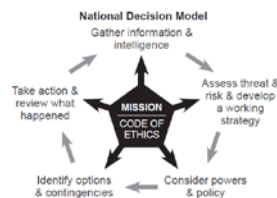




Treasury Management Policy Statement and Strategy

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Version:	n/a
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ACPO / Strategic Lead:	PCC
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What are the Policing Principles?

- Accountability
- Integrity
- Openness
- Fairness
- Leadership
- Respect
- Honesty
- Objectivity
- Selflessness

1. Purpose of Report

This report presents the updated Treasury Management Policy Statement and Strategy 2019/20, to replace the previous strategy.

2. Summary

The Prudential Code requires the Police and Crime Commissioner (PCC) to approve a Treasury Management Strategy. In accordance with the CIPFA Code of Practice on Treasury Management, this strategy is based upon CIPFA's key recommendations, suggested policy statement and 12 treasury management practices.

The attached strategy is updated annually to reflect working practices for the PCC and any changes in legislation. There have been no significant changes since the previous strategy was approved.

3. Recommendations

The Joint Audit Committee is asked to note the contents of this report.

Treasury Management Strategy

1. Introduction

- 1.1 This strategy document has been prepared with due regard to the CIPFA Prudential Code 2017, the CIPFA Code of Practice on Treasury Management 2017 and guidance issued by the Department for Communities and Local Government in relation to section 15(1)(a) of the Local Government Act 2003.
- 1.2 Its purpose is to set out a medium to long term strategy for investment of surplus funds and borrowing activities for the PCC. It identifies the risks and opportunities encompassed in those activities and, provides guidance for day to day decision making in these areas. In practice, these functions are carried out by SCC and therefore this document mirrors their strategy.
- 1.3 In accordance with *the CIPFA Code of Practice* on Treasury Management, this strategy is based upon CIPFAs key recommendations, suggested policy statement and 12 treasury management practices (TMPs), see Appendix A.

2 Reporting Requirements

2.1 Capital Strategy

The CIPFA revised 2017 Prudential and Treasury Management Codes require, for 2019/20, all local authorities to prepare an additional report, a capital strategy report, which will provide the following:

- A high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services.
- An overview of how the associated risk is managed
- The implications for future sustainability.

The aim of the capital strategy is to ensure that the PCC fully understands the overall long term-term policy objectives and resulting capital strategy requirements, governance and procedures and risk appetite. This document is separate to the Treasury Management Strategy and was approved by the PCC at the Performance Meeting on 12 April 2019.

2.2 Treasury Management reporting

The PCC is required to review/approve, as a minimum, the following reports each year, which incorporate a variety of policies, estimates and actual outturn.

- 1) PCC will approve an annual Treasury Management Strategy and the Prudential and Treasury Management indicators. This covers:
 - the capital plans, including prudential indicators;
 - the minimum revenue provision (MRP) policy showing how residual capital expenditure is charged to revenue over time;
 - the treasury management strategy which shows how the investments and borrowings are to be organised, including treasury indicators and
 - an investment strategy stating the parameters on how investments are to be managed.
 - PCC will approve borrowing limits and other prudential indicators
 - PCC will review six monthly reports (annual and mid-year) on activities and performance of the Treasury Management function

3 Treasury Management Policy Statement

The Office of the Police and Crime Commissioner defines its treasury management activities as:

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

3.1 Risk appetite

The appetite for risk is low. A premium is placed on the security of capital in terms of investment and on the maintenance of financial stability in terms of the costs of borrowing.

3.2 Risk management

The monitoring and control of risk is considered to be the prime criteria by which the effectiveness of treasury management activities will be measured.

3.3 Value for money

The PCC is committed to the principle of achieving best value in treasury management. Although returns on investment remain low, this is offset by the competitive cost of the treasury management service provided by Surrey County Council (SCC).

3.4 Borrowing

The PCC has taken out a loan with PWLB as at March 2019 in support of the Building the Future project along with funding the proposed capital programme.

The PCC has various options for financing borrowing, this is likely to be achieved through a mixed of internal and Public Work Lending Board (PWLB) borrowing. The main objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required.

4 Current Arrangements

4.1 The PCC has a Service Level Agreement (SLA) with SCC to perform the treasury management function on behalf of the PCC therefore the treasury management strategy mirrors their strategy (see 5 below).

4.2 Since 1st January 2019, Orbis took over the Treasury Management function, they are a shared services partnership with Brighton and Hove City Council, East Sussex County Council and Surrey County Council, perform the day to day treasury management operations within the SLA agreement whereby cash balances are monitored on the PCC's behalf and they aggregate any PCC surpluses with their own for investment in the money market and pay interest to the PCC based on their quarterly borrowing rate.

4.3 SCC's appetite for risk in terms of its treasury management activities is low/medium. A premium is placed on the security of capital in terms of investment. A major external influence on the Authority's treasury management strategy continues to be the UK's progress negotiating its exit from the European Union.

4.4 SCC use specific credit ratings to determine which institutions can be used for investments.

- For specified investments, an institution will require the highest short-term credit rating from at least one of the three main credit rating agencies.
- SCC does not expect to make any investments denominated in foreign currencies, nor any that are defined as capital by legislation, such as company shares. Non-specified investments are therefore limited to long-term investments (those that are due to mature 12 months or longer from date of arrangement).

The relevant points from the SCC Strategy for the PCC are:

- 4.5 The primary consideration governing the Council's investment strategy is to invest its funds prudently and to have regard to the security and liquidity of its investments before seeking optimal rate of return or yield and to strike a balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the aim is to achieve a total return that is equal or higher than the prevailing rate of inflation in order to maintain the spending power of the sum invested.

5 Surrey County Council Investment Strategy 2019/20

- 5.1 Due to the continuation of the Council's strategy to maximise internal borrowing and use short term borrowing to manage cash flow shortfalls, investment levels are expected to remain low during 2019/20. The majority of cash balances continue to be invested in money market funds and short-term unsecured bank deposits. Money Market Funds offer same-day liquidity, very low or no volatility and also ensure diversification to reduce the security risk of holding the majority of cash deposits with a limited number of UK banks.
- 5.2 The Council has a cash limit of £25m per counterparty/fund. Cash will always be split over at least 2 funds with different managers to ensure that liquid funds are always available and risk of default is minimised.
- 5.3 Following the increase in the Bank Rate to 0.75% in August 2018, the Council's treasury management advisor Arlingclose is forecasting two more 0.25% hikes during 2019 to take official interest rates to 1.25% by the end of the year.

The full SCC Treasury management Strategy Statement can be viewed at:

<https://mycouncil.surreycc.gov.uk/documents/s54490/Item%206%20-%20TMSS%202019-20.pdf>

6 Regulatory Changes

- 6.1 Following the significant changes to regulations on local authority treasury management in 2017/18, there were very few changes for the year ending 31 March 2019. The main change was the introduction of International Financial Reporting Standards (IFRS 9) – Financial Instruments.
- 6.2 The PCC for Surrey surplus funds are pooled overnight with Surrey County Council and as the PCC is able to access those funds immediately upon

request, they are treated as Cash and Cash Equivalents. There is minimal risk attached to these funds therefore no impairment assessment is carried out.

Background papers:

CIPFA: The Prudential Code

CIPFA: The Prudential Code, Guidance Notes

Local Government Act 2003

Surrey County Council: Treasury Management Strategy

CIPFA Treasury Management in Public Services – 2017 Edition

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Police and Crime Commissioner for Surrey

Treasury Management Practices (TMP)

2019 to 2022

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March 2019

Introduction

The objectives set out in the policy statement can be achieved through the adoption of CIPFA's 12 treasury management practices (TMPs), which deal in some detail with the following issues:

- TMP1 Risk management
- TMP2 Performance management
- TMP3 Decision making and analysis
- TMP4 Approved instruments, methods and techniques
- TMP5 Organisation, clarity and segregation of responsibilities, and dealing arrangements
- TMP6 Reporting requirements and management information arrangements
- TMP7 Budgeting, accounting and audit arrangements
- TMP8 Cash and cash flow management
- TMP9 Money laundering
- TMP10 Training and qualification
- TMP11 Use of external service providers
- TMP12 Corporate governance

1.1 Risk Management (TMP1)

1.1.1 Liquidity

Purpose: To avoid the risk that cash will not be available when it is needed, that ineffective management of liquidity creates additional unbudgeted costs, and that the PCC's police and crime plan will be compromised.

Current arrangements

Approved minimum cash balances	£0
Approved minimum short-term investments	£0

Bank overdraft arrangements:

Net overdraft, in case of need	£20k
Government Procurement Cards, issue of cards	£1m
BACS (payment of salaries) (1 day credit arrangement)	£10m

Currently, day-to-day cash balances are monitored on our behalf under a service level agreement with Surrey County Council. They aggregate any PCC surpluses with their own for investment in the money market and pay interest to the PCC based on their quarterly internal borrowing rate.

1.1.2 Interest rate

Purpose: To avoid the risk that fluctuations in the levels of interest rates create an unexpected or unbudgeted burden on the PCC's finances, against which it has failed to protect itself adequately.

Current arrangements: The Prudential Code requires the PCC to fix each year the proportions of interest on borrowing and investment which may be subject to either fixed or variable rates. Since the investment activity is undertaken by Surrey County Council, it is important to ensure that any limits set by the PCC do not conflict with the County Council's prevailing limits. In order to achieve this both fixed and variable rate exposure the upper and lower limits for the PCC have been set at 0% and 100% respectively.

Surrey County Council employs a treasury consultant (Arlingclose) to advise on treasury strategy, provide economic data and interest rate forecasts. Their advice has been that following the increase in Bank Rate to 0.75% in August 2018, two more 0.25% hikes are forecast during 2019 to take official UK interest rates to 1.25% by the end of the year.

1.1.3 Exchange rate

Purpose: To avoid the risk that fluctuations in foreign exchange rates create an unexpected or unbudgeted burden on the PCC's finances, against which it has failed to protect itself adequately.

Current arrangements: The PCC's investments with Surrey County Council are not at any exchange rate risk as monies are not invested in foreign currencies.

1.1.4 Inflation

Purpose: To avoid the risk that prevailing levels of inflation cause an unexpected or unbudgeted burden on the PCC's finances, against which it has failed to protect itself adequately.

Current arrangements: Inflation has been included in the 2019/20 budget at the following rates:

	Employees	Non-pay
2019/20	2%	2.1% on contractual commitments

1.1.5 Credit and counterparty

Purpose: To avoid the risk of failure by a third party to meet its contractual obligations under an investment, borrowing, capital, project or partnership financing arrangement, particularly as a result of the third party's diminished creditworthiness, and the resulting detrimental effect on the PCC's capital or revenue resources.

Current arrangements: The PCC's only direct counterparty in relation to treasury management is Surrey County Council. All investments made by Surrey County Council are made in accordance with their investment policies and prevailing legislation and regulations.

1.1.6 Legal and regulatory

Purpose: To avoid the risk that the PCC, or a third party, fails to act in accordance with its legal powers or regulatory requirements, and to ensure that the PCC suffers no losses accordingly.

Current arrangements: It is a requirement of the service level agreement with Surrey County Council that they obtain satisfactory documented evidence that any counterparties are acting within their powers and that they have met the requirements of the Data Protection Act, the Money Laundering Regulations, and any other relevant legislation.

1.1.7 Fraud, error and corruption, and contingency management

Purpose: To minimise the risk that the PCC fails to identify the circumstances in which he might be exposed to losses through fraud, corruption and other eventualities in its treasury management dealings, and fails to employ suitable systems and procedures and maintain effective contingency management arrangements to these ends. This includes the area of risk commonly referred to as operational risk.

Current arrangements: Surrey County Council has adopted the CIPFA treasury management practices and will accordingly look to minimise risk in this area. Whilst much reliance is placed upon Surrey County Council, the OPCC monitors the cash balances and interest payments on a regular basis as part of the budget monitoring function, this in turn minimises risk in this area.

1.1.8 Market value of investments

Purpose: To avoid the risk that, through adverse market fluctuations in the value of principal sums that the PCC invests, its stated treasury management policies and objectives are compromised, against which effects it has failed to protect itself adequately.

Current arrangements: Interest on investments with Surrey County Council is based on the average interest on investments. SCC has embraced the spirit of the Prudential Code and CLG Guidance to invest funds prudently and have regard to the security and liquidity of its investments before seeking the highest rate of return or yield. The objective is to strike a balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. SCC currently uses only those instruments for investment that have no impact on the market value of principal sums. The SCC's treasury strategy would also permit the use of:

- Accounts, deposits, certificates of deposit
- Reverse purchase agreements
- Covered bonds

- Loans bonds and bills issued or guaranteed by national governments
- Bond, equity and property funds

Their proposed use would be subject to prior approval by the County's Audit & Governance Committee.

1.2 Performance management (TMP2)

1.2.1 The following methods, policies and benchmarks will be applied for evaluating the impact of treasury management decisions:

- Value for money
The PCC is committed to the principle of achieving best value in treasury management. Although returns on investment are low, this is offset by the competitive cost of the treasury management service provided by Surrey County Council (SCC). It is considered that SCC continue to provide value for money.
- Banking Services
The PCC currently uses the services of the HSBC.

1.3 Decision-making and analysis (TMP3)

1.3.1 Day-to-day investment decisions are taken on behalf of the PCC by Surrey County Council.

1.3.2 A quarterly record is provided by Surrey County showing the daily balances that have been invested and the average internal rate of return applied.

1.4 Approved instruments, methods and techniques (TMP4)

The PCC has adopted the approved instruments, methods and techniques recommended by Surrey County Council, as follows:

1.4.1. Investment

The following instruments are available to use for investment:

- Treasury Bills
- Deposits with banks, building societies and local organisations (and certain other bodies)
- Certificates of Deposits with banks or building societies
- Sterling Money Market Funds
- Government Debt Management Agency Deposit Facility
- Corporate Bonds
- Covered Bonds

Surrey County Council will lend to the following organisations on a short-term basis although their current strategy is to minimise cash balances to reduce interest costs; no lending is done to any organisation on a long-term basis:

- Banks and Building societies meeting the lending criteria
- Local Authorities as set out in the Local Government Act 2003
- Enhanced Cash/Corporate Bonds pooled funds

1.4.2 Approved Methods of Raising Finance

The following list specifies the borrowing instruments which may be utilised in seeking to achieve the Treasury Management objectives.

Short-term: All instruments repayable within one year.

Long-term: Loans from Public Works Loan Board (PWLB), Bonds and Mortgages.

Overdraft: The PCC may borrow by overdraft, i.e. short-term, from authorised banks or the Bank of England.

Leasing: Operating leases fall outside of the capital controls, therefore this form of finance should be considered where possible for the purchase of equipment and vehicles (the PCC's current policy is to purchase vehicles outright under the Joint Transport Service led by Sussex Police).

1.5 Organisation, clarity and segregation of responsibilities, and dealing arrangements (TMP5)

1.5.1 The overall responsibility for treasury management lies with the PCC, who has plenary powers in relation to all borrowing and investment matters.

1.5.2 The Treasurer takes overall responsibility for implementing the treasury management policy.

1.5.3 The Treasurer is responsible, under Section 151 of the Local Government Act 1972, for ensuring that the treasury management operation complies with the needs of the PCC and that its financial affairs are properly administered.

1.5.4 Day to day responsibility for treasury management rests with the Treasurer.

1.5.5 The day-to-day administration of treasury management is carried out by staff of Surrey County Council under the terms of a service level agreement. The approved activities of the Treasury Management Providers are as follows:

- Cash flow management (daily balances and longer term forecasting)

- Investing surplus funds in approved investments
- Interest rate exposure management
- Dealing with brokers and other external finance specialists

Surrey County Council currently use the following brokers:

- RP Martin/BGC
- Tullet Prebon
- Tradition

1.6 Reporting requirements and management information arrangements (TMP6)

1.6.1 The Treasurer will:

- prepare an annual Treasury Management Policy Statement and Strategy for the PCC to approve.
- recommend borrowing limits and other Prudential Indicators to be considered by the PCC as part of the budget setting process.
- report every six months (at the end of year and mid-year) to the PCC on the activities and performance of the Treasury Management function.

1.7 Budgeting, accounting and audit arrangements (TMP7)

1.7.1 Annual revenue budgets will include estimates of expected earnings on investment based on cash flow predictions for the forthcoming year and an examination of economic conditions and forecasts considered jointly with the PCC's treasury management provider at an annual review meeting.

1.7.2 Annual revenue budgets also include the expected cost of the provision of treasury management services and any direct overheads. This estimate is for an annual fee for the work carried out by Surrey County Council, under the terms of a service level agreement. The payment to Surrey County Council is based on 17% of the gross salary costs of their appointed senior finance officer for treasury, 8.5% of a pension fund and treasury manager plus 20% to cover the cost of administrative overheads. The total cost for 2018/19 was £18.5k.

1.8 Cash and cash flow management (TMP8)

1.8.1 Under the terms of the current arrangement with Surrey County Council, daily cash flow monitoring is carried out by the treasury management provider supported by information supplied by the Office of the Police and Crime Commissioner relating to:

- Precept and grant income flows

- Cheque and BACS payment runs
- Payroll payment runs
- Other known receipts and payments in excess of £100,000 per transaction

1.8.2 In reviewing the effectiveness of treasury management services, the Office of the Police and Crime Commissioner maintains a historic record of actual cash flow, daily balances, returns on investment from Surrey County Council and a variety of benchmark interest rates including:

- LIBID 7 day rates
- SCC average rate of return
- Base Rate

1.9 Money laundering (TMP9)

1.9.1 Surrey County Council is required to comply with the Money Laundering Regulations as are all UK professionals when they engage in financial and investment activities.

1.10 Training and qualifications (TMP10)

1.10.1 The PCC is aware of the growing complexity of treasury management in general, and its application to the public sector in particular. Modern treasury management demands appropriate skills, including:

- A knowledge of money and capital market operations
- An awareness of available sources of funds and investment opportunities
- An ability to assess and control risk, and
- An appreciation of the implications of legal and regulatory requirements

1.10.2 The PCC has a personal development system that should identify staff requiring training and support in treasury management functions. This is balanced with the service provided by SCC.

1.11 Use of external service providers (TMP11)

1.11.1 Treasury management functions are provided by Surrey County Council under a service level agreement.

1.12 Corporate governance (TMP12)

1.12.1 This document should be read in conjunction with the scheme of Governance documents which includes financial regulations and a scheme of delegation.

- 1.12.2 It is considered that this document taken as a whole with the service level agreement with Surrey County Council for the provision of treasury management activities, demonstrates a robust, rigorous and disciplined set of processes that are designed to balance prudence and sound risk management with the pursuit of the optimum return on investment.
- 1.12.3 Reporting arrangements have been designed to demonstrate openness and clarity whilst maintaining an appropriate split of duties and responsibilities.
- 1.12.4 In respect of the organisation's dealings with counterparties, external service providers and other interested parties, clear procedures have been developed to enable the PCC, as far as is practicable, to monitor their adherence to the legal or regulatory regimes under which they operate.