

WILTSHIRE COUNCIL

WILTSHIRE PENSION FUND COMMITTEE
10 March 2016

TREASURY MANAGEMENT STRATEGY

Purpose of the Report

1. The purpose of this report is to seek Members' approval for the Annual Treasury Management Strategy prepared for the Wiltshire Pension Fund.

Background

2. As the Committee is aware, the Fund has its own bank account, entirely separate from Wiltshire Council's bank accounts. This was implemented in April 2009, at the same time as the Fund gained its own accounting entity with the introduction of the SAP system. Separate bank accounts became a requirement of the Local Government Pension Scheme Regulations from 1 April 2011.
3. Following concerns about so-called "co-mingling" of local authority and pension fund cash balances, and the associated risk of cross-subsidy; the same Regulations require that the two sets of cash investments are managed separately. This separation has been in place since 2010/11.

Considerations for the Committee

4. The Fund currently has a neutral cashflow position from its dealings with members, so in any month, the income from contributions and transfers-in approximately equals the pensions, transfers-out and costs paid out. Any surplus cash accumulated (Trowbridge Cash) is sent to one of the Fund's investment managers on a monthly basis, although a float of approximately one month's cash requirement (£3 - £4 million) is held for cashflow purposes. This is necessary to avoid the Fund having to borrow short-term within the month.
5. This Treasury Management Strategy for Wiltshire Pension Fund has been updated to reflect the need for compliance with the Local Government Pension Scheme (Management and Investment of Funds) Regulation 2016 upon coming into force.
6. Officers continue to monitor the numbers of transfers out resulting from the new freedoms in accessing Defined Contributions pension savings which commenced in April 2015.
7. When preparing this strategy officers liaise with Wiltshire Council's Treasury Management Team to ensure the strategy is appropriate. There has been one change proposed to the Wiltshire Council Treasury Strategy for 2016-17, removing one of the minimum requirement criteria for high credit quality relating to support ratings (see paragraph 28 in attached annex).
8. If there are any changes made to the Wiltshire Council Treasury Strategy during the year the Wiltshire Pension Fund Strategy will be amended accordingly. This would be following a change in the minimum requirements for high credit quality.

The Key points of the Treasury Management Strategy

9. The key points of the Strategy (see attached) are:
- a) The Fund will aim to achieve the optimum return on investments commensurate with high levels of security and liquidity.
 - b) The monies will be invested separately from the Council's and the Fund will receive the actual interest earned.
 - c) The Pension Fund will use the same criteria for maximum limits and terms with individual counterparties as approved by Wiltshire Council on an annual basis in its own Treasury Management Strategy, subject to:
 - i. A maximum of £6 million with any single counterparty;
 - ii. No investment will be made in the money market funds / cash vehicles used by the Custodian to invest any cash it holds on behalf of the Fund's investment managers.
 - d) Given the nature of Trowbridge Cash (ie. short-term working capital nature), the investments will only be made either in:
 - i. Call Accounts provided by an approved deposit-taker that complies with the Counterparty Policy set out in the Strategy; or
 - ii. Money Market Funds managed by an approved investment manager.
 - e) The providers of the Call Accounts, and the Money Market Fund vehicles, must have a "high credit rating" as prescribed in the minimum requirements for "high credit rating" set out in Wiltshire Council's annual Treasury Management Strategy.
 - f) The Fund will not borrow except by way of temporary loan or overdraft from a bank or otherwise, and then only in exceptional circumstances where it is for the purpose of:
 - i. Paying benefits due under the Scheme; or
 - ii. Meeting investment commitments arising from the implementation of a decision by the Committee to change the balance between the different types of investment.
 - g) The management of Wiltshire Pension Fund's cash will be carried out by Wiltshire Council's Treasury Management team under a Service Level Agreement.

Environmental Impact of the Proposal

10. There is no known environmental impact of this proposal.

Financial Considerations & Risk Assessment

11. This has been dealt with in this paper. The implementation of this Treasury Management Strategy mitigates the risk PEN016: Treasury Management outlined on the Wiltshire Pension Fund risk register.

Legal Implications

12. There are no known implications at this time.

Safeguarding Considerations/Public Health Implications/Equalities Impact

13. There are no known implications at this time.

Reasons for Proposals

14. It is best practice, as well as being desirable operationally, to have a separate Treasury Management Strategy for the Wiltshire Pension Fund, so that there is no question of cross-subsidy or co-mingling.

Proposals

15. The Committee is asked to approve the attached Treasury Management Strategy.

MICHAEL HUDSON
Treasurer to the Pension Fund

Report Author: Catherine Dix, Strategic Pensions Manager

Unpublished documents relied upon in the production of this report: NONE

WILTSHIRE PENSION FUND TREASURY MANAGEMENT STRATEGY

Operational Context

1. The Fund currently has a neutral cashflow position from its dealings with its members, so in any month, the income from contributions and transfers-ins approximately equals the pensions, transfers-out and costs paid out.
2. Any surplus cash accumulated (“Trowbridge Cash”) is allocated to one (or more) of the Fund’s investment managers on a monthly basis. It is sent to the Fund’s custodian BNY Mellon, who invest the cash held on behalf of each investment manager in Money Market Funds, under the terms of the Custody Agreement. These investments are not within the scope of this Strategy.
3. However, approximately one month’s cash requirement (£3 - £4 million) is held back as a float for cashflow purposes. This is necessary to avoid the Fund having to borrow from Wiltshire Council or elsewhere for short-term cashflow purposes within the month.

Regulatory Context

4. The Fund will comply with the requirements of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 until they are revoked, which were implemented on 1 January 2010. Upon the revocation of the 2009 regulations The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 will be complied with. From 1 April 2010 Wiltshire Pension Fund has not pooled pension fund cash with Wiltshire Council’s own cash balances for investment purposes.
5. The Fund will also have regard to:
 - a) The Department for Communities and Local Government’s (DCLG’s) Guidance on Local Government Investments (“the Guidance”) issued in March 2004 and any revisions to that Guidance;
 - b) The Audit Commission’s report on Icelandic investments;
 - c) The 2011 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes (“the CIPFA TM Code”);
 - d) The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 or 2016 (once in force).

Investment Policy

6. The general investment policy of the Fund is the prudent investment of any surplus cash balances, the priorities of which are:
 - a) The security of capital; and
 - b) The liquidity of investments.

7. The Fund will also aim to achieve the optimum return on investments commensurate with high levels of security and liquidity.
8. All cash investments will be in sterling.
9. The monies will be invested separately from the Council's and the Fund will receive the actual interest earned. Monies will be paid out of and received back into the Pension Fund bank account.
10. Trowbridge Cash will target a range of £3 - £7 million, with the highest balances held between the 19th of the month (ie. when all contributions have to be paid over by employers) and 25th of the month (pensions payroll). The float held in-month for cashflow purposes will target £3 - £4 million. For the avoidance of doubt, these are indicative amounts, not absolute limits.
11. The Pension Fund will use the same criteria for maximum limits and terms with individual counterparties as approved by Wiltshire Council on an annual basis in its own Treasury Management Strategy, subject to:
 - a) A maximum of £6 million with any single counterparty.
 - b) No investment will be made in the same money market funds / cash vehicles used by the Custodian to invest any cash it holds on behalf of the Fund's investment managers.
 - c) For the avoidance of doubt, the Pension Fund's limits are in addition to Wiltshire Council's own limit in any single counterparty.
12. Given the nature of Trowbridge Cash (ie. short-term working capital nature), the investments will only be made either in:
 - a) Call Accounts provided by an approved deposit-taker that complies with the Counterparty Policy set out below; or
 - b) Money Market Funds managed by an approved investment manager.
13. For the avoidance of doubt, direct investments with counterparties are not permitted (eg. direct deals with banks or other local authorities for fixed time periods).
14. The providers of the Call Accounts, and the Money Market Fund vehicles, must have a "high credit rating" as prescribed in the minimum requirements for "high credit rating" set out in Wiltshire Council's annual Treasury Management Strategy.
15. An extract of the appropriate parts from Wiltshire Council's latest Treasury Management Strategy (2016-17) is given in the Annex for information. The full paper will be available from the Wiltshire Council Cabinet reports dated 9th February and can be found on the following link: [Agenda for Cabinet on Tuesday 9th February, 9.30am| Wiltshire Council](#)

Borrowing Policy

16. The Fund will not borrow except by way of temporary loan or overdraft from a bank or otherwise, and then only in exceptional circumstances where it is for the purpose of :

- a) Paying benefits due under the Scheme; or
- b) Meeting investment commitments arising from the implementation of a decision by the Committee to change the balance between the different types of investment.

Management Arrangements

- 17. The management of Wiltshire Pension Fund's cash will be carried out by Wiltshire Council's Treasury Management team under a Service Level Agreement. All treasury management activity related to the Pension Fund will be reported to the Head of Pensions on a monthly basis.
- 18. The Treasury Management Team will inform the Head of Pensions of any change in the criteria for the counterparty list.

EXTRACT FROM WILTSHIRE COUNCIL'S TREASURY MANAGEMENT STRATEGY FOR 2016-17

17. This Council uses Capita Asset Services, Treasury solutions as its external treasury management advisors. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers. It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.
18. Capita provide a creditworthiness service, which employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following overlays:
 - a) credit watches and credit outlooks from credit rating agencies;
 - b) CDS spreads to give early warning of likely changes in credit ratings;
 - c) sovereign ratings to select counterparties from only the most creditworthy countries.
19. This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments. The Council will therefore use counterparties within the following durational bands:
 - a) Yellow – 5 years (this category is for AAA rated Government debt or its equivalent, including an investment instrument – collateralised deposits, where the investment is secured only against local authority debt, namely LOBOs, making them effectively government exposure);
 - b) Dark pink – 5 years for Enhanced money market funds (EMMFs) with a credit score of 1.25
 - c) Light pink – 5 years for Enhanced money market funds (EMMFs) with a credit score of 1.5
 - d) Purple – 2 years;
 - e) Blue – 1 year (only applies to nationalised or semi nationalised UK Banks and their subsidiaries):
 - f) Orange – 1 year;
 - g) Red – 6 months;
 - h) Green – 100 days; and
 - i) No Colour – not to be used.
20. The advisor's creditworthiness service uses a wider array of information than just primary ratings and by using a risk weighted scoring system, does not give undue preponderance to just one agency's ratings.

21. All credit ratings will be monitored at least weekly (daily if there are any updates released by Capita Asset Services). The Council is alerted to changes in ratings of all three agencies through its use of the creditworthiness service.
22. If a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
23. In addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data on a weekly basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.
24. Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, information on government support for banks and the credit ratings of that government support.
25. The Council has determined that it will only use approved counterparties from countries with a minimum sovereign credit rating of AA- from Fitch Ratings.

The Minimum requirements for "high credit quality"

26. In accordance with the DCLG Guidance on Local Government Investments in respect of selection of counterparties with whom investments are placed, Wiltshire Council will comply with the minimum requirements below.
27. Credit ratings will be those issued by Fitch Ratings Ltd in respect of individual financial institutions (as shown below, where F1+ is the highest short term rating and AAA the highest long term rating). An exception is made in respect of money market funds, as shown below, where a different overall AAA rating is the highest.
28. **The minimum requirements for high credit quality, by type of institution, are as follows (please refer also to paragraph 30, relating to the removal of one of the minimum requirements this year):**
 - **Banks incorporated inside the United Kingdom with a short term credit rating of at least F1 or Government backed and their subsidiaries;**
 - **Banks incorporated outside the United Kingdom with a short term credit rating of at least F1+ and a long term rating of A+;**
 - **United Kingdom building societies with a short term credit rating of at least F1 or Government backed;**
 - **All local authorities and public bodies (as defined in S23 of the Local Authorities Act 2003) (ratings are not issued for most of these bodies);**

- **Multilateral development banks (as defined in Statutory Instrument 2004 No. 534) with a short term credit rating of at least F1 and long term credit rating of AAA;**
- **All banks & building societies must have a bank viability rating of at least bbb – except where the counterparty is UK Government backed (fully and partially) – (aaa being the highest, through aa, a and bbb);**
- **Money market funds, which have been awarded the highest possible rating (AAA) from at least one of the following credit rating agencies, Standard and Poor's, Moody's Investor Services Ltd or Fitch Ratings Ltd.; and**
- **Deposits must only be placed in money market funds subject to individual signed management agreements.**

29. In addition to the above criteria, the following limits will be applied to the total cumulative investments placed with an individual institution (or group of institutions where there is common ownership):

a) Up to £15 million:

- **UK incorporated banks with a long term credit rating of at least AA;**
- **Overseas banks that have a long term credit rating of at least AA;**
- **Multilateral development banks;**
- **Local authorities and other public bodies; and**
- **Money market funds.**

b) Up to £12 million:

- **Government backed UK banks and UK building societies and their subsidiaries**

c) Up to £8 million:

- **Other UK incorporated banks (that have a long term credit rating of less than AA but which also satisfy the credit rating conditions within this Strategy);**
- **Other overseas banks (that have a long term credit rating of less than AA but which also satisfy the credit rating conditions within this Strategy);**
- **UK Building societies with long term credit rating of at least A; and**

- Government backed overseas banks and their subsidiaries

30. *The minimum requirement for high credit quality relating to support ratings has been removed this year (previously in paragraph 28), following the changes to Fitch ratings implemented (May 2015) by them in respect of “bail-in”, as approved by Cabinet and Council in February 2015. The ratings were amended in May/June 2015 and implemented under the adoption of the Treasury Strategy 2015-16 by Cabinet/Council and to “authorise the Associate Director, Finance, Revenues & Benefits and Pensions to amend the Strategy accordingly.”*