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## REPORT / SUMMARY DECISION SHEET

**PURPOSE:** Commissioner DECISION

**Timing:** Urgent – before the start of the 2024/25 financial year

**Title:** 2024/25 Treasury Management Strategy

**Category of Decision / Business Area Impact:** Finance

**Executive Summary:**

This document sets out the Commissioner's Treasury Management Strategy including Prudential Indicators, Financing Requirement and Minimum Revenue Provision policy for 2024/25 following scrutiny at the Joint Audit Committee meeting of the 14 March 2024.

**Police and Crime Commissioner for Dyfed-Powys**

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Nolan Principles for Conduct in Public Life.

**Signature:**

**Date:** 14th March 2024

**PURPOSE:** JOINT AUDIT COMMITTEE SCRUTINY

**Timing:** Prior to start of 2024/25 Financial Year

**Title:** Treasury Management Strategy Statement for 2024/25

**Executive Summary:** The Home Office Financial Management Code of Practice states that the Police and Crime Commissioner (Commissioner) is directly responsible for loans, investments and for borrowing money. The Chief Finance Officer of the Commissioner should decide what investments are to be made locally and approve any borrowing. Decisions on Capital Financing and Borrowing also form part of the Commissioner's responsibility.

Through locally agreed financial regulations and a Corporate Governance Framework the daily management of Loans and Investments in compliance with the approved policies are undertaken by the Police Force Director of Finance's staff.

All loans and investments should be arranged in line with best practice as embodied in the CIPFA Code of Practice on Treasury Management and all borrowing undertaken should comply with the CIPFA Prudential Code for Capital Finance in Local Authorities.

The Chartered Institute of Public Finance and Accountancy's Code of Practice for Treasury Management in Public Services requires the determination of the Treasury Management Strategy Statement (TMSS) on an annual basis. The TMSS also includes the Annual Investment Strategy that is a requirement of the Welsh Government's Investment Guidance.

CIPFA published its revised CIPFA Treasury Management Code and Prudential Code in December 2021, the new requirements have been reflected accordingly.

This document sets out the policies and procedures the Commissioner has in place for meeting these statutory requirements for the 2024/25 year.

**Recommendation:**

For consideration and comment by the Joint Audit Committee.

# Report of Chief Finance Officer of the Commissioner

## Treasury Management Strategy and Investment Policy

### 1. Purpose of Report

The Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services; Code of Practice 2021 edition* (the CIPFA code) requires the Commissioner to approve a treasury management strategy before the start of each financial year.

Treasury management is the management of the Commissioner's cash flows, borrowing and investments, and the associated risks. Currently the Commissioner has money held in cash arising from reserves and for the delivery of other operational services. These sums are invested so that they are held securely, are accessible so to provide liquidity to meet obligations and as far as the parameters of this strategy and codes of practice permit, to earn a return or interest yield.

The Commissioner 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 prudent financial management.

The Commissioner is also permitted to conditionally borrow money to achieve specific strategic goals. Borrowing brings with it a requirement to repay the debt and obligation to pay interest to the lender. There are consequential risks, revenue effects and a requirement for management attention.

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 2021 Edition* (the CIPFA Code) which requires the Commissioner to approve a treasury management strategy before the start of each financial year. In addition, the Welsh Government (WG) issued revised Guidance on Local Authority Investments in November 2019 that requires the Commissioner to approve an investment strategy before the start of each financial year. This report fulfils the Commissioner's legal obligation under the Local Government Act 2003 to have regard to both the CIPFA Code and the WG Guidance.

In accordance with the WG Guidance, the Commissioner will be asked to approve a revised Treasury Management Strategy Statement should the assumptions on which this report is based change significantly. Such circumstances would include, for example, a large unexpected change in interest rates, capital programme or in the level of investment balance, or a material loss in the fair value of a non-financial investment identified as part of the year end accounts preparation and audit process.

It is a requirement that the Commissioner's Chief Finance Officer (CFO) should implement and monitor the treasury management policies and procedures in line with the CIPFA code and other professional guidance.

## 2. Economic Background

### 2.0 Sources of Information

On behalf of the Commissioner, Dyfed-Powys Police Corporate Finance Department receives regular advice and information on the economic outlook from its treasury management advisors, Link Group, Link Treasury Services Limited (Link). This includes their views on the prospect for interest rates for both borrowing and investments. The following sections 2.1 to 2.4 have been provided by our treasury management advisors.

### 2.1 Current Economic Conditions

- The third quarter of 2023/24 saw:
  - A 0.3% m/m decline in real GDP in October, potentially partly due to unseasonably wet weather, but also due to the ongoing drag from higher interest rates. Growth for the second quarter, ending 30<sup>th</sup> September, was revised downwards to -0.1% and growth on an annual basis was also revised downwards, to 0.3%;
  - A sharp fall in wage growth, with the headline 3myy rate declining from 8.0% in September to 7.2% in October (and then 6.6% in November), although the ONS “experimental” rate of unemployment has remained low at 4.2%;
  - CPI inflation continuing on its downward trajectory, from 8.7% in April to 4.6% in October, then again to 3.9% in November before rising a little to 4% in December;
  - Core CPI inflation decreasing from April and May’s 31 years’ high of 7.1% to 5.1% in November and December, the lowest rate since January 2022;
  - The Bank of England holding Bank Rate at 5.25% in November and December (and subsequently in February 2024);
  - A steady fall in 10-year gilt yields as investors revised their interest rate expectations lower, although yields have subsequently risen somewhat in January.
- The revision of GDP data in Q2 to a 0.1% q/q fall may mean the mildest of mild recessions has begun. Indeed, real GDP in October fell 0.3% m/m which suggests that the economy weakened further in Q3. The weakness in October may partly be due to the unseasonably wet weather. That said, as the weakness was broad based it may also be the case that the ongoing drag from higher interest rates is more than offsetting any boost from the rise in real wages.
- The 0.3% m/m fall in retail sales volumes in October means that after contracting by 1.0% q/q (which was downwardly revised from -0.8% q/q) in Q2, retail activity remained weak at the start of Q3. That suggests higher interest rates are taking a bigger toll on real consumer spending.
- Higher interest rates have filtered through the financial channels and weakened the housing market but, overall, it remains surprisingly resilient with the Halifax house price index most recently (March 2024) pointing to a 1.7% year on year increase whilst Nationwide’s February data pointed to a 1.2% year on year increase. However, it should be remembered that the full weakness in real consumer spending and real business investment has yet to be felt as currently it is estimated that around two thirds to a half of the impact of higher interest rates on household interest payments has yet to filter through.

- Overall, we expect real GDP growth to remain subdued throughout 2024 as the drag from higher interest rates is protracted but a fading of the cost-of-living crisis and interest rate cuts in the second half of 2024 will support a recovery in GDP growth in 2025.
- The labour market remains tight by historical standards, but the sharp fall in wage growth seen in October will reinforce the growing belief in markets that interest rates will be cut mid-2024. Wage growth eased in October much faster than the consensus expected. Total earnings fell by 1.6% m/m, which meant the headline 3myy rate eased from 8.0% in September to 7.2% in October. This news will be welcomed by the Bank of England. Indeed, the timelier three-month annualised rate of average earnings growth fell from +2.4% to -1.2%. Excluding bonuses, it fell from 5.3% to 2.0%. Furthermore, one of the Bank's key barometers of inflation persistence, regular private sector pay growth, dropped from 7.9% 3myy to 7.3% (and then to 6.6% in November), which leaves it comfortably below the 7.2% comparator for December, as predicted by the Bank in November.
- The fall in wage growth occurred despite labour demand being stronger in October than expected. The three-month change in employment eased only a touch from +52,000 in September to +50,000 in October. But resilient labour demand was offset by a further 63,000 rise in the supply of workers in the three months to October. That meant labour supply exceeded its pre-pandemic level for the first time, and the unemployment rate remained at 4.2% in October. In the three months to November, the number of job vacancies fell for the 17<sup>th</sup> month in a row, from around 959,000 in October to around 949,000. That has reduced the vacancy to unemployment ratio as demand for labour eases relative to supply, which may support a further easing in wage growth in the coming months.
- CPI inflation fell from 6.7% in September to 4.6% in October, and then again to 3.9% in November (4.0% in December). Both these falls were bigger than expected and there are clear signs of easing in domestic inflationary pressures. The fall in core CPI inflation from 5.7% to 5.1% in November was bigger than expected (consensus forecast 5.6%). That's the lowest rate since January 2022. Some of the decline in core inflation was due to the global influence of core goods inflation, which slowed from 4.3% to 3.3%. But some of it was due to services inflation falling from 6.6% to 6.3%. The Bank views the latter as a key barometer of the persistence of inflation and it came in further below the Bank's forecast of 6.9% in its November Monetary Policy Report. This will give the Bank more confidence that services inflation is now on a firmly downward path.
- The Bank of England sprung no surprises with its December (and subsequent February) monetary policy committee (MPC) meeting, leaving interest rates at 5.25% for the third time in a row and pushing back against the prospect of near-term interest rate cuts. The Bank continued to sound hawkish, with the MPC maintaining its tightening bias saying that "further tightening in monetary policy would be required if there were evidence of more persistent inflationary pressures". And it stuck to the familiar script, saying that policy will be "sufficiently restrictive for sufficiently long" and that "monetary policy is likely to need to be restrictive for an extended period of time". In other words, the message is that the MPC is not yet willing to endorse investors' expectations that rates will be cut as soon as June 2024.
- Looking ahead, our colleagues at Capital Economics forecast that the recent downward trends in CPI and core inflation will stall over the next few months before starting to decline

more decisively again in February. That explains why we think the Bank of England won't feel comfortable cutting interest rates until H2 2024.

- The fall in UK market interest rate expectations in December drove most of the decline in 10-year gilt yields, which fell in line with 10-year US Treasury and euro-zone yields. 10-year gilt yields fell from 4.68% in October 2023 to around 3.70% in early January but have subsequently risen to a little over 4% since. Further declines are only likely to resume once softer inflation and wage data are consistently maintained.
- Investors' growing expectations that the Fed will cut interest rates in the first half of 2024 has led to an improvement in risk sentiment, which has boosted the pound and other risky assets. In addition, the rise in the pound, from \$1.21 in November to \$1.27 now, has also been supported by the recent relative decline in UK wholesale gas prices.
- The FTSE 100 index remains 5% below its record high in February 2023. Where equities have made ground, it is mostly driven by strong performances in the industrials and rate-sensitive technology sectors. But UK equities have continued to underperform US and euro-zone equities. The FTSE 100 rose by 2.2% in December, while the S&P 500 has risen by 3.8%. This is partly due to lower energy prices, which have been a relatively bigger drag on the FTSE 100, due to the index's high concentration of energy companies.

## **2.2 Monetary Policy Committee Meetings**

- On 2<sup>nd</sup> November, the Bank of England's Monetary Policy Committee (MPC) voted to keep Bank Rate on hold at 5.25%, and on 14<sup>th</sup> December reiterated that view. Both increases reflected a split vote, the latter by 6 votes to 3, with the minority grouping voting for an increase of 0.25%. On 1<sup>st</sup> February, however, although the vote was still 6 votes to 3 in favour of keeping rates on hold, 2 members voted for a rate hike and 1 for a cut.
- Nonetheless, with UK CPI inflation now at 4%, and core inflating beginning to moderate (5.1%), markets are voicing a view that rate cuts should begin in Q1 2024/25, some way ahead of the indications from MPC members. Of course, the data will be the ultimate determinant, so upcoming publications of employment, wages and inflation numbers will be of particular importance, and on-going volatility in Bank Rate expectations and the gilt yield curve can be expected.
- In addition, what happens outside of the UK is also critical to movement in gilt yields. The US FOMC has kept short-term rates in the range of 5.25%-5.50%, whilst the ECB has moved its Deposit rate to a probable peak of 4%. Markets currently expect both central banks to start cutting rates in 2024.

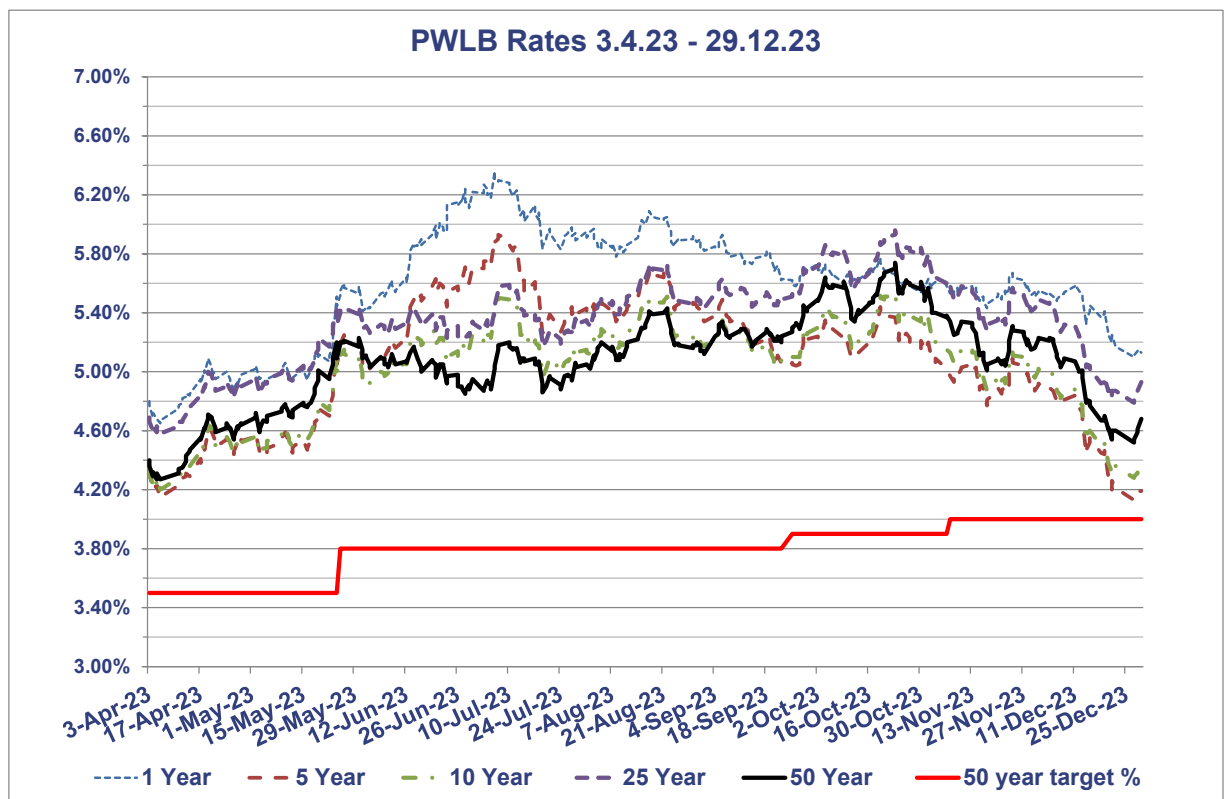
## **2.3 Interest Rates Forecast**

The table below shows the most up to date information available from the Commissioner's treasury management advisors:

Link Group Interest Rate View		05.02.24												
	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26	Mar-27	
<b>BANK RATE</b>	5.25	5.25	4.75	4.25	3.75	3.25	3.00	3.00	3.00	3.00	3.00	3.00	3.00	
3 month ave earnings	5.30	5.30	4.80	4.30	3.80	3.30	3.00	3.00	3.00	3.00	3.00	3.00	3.00	
6 month ave earnings	5.20	5.10	4.60	4.10	3.70	3.30	3.10	3.10	3.10	3.10	3.10	3.10	3.10	
12 month ave earnings	5.00	4.90	4.40	3.90	3.60	3.20	3.10	3.10	3.10	3.10	3.10	3.20	3.20	
5 yr PWLB	4.50	4.40	4.30	4.20	4.10	4.00	3.80	3.70	3.60	3.60	3.50	3.50	3.50	
10 yr PWLB	4.70	4.50	4.40	4.30	4.20	4.10	4.00	3.90	3.80	3.70	3.70	3.70	3.70	
25 yr PWLB	5.20	5.10	4.90	4.80	4.60	4.40	4.30	4.20	4.20	4.10	4.10	4.10	4.10	
50 yr PWLB	5.00	4.90	4.70	4.60	4.40	4.20	4.10	4.00	4.00	3.90	3.90	3.90	3.90	

## 2.2 Public Works Loan Board (PWLB) Borrowing Rates

In the following chart, the rise in gilt yields across the curve in the first half of 2023/24, and therein PWLB rates, with a end of year rally based on a mix of supportive domestic and international factors:



### HIGH/LOW/AVERAGE PWLB RATES FOR 3.4.23 – 29.12.23

	1 Year	5 Year	10 Year	25 Year	50 Year
<b>Low</b>	4.65%	4.13%	4.20%	4.58%	4.27%
<b>Date</b>	06/04/2023	27/12/2023	06/04/2023	06/04/2023	05/04/2023
<b>High</b>	6.36%	5.93%	5.53%	5.96%	5.74%
<b>Date</b>	06/07/2023	07/07/2023	23/10/2023	23/10/2023	23/10/2023
<b>Average</b>	5.60%	5.09%	5.03%	5.35%	5.08%
<b>Spread</b>	1.71%	1.80%	1.33%	1.38%	1.47%



## 2.5 Local Context

On 29 February 2024, the Commissioner held £10.84m of borrowing and £8m of investments. This is set out in further detail at **Appendix A**.

The impact of the Capital Programme on the balance sheet position and year on year changes are shown in the tables on the following page.

Table 1: Capital Expenditure and Financing in each year

Capital Expenditure and Financing	2022/23 Actual £m	2023/24 Estimate £m	2024/25 Estimate £m	2025/26 Estimate £m	2026/27 Estimate £m
Land & Buildings	14.646	5.597	15.985	17.933	3.985
Vehicles / Boat	1.439	1.848	2.132	1.680	1.875
ICT and Other Schemes	4.074	3.893	3.209	2.803	4.052
<b>Total Expenditure</b>	<b>20.159</b>	<b>11.338</b>	<b>21.326</b>	<b>22.416</b>	<b>9.912</b>
<b>Borrowing Requirement</b>	<b>14.336</b>	<b>2.892</b>	<b>15.985</b>	<b>17.933</b>	<b>3.985</b>
Capital Grants	0.258	0.106	0.000	0.000	0.000
Contribution from Revenue	4.339	4.230	2.718	3.243	4.093
Capital Receipts	0.252	0.821	1.084	0.294	0.050
Earmarked Reserves	0.974	3.289	1.539	0.946	1.784
<b>Total Financing</b>	<b>20.159</b>	<b>11.338</b>	<b>21.326</b>	<b>22.416</b>	<b>9.912</b>

Table 2: Capital Expenditure and Financing cumulative (Balance Sheet)

Capital Expenditure and Financing	2022/23 Actual £m	2023/24 Estimate £m	2024/25 Estimate £m	2025/26 Estimate £m	2026/27 Estimate £m
Land & Buildings	14.646	20.243	36.228	54.161	58.146
Vehicles / Boat	1.439	3.287	5.419	7.099	8.974
ICT and Other Schemes	4.074	7.967	11.176	13.979	18.031
<b>Total Expenditure</b>	<b>20.159</b>	<b>31.497</b>	<b>52.823</b>	<b>75.239</b>	<b>85.151</b>
<b>Borrowing Requirement</b>	<b>14.336</b>	<b>17.228</b>	<b>33.213</b>	<b>51.146</b>	<b>55.131</b>
Capital Grants	0.258	0.364	0.364	0.364	0.364
Contribution from Revenue	4.339	8.569	11.287	14.530	18.623
Capital Receipts	0.252	1.073	2.157	2.451	2.501
Earmarked Reserves	0.974	4.263	5.802	6.748	8.532
<b>Total Financing</b>	<b>20.159</b>	<b>31.497</b>	<b>52.823</b>	<b>75.239</b>	<b>85.151</b>

The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. The Commissioner's current strategy is to use its own resources in lieu of external borrowing where possible. This is often known as internal borrowing.

The Commissioner has an increasing CFR due to the planned expenditure described in the Capital Programme. The Commissioner will be required to borrow up to £55.131m over the forecast period.

CIPFA's Prudential Code for Capital Finance in Local Authorities recommends that the Commissioner's debt should be lower than its highest forecast CFR over the next three years.

Repayment premiums on PWLB debts are prohibitive and therefore it is more cost effective to continue to pay existing loans rather than pay them off early. In addition, the Commissioner receives a grant contribution towards the costs of pre-1990 debt financing at 51% of the costs of the remaining notional interest payments and minimum revenue repayment. The current strategy remains to carry these loans to maturity.

### **3. Borrowing Strategy**

The Commissioner currently holds £10.84m of external loans, an increase of £9.86m on the previous year, as part of its strategy for funding previous years' capital programmes. This is set out in further detail at **Appendix A**.

The Commissioner is currently maintaining an under-borrowed position. This means that the capital borrowing need, (the Capital Financing Requirement), has not been fully funded with loan debt, as cash supporting the Commissioner's reserves, balances and cash flow has been used as a temporary measure.

Given the significant cuts to public expenditure and to local government funding, the Commissioner's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. In line with advice from the treasury management advisors, given that short-term interest rates are currently high, but predicted to reduce in the near-future, it is recommended to utilise internal resources where available, or to borrow using short-term loans. Longer dated debt should only be sought if absolute certainty on long-term rates is needed and deemed to be affordable, sustainable, and prudent at the prevailing rates.

In February 2024, there was a need to address temporary cash flow shortages, and a decision was made to externalise some of our internal borrowing. Various borrowing options were explored, and following discussions with Link, a fixed rate maturity loan for £10m was arranged with the PWLB. The loan was agreed for a period of one year, at a rate of 5.47%.

#### **3.1 Sources**

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

- Public Works Loan Board (PWLB) and any successor body
- any institution approved for investments (see Section 4)
- any other bank or building society authorised to operate in the United Kingdom
- UK public and private sector pension funds (except Dyfed-Powys Pension Fund)
- capital market bond investors

- Special purpose companies created to enable local authority bond issues

In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:

- operating and finance leases
- hire purchase
- sale and leaseback

The Commissioner has previously raised all of its long-term borrowing from the PWLB but it continues to investigate other sources of finance, such as local authority loans, that may be available at more favourable rates.

### 3.2 Debt rescheduling

The PWLB allows the Commissioner to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Other lenders may also be prepared to negotiate premature redemption terms. The Commissioner may take advantage of this and replace some loans, with new loans, or repay loans without replacement, where this is expected to lead to an overall cost saving or a reduction in risk. This is unlikely to occur in the 2024/25 year as there is a large difference between premature redemption rates and new borrowing rates. However, if rescheduling is undertaken, it will be reported to the Joint Audit Committee.

## 4. Investment Strategy

The Commissioner currently holds £8.0m of invested funds, representing income received in advance of expenditure plus cash arising from held reserves. In the past 12 months, the Commissioner's investment balance has ranged between £4m and £23m. Due to the utilisation of reserves to fund the capital programme, investment balances are expected to reduce significantly during the second half of 2024/25.

Loans to organisations providing local public services and purchases of investment property are not normally considered to be treasury investments.

**Objectives:** Both the CIPFA Code and the Welsh Government Guidance require the Commissioner to invest treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return or yield. The Commissioner's objective when investing money is to strike an appropriate 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 Commissioner 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.

**Strategy:** The Commissioner's priorities are Security, Liquidity then Yield. Investments will be made first so that they are secure meaning the risk of capital loss is minimised. Next the Commissioner will maintain liquidity to meet the demands of the Capital Programme and maintain sufficient working capital to meet operational debts as they fall due. Then, as far as possible the Commissioner aims to invest in the highest yielding asset class available. This is

a modification for the strategy first adopted in 2019/20 where investment in highest yielding assets was preferred. This change reflects the reducing capital reserves, minimal availability of capital grants and capital receipts and need to utilise internal borrowing.

**Other Guiding Principles as per CIPFA Code of Practice:**

- An authority must not borrow to invest for the primary purpose of commercial return
- It is not prudent for local authorities to make any investment or spending decision that will increase the CFR, and so may lead to new borrowing, unless directly and primarily related to the functions of the authority, and where any commercial returns are either related to the financial viability of the project in question or otherwise incidental to the primary purpose
- The risks associated with service and commercial investments should be proportionate to their financial capacity – i.e. that plausible losses could be absorbed in budgets or reserves without unmanageable detriment to local services
- An annual review should be conducted to evaluate whether commercial investments should be sold to release funds to finance new capital expenditure or refinance maturing debt.

**4.1 Approved Counterparties**

The Commissioner may invest its surplus funds with any of the counterparty types in table 3 below, subject to the cash limits (per counterparty) and the time limits shown.

The combined secured and unsecured investments in any one bank will not exceed the cash limit for secured investments.

Counterparty limits will be reviewed on a quarterly basis and will be amended, if necessary, dependent on investment balances.

Table 3: Approved Investment Counterparties and Limits

Sector	Time limit	Counterparty limit	Sector limit
<b>The UK Government</b>	50 years	Unlimited	Unlimited
<b>Local authorities &amp; other government entities</b>	25 years	£3m	Unlimited
<b>Secured investments *</b>	25 years	£3m	Unlimited
<b>Banks (unsecured) *</b>	13 months	£2m	Unlimited
<b>Building societies (unsecured) *</b>	13 months	£2m	£4m

<b>Registered providers (unsecured) *</b>	5 years	£2m	£5m
<b>Money market funds *</b>	n/a	£3m	Unlimited
<b>Strategic pooled funds</b>	n/a	£3m	£15m
<b>Other investments *</b>	5 years	£2m	£3m

Definitions of the above terminology are included in **Appendix B**.

\* Minimum credit rating

Treasury investments in the sectors marked with an asterisk will only be made with entities whose lowest published long-term credit rating is no lower than A-. Where available, the credit rating relevant to the specific investment or class of investment is considered, as are counterparty credit ratings. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account.

For entities without published credit ratings, investments may be made either (a) where external advice indicates the entity to be of similar credit quality; or (b) to a maximum of £2m per counterparty as part of a diversified pool e.g. via a peer-to-peer platform.

## 4.2 Risk Assessment and Credit Ratings

Credit ratings are obtained and monitored by the Commissioner's treasury advisers, who will notify changes in ratings as they occur. 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.

Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "rating watch negative" or "credit watch negative") so that it may fall below the approved rating criteria, then only investments that can be withdrawn by 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.

The Commissioner defines "high credit quality" organisations and securities as those having a credit rating of A- or higher that are domiciled in the UK or a foreign country with a sovereign rating of AA+ or higher. For money market funds and other pooled funds "high credit quality" is defined as those having a credit rating of A- or higher.

Significant levels of downgrades to Short and Long-Term credit ratings have not materialised since the crisis in March 2020. In the main, where they did change, any alterations were limited to Outlooks. Nonetheless, when setting minimum sovereign debt ratings, the Commissioner will not set a minimum rating for the UK.

### **4.3 Other Information on the Security of Investments**

The Commissioner 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 and reports in the quality financial press. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may meet the credit rating criteria.

When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2011, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Commissioner will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Commissioner's cash balances, then the surplus will be deposited with the UK Government, via the Debt Management Office or invested in government treasury bills for example, or with other local authorities. This will cause a reduction in the level of investment income earned but will protect the principal sum invested.

### **4.4 Specified Investments**

The WG Guidance defines specified investments as those:

- denominated in pound sterling,
- due to be repaid within 12 months of arrangement unless the counterpart is a local authority,
- not defined as capital expenditure by legislation, and
- invested with one of:
  - the UK Government,
  - a UK local authority, parish council or community council, police, or fire, or
  - a body or investment scheme of "high credit quality".

### **4.5 Non-specified Investments**

Any investment not meeting the definition of a specified investment is classed as non-specified. Given the wide definition of a loan, this category only applies to units in pooled funds and shares in companies. Limits on non-specified investments are shown in table 4

below. The Commissioner confirms that its current non-specified investments remain within these limits.

Table 4: Non-Specified Investment Limits

	Current Amounts Invested £m	Cash limit (Proposed 2024/25) £m
<b>Units in pooled funds without credit ratings or rates below A-</b>	-	3.0
<b>Shares in local organisations</b>	-	4.0
<b>Maximum amount to be invested in non-specified investments</b>	-	7.0

#### 4.6 Investment Limits

The Commissioner’s revenue reserve available to cover unforeseeable investment losses (the general reserve) is forecast to be £4.862 million on 31 March 2024. The maximum that will be lent to any one organisation (other than the UK Government) will be £3 million. A group of banks under the same ownership will be treated as a single organisation for limit purposes. Limits will also be placed on fund managers, investments in brokers’ nominee accounts, foreign countries, and industry sectors as below. Investments in multilateral development banks do not count against the limit for any single foreign country since the risk is diversified over many countries.

Table 5: Investment Limits

	Cash limit £m
<b>Any single organisation, except the UK Central Government (each)</b>	3.0
<b>Any group of organisations under the same ownership (per group)</b>	3.0
<b>Any group of pooled funds under the same management (per manager)</b>	8.0
<b>Negotiable instruments held in a broker’s nominee account (per broker)</b>	8.0
<b>Foreign countries (per country)</b>	3.0

## 4.7 Liquidity Management

Detailed cash flow forecasting is undertaken to estimate the cash flow position. This will be utilised to determine the maximum period for which funds may prudently be committed. This forecast is compiled on a prudent basis, with receipts under-estimated and payments over-estimated to minimise the risk of being required to borrow on unfavourable terms to meet financial commitments.

Limits on long-term investments are set by reference to the Commissioner's Medium Term Financial Plan and cash flow forecast.

Investments are also made in T-bills and Certificates of Deposit which are liquid and can be sold in the secondary market if cash is required at short-term notice.

All investments of over 13 months will require CFO approval in advance of being made.

## 5. Treasury Management Indicators

The Commissioner measures and manages its exposures to treasury management risks using the following indicators.

### 5.1 Security

The Commissioner has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating / credit score of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

	Target
<b>Portfolio average credit rating / score</b>	A / 6

### 5.2 Liquidity

The Commissioner has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

	Target £m
<b>Total cash and money-market funds available within 3 months</b>	5.0



### 5.3 Interest Rate Exposures

This indicator is set to control the Commissioner's exposure to interest rate risk. The upper limits on fixed and variable rate interest rate exposures, expressed as the account of net principal borrowed. (Investments count as negative borrowing.)

	2024/25	2025/26	2026/27
<b>Upper limit on fixed interest rate exposure</b>	100%	100%	100%
<b>Upper limit on variable interest rate exposure</b>	100%	100%	100%

Fixed rate investments and borrowings are those where the rate of interest is fixed for at least 12 months, measured from the start of the financial year or the transaction date if later. All other instruments are classed as variable rate.

### 5.4 Maturity Structure of Borrowing

This indicator is set to control the Commissioner's exposure to refinancing risk. The upper and lower limits on the maturity structure of fixed rate borrowing will be:

	Upper	Lower
<b>Under 12 months</b>	100%	0%
<b>12 months and within 24 months</b>	100%	0%
<b>24 months and within 5 years</b>	100%	0%
<b>5 years and within 10 years</b>	100%	0%
<b>10 years and above</b>	100%	0%

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 limits have been set as wide as possible to ensure opportunities to restructure debt is not lost.

### 5.5 Principal Sums Invested for Periods Longer than a year

All investments longer than 365 days (non-specified) will be made with a cautious approach to cash flow requirements and advice from the treasury management advisors will be sought as necessary. Where the organisation invests, or plans to invest, for periods longer than a year, an upper limit is set for each forward financial year period for the maturing of such investments. The purpose of this indicator is to control the exposure to the risk of incurring losses by seeking early repayment of long-term investments. The limits on the long-term

principal sum invested to final maturities beyond the period end will be as shown in the following table:

	2024/25	2025/26	2026/27
	£m	£m	£m
<b>Limit on principal invested beyond year end</b>	8.0	6.0	4.0

The Commissioner has no current investments in excess of one year.

## 6. Other Items

There are a number of additional items that the Commissioner is obliged by CIPFA or WG to include in its Treasury Management Strategy.

### 6.1 Policy on Use of Financial Derivatives

In the absence of any legal power to do so, the Commissioner will not use standalone financial derivatives (such as swaps, forwards, futures and options). Derivatives embedded into loans and investments, including pooled funds and forward starting transactions, may be used, and the risks that they present will be managed in line with the overall treasury risk management strategy.

### 6.2 Treasury Management Practices

CIPFA recommends that organisations develop a number of treasury management practices (TMPs) that are relevant to its treasury management powers and the scope of its treasury management activities. These can be found in **Appendix C**.

### 6.3 Treasury Management Training

The CIPFA Treasury Management Code requires the CFO to ensure that all members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities. The revised Code requires for the knowledge and skills of officers and members involved in the treasury management function to be proportionate to the size and complexity of the treasury management conducted by each authority. A register of training is also to be maintained.

Further information can be found in **Appendix C - TMP 10**.

#### **6.4 Treasury Management Advisors**

The Commissioner uses Link Group, Link Treasury Services Limited as its external treasury management advisors. The current contract is due to expire at the end of June 2024 and procurement process will take place accordingly.

Further information can be found in **Appendix C - TMP 11**.

#### **6.5 Investment of Money Borrowed in Advance of Need**

Welsh Government guidance is that local authorities must not borrow more than or in advance of their needs purely in order to profit from the investment of the extra sums borrowed. The Commissioner may, from time to time, borrow in advance of need, where this is expected to provide the best long-term value for money. Since amounts borrowed will be invested until spent, the Commissioner is aware that it will be exposed to the risk of loss of the borrowed sums, and the risk that investment and borrowing interest rates may change in the intervening period. These risks will be managed as part of the Commissioner's overall management of its treasury risks.

The total amount borrowed will not exceed the authorised borrowing limit of £61.0 million. The maximum period between borrowing and expenditure is expected to be two years, although Dyfed-Powys Police is not required to link particular loans with particular items of expenditure.

#### **6.6 Financial Implications and Performance Measurement**

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

The budget for investment income in 2024/25 is £0.36 million, based on an average investment portfolio of £10.3m at an interest rate of 3.5%. If actual levels of investments and actual interest rates differ from those forecasted, performance will be monitored as part of financial management reporting.

Further information can be found in **Appendix C - TMP 2**.

## 6.7 Other Options Considered

The Welsh Government Guidance and the CIPFA Code do not prescribe any particular treasury management strategy for local authorities to adopt. The CFO believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

Alternative	Impact on income and expenditure	Impact on risk management
<b>Invest in a narrower range of counterparties and/or for shorter times</b>	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
<b>Invest in a wider range of counterparties and/or for longer times</b>	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
<b>Borrow additional sums at long-term fixed interest rates</b>	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
<b>Borrow short-term or variable loans instead of long-term fixed rates</b>	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long term costs may be less certain
<b>Reduce level of borrowing</b>	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain

## Appendix A – Existing Investment & Debt Portfolio Position

The external debt and investment position for 29 February 2024 is detailed below:

	Principal as at 1 April 2023	Principal as at 29 Feb 2024
	£m	£m
<b><u>External Borrowing – Public Works Loan Board (PWLB):</u></b>		
Short Term Borrowing	0.30	0.16
Long Term Borrowing	0.68	10.68
<b>Total External Borrowing</b>	<b>0.98</b>	<b>10.84</b>
<b><u>Treasury Investments:</u></b>		
<b><u>Deposits</u></b>		
Debt Management Office (DMO)	-	(2.0)
<b><u>Money Market Funds (MMFs)</u></b>		
<b>Federated</b>	(1.0)	(3.0)
<b>CCLA</b>	(3.0)	(3.0)
<b>Total Treasury Investments</b>	<b>(4.0)</b>	<b>(8.0)</b>
<b>NET DEBT/(INVESTMENTS)</b>	<b>(3.02)</b>	<b>2.84</b>

Payments have been made during the year in respect of principal on the pre-1990 PWLB Loans.

In February 2024, there was a need to address temporary cash flow shortages, and a decision was made to externalise some of our internal borrowing. Various borrowing options were explored, and following discussions with Link, a fixed rate maturity loan for £10m was arranged with the PWLB. The loan was agreed for a period of one year, at a rate of 5.47%.

## Appendix B – Investment Definitions

**Credit Rating:** Investment limits are set by reference to the lowest published long-term credit rating from Fitch, Moody's or Standard & Poor's. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account.

**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.

**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.

**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.

**Other Investments:** This category covers treasury investments not listed above, for example unsecured corporate bonds and company loans. Non-bank companies cannot be bailed-in but can become insolvent placing the Commissioner's investment at risk. Loans to unrated companies will only be made as part of a diversified pool in order to spread the risk widely.

**Registered Providers (Unsecured):** Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Welsh Government. As providers of public services, they retain the likelihood of receiving government support if needed.

**Reverse Purchase Agreements (Repo):** A repurchase agreement is a financial transaction where one entity (typically a bank) sells investments (bonds) to another entity (the investor) on one date and at the same time agrees to repurchase them at a fixed price on a later date. A repo involves two linked but separate transactions – the sale of bonds by the bank in return for cash, and the later repurchase of the bonds in return for a larger sum of cash.

**Money Market Funds:** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. 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 Commissioner will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times.

**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 Commissioner 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 Commissioner's investment objectives will be monitored regularly.

## **Appendix C – Treasury Management Practices (TMP)**

### **TMP1 Risk Management**

The CFO of the Commissioner will design, implement, and monitor all arrangements for the identification, management and control of treasury management risk, will report at least annually on the adequacy/suitability thereof, and will report, as a matter of urgency, the circumstances of any actual or likely difficulty in achieving the Commissioner's objectives in this respect, all in accordance with the procedures set out in *TMP6 Reporting requirements and management information arrangements*.

In respect of each of the following risks, the arrangements which seek to ensure compliance with these objectives are set out below:

#### **Credit and Counterparty Risk**

##### **Definition**

The risk of failure by a counterparty to meet its contractual obligations to the organisation under an investment, borrowing, capital, project or partnership financing, particularly as a result of the counterparty's diminished creditworthiness, and the resulting detrimental effect on the organisation's capital or current (revenue) resources.

##### **Action**

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

Counterparties are detailed within the Treasury Management Strategy and Policy.

#### **Liquidity Risk**

##### **Definition**

The risk that cash will not be available when it is needed, that ineffective management of liquidity creates additional unbudgeted costs and that the organisation's business / service objectives will be thereby compromised.

##### **Action**

It will be the function of the Director of Finance (DOF) of the Chief Constable, through the treasury management staff employed by the Chief Constable to ensure that it has adequate though not excessive cash resources, borrowing arrangements, overdraft, or standby facilities, to enable it at all times to have the level of funds available to it which are necessary for the achievement of its business / service objectives.

They will ensure that, at all times, there will be a surplus of cash and/or Money Market Funds available which can be called upon (£5m).



Robust weekly, monthly, and annual cash flow forecasting processes are in place in line with Financial Regulations and Financial Control Procedures.

## **Interest Rate Risk**

### **Definition**

The risk that fluctuations in the levels of interest rates create an unexpected or unbudgeted burden on the organisation's finances, against which the organisation has failed to protect itself adequately.

### **Action**

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

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

The Commissioner will only undertake borrowing from approved sources such as the PWLB, organisations such as the European Investment Bank and from commercial banks who are on the Commissioner's list of authorised institutions, thereby minimising legal and regulatory risk. All investment of over 13 months will need prior approval by the CFO.

## **Exchange Rate Risk**

### **Definition**

The risk that fluctuations in foreign exchange rates create an unexpected or unbudgeted burden on the organisation's finances, against which the organisation has failed to protect itself adequately.

### **Action**

Currently, Dyfed-Powys Police only invests in sterling products, hence there is no exchange rate risk.

## **Refinancing Risk**

### **Definition**

The risk that maturing borrowings, capital, project, or partnership financings cannot be refinanced on terms that reflect the provisions made by the organisation for those refinancing, both capital and current (revenue) and / or that the terms are inconsistent with prevailing market conditions at the time.

## **Action**

The CFO will ensure that borrowing, private financing, and partnership arrangements are negotiated, structured, and documented, and the maturity profile of the monies so raised are managed, with a view to obtaining offer terms for renewal or refinancing if required, which are competitive and as favourable to the Commissioner as can reasonably be achieved in the light of market conditions prevailing at the time.

It will actively manage its relationships with its counterparties in these transactions in such a manner as to secure this objective and will avoid over reliance on any one source of funding if this might jeopardise achievement of the above.”

## **Legal and Regulatory Risk**

### **Definition**

The risk that the organisation itself, or an organisation with which it is dealing in its treasury management activities, fails to act in accordance with its legal powers or regulatory requirements, and that the organisation suffers losses accordingly.

### **Action**

The CFO will ensure that all treasury management activities comply with its statutory powers and regulatory requirements, demonstrating such compliance, if required to do so, to all parties with whom it deals in such activities. In framing its credit and counterparty policy under TMP1 *credit and counterparty risk management*, it will ensure that there is evidence of counterparties’ powers, authority, and compliance in respect of the transactions they may affect with the Commissioner, particularly with regard to duty of care and fees charged.

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

## **Fraud, Error and Corruption Contingency**

### **Definition**

The risk that an organisation fails to identify the circumstances in which it may be exposed to the risk of loss through fraud, error, corruption or other eventualities in its treasury management dealings, and fails to employ suitable systems and procedures and maintain effective contingency management arrangements to these ends. It includes the area of risk commonly referred to as an operational risk.

### **Action**

The CFO and DoF will ensure that the circumstances which may expose it to the risk of loss through fraud, error, corruption, or other eventualities in its treasury management dealings are identified. Accordingly, it will employ suitable systems and procedures, and will maintain effective contingency management arrangements to these ends. Internal Audit will regularly review Treasury Management function and report to the Joint Audit Committee.

A clear, well defined reporting structure for fraud etc. is in place in the event of a systems breakdown. The insurance policy incorporates cover for fraud, error and corruption. This is documented within the Counter-fraud and Corruption policy and included within Financial Control Procedure 4.7 "Dealing with Suspected Fraud and deception."

## **Market Risk**

### **Definition**

The risk that through adverse fluctuations in the value of the principal sums an organisation borrows and invests, its stated treasury management policies and objectives are compromised, against which effects it has failed to protect itself adequately.

### **Action**

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

It will only place investments with institutions that are included on the most recent counterparty lending list approved by the appointed Treasury Advisors.

## **Environmental, Social & Governance (ESG) Considerations**

This topic is becoming a more commonplace discussion within the wider investment community. Changes to the CIPFA TM Code 2021 means that ESG will be incorporated into Treasury Management Practice 1 as follows:

"The organisation's credit and counterparty policies should set out its policy and practices relating to environmental, social and governance (ESG) investment considerations. This is a developing area, and it is not implied that the organisation's ESG policy will currently include ESG scoring or other real-time ESG criteria at individual investment level."

Organisations are therefore recommended to consider their credit and counterparty policies in light of ESG information and develop their own ESG investment policies and treasury management practices, consistent with their organisation's own relevant policies, such as environmental and climate change policies.

The lack of consistency, as well as uncertainty as to how the Treasury Management Code may develop TMP1, means that although our treasury management advisors, Link, continue to review the options and will update clients as progress is made, it is not practicable to expand broadly upon ESG matters at the current time. The Commissioner will consider the implications and await further clarification from Link and from CIPFA.

## **TMP2 Performance Measurement**

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

Accordingly, the treasury management function will be the subject of on-going analysis of the value it adds in support of the organisation's stated business or service objectives. It will be the subject of regular examination of alternative methods of service delivery, of the availability of fiscal or other grant or subsidy incentives, and of the scope for other potential improvements. The performance of the treasury management function will be measured by using the criteria set out below:

The performance measures / benchmarks for treasury management will include the following:

Performance Measure	
1	Achieving the budgeted investment income.
2	Ensuring cash balance cover of 31 days.
3	Ensuring that investments are only placed with institutions which comply with the annual Treasury Management Strategy.
4	Ensuring approved counterparty limits are adhered to.
5	Expected levels of Investments per month compared to actual level of investment.
6	Average rate of return of investments per month compared to target rate.

### **TMP3 Decision Making and Analysis**

Dyfed-Powys Police will maintain full records of its treasury management decisions and of the processes and practices applied in reaching those decisions, both for the purposes of learning from the past, and for demonstrating that reasonable steps were taken to ensure that all issues relevant to those decisions were taken into account at the time.

Decisions regarding funding, borrowing, lending and new instruments and techniques will only be made if they comply with the Treasury Management Policy and Strategy. All decisions will be open to independent scrutiny.

### **TMP4 Approved Instruments, Methods and Techniques**

Dyfed-Powys Police will undertake its treasury management activities by employing only those instruments, methods and techniques specified in the Financial Regulations and Financial Control Procedures and within the limits and parameters defined in TMP 1 Risk Management.

The Corporate Governance Framework section 7.8F gives instruction on Treasury Management and Banking arrangements and the Financial Control Procedure 2.1 *Treasury Management and Banking arrangements* specify instruments, methods and techniques approved.

## **TMP5 Organisation, Clarity and Segregation of Responsibilities and Dealing Arrangements**

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

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

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

The DOF will ensure that there are clear written statements of the responsibilities for each post engaged in treasury management, and the arrangements for absence cover. The DOF will also ensure that those engaged in treasury management will follow the policies and procedures set out and report any deviance from these to the CFO.

The DOF will ensure that there is proper documentation for all deals and transactions and that procedures exist for the effective transmission of funds and provide evidence of this where required to the CFO.

The CFO has primacy over Treasury Management functions and will ensure that adequate separation of duties exist between staff charged with undertaking Treasury Management Functions.

## **TMP6 Reporting Requirements and Management Information Arrangements**

The Authority is currently required to receive and approve, as a minimum, three main treasury reports each year, which incorporate a variety of policies, estimates and actuals.

- Prudential and treasury indicators and treasury strategy (this report) - The first, and most important report is forward looking and covers:
  - a) the capital plans, (including prudential indicators),
  - b) a minimum revenue provision (MRP) policy, (how residual capital expenditure is charged to revenue over time),
  - c) the Treasury Management Strategy, (how the investments and borrowings are to be organised), including treasury indicators, and
  - d) an Annual Investment Strategy, (the parameters on how investments are to be managed).

- A mid-year treasury management report – this is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether any policies require revision. In addition, this Authority will receive quarterly update reports; and
- An annual treasury report – This is a backward-looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

The above reports are required to be adequately scrutinised before being recommended to the Commissioner. This role is undertaken by the Joint Audit Committee.

In addition to the three major reports detailed above, from 2023/24, quarterly reporting (end of June/end of December) is also required. The CFO is required to establish procedures to monitor and report performance against all forward-looking prudential indicators at least quarterly. The CFO is expected to establish a measurement and reporting process that highlights significant actual or forecast deviations from the approved indicators. However, monitoring of prudential indicators, including forecast debt and investments, is not required to be taken to Joint Audit Committee and should be reported as part of the authority's integrated revenue, capital, and balance sheet monitoring.

### **TMP7 Budgeting, Accounting and Audit Arrangements**

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

The CFO will account for its treasury management activities, for decisions made and transactions executed, in accordance with appropriate accounting practices and standards, and with statutory and regulatory requirements in force for the time being and, in particular the CIPFA Code of Practice and Cross-Sectoral Guidance Notes for Treasury Management in Public Services. The CFO will act in accordance with the Commissioner's policy statement and TMPs and the *CIPFA: Standard of Professional Practice on Treasury Management*.

The Commissioner will ensure that auditors, and those charged with regulatory review, have access to all information and papers supporting the activities of the treasury management function as are necessary for the proper fulfilment of their roles, and that such information and papers demonstrate compliance with external and internal policies and approved practices.

Treasury Management procedures and processes will be audited in accordance with the internal audit risk-based audit strategy. Auditors will, as part of their responsibilities in auditing the Statement of Accounts, obtain independent verification from counterparties of investments held by the Commissioner.

## **TMP8 Cash and Cash Flow Management**

Unless statutory or regulatory requirements demand otherwise, all monies in the hand of Dyfed-Powys Police will be under the control of the Commissioner and will be aggregated for cash flow and investment management purposes. Cash flow projections will be prepared on a regular basis, and the CFO and DOF will ensure that these are adequate for the purposes of monitoring compliance with TMP1 *Liquidity Risk Management*.

## **TMP9 Money laundering**

The Commissioner is alert to the possibility of becoming the subject of an attempt to involve it in a transaction involving the laundering of money. Accordingly, procedures for verifying and recording the identity of counterparties and reporting suspicions will be maintained and staff involved in this will be fully trained.

Only counterparties approved by the Treasury Management consultants will be utilised. Terms and conditions are agreed between the counterparty and the Commissioner prior to the transfer of funds.

The Proceeds of Crime Act 2020 (POCA) and the related Money Laundering Regulations 2007 have also extended the Wales Audit Office auditors responsibilities. The Auditor General and his staff and contractors are required to report to the Serious and Organised Crime Agency (SOCA) where they suspect, as a result of information gained during the course of their work, that there may have been criminal acts that involve financial gain.

If any staff involved in Treasury Management have suspicions of money laundering, then this should be brought to the attention of the CFO and DOF.

## **TMP10 Training and Qualifications**

The CIPFA Treasury Management Code requires the CFO to ensure that all members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities. The revised Code requires for the knowledge and skills of officers and members involved in the treasury management function to be proportionate to the size and complexity of the treasury management conducted by each authority. A register of training is also to be maintained.

Staff who undertake treasury management duties attend relevant training events provided by appointed treasury management advisors and attend a quarterly strategy meeting. Staff also attend other relevant training events provided by recognised bodies.

The needs of staff for training in investment and treasury management are assessed as part of the staff appraisal process, Development and Assessment Profile (DAP). Also, if the responsibilities of individual members of staff change, the training needs will be reassessed. Training is received from the treasury management advisors, Link, and from other bodies, in the form of training courses and seminars. Personal development is also encouraged so individuals enhance their own knowledge through reading CIPFA guidance, publications, and research on the internet.

### **TMP11 Use of External Service Providers**

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

Dyfed-Powys Police has a contract with external treasury management advisors for the provision of advice/assistance as follows:

- Strategic advice
- Capital finance advice
- Treasury Management Policy and Strategy
- Interest Rate Forecasting and Economic Advice
- Investment Policy Advice
- Debt Advice
- Counterparty Assistance
- Seminars and training
- Website and client meetings.

### **TMP12 Corporate Governance**

The Commissioner has adopted and implemented the key recommendations of the CIPFA Code of Practice. This is considered vital to the achievement of proper corporate governance in treasury management, and the CFO and DOF will monitor and, if necessary, report upon the effectiveness of these arrangements.

The Code recommends that public service organisations state their commitment to embracing the principles of corporate governance in their Treasury Management activities, notably openness and transparency.

The Commissioner is committed to the pursuit of proper corporate governance throughout its businesses and services, and to establishing the principles and practices by which this can be achieved. Therefore, the treasury management function and its activities will be undertaken with openness and transparency, honesty, integrity, and accountability reflected in the Joint Corporate Governance Framework and Financial Control Procedures.

The organisation's Treasury Management policies and practices will be published on the internet.



## Appendix D Prudential Indicators and MRP Statement 2024/25

The Local Government Act 2003 requires the Commissioner to have regard to the Chartered Institute of Public Finance and Accountancy's *Prudential Code for Capital Finance in Local Authorities* (the Prudential Code) when determining how much money it can afford to borrow. The objectives of the Prudential Code are to ensure, within a clear framework, that the capital investment plans of local authorities are affordable, prudent, and sustainable, and that treasury management decisions are taken in accordance with good professional practice. To demonstrate that the Commissioner has fulfilled these objectives, the Prudential Code sets out the following indicators that must be set and monitored each year.

### Estimates of Capital Expenditure

The Commissioner's planned capital expenditure and financing may be summarised as follows.

Capital Expenditure and Financing	2022/23	2023/24	2024/25	2025/26	2026/27
	Actual £m	Estimate £m	Estimate £m	Estimate £m	Estimate £m
Land & Buildings	14.646	5.597	15.985	17.933	3.985
Vehicles / Boat	1.439	1.848	2.132	1.680	1.875
ICT and Other Schemes	4.074	3.893	3.209	2.803	4.052
<b>Total Expenditure</b>	<b>20.159</b>	<b>11.338</b>	<b>21.326</b>	<b>22.416</b>	<b>9.912</b>
<b>Borrowing Requirement</b>	<b>14.336</b>	<b>2.892</b>	<b>15.985</b>	<b>17.933</b>	<b>3.985</b>
Capital Grants	0.258	0.106	0.000	0.000	0.000
Contribution from Revenue	4.339	4.230	2.718	3.243	4.093
Capital Receipts	0.252	0.821	1.084	0.294	0.050
Earmarked Reserves	0.974	3.289	1.539	0.946	1.784
<b>Total Financing</b>	<b>20.159</b>	<b>11.338</b>	<b>21.326</b>	<b>22.416</b>	<b>9.912</b>

### Estimate of Capital Financing Requirement

The Capital Financing Requirement (CFR) measures the Commissioner's underlying need to borrow for a capital purpose.

Cumulative Capital Financing Requirement	31.03.23 Actual £m	31.03.24 Estimate £m	31.03.25 Estimate £m	31.03.26 Estimate £m	31.03.27 Estimate £m
<b>Total</b>	14.3	17.2	33.2	51.1	55.1

The CFR is forecast to increase considerably over the next few years as capital expenditure financed by debt outweighs resources previously put aside for debt repayment.

## Gross Debt and the Capital Financing Requirement

In order to ensure that over the medium-term, debt will only be for a capital purpose, the Commissioner should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. This is a key indicator of prudence.

Debt	31.03.23 Actual £m	31.03.24 Estimate £m	31.03.25 Estimate £m	31.03.26 Estimate £m	31.03.27 Estimate £m	31.03.28 Estimate £m
<b>Estimated External Borrowing</b>	1.0	3.9	19.9	37.8	41.8	44.4
<b>CFR &amp; 2 Years Borrowing</b>	38.4	51.1	55.2	58.1	60.9	61.4

The table above shows the Commissioner will not breach this prudential indicator.

## Operational Boundary for External Debt

The operational boundary is based on the Commissioner's estimate of most likely i.e., prudent but not worst-case scenario for external debt. It links to the Commissioner's estimates of capital expenditure, the CFR, and cash flow requirements, and is a key management tool for in-year monitoring. Other long-term liabilities comprise finance lease, Private Finance Initiative and other liabilities which are not borrowing but form part of the Commissioner's debt.

Operational Boundary	31.03.24 Estimate £m	31.03.25 Estimate £m	31.03.26 Estimate £m	31.03.26 Estimate £m	31.03.27 Estimate £m
<b>Borrowing</b>	25.0	35.0	55.0	70.0	80.0
<b>Other long-term liabilities</b>	1.0	1.0	1.0	1.0	1.0
<b>Total Debt</b>	26.0	36.0	56.0	71.0	81.0

## Authorised Limit for External Debt

The authorised limit is the affordable borrowing limit determined in compliance with the Local Government Act 2003. It is the maximum amount of debt that the Commissioner can legally owe. The authorised limit provides headroom over and above the operational boundary for unusual cash movements.

Authorised Limit	2023/24 Limit £m	2024/25 Limit £m	2025/26 Limit £m	2026/27 Limit £m	2027/28 Limit £m
<b>Borrowing</b>	60.0	65.0	75.0	80.0	85.0
<b>Other long-term liabilities</b>	1.0	1.0	1.0	1.0	1.0
<b>Total Debt</b>	61.0	66.0	76.0	81.0	86.0

### Ratio of Financing Costs to Net Revenue Stream

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs. This indicator shows financing costs in the context of the entire budget.

This is scheduled to increase over the period due to the requirement to undertake borrowing to support the investment required, as a result of the Capital Programme. The impact of borrowing to fund the capital programme can be seen in later years.

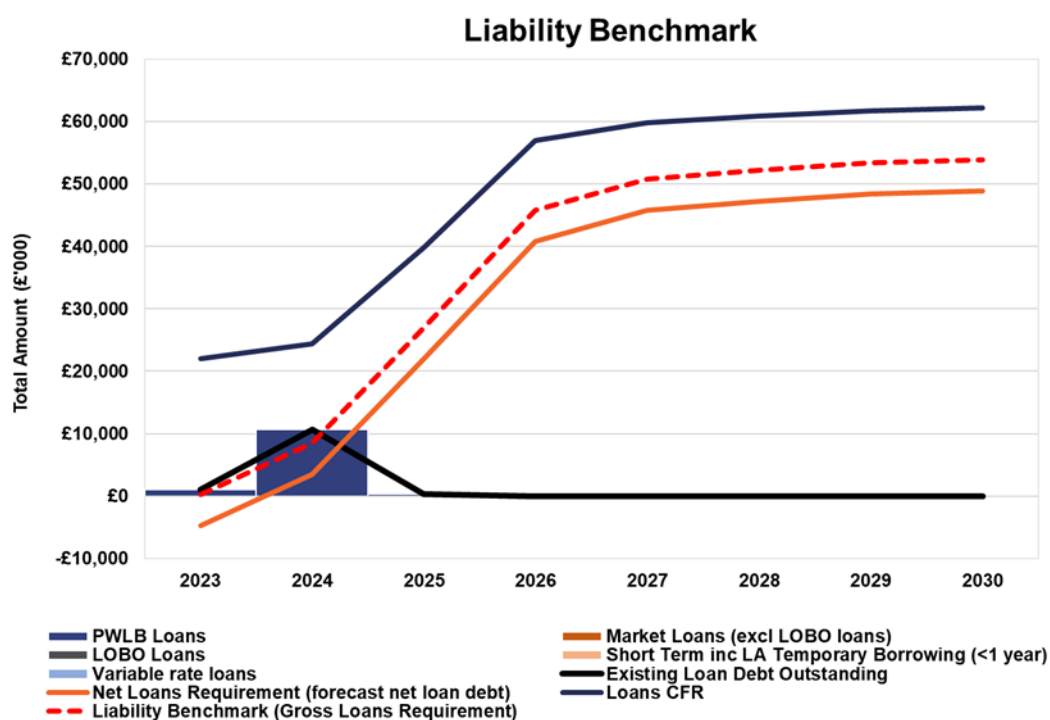
	2023/24 Estimate £m	2024/25 Estimate £m	2025/26 Estimate £m	2026/27 Estimate £m	2027/28 Estimate £m
<b>Financing Costs</b>	0.11	0.52	1.19	1.51	1.64
<b>Net Revenue Stream</b>	133.7	142.1	147.4	153.1	159.6
<b>Ratio</b>	0.08%	0.37%	0.81%	0.99%	1.03%

## Liability Benchmark (LB)

This was a new prudential indicator for 2023/24. CIPFA requires the LB to be measured for the forthcoming financial year and the following two financial years, as a minimum.

There are four components to the LB:

1. Existing loan debt outstanding – the Authority’s existing loans that are still outstanding in future years;
2. Loans CFR – this is calculated in accordance with the loans CFR definition in the Prudential Code and projected into the future based on approved prudential borrowing, and planned MRP;
3. Net loans requirement – this will show the Authority’s gross loan debt less treasury management investments at the last financial year-end, projected into the future and based on its approved prudential borrowing, planned MRP and any other major cash flows forecast; and
4. Liability benchmark (or gross loans requirement) – this equals net loans requirement plus short-term liquidity allowance.



In 2022/23 the liability benchmark starts slightly below the existing loan debt maturity portfolio, which indicates no additional borrowing need at that time, and signifies that the Commissioner had surplus cash in excess of liquidity requirements, that required investing.

However, from 2023/24, the liability benchmark indicates that the Commissioner has a borrowing need. The chart helps to identify the loans required to match those future liabilities of £50m by 2029/30, in line with the Commissioner’s planned prudential borrowing.

The new borrowing of £10m referred to in **Appendix A** can be seen on the chart. The loan was taken out for a period of one year and will be repaid in February 2025.

## **Annual Minimum Revenue Provision Statement 2024/25**

Where the Commissioner finances capital expenditure by debt, it must put aside resources to repay that debt in later years. The amount charged to the revenue budget for the repayment of debt is known as Minimum Revenue Provision (MRP) although there has been no statutory minimum since 2008. The Local Government Act 2003 requires the Commissioner to have regard to the Welsh Government's Guidance on Minimum Revenue Provision.

The broad aim of the WG guidance is to ensure that debt is repaid that is either reasonably commensurate with that over which the capital expenditure provides benefits or, in the case of borrowing supported by Government Revenue Support Grant, reasonably commensurate with the period implicit in the determination of that grant.

The WG guidance requires the Commissioner to approve an annual MRP statement each year and recommends a number of options for calculating a prudent amount of MRP.

The policy will still be used to estimate future MRP charges to the revenue account for future years which will be reflected within the Medium-Term Financial Plan and capital programme.

### **ANNUAL MINIMUM REVENUE PROVISION (MRP) STATEMENT**

The following policy has been set by the Commissioner in relation to MRP for 2024/25.

#### **Prudential Borrowing - Depreciation Method**

MRP is to be equal to the provision required in accordance with depreciation accounting in respect of the asset on which expenditure has been financed by prudential borrowing or unsupported credit arrangements. This reflects the useful life of the asset which has been estimated at 50 years in respect of Estates assets, 10 years in respect of IT infrastructure assets (e.g. Control Room, RMS) and 5 years for other IT assets.

(a) MRP will continue to be made annually until the cumulative amount of such provision is equal to the expenditure originally financed.

(b) On disposal of the asset, the amount of the capital receipt will not be taken to the revenue account and the Commissioner will comply with the normal requirements of the 2003 Act on the use of capital receipts.

(c) Where the percentage of the expenditure on the asset financed by prudential borrowing or unsupported credit arrangements is less than 100%, MRP will be equal to the same percentage of the provision required under depreciation accounting.