

AWDURDOD TÂN AC ACHUB GOGLEDD CYMRU



NORTH WALES FIRE AND RESCUE AUTHORITY

The AUDIT COMMITTEE meeting will be held MONDAY 27 JANUARY 2020 at FIRE AND RESCUE HEADQUARTERS, ST ASAPH BUSINESS PARK at 10.00am.

Yours faithfully

Colin Everett
Clerk

AGENDA

1. Apologies

2. Declarations of Interests

3. Notice of Urgent Matters

Notice of items which, in the opinion of the Chairman, should be considered at the meeting as a matter of urgency pursuant to Section 100B (4) of the Local Government Act, 1972.

4. Minutes of the meeting held on 16 September 2019

5. Matters arising

6. Capital Strategy and Treasury Management

7. Internal Audit Strategy and Annual Plan 2020/21

8. Wales Audit Office Annual Audit Letter 2018/19

9. Urgent Matters

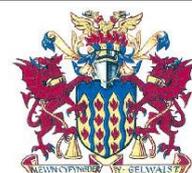
To consider any items which the Chair has decided are urgent (pursuant to Section 100B (4) of the Local Government Act, 1972) and of which substance has been declared under item 3 above.

PART II

It is recommended pursuant to Section 100A (4) of the Local Government Act, 1972 that the Press and Public be excluded from the meeting during consideration of the following item(s) of business because it is likely that there would be disclosed to them exempt information as defined in Paragraph(s) 12 to 18 of Part 4 of Schedule 12A of the Local Government Act 1972.

No items.

Report to	Audit Committee
Date	27 January 2020
Lead Officer	Ken Finch - Treasurer
Contact Officer	Ken Finch
Subject	Capital Strategy and Treasury Management



PURPOSE OF REPORT

- 1 The Capital Strategy gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of a Fire and Rescue Service along with an overview of how associated risk is managed and the implications for future financial sustainability. It summarises the overall processes and procedures that govern the purchase and financing of assets in order to enhance members' understanding of these sometimes technical areas. The report also includes the Prudential Indicators and Treasury Strategies that need approval by the Fire and Rescue Authority.

EXECUTIVE SUMMARY

- 2 The revenue and capital budgets for 2020/21 were approved by the Fire and Rescue Authority at its meeting of the 16 December 2019. Members approved a net revenue budget of £35.9m for 2020/21 with a further £4.1m approved for capital expenditure. The Capital Strategy has been prepared using the relevant data contained in the revenue and capital budgets approved by Members and from various policies and procedures that are in place to manage the purchase and financing of assets.
- 3 The Capital Strategy is outlined within appendix A with supporting appendices to provide the detailed information with regards the Prudential Indicators for 2020/21 to 2022/23 and the strategy to be followed regarding borrowing and investing the Authority's funds in the financial year 2020/21. The appendices set out:-
 - (i) overall Capital Strategy (Appendix A);
 - (ii) a list of prudential indicators as required by the CIPFA Prudential Code for Capital Finance in Local Authorities (Appendix B);
 - (iii) the Treasury Management Strategy outlining the strategy to be followed regarding short and long-term borrowing for 2020/21 in accordance with the CIPFA code of Practice on Treasury Management (Appendix C);
 - (iv) the strategy to be followed regarding the investment of Fire and Rescue Authority funds (Appendix D); and
 - (v) Minimum Revenue Provision Statement (Appendix E).

RECOMMENDATIONS

- 4 That Members recommend to the Fire and Rescue Authority that it approves each of the five key elements of the report as set out below:
- (i) The overall Capital Strategy in Appendix A;
 - (ii) The Prudential Indicators set out in Appendix B;
 - (iii) The Treasury Management Strategy for 2020/21 set out in Appendix C;
 - (iv) The Investment Strategy at Appendix D;
 - (v) The Minimum Provision Policy at Appendix E.

BACKGROUND

- 5 The Audit Committee has been tasked with ensuring effective scrutiny of the treasury management strategy and policies and based on its findings make recommendations to the Fire and Rescue Authority.

INFORMATION

- 6 The Committee should note that the strategies in the report have been prepared using guidance from the Treasury Management advisors, Arlingclose, used by Conwy County Borough Council who has the responsibility for the Fire Service Treasury function.

IMPLICATIONS

Wellbeing Objectives	This report links to NWFRA's long-term well-being objectives. Ensures that the purchase of assets to support front line service delivery is prudent, affordable and sustainable. Ensures there is sufficient investment in infrastructure to enable the service to provide emergency responses and prevention work well in to the future.
Budget	Budget is set annually for capital financing in line with the Treasury report.
Legal	The regulatory framework is set out in the appendices to the report.
Staffing	None
Equalities/Human Rights/Welsh Language	None
Risks	Investment of surplus funds – there is a risk that the financial institution in which the service's funds are invested could fail with a loss of part of the principal invested. However, one of the purposes of the report is to mitigate this risk.

1.0 CAPITAL STRATEGY

The aim of the strategy is to make it easier for Members to understand how Capital Expenditure and Capital Financing are linked and what policies and procedures are in place to govern the purchase and financing of assets.

1.1 Capital Expenditure and Financing

- 1.2 Capital expenditure is where the Authority spends money on assets, such as property or vehicles that will be used for more than one year. In a Fire and Rescue Authority this could include spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Authority has some limited discretion on what counts as capital expenditure, for example assets costing below £5,000 are not capitalised and are charged to revenue in year. This is a change to the policy whereby previously the capital limit was £1,000, it has been increased to ensure assets are managed more efficiently.
- 1.3 The details of the Authority's policy on capitalisation and the treatment of assets for accounting purposes is included as an appendix to the Statement of Accounts under 'Statement of Accounting Policies'. The accounts are published on the Fire Service website every year, www.nwales-fireservice.org.uk.

The capital expenditure budgets approved by Members are as follows:

	2018/19 Actual £'000	2019/20 Revised £'000	2020/21 Estimate £'000	2021/22 Estimate £'000	2022/23 Estimate £'000
Capital expenditure	1,856	1,498	4,089	3,685	2,985

- 1.4 A breakdown of the capital schemes approved by Members is contained in the Medium Term Financial Strategy report which is approved by the Fire and Rescue Authority in December every year. The report is available on the Fire and Rescue Service website as detailed above.
- 1.5 Service managers request funding for various capital schemes during the budget setting process. All requests are considered based on service needs and delivering the corporate priorities as set out in the Improvement and Well-being Plan.

- 1.6 Following approval of the capital programme all expenditure must be carried out in accordance with the Authority's Financial Regulations. Service managers must ensure that all expenditure meets the statutory definition of capital and comply with the Contract Procedure Rules. The delivery of the capital programme is monitored in line with the normal budget monitoring arrangements with action taken to address any variances from planned expenditure.
- 1.7 All capital expenditure must be financed, either from external sources (government grants and other contributions), the Authority's own resources (revenue, reserves and capital receipts) or debt (borrowing and leasing).
- 1.8 Debt is only a temporary source of finance, since loans and leases must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as minimum revenue provision (MRP). Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance.
- 1.9 The Authority's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt. The details of the changes to the CFR over the period are set out in Appendix B.
- 2.0 Asset disposals:** When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt.

3.0 Treasury Management

- 3.1 Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Authority's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Authority is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

- 3.2 **Borrowing strategy:** The Authority's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Authority therefore seeks to strike a balance between cheap short-term loans (currently available at around 0.75%) and long-term fixed rate loans where the future cost is known but higher (currently 2.0% to 3.0%). Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term.
- 3.3 **Affordable borrowing limit:** The Authority is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit.
- 3.4 **Investment strategy:** Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.
- 3.5 The Authority's policy on treasury investments is to prioritise security and liquidity over yield, which is to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. The Authority only holds investments for cash flow purposes.
- 3.6 **Overview of the Governance Arrangements:** Decisions on treasury management investment and borrowing are made daily and are delegated to Conwy County Borough Council as part of a Service Level Agreement where the Council manages the Treasury function on behalf of the Fire Service. Staff responsible for the day to day function must act in line with the treasury management strategy approved by the Fire and Rescue Authority on 15 December 2003. Reports on treasury management activity are presented to the Fire and Rescue Authority. The Audit Committee is responsible for scrutinising treasury management decisions.

4.0 Revenue Budget Implications

- 4.1 Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the overall budget for the Authority.

Prudential Indicator: Proportion of financing costs to net revenue stream

	2018/19 actual (£'000)	2019/20 forecast (£'000)	2020/21 budget (£'000)	2021/22 budget (£'000)	2022/23 budget (£'000)
Financing costs	2,140	2,824	2,836	3,201	3,425
Proportion of net revenue stream	6.39%	8.01%	7.89%	8.63%	8.99%

4.2 **Sustainability:** Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 50 years into the future. The Treasurer is satisfied that the proposed capital programme is prudent, affordable and sustainable due to the robust programme that the service has in place for replacing assets with approval only being given for any proposed expenditure after a cost benefit analysis has been undertaken.

4.3 Knowledge and Skills

4.4 The Authority employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. For example, the Treasurer is a qualified accountant with over 40 years' experience and both the Assistant Chief Officer and Head of Finance are qualified accountants. Staff at Conwy County Borough Council responsible for managing the Treasury Management activity are also well qualified and attend regular seminars provided by Arlinglose to ensure they are up to date with the latest developments

4.5 Where staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. Conwy currently employs Arlingclose Limited as treasury management advisers who offer advice on the Fire Service portfolio as part of the agreement. This approach is more cost effective than employing such staff directly, and ensures that the Authority has access to knowledge and skills commensurate with its risk appetite.

PRUDENTIAL INDICATORS AND CAPITAL INVESTMENT

1. INTRODUCTION

- 1.1 The Local Government Act 2003 requires the Authority to adopt the CIPFA Prudential Code and produce prudential indicators. Each indicator either summarises the expected capital activity or introduces limits upon that activity, and reflects the outcome of the Authority's capital appraisal systems. This report updates currently approved indicators and introduces new indicators for 2022/23. A revised code was issued in 2009 and this report complies with the requirements, which have asked that this report be subject to greater scrutiny by those charged with governance - for the Fire and Rescue Authority this is the Audit Committee.
- 1.2 The Capital Programme for 2020/21 was presented to the Fire and Rescue Authority on 16 December 2019, these indicators support that programme. The Authority has freedom over capital expenditure so long as it is prudent, affordable and sustainable. In order to show it is working within these limits the Audit Committee must approve, revise and monitor at least a basic range of Prudential Indicators for the forthcoming three years.

2.0 THE CAPITAL EXPENDITURE PLANS

- 2.1 The Authority's capital expenditure plans are summarised below and this forms the first of the prudential indicators to be approved by Members. All capital expenditure in the forward programme is currently unsupported and must be funded from the Authority's own resources.
- 2.2 However, the Government may decide to place limits on unsupported capital expenditure by introducing controls on all Local Authorities plans or, in the event of an assessment by Central Government that local plans are unaffordable at a specific Authority, it may implement a local control to limit its capital expenditure plans. No such controls were implemented during 2019/20, and it is unlikely that controls will be exercised for 2020/21.

	2018/19 Actual £'000	2019/20 Revised £'000	2020/21 Estimate £'000	2021/22 Estimate £'000	2022/23 Estimate £'000
Capital expenditure	1,856	1,498	4,089	3,685	2,985
Financed by:					
Capital receipts	-107	0	0	0	0
Capital grants	-144	0	0	0	0
Revenue	0	0	0	0	0
Net financing need for the year	1,605	1,498	4,089	3,685	2,985

3.0 The Authority's Borrowing Need (the Capital Financing Requirement)

3.1 The second prudential indicator is the Authority's Capital Financing Requirement (CFR). The CFR is simply the total outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Authority's underlying borrowing need. The capital expenditure within 2.2 which has not immediately been paid for will increase the CFR.

The Authority is required to pay off an element of the accumulated General Fund capital spend each year through a revenue charge (the Minimum Revenue Provision - MRP), although it is also allowed to undertake additional voluntary revenue provision (VRP).

Members are asked to approve the CFR projections as below:

	2018/19 Actual £'000	2019/20 Revised £'000	2020/21 Estimate £'000	2021/22 Estimate £'000	2022/23 Estimate £'000
Capital Financing Requirement					
Opening CFR	33,917	33,382	32,644	34,465	35,563
Closing CFR	33,382	32,644	34,465	35,563	35,781
Movement in CFR	-535	-738	1,821	1,098	218

Movement in CFR represented by					
Net financing need for the year (above)	1,605	1,498	4,089	3,685	2,985
Less MRP/VRP	-2,140	-2,236	-2,268	-2,586	-2,767
Movement in CFR	-535	-738	1,821	1,098	218

3.2 The expected impact of the capital expenditure decisions above on the Authority's debt and investment position are shown in the Treasury Strategy.

4.0 AFFORDABILITY PRUDENTIAL INDICATORS

4.1 The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Authority's overall finances. Members are asked to approve the following indicators:

4.2 **Actual and Estimates of the ratio of financing costs to net revenue stream**
This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs) against the net revenue stream. The estimates of financing costs include current commitments and the Capital Programme approved by members in December 2019.

	2018/19 Actual %	2019/20 Revised %	2020/21 Estimate %	2021/22 Estimate %	2022/23 Estimate %
Ratio	6.39	8.01	7.89	8.63	8.99

TREASURY MANAGEMENT STRATEGY FOR 2020/21 -2022/23**1.0 Introduction**

- 1.1 The treasury management service is an important part of the overall financial management of the Authority's affairs. The prudential indicators in Appendix B consider the affordability and impact of capital expenditure decisions, and set out the Authority's overall capital framework. The treasury strategy considers the effective funding of these decisions. Together they form part of the process which ensures the Authority meets balanced budget requirement under the Local Government Finance Act 1992. There are specific treasury prudential indicators included in this strategy which require approval.
- 1.2 The Authority's treasury activities are strictly regulated by statutory requirements and a professional code of practice (the CIPFA Code of Practice on Treasury Management). The Authority adopted the CIPFA Code of Practice on Treasury Management and a Treasury Management Policy Statement on 15 December 2003. This adoption meets the requirements of the first of the Treasury Prudential Indicators. A revised policy was issued in 2010 which was approved by Members and this report is based on the new policy. CIPFA consulted on changes to the Code in 2017 which have resulted in changes to the reporting format so Members are presented with a Capital Strategy report in addition to the other Treasury information.
- 1.3 The Code requires an annual strategy to be reported to the Authority outlining the expected treasury activity for the forthcoming 3 years. A further mid-year monitoring report is produced and after the year-end a report on actual activity for the year.
- 1.4 A key requirement of this report is to explain both the risks, and the management of the risks, associated with the treasury service. The strategy report will cover several areas as follows:
 - (i) The Authority's debt and investment projections;
 - (ii) The Authority's estimates and limits on future debt levels;
 - (iii) The expected movement in interest rates;
 - (iii) The Authority's borrowing strategy;
 - (iv) The Authority's investment, counterparty and liquidity framework;
 - (vi) Treasury performance indicators.

2.0 DEBT AND INVESTMENT PROJECTIONS 2019/20 – 2021/22

2.1 The current position as at 19 December 2019 is as follows:

Public Works Loan Board (PWLB)	- £15,904,732	Fixed Rate
Other Local Authorities	- £17,000,000	Fixed Rate

Investments - £4,335,000

2.2 The borrowing requirement comprises the expected movement in the CFR and any maturing debt which will need to be re-financed. The table below shows this effect on the treasury position over the next three years. It also highlights the expected change in investment balances.

	2019/20 Revised £'000	2020/21 Estimated £'000	2021/22 Estimated £'000	2022/23 Estimated £'000
External Debt				
Debt at 1 April	33,382	32,644	34,465	35,563
New loans to meet CFR	0	1,821	1,098	218
Maturing Debt	-25,000	-25,000	-25,000	-25,000
Maturing Debt Replacement	24,262	25,000	25,000	25,000
Adjustment for prior years over borrowing	0	0	0	0
Debt at 31 March	32,644	34,465	35,563	35,781
Annual change in debt	-738	1,821	1,098	218
Investments				
Total Investments at 31 March	1,000	1,000	1,000	1,000
Investment change	0	0	0	0

3.0 LIMITS TO BORROWING ACTIVITY

3.1 Within the prudential indicators there are a number of key indicators to ensure the Authority operates its activities within well-defined limits.

3.2 For the first of these the Authority needs to ensure that its total borrowing does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2019/20 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.

	2019/20 Revised £'000	2020/21 Estimate £'000	2021/22 Estimate £'000	2022/23 Estimate £'000
Debt at 1 April	33,382	32,644	34,465	35,563
Expected Change in Debt	-738	1,821	1,098	218
Other Long Term Liabilities	0	0	0	0
Gross Debt at 31 March	32,644	34,465	35,563	35,781
CFR	32,644	34,465	35,563	35,781

3.3 The Treasurer reports that the Authority complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in the budget report. Changes to the International Financial Reporting Standards (IFRS) 16 will mean that assets currently classed as operational leases and paid directly via revenue expenditure will be treated as financial leases in the future. The Fire and Rescue Authority is currently gathering information relating to these assets which will enable the authority to conform to the new standard.

3.4 **The Authorised Limit** – this represents a limit beyond which external debt is prohibited, and this limit needs to be set or revised by the Fire and Rescue Authority. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003.

3.5 **The Operational Boundary** – this indicator is based on the probable external debt during the course of the year; it is not a limit. Actual external debt could vary around this boundary for short times during the year. It should act as a monitoring indicator to ensure the authorised limit is not breached.

3.6 Members are asked to approve the following authorised limit and operational boundary:

	2019/20 Revised £'000	2020/21 Estimate £'000	2021/22 Estimate £'000	2022/23 Estimate £'000
Authorised Limit	34,644	36,465	37,563	37,781
Operational Boundary	32,644	34,465	35,563	35,781

4.0 ECONOMIC BACKGROUND AND EXPECTED MOVEMENT IN INTEREST RATES

- 4.1 The major external influence on the Authority's treasury management strategy for 2020/21 will be dependent on the deal negotiated as part of the UK's exit from the European Union and the trading arrangements agreed. The domestic economy has remained relatively robust since the surprise outcome of the 2016 referendum, but there are indications that uncertainty over the future is now weighing on growth. Transitional arrangements may prevent a cliff-edge, but will also extend the period of uncertainty for several years. Economic growth is therefore forecast to remain sluggish throughout 2019/20.

The UK's progress negotiating its exit from the European Union, together with its future trading arrangements, will continue to be a major influence on the Authority's treasury management strategy for 2020/21. The Bank of England maintained Bank Rate to 0.75% in November following a 7-2 vote by the Monetary Policy Committee. Despite keeping rates on hold, MPC members did confirm that if Brexit uncertainty drags on or global growth fails to recover, they are prepared to cut interest rates as required. Moreover, the downward revisions to some of the growth projections in the Monetary Policy Report suggest the Committee may now be less convinced of the need to increase rates even if there is a Brexit deal.

Growth in Europe remains soft, driven by a weakening German economy which saw GDP fall -0.1% in Q2 and is expected to slip into a technical recession in Q3.

- 4.2 Bail-in legislation, which ensures that large investors including local authorities will rescue failing banks instead of taxpayers in the future, has now been fully implemented in the European Union, Switzerland and USA. In addition, the largest UK banks have ring fenced their retail banking functions into separate legal entities during 2018. There remains some uncertainty over how these changes will impact upon the credit strength of the residual legal entities.
- 4.3 The Authority's treasury management adviser Arlingclose is forecasting that Bank Rate will remain at 0.75% until the end of 2022. The Bank of England, having previously indicated interest rates may need to rise if a Brexit agreement was reached, stated in its November Monetary Policy Report and its Bank Rate decision (7-2 vote to hold rates) that the MPC now believe this is less likely even in the event of a deal.

Gilt yields have risen but remain at low levels and only some very modest upward movement from current levels are expected based on Arlingclose's interest rate projections. The central case is for 10-year and 20-year gilt yields to rise to around 1.00% and 1.40% respectively over the time horizon, with broadly balanced risks to both the upside and downside. However, short-term volatility arising from both economic and political events over the period is a near certainty.

5.0 BORROWING STRATEGY 2020/21

- 5.1 The Treasurer, under delegated powers, will take the most appropriate form of borrowing depending on the prevailing interest rates at the time, taking into account any risks. Shorter term fixed rates may provide lower cost opportunities in the short/medium term. The cost of new borrowing at a slightly higher rate has been factored in to the budget for 2020/21.
- 5.2 The PWLB has structured its lending arrangements such that debt restructuring is difficult however with the likelihood of long term rates increasing any possible debt restructuring is likely to focus on switching from longer term fixed rates to cheaper shorter term debt, although the Treasurer and treasury consultants will monitor prevailing rates for any opportunities during the year.
- 5.3 The option of postponing borrowing and running down investment balances is currently being utilised. This reduces counterparty risk and hedges against the expected fall in investments returns.

6.0 INVESTMENT, COUNTERPARTY AND LIQUIDITY FRAMEWORK

- 6.1 Regulatory changes in the banking sector increases the risks associated with treasury activity. These changes, as previously reported to Members have been fully implemented. In light of the changes it is important that the portfolio of investments is diverse so as to spread the risk. Given the risks it would be prudent to use reserves and balances to temporarily fund loan debt so cash investments are kept to the minimum. It is not possible to entirely move away from investing as cash deposits to banks and building societies as some degree of liquidity is needed for cash flow purposes. It is prudent therefore to place any cash deposits short term and look at other vehicles for investing the Authority's surplus cash.

6.2 The Treasurer will maintain a counterparty list i.e. all the financial institutions which the service can utilise for investing funds, in compliance with the following criteria:-

Banks £5m limit

All UK banks and their subsidiaries that have good ratings (Fitch or equivalent). This is currently defined as

long term

BBB

Central Government - Unlimited

Debt management Office

Money Market Funds (MMF)

It is recommended that all MMFs are approved for general use, with a limit of £1 million per fund. It is anticipated that these funds will be utilised on the recommendation of our Treasury Advisors Arlingclose. The Welsh Government have now enacted new legislation with regards MMF's and the recognition of such on the balance sheet at year end as investments rather than capital expenditure.

Local Authorities £2m limit

All except those subject to limitation of council tax and precepts under Part 1 of the Local Government Finance Act 1992.

Building Societies £2m limit

Building societies with a rating (as for the banking sector).

Building Societies (Assets £1bn) £2m / 9 months limit

Building societies without a rating but with assets of £1 billion or more.

6.3 The criteria set out above for choosing counterparties provide a sound approach to investment and are designed to reduce the financial risks to the Authority of investing money on the money market. However, the criteria listed above is for general guidance, other factors are considered as to whether a counterparty is removed from the list for example a 'Negative Watch' or changes to an institutions balance sheet leverage. The Institutions on the Counterparty list are monitored closely by the Treasury Consultants and treasury staff will adjust activities at short notice to protect the Authority's position. The controls detailed in the framework are subject to change according to the market conditions. Current practice is to maintain investments for cash flow purposes only and use any surplus funds to replace borrowing.

7.0 TREASURY PERFORMANCE INDICATORS

7.1 There are three treasury prudential indicators the purpose of which is to contain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of an adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs.

7.2 It is recommended that the Authority sets upper and lower limits for the maturity structure of its fixed rate borrowings as follows:

	Upper Limit	Lower Limit
Under 12 Months	55%	0%
12 Months and within 24 Months	45%	0%
24 Months and within 5yrs	45%	0%
5 yrs and within 10 yrs	75%	0%
10 yrs and above	100%	0%

The upper limit for the short term borrowing position, under 12 months, remains at 55% to enable the Authority to take advantage of the low short term interest rates. The percentage of loans maturing in under 12 months is currently 52% due to the holding of £17m of short term loans with other Local Authorities. Any new borrowing will be in line with the limits set as above.

7.3 It is recommended that the Authority approve the following limits on Fixed and Variable interest rates.

	% Borrowing
Fixed Interest Rate	55 – 100
Variable Interest Rate	0 – 35

INVESTMENT STRATEGY

1.0 CURRENT OUTLOOK

- 1.1 **Key Objectives** - The Authority's investment strategy primary objectives are safeguarding the re-payment of the principal and interest of its investments on time first and ensuring adequate liquidity second – the investment return being a third objective.
- 1.2 Expectations on shorter-term interest rates, on which investment decisions are based, show a likelihood of the current 0.75% base rate remaining for the foreseeable future. The Authority's investment decisions are based on comparisons between the rises priced into market rates against the Authority's and advisers own forecasts.
- 1.3 There is a clear operational difficulty arising from the current market conditions. Ideally investments would be invested longer to secure better returns, however uncertainty over counterparties and the regulatory changes suggests shorter dates would provide better security and surplus funds be used as a substitute for borrowing.
- 1.4 The money available for investments is currently around £4.3m. The funds are used solely for cash flow purposes with any excess funds arising from reserves being used as a substitute for borrowing. At this time it is not foreseen that longer term investments will be made.

2.0 NATIONAL ASSEMBLY FOR WALES INVESTMENT GUIDANCE

- 2.1 The National Assembly for Wales issued Investment Guidance in March 2004, and this forms the structure of the Authority's policy below.
- 2.2 The key intention of the Guidance is to maintain the current requirement for Authorities to invest prudently, and that priority is given to security and liquidity before yield. In order to facilitate this objective, the guidance requires this Authority to have regard to the CIPFA publication "Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes". This Council adopted the Code on 15 December 2003 and will apply its principles to all investment activity. In accordance with the Code the Treasurer has produced its treasury management practices, TMP 1(5), covering investment counterparty policy which requires approval each year.

2.3 Annual Investment Strategy - Approved Instruments

The key requirements of both the Code and the investment guidance are to set an annual investment strategy, as part of its annual treasury strategy for the following year, covering the identification and approval of following:

- (i) The strategy guidelines for decision making on investments, particularly non-specified investments.
- (ii) The principles to be used to determine the maximum periods for which funds can be committed.
- (iii) Specified investments the Authority will use. These are high security and high liquidity investments in sterling and with a maturity of no more than a year.
- (iv) Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

2.4 The investment policy proposed for the Authority is:

- (i) Strategy Guidelines –
The main strategy guidelines are outlined above with the emphasis on security and liquidity.
- (ii) Investment Periods –
The Authority's policy is to lend funds for a maximum of 364 days.
- (iii) Specified Investments –
These investments are sterling investments of not more than one-year maturity. These are low risk assets where the possibility of loss of principal or investment income is small. These would include investments with:
 - The Treasury Debt Management Office
 - Other Local Authorities (except rate capped)
 - All UK Banks and Building Societies with a high credit rating
- (iv) Non-Specified Investments –
Non-specified investments are any other type of investment (i.e. not defined as Specified above). This includes Building Societies with no rating and lending for more than 364 days. The limit for "non-specified" investments had been set at £3m.

Minimum Revenue Provision Statement

Background

- 1.0 The Capital Financing Requirement (CFR) is simply the total outstanding capital expenditure which has not yet been paid for from either revenue or capital resources and is essentially a measure of the Authority's underlying borrowing need. The Authority is required to pay off an element of the accumulated capital spend each year through a charge to the revenue account (the MRP) although it is also allowed to undertake additional voluntary payments.
- 2.0 Regulations have been issued which require the Fire and Rescue Authority to approve an MRP statement in advance of each year.

3.0 **MRP Policy**

Members approve the following MRP policy:

For capital expenditure incurred before 1 April 2019 and any subsequent expenditure the MRP policy will be to repay

- the capital expenditure incurred on Land & Buildings using the Asset Life Method-straight line (excluding the Wrexham Fire Station new build).
- and for Vehicles, Plant, Equipment and Infrastructure the MRP will be based on the estimated life of the assets.
- the expenditure incurred on the new Wrexham Fire station be re-paid over the life of the lease held with the Wales Ambulance Service Trust (50 years)

- 4.0 The above policy is in line with the Regulations and includes a change to the policy with regards the method used for expenditure incurred on Land & Buildings. The budget for 2020/21 approved by Members in December 2019 was set using the above methodology.

Report to	Audit Committee
Date	27 January 2020
Lead Officer	Mike Halstead, Head of Audit and Procurement Services
Contact Officer	Keith V Williams, Audit, Conwy CBC
Subject	Internal Audit Strategy and Annual Plan 2020/21



PURPOSE OF REPORT

- 1 The Internal Audit Strategy and Annual Plan 2020/21 is submitted to the Audit Committee for consideration and approval, in compliance with the Public Sector Internal Audit Standards.

EXECUTIVE SUMMARY

- 2 The overall strategy of Internal Audit is to deliver a risk based audit plan in a professional, independent manner, in compliance with the Public Sector Internal Audit Standards. The Strategy identifies how the Internal Audit Service will assist the Authority to accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. The Strategy and Annual Plan is submitted for approval on an annual basis.

RECOMMENDATIONS

- 3 That Members consider and approve the Internal Audit Strategy and Annual Plan 2020/21.

BACKGROUND

- 4 The requirement for an Internal Audit function for local authorities is implied by section 151 of the Local Government Act 1972, which requires that authorities "make arrangements for the proper administration of their financial affairs". The Accounts and Audit Regulations (Wales) 2014 places a statutory obligation on the Authority to "maintain an adequate and effective system of internal audit of its accounting records and of its system of internal control".
- 5 The Internal Audit Service's terms of reference are documented in the Service Level Agreement for the provision of financial services with Conwy County Borough Council for the period to 31st March 2021.

INFORMATION

STRATEGY STATEMENT

- 6 The overall strategy of Internal Audit is to deliver a risk based audit plan in a professional, independent manner, in compliance with the Public Sector Internal Audit Standards 2013; Internal Audit provides the organisation with objective assurance and undertakes consulting activities designed to add value and improve the Authority's operations. The Internal Audit Service will assist the Authority to accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.

DEFINITION AND OBJECTIVE

- 7 In compliance with the Public Sector Internal Audit Standards, the Head of Internal Audit is required to develop and maintain a strategy for delivering the Internal Audit service. Internal Audit is an assurance function that primarily provides an independent and objective opinion to the organisation on the control environment comprising risk management, control and governance by evaluating its effectiveness in achieving the organisation's objectives. It objectively examines, evaluates and reports on the adequacy of the control environment as a contribution to the proper, economic, efficient and effective use of resources. The control environment includes all authority operations, resources, services, and its responsibilities to other bodies.
- 8 The Accounts and Audit Regulations require the NWFRA to produce an Annual Governance Statement each year. The Head of Audit provides an annual report to those charged with governance to support the production of the Annual Governance Statement. This formal report includes an opinion on the overall adequacy and effectiveness of the risk management systems and the internal control environment; disclosure of any qualifications to that opinion together with reasons; a summary of the of the audit work upon which the opinion is based; the extent to which reliance upon the work of other assurance bodies has been placed; and any issues considered relevant to the preparation of the Annual Governance Statement.
- 9 Internal Audit operates in a consultancy role in advising managers in relation to issues within its remit, such as the implementation of appropriate controls in terms of new projects, developments and systems. The exact allocation of resources in respect of consultancy work is determined in the audit plan. Separate time allocations are allowed for consultancy activities, fraud related work and follow up audits.

STATUS

- 10 Internal Audit is responsible to the Treasurer for line management purposes, and helps to discharge the statutory functions of the Chief Finance Officer as defined in Section 151 of the Local Government Act 1972. However Internal Audit is independent in its planning and operation.
- 11 The Head of Audit Services has direct access to the Chief Fire Officer, all levels of management and elected members. Internal Auditors have the authority to:
- Enter at all reasonable times any authority establishment.
 - Have access to all records, documents, information and correspondence relating to any financial and other transaction as considered necessary, for the purposes of audit review and/or investigations.
 - Evaluate the adequacy and effectiveness of internal controls designed to secure assets and data to assist management in preventing and deterring fraud.
 - Request explanations as considered necessary to satisfy themselves as to the correctness of any matter under examination.
 - Require any employee of the NWFRA to produce cash, materials or any other property belonging to the authority in their possession or under their control.
 - Access records belonging to third parties, such as contractors or partners, when required and appropriate.

DELIVERY OF THE AUDIT SERVICE

- 12 The Head of Audit Services is responsible for delivering the audit service in accordance with the Service Level Agreement. To ensure that this can be achieved, there are appropriate arrangements for:
- Determining and planning the work to be carried out based upon a Needs Assessment and a risk based planning process, an annual operational audit plan and monthly work plans. All plans are based on an assessment of risk.
 - Providing the resources required to deliver the audit plan, the necessary skills (both in general audit and technical areas) and support facilities, such as IT facilities, equipment and management and administration processes.

INTERNAL AUDIT PLAN 2020/21

- 13 The Draft Annual Plan for 2020/21 is attached at **Appendix A**. The purpose of the annual audit plan is to:-
- Establish audit priorities in conjunction with Fire and Rescue Authority Management based upon a risk based approach of determining the audit needs of the Authority at the start of each year.
 - Determine the resources needed to carry out the required audit duties.
 - Review and follow up the audit work of the previous year.
- 14 The audit plan is designed to act as a guide only. Changes in circumstances or other emerging risks may result in deviations from the plan. The plan for 2020/21 has been prepared following consultation with Fire and Rescue Authority Management. The plan also includes time to follow up recommendations from previous audits.
- 15 The Internal Audit service will be delivered on the basis of a Needs Assessment, a risk based approach to determining the needs of the Authority at the start of each year and detailed operational plans which will be presented to the Audit Committee on an annual basis for approval. The assessment sets out the number of days required for Internal Audit to adequately review the areas involved, and a risk assessment level for each planned audit assignment. The over-riding objective of this approach is to ensure that Internal Audit is able to present an opinion on the control environment by directing adequate resources based on the relative risks of the operations, resources and services involved, using a formal risk assessment process. The risk assessment process takes account of a range of strategic, corporate, service and operational risks, including those identified through the Risk Management process and by the external auditor and the views of senior management on these issues. Where resources available are not considered by the Head of Audit Services to be adequate for such an opinion to be provided, this will be reported to the organisation through the Audit Committee.
- 16 The Plan balances the following requirements:
- the need to ensure the Audit Plan is completed to the target levels established by the section's performance indicators;
 - the need to ensure core financial systems are adequately reviewed to provide assurance that management has in place proper arrangements for financial control on which External Audit will place reliance;
 - the need to appropriately review other strategic and operational arrangements;

- the need to have uncommitted time available to deal with unplanned issues which may need to be reviewed or investigated;
 - the relative allocation of resources between assurance, fraud related and consultancy services provided by internal audit.
- 17 Progress against the operational plan and the content of the plan, will be kept under review by the Head of Audit Services in liaison with the Treasurer and through monitoring corporate and service developments. The Audit Committee will be advised of performance against the operational plan.
- 18 Internal Audit will comply with the Public Sector Internal Audit Standards (PSIAS). The Head of Audit Services will ensure that there is an up to date Audit Manual in place setting out expected standards for the service and will monitor compliance with these standards, including in relation to the planning, conduct and reporting of audit assignments.
- 19 An external assessment of Internal Audit's conformance against the PSIAS was undertaken on 31st October 2016 by Wrexham County Borough Council. The external assessors' overall opinion was that the Internal Audit Service generally conforms with the PSIAS and Code of Ethics in all significant areas and that it operates independently and objectively.
- 20 Conwy County Borough Council has established a Performance and Development Review Policy, which identifies the training, and development needs of its employees. The Internal Audit Section relies heavily upon the effectiveness of its staff to deliver high quality services. The aim of the PDR process is to reinforce and strengthen the relationship between individual performances, expectations of management, and organisational goals. In addition, the PSIAS (1230) requires the Head of Audit and Procurement Services to ensure that the Internal Audit Section has access to the full range of knowledge, skills, qualifications and experience to meet the Section's objectives and standards.
- 21 Internal Audit will aim to co-operate effectively with the external auditor and ensure that appropriate reliance can be placed on Internal Audit's activities.
- 22 The reporting approach for Internal Audit is set out in the approved Service Level Agreement and Internal Audit will comply with this approach as the most efficient method of delivering the outcomes of its work.

- 23 In the delivery of each assignment Internal Audit will look to make practical recommendations based on the findings of the work and discuss these with management, such that management commit to an appropriate action plan for implementing any necessary improvements to the control environment.

IMPLICATIONS

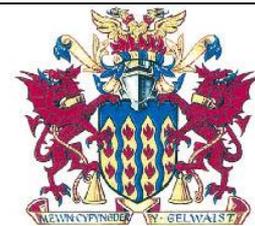
Wellbeing Objectives	Taken into consideration and incorporated within the Strategy.
Budget	No additional cost pressures; budget set for 2020/21 incorporates the SLA with CCBC for the provision of financial services.
Legal	Compliance with Section 151 of the Local Government Act 1972 and the Accounts and Audit Regulations 2015.
Staffing	No implications; Internal Audit Strategy implemented by Conwy Internal Audit staff.
Equalities/Human Rights/ Welsh Language	Conwy Internal Audit Services operates in accordance with legislation.
Risks	Failure to produce a strategy and appropriately plan the work of the Internal Audit Service would result in an undisciplined approach to evaluating and improving the effectiveness of risk management, control and governance processes and negatively impact on improvement of the Authority's operations. This would weaken the governance framework and could lead to the Authority receiving an adverse opinion on its arrangements for an effective Internal Audit Service, as required under relevant legislation.

**North Wales Fire and Rescue Authority
Draft Internal Audit Annual Plan 2020/21**

APPENDIX A

Ref	Audit Review	Comments	Days	Planned Timing
Risk Area – Operational Service Delivery				
8	Community Fire Safety – Home Fire Safety Checks	To review the procedures operating with regard to Community Safety - Home Fire Safety Checks, particularly in respect of partnership working and the referral and delivery of checks to 'vulnerable' members of the community.	12	
Risk Area – Financial and Fraud Risks				
17	HR and Payroll – Starters and Leavers	The objectives are to appraise the adequacy of the HR and payroll procedures in respect of employee starters and leavers, with a view to identifying any internal control weaknesses and areas of potential risk within the system.	12	
24	Central Stores	A review of the Central Stores procedures in respect of purchasing, receipts, issues, stocks, adjustments and security.	13	
Other Audit Work				
-	Audit Planning, Annual Report and Management	Provision for time required for management element of contract.	6	Ongoing
-	Follow up of Previous Recommendations	Following up recommendations made in 2019/20 – <ul style="list-style-type: none"> • Payroll System • Fleet Management 	5	Ongoing
-	Contingency Reserve	For unplanned work identified during the year and liaison/advice as required.	2	
Total Days Required for Audit Work			50	
Total Days Allocated 2020/21			50	
Totals Days b/f from 2019/20			-	
Total Days Available 2020/21			50	

Report to	Audit Committee
Date	27 January 2020
Lead Officer	Ken Finch, Treasurer
Contact Officer	Ken Finch, 01745 535286
Subject	Wales Audit Office Annual Audit Letter 2018/19



PURPOSE OF REPORT

- 1 To bring to the Audit Committee the Wales Audit Office's annual audit letter for noting.

EXECUTIVE SUMMARY

- 2 The 2018/19 annual audit letter summarises the key messages arising from the Auditor General for Wales' statutory responsibilities under the Public Audit (Wales) Act 2004 and his reporting responsibilities under the Code of Audit Practice in respect of that year.

RECOMMENDATIONS

- 3 Members are requested to note the content of the 2018/19 Annual Audit Letter

BACKGROUND

- 4 The Auditor General for Wales is the statutory auditor for the North Wales Fire and Rescue Authority

INFORMATION

- 5 The Auditor General is required to summarise the key messages from his work during the year. The Annual Audit Letter also includes his conclusion on the Authority's arrangements to secure economy, efficiency and effectiveness.

IMPLICATIONS

Wellbeing Objectives	This report links to NWFRA's long-term well-being objectives. It reports on the work of the service in the year and includes an assessment of the future plans for the service with regards funding and future risks which may impact on service delivery.
Budget	This report looks at the Authority's financial arrangements with regards operating within the budget set.
Legal	The report is a statutory requirement as detailed above.
Staffing	None
Equalities/Human Rights/ Welsh Language	None
Risks	Key messages may conclude that there are improvements needed that need to be actioned.



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Councillor Peter Lewis (Chairman)
North Wales Fire and Rescue Authority
Ffordd Salisbury
St Asaph business park
St Asaph
Denbighshire
LL17 OJJ

Reference: 1562A2019-20

Date issued: 1 November 2019

Dear Councillor Lewis

Annual Audit Letter – North Wales Fire and Rescue Authority 2018-19

This letter summarises the key messages arising from my statutory responsibilities under the Public Audit (Wales) Act 2004 and my reporting responsibilities under the Code of Audit Practice.

The Authority complied with its responsibilities relating to financial reporting and use of resources

It is the Authority's responsibility to:

- put systems of internal control in place to ensure the regularity and lawfulness of transactions and to ensure that its assets are secure;
- maintain proper accounting records;
- prepare a Statement of Accounts in accordance with relevant requirements; and
- establish and keep under review appropriate arrangements to secure economy, efficiency and effectiveness in its use of resources.

The Public Audit (Wales) Act 2004 requires me to:

- provide an audit opinion on the accounting statements;
- review the Authority's arrangements to secure economy, efficiency and effectiveness in its use of resources; and
- issue a certificate confirming that I have completed the audit of the accounts.

Fire authorities in Wales prepare their accounting statements in accordance with the requirements of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom. This Code is based on International Financial Reporting Standards.

On 29 July 2019 I issued an unqualified audit opinion on the accounting statements confirming that they present a true and fair view of the Authority's financial position and transactions. My report is contained within the Statement of Accounts. The key matters arising from the accounts audit were reported to members of the Audit Committee in my *Audit of Financial Statements report* on 29 July 2019 and subsequently to the Fire Authority at its meeting later that same day.

I am satisfied that the Authority has appropriate arrangements in place to secure economy, efficiency and effectiveness in its use of resources

My consideration of the Authority's arrangements to secure economy, efficiency and effectiveness has been based on the audit work undertaken on the accounts as well as placing reliance on the work completed under the Local Government (Wales) Measure 2009 and under the Well-being of Future Generations (Wales) Act 2015.

I am satisfied that the Authority has appropriate arrangements in place to secure economy, efficiency and effectiveness in its use of resources, although in June 2019 I set out in my Annual Improvement Report¹ some areas where improvements could be made.

I issued a certificate confirming that the audit of the accounts has been completed on 29 July 2019

Having given an audit opinion on the financial statements and concluded on the Authority's arrangements to secure economy, efficiency and effectiveness in its use of resources, I was able to certify that the audit was complete when I issued my audit opinion.

Financial audit fee

The financial audit fee for 2018-19 is currently expected to be in line with the agreed fee set out in the Annual Audit Plan.

¹ http://www.audit.wales/system/files/publications/1297A2019-20_NWFRA_AIR_2018-19_Eng_0.pdf

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Derwyn Owen', enclosed in a thin black rectangular border.

Derwyn Owen

For and on behalf of the Auditor General for Wales

cc Simon Smith, Chief Fire Officer
Ken Finch, Section 151 Officer
Helen MacArthur, Assistant Chief Officer