

REPORT TO: CITY GOVERNANCE COMMITTEE – 4 MARCH 2024
REPORT ON: TREASURY POLICY STATEMENT 2024/2025
REPORT BY: EXECUTIVE DIRECTOR OF CORPORATE SERVICES
REPORT NO: 61-2024

1 PURPOSE OF REPORT

This report reviews the Council's Treasury Policy Statement which is intended to govern all borrowing and lending transactions carried out by the Council.

2 RECOMMENDATION

Members are recommended to approve the policies and procedures laid out in the attached Treasury Policy Statement 2024/2025, noting no changes.

3 FINANCIAL IMPLICATIONS

None.

4 INTRODUCTIONS

The Policy and Resources Committee approved the current Treasury Policy Statement on 6th March 2023 (Article III of the Minute of Meeting of the Policy and Resources Committee of 6th March 2023, report no 66-2023 refers). The statement is subject to review annually or earlier in the event of a major policy change.

5 BACKGROUND

5.1 The CIPFA Treasury Management in the Public Services Code of Practice 2017 and Cross-Sectorial Guidance Notes 2018 (The Code)

In December 2017, CIPFA issued a revised Treasury Management Code of Practice and also a revised Prudential Code. These revisions focused particularly on non-treasury investments and especially on major purchases of property with a view to generating substantial increases in income compared to normal treasury management activities. In such, the main change in the revised code extended the definition of "investments" to include other non-financial assets which the organisation holds primarily for financial return, such as investment property portfolios, however for Scottish Councils, the definition of investment properties was already accommodated within the 2010 Investment Regulations.

The Code introduced a requirement for Scottish Councils to list all non-treasury investments and financial guarantees, loans etc. as part of their annual Treasury Management Strategy Statement, and greater explanation for investment in non-financial assets in such areas as their objectives, how they have been appraised, how they have been financed, and what powers were used to undertake them.

It should be noted that whilst nothing in the Code should be taken as overriding statutory provision, CIPFA recommends that all public organisations adopt the revised four clauses of the Code, as part of their standing orders, financial regulations, or other formal policy documents appropriate to their circumstances. In addition, they also recommend the form of words in the Code for the organisation's treasury policy statement and that this should include high level policies for borrowing and investments.

5.2 Revised CIPFA Treasury Management Code and Prudential Code 2021

CIPFA published revised codes on 20th December 2021 and has stated that formal adoption is not required until the 2023/24 financial year. The changes will have impact on future Treasury related reports and risk management framework.

The revised codes will have the following implications:

- a requirement for the Council to adopt a new debt liability benchmark treasury indicator to support the financing risk management of the capital financing requirement;
- clarify what CIPFA expects a local authority to borrow for and what they do not view as appropriate. This will include the requirement to set a proportionate approach to commercial and service capital investment;
- address ESG issues within the Capital Strategy;
- require implementation of a policy to review commercial property, with a view to divest where appropriate;
- create new Investment Practices to manage risks associated with non-treasury investment (similar to the current Treasury Management Practices);
- ensure that any long-term treasury investment is supported by a business model;
- a requirement to effectively manage liquidity and longer-term cash flow requirements;
- amendment to TMP1 to address ESG policy within the treasury management risk framework;
- amendment to the knowledge and skills register for individuals involved in the treasury management function (to be proportionate to the size and complexity of the treasury management conducted by each council);
- a new requirement to clarify reporting requirements for service and commercial investment, (especially where supported by borrowing/leverage).

In addition to the above, all investments and investment income will be required to be attributed to one of the following three purposes:

- Treasury management
- Service delivery
- Commercial return

5.3 Investment Regulations

In accordance with section 40 of the Local Government in Scotland Act 2003, the Scottish Government issued investment regulations (The Local Government Investments (Scotland) Regulations 2010) and finance circular 5/2010 which sets out the requirements to obtain the consent of Scottish ministers for making investments. This report is in accordance with the requirements of these documents.

6 TREASURY POLICY STATEMENT

This document sets out the policies and objectives of the Council's Treasury Management activities and the practices which will be used to achieve these. It contains the following:

- Treasury Management Policy Statement
- Treasury Management Practices Main Principles in 12 key areas.

Please note that there are no revisions to the policy.

7 POLICY IMPLICATIONS

This report has been subject to the Pre-IIA Screening Tool and does not make any recommendations for change to strategy, policy, procedures, services or funding and so has not been subject to an Integrated Impact Assessment. An appropriate senior manager has reviewed and agreed with this assessment.

The major issues identified relate to Risk Management and these are addressed in Section II of the Treasury Policy Statement under TMP1. This is further summarised in the Risk Register which is regularly reported to Committee in the Treasury Management Activity Reports.

8 CONSULTATION

The Council Leadership Team have been consulted in the preparation of this report.

9 BACKGROUND PAPERS

CIPFA Prudential Code for Capital Finance in Local Authorities 2017
CIPFA Code of Practice on Treasury Management 2017
CIPFA Treasury Management in the Public Services Cross-Sectorial Guidance Notes 2018
CIPFA Revised Treasury Management Code and Prudential Code 2021

ROBERT EMMOTT
EXECUTIVE DIRECTOR OF CORPORATE SERVICES

23 FEBRUARY 2024

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DUNDEE CITY COUNCIL

TREASURY POLICY STATEMENT 2024-2025

Executive Director of Corporate Services
March 2024

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1. TREASURY MANAGEMENT POLICY STATEMENT

The Council has adopted the CIPFA Code of Practice on Treasury Management in the Public Services. As part of the adoption of that code, the Council agrees to create and maintain, as the cornerstones for effective treasury management:

- A treasury management policy statement, stating policies, objectives and approach to risk management of its treasury management activities.
- Suitable treasury management practices (TMPs), setting out the manner in which the organisation will seek to achieve those policies and objectives, and prescribing how it will manage and control these activities.

This document outlines the Council's Treasury Management Policy Statement which provides a framework for the Council's treasury management activities. Any reference in this policy to the Executive Director of Corporate Services should be taken to be any other officer which has been given delegated powers.

Dundee City Council defines its treasury management activities as:

"The management of the Council'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."

Subject to any legal restrictions, this definition covers the following activities:

- Arranging, administering and managing all capital financial transactions
- Approving, arranging and administering all borrowing on behalf of the Council
- Cash flow management
- Investment of surplus funds
- Ensuring adequate banking facilities are in place, negotiating bank charges, and ensuring the optimal use by the Council of banking and associated facilities and services

Dundee City Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the organisation and any financial instruments entered into to manage these risks.

Dundee City Council acknowledges that effective treasury management will provide support towards the achievement of its business and services objectives. It is therefore committed to the principles of achieving value for money in treasury management and to employing suitable performance measurement techniques, within the context of effective risk management.

Dundee City Council must comply with the appropriate regulations, codes and guidance when undertaking treasury management activities:

- The Local Authority (Capital Finance and Accounting) (Scotland) Regulations 2016
- The Local Government Investments (Scotland) Regulations 2010
- Local Government in Scotland Act 2003
- CIPFA Treasury Management in the Public Services: Codes of Practice and Cross-sectorial Guidance Notes 2021
- CIPFA Prudential Code for Capital Finance in Local Authorities 2021

2. DELEGATIONS OF AUTHORITY & GOVERNANCE

2.1. Scheme of Delegation

Policy and Resources Committee

- Approve annual treasury management policy and strategy.
- Approve capital strategy
- Review periodic treasury management activity reports.
- Approve amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices.
- Provide budget consideration and approval.

Executive Director of Corporate Services

- Ensure that all the Council's borrowing and lending transactions and practices comply with the CIPFA Code of Practice on Treasury Management in the Public Services.
- Prepare a Treasury Policy Statement which will be approved by the Policy and Resources Committee and reviewed annually.
- Prepare a Capital Strategy which will be approved by the Policy & Resources Committee and reviewed annually.
- On commencement of each financial year submit a report to the Policy and Resources Committee on the Treasury Management Strategy for that year (including forecasts).
- Monitor compliance of activities to approved policies, strategies and practices including the performance of Treasury Management.
- Submit a report to the Policy and Resources Committee twice yearly reviewing the Council's Treasury Management activities, and comparison to forecasts. One of these reports will be an annual report on the Treasury Management activities of the previous financial year.
- Approve the selection and appointment of external service providers and agreeing terms of appointment.
- Ensure the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function.
- Ensure the adequacy of internal audit, and liaise with external audit.
- Ensure preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long-term timeframe.
- Ensure that the capital strategy is prudent, sustainable, affordable in the long term and provides value for money.
- Ensure that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the Council
- Ensure that the Council has appropriate legal powers to undertake expenditure on non-financial assets and their financing.
- Ensure the proportionality of all investments so that the Council does not undertake a level of investing which exposes the Council to an excessive level of risk compared to its financial resources.
- Ensure that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long-term liabilities.
- Provide Policy and Resources Committee with a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees.
- Ensuring that Policy and Resources Committee are adequately informed and understand the risk exposures taken on by the Council.
- Ensuring that the Council has adequate expertise, either in house or externally provided, to carry out the above.
- Ensure creation of Treasury Management Practices which specifically deal with how non-treasury investments will be carried out and managed, to include the following: -
 - Risk management (TMP1 and schedules), including investment and risk management criteria for any material non-treasury investment portfolios;
 - Performance measurement and management (TMP2 and schedules), including methodology and criteria for assessing the performance and success of non-treasury investments;

- Decision making, governance and organisation (TMP5 and schedules), including a statement of the governance requirements for decision making in relation to non-treasury investments; and arrangements to ensure that appropriate professional due diligence is carried out to support decision making;
- Reporting and management information (TMP6 and schedules), including where and how often monitoring reports are taken;
- Training and qualifications (TMP10 and schedules), including how the relevant knowledge and skills in relation to non-treasury investments will be arranged.

Internal Audit

- Provide a resource allocation in the Internal Audit Plan, when considered appropriate by the Senior Manager – Internal Audit, for reviewing the internal controls in place.
- Deliver the assignments detailed in the Internal Audit Plan, discussing and agreeing the scope and objectives, including, where appropriate, recommendations for improving the overall control environment.
- Undertake follow-up and progress reviews as and when required and report, as appropriate, on the findings from these exercises.

3. BORROWING POLICIES

The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet service activities. This will involve both the organisation of the cash flow and where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

Within the prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the Capital Financing Requirement in the preceding year plus the estimates of any additional Capital Financing Requirement for the current year and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes.

3.1. Sources & Methods of Borrowing

The council will generally undertake 2 types of borrowing:

Long term borrowing (over 1 year) – These funds are sourced predominantly from UK Treasury (formerly PWLB) in line with available capacity within the prudential limits set as maximum levels of borrowing. This is the statutory limit (Affordable Capital Expenditure Limit) determined under section 35 (1) of the Local Government in Scotland Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.

Short term borrowing - (under 1 year) – These funds are sourced from other Councils via market brokers or directly. The limit is set by the council as part of its treasury indicators and must not exceed 30% of the net variable rate borrowing.

A detailed list of approved methods of raising capital finance can be found within **TMP4 – Approved Instruments, Methods & Techniques**.

3.2. Borrowing in advance of need

The Council will not borrow in excess of its Capital Financing Requirement with the prime intention to profit from the investment of the extra sums borrowed. In accordance with the revised Code, any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.

3.3. Debt Rescheduling

The Council will monitor opportunities to refinance existing long term debt in order to generate savings or to support the current Treasury Strategy and longer term debt maturity profile, and will

take action as appropriate. The Executive Director of Corporate Services will report to Committee on any such activities.

4. INVESTMENT POLICIES

The Council's investment policy has regard to the Scottish Government's - Investment (Scotland) Regulations 2010, (and accompanying Finance Circular), and the 2021 CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes, ("the CIPFA TM Code"). The Council's investment priorities will be security first, liquidity second and then return.

In accordance with guidance from the Scottish Government and CIPFA, and in order to minimise the risk to investments, the Council applies minimum acceptable credit criteria in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the Short Term and Long-Term ratings.

Ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To this end the Council will engage with its advisors to maintain a monitor on market pricing such as "credit default swaps" and overlay that information on top of the credit ratings.

Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

4.1. Permitted Instruments

The Council may invest monies in accordance with their requirements only by using the following instruments:

- Temporary deposits with an approved institution
- Money Market Funds
- Ultra-short dated bond funds
- Debt Management Office
- Investment Properties
- Loans to other organisations for service reasons and for which specific statutory provision exists* (to a maximum of £30m with £10m with any single party)
- Investment in Council companies, joint ventures, or other entity formed by a Council to deliver services (to a limit of £1.25m).
- Loans to / investment in the loan stock of Council companies
- Investment in Shared Equity Housing Schemes
- Investment in Subordinated Debt of projects delivered via the "HubCo" model
- Investments in share in equity, bond and property funds (on a FVCI basis)
- Foreign currencies, to service overseas contracts

* These loans will normally be made at prevailing market rates but on occasion for service reasons, these may be offered at an interest rate below the market rate but always ensuring that the Council takes account of such issues as State Aid as advised by Link Asset Services. Annual Strategies and Reports will need to recognise all loans to third parties as investments.

4.2. Creditworthiness policy

This Council applies the creditworthiness service provided by Link Asset Services. This service 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:

- credit watches and credit outlooks from credit rating agencies;
- Credit Default Swap spreads to give early warning of likely changes in credit ratings;
- sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of Credit Default Swap 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:

- Yellow 5 years *
- Dark pink 5 years - Enhanced cash funds (Money Market Funds) with 1.25 credit score
- Light pink 5 years - Enhanced cash funds (Money Market Funds) with 1.50 credit score
- Purple 2 years
- Blue 1 year (only applies to nationalised or semi nationalised UK Banks)
- Orange 1 year
- Red 6 months
- Green 100 days
- No colour not to be used

Y	Pi1	Pi2	P	B	O	R	G	N/C
1	1.25	1.5	2	3	4	5	6	7
Up to 5yrs	Up to 5yrs	Up to 5yrs	Up to 2yrs	Up to 1yr	Up to 1yr	Up to 6mths	Up to 100days	No Colour

The Council will not use the approach suggested by CIPFA of using the lowest rating from all three rating agencies to determine creditworthy counterparties. The Link Asset Services creditworthiness service use ratings from all three agencies, but by using a scoring system, it does not give undue preponderance to just one agency's ratings.

All credit ratings will be monitored continuously. The Council is sent a weekly list from Link Asset Services of all the investment counterparties with a summary of the all the ratings changes in the preceding week but is also alerted daily to changes to ratings of all three agencies through its use of the Link Asset Services creditworthiness service.

- 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.
- In addition to the use of Credit Ratings the Council will be advised of information in movements in Credit Default Swap 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 Councils lending list.

Sole reliance will not be placed on the use of this external service. In addition, the Council will also use market data and market information, information on government support for banks and the credit ratings of that government support.

The maximum deposit will be in line with counterparty credit rating as follows:

- F1+ £12m
- F1 £10m
- AAAMf - Money Market Funds £10m
- Ultra-short dated bond funds £10m
- UK Local Authorities £10m
- Debt Management Agency £10m
- Part-Nationalised UK Banks £5m
(with a minimum holding of 20% as per Link Asset Services approach)
- OEICs - Government Liquidity, Gilt, Bond and Equity Funds* 70% of asset class with any one institution

* Common Good and Insurance Funds only or at discretion of Executive Director of Corporate Services – see section 7 "Treasury Risk Register"

4.3. Country limits

The Council will only use UK regulated institutions.

4.4. Policy on longer term investments

Until the new investment regulations took effect from 1 April 2010, investing by Scottish local Councils was limited to one year. This restriction has been removed from that date and this Council accordingly wishes to be able to make use of this power at times when such investing is both appropriate and attractive.

This may be exercised for general treasury management purposes in line with Capital Financing Requirements within the Capital Plan with the exception of earmarked investments made at the Discretion of the Executive Director of Corporate Services.

5. CASH & LIQUIDITY POLICIES

The purpose of this policy is to outline the principles of cash management across the Council and for those who it undertakes Treasury and Banking Services to ensure the efficient and effective management of cash resources to maximise investment income while ensuring sufficient cash on hand to meet obligations and avoid funding shortfalls.

This policy also contributes towards meeting the Council's obligations to all relevant parties by ensuring the existence of an effective cash management system to provide for the payment and investment of cash, transmitting timely and reliable cash flow forecasts and ensuring compliance with relevant statutory and regulatory requirements.

6. REPORTING ARRANGEMENTS

The Council will adopt the following reporting arrangements in accordance with the requirements of the Code:

Area of Responsibility	Council / Committee/ Officer	Frequency
Treasury Management Policy Statement	P&R Committee	Annually at the start of the financial year
Treasury Management Strategy / Annual Investment Strategy	P&R Committee	Annually at the start of the financial year
Treasury Management Strategy / Annual Investment Strategy – mid-year activity report	P&R Committee	Annually by December
Treasury Management Strategy / Annual Investment Strategy – updates or revisions at other times	P&R Committee	As required
Annual Treasury Outturn Report / Annual Investment Report	P&R Committee	Annually by 30 September after the end of each financial year
Prudential Indicators	P&R Committee	Quarterly as part of Capital Monitoring report.
Capital Strategy	P&R Committee	As required
Treasury Management Practices	Executive Director of Corporate Services	As required

7. TREASURY MANAGEMENT PRACTICES

Dundee City Council will follow the main principles as detailed for the treasury management practices listed below:

TMP 1 Risk Management

The Executive Director of Corporate Services 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 **TMP6 Reporting requirements and management information arrangements**. In respect of each of the following risks, the arrangements which seek to ensure compliance with these objectives are set out in separate working schedules maintained by the Executive Director of Corporate Services. In summary, the following types of risks are identified, more information can be found in detailed TMPs –

- Liquidity Risk Management
- Interest Rate Risk Management
- Exchange Rate Risk Management
- Inflation Risk Management
- Credit and Counterparty Risk Management
- Refinancing Risk Management
- Legal and Regulatory Risk Management
- Fraud, Error and Corruption and Contingency Management
- Market Risk Management
- Environmental, Social and Governance risk management

TMP 2 Performance Measurement

Dundee City Council is committed to the pursuit of best value in its treasury management activities and to the use of performance methodology in support of that aim, within the framework set out in its Treasury Management Policy Statement.

Accordingly, the treasury management function will be the subject of ongoing analysis of the value it adds in support of the organisation's stated business or service objectives. It will be the subject of regular examination of alternative methods of service delivery and of the scope for other potential improvements. The performance of the treasury management function will be measured using the criteria set out in separate working schedules maintained by the Executive Director of Corporate Services.

TMP 3 Decision-making and analysis

Dundee City Council will maintain full records of its treasury management decisions, and of the processes and practices applied in reaching those decisions, both for the purposes of learning from the past, and for demonstrating that reasonable steps were taken to ensure that all issues relevant to those decisions were taken into account at the time. The issues to be addressed and processed and practices to be pursued in reaching decisions are detailed in separate working schedules maintained by the Executive Director of Corporate Services.

TMP 4 Approved Instruments, Methods and Techniques

Dundee City Council will undertake its treasury management activities by employing only those instruments, methods and techniques detailed in separate working schedules maintained by the Executive Director of Corporate Services and within the limits and parameters defined in **TMP1, Risk Management**.

TMP 5 Organisation, Clarity and Segregation of Responsibilities and Dealing Arrangements

Dundee City Council considers it essential, for the purposes of the effective control and monitoring of its treasury management activities, for the reduction of the risk of fraud or error, and for the pursuit of optimum performance, that these activities are structured and managed in a fully integrated manner and that there is at all times a clarity of treasury management responsibilities.

The principles on which this will be based is a clear distinction between those charged with setting treasury management policies and those charged with implementing and controlling these policies, particularly with regard to the execution and transmission of funds, the recording and administering of treasury management decisions and the audit and review of the treasury management function.

If Dundee City Council requires to depart from these principles, the Executive Director of Corporate Services will ensure that the reasons are properly reported in accordance with **TMP6 Reporting requirements and management information arrangements** and the implications properly considered and evaluated.

The Executive Director of Corporate Services will ensure that there are clear written statements of the responsibilities for each post engaged in treasury management and the arrangement for absence cover. The present arrangements are detailed in separate working schedules maintained by the Executive Director of Corporate Services.

The Executive Director of Corporate Services will ensure there is proper documentation for all deals and transactions, and that procedures exist for the effective transmission of funds. The present arrangements are detailed in separate working schedules maintained by the Executive Director of Corporate Services.

The delegation to the Executive Director of Corporate Services in respect of treasury management is set out in the Introduction to the Treasury Policy Statement. The Executive Director of Corporate Services will fulfil all such responsibilities in accordance with the organisation's policy statement and TMP's and CIPFA's Standard of Professional Practice on treasury management.

TMP 6 Reporting Requirements and Management Information Arrangements

Dundee City Council will ensure that regular reports are prepared and considered on the implementation of its treasury management policies; on the effects of decisions taken and the transactions executed in pursuit of those policies; on the implications of changes, particularly budgetary, resulting from regulatory, economic, market or other factors affecting its treasury management activities; and on the performance of the treasury management function.

As a minimum, the Policy and Resources Committee will receive:

- an annual report on the strategy and plan to be pursued in the coming year
- an annual report on the performance of the treasury management function, on the effects of the decisions taken and the transactions executed in the past year, and on any circumstances of non-compliance with the organisation's Treasury Management Policy Statement and TMPs.

TMP 7 Budgeting, Accounting and Audit Arrangements

The Executive Director of Corporate Services will prepare, and the Council will approve and, if necessary, from time to time amend, an annual budget for treasury management, which will bring together all of the costs involved in running the treasury management function, together with associated income. The matter to be included in the budget will at minimum be those required by statute or regulation, together with such information as will demonstrate compliance with TMP1 Risk Management, **TMP2 Best Value and Performance Measurement** and **TMP4 Approved Instruments, Methods and Techniques**.

The Executive Director of Corporate Services will exercise effective controls over this budget and will report upon and recommend any changes required in accordance with TMP6 Reporting Requirements and Management Information Arrangements.

Dundee City Council will account for its treasury management activities, for decisions made and transactions executed, in accordance with appropriate accounting practices and standards, and with statutory regulatory requirements in force.

Dundee City Council will ensure that its auditors, and those charged with regulatory review, have access to all information and papers supporting the activities of the treasury management function as are necessary for the proper fulfilment of their roles, and that such information and papers demonstrate compliance with external and internal policies and approved practices.

TMP 8 Cash and Cash Flow Management

Unless statutory or regulatory requirements demand otherwise, all monies which belong to the Council will be under the control of the Executive Director of Corporate Services, and will be aggregated for cash flow and investment management purposes. Cash flow projections will be prepared on a regular

and timely basis, and the Executive Director of Corporate Services will ensure that these are adequate for the purposes of monitoring compliance with TMP1 (1) Liquidity Risk Management.

TMP 9 Money Laundering

Dundee City Council is alert to the possibility that it may become the subject of attempts to involve it in transactions involving the laundering of money. Accordingly, it will have a policy which is reviewed every three years (or earlier if regulations require), maintain procedures for verifying and recording the identity of counterparties and reporting suspicions, and will ensure that staff involved with these activities are properly trained, and adequate records are maintained. The Council recognises the importance of ensuring that all staff are aware of money laundering requirements and the risks it poses to the organisation and it will ensure that guidance is readily available and communicated across all areas within the Council.

TMP 10 Training and Qualifications

Dundee City Council recognises the importance of ensuring that all staff involved in the treasury management function are fully equipped to undertake the duties and responsibilities allocated to them. It will therefore seek to appoint individuals who are both capable and experienced and will provide training for staff to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills. The Council operates a Professional Development Review system which identifies the training requirements of individual members of staff engaged on treasury related activities.

The Council will ensure that Councillors are also provided with adequate training and guidance to enable them to undertake their duties in respect of treasury management. The Executive Director of Corporate Services will recommend and implement the necessary arrangements.

TMP 11 Use of External Service Providers

Dundee City Council recognises the potential value of employing external providers of Treasury Management Services, in order to acquire access to specialist skills and resources. Service providers will be subject to full evaluation in terms of costs and benefits. It will also 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. And it will ensure, where feasible and necessary, that a spread of service providers is used, to avoid over-reliance on one or a small number of companies. Where services are subject to formal tender or re-tender arrangements, legislative requirements will always be observed. The monitoring of such arrangements rests with the Executive Director of Corporate Services.

TMP 12 Corporate Governance

Dundee City Council is committed to the pursuit of proper corporate governance throughout its businesses and services, and to establishing the principles and practices by which this can be achieved. Accordingly, the treasury management function and its activities will be undertaken with openness and transparency, honesty, integrity and accountability.

This organisation has adopted and has implemented the key recommendations of the CIPFA Code. This, together with the other arrangements detailed in separate working schedules maintained by the Executive Director of Corporate Services are considered vital to the achievement of proper corporate governance in treasury management, and the Executive Director of Corporate Services will monitor and, if and when necessary, report upon the effectiveness of these arrangements.

The Executive Director of Corporate Services will maintain, separate from this document, schedules specifying the systems and routines to be employed and the records to be maintained to ensure adherence to these principles.

Appendix 1 Environmental, Social and Governance risk management

ESG is an area that CIPFA is still working on after the 2022 revised codes. In particular, work will be needed to coordinate the priority which needs to be given to issues of security, liquidity and yield (SLY) while also accommodating ESG principles as a fourth priority and principle to apply.

The assessment and implementation of ESG considerations are better developed in equity and bond markets than for short-term cash deposits, primarily due to the wider scope of potential investment opportunities. Furthermore, there is a diversity of market approaches to ESG classification, analysis

and integration. This means that a consistent and developed approach to ESG for public service organisations, focussed on more typical Treasury-type investments, is currently difficult to achieve. CIPFA, therefore, recommends authorities to consider their credit and counterparty policies in light of ESG information and develop their own ESG investment policies and treasury management practices consistent with their organisation's own relevant policies, such as environmental and climate change policies.

CIPFA does not expect that the organisation's ESG policy will currently include ESG scoring or other real-time ESG criteria at individual investment level.