

Schedule to the Statement of Treasury Management Practices

TMP 1 – TREASURY MANAGEMENT RISK MANAGEMENT

The Director of Finance will design, implement and monitor all arrangements for the identification, management and control of treasury management risk, will report at least annually on the adequacy/suitability thereof, and will report, as a matter of urgency, the circumstances of any actual or likely difficulty in achieving the organisation's objectives in this respect, all in accordance with the procedures set out in TMP 6 Reporting requirements and management information arrangements.

[1] Credit and Counterparty Risk Management

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

A key objective of the Council's treasury management activities is the security of the principal sums it invests. Accordingly, it will ensure that its counterparty lists and limits reflect a prudent attitude towards sovereign states, geographical areas, sectors and organisations with which funds may be deposited, and will limit its investment activities to the instruments, methods and techniques referred to in TMP4 Approved Instruments Methods and Techniques. It also recognises the need to have, and will therefore maintain, a formal counterparty policy in respect of those organisations from which it may borrow, or with whom it may enter into other financing arrangements.

Credit ratings will be used to select credit worthy counterparties for placing investments with. The Fitch credit ratings will be used as the default option, but ratings from Moodys and Standards and Poors will also be monitored. Sector Treasury Services will provide regular updates of changes to all ratings relevant to the Council.

The Director of Finance will formulate suitable criteria for assessing and monitoring the credit risk of investment counterparties and shall construct a lending list comprising maturity periods, type, group, sector, country and counterparty limits. The investment limits for counterparties will be approved as part of the Treasury Management Strategy Statement. The limits approved for 2010/11 are reproduced at **[Annex 4]**.

Credit ratings for individual counterparties can change at any time. The Principal Accountants are responsible for maintaining the approved lending list in accordance with the approved credit rating criteria for authorisation by either the Chief Executive, Director of Finance or Chief Accountant.

The Council will not rely solely on credit ratings in order to select and monitor creditworthiness of counterparties. In addition to credit ratings it will use other sources of information including financial press, market data, information on government support for banks and the credit ratings of that government support.

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[2] Liquidity Risk Management

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

This Council will ensure it has adequate though not excessive cash resources, borrowing arrangements, overdraft or standby facilities to enable it at all times to have the level of funds available to it which are necessary for the achievement of its business/service objectives.

This Council will only borrow for short term cash flow purposes or if the Director of Finance, under delegated powers, feels it is economically prudent to do so.

The Council's target bank position is not to be in debit or credit by more than £50,000 in total across all of its operational bank accounts.

[3] Interest Rate Risk Management

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

This Council will manage its exposure to fluctuations in interest rates with a view to securing its interest revenues, in accordance with the amounts provided in its budgetary arrangements as amended in accordance with TMP6 Reporting requirements and management information arrangements.

At the time of setting the budget, advice will be sought from the Council's Treasury Advisors as to the reasonableness of the rate used for budgeting purposes. If a downturn in the market is expected in the budget period and consequently an alternative rate advised, this will be heeded.

[4] Exchange Rate Risk Management

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

The Council will not place any investments that directly expose it to exchange rate risk.

[5] Refinancing Risk Management

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

The Council is currently debt free and is, therefore, not exposed to this risk.

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[6] Legal and Regulatory Risk Management

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

The Council will ensure that all of its treasury management activities comply with its statutory powers and regulatory requirements. It will demonstrate such compliance, if required to do so, to all parties with whom it deals in such activities. In framing its credit and counterparty policy under TMP1[1] credit and counterparty risk management, it will ensure that there is evidence of counterparties' powers, authority and compliance in respect of the transactions they may effect with the organisation, particularly with regard to duty of care and fees charged.

It is recognised that future legislative or regulatory changes may impact on its treasury management activities and, so far as it is reasonably able to do so, the Council will seek to minimise the risk of these impacting adversely upon its activities.

The treasury management activities of this Council shall comply fully with legal statute, Codes of Practice and the regulations of the Council. These are:

- Local Government Act 2003
- S.I. 2003 No.2938 Local Government Act 2003 (Commencement No.1 and Transitional Provisions and Savings) Order 2003 13.11.03
- S.I. 2003 No.3146 Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 and associated commentary 10.12.03
- S.I. 2004 No.533 Local Authorities (Capital Finance) (Consequential, Transitional and Savings Provisions) Order 2004 8.3.04
- S.I. 2004 No.534 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2004 8.3.04
- Guidance on Investments ODPM 12.3.2004
- Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2006 Statutory Instrument No. 521
- S.I. 2007 no. 573 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2007
- Local Government and Public Involvement in Health Act 2007 s238(2) – power to issue guidance; to be used re: MRP
- S.I. 2008 no. 414 f(Capital Finance and Accounting) (Amendment) (England) Regulations 2008
- S.I. 2009 no. 321 (Capital Finance and Accounting) (Amendment) (England) Regulations 2009
- S.I. 2009 no. 2272 The Local Authorities (Capital Finance And Accounting) (England) (Amendment) (No.2) Regulations 2009
- S.I. 2009 no. 3093 The Local Government Pension Fund Scheme (Management and Investment of Funds) Regulations 2009
- Guidance on Housing Capital Receipts Pooling ODPM 23.3.2004
- Requirement to set a balanced budget - Local Government Finance Act 1992 section 32 for billing authorities and section 43 for major precepting authorities.
- Local Government Finance Act 1988 section 114 – duty on the responsible officer to issue a report if the Council is likely to get into a financially unviable position.

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- Allocation of financing costs to the HRA (housing authorities) – annual determination by Secretary of State
- Definition of HRA capital expenditure - Local Government and Housing Act 1989 section 74 (1)
- CIPFA's Treasury Management Codes of Practice and Guidance Notes 2009
- CIPFA Prudential Code for Capital Finance in Local Authorities revised 2009
- CIPFA Guide for Chief Financial Officers on Treasury Management in Local Authorities 1996
- CIPFA Standard of Professional Practice on Treasury Management 2002
- CIPFA Standard of Professional Practice on Continuous Professional Development 2005
- CIPFA Standard of Professional Practice on Ethics 2006
- The Good Governance Standard for Public Services 2004
- LAAP Bulletins
- SORP – Code of Practice on Local Authority Accounting in the United Kingdom: A Statement of recommended Practice
- PWLB circulars on Lending Policy
- The Non Investment Products Code (NIPS) - (formerly known as The London Code of Conduct) for principals and broking firms in the wholesale markets.
- Financial Services Authority's Code of Market Conduct
- The Council's Constitution
- The Council's Financial Rules

[7] Fraud, Error and Corruption, and Contingency Management

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

The Council will ensure that it has identified the circumstances which may expose it to the risk of loss through fraud, error, corruption or other eventualities in its treasury management dealings. Accordingly, it will employ suitable systems and procedures, and will maintain effective contingency management arrangements, to these ends. The Council will therefore:

- Seek to ensure an adequate division of responsibilities and maintenance at all times of an adequate level of internal check which minimises such risks.
- Fully document all its treasury management activities so that there can be no possible confusion as to what proper procedures are.
- Staff will not be allowed to take up treasury management activities until they have had proper training in procedures and are then subject to an adequate and appropriate level of supervision.
- Records will be maintained of all treasury management transactions so that there is a full audit trail and evidence of the appropriate checks being carried out.

Full details of the day to day procedures are described in the Council's Treasury Management Procedure notes.

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[8] market risk management

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

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

TMP 2 – PERFORMANCE MEASUREMENT

The Council has a number of approaches to evaluating treasury management decisions. These include:

- Weekly notification of investments held to the treasury management team.
- Quarterly reviews carried out by the treasury management team in conjunction with our treasury management consultants.
- Quarterly monitoring reports to the Finance and Property Advisory Board and Audit Committee.
- Annual review after the end of the year as reported to Cabinet/Audit Committee.

An Annual Treasury Report is submitted to the Cabinet each year after the close of the financial year which reviews the performance of the investment portfolio. This report shall contain the following:

- Total investments at the beginning and close of the financial year
- Long term investment decisions made
- Investment income received
- Explanations for variance in investment income
- Average interest rate achieved
- Equated principal for the year
- Details of any borrowing
- Confirmation of compliance with Prudential and Treasury Indicators
- Performance against treasury management targets

Any likely variation in investment interest will be reported to Cabinet via the Financial Planning and Control Report to the Finance and Property Advisory Board and the Treasury Management Monitoring Report to the Audit Committee.

TMP 3 – DECISION MAKING ANALYSIS

The Accountancy Team record the details of each investment on the daily investment record sheet and on the investment spreadsheet. The details recorded must include the:

- Counterparty name
- Counterparty bank details
- Start Date
- Maturity Date
- Principal Invested

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- Interest Rate
- Broker name
- Date and time of transaction
- Name of the officer proposing the transaction
- Name of the officer authorising the transaction

The following records are also to be kept:

- Daily cash balances
- Broker confirmations
- Counterparty confirmations

In respect of every treasury management decision made the Council will:

- Above all be clear about the nature and extent of the risks to which it may become exposed.
- Be certain about the legality of the decision reached and the nature of the transaction, and that all authorities to proceed have been obtained.
- Be content that the documentation is adequate both to deliver its objectives and protect its interests and to deliver good housekeeping.
- Ensure that third parties are judged satisfactory in the context of the Council's creditworthiness policies, and that limits have not been exceeded.
- Be content that the terms of any transactions have been fully checked against the market, and have been found to be competitive.

In respect of investment decisions, the Council will:

- Consider the optimum period, in the light of cash flow availability and prevailing market conditions.
- Consider the alternative investment products and techniques available, especially the implications of using any which may expose the Council to changes in the value of its capital.
- Determine appropriate credit policy limits and criteria to minimise the Council's exposure to credit worthiness and other investment risks.

TMP 4 – APPROVED INSTRUMENTS, METHODS AND TECHNIQUES

Approved Activities of the in-house treasury management operation are as follows:

- Managing cash flow
- Banking activities
- Lending
- Consideration, approval and use of new financial instruments and treasury management techniques
- Managing the underlying risk associated with the Council's capital financing and surplus funds activities

Approved instruments for investments are listed in the Treasury Management Policy and Strategy and include:

- Fixed Deposits (including forward deals)

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- Deposits on call
- Money Market Fund (MMF) deposits
- Debt Management Office
- Local Authorities

TMP 5 – ORGANISATION, CLARITY AND SEGREGATION OF RESPONSIBILITIES AND DEALING ARRANGEMENTS

The responsibilities for treasury management are allocated as follows:

Full Council

- approves the Treasury Management Policy and Strategy

Cabinet

- receives treasury management monitoring report during the year via the Audit Committee with one taking the form of an annual report for the year
- approval of amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices
- budget consideration and approval
- approval of the division of responsibilities
- approving the selection of external service providers and agreeing terms of appointment

Audit Committee

- reviewing the treasury management policy and procedures and making recommendations to Cabinet and Full Council
- receives the treasury management monitoring during the year with one taking the form of an annual report for the year

The responsibilities for treasury management officers are as follows:

Director of Finance

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance
- submitting regular treasury management policy reports
- submitting budgets and budget variations
- receiving and reviewing management information reports
- reviewing the performance of the treasury management function
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function
- ensuring the adequacy of internal audit, and liaising with external audit
- recommending the appointment of external service providers
- take the most appropriate form of borrowing, if required, from approved sources, and to make the most appropriate form of investments in approved instruments
- ensure that Treasury Management Policy is adhered to, and if not will bring the matter to the attention of elected members as soon as possible

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- prior to entering into any capital financing, lending or investment transaction, it is the responsibility of the Director of Finance to be satisfied, by reference to the Council's legal department and external advisors as appropriate, that the proposed transaction does not
- breach any statute, external regulation or the Council's Constitution or Financial Rules.

Accountancy

Treasury Management activities are carried out by a small number of officers within the Accountancy Section which can make it difficult at times to separate out all the duties, particularly during absences. However the transfer of funds will always be carried out by two separate authorised officers.

- Execution of transactions
(Dealing direct with counterparties is permitted, provided that it is appropriate and it is believed that better terms can be obtained. At present, most deals are arranged this way because investments are being made with Business Reserve Accounts, Call Accounts and Money Market Funds.)
- Adherence to agreed policies and practices on a day-to-day basis
- Maintaining relationships with counterparties and external service providers
- Supervising treasury management staff
- Monitoring performance on a day-to-day basis
- Submitting management information reports to the Director of Finance and Treasury Management Team
- Identifying and recommending opportunities for improved practices

The Head of the Paid Service – the Chief Executive

- Ensuring that the system is specified and implemented
- Ensuring that the responsible officer reports regularly to Cabinet treasury policy, activity and performance

The Monitoring Officer – the Head of Legal Services

- Ensuring compliance by the responsible officer with the treasury management policy statement and treasury management practices and that they comply with the law
- Being satisfied that any proposal to vary treasury policy or practice complies with law or any code of practice
- Giving advice to the responsible officer when advice is sought

Internal Audit

- Reviewing compliance with approved policy and treasury management practices
- Reviewing division of duties and operational practice
- Assessing value for money from treasury activities

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Treasury Management Team (Comprised of Chief Executive, Director of Finance, Chief Accountant and Principal Accountant)

- Making strategic decisions on investments and borrowing within the constraints of the Treasury Management Strategy and Investment Strategy for 2010/11
- Considering quarterly performance information
- Approving internally managed investments of longer than overnight
- Monitoring the investment portfolio on a day to day basis

TMP 6 – REPORTING REQUIREMENTS AND MANAGEMENT INFORMATION ARRANGEMENTS

Treasury Management activities shall be reported on as follows:

Treasury Management Policy and Strategy

The Treasury Management Strategy Statement sets out the specific expected treasury activities for the forthcoming financial year. This strategy will be submitted to the Audit Committee, Cabinet and then to the full Council for approval before the commencement of each financial year. The Treasury Management Strategy Statement includes the following:

- Prudential and Treasury Indicators
- The current investment position
- Prospects for interest rates
- Investment strategy
- Creditworthiness policy
- The Council's risk appetite in respect of security, liquidity and optimum performance
- Which specified and non specified instruments the Council will use
- The Council's policy on the use of credit ratings and other credit risk analysis
- Techniques to determine creditworthy counterparties for its approved lending list
- Which credit rating agencies the Council will use
- How the Council will deal with changes in ratings, rating watches and rating outlooks
- Limits for individual counterparties and group limits
- Levels of cash balances
- Interest rate outlook
- Budget for investment interest

Regular Monitoring

The Council will review its treasury management activities during the year and prepare an out-turn report on the full year.

TMP 7 – BUDGETING, ACCOUNTING AND AUDIT ARRANGEMENTS

The accounts are drawn up in accordance with the Code of Practice on Local Authority Accounting in Great Britain that is recognised by statute as representing proper accounting practices. The Council has also adopted in full the principles set out in the Treasury

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Management in the Public Services Code of Practice together with those of its specific recommendations that are relevant to this Council's treasury management activities.

Due regard is given to the Statements of Recommended Practice and Accounting Standards as they apply to Local Authorities in Great Britain.

The Director of Finance prepares a medium term financial plan with Prudential and Treasury Indicators for treasury management which will incorporate the budget for the forthcoming year and provisional estimates for the following five years.

The information required by External Auditors includes:

- Details of interest rates applied to internal investments
- Calculation of interest on working balances
- Interest accrual calculation
- Principal and interest charges reports
- Treasury Management Policy and Strategy
- Review of observance of limits set by Prudential and Treasury Indicators

Information would also be required in respect of the following if the Council were not debt free:

- Reconciliation of loans outstanding in the financial ledger to Treasury Management records
- Maturity analysis of loans outstanding
- Certificates for new long term loans taken out in the year if applicable
- Reconciliation of loan interest, discounts received and premiums paid to financial ledger by loan type
- Calculation of loans fund interest and debt management expenses

Regular budget monitoring reports go to Cabinet via the finance and Property Advisory Board which highlight any variances between budgets and spend in order that the Council can assess its financial position. Details of investment interest are included within this report.

TMP 8 – CASH AND CASH FLOW MANAGEMENT

A cash flow model has been developed which forecasts cash flow projections on a daily basis. This is prepared in advance of the year based on the previous years' cash flow records, adjusted for known changes in levels of income and expenditure and also changes in payments and receipts dates. These details are supplemented on an ongoing basis by information received of new or revised amounts to be paid or received as and when they are known. The model is updated on a daily basis.

NatWest Bankline is used to access transactional data across its 12 accounts, to download information and to assist in the monthly bank reconciliation.

It is Council policy to pay as many creditors by Bacs as possible within 10 days of the date an invoice is received and by no later than 30 days from that date, however invoices are paid as soon as they are authorised via a weekly payment run.

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Housing benefit payments and council tax and business rate refunds are also paid on a weekly basis, predominantly by Bacs.

All money received, will without unreasonable delay, be passed to the Exchequer Section to receipt and deposit in the Council's banking accounts.

TMP 9 – MONEY LAUNDERING

Money laundering has the objective of concealing the origin of money generated through criminal activity. Legislation has given a higher profile to the need to report suspicions of money laundering. The Proceeds of Crime Act (POCA) 2002 established the main offences relating to money laundering. In summary, these are:

- Concealing, disguising, converting, transferring or removing criminal property from England and Wales, from Scotland or from Northern Ireland
- Being concerned in an arrangement which a person knows or suspects facilitates the acquisition, retention, use or control of criminal property
- Acquiring, using or possessing criminal property.

These apply to all persons in the UK in a personal and professional capacity. Any person involved in any known or suspected money-laundering activity in the UK risks a criminal conviction. Other offences under the POCA include:

- Failure to disclose money-laundering offences
- Tipping off a suspect, either directly or indirectly
- Doing something that might prejudice an investigation – for example, falsifying a document.

The Terrorism Act 2000 made it an offence of money laundering to become concerned in an arrangement relating to the retention or control of property likely to be used for the purposes of terrorism, or resulting from acts of terrorism. All individuals and businesses in the UK have an obligation to report knowledge, reasonable grounds for belief or suspicion about the proceeds from, or finance likely to be used for, terrorism or its laundering, where it relates to information that comes to them in the course of their business or employment.

Organisations pursuing relevant business (especially those in the financial services industry regulated by the FSA) are required to appoint a nominated officer and implement internal reporting procedures; train relevant staff in the subject; establish internal procedures with respect to money laundering; obtain, verify and maintain evidence and records of the identity of new clients and transactions undertaken and report their suspicions. In December 2007 the UK Government published the Money Laundering Regulations 2007, which replaced the Money Laundering Regulations 2003.

Public service organisations and their staff are subject to the full provisions of the Terrorism Act 2000 and may commit most of the principal offences under the POCA, but are not legally obliged to apply the provisions of the Money Laundering Regulations 2007. However, as responsible public bodies, they should employ policies and procedures which

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reflect the essence of the UK's anti-terrorist financing, and anti-money laundering, regimes.

It is not a requirement under POCA for local authorities to require identification from every person or organisation it deals with.

In the course of its Treasury activities, the Council will only lend money to or invest with those counterparties that are on its approved lending list. These will be local authorities, the PwLB, Bank of England and authorised deposit takers under the Financial Services and Markets Act 2000.

All transactions will be carried out by CHAPS or Bacs for making deposits or for repaying loans.

TMP 10 – TRAINING AND QUALIFICATIONS

The Council recognises that relevant individuals will need appropriate and ongoing training in treasury management due to its increasing complexity.

All treasury management staff should receive appropriate training relevant to the requirements of their duties at the appropriate time. Training needs are identified through the annual appraisal process. Additionally, on the job training may also be provided and it will be the responsibility of the Director of Finance to ensure their staff receive the level of training appropriate to their duties.

Treasury management staff and Members as appropriate will attend seminars and courses provided by our treasury management consultants, CIPFA, money brokers etc. The Director of Finance will maintain a record of the training they receive.

Currently, the skills base of the existing treasury management team and operational staff is considered sufficient to meet the needs of the Council at this time. However, in the event of changes to the operational and/or strategic staff in the future consideration is to be given to either recruiting staff who hold a Certificate in International Treasury Management (Public Services) awarded by the Association of Corporate Treasurers in association with CIPFA or to an officer being asked to study for and obtain that certificate.

TMP 11 – USE OF EXTERNAL SERVICE PROVIDERS

This Council will employ the services of other organisations to assist it in the field of treasury management. In particular, it will use external consultants to provide specialist advice in this ever more complex area and, in this regard, currently employs Sector Treasury Services Limited on a 5 year contract that will expire in March 2011. There is a need to ensure there is a full understanding as to what services are being provided and that they meet the needs of this organisation, especially in terms of being objective and free from conflicts of interest.

It will also ensure that the skills of the in house treasury management team are maintained to a high enough level whereby they can provide appropriate challenge to external advice and can avoid undue reliance on such advice. In this respect treasury management staff and their senior management will be required to allocate appropriate levels of time to using the following sources of information so that they are able to develop suitable levels of

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understanding to carry out their duties, especially in challenge and avoiding undue reliance on any single source of information:

- The financial press
- Market data
- Information on government support for banks
- The impact on credit ratings of that government support

Where money brokers are used for borrowing or investment and long term borrowing the Council will seek to spread the business evenly amongst the approved brokers.

The Council will seek to take expert advice on: interest rate forecasts, annual treasury management strategy, timing for borrowing and lending, debt rescheduling, use of various borrowing and investment instruments and on how to select credit worthy counterparties to put on its approved lending list.

A credit rating service is received through the Council's treasury management consultants, the cost of which is included in the consultant's annual fee.

TMP 12 – CORPORATE GOVERNANCE

The Council is committed to the principle of openness and transparency in its treasury management function and in all of its functions.

It has adopted the CIPFA Code of Practice on Treasury management and implemented key recommendations on developing Treasury Management Practices, formulating a Treasury Management Policy Statement and implementing the other principles of the Code.

The documents available for Public Inspection are as follows:

- Treasury Management Policy and Strategy
- Regular Treasury Management monitoring reports
- Revenue Budget
- Capital Programme
- Annual accounts
- Minutes of Council/Cabinet/Audit Committee/Advisory Board meetings