



Wiltshire Fire & Rescue Service

Wiltshire and Swindon Fire Authority

Treasury Management Policy Statement & Practices (incorporating TMP Schedules and Annual Investment Strategy)



2011 - 2012

Your Safety: Our Priority

CONTENTS

1	INTRODUCTION	4
1.1	BACKGROUND	4
1.2	TREASURY MANAGEMENT REPORTING.....	4
1.3	DELEGATED RESPONSIBILITY	4
2	TREASURY MANAGEMENT POLICY STATEMENT	5
3	TREASURY MANAGEMENT PRACTICES	5
3.1	INTRODUCTION	5
3.2	TMP1 - RISK MANAGEMENT.....	5
3.2.1	<i>Credit and Counterparty Risk Management</i>	<i>6</i>
3.2.2	<i>Liquidity Risk Management.....</i>	<i>6</i>
3.2.3	<i>Interest Rate Risk Management</i>	<i>6</i>
3.2.4	<i>Exchange Rate Risk Management</i>	<i>6</i>
3.2.5	<i>Refinancing Risk Management.....</i>	<i>6</i>
3.2.5	<i>Legal and Regulatory Risk.....</i>	<i>7</i>
3.2.6	<i>Fraud, Error and Corruption, and Contingency Management</i>	<i>7</i>
3.2.7	<i>Market Risk Management.....</i>	<i>7</i>
3.3	TMP2 - PERFORMANCE MEASUREMENT	7
3.4	TMP3 - DECISION MAKING AND ANALYSIS	8
3.5	TMP4 - APPROVED INSTRUMENTS, METHODS AND TECHNIQUES	8
3.6	TMP5 - ORGANISATION, CLARITY AND SEGREGATION OF RESPONSIBILITIES, AND DEALING ARRANGEMENTS.....	8
3.7	TMP6 - REPORTING REQUIREMENTS AND MANAGEMENT INFORMATION ARRANGEMENTS	9
3.8	TMP7 - BUDGETING, ACCOUNTING AND AUDIT ARRANGEMENTS	9
3.9	TMP8 - CASH AND CASH FLOW MANAGEMENT	10
3.10	TMP9 - MONEY LAUNDERING.....	10
3.11	TMP10 - TRAINING AND QUALIFICATIONS	10
3.12	TMP11 - USE OF EXTERNAL SERVICE PROVIDERS.....	10
3.13	TMP12 - CORPORATE GOVERNANCE	11
4	TREASURY MANAGEMENT SCHEDULES.....	12
4.1	INTRODUCTION	12
	TMP 1 RISK MANAGEMENT.....	12
	<i>Credit and Counterparty Risk Management</i>	<i>12</i>
	<i>Liquidity Risk.....</i>	<i>12</i>
	<i>Interest Rate, Exchange Rate Risk Management</i>	<i>12</i>
	<i>Refinancing Risk Management.....</i>	<i>13</i>
	<i>Legal and Regulatory Risk.....</i>	<i>13</i>
	<i>Fraud, Error and Corruption and Contingency Management</i>	<i>13</i>
	<i>Market Risk Management.....</i>	<i>13</i>
	TMP 2 PERFORMANCE MEASUREMENT	13
	<i>Internally Invested Funds.....</i>	<i>13</i>
	TMP 3 DECISION-MAKING AND ANALYSIS.....	14
	TMP 4 APPROVED INSTRUMENTS, METHODS & TECHNIQUES.....	14
	<i>Internally Managed Funds:</i>	<i>14</i>
	<i>Specified & Non Specified Investments</i>	<i>14</i>
	TMP 5 ORGANISATION, CLARITY AND SEGREGATION OF RESPONSIBILITIES, AND DEALING ARRANGEMENTS.....	16
	<i>The Authority.....</i>	<i>16</i>
	<i>Finance Director.....</i>	<i>16</i>
	<i>Treasury Manager – Principal Financial Accountant).....</i>	<i>17</i>
	<i>Accountancy Assistant).....</i>	<i>17</i>
	<i>Internal Audit (Swindon Borough Council) (as agent to the Authority)</i>	<i>17</i>
	TMP 6 REPORTING REQUIREMENTS AND MANAGEMENT INFORMATION ARRANGEMENTS.....	18
	<i>Finance Director Reporting.....</i>	<i>18</i>
	<i>Treasury Manager - Principal Financial Accountant.....</i>	<i>18</i>

TMP 7 BUDGETING, ACCOUNTING AND AUDIT ARRANGEMENTS	18
<i>Budgeting</i>	18
<i>Accounting Arrangements</i>	19
<i>Audit Arrangements</i>	19
TMP 8 CASH AND CASH FLOW MANAGEMENT	19
<i>Standard Operating Procedures</i>	19
TMP 9 MONEY LAUNDERING	20
TMP 10 TRAINING AND QUALIFICATIONS.....	20
TMP 11 USE OF EXTERNAL SERVICE PROVIDERS	20
<i>Internally Invested Funds</i>	20
<i>Externally Invested Funds (not currently relevant)</i>	21
TMP 12 CORPORATE GOVERNANCE.....	21
 APPENDIX A - ANNUAL INVESTMENT AND TREASURY MANAGEMENT STRATEGY	 21

1 INTRODUCTION

1.1 Background

The Fire Authority has had a formally adopted Treasury Management Policy Statement for a number of years, which has complied with the requirements of the Chartered Institute of Public Finance and Accountancy (CIPFA) "Treasury Management in Local Authorities: Code of Practice 1996".

This code was fully revised in 2001 and updated in 2009 and the purpose of this document is to outline those procedures that cover the whole range of treasury management activities, and has been prepared within the revised guidelines of the "Treasury Management in the Public Services Code of Practice" published by CIPFA. As such, the authority will adopt the key recommendations of the code.

Accordingly, the authority will create and maintain, as the cornerstones for effective treasury management:

- ◆ A treasury management policy statement, stating the policies and objectives of its treasury management activities;
- ◆ Suitable treasury management practices (TMPs), setting out the manner in which the authority will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.

1.2 Treasury Management Reporting

The Authority will receive reports on its treasury management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the year, a mid year statement and an annual report after its close, in the form prescribed in the TMPs.

The Annual Strategy required by this code will also incorporate the requirements of the "Guidance on Local Government Investments" issued by the former Office of the Deputy Prime Minister (ODPM). This document requires that a Local Authority draw up an Annual Investment Strategy for the following financial year.

The Annual Investment Strategy will be produced as Appendix A to this document, and updated and varied from time to time, as appropriate.

1.3 Delegated Responsibility

This Authority delegates responsibility for the implementation and monitoring of its treasury management policies and practices to the Finance Review and Audit Committee and for the execution and administration of treasury management decisions to the Finance Director, who will act in accordance with the Authority's policy statement and TMPs and CIPFA's *Standard of Professional Practice on Treasury Management*.

2 TREASURY MANAGEMENT POLICY STATEMENT

The Authority defines its treasury management activities as:

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

This Authority regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the organisation.

The Authority acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.

3 TREASURY MANAGEMENT PRACTICES

3.1 Introduction

The Code of Practice recommends that an authority adopts a number of Treasury Management Practices (TMPs) to reflect its treasury management powers and the scope of its treasury management activities. The TMPs relevant to Wiltshire and Swindon Fire Authority are outlined in the rest of the section and are supported by the schedules in Section 4, which explain the present arrangements.

The TMPs:-

3.2 TMP1 - Risk Management

The Finance Director will design, implement and monitor all arrangements for the identification, management and control of treasury management risk, will report at least annually on the adequacy/suitability thereof, and will report, as a matter of urgency, the circumstances of any actual or likely difficulty in achieving the authority's objectives in this respect. This will be done in accordance with the procedures set out in TMP6 - *Reporting Requirements and Management Information Arrangements*. In respect of each of the following risks, the arrangements that seek to ensure compliance with these objectives are set out in the schedules to this document.

3.2.1 Credit and Counterparty Risk Management

The Authority regards a key objective of its treasury management activities to be the security of the principal sums it invests. Accordingly, it will ensure that its counterparty lists and limits reflect a prudent attitude towards organisations with whom funds may be deposited, and will limit its investments activities to the instruments, methods and techniques referred to in TMP4 - *Approved Instruments, Methods and techniques* and listed in the schedule to this document. It also recognises the need to have, and will therefore maintain, a formal counterparty policy in respect of those organisations from which it may borrow, or with whom it may enter into other financing arrangements.

3.2.2 Liquidity Risk Management

The Authority will ensure it has adequate, though not excessive cash resources, borrowing arrangements, overdraft or standby facilities to enable it at all times to have the levels of funds available to it which are necessary for the achievement of its business/service objectives.

The Authority 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.

3.2.3 Interest Rate Risk Management

The Authority will manage its exposure to fluctuations in interest rates with a view to containing its interest costs, or securing its interest revenues, in accordance with the amounts provided in its budgetary arrangements as amended in accordance with TMP6 *Reporting requirements and management information arrangements*.

It will achieve these objectives by the prudent use of its approved financing and investment instruments, methods and techniques, primarily to create stability and certainty of costs and revenues, but at the same time retaining a sufficient degree of flexibility to take advantage of unexpected, potentially advantageous changes in the level or structure of interest rates. This should be subject to the consideration, and, if required, approval of any policy or budgetary implications.

3.2.4 Exchange Rate Risk Management

The Authority will manage its exposure to fluctuations in exchange rates so as to minimise any detrimental impact on its budgeted income/expenditure levels.

3.2.5 Refinancing Risk Management

The Authority will ensure that its borrowing, private financing 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 or refinancing, if required, which are competitive and as favourable to the Authority as can be

reasonably achieved in the light of market conditions prevailing at the time.

It will manage its relationships with its 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.

3.2.6 Legal and Regulatory Risk

The Authority will ensure that all of its treasury management activities comply with its statutory powers and regulatory requirements. It will demonstrate such compliance, if required to do so, to all parties with whom it deals in such activities. In framing its credit and counterparty policy under TMP1[1] - *Credit and Counterparty Risk Management*, it will ensure that there is evidence of counterparties' powers, authority and compliance in respect of the transactions they may effect with the authority, particularly with regard to duty of care and fees charged.

The Authority recognises that future legislative or regulatory changes may impact on its treasury management activities and, so far as it is reasonably able to do so, will seek to minimise the risk of these impacting adversely on the organisation.

3.2.7 Fraud, Error and Corruption, and Contingency Management

The Authority will ensure that it has identified the circumstances that may expose it to the risk of loss through fraud, error, corruption or other eventualities in its treasury management dealings. Accordingly, it will employ suitable systems and procedures, and will maintain effective contingency management arrangements, to these ends.

3.2.8 Market Risk Management

The Authority will seek to ensure that its stated treasury management policies and objectives will not be compromised by adverse market fluctuations in the value of the principal sums it invests, and will accordingly seek to protect itself from the effects of such fluctuations.

3.3 TMP2 - Performance Measurement

The Authority is committed to the pursuit of value for money in its treasury management activities, and to the use of performance methodology in support of that aim, within the framework set out in its treasury management policy statement.

Accordingly, the treasury management function will be the subject of ongoing analysis of the value it adds in support of the authority's stated business or service objectives. It will be the subject of regular examination of alternative methods of service delivery, of the availability of fiscal or other grant or subsidy incentives, and of the scope for other potential improvements. The performance of the treasury management function will be measured using the criteria set out in the schedule to this document.

3.4 TMP3 - Decision Making and Analysis

The Authority will maintain full records of its treasury management decisions, and of the processes and practices applied in reaching those decisions, both for the purposes of learning from the past, and for demonstrating that reasonable steps were taken to ensure that all issues relevant to those decisions were taken into account at the time. The issues to be addressed and processes and practices to be pursued in reaching decisions are detailed in the schedule to this document.

3.5 TMP4 - Approved Instruments, Methods and Techniques

The Authority will undertake its treasury management activities by employing only those instruments, methods and techniques detailed in the schedule to this document, and within the limits and parameters defined in *TMP1 Risk Management*.

3.6 TMP5 - Organisation, Clarity and Segregation of Responsibilities, and Dealing Arrangements

The Authority considers it essential, for the purposes of the effective control and monitoring of its treasury management activities, for the reduction of the risk of fraud or error, and for the pursuit of optimum performance, that these activities are structured and managed in a fully integrated manner, and that there is at all times a clarity of treasury management responsibilities.

The principle on which this will be based is a clear distinction between those charged with setting treasury management policies and those charged with implementing and controlling these policies, particularly with regard to the execution and transmission of funds, the recording and administering of treasury management decisions, and the audit and review of the treasury management function.

If and when this authority intends, as a result of lack of resources or other circumstances, to depart from these principles, the Finance Director will ensure that the reasons are properly reported in accordance with *TMP6 - Reporting Requirements and Management Information Arrangements*, and the implications properly considered and evaluated.

The Finance Director will ensure that there are clear written statements of the responsibilities of each post engaged in treasury management, and the arrangements for absence cover. The Finance Director will also ensure that at all times those engaged in treasury management will follow the policies and procedures set out. The present arrangements are detailed in the schedule to this document.

The Finance Director will ensure that there is proper documentation for all deals and transactions, and that procedures exist for the effective transmission of funds. The present arrangements are detailed in the schedule to this document.

The delegations of the Finance Director in respect of treasury management are set out in the schedule to this document. The Finance Director will fulfil all such responsibilities in accordance with the Authority's policy statement and TMPs, and, if a CIPFA member, the "*Standard of Professional Practice on Treasury Management*".

3.7 TMP6 - Reporting Requirements and Management Information Arrangements

The Authority will ensure that regular reports are prepared and considered in the implementation of its treasury management policies; on the effects of decisions taken and transactions executed in pursuit of those policies; on the implications of changes, particularly budgetary, resulting from regulatory, economic, market or other factors affecting its treasury management activities; and on the performance of the treasury management function.

As a minimum, the Authority will receive:-

- ◆ An annual report on the strategy and plan to be pursued in the coming year;
- ◆ A mid year review;
- ◆ An annual report on the performance of the treasury management function, on the effects of the decisions taken and the transactions executed in the past year, and on any circumstances of non-compliance with the Authority's treasury management policy statement and TMPs.

The Finance Review and Audit Committee will receive periodic monitoring reports on treasury management activities and risks, and will have responsibility for the scrutiny of treasury management policies and practices.

The Authority should report the treasury management indicator as detailed in the sector specific guidance notes.

The present arrangements and the form of these reports are detailed in the schedule to this document.

3.8 TMP7 - Budgeting, Accounting and Audit Arrangements

The Finance Director will prepare, and the Authority will approve and, if necessary, from time to time amend, an annual budget for treasury management, which will bring together all the costs involved in running the treasury management function, together with associated income. The matters to be included in the budget will at minimum be those required by statute or regulation, together with such information as will demonstrate compliance with TMP1 - *Risk Management*, TMP2 - *Performance Measurement* and TMP4 - *Approved Instruments, Methods and Techniques*. The Finance Director will exercise effective controls over this budget, and will report upon and recommend any changes in accordance with TMP6 - *Reporting Requirements and Management Information Arrangements*..

The Authority will account for its treasury management activities, for decisions made and transactions executed, in accordance with appropriate accounting practices and standards, and with statutory and regulatory requirements in force for the time being.

3.9 TMP8 - Cash and Cash Flow Management

Unless statutory or regulatory requirements demand otherwise, all monies in the hands of the Authority will be under the control of the Finance Director, and will be aggregated for cash flow and investment management purposes. Cash flow projections will be prepared on a regular and timely basis, and the Finance Director will ensure that these are adequate for the purposes of monitoring compliance with TMP1[1] *Liquidity Risk Management*.

3.10 TMP9 - Money Laundering

The Authority is alert to the possibility that it may become the subject of an attempt to involve it in a transaction involving the laundering of money. Accordingly, it will maintain procedures for verifying and recording the identity of counterparties and reporting suspicions, and will ensure that staff involved in this are properly trained. The present arrangements, including the name of the officer to whom reports should be made, are referred to in the schedule to this document.

3.11 TMP10 - Training and Qualifications

The Authority recognises the importance of ensuring that all staff involved in the treasury management function are fully equipped to undertake the duties and responsibilities allocated to them. It will therefore seek to appoint individuals who are both capable and experienced and will provide training for staff to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills. The Finance Director will recommend and implement the necessary arrangements.

The Finance Director will ensure the Finance Review and Audit Committee members tasked with treasury management responsibilities, including those responsible for scrutiny, have access to training relevant to their needs and their responsibilities.

Those charged with governance recognise their individual responsibility to ensure that they have the necessary skills to complete their role effectively.

The present arrangements are detailed in the schedule to this document.

3.12 TMP11 - Use of External Service Providers

The Authority recognises the responsibility for treasury management decisions remains with the Authority at all times. It recognises the

potential value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. When it employs such service providers, it will ensure it does so for reasons which have been submitted to a full evaluation of the costs and benefits. It will also ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review. And it will also ensure, where feasible and necessary, that a spread of service providers is used, to avoid over-reliance on one or a small number of companies. Where services are subject to formal tender and re-tender arrangements, legislative requirements will be observed. The monitoring of such arrangements rests with the Finance Director, and details of current arrangements are set out in the schedule to this document.

3.13 TMP12 - Corporate Governance

The Authority is committed to the pursuit of proper corporate governance throughout its business and services, and to establishing the principles and practices by which this can be achieved. Accordingly, the treasury management function and its activities will be undertaken with openness and transparency, honesty, integrity and accountability.

This Authority has adopted and has implemented the key principles of the Code. This, together with the other arrangements detailed in the schedule to this document, is considered vital to the achievement of proper corporate governance in treasury management, and the Finance Director will monitor and, if and when necessary, report upon the effectiveness of these arrangements.

4 TREASURY MANAGEMENT SCHEDULES

4.1 Introduction

The schedules outlined in this section present the current arrangements in place at Wiltshire and Swindon Fire Authority, in respect of its treasury management function. They are provided in support of the treasury management practices (TMPs) outlined in Section 3.

TMP 1 Risk Management

Credit and Counterparty Risk Management

Key schedules/points of reference:

- i) Approved lending list 2011/12
- the lending list is agreed annually as part of the Annual Investment Strategy and since the current banking system failures is reviewed periodically throughout the year. It lists financial institutions with which W&SFA can invest funds. The institutions included on the list are split into different ranges of maximum investment, in accordance with their credit ratings.

Liquidity Risk

Key schedules/points of reference:

- i) Schedule of Known Payments and Receipts 2011/12
- compiled at the beginning of the year and updated through the year for any changes to the cashflow, including investments fixed to dates where known payment must be made.
- ii) Weekly Cashflow Forecast
- completed on a daily basis with bank balance figures taken from HSBC and known payments and receipts for that day. Action is then taken to either invest or recall funds depending on whether there is a surplus or a shortfall of funds.
- iii) Overdraft Arrangement
- the Authority has an authorised overdraft limit of £50,000 with an interest rate chargeable of 2.5% above base rate up to £50,000, and an additional 1% (3.5% above base rate) for amounts in excess of £50,000.

The Authority 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.

Interest Rate, Exchange Rate Risk Management

Key schedules/points of reference:

- i) Budgeted investment income and reserves 2011/12

- ii) Bank charges budget (incl. Interest) 2011/12
- iii) Prudential Indicators for 2011/12

Refinancing Risk Management

The prudential code is designed to assist authorities avoid large concentrations of fixed rate debt that has the same maturity and would therefore need to be replaced at the same time. Limits have therefore been established for debt maturity, with the overall aim to achieve, as far as possible, a flat maturity structure over the long term.

Key schedules/points of reference include the debt maturity profile i.e. maturity structure of fixed rate borrowing during 2011/12.

Legal and Regulatory Risk

There are no specific schedules for this item.

Fraud, Error and Corruption and Contingency Management

Key schedules/points of reference:

- Insurance Policy documents detailing the Fidelity Guarantee Insurance Policy

Market Risk Management

There are no key schedules for this risk

TMP 2 Performance Measurement

Internally Invested Funds

A spreadsheet is kept which details the daily outstanding investments and the Local Authority Seven-Day Rate.

The target for returns on internal investments is therefore the average daily interest receivable, using the average Local Authority Seven-Day rate for a period.

Funds are monitored on a quarterly basis in a report to the Finance Director, from the Principal Financial Accountant.

TMP 3 Decision-making and Analysis

On a daily basis a cashflow forecast is completed, taking bank balance figures from HSBCnet and any known payments and receipts for each day.

At the end of each week, the cashflow forecast is printed as a record of the cashflow and investment decisions taken in that week. Once printed, the cashflow forecast spreadsheet is overwritten with the following week's entries.

As a general rule, a small balance is maintained in the current account to cover unexpected payments, such as advances on payroll, which may arise at any time. This avoids the need to make minor recalls on investment sums. In a climate of very low interest rates, the loss of interest is negligible, compared with the potential costs of going overdrawn. If interest rates rise, a deposit account is available for small sums of this nature.

However, it must be borne in mind that to invest smaller sums will cost the Authority more in CHAPS fees than it would receive in investment interest.

TMP 4 Approved Instruments, Methods & Techniques

The TMP should be read in conjunction with the Annual Investment and Borrowing Strategy, a copy of which is attached as Appendix A.

A financial instrument is any contract which gives rise to a financial asset in an entity and financial liability or equity instrument of another, in the context of treasury management referred to as investments and borrowings.

The Authority can use a large variety of financial instruments for its investments and borrowings, which allow us to actively manage our interest rate exposures and to reduce interest costs. The Authority, at this current time chooses not to use many instruments, methods and techniques such as Gilts, Treasury Deposits, Derivatives (Swaps, Forwards, Options), as the level of cash available for investment or the risks associated does not warrant such use. The instruments, methods and techniques adopted should such cash investment opportunities become available would be under the advice of external advisers (see TMP11 – The Use of External Providers).

Internally Managed Funds:

Specified & Non Specified Investments

The Authority may use the following types of investment for internally managed investments:

Fixed Term Deposits

On Call Deposits

Definition of Approved Organisations for Investment

The Authority may lend funds to the following organisations:

Other Local Authorities;
Major clearing banks incorporated in the UK and their subsidiaries;
UK Building Societies;
British Merchant Banks and Securities House Association members;
The secondary banking sector.
Foreign Banks with an F1+ Rating

With the exception of Other Local Authorities, the Authority may invest with these bodies to the extent that they have “high” credit ratings¹, which have been defined by the Authority in the following section.

Internal Investment Policy

The following limits apply on the amount of money that can be invested with any one of the institutions mentioned in 2.4 above at any one time, by the internal team:

Highest Quality Financial Institutions	£5m
Other Local Authorities	£1m
100% Owned Subsidiaries of Clearing Banks	£1m
F1/A Rated Top 10 Building Societies	£1m
F1/A Rated Building Societies	£0.5m
F1/A Rated Merchant or Secondary Banks	£0.5m

The highest quality financial institutions must have a minimum short-term Fitch IBCA rating of F1+ and long-term rating of AA-. This criterion is used in conjunction with the lending lists maintained by the fund managers and only institutions on these lists will be used.

The Authority shall review the above list of institutions and limits attached thereto on an ongoing basis, at least annually as part of the overall strategy review. Authority is delegated to the Finance Director to vary the list and the limits applying as circumstances dictate, such variations to be reported to the Authority at the earliest opportunity. Counter party risk assessment is carried out through media review, alongside the Fitch IBCA ratings.

Borrowing

The uncertainty over future interest rates increases the risks associated with treasury management activity. As a result the Authority will take a cautious approach to its treasury management strategy.

¹ Draft “Guidance on Local Government Investments”

Long term fixed interest rates are at risk of being higher over the medium term. The Finance Director, 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. It is likely that short term fixed rates may provide better opportunities. This may include borrowing in advance of anticipated future requirements.

The option of postponing borrowing and running down investments balances will also be considered. This would reduce counterparty risks and hedge against expected fall in investment rates.

The Authority's policy is to raise finance only from the following:-

- Public Works Loan Board
- Market Temporary
- Overdraft
- Internal Capital Receipts and Balances
- Leasing

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

The Authority's treasury management function is managed with the Service headed by the Finance Director. The various responsibilities of the treasury management function shall be allocated as follows:

The Authority

- Approval of the initial Treasury Management Policy Statement & Practices
- Determination of the annual borrowing limit, the annual temporary borrowing limit, and the maximum level of borrowing on which variable interest is payable
- Approval of amendments to and reviews of the Authority's adopted clauses, Treasury Management Policy Statement and Practices
- Budget consideration and approval
- Agreement of the annual treasury management strategy
- Annual review of treasury management activity
- Agreement of the division of treasury management responsibilities

Finance Director

- Variations to approved investment institutions and associated lending limits
- Approval of leasing transactions and other credit arrangements
- Approval of all longer-term borrowing and lending transactions (over 364 days).
- Obtaining confirmation of the legality of proposed actions and instruments to be obtained

- Report to elected members and advise the monitoring officer when appropriate
- Review and amendments of the treasury management strategy and policy statement for approval by Finance Review & Audit Committee
- Organisation of the treasury management function
- Approval of the use of all new brokers
- Monitoring and implementation of the treasury management policy and strategy reports to Finance Review & Audit Committee on future treasury management strategies and performance reviews
- Review of the performance of the treasury management function
- Regular review of the treasury management systems documentation
- Ensuring that all treasury management staff are aware of and have access to a copy of the Bank of England's latest version of the "London Code of Conduct".
- Ensure compliance with policies, limitations and directions
- Manage the overall treasury management function
- Ensure appropriate division of duties

Treasury Manager - Principal Financial Accountant

- Execution of transactions
- Adherence to agreed policies and practices on a day-to-day basis
- Maintaining relationships with third parties and external service providers
- Supervising treasury management staff
- Monitoring performance on a day to day basis
- Submitting management information reports to the responsible officer
- Identifying and recommending opportunities for improved practices
- Produce regular performance reports to the Finance Director
- Monitor the performance of brokers and recommend new ones as appropriate
- Prepare and implement the treasury management systems documentation

Accountancy Assistants

- To carry out the daily cashflow forecast and arrange any investment or recalling of funds as necessary
- To perform monthly reconciliations of treasury management records with the information recorded on the General Ledger in Agresso
- To assist the Treasury Manager with other general treasury management duties
- To obtain and record regular reports of interest rates for borrowing and investments

Internal Audit (Swindon Borough Council) (as agent to the Authority)

- Review compliance with approved policies and procedures
- Review division of duties and operational practice
- Undertake probity audit of the treasury management function

TMP 6 Reporting Requirements and Management Information Arrangements

Finance Director Reporting

Exception reporting – The Finance Director will report to Authority and the Authority’s Monitoring Officer if irregularities occur which require this.

Prudential Indicator Report - The Finance Director should recommend borrowing limits required by Local Government Act 2003 and the Prudential Code of Practice, to the Authority in time to enable these matters to be approved by Authority prior to the commencement of the relevant financial year.

Annual Treasury Management Strategy Report - The Finance Director should report to the Authority before each year on the proposed treasury management strategy for the ensuing year.

Annual Report on Treasury Management - The Finance Director should report on the activities of the treasury management function by 30th September after the year-end of the year in question. This report will include reference to the original strategy, and a comparison of performance. A mid-year review should also be undertaken and reported.

Exceptional Items - The Finance Director should also report on any other unusual treasury management activity, and on any changes made to the strategy, or to other items of policy brought about by exceptional circumstances.

Treasury Manager – Principal Financial Accountant

The Principal Financial Accountant will be responsible for the preparation of quarterly monitoring statements for the Finance Director including loans and investments made, interest rate movements, treasury management activities in general and recommendations for the ensuing quarter. The report will also include any unusual items or concerns.

TMP 7 Budgeting, Accounting and Audit Arrangements

Budgeting

As part of the annual budget setting process, budgets for investment interest and bank charges are set.

Accounting Arrangements

The accounting arrangements in place for the treasury management function have been constructed in accordance with the Local Authority Statement of Recommended Practice (SORP). Also, in accordance with the latest Best Value Accounting Code of Practice (BVACOP) the following codes are in place on the Authority's main accounting system (Agresso):-

Account	Cost Centre Detail	Description
9400	900	Short Term Investments
7009	506	Interest on Treasury Deposits

Audit Arrangements

The Authority has an annual internal audit strategy and Plan, which is managed and implemented by agreement by Swindon Borough Council. The treasury management function is considered to be a high-risk area and is therefore audited on an annual basis.

Internal Audit reports on treasury management will be issued to the Finance Director and Principal Financial Accountant, and will be reported through to the Senior Management.

TMP 8 Cash and Cash Flow Management

Standard Operating Procedures

Standard operating procedural documentation detailing the operational procedures and responsibilities are maintained (reviewed regularly) and are readily accessible to all relevant staff within Wiltshire Fire & Rescue Service. These include:-

- Obtaining bank balances off HSBCnet
- Preparing the Daily Cashflow Forecasts
- Making Investments
- Recalling Investments
- CHAPS Payments
- Reconciling Investments
- Constructing the Quarterly Report

TMP 9 Money Laundering

The Authority's Anti-Fraud and Corruption Strategy contains a section relating to money laundering and the controls in place to prevent this at Wiltshire and Swindon Fire Authority.

TMP 10 Staff Training and Qualifications/Experience

Staff currently involved in the treasury management function have the following relevant qualifications:-

Position	Name	Qualifications
Finance Director	Phil Chow	BSc, CPFA
Principal Financial Accountants	Martin Platt/Samantha Harris	MA, CPFA/CPFA
Accountancy Assistant	Mavis Maulkerson	
Accountancy Assistant	Kath Fry	AAT (Intermediate)
Financial Systems Manager	Graham Howard	BA, CIMA(part)

TMP 11 Use of External Service Providers

Internally Invested Funds

Policy on the use of Brokers

The Authority employs a number of brokers who must demonstrate adherence to the London Code of Conduct for principals and broking firms.

The policy is to use at least three firms to promote competitiveness and allow comparisons of service provided, and to avoid any accusations of favouritism. The firms most commonly used by the Authority at present are as follows:

- Tullett Prebon
- ICAP Plc
- Tradition UK

Due to the frequency of use of brokering i.e. very little, the selection criteria for selecting brokers is limited. Current instructions are to use brokers in turn. They will be reviewed based on performance and if a broker's service falls short of expected standards, or gives grounds for concern, then a new broker will be substituted. Due to the infrequency of use of brokering there is negligible gains to be made by operating a more selective criteria based process.

Policy on Dealing Direct

The Authority will not only deal through Brokers. In some instances the Authority will deal with organisations directly with the expectation that better rates will be achieved by dealing in this way.

Externally Invested Funds (Not currently relevant)

Fund Managers General

The Authority may use external fund managers should the level of funds available for investment become too large for the in-house appointed staff to manage. No one fund manager will have funds greater than £20M at the time funds are placed and the performance of the managers will be reviewed at least every 3 years.

The objective of the funds managed by external fund managers would be to achieve a maximum rate of return consistent with minimum capital risk.

Fund managers will agree to be bound by the Authority's Treasury Management Policy Statement unless the Authority determines to alter the Treasury Management Policy Statement on their advice.

Fund Manager Performance Review

Fund Managers performance will be judged against a set standard return based on market rates, and regular reports would be made to the Finance Director who would report the results annually to the Authority, or more often when exceptional circumstances require this.

Fund Manager Selection Process

The process of selection of Fund Managers will involve the creation of a long-list, with responses to an Expression of Interest Questionnaire being used to reduce this number to a shortened long-list. Following presentations to officers, a final short-list will be produced, and candidates will be expected to carry out presentations to Members after which final selection will be made.

TMP 12 Corporate Governance

There are no specific schedules for this item. All other schedules for TMPs 1 to 11 are in place to ensure proper corporate governance within the treasury management function of the Authority.

**WILTSHIRE AND SWINDON FIRE AUTHORITY
ANNUAL INVESTMENT & TREASURY MANAGEMENT
STRATEGY 2011/12**

1. INTRODUCTION

When deciding the treasury management policies and strategies, the Authority will give priority to the security and liquidity of the investments, rather than to the yield of the investments. The general policy objective is that the authority should prudently invest the temporarily surplus funds held on behalf of the community. The strategy laid down in this document has been prepared in accordance with these objectives.

The strategy will also be consistent with Authority's Treasury Management Statement and in particular, TMP 4 - Approved Investments, Methods and Techniques.

The strategy has been prepared with due regard to:-

- The Local Government Act 2003 and regulations made under the Act;
- CIPFA Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes; and,
- CIPFA Prudential Code for Capital Finance in Local Authorities

The strategy should be read in conjunction with TMP 4 - Approved Investments, Methods and Techniques, which explicitly outlines those types of investment that may be used, the organisations that may be used and also details the Authority's definition of "*high credit rating*". The Authority has adopted a policy whereby the definition of "*high credit rating*" differs between those investments managed internally and those managed externally.

The strategy provides details on the expected activity of the treasury management function in the financial year 2011/12. The production and submission of the strategy is a requirement of the Authority's treasury management policy statement.

The strategy covers:-

- Investments
- Borrowing
- Prospects for interest rates
- Prudential Indicators and limits to activity

2. INVESTMENT STRATEGY

2.1 Specified Investments

Specified Investments are those investments made either with the UK Government or other UK Local Authority, or with a body that has been awarded a high credit rating. In addition, the investment must have a period to maturity of no longer than 1 year. Specified investments exclude the acquisition of share capital or loan capital in a body corporate (e.g. Corporate Bonds).

Those funds managed and invested internally by the Authority may only be invested in Specified Investments and in line with the requirements of TMP 4 - Approved Investments, Methods and Techniques.

The Authority may use the following categories of investment (where the maturity is for no longer than 1 year):

- Fixed Term Deposits
- On Call Deposits

These investments may be made with the following organisations:

- Other UK Local Authorities
- Major Clearing banks incorporated in the UK and their subsidiaries
- UK Building Societies
- British Merchant Banks and Securities House Association Members
- The Secondary Banking Sector
- Foreign Banks

TMP 4 - Approved Investments, Methods and Techniques provides details of the credit ratings that each of these organisations must have in order for the Authority to invest with them.

The Authority may also use the UK Government (such as the Debt Management Office, UK Treasury Bills or Gilts with less than one year to maturity) under advice from externally appointed specialists.

2.2. Non Specified Investments

Non-specified investments are those investments which do not meet the criteria for specified investments. In particular, this would include investments with a maturity of more than one year.

In deciding which categories of non-specified investments the Authority may prudently use, the following procedures should be used:-

- a) Seek the advice of the Authority's externally appointed specialists;
- b) Evaluate the category of investment with regard to the Authority's policy of maximising the security and liquidity of its investments.

- c) Make recommendations based on the information obtained in a) and b), to Members, agree that the category of investment may be added to the list of non-specified investments that may be used by the Authority.

2.3 Liquidity of Investments

The Authority acknowledges the importance of the liquidity of its investments when determining its investment strategy. Therefore, the following guidelines have been agreed:

- All internally managed funds (100%) are to be invested in specified investments that have a period to maturity of no more than 1 year;

In determining the liquidity guidelines of the Authority's investments, the following points should be borne in mind:-

- The cash flow requirements of the authority
- Is the category of investment negotiable (i.e. can it be freely bought and sold on the markets)

2.4 Internal Managed Investments – Cash Flow Management

The Authority's Internal Investment Strategy for the forthcoming twelve months is as follows:

- To invest surplus funds, in specified investments, to achieve maximum liquidity and security and minimum risk.
- To invest the Authority's surplus funds to achieve maximum returns whilst fulfilling short-term cash flow requirements.

3. BORROWING STRATEGY

3.1 Short Term Borrowing Strategy

The Authority's strategy for the forthcoming twelve months will be as follows:

- The Authority will only borrow short-term (up to twelve months) for the purpose of maintaining sufficient cash flow.
- The limit set on the total amount of outstanding borrowing at any time in 2011/12 will be an Operational Boundary of £10.561m and an Authorised Limit of £10.611m.

3.2 Long Term Borrowing Strategy

Long term borrowing costs have been higher than the investment income rates over the past year and are forecast to be so for the next few years. Officers have therefore given due consideration to a strategy of avoiding external borrowing and using internal borrowing where surplus funds are

made available. This strategy has eased pressure on the revenue budget and reduces exposure to credit risk.

The Authority's strategy for the forthcoming twelve months will be as follows:

- To carry out long-term borrowing for the purposes of financing capital expenditure, as approved by the Authority. However, the Authority may consider using financing means other than operating leases in respect of its vehicle replacement policy (this may mean that such funding is classified as borrowing for the purposes of the Prudential Code of Practice).
- The limit set on the total amount of outstanding borrowing at any time in 2011/12 will be an Operational Boundary of £10.561m and an Authorised Limit of £10.611m.

The Authority 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.

4. PROSPECTS FOR INTEREST RATES

Based on current known base rate plus information from other sources, an estimate of the base rate and trend over the year is as follows:

	Base Rate %
March 11	0.75
June 11	0.75
Sept 11	1.00
Dec 12	1.00
March 12	0.25

4.1 Interest Rate Exposure

The net interest rate exposure for the forthcoming twelve months will be as follows:

Upper Limit – Fixed Rates	100%
Upper Limit – Variable Rates	10%

5. PRUDENTIAL INDICATORS 2010/11 to 2012/13

Under the Local Government Act 2003 and the Prudential Code for Capital Finance in Local Authorities, local authority capital spending and its borrowing to fund that spending is limited by what is affordable, prudent and sustainable.

The CIPFA Prudential Code sets out a number of indicators that enables the authority to assess affordability and prudence. The prudential indicators that relate to treasury management in the public services are:-

- Adoption of the CIPFA Code of Practice for Treasury management in the Public Services
- Upper Limits for Fixed Rate Exposure and Variable Rate Exposure
- Limits on Maturity Structure of Borrowing
- Values of Principal Sums invested

5.1 Authorised Limit & Operational Boundary

In addition to this, the Prudential Code requires that the total external debt does not exceed the Authorised Limit for external debt and only exceeds the Operational Boundary for external debt temporarily on occasions due to variation in cash flow.

	2011/12 £m	2012/13 £m	2013/14 £m
The Authorised Limit :-			
- for borrowing	10.622	11.121	11.256
- for other long term liabilities	<u>0.773</u>	<u>0.690</u>	<u>0.603</u>
	11.395	11.811	11.859
The Operational Boundary is:-			
- for borrowing	10.572	11.071	11.206
- for other long term liabilities	<u>0.773</u>	<u>0.690</u>	<u>0.603</u>
	11.345	11.761	11.809

Performance will be measured against these limits periodically, and where necessary be reported to members should the limits be breached or require amendment.

5.2 CIPFA Code of Practice for Treasury Management in the Public Services.

The Authority has adopted and complies with the CIPFA Code of Practice for Treasury Management in the Public services by putting in place a policy which makes it clear that the control of risks is a prime objective and also clearly endorses the importance of the pursuit of Best Value and the measurement of performance.

5.3 Interest Rate Exposure

The code identifies two indicators that will provide the operational boundaries to exposure to interest rate risks, namely:-

- Upper Limits for Variable Interest Rate Exposure; and,
- Upper Limits for Fixed Rate Interest Rate Exposure.

These have been set with reference to outstanding net principal sums

2011/12 £m	2012/13 £m	2013/14 £m
---------------	---------------	---------------

Net projected principal outstanding on borrowing at 1 st April	8.872	9.871	10.346
Net projected principal investments at 1 st April	1.197	1.197	1.197
Net principal outstanding	7.675	8.674	9.149

The following exposure limits are adopted:-

- Fixed Interest Rate 100%
- Variable Interest Rate 10%

Upper Limit – Fixed Rate Exposure (100%)	7.675	8.674	9.149
Upper Limit – Variable rate Exposure (10%)	0.768	0.867	0.915

Effective Rates within which Interest Rate Exposure will be managed:

Fixed Rates	90% to 100%
	£m £m
2011/12	6.908 to 7.675
2012/13	7.807 to 8.674
2013/14	8.234 to 9.149

Variable Rates	0% to 10%
	£m £m
2011/12	0.000 to 0.768
2012/13	0.000 to 0.867
2013/14	0.000 to 0.915

5.4 Maturity Structure of Borrowing

This is an indicator on longer term interest rate exposure, the amount of projected borrowing that is fixed rate maturing in each period as a % of the total projected borrowing that is fixed rate.

Estimated Maturity Structure as at 1st April

	2011/12 £m	2011/12 %	2012/13 £m	2012/13 %
Under 12 mths	0.701	8	0.725	7
12 mths and within 24 mths	0.620	7	1.154	12
24 mths and within 5 yrs	2.503	28	2.397	24
5 yrs and within 10 yrs	3.453	39	3.663	37
10 yrs and above	1.595	18	1.932	20
Total Borrowing	8.872	100	9.871	100
	2013/14 £m	2013/14 %		
Under 12 mths	1.234	12		

12 mths and within 24 mths	1.066	10
24 mths and within 5 yrs	3.052	30
5 yrs and within 10 yrs	3.540	34
10 yrs and above	1.454	14
Total Borrowing	10.346	100

The Maturity Structure of Borrowing – Upper and Lower Limits

	Upper Limit %	Lower Limit %
Under 12 mths	15	0
12 mths and within 24 mths	15	0
24 mths and within 5 yrs	40	0
5 yrs and within 10 yrs	50	15
10 yrs and above	50	15

5.5 Principal Sums invested greater than one year

The Authority's strategy is to not to invest any funds for a period greater than one year.

5.6 Capital Financing Requirement (CFR)

The capital financing requirement (CFR) measures the Authority's underlying need to borrow for a capital purpose. In accordance with best practice, the Authority does not associate borrowing with particular items of capital expenditure. An analysis of the capital financing requirement is given below:-

	2010/11 £m	2011/12 £m	2012/13 £m	2013/14 £m
CFR at 1 April (start of year)	8.377	10.436	11.658	12.255
Capital Expenditure Financed by:				
Supported Borrowing	0.700	0.000	0.000	0.000
Grants/Receipts	0.808	1.100	1.100	1.100
Unsupported Borrowing to 12yrs	0.126	0.982	0.803	0.610
Unsupported Borrowing 12+ yrs	1.601	0.736	0.373	0.235
Total Capital expenditure	3.235	2.818	2.276	1.945
Less:				
Capital Receipts applied	0.000	0.000	0.000	0.000
Capital Grants applied	-0.808	-1.100	-1.100	-1.100
Statutory Charge to Revenue	-0.368	-0.496	-0.579	-0.641
CFR at 31 March (end of year)	10.436	11.658	12.255	12.459