COMMITTEE:	DATE: 18 September 2013	CLASSIFICATION: Unrestricted	REPORT NO.	AGENDA NO.
	·			
REPORT OF:		TITLE:		
Corporate Director of Resources		2012-13 Treasury Management Outturn Report		
ORIGINATING OFFICER(S):				
Paul Thorogood, Service Head, Financial & HR Development		Ward(s) affected: N/A		
Oladapo Shonola Strategy Officer				

Lead Member	Cllr Alibor Choudhury - Resources
Community Plan Theme	All
Strategic Priority	One Tower Hamlets

1. **SUMMARY**

- 1.1 This report advises Full Council of treasury management activity for the financial year ended 31 March 2013 as required by the Local Government Act 2003.
- 1.2 The report details the treasury management outturn position based on the credit criteria adopted by the Corporate Director of Resources, the investment strategy for the financial year as approved by Council and the investment returns.
- 1.3 The Council complied with its legislative and regulatory requirements. The key actual prudential and treasury management indicators detailing the impact of capital expenditure activities during the year, with comparators are also addressed in this report.
- 1.4 The Acting Corporate Director, Resources confirms that borrowing was only undertaken for a capital purpose and the statutory borrowing limit (the authorised limit) was not breached.
- 1.5 The Local Government Act 2003 also requires that a sub-committee scrutinises the investment strategy, mid-year and outturn treasury management reports before they are reported to the full Council. As well as the above reports being reported to either Cabinet or the Audit Committee, updates on treasury management activities were also reported to the Audit Committee on 4 separate occasions.

2. <u>DECISIONS REQUIRED</u>

2.1 Members are recommended to Note the contents of this report.

3. REASONS FOR DECISIONS

3.1 This Council is required by Regulations issued under the Local Government Act 2003 to produce an annual treasury report reviewing treasury management activities and the actual prudential and treasury indicators for 2012/13. This report meets the requirements of both the CIPFA Code of Practice on Treasury Management (the Code) and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code).

- 3.2 The minimum reporting requirements stipulated by the Code are that Full Council should receive the following reports:
 - an annual treasury strategy in advance of the year (22 February 2012)
 - a mid-year treasury update report (Council 23 January 2013)
 - an annual report following the year describing the activity compared to the strategy (this report)
- In addition, the Audit Committee received treasury management activity update reports on 26 June 2012, 25 September 2012, 12 December 2012 and 26 March 2013.
- 3.4 The Code requires Members to review and scrutinise treasury management policy and activities. This report is important in that respect, as it provides details of the outturn position for treasury activities and highlights compliance with the Council's policies previously approved by Members.
- 3.5 The annual report on treasury management should assist Members in scrutinising officer decisions and checking that the investment strategy was implemented as approved by Full Council.

4 ALTERNATIVE OPTIONS

- 4.1 The Council is bound by legislation to have regard to the Treasury Management (TM) Code. The Code requires that the Council should receive an annual report on treasury management activities.
- 4.2 If the Council were to deviate from those requirements, there would need to be some good reason for doing so. It is not considered that there is any such reason, having regard to the need to ensure that Members are kept informed about treasury management activities and to ensure that these activities are in line with the investment strategy approved by the Council.

5 BACKGROUND

- 5.1 The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 require local authorities to have regard to the Treasury Management Code. The Treasury Management code requires that the Council or a sub-committee of the Council should receive an annual report on treasury management activities.
- 5.2 The Council approved the Treasury Management Strategy Statement on 22 February 2012, which included the Investment Strategy, Minimum Revenue Provision and prudential indicators for 2012/13. These reports set out the parameters within which Treasury Management officers should operate when executing their roles. In line with the requirement of the Code, this report should assist Members in discharging their responsibilities relating to the review and scrutiny of Treasury Management policies and activities in 2012/13.

5.3 This report summarises:

- Capital activity during the year;
- Impact of this activity on the Council's underlying indebtedness (the Capital Financing Requirement);
- · Reporting of the required prudential and treasury indicators;
- Overall treasury position identifying how the Council has borrowed in relation to this indebtedness, and the impact on investment balances;
- Debt activity;
- Summary of interest rate movements in the year; and
- Investment activity;

6. SCRUTINY OF TREASURY MANAGEMENT ACTIVITIES

- 6.1 The Council complied with its legislative and regulatory requirements in 2012/13 and was not in breach of any of the prudential and treasury management indicators. The table below summarises the key indicators relating to capital expenditure activities in the year. A more detailed report of the indicators is attached as Appendix 1.
- 6.2 The Acting Corporate Director of Resources also confirms that the Council did not undertake any external borrowing during the year, thus operating within the Authorised borrowing limit in the financial year.

7. CAPITAL EXPENDITURE AND FINANCING 2012-13

- 7.1 The Council undertakes capital expenditure on long-term assets. These activities may either be:
 - Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.), which has no resultant impact on the Council's borrowing need; or
 - If insufficient financing is available, or a decision is taken not to apply available resources, the capital expenditure will give rise to a borrowing need.
- 7.2 The actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed.

£m	2011/12	2012/13	2012/13
	Actual	Estimate	Actual
Non-HRA capital expenditure	130.717	124.990	110.254
HRA capital expenditure	31.615	60.376	39.045
Total Capital Expenditure	162.332	185.366	149.299
Resources			
Capital Grants	106.007	126.824	116.010
Direct Revenue Financing	4.861	2.430	3.658
Major Repairs Allowance	11.382	19.328	11.375
Developers Contributions	12.715	7.741	6.263
Capital Receipts	7.462	17.019	11.193
Capital Expenditure (Financed from borrowing)	(19.906)	(12.024)	(0.800)

7.3 Actual capital expenditure was less than the revised budget figure of £161.419m by £16.841m. This underspend was mainly due to programme slippage on the decent homes and high street 2013 programmes. All slipped resources have been reprofiled and incorporated in future years capital programme.

8. OVERALL BORROWING NEED

- 8.1 The Council's underlying need to borrow for capital expenditure is termed the Capital Financing Requirement (CFR). This figure is a gauge of the Council's debt position. The CFR results from the capital activity of the Council and what resources have been used to pay for the capital spend. This represents the 2012/13 unfinanced capital expenditure as set out in the above table, and prior years' net or unfinanced capital expenditure which has not yet been paid for by revenue or other resources.
- 8.2 Part of the Council's treasury activities is to address the funding requirements for this borrowing need. Depending on the capital expenditure programme, the treasury service organises the Council's cash position to ensure sufficient cash is available to meet the capital plans and cash flow requirements. This may be sourced through borrowing from external bodies such as the Public Works Loan Board (PWLB) or the money markets, or utilising temporary cash resources within the Council.
- 8.3 The Council's non-Housing Revenue Accounts (HRA) underlying borrowing need is not allowed to rise indefinitely. Statutory controls are in place to ensure that capital assets are broadly charged to revenue over the life of the asset. The Council is required to make an annual revenue charge, called the Minimum Revenue Provision (MRP), to reduce the CFR. This is effectively a repayment of the non-HRA borrowing need (there is no statutory requirement to reduce the HRA CFR).
- 8.4 The Council's 2012/13 MRP Policy was approved as part of the Treasury Management Strategy Report for 2012/13 on 22 February 2012.
- 8.5 The Council's CFR for the year is shown below, and represents a key prudential indicator. This includes PFI and leasing schemes on the balance sheet, which increase the Council's borrowing need although no borrowing is actually required against these schemes as a borrowing facility is included in the contract.

General Fund CFR (£m)	31-Mar-12	31-Mar-13 Original	31-Mar-13
	Actual	Indicator	Actual
Opening balance	163.046	163.318	162.060
Add unfinanced capital			
expenditure	7.406	12.024	0.800
Add PFI adjustment	41.090	41.090	40.299
Less MRP	(8.392)	(6.943)	(6.686)
Less PFI Adjustment	(41.090)	(41.090)	(40.299)
Closing balance	162.060	168.399	156.174

HRA CFR (£m)	31-Mar-12	31-Mar-13	31-Mar-13	
		Original		
	Actual	Indicator	Actual	
Opening balance	293.375	69.675	69.675	
Add unfinanced capital				
expenditure	12.500	0.000	0.000	
Less HRA Settlement	(236.200)	0.000	0.000	
Closing balance	69.675	69.675	69.675	

- 8.6. **Net Borrowing and the CFR** in order to ensure that borrowing levels are prudent over the medium term, the Council's external borrowing net of investments, must only be for a capital purpose. This essentially means that the Council is not borrowing to support revenue expenditure. Net borrowing should not therefore, except in the short term, have exceeded the sum of CFR for 2012/13 plus the expected changes to the CFR in 2013/14 and 2014/15. This indicator allows the Council some flexibility to borrow in advance of its immediate capital needs in 2012/13.
- 8.7 A summary of opening and closing CFR balances are also set out in table below.

£m	31-Mar-12 Actual	31-Mar-13 Original	31-Mar-13 Actual
Non HRA CFR	162.060	168.399	156.174
HRA CFR	69.675	69.675	69.675
CFR (Total)	231.735	238.074	225.849

- 8.8 **The Authorised Limit** the authorised limit is the "affordable borrowing limit" required by s3 of the Local Government Act 2003. The Council does not have the power to borrow above this level. The table below demonstrates that during 2012/13 the Council has maintained gross borrowing within its authorised limit.
- 8.9 **Maximum Gross Borrowing** this is the maximum outstanding debt owed by the Council at any time during the financial year.
- 8.10 **The Operational Boundary** the operational boundary is the expected borrowing position of the Council during the year. Periods where the actual position is either below or over the boundary is acceptable subject to the authorised limit not being breached.
- 8.11 Actual financing costs as a proportion of net revenue stream this indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream.

£m	2012/13
Authorised limit	285.732
Gross borrowing position	90.408
Operational boundary	265.732
Financing costs as a proportion of net revenue stream (Non-HRA)	2.51%
Financing costs as a proportion of net revenue stream (HRA)	3.98%

9. TREASURY POSITION as at 31 March 2013

9.1 The Council's debt and investment position is organised by the treasury management service in order to ensure adequate liquidity for revenue and capital activities, security for investments and to manage risks within all treasury management activities. Procedures and controls to achieve these objectives are well established both through Member reporting as detailed in section 3 of this report, and through officer activity as detailed in the Council's Treasury Management Practices Schedule. The treasury position at the start and end of 2012/13 was as follows:

Debt £m	31 March 2012 Principal	Rate/ Return	31 March 2013 Principal	Rate/ Return
Fixed Rate Funding:				
-PWLB	13.852	7.63%	12.908	7.55%
-Market	13.000	4.37%	13.000	4.37%
Total Fixed Rate Funding	26.852	6.05%	25.908	5.95%
Variable Rate Funding:				
-PWLB	0		0	
-Market	64.500	1.66%	64.500	4.32%
Total Variable Rate Funding	64.500	1.66%	64.500	4.32%
Total debt	91.352	2.95%	90.408	4.79%
CFR	231.735		225.849	
Over/ (under) borrowing	(140.383)		(135.441)	

Investments: £m				
In house	207.600	1.52%	244.000	1.24%
External managers	0		0	
Total investments	207.600	1.52%	244.000	1.24%

- 9.2 The under-borrowed amount represents the element of the programme that is currently being funded from internally held resources. Although this reduces the need to borrow from external sources, it does not allow for additional borrowing over and above the CFR. The Council also repaid £0.944m of maturing PWLB loans, thereby reducing the overall debt outstanding from £91.4m to £90.4m as at 31 March 2013.
- 9.3 The maturity structure of the debt portfolio was as follows:

£m	31 March 2012 Actual	2012/13 Original Limits	31 March 2013 Actual	31 March 2013 Actual %
Under 12 months	0.923	10%	0.845	0.9%
12 months and within 24 months	0.854	30%	0.671	0.8%
24 months and within 5 years	3.638	40%	3.927	4.3%
5 years and within 10 years	7.227	80%	6.256	6.9%
10 years and above	78.710	100%	78.710	87.1%

9.4 The maturity structure for the investment portfolio was as follows:

£m	31 March 2012 Actual	2012/13 Original Limits	31 March 2013 Actual
Under 1 year	192.60	100%	229.00
More than 1 year	15.00	25.00	15.00
Total	207.60		244.00

10. THE STRATEGY

- 10.1 Interest rates are likely to remain at current levels for some time with the Bank of England not expected to raise Bank Base Rate before 2015. The impact of quantitative Easing and the Funding for Lending Scheme have ensured that funding for financial institutions remains artificially cheap and thus has kept market interest rates low as well. The Council has continued with its conservative approach of prioritising security and liquidity over yield, Investments would therefore continue to be dominated by low counterparty risk considerations though, this results in a high cost of carry as investment returns are relatively low compared to borrowing rates.
- 10.2 A revised Treasury Management Strategy was approved by Full Council at its November 2012 meeting to incorporate the following change:
 - The revised Investment Strategy is as detailed below. This includes changes approved by Full Coucil at its November 2012 meeting.

Institution	Minimum High Credit Criteria	Use	Limit
Debt Management Office (DMO) Deposit Facility	Not applicable	In-house	£100m*
Term deposits – Other Local Authorities	Not applicable	In-house	£10m**
Term deposits – banks and building societies	Short-term F1+, Long-term AA-	In-house	£30m
Institutions with Government guarantee on ALL deposits by high credit rated (sovereign rating) countries.	Sovereign rating	In-house	£30m
UK Government Gilts	Long Term AAA	In-house	£20m
Institutions with UK Government support.	Sovereign rating	In-house	£30m
Institutions that are owned/part owned by the UK Government	Sovereign rating	In-house	Lesser of £70m or 40% of portfolio
Collective Investment Schemes structured as Open Ended Investment Companies (OEICs)			
Money Market Funds	AAA rated	In-house	£15m

Definitions of credit ratings are attached at **Appendix 2**.

^{*} Although limit has been set at £100m for the DMO, in reality there is no restriction on placement with the UK government

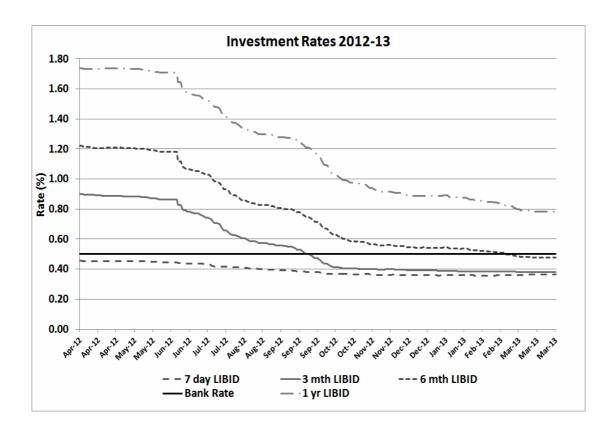
^{**} The group limit for local authorities has been set at £100m.

11. BORROWING OUTTURN

11.1 The Council did not undertake any external borrowing in 2012/13. Capital financing needs were mer either from existing debt or internal borrowing.

12. <u>INVESTMENT RATES</u>

12.1 For the fourth consecutive year, Bank of England base rate remained at a historic low of 0.5% throughout the year. Market expectations of the start of monetary tightening were pushed back during the year to early 2015 at the earliest. The Funding for Lending Scheme resulted in a sharp fall in deposit rates in the second half of the year illustrated in by the chart below.



13. <u>INVESTMENT OUTTURN</u>

- 13.1 The Council's investment policy is governed by CLG guidance, which was implemented in line with the annual investment strategy approved by Full Council on 22 February 2012 and the revised investment strategy approved by Full Council on 25 November 2012. This policy sets out the approach for choosing investment counterparties, and is based on credit ratings provided by the three main credit rating agencies supplemented with additional market data (such as rating outlooks, credit default swaps, bank share prices etc.)
- 13.2 The investment activity during the year conformed to the approved strategy, and the Council had no liquidity difficulties.
- 13.3 The Council maintained an average balance of £251.8m of internally managed funds which earned an average rate of return of 1.24%. This compared favourably against the 7-day LIBID benchmark of 0.39%.

14. COMMENTS OF THE CHIEF FINANCIAL OFFICER

14.1. The comments of the Acting Corporate Director Resources have been incorporated into the report of which he is the author.

15. <u>LEGAL COMMENTS</u>

- 15.1 The Local Government Act 2003 provides a framework for the capital finance of local authorities. It provides a power to borrow and imposes a duty on local authorities to determine an affordable borrowing limit. It provides a power to invest. Fundamental to the operation of the scheme is an understanding that authorities will have regard to proper accounting practices recommended by the Chartered Institute of Public Finance and Accountancy (CIPFA) in carrying out capital finance functions.
- 15.2 The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 require the Council to have regard to the CIPFA publication "Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes" ("the Treasury Management Code") in carrying out capital finance functions under the Local Government Act 2003. If after having regard to the Treasury Management Code the Council wished not to follow it, there would need to be some good reason for such deviation.
- 15.3 The Treasury Management Code requires as a minimum that there be a practice of regular reporting on treasury management activities and risks to the responsible committee and that these should be scrutinised by that committee. It provides that there should be an annual report to the council on
 - The performance of the treasury management function.
 - The effects of the decisions taken and the transactions executed in the past year.
 - Any circumstances of non-compliance with the Council's treasury management policy statement and treasury management practices.
- 15.4 When discharging its treasury management functions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't. Information is contained in section 16 of the report relevant to these considerations.

16. ONE TOWER HAMLETS CONSIDERATIONS

16.1 Interest on the Council's cash flow has historically contributed significantly towards the budget. This Council's ability to deliver its various functions, to meet its Community Plan targets and to do so in accordance with its obligations under the Equality Act 2010 may thus be enhanced by sound treasury management.

17. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

17.1 There are no Sustainable Actions for A Greener Environment implications.

18. RISK MANAGEMENT IMPLICATIONS

18.1 Any form of investment inevitably involves a degree of risk. To minimise risk the investment strategy has restricted exposure of council cash balances to UK backed banks or institutions with the highest short term rating or strong long term rating.

19. CRIME AND DISORDER REDUCTION IMPLICATION

19.1 There are no crime and disorder reduction implications arising from this report.

20. <u>EFFICIENCY STATEMENT</u>

20.1 Monitoring and reporting of treasury management activities ensures the Council optimises the use of its monetary resources within the constraints placed on the Council by statute, appropriate management of risk and operational requirements.

LOCAL GOVERNMENT ACT 1972 (AS AMENDED) SECTION 100D

LIST OF "BACKGROUND PAPERS" USED IN THE PREPARATION OF THIS REPORT

Brief description of "background papers"

Name and telephone number of holder And address where open to inspection

Appendix 1: Prudential and Treasury Indicators

Prudential indicators	2011/12	2012/13	2012/13	2013/14	2014/15	2015/16
Extract from budget and rent setting reports	Actual	Estimate	Actual	Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m	£m
Capital Expenditure						
Non – HRA	130.717	124.990	117.684	102.067	24.172	29.099
HRA	31.615	60.376	31.615	78.481	76.590	61.000
TOTAL	162.332	185.366	149.299	180.548	100.762	90.099
Ratio of Financing Costs To Net Revenue Stream						
Non – HRA	2.12%	2.35%	2.51%	2.89%	3.48%	3.99%
HRA	17.93%	2.29%	3.98%	4.04%	3.95%	3.95%
	£m	£m	£m	£m	£m	£m
Gross Debt and Capital Financing Requirement						
Gross Debt	91.351	92.437	90.408	99.561	113.962	164.903
Capital Financing Requirement	231.735	240.732	225.849	230.666	239.246	284.773
Over/(Under) Borrowing	(140.384)	(148.295)	(135.441)	(131.105)	(125.284)	(119.870)
In Year Capital Financing Requirement						
Non – HRA	(0.986)	(5.886)	(5.886)	3.628	(6.492)	8.378
HRA	12.500	1.189	0.000	0.000	15.072	37.149
TOTAL	11.514	(4.697)	(5.886)	3.628	8.580	45.527
Capital Financing Requirement as at 31 March						
Non - HRA	162.060	168.399	156.174	159.802	153.310	161.688
HRA	305.875	70.864	69.675	70.864	85.936	123.085
HRA Settlement	(236.200)	0.000	0.000	0.000	0.000	0.000
TOTAL	231.735	239.263	225.849	230.666	239.246	284.773
Incremental Impact of Financing Costs (£)						
Increase in Council Tax (band D) per annum	3.579	0.000	0.000	0.908	0.000	1.746
Increase in average housing rent per week	1.781	0.000	0.000	0.544	0.550	0.885

Treasury Management Indicators	2011/12	2012/13	2012/13	2013/14	2014/15	2015/16
	Actual	Original Estimate	Revised Estimate	Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m	£m
Authorised Limit For External Debt -						
Borrowing & Other long term liabilities	256.735	250.849	265.732	255.666	264.246	309.773
Headroom	20.000	20.000	20.000	20.000	20.000	20.000
TOTAL	276.735	270.849	285.732	275.666	284.246	329.773
Operational Boundary For External Debt -						
Borrowing	256.735	250.849	265.732	255.666	264.246	257.764
Other long term liabilities	0.000	0.000	0.000	0.000	0.000	52.009
TOTAL	256.735	250.849	265.732	255.666	264.246	309.773
Gross Borrowing	91.351	90.408	92.437	99.561	113.962	164.903
HRA Debt Limit*	0.000	184.381	184.381	184.381	184.381	184.381
Upper Limit For Fixed Interest Rate Exposure						
Net principal re fixed rate borrowing / investments	100%	100%	100%	100%	100%	100%
Upper Limit For Variable Rate Exposure						
Net interest payable on variable rate borrowing / investments	20%	20%	20%	20%	20%	20%
Upper limit for total principal sums invested for over 364 days						
(per maturity date)	£25m	£25m	£25m	£25m	£25m	£25m
Maturity structure of new fixed rate borrowing during 2013/14	Uppe	r Limit	Lower	r Limit		
under 12 months	10%		0%			
12 months and within 24 months	30%		0%			
24 months and within 5 years	40%		0%			
5 years and within 10 years			0%			
10 years and above	100%		0%			

Appendix 2: Definition of Credit Ratings

Support Ratings

Rating	
1	A bank for which there is an extremely high probability of external support. The potential provider of support is very highly rated in its own right and has a very high propensity to support the bank in question. This probability of support indicates a minimum Longterm rating floor of 'A-'.
2	A bank for which there is a high probability of external support. The potential provider of support is highly rated in its own right and has a high propensity to provide support to the bank in question. This probability of support indicates a minimum Longterm rating floor of 'BBB-'.
3	A bank for which there is a moderate probability of support because of uncertainties about the ability or propensity of the potential provider of support to do so. This probability of support indicates a minimum Long-term rating floor of 'BB-'.
4	A bank for which there is a limited probability of support because of significant uncertainties about the ability or propensity of any possible provider of support to do so. This probability of support indicates a minimum Long-term rating floor of 'B'.
5	A bank for which external support, although possible, cannot be relied upon. This may be due to a lack of propensity to provide support or to very weak financial ability to do so. This probability of support indicates a Long-term rating floor no higher than 'B-' and in many cases no floor at all.

Short-term Ratings

Rating	
F1	Highest credit quality. Indicates the strongest capacity for timely payment of financial commitments; may have an added "+" to
	denote any exceptionally strong credit feature.
F2	Good credit quality. A satisfactory capacity for timely payment of financial commitments, but the margin of safety is not as great as in the case of the higher ratings.
F3	Fair credit quality. The capacity for timely payment of financial commitments is adequate; however, near-term adverse changes could result in a reduction to non-investment grade.

Long-term Ratings

Rating	Current Definition (August 2003)		
AAA	Highest credit quality. 'AAA' ratings denote the lowest expectation of credit risk. They are assigned only in case of exceptionally strong capacity for timely payment of financial commitments. This capacity is highly unlikely to be adversely affected by foreseeable events.		
AA	Very high credit quality. 'AA' ratings denote a very low expectation of credit risk. They indicate very strong capacity for timely payment of financial commitments. This capacity is not significantly vulnerable to foreseeable events.		
A	High credit quality. 'A' ratings denote a low expectation of credit risk. The capacity for timely payment of financial commitments is considered strong. This capacity may, nevertheless, be more vulnerable to changes in circumstances or in economic conditions than is the case for higher ratings.		
BBB	Good credit quality. 'BBB' ratings indicate that there is currently a low expectation of credit risk. The capacity for timely payment of financial commitments is considered adequate, but adverse changes in circumstances and in economic conditions is more likely to impair this capacity. This is the lowest investment-grade category		

Individual Ratings

Rating	
A	A very strong bank. Characteristics may include outstanding profitability and balance sheet integrity, franchise, management, operating environment or prospects.
В	A strong bank. There are no major concerns regarding the bank. Characteristics may include strong profitability and balance sheet integrity, franchise, management, operating environment or prospects
С	An adequate bank, which, however, possesses one or more troublesome aspects. There may be some concerns regarding its profitability and balance sheet integrity, franchise, management, operating environment or prospects.
D	A bank, which has weaknesses of internal and/or external origin. There are concerns regarding its profitability, substance and resilience, balance sheet integrity, franchise, management, operating environment or prospects. Banks in emerging markets are necessarily faced with a greater number of potential deficiencies of external origin.
Е	A bank with very serious problems, which either requires or is likely to require external support.