

Item No. on Agenda

Report to the Police Fire and Crime Panel – 3rd February 2025

Treasury Management Strategy Report 2025/26

Report of the Staffordshire Commissioner

1. Background

- 1.1 In addition to the existing role overseeing Staffordshire Police, the Staffordshire Commissioner became responsible for the governance of the Staffordshire Fire and Rescue Service from August 2018. However, both remain separate organisations, with separate budgets and governance processes.
- 1.2 This report will detail the Treasury Management Strategy for Staffordshire Police only; a separate report has been completed for the Staffordshire Fire and Rescue Service. Therefore, reference is made only to the **Staffordshire Police and Crime Commissioner ('the Commissioner')** as part of this report.

2. Introduction

- 2.1 This report outlines the Commissioner's Treasury Management Strategy for 2025/26.
- 2.2 Treasury management comprises the management of the Commissioner's cash flows, borrowings and investments, and their associated risks. The Commissioner has borrowed and invested large sums of money and is, therefore, exposed to financial risks, including the effects on revenue from changing interest rates on borrowings and investments, and the risks of a potential loss of invested cash. It is important that the Commissioner successfully identifies, monitors and controls financial risk as part of prudent financial management.
- 2.3 The Commissioner conducts its treasury risk management within the framework of the Chartered Institute of Public Finance and Accountancy's (CIPFA) *Treasury Management in the Public Services Code of Practice 2021 Edition* (the CIPFA Code). The CIPFA Code requires that the Commissioner approves a treasury management strategy before the start of each financial year. In addition, this report fulfils the legal obligation to have regard to the CIPFA Code under the Local Government Act 2003.

2.4 The Annual Investment Strategy (AIS) for 2025/26 meets the requirements of the statutory guidance issued by the Ministry of Housing, Communities and Local Government (MHCLG) in its *Guidance on Local Government Investments 2018 Edition*.

2.5 This strategy has been prepared in conjunction with the Treasury team at Staffordshire County Council (SCC), after consultation with the Staffordshire Commissioner's Office and Police Finance Team.

3. **Summary**

3.1 The Police, Fire and Crime Panel note the proposed borrowing strategy for the 2025/26 financial year. The main features are:

- to continue with the use of cash as far as practical, with the ability to raise long-term loans following consultation with the Director of Finance for the Commissioner;
- a loan restructuring strategy that is potentially unlimited where this rebalances risk; and
- monitor the cash balances and possible need to borrow in the coming years.

3.2 The Police, Fire and Crime Panel in accordance with the MHCLG's Guidance on Local Authority Investments, note the adoption of the Annual Investment Strategy (AIS) 2025/26 as detailed in **Section 7** of this report and summarised in **Appendix 3**. Also, to note the policies on:

- reviewing the Treasury Management Strategy;
- use of external advisers; and
- investment management training.

3.3 All of the above will operate within the prudential limits set out in **Appendix 1** and will be reported to the Director of Finance at the Commissioner and reported retrospectively to the The Police, Fire and Crime Panel, in respect of decisions made for raising new long-term loans, early loan repayments and loan rescheduling.

4. **External Context**

Economic background

4.1 The economic back drop to this report for the first part of 2024/25 saw:

- The Bank of England (BoE) reducing interest rates by 0.5%, from 5.25% to 4.75%;
- Short, medium and long-dated gilts remaining elevated;
- Fluctuating UK Consumer Price Index (CPI) inflation - hitting its 2% target in June, reducing to 1.7% in September and then increasing to 2.5% in December;
- Initial easing in wage growth as the headline 3-month rate fell from 4.6% to 4.3% in September but increasing again in the last quarter of 2024; and
- UK GDP growth slowing in quarter 2 - 0.5% compared with 0.7% in quarter 1 of 2024 and virtually stagnant in quarter 3 – 0.1%. All these measures were slightly weaker than had been expected.

- 4.2 The BoE initiated its loosening cycle in August with a 0.25% rate cut to 5.00%, and continued with this approach at its November meeting, lowering rates a further 0.25% to 4.75%. It is anticipated that UK interest rates will continue to reduce by 0.25% each quarter until September 2025 where they will remain at 4.00% for 2 quarters. Interest rates are then predicted to fall to 3.75% in March 2026 and then to 3.50% in December of the same year, where they are forecast to remain. The low-interest rate environment of the recent past is not expected to return in the coming years.
- 4.3 CPI inflation declined to 1.7% in September, however, this gradually started to increase as a result of many factors, including public sector pay rises. This trend continued, following the minimum wage and employer NI increases announced as part of the 2024 budget, with CPI increasing to 2.5% in December. The Office for Budget Responsibility and the BoE envisage that inflation will remain 'sticky' until at least 2026. Monetary policy is acting to ensure that longer-term, CPI expectations are in line with the 2% target.
- 4.4 GDP growth slowed in quarter 2 of 2024 to 0.50% and reduced further in quarter 3 to 0.1%, reflecting underlying demand momentum. The BoE are now expecting 0% GDP growth in 2024 quarter 4. Whilst the measures announced in the Autumn Budget were expected to boost the level of GDP growth, the BoE have now highlighted significant uncertainty around how the economy may respond to these measures going forwards.
- 4.5 The US President election of Donald Trump paves the way for the introduction/extension of tariffs that could prove inflationary and the same could be said of further tax cuts and an expansion of the current US budget deficit. The direction of US Treasury yields in reaction to President Trump's core policies will impact UK gilt yields. There are also domestic and international factors that could impact PWLB rates accounting for geo-political risks, such as political instability in Europe and Asia and war in the Middle East and Ukraine.

Credit outlook

- 4.6 Credit default swap (CDS) stability is always a concern, as market fluctuations and economic uncertainty can significantly impact the pricing and reliability of these financial instruments. However, CDS prices are constantly monitored by the Commissioner in conjunction with the Treasury team at SCC in respect of this.
- 4.7 Geopolitical and environmental factors can impact on sovereign and bank credit ratings. During the past year several banking institutions credit rating outlooks have improved. Nonetheless, when setting minimum sovereign debt ratings, the Commissioner will not set a minimum rating for the UK.
- 4.8 Looking forward, the potential for bank losses still remains a risk and a cautious approach to bank deposits in 2025/26 is advisable. The Commissioner is exposed to bail-in risk, as the Government will no longer support banks if they fail but rather it will be the investors who primarily bear the financial burden of rescuing the bank.

Interest rate forecast

- 4.9 The BoE has started to initiate its easing cycle by lowering interest rates to 5.0% in August, from 5.25% and a further 0.25% reduction in November to 4.75%. Economists are forecasting that interest rates will continue to reduce by 0.25% each quarter to 4.00% by September 2025 and a continuing gradual reduction to 3.50% by December 2026.
- 4.10 The overall longer-run trend is for gilt yields and PWLB rates to fall back over time, up to December 2026, as inflation reduces.
- 4.11 Due to the ongoing risks outlined above, the treasury strategy retains the low-risk approach adopted in recent years, based on prioritising security, liquidity and then yield.

5. Local Context

- 5.1 On 31 December 2024, the Commissioner held £62.6m of external borrowing and had £36.6m temporarily invested. The Commissioner's future requirements for borrowing and investments can be considered in the context of its balance sheet forecasts described in the following paragraphs.

Balance sheet

- 5.2 In terms of borrowing, the Commissioner discloses its Capital Financing Requirement (CFR) as part of its Statement of Accounts. This represents the underlying need to borrow for capital purposes i.e. the amounts that have been financed through external and internal borrowing rather than being permanently financed.
- 5.3 If the Commissioner increases debt to fund additional capital expenditure, this will increase its Loans CFR; conversely repaying debt through the Minimum Revenue Provision (MRP) will reduce its Loans CFR. The table below shows forecasts for the Commissioner's Loans CFR and how this will be financed through external and internal borrowing.

	31.03.24 Actual £m	31.03.25 Estimate £m	31.03.26 Forecast £m	31.03.27 Forecast £m	31.03.28 Forecast £m
Loans CFR	77.7	89.2	108.3	129.8	137.9
Less external borrowing	(63.1)	(61.5)	(59.7)	(58.1)	(53.8)
Less: Capital financing from revenue/ grants/ receipts	(7.7)	(4.2)	(2.2)	(2.6)	(3.1)
Internal/ borrowing) (Over	6.9	23.5	46.4	69.1	81.0

- 5.4 The table above shows that the Commissioner's Loans CFR is due to significantly increase over the period of the TMSS due to the level of the capital programme which includes a firing range and increased expenditure on the Police estate. This will mean that despite using reserves for some of its capital financing, the Commissioner's internal borrowing requirements will

increase to unsustainable levels, and further external borrowing is likely to be required in future years. A number of existing external loans also mature during the period, which further increase the borrowing requirement.

- 5.5 CIPFA's Prudential Code for Capital Finance in Local Authorities recommends that the Commissioner's total external borrowing should be lower than its highest forecast CFR over the next three years; the previous table shows the Commissioner will comply with this recommendation in 2025/26 and going forward.
- 5.6 For investments, the Commissioner's total resources available are measured by its usable reserves and working capital less any amounts that have been internally borrowed. This is shown in the following table:

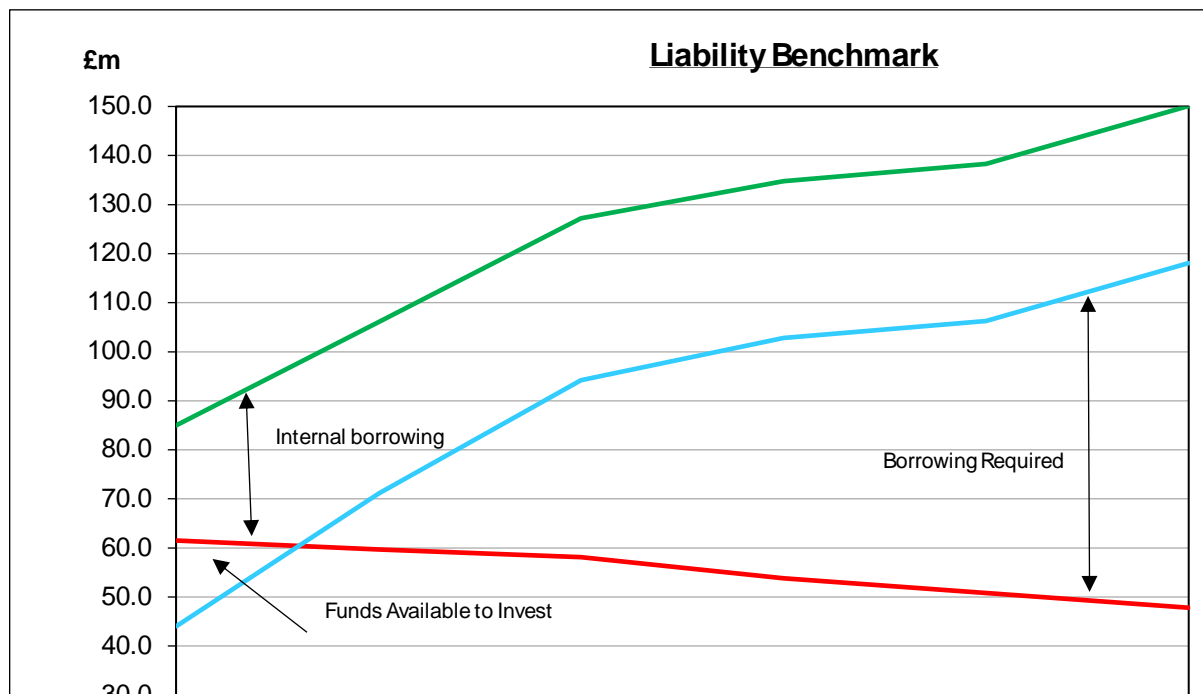
	31.03.24 Actual £m	31.03.25 Estimate £m	31.03.26 Forecast £m	31.03.27 Forecast £m	31.03.28 Forecast £m
Usable reserves	45.5	40.6	35.7	34.1	33.0
Working capital surplus	0.0	0.0	0.0	0.0	0.0
Less internal borrowing	(6.9)	(23.5)	(46.4)	(69.1)	(81.0)
Investment / (New borrowing)	38.6	17.1	(10.7)	(35.0)	(48.0)

- 5.7 This demonstrates the Commissioner's recent strategy in using internal borrowing to reduce the need for external borrowing and as a result, reduce temporary investment levels. However, this strategy will not be sustainable longer term, as the table indicates that the Commissioner will not have sufficient internal resources to cover the internal borrowing requirement going forward and therefore will need to borrow from external sources. Depending on the actual reserve levels, capital programme expenditure and cashflow, the Commissioner may need to borrow from external sources during 2025/26.

Liability benchmark

- 5.8 The CIPFA Prudential Code requires local authorities to develop their own liability benchmark to manage treasury management risk. The liability benchmark represents the minimum amount of loans required to maintain cash balances at nil i.e. when all usable reserves and working capital surpluses are used to offset the amount of loans borrowed.

	31.03.24 Actual £m	31.03.25 Estimate £m	31.03.26 Forecast £m	31.03.27 Forecast £m	31.03.28 Forecast £m
External Loans	63.1	61.5	59.7	58.1	53.8
(Less investments) / add new borrowing	(38.6)	(17.1)	10.7	35.0	48.0
Liability benchmark	24.5	44.4	70.4	93.1	101.8



5.9 The chart shows that the Commissioner's CFR (green line) has been financed through a combination of external borrowing (red line) and internal borrowing (the difference between the red line and the green line). The data points on the chart represent the end of the financial year.

5.10 The chart indicates that during 2025/26, the Commissioner's level of external loans may fall below the minimum required by the liability benchmark and this gap continues to widen over the period. This is due to the Commissioner's CFR, and hence its liability benchmark, increasing for the next few years, driven by its capital investment. At the same time, the Commissioners level of external loans fall during this period as several loans are repaid upon maturity.

5.11 Given these forecasts, the Commissioner may need to borrow externally in 2025/26 as it may not have sufficient usable reserves and working capital to cover the amounts required internally and may also have to borrow in the coming financial years. Therefore, the liability benchmark has an impact on the Commissioner's borrowing strategy for 2025/26 and beyond.

6 **Borrowing strategy 2025/26**

6.1 As at 31 December 2024 the Commissioner held £62.6m in external loans. There is a redemption of £1.1m to be paid by 20 February 2025 leaving a balance of £61.5m at the beginning of 2025/26, which is funding previous years capital programmes. The Commissioner will need to ensure total amounts borrowed do not exceed the authorised limit of £131.4m, as disclosed in **Appendix 1**.

Objectives

6.2 The primary objective for the Commissioner when considering the need to borrow money is to strike an appropriate balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required.

Strategy

- 6.3 Given the ongoing financial pressures on public services and local government funding, the Commissioner continues to address the key issue of affordability without compromising the long-term stability of its debt portfolio. As short-term interest rates have been lower than long term interest rates for a long period of time, it has been more cost effective for the Commissioner to use its internal cash resources in lieu of borrowing in the short term.
- 6.4 The current economic environment continues to favour using cash in lieu of borrowing, where balances are sufficient as:
- Short, medium and long-dated gilts remain elevated and the margin the PWLB add on to onward lend to local authorities means it is cheaper to use cash than to borrow;
 - Due to bail-in legislation it is important to minimise investment risk, as using cash in lieu of borrowing reduces investment balances;
 - Using cash in lieu of borrowing within practical cash management limits would meet key parts of the current government guidance on local government investments, i.e. managing the security and liquidity risks for investments; and
 - Continuing to use cash in lieu of borrowing would meet the objective of bringing down the average rate of interest for borrowing and provide an opportunity to fund the capital programme at low cost.
- 6.5 In the past, cash balances have been sufficient to allow the strategy of using cash without the need to raise further external loans. The balance sheet analysis at **paragraph 5.6** and the liability benchmark analysis at **paragraph 5.8** both indicate the Commissioners cash balances will be lower in the coming years and consideration will need to be given to borrowing externally.
- 6.6 The Commissioner will monitor the benefits of internal borrowing on a regular basis. This strategy must be balanced against the possibility that long-term borrowing costs may increase in future years, leading to additional costs as a result of deferring borrowing. The Commissioner will need to determine whether it borrows additional sums, at long term fixed rates in 2025/26, with a view to minimising future interest costs. The Commissioner will consult with the Treasury team at SCC in respect of this.
- 6.7 The proposed borrowing strategy is one that aims to balance the liquidity needs of day-to-day cash management with the low-risk approach that is maintained by using cash in lieu of borrowing.

Sources of borrowing

- 6.8 The approved sources of long term and short-term borrowing are:
- The Public Works Loans Board (PWLB);
 - UK Municipal Bonds Agency Plc and any other special purpose companies created to enable local authority bond issues;
 - Other UK public sector bodies;
 - UK public pension funds;
 - Approved banks or building societies authorised to operate in the UK; and
 - Any institutions approved for investments.

Short-term loans

- 6.9 Short-term loans raised from money markets are typically under 12 months duration. These can be lower cost, and the Commissioner can respond flexibly to liquidity pressures by raising these when needed. The disadvantage of short-term loans is one of availability and it can be difficult to raise them quickly from banks and building societies.
- 6.10 The local authority lending market has progressed considerably in recent years and loans are generally available in the short to medium term. However, future availability cannot be predicted as loans raised depend upon other local authorities having available cash balances and being prepared to lend them to the Commissioner.

Long-term loans

- 6.11 Long-term loans are those for a duration of more than 12 months. The Commissioner has previously raised most of its long-term borrowing from the PWLB, a statutory body that issues loans to local authorities. Government consent is not ordinarily required, hence the PWLB continues to be the 'lender of first resort' because of the flexibility and ease of access. However, local authorities are required by law to have regard to the Prudential Code and only borrow within relevant legislation and their borrowing powers.
- 6.12 HM Treasury have also put measures in place to prevent public bodies using PWLB funding to finance any commercial investments and there are mechanisms in place to recall such funding if this is found to be the case. In addition, the latest Prudential Code explicitly prevents Local Authorities borrowing to fund commercial ventures.
- 6.13 Where the Commissioner has a long-term borrowing need, it can consider the alternative sources of borrowing other than the PWLB highlighted in **paragraph 6.8**. Seeking lower interest costs may introduce greater administrative and resource costs as well as increased risk, and this would need to be balanced against the ease of access to loans from the PWLB.
- 6.14 The exact type of loan to be raised by the Commissioner and its duration would have to be considered at the time; but with current interest rates and the maturity profile of the existing loan portfolio, loans towards the shorter end of the yield curve offer better value for money.
- 6.15 The optimum timing for borrowing cannot be foreseen and decisions often need to be taken at short notice, therefore, it is proposed to delegate the decision to borrow long-term loans to the Director of Finance at the Commissioner and report retrospectively to The Police, Fire and Crime Panel. In addition, the treasury management outturn and half-year reports will update the position later in the year.
- 6.16 The overall strategy of maximising the use of cash in lieu of borrowing is still considered a relatively low risk strategy, although it is impossible to eliminate all treasury risk. The consequences of using cash are the possibility of increased costs in the future if interest rates rise further; this must be balanced with the extra cost now if loans are raised (the cost of carry).

Loan restructuring

- 6.17 Movements in interest rates over time may provide opportunities to restructure the loan portfolio in one of two ways:
- Replace existing loans with new loans at a lower rate (known as loan rescheduling); and
 - Repay loans early, without replacing the loans, although this would increase the use of cash which may not be possible given the levels of reserves available.
- 6.18 Market conditions have changed in the last 12 months and gilt yields have risen from the historic lows seen over the last 10 years. This rise in gilt yields means that there is a possibility that PWLB premiums may be low and could be offset by interest savings on extinguished loans, in addition discounts may be offered on some loans. The Commissioner, in conjunction with the County Council's Treasury team, will continue to monitor the market and identify possible savings arising during 2025/26.
- 6.19 The Commissioner's ability to adjust its loan portfolio through restructuring is only possible if:
- the Government allow it; PWLB rules have been changed in the past with no notice; or
 - market conditions allow economically beneficial repayment.
- 6.20 Market conditions and regulations are not constant and do change and loan restructuring can only be carried out when conditions are favourable. The decision as to when to undertake loan restructuring will be delegated to the Director of Finance for the Commissioner and reported retrospectively to the The Police, Fire and Crime Panel.

7. Annual Investment Strategy (AIS) 2025/26

- 7.1 It is the Commissioner's Borrowing Strategy that determines its Investment Strategy. In the current economic environment, where short term investment rates are at par or lower than borrowing rates, this still favours the use of cash instead of external borrowing, hence balances available for temporary investments are likely to be less.
- 7.2 The Commissioner may have significant levels of funds to invest at different points of the year; this usually represents income received in advance of expenditure plus balances and reserves held. In the previous year, the Commissioner's investment balance ranged between £17.8m and £83.0m.

MiFID II

- 7.3 Following the introduction of the second Markets in Financial Instruments Directive (MiFID II) regulations from January 2018, local authorities will automatically be treated as retail clients by financial services firms, unless they meet the criteria and 'opt up' to be professional clients. As a retail client, the Commissioner would receive enhanced protections, but this would also mean they may face increased costs and restricted access to certain products including money market funds, pooled funds, treasury bills and treasury advice.

- 7.4 The commissioner meets the criteria set out under MiFID II and having chosen to 'opt-up', will continue to be treated as a professional client by regulated financial services firms in 2025/26.

Objectives

- 7.5 The CIPFA Code requires local authorities to invest their cash prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return or yield.
- 7.6 The Commissioner's objective when investing its cash is to strike an appropriate balance between risk and return, thereby minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

Strategy

- 7.7 The main characteristics which should determine an investment strategy are:
- the credit risk of the counterparties invested with;
 - the length of the investment; and
 - the type of financial instrument that is used.
- 7.8 The Commissioner has taken a low-risk approach to investment and the AIS for 2025/26 will continue to do so. The Commissioner will continue to concentrate its short-term investments in secure money market funds and government investments, together with a low-risk pooled fund in 2025/26.
- 7.9 MHCLG Guidance on Local Government Investments specifies the types of financial instruments that local authorities can invest in, and the Commissioner has divided its approved treasury investments into Standard Investments and Non-Standard Investments.

Standard investments

- 7.10 The Commissioner considers Standard Investments to be those made with approved counterparties that do not require further approval from the Director of Finance and the Commissioner. These investments tend to be for a period of less than a year and are those most frequently used by the Commissioner. Standard Investments can be invested with:
- UK Government – central government or local authority, parish council or community council;
 - short term money market funds (MMFs); and
 - bank and building society investments.

i) UK Government

- 7.11 The Commissioner invests with central government by using its Debt Management Account Deposit Facility (DMADF) account. Funds held in the DMADF account are backed by the UK Government, so they are very secure; however, returns may be lower than those received from elsewhere.

7.12 The Commissioner can invest in term deposits with local authorities which can provide a higher return depending on the availability of, or the need for cash, in the local authority lending market. Like central government investments, local government investments are not subject to bail in risk. However, the market has reduced since the pandemic due to a lack of local authority borrowers.

7.13 Although investments in the local authority lending market have a low risk of insolvency, they are not completely without risk. The financial risks of some local authorities have been well documented in the press; the Commissioner will continue to monitor such developments and seek information from the Treasury team at SCC where necessary.

ii) Money Market Funds (MMFs)

7.14 Money Market Funds have high credit quality and are pooled investment vehicles consisting of money market deposits and similar instruments. Short-term MMFs that offer same day liquidity can be used as an alternative to instant access bank accounts. Same day notice MMFs have been used by the Commissioner for some time as they have tended to provide greater security and a higher yield than bank accounts.

7.15 EU regulation, introduced in January 2019, meant most same day notice MMFs have converted from a Constant Net Asset Value (CNAV) to a Low Volatility Net Asset Value (LVNAV) structure. The assets of LVNAV MMFs are marked to market, meaning the dealing NAV (unit price) may fluctuate. However, LVNAV MMFs are allowed to maintain a constant dealing NAV provided they meet strict criteria and minimum liquidity requirements. Public debt CNAV MMFs are still available where 99.5% of assets are invested in government debt instruments.

7.16 MMFs are a key tool to manage credit and liquidity risk and the Commissioner will continue to use same day notice MMFs that meet the criteria listed below. These are considered to have sufficient high credit quality to be included on the Commissioner's Approved Lending List:

- Diversified – MMFs invest across many different investments meaning they achieve more diversification than the Commissioner could achieve on its own account;
- Short liquidity – cash can be accessed daily;
- Ring-fenced assets – the investments are owned by investors and not the fund management company; and
- Custodian – the investments are managed by an independent bank known as a custodian, who operates at arms-length from the fund management company.

7.17 Like all treasury instruments, MMFs do carry an element of risk. The failure of one or more of an MMF's investments could lead to a run on MMFs, especially during a financial crisis, although the MMF regulations introduced in recent years do limit this risk to some extent.

iii) Bank and building society accounts

7.18 The Commissioner can make investments with banks and building societies that meet the minimum threshold (**see paragraph 7.31**) by using call accounts

or term deposits, but these investments will run the risk of credit loss via a bail in, if the regulator determines that the bank is failing or likely to fail. Due to this issue and a general cautious approach to bank and building society investments, currently the only bank or building society in use by the Commissioner is its banking provider, Lloyds Bank (see section below). Use of any further banks or building societies is delegated to the Director of Finance for the Commissioner with the outcome reported in the regular treasury management reports to the Strategic Governance Board (Police).

iv) Operational bank account

- 7.19 The Commissioner's banking provider is Lloyds Bank. Cash is retained with Lloyds Bank each night earning interest at below market rate; the amount retained will be set in line with the diversification policy set out at **paragraph 7.22** onwards.
- 7.20 In respect of the Bank ring-fencing legislation Lloyds Bank has a relatively small investment banking operation meaning that 97% of the bank's assets remain within the 'retail bank' ring-fence. The Commissioner's business with Lloyds Bank will take place within the 'retail bank' ring-fence (Lloyds Bank Plc) and not form part of their investment banking operations (Lloyds Bank Corporate Markets).
- 7.21 Should the Lloyds credit rating fall below the Commissioner's minimum threshold, then minimum balances will be retained with the bank for operational efficiency. The Commissioner will continue to seek support from the County Council's Treasury team on bank credit risk and any changes will be determined by the Director of Finance at the Commissioner.

Standard Investment diversification

- 7.22 Risks to investments, such as those discussed for MMFs in **paragraph 7.17**, point towards the fundamental need for diversification across counterparties and investment categories, where possible. Diversification can help to protect the security of investments by limiting the Commissioner's loss in the event of a counterparty default. Diversification will not protect the Commissioner from a systemic failure of the banking sector even if the risk of this has diminished following the bail-in banking regulations.
- 7.23 Diversification can be achieved by setting a maximum amount to be invested with each counterparty to limit risk and to ensure a spread of investments:
- No limits are proposed for government investments as these may be utilised for all the Commissioner's investments in certain circumstances;
 - For MMF's a standard limit of £5m per MMF is in place to meet liquidity requirements; and
 - For Lloyds Bank a limit is set of the lower of 10% of total balances or £1.0m (subject to a minimum upper level of £500k). This amount will minimise processing costs and provide additional liquidity for the Commissioner. The Treasury team at SCC will review and reset this limit once a month.
- 7.24 In the last few financial years, the Commissioner has held additional balances throughout the year leading to higher cash balances. To allow flexibility for investments, the Director of Finance for the Commissioner agreed to increase

the standard limits to temporary limits of £7.5m for MMFs. The Commissioner will continue to use the higher temporary limits in 2025/26 until the level of cash balances fall sufficiently to allow reverting to using the standard limits.

- 7.25 Where cash balances are low then this may mean that all investments are placed with the MMFs and Lloyds Bank. However, balances will be within the limits stated above.
- 7.26 The application and amendment of this policy are delegated to the Director of Finance at the Commissioner with the outcome reported in the regular treasury management reports to the Strategic Governance Board (Police).

Non-Standard Investments

- 7.27 The Commissioner considers Non-Standard Investments to be all other types of approved investment counterparties that are not included as part of Standard Investments i.e. those investments that are used less frequently and may require further approval from the Director of Finance at the Commissioner.
- 7.28 Collective Investment Schemes are Non-Standard Investments that range from enhanced MMF's to property and equity funds. These all have varying risk and return profiles. The Commissioner began to use this category of investment in 2022/23 by investing £5m into the Royal London Fund, a AAA rated enhanced Cash Plus MMF with a 3-day liquidity notice period.
- 7.29 The financial limit for the Royal London Cash Plus MMF had been set at £1.5m but was temporarily increased to £5m due to the increased levels of cash balances, following approval by the Director of Finance at the Commissioner in January 2023. The Commissioner will continue to use the higher temporary limit in 2025/26 until the level of cash balances fall sufficiently to allow reverting to using the standard limit.

Credit Management Strategy for 2025/26

- 7.30 Investments made by the Commissioner should be of 'high credit quality'. Although this can be difficult to define, credit ratings can be used as published by external credit rating agencies (the three main agencies are Moody's, Standard and Poor and Fitch). Credit ratings can be obtained from the County Council's Treasury team, where available.
- 7.31 For 2025/26, the minimum credit-rating thresholds are set at a long-term rating of A- where available. Counterparties that are rated below this level are excluded. However, credit ratings are not the only aspect of how creditworthiness is assessed.
- 7.32 The following elements are also factored in when evaluating creditworthiness:
- "Watches" and "outlooks" from credit rating agencies;
 - Potential government support;
 - Credit Default Swap (CDS) prices, i.e. the cost of insuring against counterparty default;
 - Share prices and bond yields;
 - Balance sheet structure;
 - Macro-economic factors; and

- A subjective overlay, i.e. a judgement being made about whether the counterparty should be recommended or not.

7.33 The Commissioner remains responsible for all its investment decisions. The Treasury team at SCC will continue to have treasury management meetings with the Commissioner on a quarterly basis where a review of the Lending List will take place.

7.34 Under stressed market conditions, additional meetings with the Treasury team at SCC may take place at very short notice. A decision may be made to adjust the Commissioner's investment risk profile. This may result in moving investments to lower risk counterparties or instruments.

Non-treasury investments

7.35 Under the CIPFA Code and MHCLG Guidance, local authorities may invest in other financial assets and property for financial return, and also make loans and investments for service purposes.

7.36 Such non-treasury investments should be assessed as part of a separate commercial investment strategy. They should set out the specific policies and arrangements for non-treasury investments and ensure the same robust procedures for the consideration of risk and return are applied to these, as for treasury investments.

7.37 In the absence of any legal powers to do so the Commissioner does not currently hold any non-treasury investments and, therefore, no additional commercial investment strategy is required.

Risk

7.38 Although guidance sets out security and liquidity as being the main treasury risks, they are not the only investment risks faced by the Commissioner. **Appendix 4** sets out a high-level risk assessment for six of the key risks which are summarised in the following table:

Risk	Assessment
Security	Low
Liquidity	Low to Medium
Interest rate	Low to Medium
Market	Low
Refinancing	Low to Medium
Regulatory and legal	Low

7.39 Within the Commissioner's AIS there is a balance to be made between the security of investments and liquidity; the safest investments are not necessarily the most liquid and so a pragmatic approach must be taken.

7.40 The proposed AIS has been evaluated against these risks and the most significant risks have been reduced as far as possible. This is not to say that all risk has been eliminated as this is not possible in treasury terms.

8. **Review of strategy**

8.1 The Commissioner will prepare a revised strategy when there are significant changes to the following factors:

- the economic environment;
- the financial risk environment;
- the budgetary position; or
- the regulatory environment.

8.2 The responsibility for assessing these circumstances and proposing changes to the strategy is allocated to the Director of Finance at the Commissioner.

9. **Policy on the use of external service providers**

9.1 Currently the Commissioner has no contracted external treasury adviser, and this is considered appropriate with the simple arrangements set out.

10. **Investment management training**

10.1 Treasury management is a specialised area requiring high quality and well-trained staff that have an up-to-date knowledge of current issues, legislation and treasury risk management techniques.

10.2 SCC's Treasury team who provide the treasury service are senior qualified finance professionals. Treasury practitioners also attend regular CIPFA and treasury adviser training seminars throughout the year and have any training needs identified during the Council's staff review process. The function is also subject to regular audit and independent checks.

10.3 Training needs for Commissioner staff who attend quarterly meetings with SCC's Treasury team are assessed on an ongoing basis by local managers.

11. **SCC Memorandum of Understanding**

11.1 SCC provides treasury management and banking services as part of a Service Level Agreement with the Commissioner. The SLA does not constitute a formal contract but is a document of good practice; it outlines the range of services provided by SCC, and the degree of co-operation required from the Commissioner for SCC to fulfil its role.

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Background Documents

1. Treasury Management in the Public Services: Code of Practice (CIPFA) (2021)
2. Prudential Code for Capital Finance in Local Authorities (CIPFA) (2021)
3. The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003
4. Statutory Guidance on Local Government Investments – Issued under Section 15(1) (a) of the Local Government Act 2003 (2018)
5. Statutory Guidance on Minimum Revenue Provision – Issued under section 21 (1A) of the Local Government Act 2003 (2018)
6. Localism Act 2011 – Guidance on the General Power of Competence in sections 1 to 6.

The Police, Fire and Crime Panel
3rd February 2025/26
Treasury Management Indicators

Indicator	Estimate 2025/26	Estimate 2026/27	Estimate 2027/28
1. External debt			
Authorised limit	£121.0m	£142.3m	£149.7m
Authorised Limit for other liabilities	£10.4m	£9.9m	£9.4m
TOTAL	£131.4m	£152.2m	£159.1m
Operational boundary	£109.8m	£125.6m	£131.7m
Operational Boundary for other liabilities	£10.4m	£9.9m	£9.4m
TOTAL	£120.2m	£135.5m	£141.1m
External Loans	£88.5m	£105.1m	£118.1m
Other long-term liabilities	£10.4m	£9.9m	£9.4m
TOTAL	£98.9m	£115.0m	£127.5m
<i>The authorised limit is the maximum level of external borrowing which should not be exceeded. It is linked to the estimated level of borrowing assumed in the capital programme.</i>			
<i>The operational boundary represents the Director of Finance's estimate of the day-to-day limit for treasury management activity based on the most likely i.e. prudent but not worst-case scenario.</i>			
2. Interest rate exposures			
a. Upper limit (fixed)	£106m	£127m	£135m
b. Upper limit (variable)	(£90m)	(£90m)	(£90m)
<i>Upper limits of fixed and variable borrowing and investments are required to be set. This limits exposure to both fixed and variable interest rate movements as part of the overall risk management strategy for treasury management activities. Negative figures are shown in brackets; these relate to investments at a variable rate which are not offset by variable borrowings.</i>			
3. Maturity structure of borrowing	Upper Limit	Lower Limit	Loan Maturity
Under 12 months	10%	0%	3.0%
12 months and within 24 months	10%	0%	2.6%
24 months and within 5 years	30%	0%	16.7%
5 years and within 10 years	50%	0%	11.9%
10 years and above	100%	25%	65.8%
<i>This indicator identifies the amount of loans maturing in specified periods. The overarching principle is that steps should be taken from a risk management point of view to limit exposure to significant refinancing risk in any short period of time.</i>			
<i>As a result no more than 10% of fixed rate loans are planned to mature in any one financial year.</i>			
4. Total principal sums invested for periods longer than a year	£	£	£
<i>Any investments made for longer than a year will be in accordance with the limits on non-specified investments.</i>	nil	nil	nil

Appendix 2
The Police, Fire and Crime Panel
Risk assessment – Borrowing strategy

Risk	Risk description	Relevance to borrowing	Key control	Assessment	Borrowing strategy
Security	A third party fails to meet its contractual obligations (i.e. counter party risk).	Unlikely there would be a failure between the agreement to borrow and sums being received. Exposure to investment risk if borrow in advance and invested until needed.	Usually borrow from the Government (PWLB or its successor body) with 2-day gap between agreement to borrow and receipt of money.	LOW	Use of cash to fund debt reduces this risk. There is insufficient cash to fully fund debt so it is likely that borrowing will be required.
Liquidity	Cash is not readily available when it is needed.	Usually borrow for capital from Government (PWLB or its successor body). Can also borrow for the short-term e.g. from other local authorities.	Prudential rules on borrowing and consideration of whether Government is secure.	LOW MEDIUM to	Use of cash to fund debt increases this risk as liquidity is reduced when borrowing is avoided. Any increase in borrowing decreases this risk.
Interest rate	Unexpected <u>reduction</u> in short term interest rates.	Depends on the mix between fixed and variable rate borrowing. Higher exposure to variable rate borrowing helps the budget.	The control is set out below.	LOW MEDIUM to	Pursuing a strategy of using cash reduces the overall net exposure to sudden interest rate falls.
Interest rate	Unexpected <u>increase</u> in short term interest rates.	Depends on the mix between fixed and variable rate borrowing. Lower exposure to variable rate borrowing helps the budget.	Limit variable rate borrowing to a relatively small proportion (e.g. 20%).	LOW MEDIUM to	20% limit provides a suitable risk control.

Appendix 2 (continued)

Risk	Risk description	Relevance to borrowing	Key control	Assessment	Borrowing strategy
Market	The market value of loans change substantially (i.e. how much is the borrowing strategy exposed to long term interest rate change).	How much risk is built into the maturity profile of the loans structure.	This is inversely linked to refinancing risk below.	MEDIUM	Use of cash will shorten the duration of the loan portfolio and reduces this risk. Without the use of cash this risk assessment would probably be high.
Refinancing risk	Maturing transactions cannot be renewed on similar terms.	To avoid a high level of borrowing over a short period with exposure to high interest rates.	The Commissioner has a policy of limiting maturing loans to 10% of the loans portfolio.	MEDIUM	Using cash to fund debt potentially increases the refinancing risk. Without the use of cash this risk assessment would probably be low.
Regulatory and legal risk	Rules governing local government borrowing are changed or amended without notice, which has happened in the past.	Local government heavily reliant upon PWLB or its successor body. Cost and ability to reschedule / manage loans are determined by the Government. The Government could close the PWLB or its successor body and force local authorities to use market loans for all new borrowing.	Market loans will be evaluated and will be taken if they are good overall value.	MEDIUM	Use of cash means that PWLB (or its successor body) loans may not be taken. However, there is insufficient cash to fully fund debt in the medium term so it is likely that borrowing will be required. If the PWLB or its successor body was closed to new business, then other loans would have to be taken.

**The Police, Fire and Crime Panel
Lending List – January 2025**

Investment	Time Limit
<i>Regulation Investments</i> UK Government DMADF account UK Local Authority	6 months 12 months
<i>Banks and Building Societies</i> Lloyds (as banker) (£1.0m limit)	overnight
<i>MMF's</i> Aberdeen Standard (£7.5m limit) CCLA (£7.5m limit) Morgan Stanley (£7.5m limit) SSGA/ State Street (£7.5m limit)	call only call only call only call only
<i>Enhanced MMF</i> Royal London Cash Plus (£5.0m limit)	3-day notice

Appendix 4
The Police, Fire and Crime Panel
Risk assessment - Investments

Risk	Risk description	Relevance to investment	Key control	Assessment	Approved Investment Strategy (AIS)
Security	A third party fails to meet its contractual obligations (i.e. counter party risk).	Crucial that money invested is returned (principal and interest).	Relies on credit management policy including: credit risk; duration of investment and amount; as well as an ongoing review of the credit environment. Prudential limit on investment over 1 year.	LOW	Use of the investments identified within the AIS reduces this risk to a low level. The borrowing strategy identified will reduce cash balances and the resulting security risk. With the exception of regulation investments, counterparties also have a financial limit to ensure funds are spread amongst them. Overall, this remains a low-risk strategy.
Liquidity	Cash is not readily available when it is needed.	Need to plan investment to match cash requirements.	Managed through detailed cash flow forecast and investments in highly liquid funds.	LOW to MEDIUM	Same day access accounts are held with four MMFs. Balances are held with Lloyds Bank Plc overnight on account. Cash flow plans are completed annually and regularly updated.
Interest rate	Unexpected <u>reduction</u> in Interest rate.	Reduces the return on investment and reduces the level of reserves.	Can reduce risk by; A) netting off investment against borrowing to reduce net exposure B) investing for longer periods.	LOW	Investments will be mainly short term – this does not protect against an interest rate reduction.

Appendix 4 (continued)

Risk	Risk description	Relevance to investment	Key control	Assessment	Approved Investment Strategy (AIS)
Interest rate	Unexpected <u>increase</u> in interest rates.	To take advantage of the unexpected return, would need to keep investment short term and increase the amount of cash invested (e.g. by not using cash in lieu of borrowing).	Controlled through the overall strategy.	MEDIUM	Current policy allows upturns to be taken advantage of as investments are not fixed for long periods. Using cash to fund debt (the proposed borrowing strategy) reduces this risk as the overall exposure to short term interest rates is less.
Market	Unexpected need to liquidate market instrument quickly and accept 'price on the day'.	Only relevant if invest in market instruments (e.g. CD's, gilts).	Limit investment in market instruments or alternatively have capacity to borrow to avoid need to liquidate. Controlled by limits on non-specified investments.	LOW	Market instruments are not in use.
Refinancing risk	Maturing transactions cannot be renewed on similar terms.	Reflected in the term (duration) of investments. Shorter term investments have a higher refinancing risk.	Proportion of investments maturing in the short term.	LOW to MEDIUM	The current policy is to invest in the short term. There is an increased risk with this strategy due to frequent 'refinancing'. This is advantageous in a higher rate environment. Using cash to fund debt (the proposed borrowing strategy) reduces this risk as the overall exposure to short term interest rates is less.

Appendix 4 (continued)

Risk	Risk description	Relevance to investment	Key control	Assessment	Approved Investment Strategy (AIS)
Regulatory and legal risk	Rules governing local government investment powers are changed or amended without notice.	Investment powers are granted through statute and guidance.	None.	LOW	The current policy of using cash in lieu of borrowing reduces the authority's dependency on interest receipts. The AIS is low risk and uses liquid and conservative investment instruments.