Report of the Deputy Chief Executive

TREASURY MANAGEMENT AND PRUDENTIAL INDICATORS - ANNUAL REPORT FOR THE YEAR ENDED 31 MARCH 2019

1. Purpose of report

To inform the Committee of treasury management activity and the actual prudential indicators for 2018/19.

2. Detail

This report meets the requirements of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. The Council is required to comply with both Codes through regulations issued under the Local Government Act 2003.

During 2018/19 the minimum reporting requirements were that an annual treasury management strategy be approved in advance of the year, a mid year report and finally an annual report be produced following the year describing the activity compared to the strategy. This report fulfils this requirement.

The CIPFA Code of Practice on Treasury Management required the Section 151 Officer to operate the treasury management function in accordance with the treasury management strategy approved at the Council meeting of 7 March 2018. Details of all borrowing and investment transactions for 2018/19 together with the balances at 31 March 2019 and treasury management limits on activity are also provided in appendix 1. All treasury management activities undertaken during the year complied fully with the CIPFA Code of Practice on Treasury Management and the approved treasury management strategy.

Under the CIPFA Prudential Code for Capital Finance in Local Authorities, the Council is required to prepare a number of prudential indicators against which treasury management performance should be measured. Performance against prudential indicators is given in appendix 2.

The CIPFA Prudential Code for Capital Financing in Local Authorities was revised in December 2017 and introduced a requirement for the production of a Capital Strategy. This is considered alongside the Treasury Management Strategy Statement and the Investments Strategy by this Committee as part of the Budget Proposals and Associated Strategies report in February each year before being presented to full Council for approval in March

Recommendation
The Committee is asked to NOTE the annual report for the year ended 31 March 2019.

Background papers
Nil

APPENDIX 1

1. Borrowing

a) Debt Outstanding and Transactions during the Year

Loan debt outstanding as at 31 March 2019 together with comparative figures for 31 March 2018 is summarised in the table below:

	Amount Outstanding at 31 March 2019 £	Amount Outstanding at 31 March 2018 £
Short Term Loans	14,521,750	15,696,980
Long Term Loans:		
Public Works Loan Board	79,779,610	79,789,061
Local Authorities	0	0
Barclays Bank	3,000,000	3,000,000
	97,301,360	98,486,041

b) Short Term Loans

The movement in short term loans from other local authorities during the year is set out in the table below:

Lender	Balance at 31 March 2018 (£)	Start Date	End Date	Rate (%)	Balance at 31 March 2019 (£)
Hounslow LBC	2,000,000	29 May 2016	29 May 2018	0.85	-
Vale of Glamorgan	2,000,000	5 February 2017	19 April 2018	0.50	-
South Northamptonshire Council	2,000,000	18 September 2017	18 June 2018	0.36	-
Lancaster City Council	1,000,000	18 September 2017	28 September 2018	0.40	-
Bolsover District Council	2,000,000	29 September 2017	29 June 2018	0.36	-
Tendring District Council	2,000,000	2 October 2017	2 July 2018	0.35	-
Wokingham Borough Council	2,000,000	27 November 2017	8 August 2018	0.35	-
Hyndburn	1,000,000	20	19	0.62	-

Borough Council		December 2017	December 2018		
Tendring District Council	1,000,000	28 February 2018	28 August 2018	0.52	-
Fylde Borough Council (£1,000,000)	-	19 April 2018	19 November 2018	0.60	-
Craven District Council (£1,000,000)	-	19 April 2018	19 November 2018	0.60	-
Wealden District Council (£2,000,000)	-	29 June 2018	2 January 2019	0.65	-
Tendring District Council (£1,000,000)	-	24 September 2018	25 March 2019	0.75	-
Fylde Borough Council	-	19 April 2018	25 September 2019	0.95	2,000,000
Hyndburn Borough Council	-	18 May 2018	17 May 2019	0.87	1,000,000
West Yorkshire Police and Crime Commissioner	-	2 July 2018	17 May 2019	0.80	2,000,000
Tendring District Council	-	31 July 2018	30 July 2019	0.75	2,000,000
Rushcliffe Borough Council	-	28 August 2018	27 August 2019	0.75	1,000,000
Northern Ireland Housing Executive	-	19 November 2018	20 May 2019	0.90	2,000,000
Ryedale District Council	-	19 December 2018	19 December 2019	1.05	1,000,000
Tendring District Council	-	2 January 2019	2 July 2019	0.95	2,000,000
North West Leicestershire District Council	-	1 February 2019	1 August 2019	0.92	1,000,000
TOTAL	15,000,000				14,000,000

Short term loans outstanding at 31 March 2019 included £512,299 invested with the Council by the Bramcote Crematorium Joint Committee at 31 March 2019. The equivalent figure was £688,457 as at 31 March 2018.

Short term loans outstanding at 31 March 2019 also include nominal PWLB annuities totalling £9,451. The equivalent figure at 31 March 2018 was £8,523. A sum of £4,152 was repaid on 13 September 2018 with £4,371 repaid on 13 March 2019.

c) Long Term Loans

The majority of the loans from the PWLB is comprised of the £66.446m borrowed on 28 March 2012 as part of the reform of council housing finance.

No new loan term loans were received from the PWLB in 2018/19. The change in long term PWLB loans over the year reflects the fact some PWLB annuity loans that were regarded as long term at 31 March 2018 were classified as short term at 31 March 2019 as they will be repaid in the next twelve months.

The Council has a loan of £3.0m at 4.19% with Barclays Bank that is due to mature on 4 February 2073.

d) Borrowing Strategy 2018/19

Overall, debt was kept under review in order to match the level of borrowing with the financing requirement for assets, based on analysis of the Council’s balance sheet with the aim of maintaining the Council’s borrowing at the most efficient level in line with the prudential framework for capital finance.

The approved budget for 2018/19 indicated that further borrowing of £3,438,000 would be required to help fund the 2018/19 capital programme. This additional borrowing was not required, largely as a consequence of slippage of schemes in the 2018/19 capital programme into the following year.

e) Debt Profile

The Council's debt had an average of 9.22 years to maturity at 31 March 2019 (31 March 2018 – 9.97 years). The average interest rate payable at that date was 3.00% (31 March 2018 – 2.91%).

The one-off preferential rates offered by the PWLB for the £66.446m additional loans taken out in March 2012 as part of the reform of council housing finance and the maturity profiles for these loans have a significant impact upon both the average interest rate payable and the debt profile.

f) Debt Restructuring

The Section 151 Officer in association with the Council's treasury management advisors carefully scrutinises the Council's loan portfolio to identify potential opportunities to achieve a reduction in risks and/or savings in interest costs by prematurely repaying loans and refinancing them on similar or different terms.

No suitable debt restructuring opportunities were identified in 2018/19 as the cost associated with the high premiums payable on the premature repayment of leans, ranging from 8% to 80% of the loan principal amount, was not outweighed by lower refinancing rates.

3. Investments

a) Investment Policy

The Council's investment policy is governed by MHCLG Guidance and was incorporated in the annual investment strategy approved at the Council meeting on 7 March 2018. The investment activity during 2018/19 conformed to the approved strategy with security of capital being the Council's main investment objective.

Counterparty credit quality was assessed and monitored with reference to credit ratings and other available information. The minimum long-term counterparty credit rating determined for the 2018/19 investment strategy was A- (or equivalent) across the Fitch, Standard and Poor and Moody's credit rating agencies.

In keeping with the MHCLG Guidance, the Council sought to maintain a sufficient level of liquidity through the use of money market funds (MMFs) and overnight deposit/call accounts. The Council had no liquidity difficulties in 2018/19.

The Council attempted to optimise returns commensurate with its objectives of security and liquidity.

b) Interest Received

The total interest receivable for the year amounted to £236,820 (2017/18 - £171,703) and included £14,400 in respect of an investment in a Local Authority Mortgage scheme (LAMS). In addition, investment interest of £85,480 was received in 2018/19 from investments totalling £2.0m made in the Local Authorities Property Fund (LAPF) in 2015/16.

A long term investment of £2.0m was made in January 2019 into the CCLA Diversified Income Fund. Investment interest attributable to this was £16,307 to 31 March 2019.

The table in 3 (d) includes details of the changes in the average life of investments during 2018/19.

The average interest rate received on investments was 1.33% in 2018/19 compared to 1.03% in 2017/18. The United Kingdom bank rate increased from 0.50% to 0.75% with effect from August 2018. Short term money market rates also remained at low levels and this had a significant impact upon the level of investment income. The average 3 month LIBID (London Interbank Bid) rate during 2018/19 was 0.67%, the 6 month LIBID rate averaged 0.79% and the 1 year LIBID rate averaged 0.94%. The rates of return on the Council's investments reflect prevailing market conditions and the Council's objective of optimising returns commensurate with the principles of security and yield.

c) Investments Placed

A summary of all investments placed during 2018/19 is set out in the table below.

	Balance at 01/04/2018 £000s	Investments Made £000s	Investments Repaid £000s	Balance at 31/03/2019 £000s	Increase/ Decrease in Investments
UK Banks and Building Societies					
Barclays	275	-	(145)	130	(145)
Santander UK	160	9,000	(9,160)	-	(160)
Lloyds	-	2,000	-	2,000	2,000
Bank of Scotland	-	12,000	(12,000)	-	-
Goldman Sachs	-	2,000	(2,000)	-	-
Other Local Authorities					
Forest of Dean DC	2,000	-	(2,000)	-	(2,000)
Blackpool BC	2,000	-	(2,000)	-	(2,000)
East Dunbartonshire	2,000	-	(2,000)	-	(2,000)
Rhondda Cynon Taff CBC	-	1,000	(1,000)	-	-
Money Market Funds					
Aberdeen MMF	-	16,875	(14,145)	2,730	2,730
Federated MMF	-	15,330	(11,510)	3,820	3,820
LGIM MMF	580	32,630	(33,210)	-	(580)
Insight MMF	2,160	23,205	(25,365)	-	(2,160)
Royal London Cash Plus	2,000	-	-	2,000	-
CCLA Diversified Income Fund	-	2,000	-	2,000	2,000
CCLA Property Fund	2,000	-	-	2,000	-
Total	**13,175**	**116,040**	**(114,535)**	**14,680**	**1,505**

Investments with counterparties such as Santander UK and Money Market Funds are set up as individual accounts where funds can be placed short-term (often overnight) and monies withdrawn as and when required. This has a major impact upon the number of investments made with these institutions during the year.

Whilst the Council took advantage of the opportunity to invest with other local authorities during 2018/19, there were no investments with other local authorities at 31 March 2019.

d) Credit Score Analysis

Counterparty credit quality has been maintained during 2018/19 as demonstrated by the quarterly credit score analysis figures shown in the following table:

Date	Value Weighted Average Credit Risk Score	Value Weighted Average Credit Rating	Time Weighted Average Credit Risk Score	Time Weighted Average Credit Rating	Average Life of Investments (Days)
31/03/2018	4.10	AA-	3.64	AA-	27
30/06/2018	4.93	A+	5.16	A+	34
30/09/2018	4.84	A+	4.57	A+	31
31/12/2018	4.78	A+	5.04	A+	33
31/03/2019	4.64	A+	4.66	A+	14

The value weighted average reflects the credit quality of investments according to the size of the deposit. The time weighted average reflects the credit quality of investments according to the maturity of the deposit.

The table below shows how the credit risk scores are related to credit ratings.

Long-Term Credit Rating	Score
AAA	1
AA+	2
AA	3
AA-	4
A+	5
A	6
A-	7
BBB+	8
BBB	9
BBB-	10

The Council aimed to achieve an average score of 5 or lower in order to reflect its overriding priority of maintaining the security of any sums invested. The minimum credit rating threshold of A- for investment counterparties as set out in the 2018/19 investment strategy equates to a score of 7. The tables above show that the Council achieved the targets for the average credit risk score and credit rating throughout 2018/19.

4. Treasury Management Limits on Activity

There are four treasury management indicators that were previously prudential indicators. The indicators are:

- Upper limits on fixed rate exposure – This indicator identifies a maximum limit for fixed interest rates based upon the debt position net of investments.

- Upper limits on variable rate exposure – Similar to the previous indicator this covers a maximum limit on variable interest rates.

- Maturity structures of fixed rate borrowing – These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing and are required for upper and lower limits.

- Total principal funds invested for periods longer than 364 days – These limits aim to reduce the risk of long-term investments needing to be realised before their natural maturity dates due to cash flow requirements, which could result in the investment being realised when market conditions are unfavourable.

The purpose of these indicators is to contain the activity of the treasury function within certain limits, thereby reducing the risk of an adverse movement in interest rates impacting negatively on the Council's overall financial position.

	2018/19 Planned Upper		**2018/19 Actual 31 March 2019**	
Limits on fixed interest rates	100%		85%	
Limits on variable interest rates	40%		15%	
Maturity Profile of Borrowings				
	Lower	**Upper**	**Lower**	**Upper**
Under 12 months	0%	50%	0%	15%
12 months to 2 years	0%	50%	0%	0%
2 years to 5 years	0%	50%	0%	18%
5 years to 10 years	0%	75%	0%	43%
10 years to 20 years	0%	100%	0%	18%

20 years to 30 years	0%	100%	0%	0%
30 years to 40 years	0%	100%	0%	3%
40 years to 50 years	0%	100%	0%	0%
50 years and above	0%	100%	0%	3%

* The CIPFA Prudential Code for Capital Finance in Local Authorities requires indicators to be set for the maturity structure of fixed borrowing only. The above limits applied equally to total borrowing (fixed and variable borrowing).
As suggested in the CIPFA Code of Practice on Treasury Management, all investments (whether fixed or variable rate) with a period of less than twelve months to maturity are regarded as variable rather than fixed rate investments as they are potentially subject to movements in interest rates when they mature. Likewise, any fixed rate borrowing that is due to mature within twelve months is regarded as being at a variable rate as the rate to be paid on any replacement loan could differ from the rate currently being paid.

With regard to the total principal funds invested, the investment strategy 2018/19 proposed that investments would only be made with those institutions on the counterparty list that were viewed as presenting the least risk. The investment strategy 2018/19 set an upper limit for total principal funds invested over 364 days of £6 million based upon 40% of an estimated in-year average of total investments of £15 million.

At 31 March 2019 the Council's investments over 364 days totalled £4.0m. This consists of £2.0m invested in the Royal London Enhanced Cash Plus Fund and £2.0m in the Local Authorities Property Fund (LAPF).

5. Regulatory Framework, Risk and Performance

The Council has complied with all of the relevant statutory and regulatory requirements which require the Council to identify and, where possible, quantify the levels of risk associated with its treasury management activities. In particular, the Council's adoption of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities means that its capital expenditure is prudent, affordable and sustainable and that its treasury management practices demonstrate a low risk approach.

6. Money Market Brokers

The Treasury Management Strategy Statement 2019/20 to 2021/22 approved by Finance and Resources Committee on 14 February 2019 and then by Council on 6 March 2019 included details of the external money market brokers to be used by the Council. The Council will now also use the services of the following broker where appropriate:

Imperial Treasury Services
25 St Andrew Street
Hertford
SG14 1HZ

7. Banking Services

Cabinet on 4 November 2014 resolved that a contract for the provision of banking services be awarded to Barclays Bank for four years from 1 April 2015 with the option to extend this for a further two years. As the performance of Barclays Bank is considered to have met expectations as set out in the contract, the Council has taken advantage of this option to extend the contract to 31 March 2021. A tender exercise will be undertaken during 2020/21 to determine the provider of banking services to the Council from 1 April 2021.

APPENDIX 2

Prudential Indicators

1. Introduction

The Local Government Act 2003 requires local authorities to comply with the CIPFA Prudential Code for Capital Finance in Local Authorities when carrying out their capital budgeting and treasury management activities. Fundamental to this is the calculation of a number of prudential indicators, which provide the basis for the management and monitoring of capital expenditure, borrowing and investments. The indicators are based on the Council's planned and actual capital spending.

2. Capital Expenditure and Financing 2018/19

The Council undertakes capital expenditure on assets which have a long term value. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc) which has no resulting impact upon the Council's borrowing need; or

- If insufficient financing is available or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

The actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed.

	2017/18 Actual £000s	**2018/19 Estimate £000s**	**2018/19 Actual £000s**
General Fund	1,858	4,987	2,767
HRA	4,645	6,304	5,696
Total Capital Expenditure	**6,503**	**11,291**	**8,463**
Financed by:			
Capital Receipts	157	2,941	796
Capital Grants	740	1,523	1,434
Revenue	5,162	6,048	5,845
Unfinanced Capital Expenditure	**444**	**779**	**388**

Further details of capital spending for 2018/19 are reported separately on this agenda.

3. The Council's Overall Borrowing Need

The Council's underlying need to borrow is called the Capital Financing Requirement (CFR). This figure is a gauge of the Council's debt position and represents net capital expenditure in 2018/19 and prior years that has not yet been paid for by revenue or other resources.

Part of the Council's treasury management activity seeks to address this borrowing need, either through borrowing from external bodies or utilising temporary cash resources within the Council.

Whilst additional borrowing can be undertaken or existing loans repaid at any time within the confines of the treasury management strategy, the Council is required by statute to make an annual revenue charge to reduce the CFR. This charge is effectively a repayment of the General Fund borrowing need and is known as the minimum revenue provision (MRP).

The total CFR can also be reduced by:

- The application of additional capital resources (such as unapplied capital receipts); or
- Charging more than the statutory revenue charge (MRP) each year through a voluntary revenue provision (VRP)

The Council's 2018/19 MRP Policy (as required by MHCLG Guidance) was approved at the Council meeting on 7 March 2018. For expenditure incurred before 1 April 2008, the General Fund MRP was based upon 4% of the CFR at that date utilising a reducing balance approach. For all unsupported borrowing incurred from 1 April 2008, the MRP was based upon the estimated life of the assets that the borrowing was intended to finance using an annuity based as opposed to equal instalment approach to more accurately reflect the time value of money.

There is no statutory requirement to charge MRP to the HRA. However, an authority can charge VRP to the HRA should it wish to do so. The Council meeting on 7 March 2018 determined that no VRP was to be charged to the HRA in 2018/19.

As agreed by Policy and Performance Committee on 12 December 2018 and Finance and Resources Committee on 13 December 2018, the former Beeston Market site on Willoughby Street was appropriated from the General Fund to the HRA at a value of £105,000. This had the effect of increasing the HRA CFR by £105,000 and reducing the General Fund CFR by the same amount. The site is to be used for the construction of two dementia friendly bungalows to be added to the Council's housing stock.

The Council's CFR for 2018/19 represents a key prudential indicator and is shown below.

Capital Financing Requirement (CFR)	**General Fund £000s**	**HRA £000s**	**Total £000s**
Opening Balance at 1 April 2018	**18,566**	**81,330**	**99,896**
Add: Unfinanced Capital Expenditure 2018/19 (per above)	388	0	388
Less: MRP/VRP in 2018/19	(664)	0	(664)
Add/Less: Transfer of former Beeston Market	(105)	105	0
Closing Balance at 31 March 2019	**18,185**	**81,435**	**99,620**

4. Treasury Position at 31 March 2019

Whilst the Council's gauge of its underlying need to borrow is the CFR, the Section 151 Officer can manage the Council's actual borrowing position by either:

- Borrowing to the CFR; or
- Choosing to utilise some temporary internal cash flow funds in lieu of borrowing (under borrowing); or
- Borrowing for future increases in the CFR (borrowing in advance of need)

The figures in this report are based upon the principal amounts borrowed and invested and so may differ from those in the final accounts by items such as accrued interest.

The Section 151 Officer managed the debt position in 2018/19 by, on occasions, choosing to utilise some temporary internal cash flow funds in lieu of additional borrowing.

The treasury position at 31 March 2019 compared with the previous year was:

Actual Borrowing Position	**31 March 2018**		**31 March 2019**	
	Principal £000s	**Average Rate**	**Principal £000s**	**Average Rate**
Fixed Interest Rate Debt	98,486	2.89%	97,301	2.98%
Variable Interest Rate Debt	0	0.0%	0	0.0%
Total Debt	**98,486**	**2.89%**	**97,301**	**2.98%**
Capital Financing Requirement				
CFR – General Fund	18,566		18,290	
CFR – HRA	81,330		81,330	
Total Capital Financing Requirement	**99,896**		**99,620**	
Over/(Under) Borrowing	**(1,410)**		**(2,319)**	

5. Prudential Indicators and Compliance Issues

Some of the prudential indicators provide either an overview or specific limits on treasury management activity. These are as follows:

i) Gross Borrowing and the Capital Financing Requirement (CFR)

In order to ensure that over the medium term gross borrowing will only be for a capital purpose, the Council needs to ensure that its gross borrowing does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional increases to the CFR for the current and the following two financial years. This allows some flexibility for limited early borrowing for future years but ensures that borrowing is not undertaken for revenue purposes. The table below highlights the Council's gross borrowing position against the CFR.

	31 March 2018 Actual	31 March 2019 Planned	31 March 2019 Actual
	£'000	**£'000**	**£'000**
Gross Borrowing			
- PWLB and Market	97,798	94,789	96,789
- Bramcote Crematorium	688	571	512
Gross Borrowing Position	**98,486**	**95,360**	**97,301**
Capital Financing Requirement (CFR)			
CFR – General Fund	18,566	18,706	18,290
CFR – HRA	81,330	81,330	81,330
Total CFR	**99,896**	**100,036**	**99,620**

The Section 151 Officer can report that gross borrowing was below the CFR at 31 March 2019 as it was at 31 March 2018. Gross borrowing in terms of PWLB loans remained largely unchanged throughout 2018/19 with the only movement being the repayment of some PWLB annuity loans. There was a reduction in market loans during the early part of 2018/19 as maturing loans did not need to be replaced. However, as set out in appendix 1, additional borrowing was undertaken later in 2018/19 to bring greater alignment between the overall borrowing level and the Council's underlying need to borrow as measured by the CFR as well as for cash flow purposes. The decrease in borrowing from Bramcote Crematorium over 2018/19 reflects the reduction in their surplus when compared with the previous year.

The CFR decreased by £0.276m during 2018/19 due to unfinanced capital expenditure of £0.388m in the year less MRP of £0.664m as set out in 3 above.

As stated above, gross borrowing at 31 March 2019 was below the CFR and it is anticipated that gross borrowing will continue to be below the CFR over the current and following two financial years. Any borrowing decisions will take account of the effect upon the total CFR.

ii) Authorised Limit and Operational Boundary for External Debt

The authorised limit is a statutory limit determined under section 3 (1) of the Local Government Act 2003 and represents the limit beyond which borrowing is prohibited. It reflects the level of borrowing which could be afforded in the short term to maximise treasury management opportunities and cover temporary cash flow shortfalls, but is unlikely to be sustainable over the longer term. The table below demonstrates that during 2018/19 the Council has maintained gross borrowing within its authorised limit.

The operational boundary is based on the probable external debt during the course of the year. The operational boundary is not a limit and actual borrowing can vary around the levels shown for short times. The operational boundary should act as an indicator to ensure the authorised limit is not breached and is a key management tool for in year monitoring of treasury management activities by the Section 151 Officer.

Actual external debt is gross borrowing plus other long-term liabilities. As mentioned previously, gross borrowing includes sums invested with the Council by Bramcote Crematorium. Other long-term liabilities are liabilities outstanding (other than borrowing) in relation to the financing of capital expenditure. They relate to, for example, private finance initiative (PFI) credits or finance leases. The Council did not have such long-term liabilities at 31 March 2019 or at any stage during 2018/19.

	Operational Boundary 31 March 2019 £000	**Authorised Limit 31 March 2019 £000**	**Actual External Debt 31 March 2019 £000**
Borrowing	**96,150**	**120,200**	**97,301**
Other Long-Term Liabilities	**0**	**0**	**0**
Total	**96,150**	**120,200**	**97,301**

The Section 151 Officer reports that, whilst the operational boundary was exceeded during 2018/19, there were no breaches of the authorised limit during the year. The maximum level of borrowing during 2018/19 was £98.6m.

iii) Total Principal Sums Invested over 364 Days

This limit is intended to contain exposure to the possibility of any loss that may arise as a result of the Council having to seek early repayment of any investments made. If an investment has to be re-paid before its natural maturity date due to cash flow requirements then, if market conditions are unfavourable, there could be an adverse impact upon the Council.

The Council's policy for 2018/19 as set out in the annual investment strategy was to retain the flexibility to invest a proportion of its available balances for a period in excess of 364 days should credit conditions continue to show signs of stabilisation or improvement. An upper limit of £6.0m for these investments was set based upon 40% of an estimated in-year average of total investments of £15.0m. Details of investments made for a period greater than 364 days are set out in section 3 of appendix 1.

iv) Adoption of the CIPFA Code of Practice on Treasury Management

As per the requirements of the CIPFA Prudential Code for Capital Finance in Local Authorities, the Council adopted the CIPFA Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes at the cabinet meeting of 26 February 2002. The CIPFA Code of Practice on Treasury Management was initially revised in 2009 and then revised again in 2011 to reflect recent developments and anticipated regulatory changes relating to the Localism Act 2011 including housing finance reform and the introduction of the General Power of Competence. The Council has incorporated the changes from the latest revised CIPFA Code of Practice on Treasury Management into its treasury management policies, procedures and practices. All treasury management activity complies with relevant statute, guidance and accounting standards.

v) The Ratio of Financing Costs to Net Revenue Stream

This indicator as shown in the table below compares net financing costs (borrowing costs less investment income) to net revenue income from revenue support grant, business rates, council tax and rent income. The purpose of the indicator is to show how the proportion of net income used to pay for financing costs is changing over time.

	2017/18 Actual	**2018/19 Revised**	**2018/19 Actual**
General Fund	2.9%	11.3%	10.7%
HRA	14.6%	14.9%	15.1%

The actual ratio of General Fund financing costs to net revenue stream was unusually lower in 2017/18 following the review of the MRP policy by the Council's treasury management advisers (Arlingclose) that found, among other items, a significant overprovision for MRP in previous years in respect of borrowing before the introduction of new regulations in 2008. This was corrected in 2017/18 and resulted in a significant one-off adjustment.

The actual ratios in 2018/19 were broadly similar to those in 2016/17 and previous years.