

CAPITAL AND INVESTMENT STRATEGY REQUIREMENTS 2022/23

Introduction

1. Under CIPFA's Prudential Code 2017 and Treasury Management Code 2017, the Council is required to publish four separate strategies or statements in addition to the revenue and capital medium term budget positions. These are contained within Appendix D to the budget report.

Strategy requirements

2. The Capital Strategy is an overarching document with a simple guide on the capital programme, borrowing investments and sets out the prudential indicators that the Council defines as parameters to work within setting a prudent and sustainable approach to its investment to meet service needs and any commercial activities.
3. The Capital Programme within the MTFF provides more comprehensive details on the Capital expenditure and financing from the information provided in the Capital Strategy.
4. The Treasury Management Strategy Statement provides further details on impact of the capital programme in relation to its cash flow forecast, need to borrow and strategy with parameters around methods in which it can invest Council money.
5. The Investment Strategy provides further detail from the Capital Strategy on investment objectives and parameters, focused on service and commercial investment activities.
6. The MRP statement outlines the approach to calculating the minimum revenue contribution within the legislative framework which is a revenue cost resulting from borrowing to fund the capital programme.

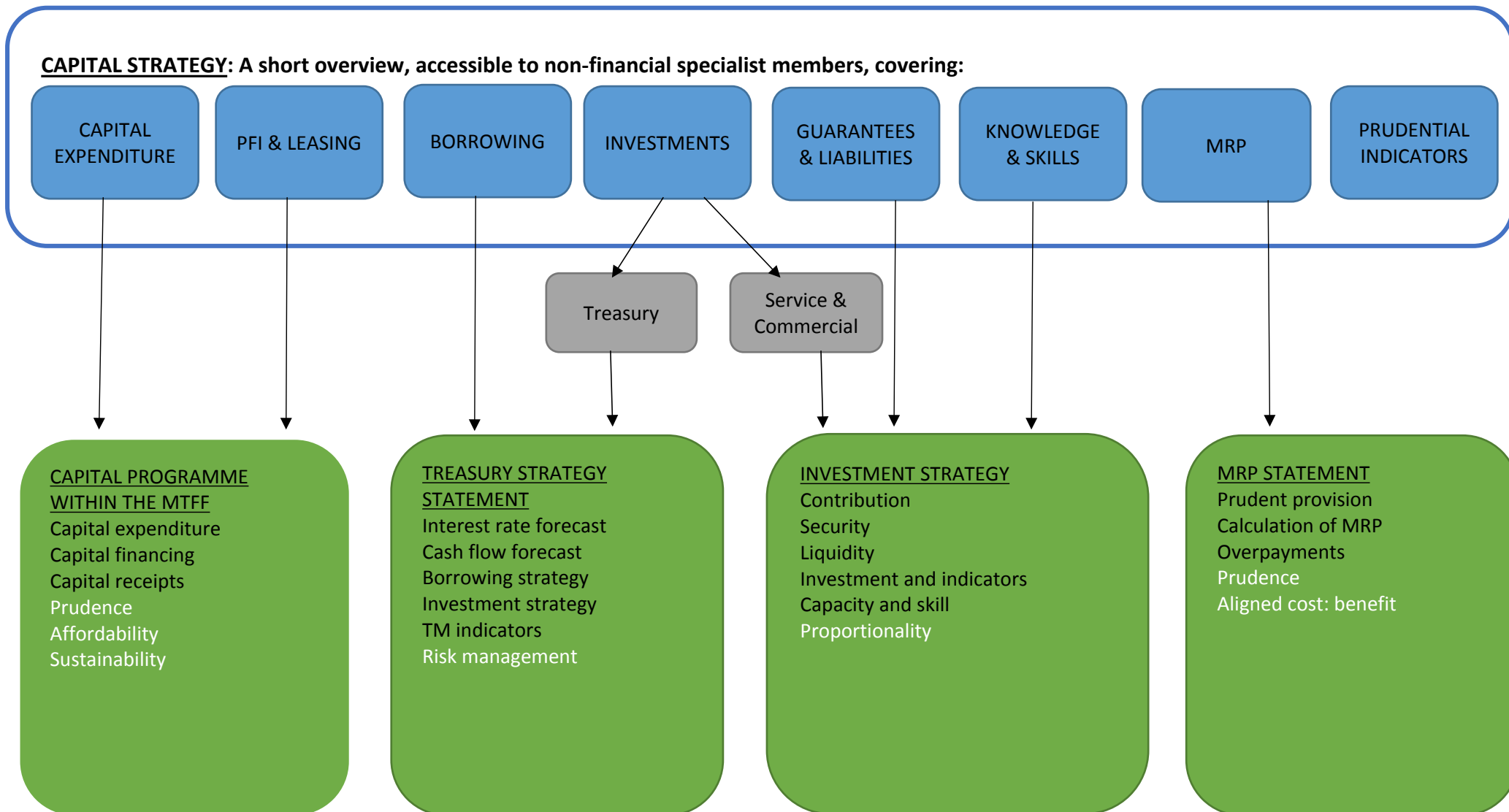
Recommended Changes for 2022/23

7. In addition to refreshing all forecasts and Prudential Indicators to align to the budget proposals for the new financial year, the Council will implement the new accounting standard for leases, IFRS 16 over from April 2022. This change will be neutral to the revenue accounts while lease assets and liabilities will be brought onto the balance sheet during 2022/23. This implementation of IFRS 16 has been deferred by the CIPFA Code of Practice over the past 3 years and will now be effective from April 2022. The MRP statement has been streamlined to remove references to historic approaches that were performed under previous guidelines issued by the Department for Levelling Up, Housing and Communities and its predecessors. The approach to calculating MRP remains consistent with that applied in recent years.

8. In November 2021, the Council resolved to undertake a review of the Council's investment strategy in the next twelve months to give consideration to climate change impacts, with the overarching framework established in this document enabling the outcomes of this review to be enacted during the 2022/23 financial year.

CIPFA Prudential Code of Practice 2021

9. During 2021/22, CIPFA concluded its consultation on the Prudential Code before issuing the CIPFA Prudential Code 2021 in December of the same year. While these strategies have been prepared in accordance with the Prudential Code 2017, due consideration has been given to the new code to ensure no breaches are made ahead of its full implementation for 2023/24. The strategies have been prepared under the 2017 code due to the timing of the release of the new code and pending the publication of guidance notes for local government practitioners expected in 2022.



CAPITAL STRATEGY REPORT 2022/23

Introduction

10. This capital strategy report gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services. The strategy also provides an overview of how associated risk is managed and the implications for future financial sustainability.
11. This strategy is integrated with other strategies; MTFE Capital Programme, Treasury Management Strategy, Investment Strategy and the MRP Statement where more detail is provided.

Capital Expenditure and Financing

12. Capital expenditure is where the Council spends money on assets, such as property or vehicles that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Council has some limited discretion on what counts as capital expenditure, for example assets costing below £10,000 are not capitalised and are charged to revenue in year.
13. In 2022/23, the Council is planning capital expenditure of £182.2m as summarised below:

Table 1: Prudential Indicator: Estimates of Capital Expenditure

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|-------------------------------|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| General Fund services | 71.5 | 104.3 | 95.6 | 60.1 | 31.6 | 27.3 |
| Housing Revenue Account (HRA) | 69.4 | 77.9 | 92.3 | 91.6 | 96.6 | 91.4 |
| TOTAL | 140.9 | 182.2 | 187.9 | 151.7 | 128.2 | 118.7 |
| <i>of which</i> | | | | | | |
| General Fund services | 63.5 | 97.3 | 95.6 | 60.1 | 31.6 | 27.3 |
| Housing Revenue Account (HRA) | 69.4 | 77.9 | 92.3 | 91.6 | 96.6 | 91.4 |
| Capital investments | 8 | 7 | 0 | 0 | 0 | 0 |
| TOTAL | 140.9 | 182.2 | 187.9 | 151.7 | 128.2 | 118.7 |

Appendix D1 - Capital Strategy Report 2022/23

14. The main General Fund capital programme includes the new Leisure Centre in West Drayton, investment in local schools alongside ongoing investment in local infrastructure. In addition, the Council has a £25m budget to support investment in housing through Hillingdon First Limited.
15. The main General Fund capital programme includes a new leisure centre in West Drayton, a major programme of investment in the borough's highways and investment in local schools. Some of the major priorities across 2022/23 – 2026/27; £65m education and school expansions, £66m on highways structural works and transport, £36m New Yiewsley Leisure Centre, £28m on Hillingdon watersports facility, £35m on the Civic centre project, £22m school building conditions, £12m on disabled facilities and £25m for carbon zero initiatives. In addition, the Council has a £25m budget to support investment in housing through Hillingdon First Limited.
16. The Housing Revenue Account (HRA) is a ring-fenced account which ensures that council housing does not subsidise, or is itself be subsidised, by other local services. HRA capital expenditure is therefore recorded separately, and includes expansion and enhancement (£194m) of the housing stock, regeneration projects (£127m) and new dwellings (£198m).
17. All capital expenditure must be financed, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves and Capital Receipts) or debt (borrowing, leasing and Private Finance Initiative). The planned financing of the above expenditure is as follows:

Table 2: Capital financing

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|------------------|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| External Sources | 31.4 | 57.9 | 39 | 43.1 | 24.9 | 24.1 |
| Own Resources | 53.9 | 44.6 | 73.1 | 63.9 | 53.1 | 43.7 |
| Debt | 55.6 | 79.7 | 75.8 | 44.7 | 50.2 | 50.9 |
| TOTAL | 140.9 | 182.2 | 187.9 | 151.7 | 128.2 | 118.7 |

18. Debt is only a temporary source of finance, since loans and leases must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as Minimum Revenue Provision (MRP). Alternatively, proceeds from selling capital assets (known as Capital Receipts) may be used to replace debt finance. MRP is a statutory mechanism for General Fund borrowing and details on how this is calculated is included in the MRP Statement policy. The HRA also provide a regular contribution towards it financing of debt.

Appendix D1 - Capital Strategy Report 2022/23

Table 3: Projected MRP and debt provision

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|-------------------------------|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| General Fund services | 6.1 | 7.3 | 8.3 | 9.7 | 10.3 | 10.9 |
| Housing Revenue Account (HRA) | 9.8 | 9.9 | 10.3 | 10.4 | 10.5 | 10.6 |

19. The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and Capital Receipts used to replace debt. The CFR is expected to increase by £62.83m during 2022/23. Based on the above figures for expenditure and financing, the Council's estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|-------------------------------|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| General Fund services | 252.9 | 288.4 | 304.5 | 311.6 | 313.8 | 303.1 |
| Housing Revenue Account (HRA) | 165.1 | 192.4 | 239.6 | 279.2 | 313.4 | 346.8 |
| TOTAL | 418.0 | 480.8 | 544.1 | 590.8 | 627.2 | 649.9 |
| <i>of which</i> | | | | | | |
| General Fund services | 234.9 | 263.4 | 279.5 | 286.6 | 288.8 | 278.1 |
| Housing Revenue Account (HRA) | 165.1 | 192.4 | 239.6 | 279.2 | 313.4 | 346.8 |
| Capital investments | 18.0 | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 |
| TOTAL | 418.0 | 480.8 | 544.1 | 590.8 | 627.2 | 649.9 |

Governance of Capital Expenditure

20. Specific capital projects are identified primarily through the Council's annual budget setting process which revises the approved capital programme for the following five years. Service managers submit proposals for new projects, outlining the reasons and benefits for the proposal and the estimated cost and method of financing. These proposals are reviewed at internal challenge sessions attended by senior managers across the organisation chaired by the Corporate Director of Finance. If proposals are deemed satisfactory at this stage they are included in a further submission to relevant Cabinet members. There is then a public consultation period in December on the full budget and impact to

Appendix D1 - Capital Strategy Report 2022/23

Council Tax. Following any further feedback, the final revised five year capital programme is submitted to Cabinet and Council for approval in February each year.

21. Implications of existing and new capital investment proposals in terms of the future impact on prudential borrowing levels and capital financing costs are taken into account in setting the revenue budget which is also approved by Council in February each year. The various sources of finance for all existing and new capital projects and programmes are identified and included in the Council's budget.
22. Some capital projects arise which require more short-term implementation during the current financial year, and these are usually managed through dedicated contingency budgets included in the five-year programme where there is anticipated need for that type of investment. These projects would normally be managed within overall borrowing limits approved by Council.
23. In order to subsequently proceed with implementation, all individual capital expenditure projects require a formal democratic decision from the Cabinet Member for Finance and relevant Cabinet members to release the monies included within the capital programme budget. To obtain approval for the budget to be released, a formal report is submitted providing detailed information on the objectives of the project and including a cost plan.

Asset Management

24. The maintenance and improvement of the Council's property assets and wider infrastructure are managed and formally set out in the Council's organisational structure, with specific service teams in place to manage various parts of the Council's asset portfolio.
25. In general, assets are managed in accordance with the principles of good estate management. The Council seeks continuous improvement in the quality of assets used to deliver services and wherever possible use its ownership of assets to deliver service improvements.
26. Service teams with responsibility for managing Council assets include:
 - Capital Programme Works Service: responsible for delivery of major new construction projects and capital works on existing property assets.
 - Repairs, Engineering, Planned Works and Facilities Management: maintenance of existing assets including repairs to Council buildings, voids and renewal of existing housing stock.
 - Highways and Street Lighting: maintenance and improvement of the roads and footways infrastructure, and maintenance and enhancement of street lighting.

Appendix D1 - Capital Strategy Report 2022/23

- Property and Estates Management: provide a complete overview of all properties and land owned by the council, including management of leases, ensuring that the full potential is being gained from each property asset.
- Fleet Engineering Team: manage the Council's vehicle requirements for areas such as waste management and various other services.
- ICT: maintaining and improving the Council's ICT infrastructure for both internal business operations, front line services and enhancing residents' online interactions with the Council.
- Green Spaces: maintain and enhance the various parks and green spaces sites across the Borough.

Asset Disposals

27. Assets are continually reviewed, to determine those that may be declared surplus to service requirements, with regular monitoring meetings. Proposals to change the purpose, to redevelop or to sell an asset are reported with options presented to the Council's property governance working group lead by the Council's Leader, Strategic Property Governance (SPG), to determine next steps on the most appropriate development or disposal route before recommendations are made to Cabinet. Progress on asset development and disposals is reported through monthly budget monitoring. Surplus assets may be sold to generate proceeds, known as Capital Receipts, which can be used to finance capital expenditure on new assets or enhancements to existing assets, or to repay debt. With the approval of Cabinet, surplus assets can also be appropriated between the General Fund and Housing Revenue Account (HRA) to reflect planned changes in use of the land where notional receipts are transferred between the funds.
28. Right to Buy Council housing sales, repayments of capital grants, loans and investments also generate Capital Receipts. The Council is currently also permitted to spend Capital Receipts on service transformation projects until 2022/23. The Council plans to invest £25m of Capital Receipts in the coming financial year (2022/23) on General Fund and HRA capital programmes and also transformation projects.
29. The Council's Flexible Use of Capital Receipts Policy, as set out in the Efficiency Strategy originally approved in September 2016, is to apply Capital Receipts to support transformation activity where this represents the most appropriate financing strategy. Aggregate levels of receipts expected to be applied will be reported to Cabinet through the budget monitoring report, with a comprehensive analysis of sums applied published as part of the outturn report – also presented to Cabinet.

Table 5: Capital receipt financing applied

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|------------------|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| Capital Receipts | 22.0 | 25.0 | 52.0 | 43.0 | 31.0 | 21.0 |

Treasury Management

30. Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council’s spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash is met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

Borrowing strategy

31. As of 31 March 2022, the estimated borrowing is £357.6m and £24.5m treasury investments.
32. The Council’s chief objectives when borrowing 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; this is achieved using a mix of low cost short-term loans (circa 1.1%) and long term fixed rate loans where the future cost are known but higher (circa 2.4%). The flexibility to renegotiate loans should the Authority’s long-term plans change is a secondary objective.
33. Projected levels of the Council’s total current outstanding debt (which comprises borrowing, PFI liabilities and leases) are shown below, compared with the projected capital financing requirement (see details above).

Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|---------------------------------|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| Debt (including PFI and leases) | 357.6 | 292.1 | 342.2 | 296.4 | 295.6 | 249.8 |
| Capital Financing Requirement | 418.0 | 480.8 | 544.1 | 590.8 | 627.2 | 649.9 |

34. CIPFA’s Prudential Code for Capital Finance in Local Authorities recommends that the Authority’s total debt should be lower than its highest forecast CFR over the next three years. Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term. Table 6 shows the Council’s existing debt along with the capital financing requirement while table 7

Appendix D1 - Capital Strategy Report 2022/23

shows the borrowing required to meet this financing requirement. In taking this any new borrowing, the Council will comply with the liability benchmark in table 7 to meet the capital financing requirement.

35. **Liability benchmark:** To compare the Council's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing compared to the CFR borrowing requirement. This assumes that internal resources such as reserves and working capital are utilised and that cash and investment balances are kept at around £25m at each year-end.

Table 7: Borrowing and the Liability Benchmark

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|--|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| Outstanding Borrowing | 357.6 | 292.1 | 342.2 | 296.4 | 295.6 | 249.8 |
| Borrowing Required to meet CFR | 60.4 | 188.7 | 201.9 | 294.4 | 331.6 | 400.1 |
| Borrowing Required to meet Liability Benchmark | -1.7 | 142.8 | 151.2 | 238.8 | 268.7 | 327.2 |

36. **Affordable borrowing limit:** The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit. Further details on borrowing can be found in the Treasury Management Strategy.

Table 8: Prudential Indicators: Authorised limit and operational boundary for external debt

| | 2021/22 limit £m | 2022/23 limit £m | 2023/24 limit £m | 2024/25 limit £m | 2025/26 limit £m | 2026/27 limit £m |
|---|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|
| Authorised Limit - Borrowing | 572.1 | 618.8 | 655.2 | 677.9 | 677.9 | 677.9 |
| Authorised Limit - PFI and Leases | 0.7 | 6.0 | 7.0 | 7.0 | 7.0 | 7.0 |
| Authorised Limit - Total External Debt | 572.8 | 624.8 | 662.2 | 684.9 | 684.9 | 684.9 |
| Operational Boundary - Borrowing | 542.1 | 588.8 | 625.2 | 647.9 | 647.9 | 647.9 |
| Operational Boundary - PFI and Leases | 0.7 | 1.0 | 2.0 | 2.0 | 2.0 | 2.0 |
| Operational Boundary - Total External Debt | 542.8 | 589.8 | 627.2 | 649.9 | 649.9 | 649.9 |

Treasury Investment Strategy

37. Treasury investments arise from receiving cash before it is paid out again. Investments made for service purposes or for commercial profit are not generally considered to be part of treasury management.
38. The Council's policy on treasury investments is to invest its treasury funds prudently and to prioritise security and liquidity over yield, which is to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely to minimise risk of loss, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Cash balances that will be held for longer terms is invested more widely in funds including in bonds and shares, to balance the risk of loss against the risk of receiving returns below inflation. Both short-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy and the Council may request its money back at short notice.
39. The Council will aim to hold a level of short-term investment balances which are not excessive but will ensure sufficient liquidity to manage the day-to-day activities of the Council. Longer-term investments are forecast at £15m over the next 5 years.
40. Further details on treasury investments can be found in the Treasury Management Strategy.

Appendix D1 - Capital Strategy Report 2022/23

41. Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Corporate Director of Finance and staff, who must act in line with the Treasury Management Strategy. The Treasury Management Strategy Statement is agreed by Cabinet in February prior to agreement at full Council before the start of each financial year. Amendments to the Treasury Management Strategy during the year are only done with Cabinet approval.
42. Treasury activity is monitored and reported to senior management on a daily and weekly basis. Monthly reports on treasury management activity, including compliance with prudential indicators, are provided to Cabinet as part of the budget monitoring process.

Investments for Service Purposes

43. The Council lends money to, and has a 100% shareholding in one subsidiary, Hillingdon First Ltd. The twin objectives are to deliver a financial return to the Council and provide housing for sale or rent. It will achieve this by generating of long-term sustainable revenue streams through the delivery of high quality housing to meet the need of Hillingdon's residents.
44. The Hillingdon First Limited shareholder agreement and memorandum of association sets out in detail the governance arrangements and provides details of the operating framework, controls and reporting requirements.

Commercial Activities

45. The Council has a £4.9m historic portfolio of investment properties which are managed through the Council's organisation structure. These assets are not held for normal operational activity but held under long-term commercial leases. Net Income generated from these assets in 2020/21 was £210k.

Liabilities

46. In addition to debt detailed above, the Council is committed to making future payments to cover its pension fund deficit and has made provisions to cover risks such as insurance claims and non-domestic rates appeal losses. The Council is also at risk of having to pay for claims following legal proceedings but has not put aside any money because the claims are denied and will be defended, and in some instances, counterclaims pursued.

Revenue Budget Implications

47. Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing

Appendix D1 - Capital Strategy Report 2022/23

costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 9: Prudential Indicator: Proportion of financing costs to net revenue stream

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|-----------------------------------|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| Financing Costs (£m) | 8.3 | 10.2 | 12.2 | 13.7 | 14.4 | 15.0 |
| Proportion of Net Revenue Stream* | 3% | 4% | 5% | 5% | 5% | 6% |

*Net revenue stream is the general fund budget requirement, which is funded through Council Tax Business Rates and Government Grants.

Sustainability

48. Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 35 years into the future. The Corporate Director of Finance is satisfied that both the proposed individual schemes and the overall programme are tested for affordability, sustainability and prudence.

Knowledge and Skills

49. The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions.
50. The Council adopts a continuous performance and development programme to ensure officers are regularly appraised and any training needs identified. Where appropriate, officers will attend training sessions, seminars and workshops to ensure their knowledge is up to date and relevant. Council Members are provided access to additional training where required.
51. Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field.

TREASURY MANAGEMENT STRATEGY STATEMENT 2022/23

Summary

52. Treasury management is the management of the Council's cash flows, borrowing and investments, and the associated risks. The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to the Council's prudent financial management.
53. Over the longer term, the Council considers the need to borrow money to fund its major capital projects and when the best time is to do this. The strategy aims to minimise borrowing and make use of internal funds where viable. Currently, there is an expectation that new borrowing will be required during 2022/23 of £140m. New borrowing to fund the capital financing requirement will be taken for cash flow purposes. With short-term interest rates currently much lower than long-term rates, new debt will be a mixture of short and medium-term durations designed to minimise cost without having a detrimental effect on refinancing risk.
54. The post COVID global economy has entered a higher inflationary phase, driven by a combination of resurgent demand and supply bottlenecks in goods and energy markets. Geopolitics are also playing a role, driving energy prices upwards which are being passed onto consumers. Tighter labour markets due to reduced participation rates have prompted concerns about wage-driven inflation, leading central banks to tighten policy to ensure inflation expectations remain anchored. Therefore, there is an expectation for Bank Rate to rise to 0.75% in March and 1.0% in May.
55. This report details the Council's approach and strategy towards borrowing and investing and provides details on sources of debt and investment instruments in which the Council can invest. All institutions on the counterparty list are regularly monitored, assessing risk and determining the limits of duration and value of investments.
56. For 2022/23, Treasury Management Strategy Statement (TMSS) follows the 2017 Code of Practice guidance.

Introduction

57. Treasury risk management is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2017 Edition (the CIPFA Code). This requires the Council to approve a treasury management strategy before the start of each financial year. This report fulfils the Council's legal obligation under the Local

Appendix D2 - Treasury Management Strategy Statement 2022/23

Government Act 2003 to have regard to the CIPFA Code. The strategy is developed as part of the Council's MTFF process.

58. Investments held for service purposes or for commercial profit are considered in a separate report; the 'Investment Strategy'.
59. The Council, by having significant investments and borrowing, is exposed to financial risks, including the loss of invested funds and the revenue effect of changing interest rates. As such treasury management operations are fundamentally concerned with managing risk. Whilst there are regulations and controls in place designed to minimise or neutralise risk, some risk exposure remains, due to the nature of managing loan and investment portfolios and cash flow activities. Active monitoring of the economic outlook, as well as changes in regulation, is undertaken where it impacts on the Council's treasury management strategy and risk parameters.
60. The major external influences on the Council's Treasury Management Strategy for 2022/23 will be the ongoing impact on the UK from coronavirus, together with higher inflations, the uncertainty of interest rates, and the country's new trading arrangements.
61. On 2 February 2022 the Bank of England (BoE) voted by a majority of 5-4 to increase Bank Rate to 0.5%. The MPC voted unanimously for the Bank of England to begin to reduce the stock of UK government bond purchases by ceasing to reinvest maturing assets. The Committee also voted unanimously for the Bank of England to begin to reduce the stock of sterling non-financial investment-grade corporate bond purchases by ceasing to reinvest maturing assets and by a programme of corporate bond sales to be completed no earlier than the end of 2023.
62. Looking forward, while there is still the chance of bank losses from bad loans as government and central bank support is removed, the institutions on the Authority's counterparty list are well-capitalised and general credit conditions across the sector are expected to remain benign. Duration limits for counterparties on the Authority's lending list are under regular review and will continue to reflect economic conditions and the credit outlook.

Balance Sheet and Treasury Position

63. The Council's borrowing strategy is driven by the estimated Balance Sheet position in the medium-term and capital programme expectations. The underlying need to borrow for capital purposes is reflected by the Capital Financing Requirement (CFR) which measures the cumulative capital expenditure that has not been financed from other Council resources such as capital grants, revenue contributions or financed from reserves. The CFR will generally be higher than

Appendix D2 - Treasury Management Strategy Statement 2022/23

the actual debt held due to timing requirements for cash flow purposes. This is called "internal borrowing".

64. The Council's CFR approach in this capital strategy document is to consider the financing requirement for the Council as a whole. Details of the CFR breakdown split between the General Fund and the HRA are outlined in The Council's Budget.
65. Estimates of the CFR, based on the projected capital programme over the next five years are shown in table 10. The Council's opening CFR is estimated at £418.0m for 2022/23, based on the closing 2021/22 figures. This CFR, less outstanding loans and other long-term liabilities of £357.6m, results in an opening gross borrowing requirement of £60.4m. Existing borrowing is identified into separate loan pools for GF and HRA. GF debt is £192.3m and HRA £164.6m, with £0.7m liabilities under PFI and finance leases.

Table 10

| | 2021/22 Forecast £m | 2022/23 budget £m | 2023/24 budget £m | 2024/25 budget £m | 2025/26 budget £m | 2026/27 budget £m |
|--|---------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| General Fund CFR | 252.9 | 288.4 | 304.5 | 311.6 | 313.8 | 303.1 |
| HRA CFR | 165.1 | 192.4 | 239.6 | 279.2 | 313.4 | 346.8 |
| Total CFR | 418.0 | 480.8 | 544.1 | 590.8 | 627.2 | 649.9 |
| Existing Borrowing* | -357.6 | -292.1 | -342.2 | -296.4 | -295.6 | -249.8 |
| Gross External Borrowing Required to meet CFR | 60.4 | 188.7 | 201.9 | 294.4 | 331.6 | 400.1 |
| Projected Useable Reserves** | -95.1 | -78.3 | -81.0 | -80.1 | -79.2 | -79.2 |
| Accumulated DSG Deficit | 28.0 | 27.4 | 25.3 | 19.5 | 11.3 | 1.3 |
| Projected Working Capital | -20.0 | -20.0 | -20.0 | -20.0 | -20.0 | -20.0 |
| (Investments) / New Borrowing Required | -26.7 | 117.8 | 126.2 | 213.8 | 243.7 | 302.2 |
| Plus Minimum Investments | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 |
| Liability Benchmark | -1.7 | 142.8 | 151.2 | 238.8 | 268.7 | 327.2 |

*Borrowing profile does not include potential calls on LOBO borrowing. Amount includes PFI

** Council controllable reserves only

Appendix D2 - Treasury Management Strategy Statement 2022/23

66. The increasing General Fund CFR is due to the Council's programme of capital investment funded by Council resources, with investment in local infrastructure leading this requirement. The HRA CFR increase is driven by investment in new and existing dwelling stock.
67. To compare the Council's actual borrowing against an alternative strategy, table 10 also shows a liability benchmark which calculates the lowest risk level of borrowing. This assumes the same CFR forecasts, but that cash and long-dated pooled fund balances are kept to a minimum level of £25m at each year-end to maintain sufficient liquidity but minimise credit risk. Thus the Council will take a low risk level approach for borrowing through the MTFF period.

Borrowing Strategy

68. The Council's external debt including PFI at 31 March 2022 will be £357.6m, an increase of £29m on the previous year. This is due to £45.0m of new temporary borrowing and £35m new long-term borrowing with the PWLB expected to taken out during 2021/22, less £47.3m as a result of naturally maturing debt. There were no opportunities to repay debt early in 2021/22. A further £65.8m is scheduled for repayment in 2022/23. Over 2021/22 the Council's loan portfolio had an average interest rate of 2.45%. The Council may also borrow additional sums to pre-fund future requirements during 2022/23 where this offers better value for money, providing this does not exceed the authorised limit for borrowing of £624.8m.
69. The Council's chief objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The flexibility to renegotiate loans should the Council's long-term plans change is a secondary objective. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the Council continues to avoid this activity which ensures the authority retains access to PWLB borrowing.
70. Projected capital expenditure levels, market conditions and interest rate levels are monitored throughout the year. This enables the Council to adapt borrowing strategies to minimise borrowing costs over the medium to longer term whilst maintaining financial stability. Table 10 above shows the Council is expecting it will need to borrow in 2022/23 based on the full capital programme and debt maturity profile.
71. The council currently has a short-term loan portfolio sourced from other local authorities of £100m with £45m of that maturing in the same year. It is expected to remain around this level throughout 22/23. This will enable the Council to meet the MiFID II minimum investment balance criteria with the subsequent long-dated pooled funds.

Appendix D2 - Treasury Management Strategy Statement 2022/23

72. The Council may arrange forward starting loans during 2022/23, where the interest rate is fixed in advance, but the cash is received in the later years. This would enable certainty of cost to be achieved without suffering a cost of carry (borrowing costs before the debt is physically required for cash flow purposes) in the intervening period.

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

- HM Treasury's PWLB lending facility (formerly the Public Works Loan Board)
 - Any institution approved for investments
 - UK local authorities
 - Any other bank or building society authorised to operate in the UK
 - Any other UK public sector body
 - UK public and private sector pension funds (except Hillingdon Pension Fund)
 - Capital market bond investors
 - UK Municipal Bonds Agency plc (for instruments where joint and several liability are required on the part of the borrowers, use of such instruments will be subject to Cabinet approval)
 - Other special purpose companies created to enable local authority bond issues
73. Other sources of debt finance: in addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:
- Leasing
 - Hire Purchase
 - Private Finance Initiative
 - Sale and Leaseback
74. The Authority has previously raised the majority of its long-term borrowing from the PWLB but will consider long-term loans from other sources including banks, pensions and local authorities and will investigate the possibility of issuing bonds and similar instruments, in order to lower interest costs and reduce over reliance on one source of borrowing in line with the CIPFA code. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the Council intends to avoid this activity in order to retain its access to PWLB loans.
75. To cover short-term borrowing requirements or unexpected cash flow shortages, the Council may borrow short term, which would mainly be sourced from other

Appendix D2 - Treasury Management Strategy Statement 2022/23

local authorities. However, short term borrowing leaves the Council exposed to the risk of short-term interest rate rises and are therefore subject to interest rate exposure limits in the treasury management indicators in tables 11 and 12. Financial derivatives may be used to manage this interest rate risk.

76. Where borrowing is required this will be attributed directly to either the GF or HRA loan pools. Interest costs will be separated between the two pools and allocated accordingly.

Interest Rate Risk

77. Within the loan portfolio, the Council has fixed rate loans of £336.8m which protect against interest rate rises. The Council holds market loans of £48m of which £36m are Lender's Option Borrower's Option (LOBO) loans. The remaining £12m are classified as fixed rate debt. In 2022/23, one £5m loan will be in its call period during 2022/23 and so is reclassified for the period as variable. It is highly unlikely that the loan will be called given interest rates are now lower than those at the inception of the loan. In the event the lender exercises the option to change the rate or terms of the loan, the Council will consider the new terms and the option of repayment of the loan without penalty. The Council may utilise cash resources for repayment or may consider replacing the loan by borrowing from the approved sources. The default position however will be early repayment without penalty. The Council will not utilise LOBO loans for any new borrowing. In addition, a further £15m PWLB Fixed Rate EIP loans is expected to be obtained by the end of 21/22.

Interest rate exposures

78. In order to manage interest rate risk, the Council will aim to balance variable rate debt with its exposure to variable rate investments. This approach will offset any increase or decrease in borrowing costs with comparable changes in investment income.
79. The Council is required to set an indicator to control the Council's exposure to interest rate risk. Table 11 shows upper limits on the one-year revenue impact of a 1% rise or fall in interest rates.

Table 11

| Interest Rate Risk Indicator | Limit |
|---|---------|
| Upper limit on one-year revenue impact of a 1% rise in interest rates | £1.0m |
| Upper limit on one-year revenue impact of a 1% fall in interest rates | £(1.0m) |

The impact of a change in interest rates is calculated both on the assumption that fixed-rate maturing loans and investments will be replaced at their existing fixed rates and with a forecast maximum variable rate net investment and debt position of £100m.

Appendix D2 - Treasury Management Strategy Statement 2022/23

Debt Rescheduling

80. The PWLB allows authorities to repay loans before maturity at a premium or discount. Other lenders may also be prepared to negotiate premature redemption terms. The Council may take advantage of this and replace some loans with new loans or repay early without replacement. The rationale for rescheduling is to provide an overall cost saving and, or reduce risk; balance the volatility profile (i.e. the ratio of fixed to variable rate debt); or amend the profile of maturing debt to reduce any inherent refinancing risks.
81. Rates and markets are regularly monitored to identify opportunities for rescheduling and any borrowing and rescheduling activity is reported monthly to Cabinet. However, current market conditions are resulting in significant early redemption costs for fixed rate debt and unless these are significantly reduced, it is unlikely any debt rescheduling will be undertaken in 2022/23.
82. The Council will limit and monitor large concentrations of debt needing to be replaced through the prudential indicator in table 12. The upper and lower percentage limits are intended to control excessive exposure to volatility in interest rates on refinancing of maturing debt by setting a structure for borrowing maturity profiles. Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment. The first scheduled LOBO call option is included as the maturity date within this indicator.

Table 12

| Maturity Structure of Borrowing | % Fixed Term loans maturity profile at 31/03/22 | % Market LOBO loans 1st call option profile at 31/03/22 | Lower Limit for 2022/23 % | Upper Limit for 2022/23 % |
|--|--|---|----------------------------------|----------------------------------|
| Under 12 months | 25.50 | 1.46 | 0 | 50 |
| 12 months and within 24 months | 9.41 | 1.46 | 0 | 50 |
| 24 months and within 5 years | 9.21 | 7.16 | 0 | 50 |
| 5 years and within 10 years | 14.29 | 0 | 0 | 100 |
| 10 years and within 20 years | 19.18 | 0 | 0 | 100 |
| 20 years and within 30 years | 0 | 0 | 0 | 100 |
| 30 years and within 40 years | 8.37 | 0 | 0 | 100 |
| 40 years and within 50 years | 2.34 | 0 | 0 | 100 |
| 50 years and above | 1.17 | 0 | 0 | 100 |
| Total | 89.47 | 10.53 | 0 | 100 |

* Figures above do not include £15m Fixed EIP expected to be taken by the end of 21/22)

Appendix D2 - Treasury Management Strategy Statement 2022/23

Treasury Investment Strategy

83. The CIPFA Code requires the Council to invest funds prudently and have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield.
84. The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves. For 2021/22, the Council's investment peaked at £124.7m – with higher balances primarily being driven by the range of business and household support funds routed through local authorities by the Government in response to COVID-19. As a result of the capital programme expenditure and the unwinding of pandemic support schemes, investment balances are expected to be lower during 2022/23.
85. When investing funds, the Council looks to balance risk and return, minimising the risk of incurring losses from defaults, and the risk receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the Council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested.
86. The post COVID global economy has entered a higher inflationary phase resulting in expectation of Bank Rate rises in March and May. These rises are expected to feed through to increased interest rates on short-term investment options and therefore increased income.
87. Given the increasing risk and very low returns from short-term unsecured bank deposits, the Council will continue with the existing strategy of placing £15m in long-dated strategic pooled funds.
88. Under the IFRS 9 standard, the accounting for certain investments depends on the Authority's "business model" for managing them. The Authority aims to achieve value from its treasury investments by a business model of collecting the contractual cash flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.
89. The Corporate Director of Finance under delegated powers will, on a daily basis, determine the most appropriate form of investments, in keeping with investment objectives, income and risk management requirements. Investments will also be made with reference to the approved investments detailed in table 15. Activity concerning the core strategic investment portfolio will be reported monthly to Cabinet.

Bail-In Risk

90. Banking reform legislation was incorporated into UK law from January 2015 and exposes the Council to bail-in risk on all unsecured bank deposits. The risk of

Appendix D2 - Treasury Management Strategy Statement 2022/23

bail-in is effective at the point when banks are considered underperforming rather than once, they have failed. With most large entities either exempt or not exposed, local authorities will be one of the primary bail-in targets with a potential loss of 100% of the deposit.

91. There are several secure deposits available to the Council to reduce bail-in exposure. Secure deposits include Covered Bonds (fixed and floating rate notes) and Repurchase Agreements (REPO's). Secure deposits are longer in duration and can be difficult to invest as a result. The majority of the Council's investments must remain liquid to fund cash flow requirements, resulting in bail-in risk being inherent in the Council's investment portfolio.
92. **Government:** Loans to, and bonds and bills issued or guaranteed by, national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.
93. **Secured investments:** Investments secured on the borrower's assets, which limits the potential losses in the event of insolvency. The amount and quality of the security will be a key factor in the investment decision. Covered bonds and reverse repurchase agreements with banks and building societies are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit rating, the higher of the collateral credit rating and the counterparty credit rating will be used. The combined secured and unsecured investments with any one counterparty will not exceed the cash limit for secured investments.
94. **Banks and building societies (unsecured):** Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. See below for arrangements relating to operational bank accounts.
95. **Money Market Funds (MMF's):** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets remain an important vehicle in the Council's investment portfolio. Money Market Funds may reduce the risk of bail-in as they have the advantage over bank accounts of providing wide diversification of investment risks,, coupled with the services of a professional fund manager in return for a small fee. Although no sector limit applies to money market funds, the Council will diversify over a variety of MMF providers to ensure access to cash at all times. Where MMF's participate, the Council utilises the facilities of a MMF portal to make subscriptions and

Appendix D2 - Treasury Management Strategy Statement 2022/23

redemptions. The portal procedure involves the use of a clearing agent; however, the Council's funds are ring-fenced throughout the process.

96. **Strategic Pooled Funds:** Bond, equity and property funds that offer enhanced returns over the longer term but are more volatile in the short term. These allow the Authority to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Authority's investment objectives will be monitored regularly.

Appendix D2 - Treasury Management Strategy Statement 2022/23

Credit Risk

97. The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential government support, reports in the quality financial press and analysis and advice from the Council's treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.
98. The Council's in-house investments are made with reference to the outlook for the UK Bank Rate, money market rates and other macroeconomic factors. In any period of significant stress in the markets or heightened counterparty risk, the fallback position is for investments to be placed with central government's Debt Management Office (DMO), to purchase UK Treasury Bills or deposits with other local authorities. The rates of interest from the DMO are below the equivalent money market rates in most cases, but this is an acceptable counterbalance for the guarantee that the Council's principal sum invested is secure.

High Credit Quality

99. The Council has defined "high credit quality" for deposits and investments in organisations and securities as those having a minimum credit rating of A- for UK counterparties, A+ for overseas counterparties and AA+ for non-UK sovereigns. Covered Bonds will be restricted to bond issues of AA or above.
100. When determining the minimum acceptable credit quality, the Council will not only consider the credit rating criteria above but also advice from Arlingclose, information on corporate developments and market sentiment towards investment counterparties. For credit rated counterparties, the minimum criteria will be the lowest equivalent long term ratings assigned by Fitch, Moody's and Standard & Poor's (where assigned). Long term minimum: A- (Fitch); A3 (Moody's); A- (S&P). The Council will aim to have a weighted average credit score of A- for the rated element of its investment portfolio and treasury investments in the sectors marked with an asterisk in Table 15 below will only be made with entities whose lowest published long-term credit rating is no lower than A-. The Council's portfolio average credit rating as at 31 March 2022 is forecast at AA-.
101. To diversify investments within the portfolio, funds will be placed with a range of counterparties which meet agreed minimum credit risk requirements. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria. Diversification will be achieved by applying individual limits with each counterparty; for unsecured deposits this is capped to £6.5m. Varying

Appendix D2 - Treasury Management Strategy Statement 2022/23

instruments and investment periods will be utilised to meet liquidity requirements and mitigate risks. Table 15 shows investment limits and allowable instruments.

Investment limits:

102. The Authority's revenue reserves available to cover investment losses are forecast to be £26.6m on 31 March 2022. In order that no more than 50% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £6.5m. A group of entities under the same ownership will be treated as a single organisation for limit purposes. Credit risk exposures arising from non-treasury investments, financial derivatives and balances greater than £15m in operational bank accounts count against the relevant investment limits. Limits will also be placed on fund managers, investments in brokers' nominee accounts, foreign countries and industry sectors as shown in table 15. Investments in pooled funds and multilateral development banks do not count against the limit for any single foreign country, since the risk is diversified over many countries.

Risk Assessment and Credit Ratings

103. Credit ratings are obtained and monitored by the Council's treasury advisers, who will notify changes in ratings as they occur. The credit rating agencies in current use are listed in the Treasury Management Practices document. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:

- no new investments will be made;
- any existing investments that can be recalled or sold at no cost will be; and
- full consideration will be given to the recall or sale of all other existing investments with the affected counterparty.

104. Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "negative watch" so that it may fall below the approved rating criteria, then only investments that can be withdrawn on the next working day will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.

Appendix D2 - Treasury Management Strategy Statement 2022/23

Liquidity Risk

105. The Council will ensure it has liquid funds available to settle its payment obligations when they fall due and uses cash flow modelling techniques to determine the maximum term for which funds may be prudently committed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. It will utilise instant access facilities including call accounts and MMFs for core working capital balances and structure longer term maturities to correspond to large cash outflows with reference to the Council's capital programme and cash flow forecast.
106. The Council will spread its liquid cash over at least four providers (e.g bank accounts and money market funds) to ensure that access to cash is maintained in the event of operational difficulties at any one provider.
107. The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within 1 day, without additional borrowing.

Table 13

| Liquidity Risk Indicator | Target |
|-----------------------------------|--------|
| Total cash available within 1 day | £10m |

Principal sums invested for periods longer than a year

The Council has placed an upper limit for principal sums invested for periods longer than a year. This limit is to control the Council's exposure to the risk of incurring losses by seeking early repayment of the sums invested. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

Table 14

| Price Risk Indicator | 2021/22 £m | 2022/23 £m | 2023/24 £m | 2024/25 £m | 2025/26 £m | 2026/27 £m |
|----------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| | 35 | 35 | 35 | 35 | 35 | 35 |

Return on Invested Sums

108. The Council's treasury management adviser Arlingclose is forecasting that BoE Bank Rate will rise in calendar Q2 2022 to subdue inflationary pressures and the perceived desire by the BoE to move away from emergency levels of interest. Investors continue to price in multiple rises in Bank Rate over the next forecast horizon, and Arlingclose believes that although interest rates will rise, the increases will not be to the extent predicted by financial markets.

Appendix D2 - Treasury Management Strategy Statement 2022/23

Council's Bank Account

109. The Council's bank account is held with NatWest plc and is currently rated above the Council's agreed minimum A- rating at A. Should the credit rating fall below A- the Council may continue to deposit surplus cash on condition that investments can be withdrawn on the next working day, and the bank maintains a credit rating no lower than BBB-.

Approved investment counterparties and limits

110. The Authority may invest its surplus funds with any of the counterparty types in table 15 below, subject to the limits shown.

Appendix D2 - Treasury Management Strategy Statement 2022/23

Table 15

| Instruments | Counterparty | Maximum Exposure Limits | Maximum Duration Limits |
|--|--|---|--------------------------------|
| Term Deposits | DMADF, DMO* | No Limit | 50 Years |
| Term Deposits | Other UK Local Authorities* | £35m per Local Authority / No total limit | 25 Years |
| Instant Access Accounts / Notice Accounts / Term Deposits / Certificates of Deposit / REPO's | UK Banks and Building Societies* | Unsecured Deposits £6.5m Secured Deposit - REPO's (In addition to unsecured limits) £15m | 13 Months |
| Instant Access Accounts / Notice Accounts / Term Deposits / Certificates of Deposit | Overseas Banks* | Unsecured Deposits £6.5m Overseas Bank Total - 50% in aggregate Secured Deposit - REPO's (In addition to unsecured limits) £15m | 13 Months |
| Registered Secured Deposits (including Covered Bonds) | Bond issue minimum AA Rated* | £15m (Per issue) | 5 Years |
| Gilts | DMO* | No Limit | No Limit |
| Treasury Bills | DMO* | No Limit | No Limit |
| Local Authority Bonds | Other UK Local Authorities* | No Limit | No Limit |
| Money Market Funds | Money Market Funds (LVNAV)* | £5m per fund. Maximum MMF exposure 100% | N/a |
| Strategic Pooled Funds | Pooled Funds (Cash Plus & Short-Bond Funds with investment horizons < 1year) | £5m per fund. Maximum Pooled Fund exposure £15m | N/a |
| Strategic Pooled Funds | Pooled Funds (Strategic & Long-Dated Funds with investment horizons > 1year) | £5m per fund. Maximum Pooled Fund exposure £15m | N/a |

111. Specific duration limits will be based on guidance from the Council's treasury advisers and with an additional overlay of prudence applied by the Council. In determining the period to maturity of an investment, the investment should be regarded as commencing on the date of the commitment of the investment rather than the date on which funds are paid over to the counterparty. Instruments and limits would be amended on notification of any potential risk concerns.

Other Items

112. The CIPFA Code requires the Council to include the following in its treasury management strategy.

Appendix D2 - Treasury Management Strategy Statement 2022/23

Policy on Use of Financial Derivatives

113. Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in Section 1 of the Localism Act 2011 removed much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment).
114. The Council will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks to which the Council is exposed. Additional risks presented, such as credit exposure to derivative counterparties, will be considered when determining the overall level of risk. Embedded derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.
115. Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria, assessed using the appropriate credit rating for derivative exposures. An allowance for credit risk calculated using the methodology in the Treasury Management Practices document will count against the counterparty credit limit and the relevant foreign country limit.
116. In line with the CIPFA Code, the Council will seek external advice and will consider that advice before entering into financial derivatives to ensure that it fully understands the implications.

Policy on Apportioning Interest to the Housing Revenue Account (HRA)

117. With the introduction of HRA self-financing in March 2012 the Council allocated specific loans to both the General Fund and the HRA. In the future, new long term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs applicable to each loan are charged directly to the respective revenue account.
118. Interest earned on HRA balances will be calculated and distributed in accordance with DLUHC (Department for Levelling Up, Housing and Communities) guidelines and based on a DMADF risk free rate of return to match the risk free credit exposure applicable to the HRA. Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative. This balance will be measured each year and interest transferred between the General Fund and HRA at the Council's average interest rate on investments, adjusted for credit risk.

Appendix D2 - Treasury Management Strategy Statement 2022/23

Balanced Budget Requirement

119. The Council complies with the provisions of Section 32 of the Local Government Finance Act 1992 to set a balanced budget.

Monitoring and Reporting

120. Treasury activity is monitored and reported to senior management on a daily and weekly basis. Monthly updates including compliance with Prudential Indicators are provided to Cabinet as part of the budget monitoring process.

121. The Treasury Management Strategy Statement is agreed by Cabinet prior to agreement at full Council in February each year. Amendments to the TMSS during the year are only done with Cabinet approval.

Financial Implications

122. The proposed budget for investment income in 2022/23 is £0.4m and debt interest payable of £8.8m (£3.3m GF, £5.6m HRA). If actual levels of investments and borrowing, or actual interest rates, differ from those forecast, performance against budget will be correspondingly different and split into General Fund and HRA budgets if applicable.

Market in Financial Instruments Directive II (MiFID II)

123. The Council has opted up to professional client status with its providers of financial services, including advisers, banks, brokers and fund managers, allowing it access to a greater range of services but without the greater regulatory protections afforded to individuals and small companies. Given the size and range of the Council's treasury management activities, the Chief Financial Officer believes this to be the most appropriate status. In order to maintain an ongoing professional status, the Council must always hold as a minimum £10m of investments. The allocation to strategic pooled funds and minimum cash requirements will ensure compliance with this criterion.

INVESTMENT STRATEGY REPORT 2022/23

Introduction

124. The Council invests money for two broad purposes:

- because it has surplus cash as a result of its day-to-day activities, (**treasury management investments**),
- to support local public services by lending to or buying shares in other organisations (**service investments**).

125. This investment strategy is a new report since 2020/21, meeting the requirements of statutory guidance issued by the government in January 2018, and focuses on the second of these categories.

Treasury Management Investments

126. The Council typically receives its income in cash before it pays for its expenditure in cash. It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy. Treasury management investments can be made on either a short-term or long-term basis. The balance of treasury management investments is expected to fluctuate between £15m and £124.7m during the 2021/22 financial year.

127. The contribution that these investments make to the objectives of the Council is to support effective treasury management activities.

128. Full details of the Council's policies and its plan for 2022/23 for treasury management investments are covered in a separate document, the Treasury Management Strategy.

Service Investments: Loans & Shares

129. The Council lends money to, and has a 100% shareholding in one subsidiary, Hillingdon First Ltd, which was incorporated during 2018/19. The objective is to deliver a financial return to the Council and provide housing for sale or rent. It will achieve this by generating of long-term sustainable revenue streams through the delivery of high quality housing to meet the need of Hillingdon's residents. Both loans and share holdings commenced during 2019/20.

130. The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. While one of the risks of investing in shares is that they fall in value meaning that the initial outlay may not be recovered.

Appendix D3 - Investment Strategy Report 2022/23

131. In order to limit these risks, upper limits on the sums invested in each category have been set in table 16 below. Furthermore, the Council is protected against any losses through a charge over the assets of Hillingdon First Ltd.

Table 16: Loans & Shares for service purposes

| Hillingdon First Ltd | 2022/23 Approved Limit £m |
|----------------------|------------------------------|
| Loans | 0-17.5 |
| Shares | 0-25 |
| TOTAL | 25 |

132. Accounting standards require the Council to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Council's statement of accounts will be shown net of any cost allowance.
133. The Council assesses the risk of loss before entering into and whilst holding service loans. The sales property market across Hillingdon and London has seen positive price growth in during 2021/22, supported by the stamp duty holiday that stated in 2020/21 and wider Government interventions in response to COVID-19. While these measures have been stepped down in 2021/22, The market continues to hold in the growth of house prices fuelled by demand. As such, continued development across the borough will ensure this demand continues to be met.
134. The Council aligns loan durations with each specific development. A specific loan agreement is drawn up for each development using the agreed schedule as a framework. Hillingdon First Ltd will be required to provide full development scheme details to the Shareholder Committee (acting on behalf of the Council as the shareholder) before the loan facility can be drawn down for specific expenditure on that development.
135. The Council will ensure it remains within the limits shown in table 16 for service loans and shares through monthly monitoring and reporting to senior management. Compliance with limits will also form part of the monthly reporting to Cabinet.
136. Shares are the only investment type classified as non-specified investment, the limits above in table 16 on share investments are therefore also the Council's upper limits on non-specified investments.

Loan Commitments and Financial Guarantees

137. Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the Council and are included here for completeness.
138. The Council has a contractual agreement in place to enable it to make up to £35m of loans, in total, to Hillingdon First Ltd should it request it. The Council has powers to terminate this agreement. The Council has no loan guarantees in place.

Proportionality

139. In the 2022/23 budget plan the Council does not intend to be dependent on profit generating investment activity to achieve a balanced revenue budget. The primary role of Hillingdon First Ltd is to contribute to delivering more quality housing to meet the needs of Hillingdon's residents and towards improving long-term revenue income, which it is anticipated be a more efficient route than the disposal of surplus assets.

Borrowing in Advance of Need

140. In accordance with government guidelines, the Council does not intend to borrow more than or in advance of need purely in order to profit from investment of the extra sums borrowed.

Capacity, Skills and Culture

141. Elected members and Officers receive training and undergo continuous professional development to ensure their knowledge is current and relevant. Where required, Officers and Members are supported by specialists on technical, commercial and regulatory matters.
142. The Council's investment strategy to date has been approved by Cabinet and full Council as part of the Treasury Management Strategy statement. Under delegated powers, the Corporate Director of Finance will, on a daily basis, determine the most appropriate form of investments in accordance with the Council's investment objectives, income and risk management requirements.
143. The Council's investment position, including compliance with prudential indicators, is reported to Cabinet on a monthly basis as part of the monitoring process.
144. The shareholder agreement and memorandum of association sets out in detail the governance arrangements and provides details of the operating framework, controls and reporting requirements for Hillingdon First Ltd. No actions should cause the company or the Council to breach the Local Authorities (Companies) Order 1995.

Appendix D3 - Investment Strategy Report 2022/23

Investment Indicators

145. The Council has set the following quantitative indicators to allow elected members and the public to assess the Council's total risk exposure as a result of its investment decisions.
146. The indicator in table 17 shows the Council's total exposure to potential investment losses. This includes amounts the Council has agreed it could lend to Hillingdon First Ltd, but have yet to be drawn down.

Table 17: Total investment exposure

| Total Investment Exposure | 2020/21 Actual £m | 2021/22 Forecast £m | 2022/23 Forecast £m |
|---------------------------------|-------------------------|---------------------------|---------------------------|
| Treasury Management Investments | 43.2 | 25 | 25 |
| Service investments: Loans | 6.7 | 6.7 | 17.5 |
| Service investments: Shares | 3.8 | 3.8 | 17.5 |
| Total Exposure | 53.7 | 35.5 | 50.0 |

147. Service loans and shares in Hillingdon First Ltd are classified as capital expenditure and can be described as being funded by borrowing. The remainder of the Council's investments are financed by usable reserves and income received in advance of expenditure.

Table 18: Investments funded by borrowing

| Total Investment Exposure | 2020/21 Actual £m | 2021/22 Forecast £m | 2022/23 Forecast £m |
|----------------------------------|-------------------------|---------------------------|---------------------------|
| Treasury Management Investments | 0 | 0 | 0 |
| Service investments: Loans | 6.7 | 6.7 | 17.5 |
| Service investments: Shares | 3.8 | 3.8 | 17.5 |
| Total funded by borrowing | 10.5 | 10.5 | 25.0 |

148. The rate of return received indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred.

Table 19: Investment rate of return (net of all costs)

| Investments Net Rate of Returns | 2020/21 Actual | 2021/22 Forecast | 2022/23 Forecast |
|---------------------------------|-------------------|---------------------|---------------------|
| Treasury Management Investments | 0.07% | 0.52% | 0.52% |
| Strategic Long-Term Investments | 2.96% | 2.69% | 2.90% |
| Service investments: Loans | 5.10% | 5.10% | 5.10% |
| Service investments: Shares | 0.00% | 0% | 0% |

2022/23 MRP STATEMENT

149. Where the Council finances its capital programme through borrowing it must set aside resources annually through a Minimum Revenue Provision. This is within the revenue budget to repay the debt in later years. The Local Government Act 2003 requires the Council to have regard to Guidance issued in 2018 on Minimum Revenue Provision issued by DLUHC.
150. MRP in 2022/23: MRP will generally be charged over the useful life of the assets, beginning in the year after the asset becomes operational. In all cases we will consider the most prudent method of providing for debt repayment. The HRA will make a form of MRP to pay down its debt over the context of its 30 year business cycle on which the settlement is based.
151. Where former operating leases have been brought onto the balance sheet on 1st April 2022 due to the adoption of the IFRS 16 Leases accounting standard, and the asset values have been adjusted for accruals, prepayments, premiums and/or discounts, then the annual MRP charges will be adjusted so that the total charge to revenue remains unaffected by the new standard.
152. With the implementation of IFRS 16, operating leases that meet the capitalisation thresholds will be brought to the balance sheet with their net book values as an asset at the outstanding amounts as liabilities. A revenue charge will then be made in the year that is due for both the principal and the interest due. Each payment made for each asset reduces the long-term liability outstanding.
153. Capital expenditure financed by borrowing and incurred during 2022/23 is not subject to an MRP charge until 2023/24. For assets under construction and significant assets, an MRP charge may be delayed until the asset is deemed available for use.
154. **Overpayments:** In earlier years, the Authority has made voluntary overpayments of MRP that are available to reduce the revenue charges in later years. The table below shows over payments made in 2020/21. No plans have been made for overpayments in 2022/23.

Table 20: MRP Overpayments

| MRP Overpayments | £m |
|-----------------------------|-----|
| Expected balance 31.03.2022 | 8.6 |
| Planned drawdown 2022/23 | 0.0 |
| Forecast Balance 31.03.2023 | 8.6 |