Report to:	Cabinet Council		Date of Meeting: 26 February 2015 5 March 2015		
Subject:	Treasury Ma	inagemen	t Policy & Strateg	y 2015/2016	
Report of:	Head of Cor	porate Fin	ance & ICT	Wards Affected:	All
Is this a Key	y Decision?	No	Is it included in	the Forward Plan?	No
Exempt/Cor	nfidential	No			

Purpose/Summary

To advise Cabinet of the proposed procedures and strategy to be adopted in undertaking the Treasury Management Function in 2015/2016.

Recommendation(s)

Cabinet recommend to Council : -

- a) The Treasury Management Policy Document for 2015/2016 (Annex A) be agreed;
- b) The Treasury Management Strategy Document for 2015/2016 (Annex B) be agreed;
- c) The amendment to Banking arrangements contained within the Financial Procedures Rules of the Constitution (Para 3) be agreed; and
- d) The basis to be used in the calculation of the Minimum Revenue Provision for Debt Repayment in 2015/2016 (Para 5) be agreed.

How does the decision contribute to the Council's Corporate Objectives?

	Corporate Objective	Positive Impact	Neutral Impact	Negative Impact
1	Creating a Learning Community		\checkmark	
2	Jobs and Prosperity		\checkmark	
3	Environmental Sustainability		\checkmark	
4	Health and Well-Being		\checkmark	
5	Children and Young People		\checkmark	
6	Creating Safe Communities		\checkmark	
7	Creating Inclusive Communities		\checkmark	
8	Improving the Quality of Council Services and Strengthening Local Democracy		\checkmark	

Reasons for the Recommendation:

To enable the Council to effectively manage its treasury activities.

What will it cost and how will it be financed?

- (A) Revenue Costs There are no financial implications as a result of this report.
- (B) Capital Costs None.

Implications:

The following implications of this proposal have been considered and where there are specific implications, these are set out below:

Legal	Local Authorities are required to have regard to the Code of Practice on Treasury Management under the provisions of the Local Government Act 2003		
Equal	ity		
1.	No Equality Implication	/	
2.	Equality Implications identified and mitigated		
3.	Equality Implication identified and risk remains		

Impact on Service Delivery:

None.

What consultations have taken place on the proposals and when?

The Head of Corporate Finance and ICT is the author of the report (FD 3415/15)

The Head of Corporate Legal Services has been consulted and has no comments on the report (LD 2707/15).

Are there any other options available for consideration? None.

Implementation Date for the Decision

With effect from 1st April 2015.

Contact Officer:	Margaret Rawding
Tel:	0151 934 4082
Email:	Margaret.rawding@sefton.gov.uk

Background Papers:

None

1. Background

- 1.1. The Council has previously adopted CIPFA's revised 2001 Code of Practice on Treasury Management in the Public Services which recommends the production of annual Treasury Management Policy and Strategy Documents, and the revision to The Code in 2009 following the Icelandic bank collapse. The Council has also adopted the revisions contained within the 2011 Code.
- 1.2. In addition, the Council has also adopted, and incorporated into both documents:
 - a) The requirements of the 2003 Prudential Code for Capital Finance in Local Authorities; and,
 - b) An Investment Strategy produced in line with guidance from the then Office of the Deputy Prime Minister concerning the investment of surplus funds. This sets out the manner in which the Council will manage its investments, giving priority to the security and liquidity of those investments.
- 1.3. The adopted Council Policy has enabled the finance service to achieve reductions in debt management costs of over £3m in the last three years. This is a result of the proactive work which the Treasury Management Team deliver through rigorous cash flow management and longer term forecasting of financing requirements. The introduction of loans to local businesses and the utilisation of a charity and church based property management portfolio has further added to the key aims of the Council relating to economic investment and value for money.

2. Treasury Management Policy and Strategy Documents

- 2.1. The Code requires the Council to produce:
 - a) A Treasury Management Policy Document which outlines the broad policies, objectives and approach to risk management of its treasury management activities;
 - b) A Treasury Management Strategy Document This sets out specific treasury activities which will be undertaken in compliance with the Policy in 2015/2016; and
 - c) Suitable treasury management practices, setting out the manner in which the organisation will seek to achieve these policies and objectives, prescribing how it will manage and control those activities.

The content of the policy statement and the treasury management practices will follow the recommendations contained in sections 6 and 7 of the Code, subject only to amendment where necessary to reflect the particular circumstances of the Council. Such amendments will not result in the Council materially deviating from the Codes key principles.

2.2. The proposed Policy and Strategy Documents are attached at **Annex A and B** respectively.

2.3. In view of the complex nature of Treasury Management, regular treasury update reports will be presented to the Audit and Governance Committee.

3. Financial Procedure Rules – Banking Arrangements

3.1. The Treasury Management Policy Document at **Annex A** delegates certain responsibilities to the Head of Corporate Finance and ICT, including all executive decisions on borrowing, investment or financing, in line with the Constitution of the Council.

4. Minimum Revenue Provision (MRP) for Debt Repayment Policy Document

- 4.1. The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2008 introduced changes to the calculation of the MRP.
- 4.2. As a transitional arrangement for 2008/09, authorities were able to continue to calculate MRP as in previous years i.e. 4% of the underlying need to borrow for capital purposes, as measured at 31 March 2008. The Council's revenue budget for 2008/09 was constructed on this basis.
- 4.3. To comply with the legislative changes, the Council has, from 2009/10, retained this calculation for borrowing supported through the Revenue Support Grant but for unsupported prudential borrowing, MRP will be calculated using the estimated life method. This links the charges to revenue more closely to the life of the asset. The Council's Revenue Budget for 2014/15 to 2016/17 has been constructed on this basis.
- 4.4. The change in legislation also allows councils to apply an MRP "Holiday" on large projects, the costs of which span a number of financial years. Rather than starting to charge MRP as the expenditure is incurred, the option is given to apply MRP only when the scheme becomes operational. The total level of MRP remains unchanged, only the timing of the charge is altered. This option is considered to be the most appropriate for use within Sefton.

ANNEX A

SEFTON COUNCIL

TREASURY MANAGEMENT

POLICY

<u>2015/2016</u>



CORPORATE FINANCE AND ICT

1. Treasury Management Policy

1.1. The Council defines Treasury Management as:

The management of the Authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.

- 1.2. The Council's Statement of Treasury Management Policy is:
 - a) Effective Treasury Management is acknowledged as providing support towards the achievement of the Council's business and service objectives. It is therefore committed to the principles of achieving best value in Treasury Management, and to employing suitable performance measurement techniques, within the context of effective risk management;
 - b) The successful identification, monitoring and control of risk is regarded as being the prime criteria by which the effectiveness of the Council's Treasury Management activities will be measured. Accordingly, the analysis and reporting of Treasury Management activities will focus on their risk implications for the organisation.
- 1.3 A dedicated team of three officers carries out the day-to-day treasury management activities. Two of the current officers are qualified accountants, and one is a qualified accounting technician. The Service Manager Treasury & Capital has obtained the CIPFA/Association of Corporate Treasurers sponsored qualification CertITM-PF, which is aimed at giving a solid grounding in treasury management and which is tailored to the public sector.
- 1.3.1 Members should receive training in the Treasury Management function, in order to assist in the understanding of this relatively complex area. This will be addressed via the provision of regular reporting to Cabinet, Corporate Services Cabinet Member Meeting and the Audit and Governance Committee, and the provision of specific training on Treasury Management.

2. Treasury Management Strategy

2.1. The Annual Strategy Document sets out in detail how the Treasury Management Activities are to be undertaken in a particular financial year to comply with the Council's Policy. The strategy for 2015/2016 is attached at **Annex B**.

3. Delegated Powers

- 3.1. The Head of Corporate Finance and ICT, under the Council's Constitution, is given the following authority:
 - All money in the hands of the Council shall be aggregated for the purposes of Treasury Management and shall be under the control of the Head of Corporate Finance and ICT, the Officer designated for the purposes of Section 151 of the Local Government Act, 1972;

b) All executive decisions on borrowing, investment or financing shall be delegated to the Head of Corporate Finance and ICT (or in his/her absence the Deputy Section 151 Officer) who shall be required to act in accordance with the Council's Treasury Policy, Treasury Management Practices and CIPFA's Standard of Professional Practice on Treasury Management.

4. **Reporting Requirements/Responsibilities**

4.1. <u>Council</u>

Council will approve, prior to each financial year, the Treasury Management Policy and Strategy Documents. Also, an annual outturn report on Treasury Management activity will be presented before 30th June following the end of the previous financial year.

4.2. <u>Cabinet</u>

Cabinet will:

- a) Consider, prior to each financial year, Treasury Management Policy and Strategy Documents and refer them to Council for approval;
- b) Monitor these documents and approve any in-year amendments necessary to facilitate continued effective Treasury Management;
- c) Receive an annual outturn report on Treasury Management activity prior to the 30th June following each financial year; and
- 4.3. <u>Audit and Governance Committee</u>

Audit and Governance Committee will:

- a) Implement and monitor performance on at least a quarterly basis necessary to facilitate continued effective Treasury Management;
- b) Receive an annual outturn report on Treasury Management activity prior to the 30th June following each financial year; and
- c) Will be responsible for ensuring effective scrutiny of treasury management and policies.

4.4. <u>Head of Corporate Finance and ICT</u>

The Head of Corporate Finance and ICT will:

- a) Draft and submit to Cabinet and Council prior to each financial year, Treasury Management Policy and Strategy Documents;
- b) Implement and monitor these documents resubmitting any necessary inyear revisions/amendments (at least on a quarterly basis) to Cabinet for approval;
- c) Draft and submit an annual outturn report on Treasury Management activity to Cabinet and Council by the 30th June following each financial year-end;

- d) Draft and submit an annual outturn report (and quarterly performance reports) on Treasury Management activity to the Audit & Governance Committee by the 30th June following each financial year-end;
- e) Maintain suitable Treasury Management Practices (TMP), setting out the manner in which the Council will seek to achieve its objectives. The TMP's will also prescribe how the treasury activities will be managed and controlled;
- f) Be responsible for the execution and administration of treasury management decisions; and
- g) Act in accordance with the Council's policy statement and treasury management practices, and also in accordance with CIPFA's Standard of Professional Practice on Treasury Management.

4.5 Borrowing and investments

The Council's borrowing will be affordable, sustainable and prudent and consideration will be given to the management of interest rate risk and refinancing risk. The source from which the borrowing is taken and the type of borrowing should allow the Council transparency and control over its debt.

The Council's primary objective in relation to investments remains the security of capital. The liquidity or accessibility of the Authority's investments followed by the yield earned on investments remain important but are secondary considerations.

ANNEX B1

SEFTON COUNCIL

TREASURY MANAGEMENT

<u>2015/2016</u>



CORPORATE FINANCE AND ICT

SEFTON COUNCIL

Treasury Management Strategy

1. Introduction

- 1.1. The Treasury Management Strategy Document sets out in detail how the Treasury Management Activities are to be undertaken in a particular financial year to comply with the Council's Treasury Management Policy.
- 1.2 The Strategy had been produced to incorporate the requirements of the CIPFA Code of Practice on Treasury Management, the 2011 revised Prudential Code for Capital Finance, and the revised Treasury Management in the Public Services code of Practice and Cross-Sectoral Guidance Notes (2011).

2. Treasury Management Strategy 2015/2016

- 2.1. The Strategy for 2015/2016 covers:
 - a) Treasury Limits in force which will limit the borrowing activity of the Council (2.2);
 - b) Prudential Indicators 2015/2016 to 2017/2018 (2.3);
 - c) Interest Rates (2.4);
 - d) Capital Borrowing (2.5);
 - e) Debt Rescheduling opportunities (2.6);
 - f) Borrowing in advance of need (2.7);
 - g) Investment Strategy (2.8).

2.2. Treasury Limits for 2015/2016

The Treasury Limits set by Council in respect of its borrowing activities are:

The overall or Affordable Borrowing Limit	Maximum £172.500m
(Authorised limit as per Prudential	
Indicators 2015/2016).	

It is a statutory duty under S.3 of the Local Government Act 2003 and supporting regulations, for the Council to determine and keep under review how much it can afford to borrow. The amount so determined is termed the 'Affordable Borrowing Limit'. The Affordable Borrowing Limit takes into account the Council's current debt, an assessment of external borrowing to fund the Capital Programme in 2015/2016, the need to fund capital expenditure previously met from internal funding, and cash flow requirements.

The amount of overall borrowing, which	Maximum	£15m
maybe outstanding by way of short-term		
borrowing.		

The Short–Term Borrowing limit takes into account an assessment of any potential short-term financing the Council may need (e.g. bank overdraft, short-term funding in anticipation of grant receipts). Short-Term Borrowing is defined as being for less than 12 months.

The proportion of external borrow which is subject to variable rate interest	0
, ,	

The limit on variable rate borrowing gives the Council flexibility to finance expenditure at favourable market rates, but ensures Council exposure to variable interest commitments is within prudent levels.

2.3. Prudential Indicators

The following prudential indicators are considered relevant by CIPFA for setting an integrated Treasury Management Strategy.

2.3.1 Interest Rate Exposure Indicators

Fixed rate borrowing and investment has the benefit of reducing the uncertainty surrounding future interest rate changes. However, in looking to improve performance best practice recommends retaining a degree of flexibility through the use of variable rates on at least part of the Treasury Management Activity.

To ensure that the risk associated with improved performance which may be achieved by using variable loans and investments is minimised, it is necessary to establish indicators to control the position. The control is based on setting an upper limit for both fixed and variable interest rate exposures expressed as a percentage of the Council's net outstanding principal sum. The following indicators are to be used:

Upper Limit for Interest Rate Exposures	2015/16 %	2016/17 %	2017/18 %
Upper limit for fixed interest rate exposure expressed as a percentage of net outstanding principal sum	340	340	340
Upper limit for variable interest rate exposure expressed as a percentage of net outstanding principal sum	-20	-20	-20

2.3.2 Non Specified Investment Indicator

The Investment Strategy (Para 2.9) allows non-specified investments (see paragraph 2.9.3 for definition) to be made using funds managed by the Council. The indicator is designed to control the level of such non-specified investments when compared to the overall investments of the Council.

Upper Limit on Non-Specified	2015/16	2016/17	2017/18
Investments	%	%	%
Upper limit on the value of non- specified investments as a percentage of total investments (including long term investments, and investments without credit ratings or rated below A-)	40	40	40

2.3.4 Debt Maturity Indicators

The indicators are designed to be a control over an authority having large concentrations of fixed rate debt needing to be replaced at times of high interest rates. The control is based on the production of a debt maturity profile, which measures the amount of borrowing that is fixed rate that will mature in each period as a percentage of total projected borrowing that is fixed rate. Any borrowing decision and related maturity dates will be taken by the Council mindful of maturity profile limits set out below to ensure large concentrations of debt do not fall due for repayment in any one future financial year. The profile reflects borrowing advice provided by Capita, the Council's Treasury Management Advisors, and has been noted by them.

Maturity Structure of Fixed Rate	Upper Limit	Lower Limit
Borrowing During 2015/2016	%	%
Under 12 month 12 months and within 24 months 24 months and within 5 years 5 years and within 10 years 10 years and above	35% 40% 40% 90%	0% 0% 0% 25%

Policy on the use of external service providers

The Council employs Capita Treasury Solutions Limited as its treasury consultants. Capita were engaged for the first time with effect from 01/04/2014, following a tendering exercise for the contract. The Council recognises that responsibility for treasury management decisions rests with

the Council at all times. It also recognises that there is value in such arrangements in order to acquire access to specialist skills, knowledge, and advice. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly documented, and subjected to regular review and a tendering exercise will be undertaken at the end of this financial year to continue the service.

2.3.5 Principal sums invested for periods linger than 364 days

An upper limit on the value of non-specified investments over 1 year, but less than 5 years is set at 40% of Total Investments. This limit will be kept under review to take advantage of any opportunities in the current money market. Members will be advised of any change.

2.3.6 Credit risk

Virtually any investment involves risk. The Council will consider the credit ratings supplied by a variety of recognised money market organisations, as part of the process to determine the list of Banks where the level of risk is acceptable, with security, then liquidity, being the key aims. As part of this process advice from Capita will be considered, both in terms of maximum duration and level of investment.

The Council also considers alternative assessments of credit strength, and information on corporate developments and of market sentiment towards counterparties. The following key tools are used to assess credit risk:

- Published credit ratings of the financial institution (minimum A- or equivalent) and its sovereign (minimum AA+ for non-UK sovereigns);
- Sovereign support mechanisms;
- Credit default swaps (where quoted);
- Share prices (where available);
- Economic fundamentals, such as a country's net debt as a percentage of its GDP);
- Corporate developments, news, articles, markets sentiment and momentum;
- Subjective overlay.
- Background research in the financial press
- Discussion with our treasury consultants
- Internal discussion with Head of Corporate Finance and ICT

The Council will only invest in institutions that have a Risk Matrix scoring of long term A- (or equivalent).

The Council maintains a full record of each investment decision taken, each of which is authorised by an appropriate level of signatory.

- 2.4. Interest Rates
- 2.4.1 Capita provide regular forecasts of interest rates to assist decisions in respect of:
 - a) Capital Borrowings (2.5);
 - b) Debt Rescheduling opportunities (2.6);
 - c) Temporary borrowing for cash flow; and
 - d) Investments strategy (2.8).
- 2.4.2. **Annex B2** gives details of Capita's central view regarding interest rate forecasts. Capita's forecast is for official interest rates to remain at 0.5% until September 2015, then rising to 0.75% until the end of the financial year.
- 2.4.3. The advice from Capita takes into account financial activity both in the UK and world economies and the impact of major national and international events. It is essential that borrowing and investment decisions are taken mindful of independent forecasts as to interest rate movements. The Council will continue to take account of the advice of Capita.

2.5. <u>Capital Borrowing</u>

2.5.1 The Authority currently holds £144.956m of loans, an decrease of £2.350m on the previous year as part of its strategy for funding previous years' capital programmes as set out below:

Debt Portfolio	
Average Interest Rate	4.44%
<u>Debt Outstanding – Fixed Rate</u>	£m
PWLB	123.946
Other Borrowing	15.760
Other Long Term Liabilities	<u>5.250</u>
Total Debt	144.956

The category of other borrowing (£15.760m) represents finance lease liabilities.

Other long term liabilities (£5.250m) represent transferred debt from the Merseyside Residuary Body.

2.5.2 The Council will raise its required finance, following advice from Capita, from the Public Works Loan Board (PWLB), or other local authorities.

The Council's forecast borrowing requirement for 2015/2016 is as follows:

Borrowing Requirement	Estimate £m
New Borrowing Replacement Borrowing	8.522 10.000
Total Borrowing	18.522

The new borrowing represents the unsupported borrowing as required by the Capital Programme in 2015/16. As noted in 2.5.4 below the Council is internally borrowed, and may take additional borrowing if required in order to reverse this position.

- 2.5.3. The Capita forecast for interest rates is set out at **Annex B2**. This would suggest that the following strategy is followed:
 - The cheapest borrowing will be internal borrowing, which involves running down cash balances and foregoing interest earned at historically low rates. Consideration will always be given to long term borrowing rates and the possibility of rates rising, which could mean borrowing at future higher rates which could erode the advantages of internal borrowing
 - Temporary borrowing from money markets or other local authorities.
- 2.5.4. The authority borrows from the PWLB in order to fund part of the capital programme, the maximum that we can borrow being the Capital Financing Requirement (CFR). PWLB borrowing as at 31 January 2015, plus lease liabilities and other long term liabilities, is £144.956m, as against a CFR of £202.000m for 2015/16. This position is classed as being internally borrowed which does have the advantage of reducing exposure to interest rate and credit risk. To be internally borrowed is a conscious decision to use cash balances to fund capital expenditure, rather than borrow from the PWLB. This position can be reversed at any time by borrowing from the PWLB.
- 2.5.5. 2015/16 is expected to experience a continuation of a low bank rate. Hence, internal borrowing is a sensible option where interest rates on deposits are much lower than the current PWLB borrowing rates, but this will be reviewed should interest rates change.
- 2.5.6. However, as noted in 2.5.3, savings have to be weighed against the potential for incurring long term extra costs by delaying unavoidable new borrowing until later years when PWLB rates are forecast to be higher.
- 2.5.7. Against this background, caution will be adopted in undertaking borrowing in 2015/2016. The Head of Corporate Finance and ICT will monitor the interest

rate market and following advice from Capita, adopt a pragmatic approach to changing circumstances during the year.

2.5.8. External v Internal Borrowing

- 2.5.9. The Council currently has a difference between gross debt and net debt (gross debt net of cash balances) of £54m. The general aim of the strategy would be to reduce the difference between the two in order to reduce the credit risk of holding investments.
- 2.5.10.As noted in 2.5.4 above the Council is internally borrowed. If this continues this will reduce the difference between gross and net debt. Early repayment of debt is, however, not a realistic option since the introduction by the PWLB of significantly lower rates on 1 November 2007, which has now been compounded by a considerable further widening of the difference between new borrowing and repayment has meant that large premiums would be incurred.

2.6. <u>Debt Rescheduling Opportunities</u>

2.6.1. As noted in 2.5.10 above, restructuring with the PWLB is now much less attractive than before due to the potentially large premiums that would be incurred.

The lower interest rate environment and changes in the rules regarding the premature repayment of PWLB loans has adversely affected the scope to undertake meaningful debt restructuring. However, the situation will be monitored and the Council will consider the option of debt restructuring during 2015/2016, should the financial circumstances change.

2.7 Borrowing in advance of need

The Council will not borrow more than, or in advance of, its needs purely to profit from the investment income made on the extra sums borrowed. Any decision to borrow in advance of need will be considered carefully to ensure value for money can be demonstrated and that the Council can ensure the security of such funds.

In determining whether to borrow in advance of need the Council will;

- Ensure that there is a direct link between the capital programme and maturity profile of the existing debt portfolio which supports the need to borrow in advance of need;
- Ensure that the revenue implications of such borrowing have been considered in respect of future plans and budgets; and
- Consider the merits of other forms of funding.

The total amount borrowed will not exceed the authorised borrowing limit of $\pm 172,500$ m. The maximum period between borrowing and expenditure is

expected to be two years, although the Authority is not required to link particular loans with particular items of expenditure.

2.8 The Use of Financial Instruments for the Management of Risks

Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in Section 1 of the Localism Act 2011 removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment). The CIPFA Code requires Councils to clearly detail their policy on the use of derivatives in the annual strategy.

The Council's policy on such items is that it will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Council is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be taken into account when determining the overall level of risk. Embedded derivatives will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria. The current value of any amount due from a derivative counterparty will count against the counterparty credit limit and the relevant foreign country limit.

The Council will only use derivatives after seeking expertise, a legal opinion and ensuring officers have the appropriate training for their use.

2.9. Investment Strategy

2.9.1. The Council manages the investment of its surplus funds internally, and operates in accordance with the Guidance on Local Government Investments issued by CLG, and the 2011 CIPFA Treasury Management in Public Services and Cross Sectoral Guidance Notes. Surplus funds are invested on a daily basis ensuring security, followed by liquidity.

2.9.2 The Council's investment priorities are, in order of priority:

- The security of capital
- The liquidity of capital

The Council will aim to achieve the optimum return on its investments commensurate with proper levels of security and liquidity.

2.9.3. Under the system of guidance investments are classified as Specified or Non Specified.

Specified Investments are those which satisfy the following conditions:

- a) The investment and all related transactions are in sterling;
- b) The investment is short-term i.e. less than 12 months;
- c) The investment does not involve the acquisition of share capital; Either:
 - i) The investment is made with the UK Government or local authority; OR
 - ii) The investment is made with a body or scheme, which has been awarded a high credit rating by a credit rating agency (A-).

Non Specified Investments are those that do not meet the above definition.

2.9.4 The Council's investment portfolio as at 26th January 2015 is set out below:

Investments Portfolio	£m
Specified Investments Non-Specified Investments	51.720 <u>0.000</u>
Total	51.720

- 2.9.5 The Council banks with National Westminster, which is part of the Royal Bank of Scotland Group. It is currently a part government-owned institution. At the present time, it does meet the minimum credit criteria of A- (or equivalent) long term. If the credit rating falls below the Authority's minimum criteria the Bank will continue to be used for short term liquidity requirements (overnight and weekend investments) and business continuity arrangements when no other options are available.
- 2.9.6 The Council Strategy will be:
 - a) To make Specified Investments in line with the above conditions;
 - b) To make Non Specified Investments which satisfy all of the above with the exception of 2.9.3 b) which is extended to a period of less than 2 years for fixed term deposits, and a maximum of 5 years for negotiable instruments such as CDs;

It is suggested that the following investment vehicles should be made available to the authority:

Investment	Reason	Risk
Term deposits made with	Certainty of rate of	Liquid, with potential
banks as listed in annexe	return and repayment of	for deterioration in
B4, following the investment	capital	credit risk. Most Local
criteria as listed in annexe		Authorities are not
B3. Deposits also		credit rated.
acceptable on an overnight		
call basis. Can also deposit		
with Local Authorities.		
Certificates of Deposit with	Certainty of rate and	If not held until
Banks and Building	liquid	maturity, can be sold

Societies		for a capital loss on the secondary market					
Supra-national bonds	Greater levels of security of investment. A fairly liquid investment, though not as liquid as Gilts	High credit rating as placed with EIB and World Bank (AAA rated). Bond price may vary if sold early					
Investments with Registered Providers	Certainty of rate of return and repayment of capital	Most Registered Providers are not credit rated.					
Investments with organisations that do not meet the Council's specified investment criteria (subject to an external credit review and specific advice from TM advisor).	Greater diversification and allows a small portion of the portfolio to be invested at higher rates of return	Investments may not be with credit rated organisations					
AAA rated Money Market Fund (MMF)	Same day liquidity and high credit worthiness due to considerable diversification	High credit rating via the International Money Market Fund Association or IMMFA (AAA rated)					
Other Money Market and Collective Investment Schemes	Strong portfolio diversification	Variable Net Asset Value VNAV funds – potential for receiving less than paid in. Plus long lead time for return of investment.					
Corporate Bonds	Can be sold on the secondary market	Can be sold for a capital loss					
Gilts	Liquid and very secure. Interest paid every six months	High credit rating as Government backed (AAA rated). Bond price may vary if sold early					
Treasury Bills	Liquid and very secure. Duration of < 1year	No interest paid – they are zero-coupon rated, but are typically bought at a discount.					
Debt Management Agency Account Deposit Facility (DMADF)	Secure investment	High credit rating as Government backed (AAA rated). Interest earned low. Investment cannot be repaid early					

The maximum that can be invested in any of the above vehicles is £25m, except for term deposits, MMF's and UK Government investments for which no limit is set. The maximum maturity period in any is 2 years for non-tradable

deposits, and 5 years for deposits that are tradable on the secondary market. However, advice from Capita will be taken into account in determining whether shorter maximum investment period is more appropriate during the year.

It is NOT proposed that the Council will be making any Non Specified Investments in 2015/2016 that do not comply with the above, however, should the situation change, the Head of Corporate Finance and ICT will report to Cabinet requesting appropriate approval to amend the Strategy before any such investments are made.

- 2.9.7 The Bank of England Base Rate has remained significantly low at 0.5%. Capita's projection of interest rates is to remain at 0.5% to September 2015 rising to 0.75% until the end of the financial year (**Annex B2**). Given the volatility of the market, the forecasts can only be used as a general guide to the future position. Consequently for 2015/16, the Authority has taken a prudent view and budgeted for an investment return based upon Capita's base rate projection during 2015/16.
- 2.9.9. In order to pursue the strategy of maximising returns from surplus funds at an acceptable level of security and liquidity, the following Brokers will be utilised for investments of over one month:
 - ii) Sterling International Brokers Limited;
 - iii) Tradition UK Limited;
 - iv) Tullet Prebon Limited.
- 2.9.10 As noted in previous year's report, Cabinet agreed that the limit of investments that can be made to any UK or international banking institution was raised from £15m to £25m. This reflected the fact that our counterparty list became drastically reduced following the downgrading of many banks by the credit rating agencies following the credit crunch. However, now that stability has now entered the banking sector, on an operational basis we are using an institutional or group limit of 10% of total investments in order to increase security of capital by spreading risk.

It should be noted that the previous policy of increasing the investment in groups to 1.5 times that of an individual institution has been removed. An operational maximum limit of £22.5m previously applied to banking groups has also now been removed.

2.9.11The current list of Banks at Annex B4 has been produced for information; this takes account of the most up-to-date credit ratings available in respect of the Banks and Building Societies named, and utilising Capita's creditworthiness advice. It has also been rationalised to only include institutions that are backed by a non-UK sovereign rating of AA+, which implies that national Governments ability, but not willingness, to support the Banks if they were facing financial difficulties. It should be noted that a maximum of £25m can be invested with any one country outside of the UK. The organisations listed will be monitored daily with the assistance of Capita to ensure they continue to meet the requirements for high credit quality as outlined at Annex B3. In the event of a change in credit rating or outlook, the Council, with advice from

Capita, will evaluate its significance and determine whether to include (subject to Cabinet approval) or remove the organisation from the approval list.

2.9.14 If any of the Council's investments appear at risk of loss due to default (i.e. this is a credit related loss, and not one resulting from a fall in price due to movements in interest rates) the Council will make an assessment of whether a revenue provision of an appropriate amount is required.

2.9.15 Performance monitoring

a) Compliance with investment strategy (i.e. level of risk is not exceeded).

b) The performance of the Council's investment strategy will be assessed by monitoring the average interest rate earned against the average 7 day LIBID on a monthly basis.

This will be reported to the Audit and Governance Committee on a quarterly basis, with outturn reports also presented to Cabinet and Council.

2.10 Member and Officer training

CIPFA's Code of Practice requires the Head of Corporate Finance and ICT to ensure that all members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities.

In order to address this, the Service Manager – Treasury & Capital has obtained the CIPFA/Association of Corporate Treasurers sponsored qualification CertITM-PF, which is aimed at giving a solid grounding in treasury management and which is tailored to the public sector. Training will be provided for Members of the Audit & Governance Committee on 25th March 2015 and it is intended for such training to occur at least annually.

CAPITA INTEREST RATE FORECAST

Capita's Interest Forecast as at 26th January 2015

PWLB rates and forecast shown below have taken into account the 20 basis point certainty rate reduction effective as of the 1st November 2012.

	Mar-15	Jun-15	Sep-15	Dec-15	Mar-16	Jun-16	Sep-16	Dec-16	Mar-17	Jun-17	Sep-17	Dec-17	Mar-18
Bank Rate View	0.50%	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	1.50%	1.75%	1.75%	2.00%
3 Month LIBID	0.50%	0.50%	0.60%	0.80%	0.90%	1.10%	1.10%	1.30%	1.40%	1.50%	1.80%	1.90%	2.10%
6 Month LIBID	0.70%	0.70%	0.80%	1.00%	1.10%	1.20%	1.30%	1.50%	1.60%	1.70%	2.00%	2.10%	2.30%
12 Month LIBID	0.90%	1.00%	1.10%	1.30%	1.40%	1.50%	1.60%	1.80%	1.90%	2.00%	2.30%	2.40%	2.60%
5yr PWLB Rate	2.20%	2.20%	2.30%	2.50%	2.60%	2.80%	2.90%	3.00%	3.20%	3.30%	3.40%	3.50%	3.60%
10yr PWLB Rate	2.80%	2.80%	3.00%	3.20%	3.30%	3.50%	3.60%	3.70%	3.80%	3.90%	4.00%	4.10%	4.20%
25yr PWLB Rate	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
50yr PWLB Rate	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
Bank Rate													
Capita Asset Services	0.50%	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	1.50%	1.75%	1.75%	2.00%
Capital Economics	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	-	-	-	-	-
5yr PWLB Rate													
Capita Asset Services	2.20%	2.20%	2.30%	2.50%	2.60%	2.80%	2.90%	3.00%	3.20%	3.30%	3.40%	3.50%	3.60%
Capital Economics	2.20%	2.50%	2.70%	3.00%	3.10%	3.20%	3.30%	3.40%	-	-	-	-	-
10yr PWLB Rate													
Capita Asset Services	2.80%	2.80%	3.00%	3.20%	3.30%	3.50%	3.60%	3.70%	3.80%	3.90%	4.00%	4.10%	4.20%
Capital Economics	2.80%	3.05%	3.30%	3.55%	3.60%	3.65%	3.70%	3.80%	-	-	-	-	-
25yr PWLB Rate													
Capita Asset Services	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
Capital Economics	3.25%	3.45%	3.65%	3.85%	3.95%	4.05%	4.15%	4.25%	-	-	-	-	-
50yr PWLB Rate													
Capita Asset Services	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
Capital Economics	3.30%	3.50%	3.70%	3.90%	4.00%	4.10%	4.20%	4.30%	-	-	-	-	-

ANNEX B3

FITCH RATING EXPLANATION

Short term rating

This places greater emphasis on the liquidity necessary to meet financial commitments.

- F1 highest credit quality + denotes exceptionally strong
- F2 good credit quality
- **F3** fair credit quality

Long term rating

AAA – highest credit quality – lowest expectation of credit risk and exceptionally strong capacity to pay financial commitments

AA - very high credit quality – very low credit risk and very strong capacity to pay financial commitments

A - high credit quality – low credit risk and considered to have strong capacity to pay financial commitments, but may be vulnerable

Viability rating

This assesses how a bank would be viewed if it were entirely independent and could not rely on external support.

- Aaa highest fundamental credit quality
- **aa** very high fundamental credit quality
- a high fundamental credit quality
- bbb good fundamental credit quality
- bb speculative fundamental credit quality
- **b** highly speculative fundamental credit quality
- ccc substantial fundamental risk
- **cc** very high levels of fundamental credit risk
- c exceptionally high levels of fundamental credit risk
- f failed

Support rating

Judgement of a potential supporter's (either sovereign state of parent) propensity to support the bank and it's ability to support it.

- 1 extremely high probability of external support
- 2 extremely high probability of external support
- **3** moderate probability
- 4 limited probability
- 5 cannot rely on support

Investments with UK and International Banks (including the Nationwide Building Society) are limited by the Head of Corporate Finance and ICT to a maximum principal sum of £25m with any of the institutions listed above.

Investment with the Government's Debt Management Account Deposit Facility (DMADF), local authorities or any AAA rated or equivalent Money Market Fund will be limited to a maximum principal sum of $\pounds 25m$. However, the Head of Corporate Finance and ICT can decide day to day maximum sums lower than this; an operational limit of $\pounds 15m$ is currently in place.

SEFTON COUNCIL - STANDARD LENDING LIST

Weekly Credit List: 23/01/2015														
Institution Benchmark: iTraxx Senior Financials Index 59.63 (67.21)							Credi	t Ratings						
Institution Benchmark: iTraxx Senior Financials Index + 95% Confidence Level 67.48 (76.33)														
:		F	itch Ratin	g			Moody	's Ratings				S&P Ratin	igs	
	Long Term Status	Long Term	Short Term	Via- bility	Sup port	Long Term Status	Long Term	Short Term	FSR Stat us	FS R	Long Ter m Stat us	Long Term	Short Term	CAPITA Suggested Duration (CDS Adjusted with manual override)
•	_													
Australia	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
Australia and New Zealand Banking Group Ltd	SB	AA-	F1+	aa-	1	SB	Aa2	P-1	SB	B-	SB	AA-	A-1+	R - 6 mths
Commonwealth Bank of Australia	SB	AA-	F1+	aa-	1	SB	Aa2	P-1	SB	B-	SB	AA-	A-1+	R - 6 mths
Macquarie Bank Limited	SB	Α	F1	а	3	SB	A2	P-1	SB	C-	SB	A	A-1	G - 100 days
National Australia Bank Ltd	SB	AA-	F1+	aa-	1	SB	Aa2	P-1	SB	B-	SB	AA-	A-1+	R - 6 mths
Westpac Banking Corporation	SB	AA-	F1+	aa-	1	SB	Aa2	P-1	SB	B-	SB	AA-	A-1+	R - 6 mths
Canada	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
Bank of Montreal	SB	AA-	F1+	aa-	1	NO	Aa3	P-1	SB	C+	NO	A+	A-1	0 - 12 mths
Bank of Nova Scotia	SB	AA-	F1+	aa-	1	NO	Aa2	P-1	NO	B-	NO	A+	A-1	0 - 12 mths
Canadian Imperial Bank of Commerce	SB	AA-	F1+	aa-	1	NO	Aa3	P-1	SB	C+	NO	A+	A-1	0 - 12 mths
National Bank of Canada	SB	A+	F1	a+	1	NO	Aa3	P-1	SB	С	NO	A	A-1	R - 6 mths
Royal Bank of Canada	SB	AA	F1+	аа	1	NO	Aa3	P-1	SB	C+	NO	AA-	A-1+	O - 12 mths
Toronto Dominion Bank	SB	AA-	F1+	aa-	1	NO	Aa1	P-1	SB	В	NO	AA-	A-1+	0 - 12 mths
Denmark	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
Danske Bank	SB	Α	F1	а	1	SB	A3	P-2	SB	C-	NO	A	A-1	G - 100 days
Finland	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AA+	-	Not Applicable
Nordea Bank Finland plc ~	SB	AA-	F1+	aa-	1	NO	Aa3	P-1	SB	с	NO	AA-	A-1+	0 - 12 mths

ANNEX B4

Pohjola Bank	SB	A+	F1	-	1	NO	Aa3	P-1	SB	C-	NO	AA-	A-1+	0 - 12 mths
Germany	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
Deutsche Bank AG	NO	A+	F1+	а	1	NO	A3	P-2	SB	D+	NO	А	A-1	G - 100 days
DZ Bank AG (Deutsche Zentral- Genossenschaftsbank)	SB	A+	F1+	-	1	SB	A1	P-1	SB	C-	SB	AA-	A-1+	0 - 12 mths
Landesbank Hessen-Thueringen Girozentrale (Helaba)	SB	A+	F1+	-	1	NO	A2	P-1	SB	D+	SB	А	A-1	R - 6 mths
Landwirtschaftliche Rentenbank	SB	AAA	F1+	-	1	SB	Aaa	P-1	-	-	SB	AAA	A-1+	P - 24 mths
NRW.BANK	SB	AAA	F1+	-	1	SB	Aa1	P-1	-	-	SB	AA-	A-1+	P - 24 mths
UniCredit Bank AG (Suspended)	NO	A+	F1+	a-	1	NO	Baa1	P-2	SB	D+	NO	A-	A-2	N/C - 0 mths
Hong Kong	SB	AA+	-	-	-	SB	Aa1	-	-	-	SB	AAA	-	Not Applicable
The Hong Kong and Shanghai Banking Corporation Ltd	SB	AA-	F1+	aa-	1	SB	Aa2	P-1	SB	В	SB	AA-	A-1+	0 - 12 mths
Luxembourg	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
Banque et Caisse d'Epargne de l'Etat	-	-	-	-	-	NO	Aa1	P-1	SB	С	SB	AA+	A-1+	P - 24 mths
Clearstream Banking	SB	AA	F1+	аа	1	-	-	-	-	-	SB	AA	A-1+	P - 24 mths
Netherlands	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AA+	-	Not Applicable
Bank Nederlandse Gemeenten	NO	AAA	F1+	-	1	NO	Aaa	P-1	-	B-	SB	AA+	A-1+	P - 24 mths
Cooperatieve Centrale Raiffeisen Boerenleenbank BA (Rabobank Nederland)	NO	AA-	F1+	-	1	NO	Aa2	P-1	NO	B-	NO	A+	A-1	0 - 12 mths
ING Bank NV	NO	A+	F1+	а	1	NO	A2	P-1	SB	C-	NO	А	A-1	R - 6 mths
Nederlandse Waterschapsbank N.V	-	-	-	-	-	NO	Aaa	P-1	-	C+	SB	AA+	A-1+	P - 24 mths
Norway	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
DnB Bank	-	-	-	-	-	NO	A1	P-1	SB	C-	SB	A+	A-1	R - 6 mths
Singapore	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
DBS Bank Ltd	SB	AA-	F1+	aa-	1	SB	Aa1	P-1	SB	В	SB	AA-	A-1+	0 - 12 mths
Oversea Chinese Banking Corporation Ltd	SB	AA-	F1+	aa-	1	SB	Aa1	P-1	SB	В	SB	AA-	A-1+	0 - 12 mths
United Overseas Bank Ltd	SB	AA-	F1+	aa-	1	SB	Aa1	P-1	SB	В	SB	AA-	A-1+	0 - 12 mths
Sweden	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
Nordea Bank AB	SB	AA-	F1+	aa-	1	NO	Aa3	P-1	SB	С	NO	AA-	A-1+	0 - 12 mths
Skandinaviska Enskilda Banken AB	PO	A+	F1	a+	1	NO	A1	P-1	SB	C-	NO	A+	A-1	R - 6 mths

Swedbank AB	PO	A+	F1	a+	1	NO	A1	P-1	SB	C-	NO	A+	A-1	R - 6 mths
Svenska Handelsbanken AB	SB	AA-	F1+	aa-	1	NO	Aa3	P-1	SB	С	NO	AA-	A-1+	0 - 12 mths
Switzerland	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AAA	-	Not Applicable
Credit Suisse AG	SB	A	F1	а	1	NO	A1	P-1	NO	C-	NO	A	A-1	R - 6 mths
UBS AG	SB	A	F1	а	1	NO	A2	P-1	SB	C-	NO	A	A-1	R - 6 mths
U.К	SB	AA+	-	-	-	SB	Aa1	-	-	-	SB	AAA	-	Not Applicable
Abbey National Treasury Services plc	SB	A	F1	-	-	NO	A2	P-1	-	-	-	-	-	R - 6 mths
Bank of New York Mellon (International) Ltd	SB	AA-	F1+	-	1	-	-	-	-	-	-	-	-	0 - 12 mths
Barclays Bank plc	SB	A	F1	а	1	NO	A2	P-1	SB	C-	NO	A	A-1	R - 6 mths
Citibank International Plc ~	SB	A	F1	-	1	SB	A2	P-1	SB	C-	SB	Α	A-1	G - 100 days
Close Brothers Ltd	SB	A	F1	а	5	SB	A3	P-2	SB	С	-	-	-	G - 100 days
Credit Suisse International ~	SB	A	F1	-	1	NO	A1	P-1	-	-	NO	A	A-1	R - 6 mths
Goldman Sachs International ~	SB	A	F1	-	-	SB	A2	P-1	-	-	SB	Α	A-1	G - 100 days
Goldman Sachs International Bank ~	SB	A	F1	-	-	SB	A2	P-1	SB	D+	SB	A	A-1	G - 100 days
HSBC Bank plc	SB	AA-	F1+	a+	1	NO	Aa3	P-1	SB	С	NO	AA-	A-1+	0 - 12 mths
MBNA Europe Bank	NO	A-	F1	-	1	-	-	-	-	-	-	-	-	G - 100 days
Merrill Lynch International	NO	A	F1	-	1	-	-	-	-	-	SB	А	A-1	R - 6 mths
Morgan Stanley & Co. International plc ~	-	-	-	-	-	PO	A3	P-2	-	-	SB	А	A-1	G - 100 days
Santander UK plc	SB	A	F1	а	1	NO	A2	P-1	PO	C-	NO	A	A-1	R - 6 mths
Standard Chartered Bank	NO	AA-	F1+	aa-	1	SB	A1	P-1	SB	B-	NO	A+	A-1	R - 6 mths
Sumitomo Mitsui Banking Corporation Europe Ltd ~	SB	A-	F1	-	1	SB	A1	P-1	SB	С	NO	A+	A-1	G - 100 days
UBS Ltd ~	SB	A	F1	-	1	NO	A2	P-1	-	-	NO	A	A-1	R - 6 mths
U.S.A	SB	AAA	-	-	-	SB	Aaa	-	-	-	SB	AA+	-	Not Applicable
Bank of America, N.A.~	NO	A	F1	a-	1	SB	A2	P-1	SB	C-	SB	А	A-1	R - 6 mths
Bank of New York Mellon, The	SB	AA-	F1+	aa-	1	SB	Aa2	P-1	SB	B-	SB	AA-	A-1+	0 - 12 mths
BOKF, NA	SB	A	F1	а	5	SB	A1	P-1	SB	B-	SB	А	A-1	R - 6 mths
Citibank, N.A. ~	SB	A	F1	а	1	SB	A2	P-1	SB	C-	SB	А	A-1	G - 100 days
HSBC Bank USA, N.A.	SB	AA-	F1+	a-	1	SB	A1	P-1	SB	C-	NO	AA-	A-1+	0 - 12 mths
JPMorgan Chase Bank NA	SB	A+	F1	a+	1	SB	Aa3	P-1	SB	С	SB	A+	A-1	O - 12 mths

Northern Trust Company	SB	AA-	F1+	aa-	5	SB	A1	P-1	SB	B-	SB	AA-	A-1+	0 - 12 mths
State Street Bank and Trust Company	SB	AA-	F1+	aa-	1	SB	Aa3	P-1	SB	B-	SB	AA-	A-1+	0 - 12 mths
U.S. Bancorp	SB	AA-	F1+	aa-	5	SB	A1	P-1	-	-	SB	A+	A-1	0 - 12 mths
Wells Fargo Bank NA	SB	AA-	F1+	aa-	1	SB	Aa3	P-1	SB	C+	SB	AA-	A-1+	0 - 12 mths
Coventry BS	SB	A	F1	а	5	SB	A3	P-2	SB	C	-	-	-	G - 100 days
Leeds BS	SB	A-	F1	a-	5	SB	A3	P-2	SB	C	-	-	-	G - 100 days
Nationwide BS	SB	A	F1	а	1	NO	A2	P-1	SB	С	NO	A	A-1	R - 6 mths
AAA rated and Government backed securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Collateralised LA Deposit*	-	AA+	-	-	-	-	Aa1	-	-	-	-	AAA	-	No Data Available
Debt Management Office	-	AA+	-	-	-	-	Aa1	-	-	-	-	AAA	-	No Data Available
Supranationals	-	ААА	-	-	-	-	Aaa	-	-	-	-	ААА	-	No Data Available
UK Gilts	-	AA+	-	-	-	-	Aa1	-	-	-	-	AAA	-	No Data Available
Lloyds Banking Group plc	NO	A	F1	a-	1	NO	A2	-	-	-	NO	A-	A-2	Not Applicable
Bank of Scotland Plc	NO	A	F1	a-	1	NO	A1	P-1	SB	C-	NO	A	A-1	Not Applicable
Lloyds Bank Plc	NO	A	F1	a-	1	NO	A1	P-1	SB	C-	NO	A	A-1	Not Applicable
Royal Bank of Scotland Group plc	NO	A	F1	bbb	1	NO	Baa2	P-2	-	-	NO	BBB+	A-2	Not Applicable
National Westminster Bank Plc	NO	A	F1	bbb	1	NO	Baa1	P-2	NO	D+	NO	A-	A-2	Not Applicable
The Royal Bank of Scotland Plc	NO	A	F1	bbb	1	NO	Baa1	P-2	NO	D+	NO	A-	A-2	Not Applicable