mar-22 %	Jun-22 £m	Jun-22 %
Banks Unsecured (Deposits)	128.6	29.0	134.1	30.2
Short-Term Money Market Funds	118.9	26.9	113.6	25.5
Total Bank Unsecured	247.5	55.9	247.7	55.7
Bank Secured (Deposits)	15.1	3.4	10.0	2.2
UK Government	37.6	8.5	80.1	18.0
UK Local Authority	90.0	20.3	55.0	12.4
Internal Investments	390.2	88.1	392.8	88.3
Externally Managed - Multi Asset	25.8	5.8	24.2	5.4
Externally Managed - Property	26.8	6.1	28.0	6.3
TOTAL INVESTMENTS	442.8	100.0	445.0	100.0

2.5 The full breakdown of the County Council's investment portfolio on 30 June 2022 is shown in **Appendix A**.

- 2.6 In demonstrating compliance with the County Council's creditworthiness policy (as contained within the approved 2022/23 "Annual Investment Strategy") the movement in the investment portfolio (actual cash position) by the credit rating of the financial institution, or the credit rating of the specific investment (for example covered bonds) if higher than the individual counterparty rating, is shown below:

Institution / Investment Credit Rating	Mar-22 £'m	Jun-22 £'m
AAA (i)	134.0	123.6
AA-	77.4	119.9
A+	44.3	49.8
A	44.5	44.5
A-	0.0	0.0
Local Authority (No Rating)	90.0	55.0
Internally Managed	390.2	392.8
Externally Managed	52.6	52.2
Total Investments	442.8	445.0

(i) Includes short-term Money Market Funds and Covered Bonds.

- 2.7 Furthermore, the Director of Finance and Support Services confirms that during the first quarter there were no breaches of the following additional exposure limits as approved within the 2022/23 Annual Investment Strategy, including:

- (a) Up to a maximum of £90m (£30m per individual sovereign) may be invested in non-UK organisations (excluding investments held in short-term Money Market Funds and externally managed pooled funds).

Deposits by Sovereign	Mar-22 £'m	Jun-22 £'m
Australia	24.3	24.7
Canada	14.9	14.9
Finland	9.9	9.9
Netherlands	10.0	10.0
Total Investments on 30 June 2022	59.1	59.5

Total non-UK investments on 30 June 2022 (£59.5m) represents the highpoint of such invested amounts during the first quarter of 2022/23.

- (b) Up to a maximum of £100m may be invested in negotiable instruments (bonds, certificate of deposits etc.) held in a nominated custody account. **Actual:** £94.1m on 30 June 2022 (*being highpoint during the quarter*).
- (c) Up to a maximum of £200m may be invested in short-term Money Market Funds (excluding externally managed pooled funds). **Actual:** £113.6m on 30 June 2022 (*£157.9m highpoint during the quarter*).
- (d) Up to a maximum of £100m may be invested in externally managed pooled funds; of which £60m may be invested in such funds not holding a AAA credit rating. **Actual:** £52.2m total investment on 30 June 2022; all of which is invested in unrated multi-asset income and property funds (*change in fund market valuations being the only movements during the quarter*).

- (e) Up to a maximum of £100m to be made available for long-term strategic investment based on forecast levels of PFI/MRMC reserves (as reported in the County Council's Treasury Indicators). **Actual:** £62.2m on 30 June 2022 *(no new long-term investments arranged during the quarter; but includes £10m Nationwide Building Society covered bond repayable in August 2022 on maturity of this three year investment).*

3. Risk implications and mitigations

- 3.1 Covered in main body of report.

Katharine Eberhart

Director of Finance and Support Services

Contact Officers

Vicky Chuter, Financial Reporting Manager, 033 022 23414

Jon Clear, Treasury Management Officer, 033 022 23378

Appendices

Appendix A – The County Council's investment portfolio on 30 June 2022.

Background Papers

None