London Borough of Hammersmith & Fulham

Pension Fund Sub-Committee

Agenda

Tuesday 9 July 2019 at 7.05 pm
Committee Room 3 - Hammersmith Town Hall

MEMBERSHIP

Administration	Opposition
Councillor Iain Cassidy Councillor Rebecca Harvey Councillor PJ Murphy	Councillor Matt Thorley
Co-optee	
Michael Adam	

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Members of the public are welcome to attend, and the building has disabled access.

Date Issued: 01 July 2019

London Borough of Hammersmith & Fulham

Pension Fund Sub-Committee
Agenda

Item		**Pages**
1.	**MINUTES OF THE PREVIOUS MEETING**	4 - 6
	To approve as an accurate record and the Chair to sign the minutes of the meeting held on 26 March 2019.	
2.	**APOLOGIES FOR ABSENCE**	
3.	**DECLARATIONS OF INTEREST**	
	If a Councillor has a disclosable pecuniary interest in a particular item, whether or not it is entered in the Authority's register of interests, or any other significant interest which they consider should be declared in the public interest, they should declare the existence and, unless it is a sensitive interest as defined in the Member Code of Conduct, the nature of the interest at the commencement of the consideration of that item or as soon as it becomes apparent. At meetings where members of the public are allowed to be in attendance and speak, any Councillor with a disclosable pecuniary interest or other significant interest may also make representations, give evidence or answer questions about the matter. The Councillor must then withdraw immediately from the meeting before the matter is discussed and any vote taken. Where Members of the public are not allowed to be in attendance and speak, then the Councillor with a disclosable pecuniary interest should withdraw from the meeting whilst the matter is under consideration. Councillors who have declared other significant interests should also withdraw from the meeting if they consider their continued participation in the matter would not be reasonable in the circumstances and may give rise to a perception of a conflict of interest. Councillors are not obliged to withdraw from the meeting where a dispensation to that effect has been obtained from the Audit, Pensions and Standards Committee.	
4.	**QUARTERLY UPDATE PACK**	7 - 54
	This paper provides the Pension Fund Sub-Committee with a summary of the Pension Fund's overall performance for the quarter ended 31 March 2019.	
5.	**MCCLOUD, COST CAP AND VALUATION**	55 - 86
	This paper provides the Pension Fund Sub-Committee with background information on the LGPS cost cap in public service pensions and recent	

developments.

Agenda Item 1

London Borough of Hammersmith & Fulham

Pensions Sub-Committee

Minutes

Tuesday 26 March 2019

PRESENT

Committee members: Councillors Iain Cassidy, Rebecca Harvey, Asif Siddique and Matt Thorley

Co-opted members: Michael Adam

Officers: Phil Triggs (Director of Treasury & Pensions), Matthew Hopson (Strategic Investment Manager), Timothy Mpofu (Pension Fund Manager), and Amrita Gill (Committee Co-ordinator)

Guests: Kevin Humpherson & Jonny Moore (Deloitte)

1. MINUTES OF THE PREVIOUS MEETING

RESOLVED –

THAT, the minutes of the meeting held on 13 February 2019 were approved and signed by the chair

2. APOLOGIES FOR ABSENCE

There were no apologies for absence.

3. DECLARATIONS OF INTEREST

There were no declarations of Interest.

4. BUY AND MAINTAIN MANAGER APPOINTMENT

Matt Hopson, Strategic Investment Manager, invited members to express their views on BlackRock and PIMCO, buy and maintain investment managers following the training session held on 26 March 2019.

Councillor Rebecca Harvey, referring to PIMCO's presentation, asked why there a drop-in performance in had been 2018. Matt Hopson explained that the bond value had fallen due to the increase in interest rates during that period.

Matt Hopson explained that the two investment managers offered different options to the Fund. BlackRock was a more actively managed and sterling focused fund. PIMCO was a very experienced fixed income manager with possibly the largest team of analysts globally, therefore offered more diversification in global markets.

Members felt that PIMCO presented as a better option for the Pension Fund due to the diversification benefits and asked for further clarification around the management fees for PIMCO. In response, Phil Triggs, Director of Treasury & Pensions, explained that the reduced fee offered by PIMCO would be reviewed in 2 years - the new rate would be established based on the total LCIV value of the sub-fund after 2 years.

Members asked if information regarding PIMCO's hedging process could be circulated to the Sub-Committee as this was not covered during the training session.

RESOLVED -

THAT, the Sub-Committee appoint PIMCO as a buy and maintain investment manager.

5. EXCLUSION OF THE PUBLIC AND PRESS

The Committee is invited to resolve, under Section 100A (4) of the Local Government Act 1972, that the public and press be excluded from the meeting during the consideration of the following items of business, on the grounds that they contain the likely disclosure of exempt information, as defined in paragraph 3 of Schedule 12A of the said Act, and that the public interest in maintaining the exemption currently outweighs the public interest in disclosing the information.

6. BUY AND MAINTAIN MANAGER APPOINTMENT - EXEMPT ELEMENTS

The exempt elements of this item were noted.

Meeting started: 7:00pm
Meeting ended: 7:30pm

Chair ....

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London Borough of Hammersmith & Fulham PENSIONS SUB-COMMITTEE 9 July 2019	
PENSION FUND QUARTERLY UPDATE PACK	
Report of the Strategic Director of Finance & Governance	
Open Report	
Classification: For Information **Key Decision: No**	
Wards Affected: None	
Accountable Director: Phil Triggs, Director of Pensions and Treasury	
Report Authors: Tim Mpofu, Pension Fund Manager	**Contact Details:** Tel: 0207 641 6308 E-mail: tmpofu@westminster.gov.uk

1. EXECUTIVE SUMMARY

1.1. This paper provides the Pension Fund Sub-Committee with a summary of the Pension Fund's:

a. Overall performance for the quarter ended 31 March 2019.
b. Cashflow update and forecast.
c. Assessment of risks and actions taken to mitigate these.
d. Sub-Committee's strategic forward plan.

2. RECOMMENDATIONS

2.1. The Pension Fund Sub-Committee is recommended to note this report.

3. LBHF PENSION FUND QUARTERLY UPDATE – Q4 2018/19

3.1. This report and associated appendices make up the pack for the quarter ended 31 March 2019. An overview of the Pension Fund's performance is provided in Appendix 1. This includes administrative, investment, and cash management performance for the quarter.

3.2. Appendix 2 provides information about the Pension Fund's investments and performance. Kevin Humpherson from Deloitte will be attending the meeting to present this report.

3.3. The Pension Fund's cashflow monitor is provided in Appendix 3. This shows both the current account and invested cash movements for the last quarter, as well as cashflow forecasts to December 2019. An analysis of the differences between the actuals and the forecasts for the quarter is also included.

3.4. Appendix 4 contains the Pension Fund's Risk Registers which were revamped to show a more meaningful assessment of risks and the actions taken to mitigate them. These also highlight the risks that are increasing in their likelihood for enhanced monitoring by officers.

3.5. A summary of the voting undertaken by the investment managers running segregated equity portfolios forms Appendix 5. This includes both the London CIV Majedie and and London CIV Ruffer funds.

3.6. Appendix 6 gives an update on the Forward Plan as at 31 March 2019.

3.7. At its last meeting, the Pensions Sub-Committee appointed the London CIV to manage its Buy & Maintain portfolio. The investment was completed in May 2019.

4. LEGAL IMPLICATIONS

4.1. None.

5. FINANCIAL IMPLICATIONS

5.1. Information only.

6. IMPLICATIONS FOR BUSINESS

6.1. None.

7. BACKGROUND PAPERS USED IN PREPARING THIS REPORT

7.1. None

LIST OF APPENDICES:

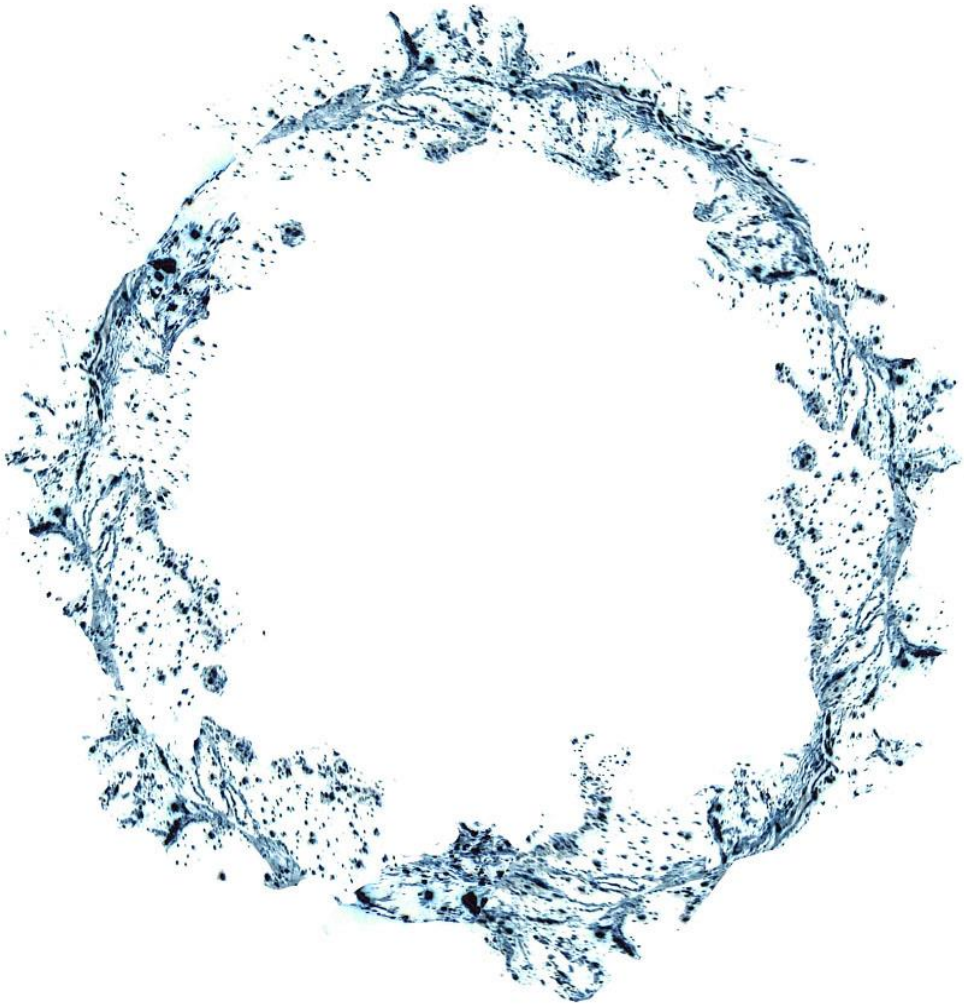
Appendix 1: Scorecard at 31 March 2019
Appendix 2: Deloitte Quarterly Report for Quarter Ended 31 March 2019
Appendix 3: Cashflow Monitoring Report
Appendix 4: Pension Fund Risk Register
Appendix 5: Pension Fund Voting Summary
Appendix 6: Pensions Sub-Committee Forward Plan

Appendix 1: Scorecard at 31 March 2019

HAMMERSMITH AND FULHAM PENSION FUND QUARTERLY MONITORING

	Jun 18	Sep 18	Dec 18	Mar 19	Comment/ Report Ref if applicable
Value (£m)	1,035.3	1,055.6	986.6	1,037.0	Deloitte Report Gross of Fees
% return quarter	4.1%	1.6%	-5.7%	5.5%	
% return one year	5.2%	5.8%	-2.8%	6.3%	
LIABILITIES					
Value (£m)	1,073.6	1,045.9	1,057.3	1,057.3	No funding update was carried out in Q1 2019, as the assumptions have been changed ahead of the triennial valuation
Deficit (£m)	52.0	38.2	27.6	27.6	
Funding Level	95%	96%	97%	97%	
MEMBERSHIP					
Active members	4,166	4,307	4,306	4,332	The number of employers has decrease due to a data cleanse exercise. There were only a couple of cessations during the period
Deferred beneficiaries	6,603	5,752	5,703	6,840	
Pensioners	4,920	4,986	5,018	5,111	
Employers	41	61	61	50*	
CASHFLOW					
Cash balance	£6.6m	£4.1m	£0.8m	£2.7m	Appendix 3
Variance from forecast	£0.6m	£0.4m	-£0.6m	£0.8m	
RISK					
No. of new risks	0	39	2	0	Appendix 4 – Risk Register
No. of ratings changed	0	0	0	16	
VOTING					
No. of resolutions voted on by fund managers	5,711	4183	3182	324	Appendix 5 – Ruffer & Majedie
LGPS REGULATIONS					
New consultations	None	None	MHCLG Pooling	MHCLG Pooling	Included in Item 2
New sets of regulations	None	IFRS9	None	None	

Deloitte.



London Borough of Hammersmith & Fulham Pension Fund

Investment Performance Report to 31 March 2019

Deloitte Total Reward and Benefits Limited
July 2019

Contents

1 Market Background

1.1 Three months and twelve months to 31 March 2019

Global equity markets rebounded strongly in the first quarter of 2019 after the sharp downturn experienced at the end of 2018, as fears over the US-China trade war eased following constructive talks and hopes of a resolution, while central banks moved to a more accommodating monetary policy signalling a halt to any further imminent rate rises.

UK equities also made gains over the quarter to 31 March 2019 with the FTSE All Share Index delivering a positive return of 9.4%. Whilst still uncertain, investors perceived the probability of a cliff-edge Brexit to have fallen following the UK Parliament's strong opposition to 'no deal', boosting hopes of a 'softer' outcome, with UK equities and sterling rising as a result. Meanwhile the underlying UK economy produced mixed signals against this uncertain political backdrop, as reported economic growth expectations slowed in line with the wider global slowdown, but unemployment fell below 4% and real wage growth continued to outpace inflation.

The FTSE 100 Index increased by 9.5% while the FTSE 250 gained 9.7% as the gains were shared among both larger international companies and smaller domestic focused companies alike. At the sector level, Technology was the best performer returning 22.8%, while Telecommunications was the only sector to deliver a negative return, falling by 6.1%.

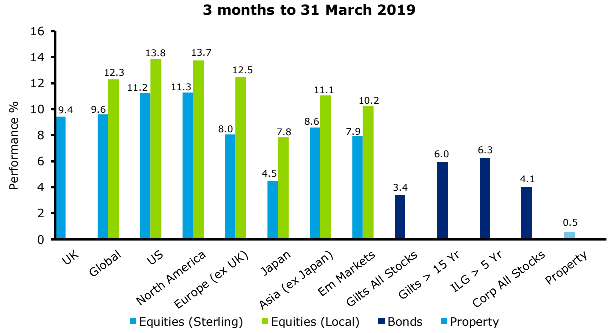
Global markets as a whole outperformed UK equities in local currency terms (12.3%) but performed broadly in line in sterling terms (9.6%) due to the appreciation of sterling, which meant that currency hedging contributed positively to the returns delivered to investors over the quarter. All regions made significant gains, led by the US which returned 13.8%, whilst Japan was the worst performer but still gained 7.8%, as measured in local currency terms.

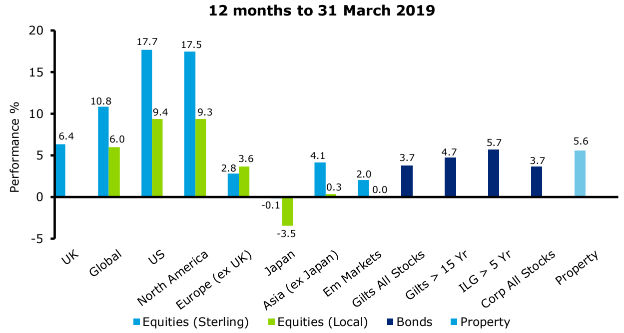
Nominal gilt yields fell sharply by about 20-30 bps across the curve and the All Stocks Gilts Index delivered a positive return of 3.4% over the quarter. Real yields also fell by a similar amount with the Over 5 Year Index-Linked Gilts Index delivering a return of 6.3% over the same period. Credit spreads tightened over the quarter, and combined with the fall in gilt yields led corporate bonds to perform strongly, with the iBoxx All Stocks Non Gilt Index returning 4.1% over the quarter.

Over the 12 months to 31 March 2019, the FTSE All Share delivered a positive return of 6.4% as the rebound in the most recent quarter offset the sharp fall at the end of 2018. At the sector level there was a wide dispersion of returns. Technology was the best performing sector returning 28.2%, whilst Telecommunications was the poorest performing sector delivering a negative return of -18.8%. Global equities performed broadly in line with UK equities in local terms (6.0%) but outperformed in sterling terms (10.8%) due to the depreciation of sterling over the year.

UK nominal gilts achieved positive returns over the 12 months to 31 March 2019, as nominal gilt yields fell by c. 20bps over the period. The All Stocks Gilts Index returned 3.7% and the Over 15 Year Gilts Index returned 4.7% over the year. UK index-linked gilts delivered positive returns as real yields also fell across the curve, particularly at shorter durations, with the Over 5 Year Index-Linked Gilts Index returning 5.7%. Corporate bonds performed similarly to gilts over the year, as their higher income yield was offset by a widening in credit spreads. The iBoxx All Stocks Non Gilt Index delivered a return of 3.7%.

The MSCI UK All Property Index returned 0.5% over the 3 months to 31 March 2019 and 5.6% over the 12 months to 31 March 2019 as the property market has begun to cool in recent quarters in light of uncertainty over Brexit and a slowing UK economy.





2 Performance Overview

2.1 Investment Performance to 31 March 2019

Breakdown of Fund Performance by Manager as at 31 March Fund	Manager	3 month	1 year	2 year p.a.	3 year p.a.	5 year p.a.
Equity Mandate						
	LCIV UK Equity Fund[2]	7.1	3.3	0.3	7.5	5.1
FTSE All Share		9.4	6.4	3.7	9.4	6.0
Difference		-2.3	-3.1	-3.4	-1.9	-0.9
	LGIM Low Carbon	10.1	n/a	n/a	n/a	n/a
MSCI World Low Carbon Target Index		10.2	n/a	n/a	n/a	n/a
Difference		0.0	n/a	n/a	n/a	n/a
Dynamic Asset Allocation Mandates						
	LCIV Absolute Return Fund[2]	3.1	-0.4	-1.2	3.0	3.6
3 Month Sterling LIBOR + 4% p.a.		1.2	4.8	4.6	4.6	4.6
Difference		1.9	-5.2	-5.8	-1.5	-1.0
Private Equity						
	Invesco	-10.4	13.4	6.5	11.8	17.0
	Unigestion	-4.3	8.0	4.5	7.4	7.6
Secure Income						
	Partners Group MAC	-0.2	3.8	3.9	4.5	n/a
3 Month Sterling LIBOR + 4% p.a.		1.2	4.8	4.6	4.6	n/a
Difference		-1.4	-1.1	-0.7	-0.1	n/a
	Oak Hill Advisors	3.8	0.5	1.4	4.9	n/a
3 Month Sterling LIBOR + 4% p.a.		1.2	4.8	4.6	4.6	n/a
Difference		2.6	-4.3	-3.3	0.3	n/a
	Partners Group Infra	-4.9	6.0	-2.5	2.4	n/a
	Aviva Infra Income	1.3	n/a	n/a	n/a	n/a
Inflation *Protection*						
	M&G	4.6	8.3	6.2	9.4	n/a
RPI + 2.5% p.a.		0.4	4.9	5.4	5.5	n/a
Difference		4.2	3.3	0.8	4.0	n/a
	Aberdeen Standard	1.0	6.4	8.1	7.6	n/a
FT British Government All Stocks Index		3.9	5.8	4.1	5.6	n/a
Difference		-2.9	0.6	4.0	2.0	n/a
Total Fund		5.5	6.3	3.8	8.5	6.0
Benchmark[1]		5.1	8.0	5.8	8.6	6.3
Difference		0.3	-1.7	-2.0	-0.1	-0.3

Source: Northern Trust (Custodian). Figures are quoted net of fees and estimated by Deloitte. Differences may not tie due to rounding.
[1] The Total Assets benchmark is the weighted average performance of the target asset allocation.
[2] Quarter and year performance figures estimated using London CIV quarterly reports. Longer term performance has been provided by Northern Trust. LCIV UK Equity Fund is managed by Majedie and was incepted on 18 May 2017. LCIV Absolute Return Fund is managed by Ruffer and was incepted on 21 June 2016.

3 Total Fund

3.1 Investment Performance to 31 March 2019

	Last Quarter (%)	One Year (%)	Two Years (% p.a.)	Three Years (% p.a.)	Five Years (% p.a.)
Total Fund – Gross of fees	5.5	6.7	4.2	8.9	6.4
Net of fees(1)	5.5	6.3	3.8	8.5	6.0
Benchmark(2)	5.1	8.0	5.8	8.6	6.3
Net performance relative to benchmark	0.3	-1.7	-2.0	-0.1	-0.3

Source: Northern Trust. Relative performance may not sum due to rounding.

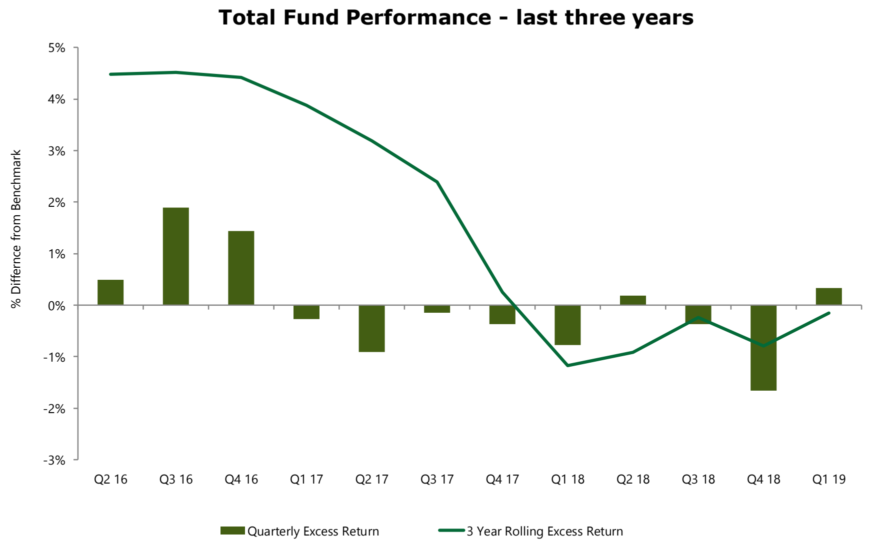
(1) Estimated by Deloitte

(2) Average weighted benchmark

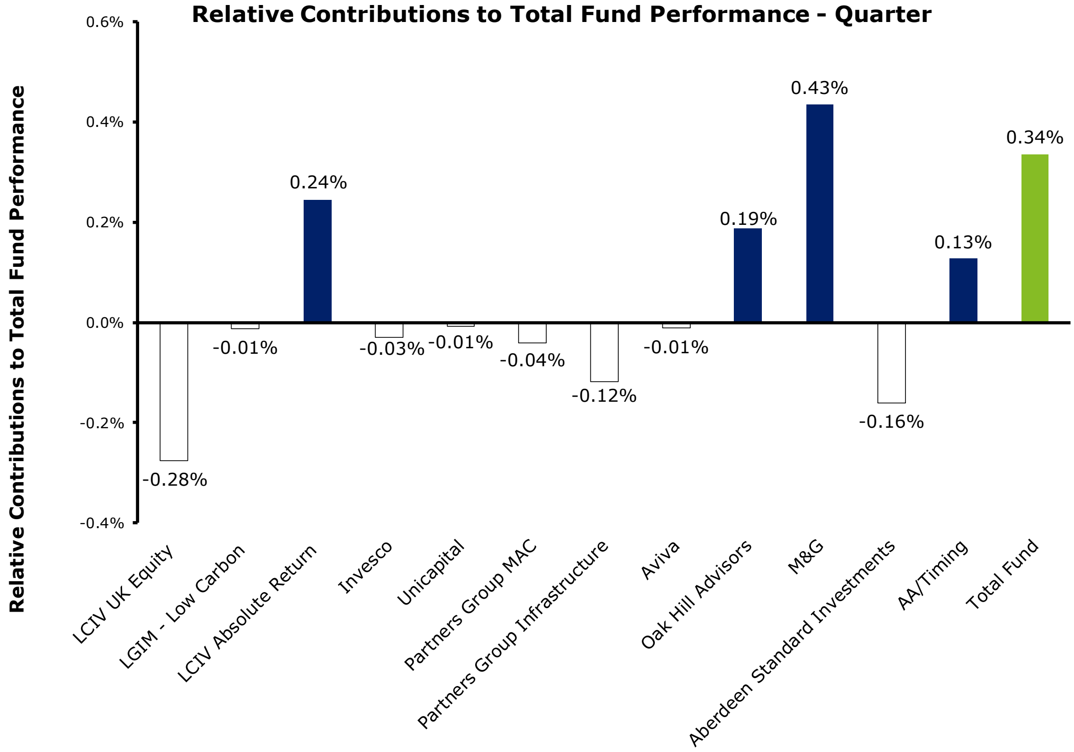
Over the quarter to 31 March 2019, the Total Fund returned 5.5% on a net of fees basis, outperforming the fixed weight benchmark by 0.3%.

The Total Fund underperformed the benchmark by 1.7% on a net of fees basis over the year to 31 March 2019, returning 6.3%. Over the longer three and five year periods to 31 March 2019, the Total Fund returned 8.5% p.a. and 6.0% p.a. respectively on a net of fees basis, underperforming the benchmark by 0.1% p.a. and 0.3% p.a.

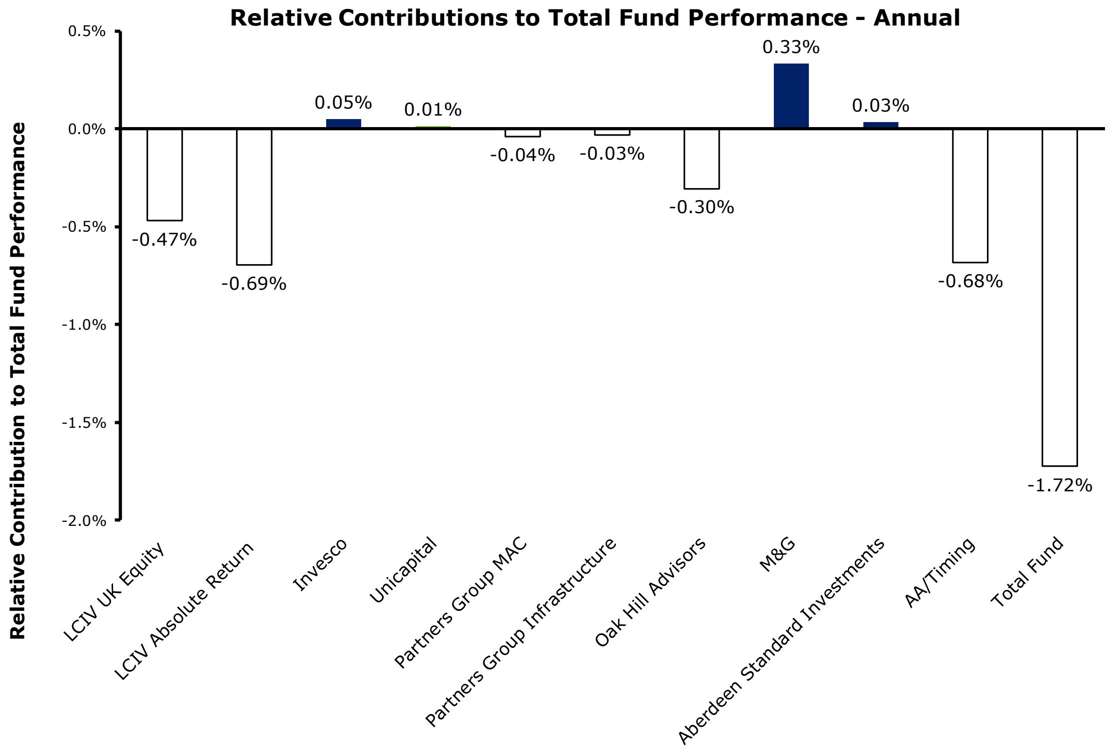
The chart below compares the net performance of the Fund relative to the fixed weight benchmark over the three years to 31 March 2019. The 3-year rolling excess return remained negative over the quarter, improving slightly since the fourth quarter of 2018.



3.2 Attribution of Performance to 31 March 2019



Over the first quarter of 2019, the Fund's outperformance was primarily due to outperformance from M&G, the LCIV Absolute Return Fund and Oak Hill Advisors. This was partially offset by underperformance from the LCIV UK Equity Fund and Aberdeen Standard Investments, which underperformed their respective benchmarks.



Over the 12 month period to 31 March 2019, the Fund has underperformed the composite benchmark by 1.7%. Underperformance over the year was largely as a result of relative underperformance by the LCIV Absolute Return Fund and the LCIV UK Equity Fund. The "AA/Timing" bar also provided a large negative contribution to relative performance, this represents the impact of the Fund of having an overweight Dynamic Asset Allocation holding during a period of relative underperformance, and also includes the underperformance delivered by the Insight Bonds Plus Fund over the year prior to being disinvested.

3.3 Asset Allocation

The table below shows the value of assets held by each manager as at 31 March 2019 alongside the Target Benchmark Allocation.

Manager	Asset Class	Actual Asset Allocation 31 Dec 2018 (£m)	31 Mar 2019 (£m)	31 Dec 2018 (%)	31 Mar 2019 (%)	Benchmark Allocation (%)
LCIV	UK Equity (Active)	117.7	125.2	11.9	12.1	15.0
LGIM	Low Carbon Equity (passive)	339.9	374.3	34.4	36.1	30.0
	Total Equity	**457.6**	**499.5**	**46.3**	**48.2**	**45.0**
LCIV	Absolute Return	123.8	126.6	12.5	12.2	10.0
Insight	Bonds Plus	86.3	0.0	8.7	0.0	0.0
LCIV	Global Bond	0.0	0.0	0.0	0.0	10.0
	Total Dynamic Asset Allocation	**210.1**	**126.6**	**21.3**	**12.2**	**20.0**
Invesco	Private Equity	2.9	2.3	0.3	0.2	0.0
Unicapital	Private Equity	1.7	1.4	0.2	0.1	0.0
	Total Private Equity	**4.6**	**3.8**	**0.5**	**0.4**	**0.0**
Partners Group	Multi Asset Credit	28.2	26.9	2.9	2.6	5.0
Oak Hill Advisors	Diversified Credit Strategy	70.4	73.2	7.1	7.1	7.5
Partners Group	Direct Infrastructure	16.6	17.0	1.7	1.6	5.0
Aviva	Infrastructure Income	30.2	30.6	3.1	3.0	2.5
	Secure Income	**145.4**	**147.8**	**14.7**	**14.2**	**20.0**
M&G	Inflation Opportunities	103.0	107.8	10.4	10.4	10.0
Aberdeen Standard Investments	Long Lease Property	54.9	55.6	5.6	5.4	5.0
	Total Inflation Protection	**157.9**	**163.4**	**16.0**	**15.8**	**15.0**
LGIM	Liquidity Fund	10.9	96.0	1.1	9.3	0.0
	Total	**986.6**	**1,037.0**	**100.0**	**100.0**	**100.0**

Source: Northern Trust (Custodian) and have not been independently verified
Figures may not sum to total due to rounding

During the first quarter of 2019, the Fund fully disinvested from the Insight Bonds Plus Fund. As at 31 March 2019, the disinvested funds were held in the LGIM Liquidity Fund in preparation to be invested in the LCIV Global Bond Fund, managed by PIMCO. The moneys were invested in the LCIV Global Bond Fund in early May.

As at 31 March 2019, the Fund was overweight to equities and inflation protection relative to the strategic benchmark. The Fund was also underweight to secure income as at the end of the first quarter of 2019, primarily due to the Partners Group Multi-Asset Credit Fund distributing funds back to investors and the Partners Group Direct Infrastructure Fund still in the process of drawing funds into its portfolio.

3.4 Yield Analysis as at 31 March 2019

The following table shows the running yield on the Fund's investments:

Manager	Asset Class	Yield as at 31 March 2019
LCIV	UK Equity	3.90%
LGIM	Low Carbon Equity	0.26%*
LCIV	Absolute Return	1.50%
Partners Group	Multi-Asset Credit	6.20%
Oak Hill Advisors	Diversified Credit Strategy	7.00%
M&G	Inflation Opportunities	2.53%**
Aberdeen Standard Investments	Long Lease Property	4.11%
	Total	**1.57%**

*Benchmark yield is 2.8% (represents the income that would be generated). The LGIM MSCI World Low Carbon Target Index Fund is not currently eligible for NDIP payments and so there is no yield available for the fund. Yield of 0.26% represents the running yield of the LGIM World Equity Index GBP Hedged Fund.
**Yield as at 31 December 2018.

4 Summary of Manager Ratings

The table below summarises Deloitte's ratings of the managers employed by the Fund and triggers against which managers should be reviewed.

Manager	Mandate	Triggers for Review	Rating
Majedie	LCIV UK Equity	Further turnover within the core investment team Re-opening the UK equity products with no clear limits on the value of assets that they would take on	2
LGIM	Low Carbon Equity	Major deviation from the benchmark return Significant loss of assets under management	1
Ruffer	LCIV Absolute Return	Departure of either of the co-portfolio managers from the business Any significant change in ownership structure	1
Partners Group	Multi Asset Credit	Significant changes to the investment team responsible for the Fund *Note the mandate is subject to a 7 year lock-up period	1
	Direct Infrastructure	Significant changes to the investment team responsible for the Fund. *Note the mandate is subject to a 10 year lock-up period	1
Oak Hill Partners	Diversified Credit Strategy	Significant changes to the investment team responsible for the Fund. Significant changes to the liquidity of underlying holdings within the Fund.	1
Aviva Investors	Infrastructure Income	Significant changes to the investment team responsible for the Fund	1
M&G	Inflation Opportunities	If the Fund's portfolio manager Gary Parker was to leave the business or cease to be actively involved in the Fund, this would trigger a review of the Fund. Failure to find suitable investments within the initial two year funding period.	1
Aberdeen Standard Investments	Long Lease Property	Richard Marshall leaving the business or ceasing to be actively involved in the Fund without having gone through an appropriate hand-over. A build up within the Fund of holdings with remaining lease lengths around 10 years.	1

4.1 London CIV

Business

As at 31 March 2019, the assets under management within the 14 sub-funds of the London CIV was £8,203m. The total assets under oversight (which includes passive investment held outside of the CIV platform) increased by £0.5bn to £18.0bn over the quarter, which represents over 50% of London's total LGPS assets.

Personnel

Mike O'Donnell was appointed as the London CIV's CEO at the beginning of March. Mike is a senior finance professional and non-executive director with a background in local government finance, including twelve years as Executive Director responsible for Finance at LB Camden and nine month seconded to Birmingham City Council. He has chaired LFAC and been president of SLT the representative group for London s151 officers.

Following quarter end, at the beginning of May, Michael Pratten joined as interim Chief Investment Officer (CIO). Michael joins from Canopious where he was CIO for over five years, prior to this Michael was CIO and Managing Director at Coal Pension Trustees and has held senior positions at Wellington Asset Management and Equitas Limited.

Deloitte view – It is crucial that steps are taken to rebuild the senior management team and an appropriate strategy agreed for taking the pool forward, getting "buy-in" from the shareholders. We are continuing to monitor developments on the business side as well as the new fund launches.

4.2 Majedie

Business

Majedie's total assets under management as at 31 March 2019 was c. £12.4bn, an increase of c. £0.6bn over the quarter.

Personnel

Majedie is currently looking to hire a UK Small Cap manager, following the decision to replace Richard Staveley in January 2019. Majedie is currently in interview stages to replace Richard, with Imran Sattar and Emily Barnard running the sleeve in the meantime.

Following quarter end, in April 2019 Yuri Khodjamirian, co-manager of UK Income, announced he is leaving Majedie to return to scientific academia. Majedie therefore took the decision to make changes to their UK strategies:

- Imran Sattar will replace Matthew Smith on the UK Equity strategy, with Imran retaining his existing UK Focus portfolio responsibilities;
- Mike Totton will replace Matthew Smith on the UK Focus strategy, Mike will also become co-manager of the UK Income Strategy, alongside Mark Wharrior; and
- Matthew Smith will remain lead manager of the Tortoise Fund, providing sole focus on this strategy.

In addition, from 3 June 2019, Dan Ekstein will join Majedie. Dan is currently head of European Food Retail Research at UBS.

Majedie has also appointed another graduate trainee to the investment team who is set to begin in autumn.

Deloitte view – We recently met with Majedie regarding recent performance and team changes. Please see Majedie UK Equity Fund Review provided by Deloitte.

4.3 LGIM

Business

As at 31 December 2018, Legal & General Investment Management ("Legal & General") had total assets under management ("AuM") of £1,015bn, an increase of £30bn since 30 June 2018.

Personnel

At a firm level, LGIM announced that Michelle Scrimgeour will replace outgoing Mark Zinkula as CEO of LGIM (UK), subject to regulatory approval, and will work closely with Mark over the coming months until he leaves the business in August. Michelle joins from Columbia Threadneedle where she held the role of CEO with responsibility for the EMEA (Europe, Middle East and Africa) region. Michelle has over 30 years' experience at asset management firms and before Threadneedle she was Chief Risk Officer at M&G Investments.
Siobhan Boylan left her role as CFO in January 2019. Richard Lee, who left his role as Group Performance Director, having previously held positions as CFO and Chief Risk Officer for Legal & General Retirement, replaced Siobhan.

Three further senior appointments took place over the first quarter of 2019 as Nathan Jones, Sonja Laud and Will Riley joined LGIM to take up the roles of Global Head of Operational Risk, Deputy CIO and Head of Solutions respectively. Nathan's role will cover operational risk for the global business and will report to the CRO. Sonja Laud will work closely with and support the current CIO Anton Eser in her role as Deputy CIO. Sonja joined from Fidelity and has an active management background with a focus on developing solutions for clients. Will Riley joined LGIM to take up the role of Head of Solutions from BlackRock where he held a senior solutions role, and has experience in developing and managing investment solutions across multiple asset classes.

At the Index team level, there were three new appointments as Lawrence Chir joined as Index Equity Fund Manager, Eva Zhang joined as Index Fixed Income Fund Manager and Luca Ramottis joined as an ETF Analyst.

Deloitte View - We continue to rate Legal & General positively for its passive capabilities.

4.4 Ruffer

Business
Over the quarter to 31 March 2019, Ruffer's total assets under management increased by £0.3bn to £21.2bn.

Personnel
There were no significant team or personnel changes over the first quarter of 2019.

Deloitte view – The Ruffer product is distinctive within the universe of diversified growth managers with the manager willing to take contrarian, long term positions, where necessary drawing on the expertise of external funds.

4.5 Partners Group

Business - Multi Asset Credit
The net asset value of the MAC Fund was c. £130m as at 31 March 2019, a fall of c. £12m from 31 December 2018 following the two distributions made in January and March. The investment period for the 2014 MAC vintage finished at the end of July 2017, and the Fund has continued to make distributions back to investors.

Business - Direct Infrastructure
Total commitment value as at 31 March 2019 was c. €1,081m.

The Fund ended the first quarter of 2019 at c. 38.6% drawn down. As at 31 March 2019, 33.4% of cash called is active in the portfolio.

Deloitte View - We continue to rate Partners Group for its private market capabilities.

4.6 Oak Hill Advisors – Diversified Credit Strategy (DCS)

Business
Oak Hill Advisors held assets under management of $34.0bn as at 1 February 2019, an increase of c. $1.2bn over the quarter.

Over the first quarter of 2019, the Fund had $210m of net inflows.

Personnel
Over the quarter to 31 March 2019, Gregory Leveto joined Oak Hill Advisors as Managing Director within the U.S. Credit team.

Following quarter end, Alexandra Jung, Head of European Investments & Partner, will be transitioning to a Senior Advisor role. Alexandra previously primarily oversaw the European distressed business, the Diversified Credit Strategy has decreased its exposure to European distressed business assets over time due to low liquidity.

Deloitte view – We are comfortable with how the strategy is being managed and the level of risk within the strategy.

4.7 Aviva Investors

Business
The Aviva Infrastructure Income Fund had a total subscription value of approximately £1,274m from initial commitments plus re-invested distributions as at 31 March 2019. No investor commitments were received over the first quarter of 2019, although the Fund had distributions re-invested of an approximate value of c. £10m. The undrawn amount as at 31 March 2019 was £179.5m.

Personnel
Two additional analysts were appointed to the team during January 2019. There were no significant changes to the Infrastructure Fund team over the quarter.

Deloitte View - We continue to rate Aviva Investors positively for its infrastructure capabilities.

4.8 M&G – Inflation Opportunities Fund

Business
M&G's Inflation Opportunities V Fund held total assets under management of c. £538m as at 31 March 2019, an increase of c. £21m over the quarter.

During June 2019, M&G drew attention to new and incoming changes to legislation regarding UK tax and capital gains realised on the disposal of UK property. As currently drafted, the Inflation Opportunities Fund will be subject to UK corporation tax on capital gains realised through its underlying holdings within the Secured Property Income Fund and Secured Lease Income Fund. As a result, this means that previously tax-exempt investors may be subject to taxation and returns may decrease. Tax is applied to the fund vehicle, not the investor. M&G is currently actively pressing against the changes that have occurred in recent months as it believes the changes to have unintended consequences to tax exempt investors. We are currently in the process of reviewing the changes and implications to the Fund's investment with M&G.

Personnel

There were no significant changes to the M&G Inflation Opportunities Fund at a team level over the quarter to 31 March 2019.

At a senior level, during March 2019, M&G Prudential appointed Jack Daniels as Chief Investment Officer subject to regulatory approval with the aim of providing a cohesive approach to investment manufacturing capability, strategy and performance.

Also, in March 2019, Simon Pilcher stepped down from his roles as CEO of the Institutional Fixed Income Business and Chairman of Real Estate. Will Nicoll is taking on Simon's responsibilities for Institutional Fixed Income, reporting to Jack Daniels.

Deloitte view –The strategy has a high allocation to long lease property, while we are positive on this asset class, it does create overlap with the Fund's Long Lease Property mandate with Aberdeen Standard Investments. As such, the Committee may wish to consider whether there are alternative options that could be considered for all or part of the allocation in this strategy which offer at least a degree of "inflation proofing".

4.9 Aberdeen Standard Investments – Long Lease Property

Business

At the end of the first quarter of 2019, the long lease fund held assets under management of c. £2.5bn, an increase of c. £0.1bn over the quarter.

Personnel

There were no team changes over the first quarter of 2019.

Process

Since the two businesses merged, ASI has put in place a formalised process where all potential transactions are reviewed and an "allocation policy" applied where interest is expressed in the investment by more than one fund/client portfolio.

Deloitte View – We continue to rate Aberdeen Standard Investments positively for its long lease property capabilities.

5 London CIV

5.1 Investment Performance to 31 March 2019

As at 31 March 2019, the assets under management within the 14 sub-funds of the London CIV was £8,203m. The total assets under oversight (which includes passive investment held outside of the CIV platform) increased by c. £0.5bn to c. £18.0bn over the quarter, which represents over 50% of London's total assets. The table below provides an overview of the sub-funds currently available on the London CIV platform.

Sub-fund	Asset Class	Manager	Total AuM as at 31 December 2018 (£m)	Total AuM as at 31 March 2019 (£m)	Number of London CIV clients	Inception Date
LCIV UK Equity	UK Equity	Majedie	467	418	2	18/05/17
LCIV Global Equity Alpha	Global Equity	Allianz Global Investors	106	119	1	02/12/15
LCIV Global Alpha Growth	Global Equity	Baillie Gifford	2,092	2,470	13	11/04/16
LCIV Global Equity	Global Equity	Newton	557	606	3	22/05/17
LCIV Global Equity	Global Equity	Longview Partners	700	751	5	17/07/17
LCIV Equity Income	Global Equity	Epoch Investment Partners	222	240	2	08/11/17
LCIV Emerging Market Equity	Global Equity	Henderson Global Investors	276	381	6	11/01/18
LCIV Sustainable Equity Fund	Global Equity	RBC Global Asset Management (UK)	249	282	2	18/04/18
LCIV Global Total Return	Diversified growth fund	Pyrford	308	317	5	17/06/16
LCIV Diversified Growth	Diversified growth fund	Baillie Gifford	627	665	8	15/02/16
LCIV Absolute Return	Diversified growth fund	Ruffer	854	889	10	21/06/16
LCIV Real Return	Diversified growth fund	Newton	182	190	2	16/12/16
LCIV MAC	Fixed Income	CQS	639	700	10	31/05/18
LCIV Global Bond	Fixed Income	PIMCO	167	174	2	30/11/18
Total			**7,447**	**8,203**		

Over the quarter to 31 March 2019, one London Borough client left the UK Equity Fund, managed by Majedie. The Global Alpha Growth Fund (managed by Baillie Gifford) and the MAC Fund (Managed by CQS) added one new London Borough each to their client lists. No new sub-funds were launched over the quarter.

6 LCIV – UK Equity

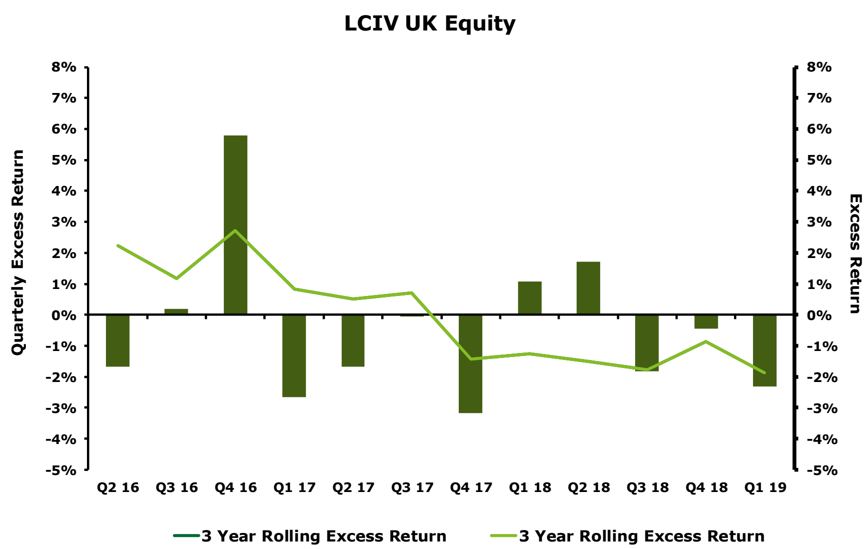
Majedie was appointed to manage an actively managed segregated UK equity portfolio, held as a sub-fund under the London CIV platform from 18 May 2017. The manager's remuneration is a combination of a tiered fixed fee, based on the value of assets and a performance related fee of 20% of the outperformance which is payable when the excess return over the FTSE All Share +2% p.a. target benchmark over a rolling three year period is more than 1% p.a.

6.1 Active UK Equity – Investment Performance to 31 March 2019

	Last Quarter (%)	One Year (%)	Two Years (% p.a.)(1)	Three Years (% p.a.)	Five Years (% p.a.)
Majedie – Gross of fees	7.3	3.9	0.9	8.0	5.6
Net of fees(1)	7.1	3.3	0.3	7.5	5.1
Benchmark	9.4	6.4	3.7	9.4	6.0
Target	9.9	8.4	5.7	11.4	8.0
Net performance relative to Benchmark	-2.3	-3.1	-3.4	-1.9	-0.9

Source: London CIV

(1) Estimated by Deloitte



Majedie underperformed its benchmark by 2.3% on a net of fees basis over the quarter to 31 March 2019. Over the one year and three year periods to 31 March 2019, the Fund underperformed its benchmark by 3.1% and 1.9% p.a. respectively on a net of fees basis.

The Fund's low economic sensitivity to the UK equity market over a period of strong market resurgence was detrimental to relative performance over the quarter.

Energy holdings within the Fund performed well, with all energy stocks in the portfolio delivering positive returns over the quarter including BP and Royal Dutch Shell. The Fund's position to food retailers in the UK proved to be both beneficial and detrimental to the Fund over the quarter, with strong performance from Tesco offset by Sainsbury following the collapse of a merger with Asda.

6.2 Performance Analysis

The top 10 holdings in the UK Equity strategy account for c. 47.3% of the Fund and are detailed below.

Top 10 holdings as at 31 March 2019	Proportion of Majedie Fund
BP	8.3%
Royal Dutch Shell	7.8%
Majedie UK Smaller Companies	7.0%
Tesco	5.6%
GlaxoSmithKline	4.7%
HSBC	3.1%
Orange	3.0%
WM Morrison	2.9%
Pearson	2.6%
Centrica	2.4%
Total	**47.3%**

Note: The numbers in this table may not sum due to rounding.
Source: London CIV.

The tables below show the top 5 and bottom 5 contributors to performance over the quarter to 31 March 2019.

Top 5 contributors as at 31 March 2019	Contribution (bps)
BP	+1.04
Tesco	+1.03
Majedie UK Smaller Companies	+0.38
Royal Dutch Shell	+0.37
GlaxoSmithKline	+0.37

The Majedie UK Smaller Companies allocation returned a negative 30bps to performance over the first quarter of 2019. This holding has been a source of underperformance for the Fund for the last 18 months, during which time the allocation to the sleeve has fallen from c. 12% to c. 7%. The reduction in weighting to the UK Smaller Companies holding during a period of negative performance has led to a positive contribution attributed to the allocation over the first quarter of 2019.

Top 5 detractors as at 31 March 2019	Contribution (bps)
Centrica	-0.44
Pearson	-0.27
Vodafone Group	-0.17
Sainsbury	-0.16
BT Group	-0.10

7 Legal and General – World Low Carbon Equity

Legal and General Investment Management ("LGIM") was appointed on 18 December 2018 to manage a low carbon portfolio with the aim of replicating the performance of the MSCI World Low Carbon Target Index. The manager has an annual management fee, in addition to On Fund Costs.

7.1 World Low Carbon Equity – Investment Performance to 31 March 2019

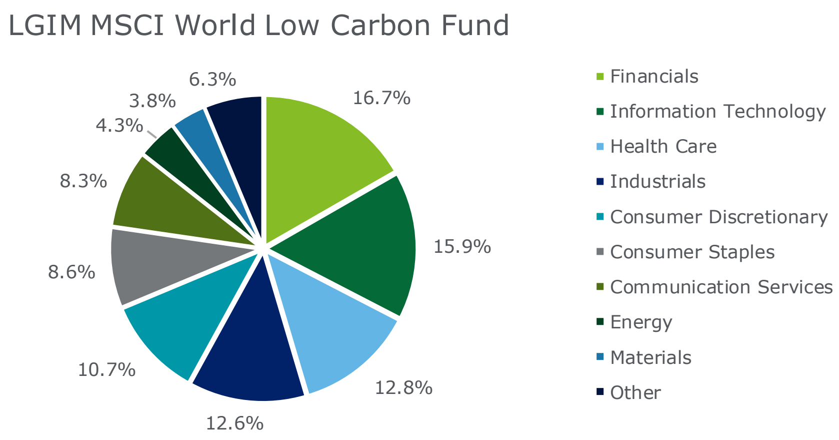
	Last Quarter (%)
LGIM – Gross of fees	10.1
Net of fees(1)	10.1
Benchmark (MSCI World Low Carbon Target)	10.2
MSCI World Equity Index	10.1
Net Performance relative to Benchmark	0.0

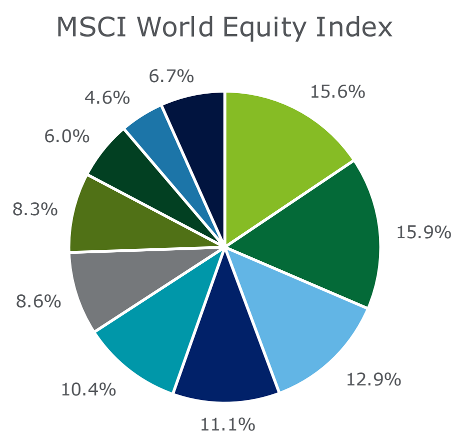
Source: LGIM. Relative performance may not tie due to rounding.
(1) Estimated by Deloitte

The LGIM MSCI World Low Carbon Target Index Fund slightly underperformed its benchmark on a net of fees basis over the quarter to 31 March 2019, delivering 10.1%. The low carbon fund successfully tracked the MSCI World Equity Index over the same period.

7.2 Portfolio Sector Breakdown at 31 March 2019

The below charts compare the relative weightings of the sectors in the LGIM MSCI World Low Carbon Target Fund and the MSCI World Equity Index.





The LGIM MSCI Low Carbon Target Fund has a larger allocation to financials and industrials than the MSCI World Equity Index, whilst the lower allocation to energy and materials represents the low carbon nature of the Fund.

8 LCIV – Absolute Return

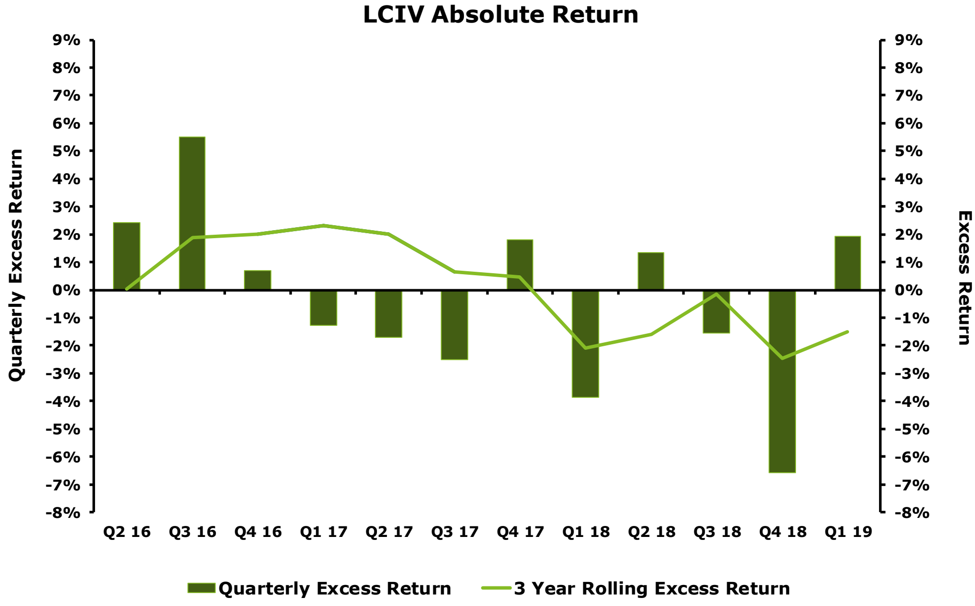
Ruffer was appointed to manage an absolute return mandate, held as a sub-fund under the London CIV platform from 21 June 2016, with the aim of outperforming the 3 month Sterling LIBOR benchmark by 4% p.a. The manager has a fixed fee based on the value of assets.

8.1 Dynamic Asset Allocation – Investment Performance to 31 March 2019

	Last Quarter (%)	One Year (%)	Two Years (% p.a.)(1)	Three Years (% p.a.)	Five Years (% p.a.)
Ruffer - Gross of fees	3.3	0.4	-0.4	3.9	4.4
Net of fees(1)	3.1	-0.4	-1.2	3.0	3.6
Benchmark / Target	1.2	4.8	4.6	4.6	4.6
Net performance relative to Benchmark	1.9	-5.2	-5.8	-1.5	-1.0

Source: London CIV. Relative performance may not tie due to rounding.

(1) Estimated by Deloitte



Ruffer outperformed its benchmark over the first quarter of 2019, delivering a positive return of 3.1% on a net of fees basis and outperforming its Libor +4% benchmark by 1.9%. Over the twelve month and annualised 3 year periods to 31 March 2019, Ruffer underperformed the benchmark by 5.2% and 1.5% p.a. respectively.

Following a disappointing fourth quarter of 2018, the LCIV Absolute Return Fund provided positive returns over the quarter to 31 March 2019 as a result of the Fund's inflation-linked bond position and the equity portfolio, particularly from cyclical industries where stocks recovered most of the losses from the previous quarter.

The Fund's exposure to US inflation-linked bonds was the largest contributor to performance, driven by higher inflation expectations from the market following the actions of the Fed. Currency positioning was also a positive contributor to performance over the quarter, with the Fund adding to its Euro exposures and substantially reducing its US dollar exposure.

9 Partners Group – Multi Asset Credit

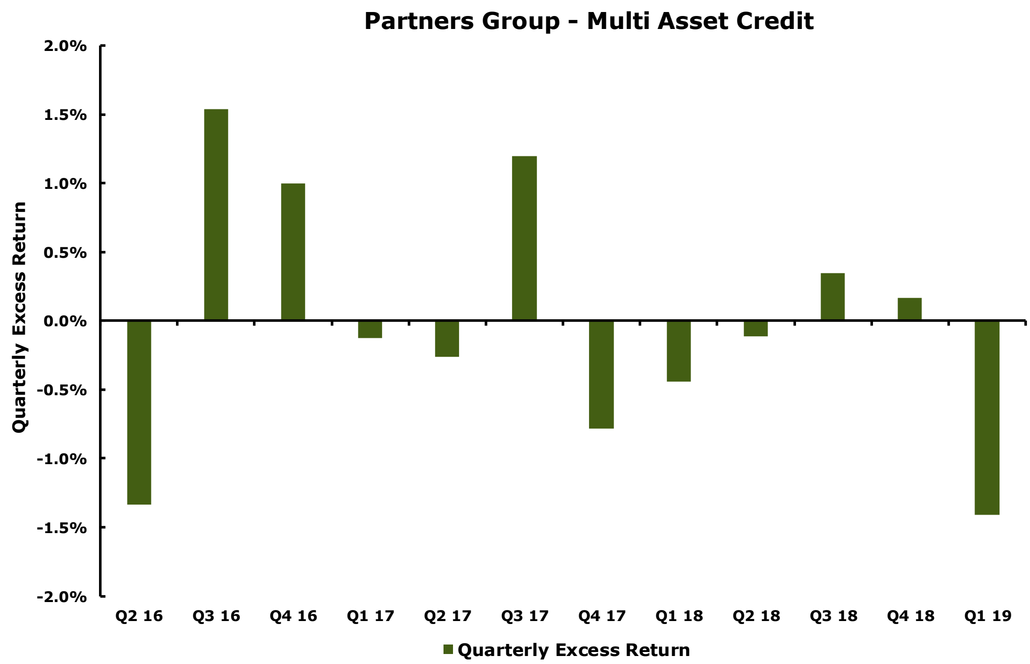
Partners Group was appointed to manage a multi asset credit mandate with the aim of outperforming the 3 month Sterling LIBOR benchmark by 4% p.a. The manager has an annual management fee and performance fee.

9.1 Multi Asset Credit - Investment Performance to 31 March 2019

	Last Quarter (%)	One Year (%)	Two Years (% p.a.)	Three Years (% p.a.)
Partners Group MAC - Gross of fees	0.0	4.6	4.8	5.3
Net of fees[(1)]	-0.2	3.8	3.9	4.5
Benchmark / Target	1.2	4.8	4.6	4.6
Net performance relative to Benchmark	-1.4	-1.1	-0.7	-0.1

Source: Northern Trust. Relative performance may not tie due to rounding.

(1) Estimated by Deloitte



Over the first quarter of 2019, with the Fund in the process of distributing earnings back to investors, the Partners Multi-Asset Credit mandate underperformed its target by 1.4% on a net of fees basis.

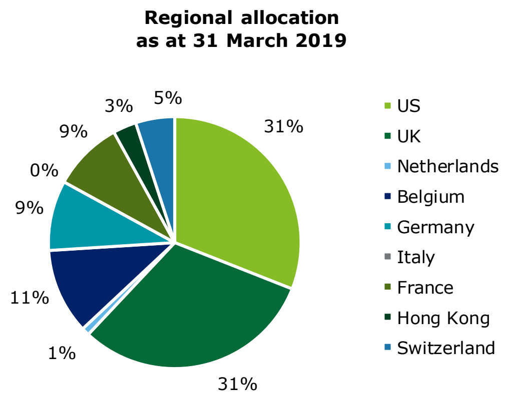
The Fund made two further distributions over the quarter in January and March, for c. £5.3m and c. £8.3m respectively. A further distribution was announced post quarter-end in April 2019 also for c. £8.3m.

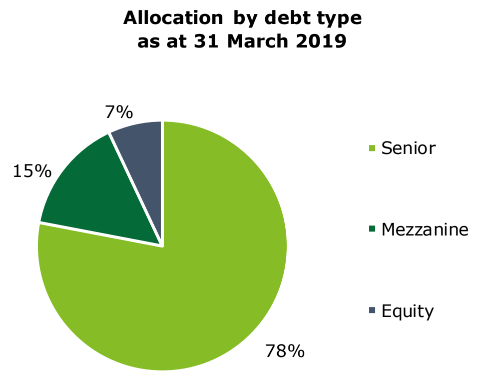
Over the 12 month period to 31 March 2019, the Fund delivered a positive return of 3.8% net of fees, underperforming its target by 1.1%.

Over the longer three year period, the Fund underperformed its target on a net of fees basis by 0.1%, delivering a positive return of 4.5%.

9.2 Asset Allocation

The charts below show the regional split of the Fund as at 31 March 2019.





Note: Based on information provided by Partners Group.

The table below shows details of the Fund's five largest holdings based on net asset value as at 31 March 2019.

Investment	Description	Type of Debt	Tranche	Maturity Date	Current IRR (%)	NAV (£m)	% of NAV
AS Adventure	Large European specialist multi-brand outdoor retail group	Corporate	First Lien	28 Apr 2022	5.5	13.9	11.2%
IDEMIA	Security and identity solutions company	Corporate	Mezzanine	31 May 2027	12.2	11.3	9.2%
Affordable Care, Inc.	US dental support organisation	Corporate	Second Lien	22 April 2023	2.4	4.6	8.8%
		Corporate	Second Lien	22 April 2023	11.8	6.3	
Sabre Industries	US infrastructure products and services provider	Corporate	First Lien	29 May 2022	6.7	9.9	8.0%
Survitec Group, Ltd	UK Manufacturer of personal survival products	Corporate	First Lien	14 March 2022	3.7	8.8	7.1%

Note: Information provided by Partners Group. Current IRR is net of cost and fees of the investment partner but gross of Partners Group fees. For investments with a holding period less than 12 months, the IRR is not annualised.

9.3 Fund Activity

To date, the Fund has made investments in 54 companies, of which 34 have been fully realised as two further realisations took place during the first quarter. The Fund's 3 year investment period ended in July 2017 and, therefore, any investments realised have subsequently been repaid to investors. As a result, the distribution rate has been higher since, and there were two further distribution made during the quarter.

Most notably in February 2019, the MAC Fund realised its full debt investment in Sivantos, a global hearing aid manufacturer, as part of the merger that took place between Sivantos and Widex. Partners Group had held the investment since 2015, and over the holding period since Sivantos' revenue has grown at a rate of 10% p.a.

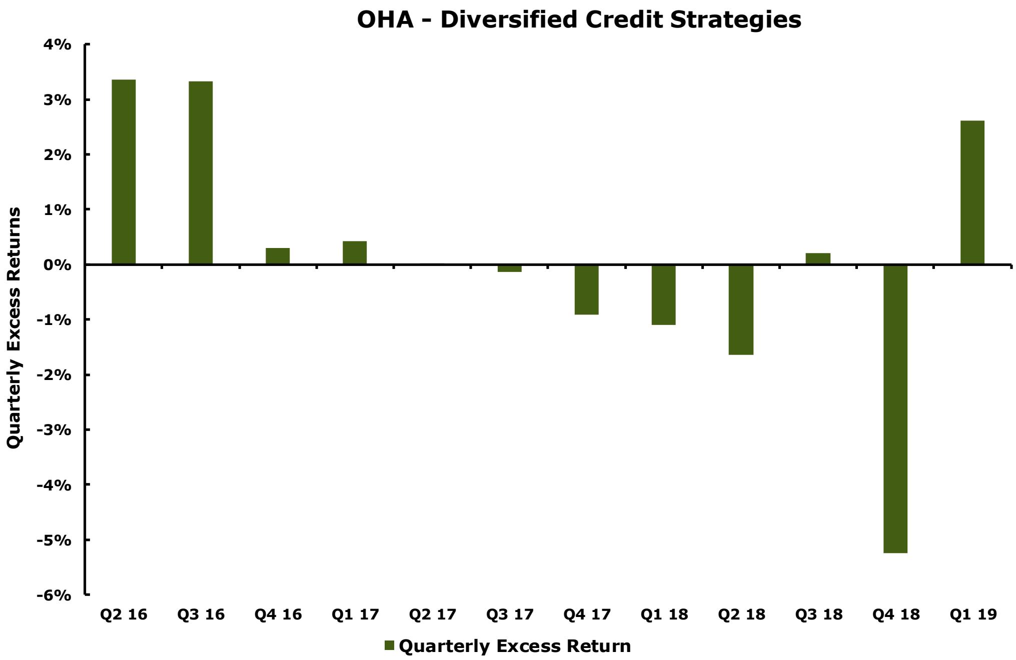
10 Oak Hill Advisors – Diversified Credit Strategies Fund

Oak Hill Advisors was appointed to manage a multi asset credit mandate with the aim of outperforming the 3 month Sterling LIBOR benchmark by 4% p.a. The manager has an annual management fee and performance fee.

10.1 Diversified Credit Strategies - Investment Performance to 31 March 2019

	Last Quarter (%)	One Year (%)	Two Years (%)	Three Years (% p.a.)
OHA – Gross of fees	4.0	1.1	2.0	5.6
Net of fees[(1)]	3.8	0.5	1.4	4.9
Benchmark / Target	1.2	4.8	4.6	4.6
Net Performance relative to Benchmark	2.6	-4.3	-3.3	0.3

Source: Northern Trust. Relative performance may not tie due to rounding.
(1) Estimated by Deloitte



The Diversified Credit Strategies Fund outperformed its target by 2.6% over the quarter to 31 March 2019, returning 3.8% on a net of fees basis. The Fund underperformed a blended benchmark of high yield and leveraged loans by 1.0% over the first quarter of 2019, with the Diversified Credit Strategies Fund having a lower allocation to high yield than the blended benchmark over a period of strong high yield performance.

Over the year to 31 March 2019, the Fund underperformed its target by 4.3%. This followed poor performance in the high yield and leveraged loans space over the fourth quarter of 2018. Over the longer three year period to 31 March 2019, the Fund has delivered a positive return of 4.9% p.a. on a net of fees basis, outperforming its target by 0.3%.

11 Partners Group – Direct Infrastructure

Partners Group was appointed to manage a global infrastructure mandate with the aim of outperforming the 3 month Sterling LIBOR benchmark by 8% p.a. The manager has an annual management fee and performance fee.

11.1 Direct Infrastructure - Investment Performance to 31 March 2019

Activity

During the first quarter of 2019, the Fund added one new investment to its current portfolio. The Fund acquired the Greenlink Interconnector, a subsea power interconnector between Great Britain and Ireland, during March 2019.

As at 31 March 2019, 33.4% of cash called is active in the portfolio.

Capital Calls and Distributions
<u>20 March</u>

- The Fund issued its 19th capital call, drawing down an additional c. 3.7% (€40m).
- Total drawn down following this call was c. 38.6%.

Pipeline

Partners Group currently has three opportunities in its near-term investment pipeline:
- An Australian transportation operator, a joint investment with an experienced partner;
- A global data centre platform based in North America and Europe; and
- A US rail network, a domestic rail network and railcar repair services company with an expansive location mix.

Investments Held

The table below shows a list of the investments held by the Partners Group Direct Infrastructure Fund as at 31 March 2019.

Investment	Description	Type	Sector	Country	Commitment Date
Fermaca	Gas infrastructure operator based in Mexico.	Lead	Energy	Mexico	July 2015
Silicon Ranch	Solar platform based in US	Lead	Solar Power	USA	April 2016
Axia NetMedie	Internet and data network provider based in Canada and France	Lead	Communication	Canada & France	July 2016
Merkur Offshore	Wind farm based in German North Sea.	Lead	Wind Power	Germany	August 2016
Green Island Renewable Solar Platform	Solar power platform in Taiwan.	Lead	Solar Power	Taiwan	September 2016
High Capacity Metro Trains PPP	Delivery and maintenance of rolling stock for Australian State government.	Co-lead	Transportation	Australia	November 2016
USIC	Utility location services	Lead	Utilities	USA	August 2017
Arcanum Infrastructure	Develops and acquires infrastructure assets to supply strategic materials	Lead	Chemical Infrastructure	North America	tbc
Borssele III/IV	Wind farm based in Netherlands	Lead	Wind Power	Netherlands	tbc
Grassroots Renewable Energy Platform	Wind/solar/energy storage platform	Lead	Renewable Energy	Australia	tbc
Murra Warra Wind Farm	Onshore windfarm	Lead	Renewable Energy	Australia	tbc
Superior Pipeline Company	LNG pipeline platform	Co-lead	Energy Infrastructure	North America	tbc
Techem AG	Energy metering services provider	Lead	Infrastructure Services	Germany	tbc
Greenlink Interconnector	Subsea Power Interconnector	Lead	Energy Infrastructure	Western Europe	March 2019

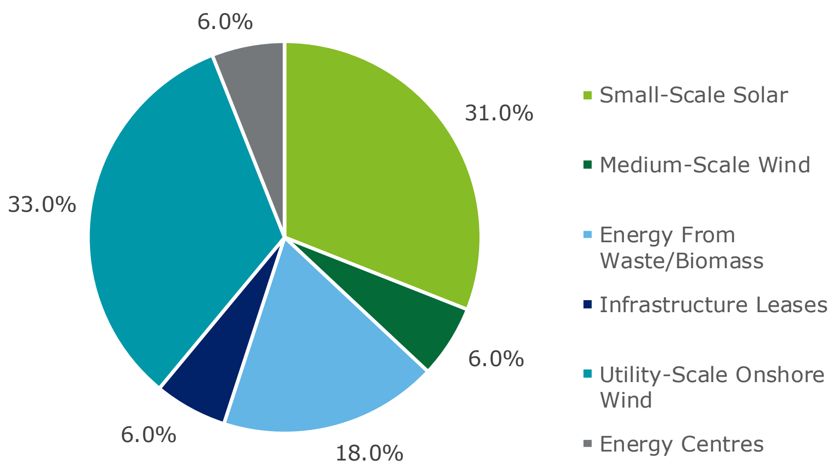
12 Aviva Investors – Infrastructure Income

Aviva Investors was appointed to manage an infrastructure income mandate with the aim of outperforming the 3 month Sterling LIBOR benchmark by 6% p.a. The manager has an annual management fee and performance fee.

12.1 Infrastructure Income - Investment Performance to 31 December 2018

Sector Breakdown

The chart below shows the split of the portfolio by sector.



Source: Aviva Investors.

Small-scale solar and utility-scale onshore wind make up c. 64% of the portfolio.

Holdings

The top 10 holdings in the Infrastructure Income Fund account for c. 59.1% of the Fund and are detailed below.

Top 10 holdings as at 31 December 2018	Asset	Proportion of Fund
Brockloch Rig Wind Farm	Utility-scale Onshore Wind	10.0%
Minnygap Energy	Utility-scale Onshore Wind	5.9%
Turncole Wind Farm	Utility-scale Onshore Wind	5.9%
Aviva Investors Energy Centres No. 1	Energy Centres	5.7%
Aviva Investors REaLM Infrastructure No. 4	Infrastructure Leases	5.6%
EES Operations 1	Small-scale Solar PV	5.5%
HomeSun	Small-scale Solar PV	5.3%
Biomass UK No. 1	Biomass	5.2%
Biomass UK No. 2	Biomass	5.2%
Biomass UK No. 3	Biomass	4.8%
Total		**59.1%**

Note: The numbers in this table may not sum due to rounding.
Source: Aviva Investors.

Pipeline

As at 31 March 2019, the Fund had £179.5m in undrawn commitments, with Aviva estimating that this will continue to be deployed over the calendar year. Aviva currently has a "priority pipeline", representing transactions which the Fund has exclusivity on, are in due diligence or are strongly positioned due to Aviva's leading position in the relevant sector or relationship with the opportunity partner. The opportunities within the priority pipeline amount to c. £337m as at 31 December 2018 and are expected to reach a closing within 9-12 months, with assets in the energy from waste sector (c. 70%) and infrastructure leases (c. 19%).

During the first quarter of 2019, the Fund completed two transactions totaling c. £11.5m. Coventry University Energy Centre transaction was completed at a value of c. £6.0m, whilst three small infrastructure leases were completed at a value of c. £5.5m.

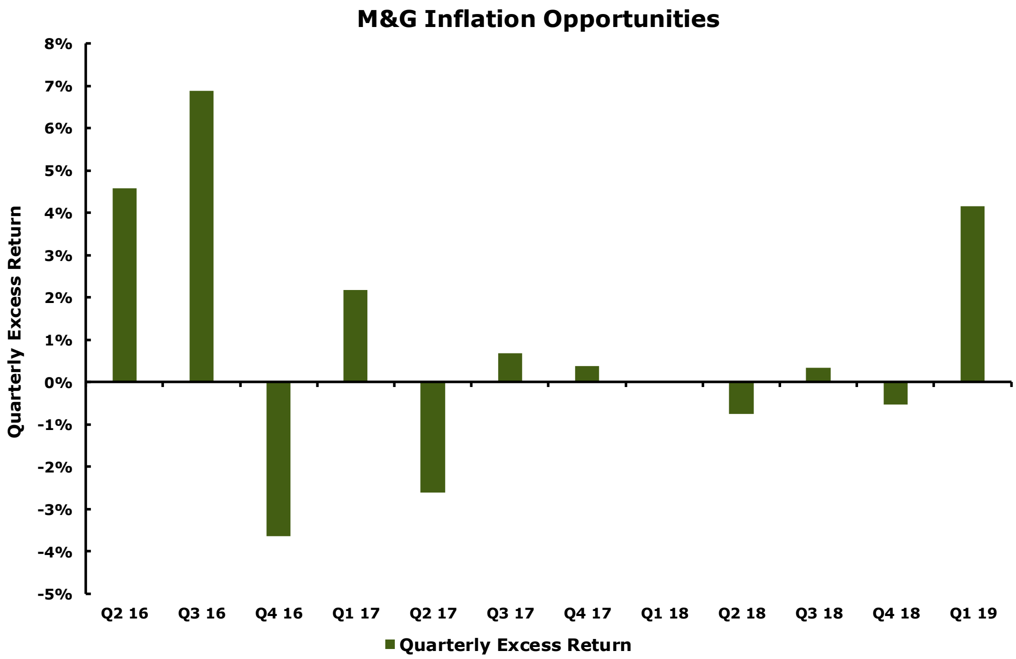
13 M&G – Inflation Opportunities

M&G was appointed to manage an inflation opportunities mandate with the aim of outperforming the RPI benchmark by 2.5% p.a. The manager has an annual management fee which is calculated based on the underlying assets

13.1 M&G Inflation Opportunities - Investment Performance to 31 March 2019

	Last Quarter (%)	One Year (%)	Two Years (% p.a.)	Three Years (% p.a.)
M&G Inflation Opportunities – Gross of fees	4.7	8.6	6.5	9.8
Net of fees(1)	4.6	8.3	6.2	9.4
Benchmark / Target	0.4	4.9	5.4	5.5
Net Performance relative to Benchmark	4.2	3.3	0.8	4.0

Source: Northern Trust. Relative performance may not tie due to rounding.



The Inflation Opportunities Fund outperformed its benchmark by 4.2% over the quarter to 31 March 2019 on a net of fees basis, returning 4.6% in absolute terms. The Fund was ahead of target over the year and three year periods to 31 March 2019 as the Fund delivered positive returns of 8.3% and 9.4% p.a. respectively on a net of fees basis, outperforming the benchmark by 3.3% and 4.0% p.a. respectively.

The Fund's exposure to long lease property remained at c. 38% over the quarter to 31 March 2019, with long lease property remaining the largest component of the portfolio. The index-linked gilts exposure within the portfolio decreased to c. 22% over the quarter, whilst income strips exposure increased to c. 26% and ground rents exposure remained at c. 11%.

14 Aberdeen Standard Investments – Long Lease Property

Aberdeen Standard Investments was appointed to manage a long lease property mandate with the aim of outperforming the FT British Government All Stocks Index benchmark by 2.0% p.a. The manager has an annual management fee.

14.1 Long Lease Property - Investment Performance to 31 March 2019

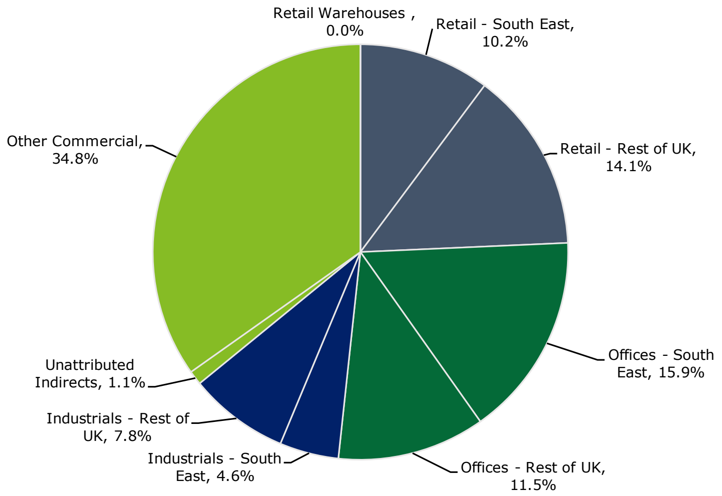
	Last Quarter (%)	One Year (%)	Two Years (% p.a.)	Three Years (% p.a.)
ASI Long Lease Property – Gross of fees	1.1	6.9	8.7	8.1
Net of fees(1)	1.0	6.4	8.1	7.6
Benchmark / Target	3.9	5.8	4.1	5.6
Net Performance relative to Benchmark	-2.9	0.6	4.0	2.0

Source: Northern Trust. Relative performance may not tie due to rounding.

The ASI Long Lease Property Fund has delivered a net of fees return of 1.0% over the first quarter of 2019, underperforming the FTSE Gilt All Stocks Index + 2% benchmark by 2.9%.

14.2 Portfolio Holdings

The sector allocation in the Long Lease Property Fund as at 31 March 2019 is shown in the graph below.



Over the quarter, the fund's allocation to the office sector increased from 26.4% to 27.4% as at 31 March 2019. The holdings in both the retail and other commercial sectors reduced by 0.7% and 0.2% respectively to 24.3% and 34.8% respectively at quarter end.

The table below shows details of the top ten tenants in the fund measured by percentage of net rental income:

Tenant	% Net Income
Tesco	8.1
Whitbread	6.1
Marston's	4.8
Sainsbury's	4.8
Asda	4.2
Salford University	3.8
QVC	3.8
Save the Children	3.7
Lloyds Bank	3.7
Park Holidays UK Limited	3.5
Total	**46.5 ***

*Total may not equal sum of values due to rounding

The top 10 tenants contributed 46.5% of the total net income into the fund. Supermarkets continue to make up a significant part of the fund with Tesco, Sainsbury's and Asda contributing 17.1% to the fund's total net rental income as at 31 March 2019.

The fund's average unexpired lease term decreased over the quarter from 26.4 years to 26.1 years. The proportion of income with fixed, CPI or RPI rental increases increased by 0.3% to 90.7% over the quarter, as a result of the new inflation-linked acquisitions.

14.3 Sales and Purchases

Over the first quarter of 2019:

- The fund exchanged contracts for a car storage facility in Immingham, North Lincolnshire, which has 41 acres of land, for c. £23.9m. This represents a net initial yield of 5.4%, subject to 5-yearly RPI rent reviews capped at 9% with a 25 year lease.
- The fund finalised the purchase of St James Place, Cirencester, on a 23.5 year term for c. £47.4m. The purchase of St James Place will provide a net initial yield of 4.0% and is subject to RPI-linked rent reviews with a cap of 5%.
- The fund's Dartford based distribution centre reached completion, triggering the final payment of the total c. £21.5m to the developer. The centre is pre-let to Berendsen UK Ltd for a 25 year term, with a net initial yield of 3.9% and a 5-yearly RPI-linked rent review subject to a 10% cap.

Appendix 1 – Fund and Manager Benchmarks

The tables in this Appendix detail the benchmarks and outperformance targets, for the Total Fund and each individual manager.

Total Fund
Inception: 31 December 1999.

Manager	Asset Class	Allocation	Benchmark	Inception Date
Majedie	UK Equity	15.0%	FTSE All-Share Index +2% p.a. over three year rolling periods	31/08/05
LGIM	Low Carbon Target	30.0%	MSCI World Low Carbon Target Index	18/12/18
Ruffer	Dynamic Asset Allocation	10.0%	3 Month Sterling LIBOR +4% p.a.	31/07/08
PIMCO	Global Bond	10.0%	Barclays Global Aggregate – Credit Index Hedged (GBP)	Post quarter end
Invesco	Private Equity	0.0%	n/a	30/09/09
Unigestion	Private Equity	0.0%	n/a	30/09/09
Partners Group	Multi Asset Credit	5.0%	3 Month Sterling LIBOR +4% p.a.	28/01/15
Oak Hill Advisors	Multi Asset Credit	7.5%	3 Month Sterling LIBOR +4% p.a.	01/05/15
Partners Group	Infrastructure Fund	5.0%	3 Month Sterling LIBOR +8% p.a.	31/08/2015
Aviva Investors	Infrastructure Income Fund	2.5%	FT British Government Index-Linked All Stocks Index +2.0%	23/05/2018
M&G	Inflation Opportunities	10.0%	RPI +2.5%	01/05/15
Aberdeen Standard Investments	Long Lease Property	5.0%	FT British Government All Stocks Index +2.0%	09/04/15
	Total	**100.0%**		

Appendix 2 – Manager Ratings

Based on our manager research process, we assign ratings to the investment managers for specific products or services. The ratings are based on a combination of quantitative and qualitative factors, where the inputs for the qualitative factors come from a series of focused meetings with the investment managers. The ratings reflect our expectations of the future performance of the particular product or service, based on an assessment of:

- The manager's business management;
- The sources of ideas that go to form the portfolio ("alpha generation");
- The process for including the ideas into the portfolio ("alpha harnessing"); and
- How the performance is delivered to the clients.

On the basis of the research and analysis, managers are rated from 1 (most positive) to 4 (most negative), where managers rated 1 are considered most likely to deliver outperformance, net of fees, on a reasonably consistent basis. Managers rated 1 will typically form the basis of any manager selection short-lists.

Where there are developments with an investment manager that cause an element of uncertainty we will make the rating provisional for a short period of time, while we carry out further assessment of the situation.

Appendix 3 – Risk warnings & Disclosures

- Past performance is not necessarily a guide to the future.
- The value of investments may fall as well as rise and you may not get back the amount invested.
- Income from investments may fluctuate in value.
- Where charges are deducted from capital, the capital may be eroded or future growth constrained.
- Investors should be aware that changing investment strategy will incur some costs.
- Any recommendation in this report should not be viewed as a guarantee regarding the future performance of the products or strategy.

Our advice will be specific to your current circumstances and intentions and therefore will not be suitable for use at any other time, in different circumstances or to achieve other aims or for the use of others. Accordingly, you should only use the advice for the intended purpose.

Our advice must not be copied or recited to any other person than you and no other person is entitled to rely on our advice for any purpose. We do not owe or accept any responsibility, liability or duty towards any person other than you.

Deloitte Total Reward and Benefits Limited is authorised and regulated by the Financial Conduct Authority.

Appendix 4 – MiFID II Cost Summary

On 3 January 2018, the Markets in Financial Instruments Directive II ("MiFID II") was introduced. A key component of this legislation is for fund managers to disclose all costs incurred, with the view to increasing transparency.

	Total costs over the year to 31 March 2019 (£'000)	Total costs over the year to 31 March 2019 (%)[1]
London CIV	105	0.01
Majedie	1,045	0.10
Legal & General	58	0.01
Ruffer	928	0.09
Insight	394	0.04
Invesco	5	0.00
Partners Group - MAC	456	0.05
Oak Hill Advisors	820	0.08
Partners Group - Direct Infrastructure	694	0.07
Aviva Investors	149	0.01
M&G	350	0.04
Aberdeen Standard Investments	215	0.02
Northern Trust[2]	107	0.01
Total	**5,327**	**0.53**
Deloitte	106	0.01
Total	**5,433**	**0.54**

(1) As a percentage of total Fund value as at 31 March 2019.

(2) Custodian fees.

Appendix 3: Cashflow Monitoring Position as at 31 March 2019

Pension Fund Current Account Cashflow Actuals and Forecast for period January to December 2019

	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Forecast Annual Total	Forecast Monthly Total
	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s		
	Actual	Actual	Actual	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast		
Balance b/f	**817**	**2,054**	**1,221**	**2,673**	**3,773**	**1,973**	**1,473**	**1,673**	**1,873**	**2,373**	**2,573**	**2,773**	**£000s**	**£000s**
Contributions	2,306	2,190	2,088	9,000	2,100	2,100	2,100	2,100	2,100	2,100	2,100	2,100	**32,384**	**2,699**
Pensions	(2,583)	(2,781)	(2,687)	(2,800)	(2,800)	(2,800)	(2,800)	(2,800)	(2,800)	(2,800)	(2,800)	(2,800)	**(33,250)**	**(2,771)**
Lump Sums	(571)	(487)	(64)	(600)	(600)	(600)	(600)	(600)	(600)	(600)	(600)	(600)	**(6,522)**	**(544)**
Net TVs in/(out)	186	(1,493)	(417)	(300)	(300)	(300)	(300)	(300)	(300)	(300)	(300)	(300)	**(4,424)**	**(369)**
Expenses	(101)	(262)	(82)	(200)	(200)	(200)	(200)	(200)	(200)	(200)	(200)	(200)	**(2,245)**	**(187)**
Net Cash Surplus/(Deficit)	**(763)**	**(2,833)**	**(1,161)**	**5,100**	**(1,800)**	**(1,800)**	**(1,800)**	**(1,800)**	**(1,800**	**(1,800)**	**(1,800)**	**(1,800)**	**(14,058)**	**(1,171)**
Distributions	-	-	2,614	-	-	1,300	-	-	2,300	-	-	1,300	**7,514**	**626**
Net Cash Surplus/(Deficit) including investment income	**(763)**	**(2,833)**	**1,453**	**5,100**	**(1,800)**	**(500)**	**(1,800)**	**(1,800)**	**500**	**(1,800)**	**(1,800)**	**(500)**	**(6,544)**	**(545)**
Withdrawals from Custody Cash	2,000	2,000	-	(4,000)	-	-	2,000	2,000	-	2,000	2,000	-	**8,000**	**667**
Balance c/f	**2,054**	**1,221**	**2,673**	**3,773**	**1,973**	**1,473**	**1,673**	**1,873**	**2,373**	**2,573**	**2,773**	**2,273**	**1,456**	**121**

Current Account Cashflow Actuals Compared to Forecast During the January to March 2019 Quarter

	Jan-19		Feb-19		Mar-19		Jan – Mar 19
	Forecast	Actual	Forecast	Actual	Forecast	Actual	Variance
	£000s	£000s	£000s	£000s	£000s	£000s	£000s
Contributions	2,000	2,306	2,000	2,190	2,000	2,088	584
Pensions	(2,800)	(2,583)	(2,800)	(2,781)	(2,800)	(2,687)	350
Lump Sums	(600)	(571)	(600)	(487)	(600)	(64)	678
Net TVs in/(out)	(200)	186	(200)	(1,493)	(200)	(417)	(1,124)
Expenses	(200)	(101)	(200)	(262)	(200)	(82)	155
Distributions	-	-	-	-	2,500	2,614	114
Withdrawals from Custody Cash	2,000	2,000	2,000	2,000	-	-	-
Total	**200**	**1,237**	**200**	**(833)**	**700**	**1,453**	**756**

Notes on variances during quarter:

- Monthly contributions received in the quarter were slightly higher than previously estimated. Forecasts have been revised to account for this going forward.
- The largest variances were due to lump sums and transfer values. These payments are difficult to forecast but are continually monitored by the Pensions team.
- The fund drew down £4m from the custody account as anticipated during the quarter.
- Contributions forecast for April includes £7m in Employer Deficit Contribution

Pension Fund Custody Invested Cashflow Actuals and Forecast for period January to December 2019

	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Forecast Annual Total
	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s	
	Actual	Actual	Actual	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast	F'cast	
Balance b/f	**25,876**	**64,884**	**27,651**	**25,876**	**23,876**	**23,476**	**23,476**	**25,076**	**25,076**	**26,676**	**26,676**	**28,276**	**£000s**
Sale of Assets	-	85,769	-										**85,769**
Purchase of Assets	(1,306)	(3)	(1,396)		(85,000)								**(87,705)**
Net Capital Cashflows	**(1,306)**	**85,766**	**(1,396)**	**-**	**(85,000)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**(1,936)**
Distributions	1,028		1,900	-	1,400	-	1,400	-	1,400	-	1,400	-	**8,528**
Interest	18	17	77										**112**
Foreign Exchange Gains/Losses	(73)	(53)	(38)										**(145)**
Class Actions	7	-	-										**7**
Net Revenue Cashflows	**2,284**	**(36)**	**1,958**	**-**	**1,400**	**-**	**1,400**	**-**	**1,400**	**-**	**1,400**	**-**	**8,503**
Net Cash Surplus/(Deficit) excluding withdrawals	**(325)**	**85,730**	**562**	**-**	(83,600)	**-**	**1,400**	**-**	**1,400**	**-**	**1,400**	**-**	**6,566**
Withdrawals from Custody Cash	(2,000)	(2,000)	-	4,000	-	-	(2,000)	(2,000)	-	(2,000)	(2,000)	-	**(8,000)**
Balance c/f	**23,551**	**107,281**	**107,843**	**111,843**	**28,243**	**28,243**	**27,643**	**25,243**	**27,043**	**25,043**	**24,443**	**24,443**	**(1,434)**

Notes on Invested Cash Movements

- The Pension Sub-Committee agreed to disinvest from the Insight Bonds strategy in February 2019. The value of the investment at the redemption date was £85.8m. These funds would stay in the Legal & General Liquidity Fund until a new manager was appointed. In March 2019, the Pension Sub-Committee agreed to invest £85m into the LCIV Buy and Maintain strategy under PIMCO's management.
- During the quarter, the following amounts were distributed back to the pension fund:
  - £2.6m from Partners Group Multi Asset Credit Fund
  - £0.1m from the Invesco Private Equity Funds
  - £0.1m from Unigestion Private Equity Funds
- During the quarter, £2.7m was invested as follows:
  - £1.4m capital call into the Partners Group Direct Infrastructure Fund
  - £1.3m reinvestment of dividends from M&G Inflation Opportunities Fund

London Borough of Hammermsmith & Fulham Pension Fund Risk Register - Investment Risk

Risk Group	Risk Ref.	Movement	Risk Description	Impact				Likelihood	Total risk score	Mitigation actions	Revised Likelihood	Net risk score	Reviewed on
				Fund	Employers	Reputation	Total						
Governance	1		That the London Collective Investment Vehicle (LCIV) disbands or the partnership fails to produce proposals/solutions deemed sufficiently ambitious.	5	4	3	12	3	**36**	TREAT - 1) Partners for the pool have similar expertise and like-mindedness of the officers and members involved with the fund, ensuring compliance with the pooling requirements. Ensure that ongoing fund and pool proposals are comprehensive and meet government objectives. Member presence on Shareholder Committee and officer groups.	2	**24**	26/06/2019
Funding	2		Scheme members live longer than expected leading to higher than expected liabilities.	5	5	1	11	2	**22**	The scheme's liability is reviewed at each triennial valuation and the actuary's assumptions are challenged as required. The actuary's most recent longevity analysis has shown that the rate of increase in life expectancy is going down	2	**22**	26/06/2019
Funding	3		Transfers out of the scheme increase significantly due to members transferring their pensions to DC funds to access cash through new pension freedoms.	4	4	2	10	2	**20**	TOLERATE - Monitor numbers and values of transfers out being processed. If required, commission transfer value report from Fund Actuary for application to Treasury for reduction in transfer values. Evidence has shown that members have not been transferring out of the CARE scheme at the previously anticipated rate due to uncertainty in the economic environment	2	**20**	26/06/2019
Funding	4		Employee pay increases are significantly more than anticipated for employers within the Fund.	4	4	2	10	2	**20**	TOLERATE - 1) Fund employers should monitor own experience. 2) Assumptions made on pay and price inflation (for the purposes of IAS19/FRS102 and actuarial valuations) should be long term assumptions. Any employer specific assumptions above the actuary's long term assumption would lead to further review. 3) Employers to made aware of generic impact that salary increases can have upon the final salary linked elements of LGPS benefits (accrued benefits before 1 April 2014).	2	**20**	26/06/2019
Investment	5		Significant volatility and negative sentiment in global investment markets following disruptive politically uncertainty caused by the tradewar been the US and China	5	4	1	10	3	**30**	TREAT- 1) Continued dialogue with investment managers re management of political risk in global developed markets. 2) Investment strategy involving portfolio diversification and risk control. 3) Investment strategy review will follow post actuarial 2019 valuation.	2	**20**	26/06/2019
Funding	6		Price inflation is significantly more than anticipated in the actuarial assumptions: an increase in CPI inflation by 0.1% over the assumed rate will increase the liability valuation by upwards of 1.7%	5	3	2	10	3	**30**	TREAT- 1) The fund holds investment in index-linked bonds (RPI protection which is higher than CPI) and other real assets to mitigate CPI risk. Moreover, equities will also provide a degree of inflation protection.	2	**20**	26/06/2019
Funding	7		Changes to LGPS Scheme moving from Defined Benefit to Defined Contribution	5	3	2	10	2	**20**	TOLERATE - 1) Political power required to effect the change.	2	**20**	26/06/2019
Investment	8		Investment managers fail to achieve benchmark/ outperformance targets over the longer term: a shortfall of 0.1% on the investment target will result in an annual impact of £1.1m.	5	3	1	9	3	**27**	TREAT- 1) The Investment Management Agreements (IMAs)clearly state WCC's expectations in terms of investment performance targets. 2) Investment manager performance is reviewed on a quarterly basis. 3) The Pension Fund Committee should be positioned to move quickly if it is felt that targets will not be achieved. 4) Portfolio rebalancing is considered on a regular basis by the Pension Fund Committee. 5) The Fund's investment management structure is highly diversified, which lessens the impact of manager risk compared with less diversified structures.	2	**18**	26/06/2019

Investment	9		Volatility caused by uncertainty regarding to the withdrawal of the UK from the European Union, with the likelihood of a no-deal exit increasing	4	4	1	9	3	27	TREAT- 1) Officers to consult and engage with advisors and investment managers. 2) Future possibility of looking at move from UK to Global benchmarks on UK Equities and UK Property. 3) Possibility of hedging currency and equity index movements.	2	18	26/06/2019
Investment	10		Increased risk to global economic stability. Outlook deteriorates in advanced economies because of heightened uncertainty and setbacks to growth and confidence, with declines in oil and commodity prices. Leading to tightened financial conditions, reduced risk appetite and raised credit risks. Geo-political risk as a result of events and political uncertainty.	4	3	1	8	3	24	TREAT- 1) Increased vigilance and continued dialogue with managers as to events on and over the horizon. 2) Continued investment strategy involving portfolio diversification and risk control. 3) Investment strategy review will follow post actuarial 2019 valuation.	2	16	26/06/2019
Funding	11		Impact of economic and political decisions on the Pension Fund's employer workforce.	5	2	1	8	2	16	TOLERATE - 1) Barnet Waddingham uses prudent assumptions on future of employees within workforce. Employer responsibility to flag up potential for major bulk transfers outside of the Westminster Fund. The potential for a significant reduction in the workforce as a result of the public sector financial pressures may have a future impact on the Fund. 2) Need to make prudent assumptions about diminishing workforce when carrying out the triennial actuarial valuation.	2	16	26/06/2019
Governance	12		London CIV has inadequate resources to monitor the implementation of investment strategy and as a consequence are unable to address underachieving fund managers.	3	3	2	8	3	24	1) Pension Fund Committee Chair is a member of the Joint member Committee responsible for the oversight of the CIV and can monitor and challenge the level of resources through that forum. Tri-Borough Director of Treasury & Pensions is a member of the officer Investment Advisory Committee which gives the Fund influence over the work of the London CIV. 2) LCIV have recently appointed a new CEO.	2	16	26/06/2019
Operational	13		Procurement processes may be challenged if seen to be non-compliant with OJEU rules. Poor specifications lead to dispute. Unsuccessful fund managers may seek compensation following non compliant process	2	2	3	7	2	14	TOLERATE - Ensure that assessment criteria remains robust and that full feedback is given at all stages of the procurement process.	2	14	26/06/2019
Funding	14		Ill health costs may exceed "budget" allocations made by the actuary resulting in higher than expected liabilities particularly for smaller employers.	4	2	1	7	2	14	TOLERATE - Review "budgets" at each triennial valuation and challenge actuary as required. Charge capital cost of ill health retirements to admitted bodies at the time of occurring. Occupational health services provided by the Council and other large employers to address potential ill health issues early.	2	14	26/06/2019
Funding	15		Impact of increases to employer contributions following the actuarial valuation	5	5	3	13	2	26	TREAT- 1) Officers to consult and engage with employer organisations in conjunction with the actuary. 2) Actuary will assist where appropriate with stabilisation and phasing in processes.	1	13	26/06/2019

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Governance	16		Changes to LGPS Regulations	3	2	1	6	3	18	TREAT - 1) Fundamental change to LGPS Regulations implemented from 1 April 2014 (change from final salary to CARE scheme). 2) Future impacts on employer contributions and cash flows will considered during the 2019 actuarial valuation process. 3) Fund will respond to several ongoing consultation processes. 4) Impact of LGPS (Management of Funds) Regulations 2016 to be monitored. Impact of Regulations 8 (compulsory pooling) to be monitored.	2	12	26/06/2019
Governance	17		Failure to take difficult decisions inhibits effective Fund management	5	3	4	12	2	24	TREAT-1) Officers ensure that governance process encourages decision making on objective empirical evidence rather than emotion. Officers ensure that the basis of decision making is grounded in the Investment Strategy Statement (ISS), Funding Strategy Statement (/FSS), Governance policy statement and Committee Terms of Reference and that appropriate advice from experts is sought	1	12	26/06/2019
Investment	18		Failure to keep up with the pace of change regarding economic, policy, market and technology trends relating to climate change	3	2	1	6	3	18	TREAT- 1) Officers regularly receive updates on the latest ESG policy developments from the fund managers. 2) The Pensions Fund is a member of the Local Authority Pension Fund Forum which engages with companies on a variety of ESG issues including climate change	2	12	26/06/2019
Governance	19		Failure by the audit committee to perfom its governance, assurance and risk management duties	3	2	1	6	3	18	TREAT- 1) Audit Committee performs a statutory requirement for the Pension Fund with the Pension Sub-Committee being a sub-committee of the audit committee. 2) Audit Committee meets regularly where governence issues are regularly tabled.	2	12	26/06/2019
Governance	20		Implementation of proposed changes to the LGPS (pooling) does not conform to plan or cannot be achieved within laid down timescales	3	2	1	6	3	18	TREAT- 1) Officers consult and engage with MHCLG, LGPS Scheme Advisory Board, advisors, consultants, peers, various seminars and conferences. 2) Officers engage in early planning for implementation against agreed deadlines.	2	12	26/06/2019
Funding	21		There is insufficient cash available in the Fund to meet pension payments leading to investment assets being sold at sub-optimal prices to meet pension payments.	5	4	2	11	2	22	TREAT - 1) Cashflow forecast maintained and monitored. Cashflow position reported to sub-committee quarterly. 2) The Fund receives quarterly distributions from some of its investments to help meet its pensions obligations.	1	11	26/06/2019
Funding	22		Mismatching of assets and liabilities, inappropriate long-term asset allocation or investment strategy, mistiming of investment strategy	5	3	3	11	2	22	TREAT- 1) Active investment strategy and asset allocation monitoring from Pension Fund Committee, officers and consultants. 2) Investment strategy review is currently underway with an approved switch from equities to fixed income. 3) Setting of Fund specific benchmark relevant to the current position of fund liabilities. 4) Fund manager targets set and based on market benchmarks or absolute return measures. Overall investment benchmark and out-performance target is fund specific.	1	11	26/06/2019
Financial	23		Financial loss of cash investments from fraudulent activity	3	3	5	11	2	22	TREAT - 1) Policies and procedures are in place which are regularly reviewed to ensure risk of investment loss is minimised. Strong governance arrangements and internal control are in place in respect of the Pension Fund. Internal Audit assist in the implementation of strong internal controls. Fund Managers have to provide annual SSAE16 and ISAE3402 or similar documentation (statement of internal controls).	1	11	26/06/2019
Operational	24		Failure to hold personal data securely in breach of General Data Protection Regulation (GDPR) legislation.	3	3	5	11	2	22	TREAT - 1) Data encryption technology is in place which allow the secure transmission of data to external service providers. 2) Phasing out of holding records via paper files. 3) Pensions Admin (Surrey County Council) manual records are locked daily in a secure safe. 4) WCC IT data security policy adhered to.	1	11	26/06/2019

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Governance	25		Failure to comply with legislation leads to ultra vires actions resulting in financial loss and/or reputational damage.	5	2	4	11	2	22	TREAT - Officers maintain knowledge of legal framework for routine decisions. Eversheds retained for consultation on non-routine matters.	1	11	26/06/2019
Funding	26		Failure of an admitted or scheduled body leads to unpaid liabilities being left in the Fund to be met by others.	5	3	3	11	2	22	TREAT - Transferee admission bodies required to have bonds in place at time of signing the admission agreement. Regular monitoring of employers and follow up of expiring bonds.	1	11	26/06/2019
Operational	27		Inaccurate information in public domain leads to damage to reputation and loss of confidence	1	1	3	5	3	15	TREAT - 1) Ensure that all requests for information (Freedom of Information, member and public questions at Council, etc) are managed appropriately and that Part 2 Exempt items remain so. 2) Maintain constructive relationships with employer bodies to ensure that news is well managed.	2	10	26/06/2019
Governance	28		Inadequate, inappropriate or incomplete investment or actuarial advice is actioned leading to a financial loss or breach of legislation.	5	3	2	10	2	20	TREAT - At time of appointment ensure advisers have appropriate professional qualifications and quality assurance procedures in place. Committee and officers scrutinise and challenge advice provided.	1	10	26/06/2019
Operational	29		Financial failure of third party supplier results in service impairment and financial loss	5	4	1	10	2	20	TREAT - 1) Performance of third parties (other than fund managers) regularly monitored. 2) Regular meetings and conversations with global custodian (Northern Trust) take place. 3) Actuarial and investment consultancies are provided by two different providers.	1	10	26/06/2019
Governance	30		Change in membership of Pension Fund Committee leads to dilution of member knowledge and understanding	2	2	1	5	4	20	TREAT - 1) Succession planning process in place. 2) Ongoing training of Pension Fund Committee members. 3) Pension Fund Committee new member induction programme. 4) Training to be based on the requirements of CIPFA Knowledge and Skills Framework under designated officer.	2	10	26/06/2019
Investment	31		Failure of global custodian or counterparty.	5	3	2	10	2	20	TREAT - At time of appointment, ensure assets are separately registered and segregated by owner. Review of internal control reports on an annual basis. Credit rating kept under review.	1	10	26/06/2019
Operational	32		Financial failure of a fund manager leads to value reduction, increased costs and impairment.	4	3	3	10	2	20	TREAT - 1) Fund is reliant upon current adequate contract management activity. 2) Fund is reliant upon alternative suppliers at similar price being found promptly. 3) Fund is reliant on LGIM as transition manager. 4) Fund has the services of the London Collective Investment Vehicle (LCIV).	1	10	26/06/2019
Investment	33		Global investment markets fail to perform in line with expectations leading to deterioration in funding levels and increased contribution requirements from employers.	5	3	2	10	2	20	TREAT - 1) Proportion of total asset allocation made up of equities, bonds, property funds and fixed income, limiting exposure to one asset category. 2) The investment strategy is continuously monitored and periodically reviewed to ensure optimal risk asset allocation. 3) Actuarial valuation and strategy review take place every three years post the actuarial valuation. 4) IAS19 data is received annually and provides an early warning of any potential problems. 5) The actuarial assumption regarding asset outperformance is regarded as achievable over the long term when compared with historical data.	1	10	26/06/2019
Governance	34		Officers do not have appropriate skills and knowledge to perform their roles resulting in the service not being provided in line with best practice and legal requirements. Succession planning is not in place leading to reduction of knowledge when an officer leaves.	4	3	3	10	2	20	TREAT - Person specifications are used at recruitment to appoint officers with relevant skills and experience. Training plans are in place for all officers as part of the performance appraisal arrangements. Shared service nature of the pensions team provides resilience and sharing of knowledge.	1	10	26/06/2019

Governance	35	↔	Failure to comply with legislative requirements e.g. ISS, FSS, Governance Policy, Freedom of Information requests	3	3	4	10	2	**20**	TREAT - 1) Publication of all documents on external website. 2) Managers expected to comply with ISS and investment manager agreements. 3) Local Pension Board is an independent scrutiny and assistance function. 4) Annual audit reviews.	1	**10**	26/06/2019
Funding	36	↔	Scheme matures more quickly than expected due to public sector spending cuts, resulting in contributions reducing and pension payments increasing.	5	3	1	9	2	**18**	TREAT - Review maturity of scheme at each triennial valuation. Deficit contributions specified as lump sums, rather than percentage of payroll to maintain monetary value of contributions. Cashflow position monitored monthly.	1	**9**	26/06/2019
Governance	37	↔	Committee members do not have appropriate skills or knowledge to discharge their responsibility leading to inappropriate decisions.	4	3	2	9	2	**18**	TREAT - External professional advice is sought where required. Knowledge and skills policy in place (subject to Committee Approval)	1	**9**	26/06/2019
Operational	38	↓	Insufficient attention paid to environmental, social and governance (ESG) issues, leading to reputational damage.	3	2	4	9	2	**18**	TREAT-1) Review ISS in relation to published best practice (e.g. Stewardship Code) 2) The Fund currently holds investments in the MSCI Low Carbon and Aviva Renewables Infrastructure Fund ISS. 3) The Fund is a member of the Local Authority Pension Fund Forum (LAPFF), which raises awareness of ESG issues and facilitates engagement with fund managers and corporate company directors.	1	**9**	26/06/2019
Financial	39	↓	Inaccurate cash flow forecasts or drawdown payments lead to shortfalls on cash levels and borrowing becomes necessary to ensure that funds are available	3	4	2	9	2	**18**	TREAT - 1) Borrowing limits with banks are set at levels that are more than adequate should cash be required at short notice. 2) Cashflow analysis of pension fund undertaken at regular intervals.	1	**9**	26/06/2019
Regulation	40	↔	Loss of flexibility to engage with Fund Managers that the fund has not 'opted up' with regard to new products, resulting in reduced knowledge about investment opportunities that may benefit the fund. (The Fund is a retail client to counterparties unless opted up)	5	2	2	9	2	**18**	TREAT - More reliance on investment advisor to keep Officers and Committee updated. Officers are considering other financial institution outside of the current mandates to 'opt up' with. Maintaining up to date information about the fund on relevant platforms. Fund can opt up with prospective clients.	1	**9**	26/06/2019
Governance	41	↔	Failure to comply with recommendations from the Local Pension Board, resulting in the matter being escalated to the scheme advisory board and/or the pensions regulator	1	3	5	9	2	**18**	TREAT - 1) Ensure that an cooperative, effective and transparent dialogue exists between the Pension Fund Committee and Local Pension Board.	1	**9**	26/06/2019
Regulation	42	↔	Loss of 'Elective Professional Status' with any or all of existing Fund managers and counterparties resulting in reclassification of fund from professional to retail client status impacting Fund's investment options.	4	2	2	8	2	**16**	TREAT - Keep quantitative and qualitative requirements under review to ensure that they continue to meet the requirements. There is a training programme and log in place to ensure knowledge and understanding is kept up to date. Existing and new Officer appointments subject to requirements for professional qualifications and CPD.	1	**8**	26/06/2019
Funding	43	↔	The level of inflation and interest rates assumed in the valuation may be inaccurate leading to higher than expected liabilities.	4	2	1	7	2	**14**	TREAT - Review at each triennial valuation and challenge actuary as required. Growth assets and inflation linked assets in the portfolio should rise as inflation rises.	1	**7**	26/06/2019

Regulation	44		Pensions legislation or regulation changes resulting in an increase in the cost of the scheme or increased administration.	4	2	1	7	2	**14**	TREAT - Maintain links with central government and national bodies to keep abreast of national issues. Respond to all consultations and lobby as appropriate to ensure consequences of changes to legislation are understood.	1	**7**	26/06/2019

London Borough of Hammersmith and Fulham Pension Fund Risk Register - Administration Risk														
Risk Group	Risk Ref.	Movement	Risk Description	Impact				Likelihood	Total risk score	Mitigation actions	Revised likelihood	Total risk score	Reviewed on
				Fund	Employers	Reputation	Total						
Admin	1		Structural changes in an employer's membership or an employer fully/partially closing the scheme. Employer bodies transferring out of the pension fund or employer bodies closing to new membership. An employer ceases to exist with insufficient funding or adequacy of bond placement.	5	3	1	9	3	**27**	TREAT 1) Administering Authority actively monitors prospective changes in membership. 2) Maintain knowledge of employer future plans. 3) Contributions rates and deficit recovery periods set to reflect the strength of the employer covenant. 4) Periodic reviews of the covenant strength of employers are undertaken and indemnity applied where appropriate. 5) Risk categorisation of employers planned to be part of 2019 actuarial valuation. 6) Monitoring of gilt yields for assessment of pensions deficit on a termination basis.	2	**18**	26/06/2019
Admin	2		Concentration of knowledge in a small number of officers and risk of departure of key staff.	2	2	3	7	3	**21**	TREAT 1) Practice notes in place. 2) Development of team members and succession planning improvements to be implemented. 3) Officers and members of the Pension Fund Committee will be mindful of the proposed CIPFA Knowledge and Skills Framework when setting objectives and establishing training needs.	2	**14**	26/06/2019
Admin	3		Incorrect data due to employer error, user error or historic error leads to service disruption, inefficiency and conservative actuarial assumptions.	4	4	3	11	2	**22**	TREAT 1) Update and enforce admin strategy to assure employer reporting compliance. 2) Implementation and monitoring of a Data Improvement Plan as part of the Service Specification between the Fund and Orbis. TOLERATE 1) Northern Trust provides 3rd party validation of performance and valuation data. Admin team and members are able to interrogate data to ensure accuracy.	1	**11**	26/06/2019
Admin	4		Loss of funds through fraud or misappropriation leading to negative impact on reputation of the Fund as well as financial loss.	3	2	5	10	2	**20**	TREAT 1) Third parties regulated by the FCA and separation of duties and independent reconciliation processes are in place. 2) Review of third party internal control reports. 3) Regular reconciliations of pensions payments undertaken by Pension Finance Team. 4) Periodic internal audits of Pensions Finance and HR Teams.	1	**10**	26/06/2019
Admin	5		Failure of fund manager or other service provider without notice resulting in a period of time without the service being provided or an alternative needing to be quickly identified and put in place.	5	2	2	9	2	**18**	TREAT 1) Contract monitoring in place with all providers. 2) Procurement team send alerts whenever credit scoring for any provider changes for follow up action.	1	**9**	26/06/2019
Admin	6		Non-compliance with regulation changes relating to the pension scheme or data protection leads to fines, penalties and damage to reputation.	3	3	2	8	2	**16**	TREAT 1) The Fund has generally good internal controls with regard to the management of the Fund. These controls are assessed on an annual basis by internal and external audit as well as council officers. 2) Through strong governance arrangements and the active reporting of issues, the Fund will seek to report all breaches as soon as they occur in order to allow mitigating actions to take place to limit the impact of any breaches.	1	**8**	26/06/2019
Admin	7		Failure of financial system leading to lump sum payments to scheme members and supplier payments not being made and Fund accounting not being possible.	1	3	4	8	2	**16**	TREAT 1) Contract in place with HCC to provide service, enabling smooth processing of supplier payments. 2) Process in place for Surrey CC to generate lump sum payments to members as they are due. 3) Officers undertaking additional testing and reconciliation work to verify accounting transactions.	1	**8**	26/06/2019
Admin	8		Inability to respond to a significant event leads to prolonged service disruption and damage to reputation.	1	2	5	8	2	**16**	TREAT 1) Disaster recovery plan in place as part of the Service Specification between the Fund and Surrey County Council 2) Ensure system security and data security is in place 3) Business continuity plans regularly reviewed, communicated and tested 4) Internal control mechanisms ensure safe custody and security of LGPS assets. 5) Gain assurance from the Fund's custodian, Northern Trust, regarding their cyber security compliance.	1	**8**	26/06/2019

Admin	9		Failure of pension payroll system resulting in pensioners not being paid in a timely manner.	1	2	4	7	2	**14**	TOLERATE 1) In the event of a pension payroll failure, we would consider submitting the previous months BACS file to pay pensioners a second time if a file could not be recovered by the pension administrators and our software suppliers.	1	**7**	26/06/2019
Admin	10		Bank reconcilations no longer carried out by BT. Income processing from the bank has been brought in house. HCC have agreed a new process of allocating income on to the ledger, however a steep learning curve still exists leading to misallocations and delay in the clearance of the suspense account.	2	2	2	6	2	**12**	TREAT 1) Pensions team to continue to work closely with staff at HCC to smooth over any teething problems relating to the newly agreed process	1	**6**	26/06/2019
Admin	11		Administrators do not have sufficient staff or skills to manage the service leading to poor performance and complaints.	1	2	3	6	2	**12**	TOLERATE 1) Surrey CC administers pensions for Surrey, East Sussex, LB Hillingdon and the Tri-Borough. Service has been excellent since this change was made.	1	**6**	26/06/2019
Admin	12		Failure to pay pension benefits accurately leading to under or over payments.	2	2	2	6	2	**12**	TREAT 1) There are occasional circumstances where under/over payments are identified. Where underpayments occur, arrears are paid as soon as possible, usually in the next monthly pension payment. Where an overpayment occurs, the member is contacted and the pension corrected in the next month. Repayment is requested and sometimes we collect this over a number of months.	1	**6**	26/06/2019
Admin	13		Unstructured training leads to under developed workforce resulting in inefficiency.	2	2	2	6	2	**12**	TREAT 1) Implementation and monitoring of a Staff Training and Competency Plan as part of the Service Specification between the Fund and Surrey County Council.	1	**6**	26/06/2019
Admin	14		Failure to identify GMP liability leads to ongoing costs for the pension fund.	3	2	1	6	2	**12**	TREAT 1) GMP to be identified as a Project as part of the Service Specification between the Fund and Surrey County Council.	1	**6**	26/06/2019
Admin	15		Failure of pension administration system resulting in loss of records and incorrect pension benefits being paid or delays to payment.	1	1	1	3	3	**9**	TREAT 1) Pension administration records are stored on the Surrey CC servers who have a disaster recovery system in place and records should be restored within 24 hours of any issue, All files are backed up daily.	2	**6**	26/06/2019
Admin	16		BT contract wind down could lead to problems for retirements in 18/19 where data is on two different systems. All returns must be completed prior to BT contract ceasing. The move to Hampshire CC due in December 2018 and ensuring that key working practices continue such as the pension interface will be a Key to reduce risks to members.	1	2	2	5	2	**10**	TREAT 1) The Bi-borough HR team are working with HCC and BT to ensure service transfer is smooth as possible. 2) 2018/19 LGPS files to be checked by the Bi-borough in June 2019.	1	**5**	26/06/2019
Admin	17		Lack of guidance and process notes leads to inefficiency and errors.	2	2	1	5	2	**10**	TREAT 1) The team will continue to ensure process notes are updated and circulated amongst colleagues in the Pension Fund and Administration teams.	1	**5**	26/06/2019
Admin	18		Lack of productivity leads to impaired performance.	2	2	1	5	2	**10**	TREAT 1) Regular appraisals with focused objectives for pension fund and admin staff.	1	**5**	26/06/2019
Admin	19		Rise in ill health retirements impact employer organisations.	2	2	1	5	2	**10**	TREAT 1) Engage with actuary re assumptions in contribution rates.	1	**5**	26/06/2019
Admin	20		Rise in discretionary ill-health retirements claims adversely affecting self-insurance costs.	2	2	1	5	2	**10**	TREAT 1) Pension Fund monitors ill health retirement awards which contradict IRMP recommendations.	1	**5**	26/06/2019
Admin	21		Poor reconciliation process leads to incorrect contributions.	2	1	1	4	2	**8**	TREAT 1) Ensure reconciliation process notes are understood by Pension Fund team. 2) Ensure that the Pension Fund team is adequately resourced to manage the reconciliation process.	1	**4**	26/06/2019

Appendix 5: Pension Fund Voting Summary: January to March 2019

The investment managers managing the Fund's assets on a segregated basis are able to report on how they have voted the Fund's specific holdings at AGMs and EGMs of companies the Fund is invested in.

LCIV Majedie voting information is as follows:

VOTING	
No. of companies	17
No. of meetings	20
No. of resolutions	202

LCIV Ruffer voting information is as follows:

VOTING	
No. of companies	11
No. of meetings	11
No. of resolutions	122

LGIM, who manage the global passive equity portfolio on behalf of the Fund, undertake extensive engagement with the companies they are invested in as well as voting. Voting data has not yet been received from the fund manager ahead of this quarterly meeting. The committee will be provided with an update in due course.

Appendix 6

Forward Plan for Pensions Sub-Committee – March 2019

Area of work	Jul 2019	Sep 2019	November 2019	February 2020
Governance	Quarterly Update Pack Pension Sub-Committee minutes Consultation updates Draft Annual Report Cash Management	Quarterly Update Pack Pension Sub-Committee minutes	Quarterly Update Pack Pension Sub-Committee minutes	Quarterly Update Pack Pension Sub-Committee minutes Governance Compliance Statement review Consultation updates
Investments	Fund Manager monitoring Aviva Presentation	Fund Manager monitoring Inflation Protection Strategy Review	Fund Manager monitoring LCIV update	Fund Manager monitoring Investment strategy statement
Funding			Actuarial Valuation Review	Actuarial Valuation Final Funding Strategy Statement

London Borough of Hammersmith & Fulham **PENSIONS SUB-COMMITTEE** **9 July 2019**	
LGPS COST CAP, MCCLOUD APPEAL (SUPREME COURT) AND ACTUARIAL VALUATION CONSULTATION (PROPOSED QUADRENNIAL PERIODS)	
Report of the Strategic Director of Finance & Governance	
Open Report	
Classification: For Information **Key Decision: No**	
Wards Affected: None	
Accountable Director: Phil Triggs, Director of Treasury and Pensions	
Report Authors: Phil Triggs, Director of Treasury and Pensions	**Contact Details:** Tel: 0207 641 4136 E-mail: ptriggs@westminster.gov.uk

1. EXECUTIVE SUMMARY

1.1 This paper provides the Pension Fund Sub-Committee with a summary of:

a. Background information on the LGPS cost cap in public service pensions and recent developments.

b. Proposed changes to the actuarial valuation process where the process could move from triennial to quadrennial valuations.

2. RECOMMENDATIONS

2.1. The Pension Fund Sub-Committee is recommended to note:

a. The report and potential implications for the Hammersmith & Fulham Pension Fund

b. The consultation on the actuarial valuation process at Appendix 1.

3. THE LGPS COST CAP

3.1. In 2010, following the Lord Hutton report of public service pensions, one of the key recommendations was that the retention of public service defined benefit schemes should have a "cost cap" mechanism to control the cost of future pension provision

3.2. One of the main factors in the calculation was how long pensions are expected to be paid (pensioner longevity). If future pensions in payment turn out to be longer than initially anticipated, then the additional costs should be reflected in a reduction in pension payment or, alternatively, an increase in member contributions in order to reflect that the members' pensions will be paid for a longer period.

3.3. Whilst the original concept from the Hutton report was a cost "cap", it was also argued that there should be a "floor". This would apply where the duration of pension paid to retired members is shorter than expected. In this event, theoretically, it would mean an increase in pensions benefit or a reduced employee contribution rate.

3.4. As new cost cap/floor mechanisms were constructed to accommodate the above points, there was an unexpected slowdown in UK longevity improvements. The result of this was that the cost floor became a far more significant issue than was initially anticipated at the time of the Hutton report. Any slowdown in longevity would mean that pensions would not be in payment for as long.

3.5. Whilst the cost cap/floor mechanism would normally be underway at this time, the Government Actuaries Department has suspended the process, pending the outcome of the McCloud Supreme Court case (see below).

4. MCLOUD CASE

4.1. In connection with the cost cap/floor process, revised actuarial assumptions were implemented to reflect the slowdown in longevity and had nearly reached completion when the Appeal Court judgment of the McCloud pensions case was reached. This is a case where the Appeal Court examined benefit protections offered to judges in the reform of the Judiciary Pension Scheme, which were intended to protect them from changes being made to the scheme in the move from final salary to career average revalued earning (CARE) related benefits.

4.2. The reforms to the judges' scheme and protection offered to older judges were found to be age discriminatory, on the basis that younger members of the judges' scheme were offered no such protection. In December 2018, the Appeal Court found against the Government. The Government has since appealed the decision to the Supreme Court.

4.3. The implications of this case are that the transitional changes to public service schemes, when moving from final salary to CARE are now deemed, or likely to be deemed, unlawful on age discrimination grounds. The cost cap/floor management process was paused, pending a Supreme Court decision, with the understanding that any implications to LGPS pensions following the final ruling will be backdated to 1 April 2019.

4.4. The Supreme Court rejected the Government's right to appeal the decision on 27 June 2019 although, given the potential ways that the Government may choose to implement, the impacts are still not clear for LGPS funds.

4.5. Officers are working to achieve a resolution before the 2019 actuarial valuation is complete. The LGPS Scheme Advisory Board will issue final guidance to funds reference the court case outcome.

5. TRIENNIAL ACTUARIAL VALUATION

5.1. With regard to the current triennial actuarial valuation, the Government has issued a consultation paper which suggests moving to quadrennial valuations from triennial (every four years instead of the current three) in line with the other public service pension schemes. Post 2019, the next actuarial valuation is widely expected to be 2024, both for LGPS Funds in England and Wales, and Scotland.

5.2. Whilst this would mean that LGPS scheme would fall into the same four-year cycle as the other public sector schemes and be aligned, a gap of five years between valuations would not be without complications in setting employer contributions over such a long period. It is likely that there would be an interim valuation in 2022 to solve the problem of the five-year gap.

6 FINANCIAL IMPLICATIONS

6.1 Information only.

7 BACKGROUND PAPERS USED IN PREPARING THIS REPORT

7.1 None.

LIST OF APPENDICES:

Appendix 1: Local Valuation Cycle Consultation

Ministry of Housing,
Communities &
Local Government

Local Government Pension Scheme: Changes to the Local Valuation Cycle and the Management of Employer Risk

Policy consultation

May 2019
Ministry of Housing, Communities and Local Government

This document/publication is also available on our website at www.gov.uk/mhclg

If you have any enquiries regarding this document/publication, complete the form at http://forms.communities.gov.uk/ or write to us at:

Ministry of Housing, Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF
Telephone: 030 3444 0000

For all our latest news and updates follow us on Twitter: https://twitter.com/mhclg

May 2019

ISBN: 978-1-4098-5459-3

Contents

Scope of the consultation

Topic of this consultation:	This consultation seeks views on policy proposals to amend the rules of the Local Government Pension Scheme 2013 in England and Wales. It covers the following areas: 1. Amendments to the local fund valuations from the current three year (triennial) to a four-year (quadrennial) cycle 2. A number of measures aimed at mitigating the risks of moving from triennial to quadrennial cycles 3. Proposals for flexibility on exit payments 4. Proposals for further policy changes to exit credits 5. Proposals for policy changes to employers required to offer LGPS membership
Scope of this consultation:	MHCLG is consulting on changes to the regulations governing the Local Government Pension Scheme (LGPS).
Geographical scope:	These proposals relate to the Local Government Pension Scheme in England and Wales only.
Impact Assessment:	The Ministry's policies, guidance and procedures aim to ensure that any decisions, new policies or policy changes do not cause disproportionate negative impacts on particular groups with protected characteristics, and that in formulating them, the Ministry has taken due regard to its obligations under the Equality Act 2010 and the Public Sector Equality Duty. We have made an initial assessment under the duty and do not believe there are equality impacts on protected groups from the proposals in sections 1 to 4 which set out changes to valuations, flexibilities on exit payments and in relation to exit credits payable under the scheme, as there will be no change to member contributions or benefits as a result. Our proposals in section 5 to remove the requirement for further education corporations, sixth form college corporations and higher education corporations in England to offer new employees access to the LGPS may result in a difference in treatment between the staff of an institution who are already in the LGPS when the change comes into force (who would have a protected right to membership of the LGPS) and new employees (who would not). It will be up to each institution to consider the potential equalities impacts when making a decision on which, if any, new employees should be given access to the scheme. Question 19 asks for views from respondents on equalities impacts and on any particular groups with protected characteristics who would be disadvantaged by the proposals contained in this consultation.

	When we bring forward legislation, a fuller analysis will include the equality impacts of any final policy proposals.

Basic Information

To:	Any changes to the LGPS rules are likely to be of interest to a wide range of stakeholders, such as local pension funds, administering authorities, those who advise them, LGPS employers and local taxpayers.
Body/bodies responsible for the consultation:	Local Government Finance Reform and Pensions, Ministry of Housing, Communities and Local Government
Duration:	This consultation will last for 12 weeks from 8 May 2019 to 31 July 2019
Enquiries:	For any enquiries about the consultation please contact: LGPensions@communities.gov.uk
How to respond:	Please respond by email to: LGPensions@communities.gov.uk Alternatively, please send postal responses to: LGF Reform and Pensions Team Ministry of Housing, Communities and Local Government 2nd Floor, Fry Building 2 Marsham Street London SW1P 4DF When you reply, it would be very useful if you could make it clear which questions you are responding to. Additionally, please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include: - your name, - your position (if applicable), - the name of organisation (if applicable), - an address (including post-code), - an email address, and - a contact telephone number.

Introduction

This consultation contains proposals on a number of matters relating to the Local Government Pension Scheme (LGPS) in England and Wales.

Amongst these, it is proposed to amend the local fund valuation cycle of the LGPS from the current three year (triennial) cycle to a four year (quadrennial) one. The Government has moved the LGPS scheme valuation to a quadrennial cycle[1], and our consultation is intended to ensure that scheme and local valuations are aligned. Views are sought on whether this is the right approach and the best way of transitioning the LGPS to a quadrennial local valuation cycle.

The LGPS is a locally administered funded pension scheme, established primarily to provide retirement benefits to individuals working in local government in England and Wales. Local fund valuations are used to set employer contribution rates and to assess whether funds are on target to meet their pension liabilities as they fall due in the years ahead. In making our proposals, we aim to ensure that a lengthening of the valuation cycle would not materially increase the risks that pension funds and their employers face. We are therefore proposing mitigation measures that would allow LGPS funds to act between valuations and address any issues as they arise, specifically:

- We propose the introduction of a power for LGPS funds to undertake interim valuations. This would allow LGPS administering authorities to act when circumstances change between valuations and undertake full or partial valuations of their funds.

- We also propose the widening of a power that allows LGPS administering authorities to amend an employer's contribution rate in between valuations, so that contribution rates can be adjusted following the outcome of a covenant check or where liabilities are estimated to have significantly reduced.

Views are sought on the detail of these measures and what LGPS funds should put in their funding strategy statements regarding these matters.

These measures are intended to help funds manage their liabilities and ensure that employer contributions are set at an appropriate level. However, for some employers, a significant issue is the cost of exiting the scheme which can be prohibitive. Current regulations require that when the last active member of an employer leaves the scheme, the employer must pay a lump sum exit payment calculated on a full buy-out basis. We are seeking views on two alternative approaches that would reduce the cliff-edge faced by employers:

- To introduce a 'deferred employer' status that would allow funds to defer the triggering of an exit payment for certain employers who have a sufficiently strong

[1] https://www.gov.uk/government/publications/public-service-pensions-actuarial-valuations

covenant. Whilst this arrangement remains in place, deferred employers would continue to pay contributions to the fund on an ongoing basis:

- To allow an exit payment calculated on a full buy-out basis to be recovered flexibly – i.e. over a period of time. This may be of use where an administering authority does not feel that granting deemed employer status would be appropriate but that some level of flexibility is in the interests of the fund and other employers.

We also seek views on an issue that has come to light in recent months. In 2018, the LGPS Regulations 2013 were amended[2] to allow the payment of 'exit credits' to scheme employers who are in surplus at the time their last active member leaves the scheme. This followed a consultation on the introduction of exit credits undertaken by the Department in 2016[3]. However, it has since been highlighted that the amendments can cause issues where an LGPS employer has outsourced a service and used contractual arrangements to share risk with their contractor. Views are sought on a mechanism via which we can address this issue.

And finally, given the LGPS's funded nature, with liabilities potentially falling back on local authorities and other public bodies in a particular area in the event an employer cannot meet its obligations, the Government is conscious of the need to ensure that scheme participation requirements remain appropriate. Changes in the higher education and further education sectors have taken place in recent years and we are consulting on proposals that would remove the requirement for further education corporations, sixth form college corporations and higher education corporations in England to offer membership of the LGPS to their non-teaching staff. Instead, reflecting their status as non-public sector, autonomous organisations, we propose it will be for each institution to determine whether to offer the LGPS to new employees or not.

Under our proposals, current active LGPS members and those eligible for active membership in an employment with a further education corporation, sixth form college corporation or higher education corporation in England would have a protected right to membership of the scheme.

Your comments are invited on the questions contained in sections 1 to 5. **The closing date for responses is 31 July 2019**.

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[2] S.I. 2018/493

[3] https://www.gov.uk/government/consultations/local-government-pension-scheme-regulations

Changes to the Local Government Pension Scheme (LGPS) valuation cycle

1.1 Changes to the local fund valuation cycle

The Government has brought the LGPS scheme valuation onto the same quadrennial cycle as the other public service schemes[4].

Aligning the LGPS scheme valuation with other public sector schemes allows for outcomes of each valuation to be looked at in parallel and for Government to make consistent decisions for the public sector as a whole.

Each LGPS fund also carries out a local valuation which is used to assess its financial health and to determine local employer contributions. Currently the valuation cycle of the scheme and of individual funds align. This will no longer be the case as the scheme nationally has moved to a quadrennial cycle. We therefore propose that LGPS funds should also move from triennial to quadrennial valuation cycles.

Moving the LGPS local fund valuations to quadrennial cycles would deliver greater stability in employer contribution rates and reduce costs. The Scheme Actuary's review of local valuations under s13 of the Public Service Pensions Act 2013 would also move to a quadrennial cycle.

However, we recognise that there are potential risks that changes in employer contribution rates may be greater as a result of longer valuation periods and that longer valuation periods could also lead to reduced monitoring of any risks and costs. Section 2 of this consultation sets out proposals to mitigate these matters.

If we move to quadrennial local fund valuations, we propose to produce draft regulations making the necessary amendments to the LGPS Regulations 2013, amending regulation 62(2), 62(3) and other consequential regulations in due course.

Question 1 – As the Government has brought the LGPS scheme valuation onto the same quadrennial cycle as the other public service schemes, do you agree that LGPS fund valuations should also move from a triennial to a quadrennial valuation cycle?

Question 2 - Are there any other risks or matters you think need to be considered, in addition to those identified above, before moving funds to a quadrennial cycle?

Question 3 - Do you agree the local fund valuation should be carried out at the same date as the scheme valuation?

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[4] https://www.gov.uk/government/publications/public-service-pensions-actuarial-valuations

1.3 Transition to a new LGPS valuation cycle

Given that LGPS funds and the other public sector schemes have carried out a valuation as at 1 April 2016, now is the best opportunity to achieve consistency. If missed, it would be 2028 before valuations of all the schemes align again. On the assumption that scheme and fund valuations are carried out at the same date, potential approaches are as follows:

a) For the next fund valuation to complete as anticipated, using data as at 31 March 2019, giving rates and adjustment certificates for the **coming five years** (i.e. from 1 April 2020-2025) but with the administering authority having the option to perform an interim valuation if circumstances require changes to contribution rates. Further fund valuations would be done using data as at 31 March 2024 and every four years thereafter.

b) For the next fund valuation to complete as anticipated, using data as at 31 March 2019, giving rates and adjustment certificates for the **coming three years** (i.e. from 1 April 2020-2023). The following valuation would be done with fund data as at 31 March 2022 but giving new rates and adjustments certificates for **only two years**. Further fund valuations would be done using data as at 31 March 2024 and every four years thereafter.

Our proposal is to adopt approach b) as it provides continuity and potentially gives LGPS funds greater funding certainty than a five-year cycle would provide.

Question 4 - Do you agree with our preferred approach to transition to a new LGPS valuation cycle?

Dealing with changes in circumstances between valuations

2.1. Ability to conduct an interim valuation of local funds

With a longer valuation period of four years, there is greater scope for changes in assets and liabilities between valuations with a consequent potential increase in risks. In relation to the value of assets, this might include a significant downturn in value or increased volatility in returns. In relation to liabilities, this could be due to a sustained lower level of interest rates. The Government Actuary considered the potential impact of volatility of asset returns and changes in economic conditions on funds in their report on the 2016 local valuations[5]. The results showed that funds could face significant pressure on employer contributions in some future scenarios.

As part of a package of mitigation measures, we are proposing to introduce a new power to enable funds to conduct an interim valuation to reassess their position and, where appropriate, adjust the level of contributions outside of the regular cycle. This would not affect the timing of the next quadrennial fund valuation or the scheme valuation. It would, however, allow administering authorities to manage risk and avoid the need for very sharp corrections if maintaining the longer review cycle. This is consistent with the aim of the current regulations in preserving as much stability as possible in contribution rates across valuations (see Reg 66(2)(b) of the 2013 LGPS Regulations).

Depending on the trigger for the interim valuation, different levels of actuarial advice might be needed. For example, it may not be necessary to revisit all of the demographic assumptions and scheme experience where the trigger is a major financial down-turn shortly after the last valuation was completed. Funds will want to assure themselves that they have access to such data and analysis as is proportionate to the nature of the trigger and the time elapsed since the previous valuation.

Allowing an interim valuation gives greater adaptability should longer-term trends emerge that it would be prudent to address ahead of the next scheduled valuation.

To limit the risk that interim valuations could be timed to take advantage of short-term market conditions and undermine the cost and administrative advantages of a longer valuation cycle, we propose that interim valuations may take place only for the reasons set out in an authority's Funding Strategy Statement. In exceptional circumstances not envisaged in the Funding Strategy Statement, a fund could apply for a direction from the Secretary of State to carry out an interim valuation. The Secretary of State would also have a power to require interim valuations of funds either on representation from funds, scheme employers or of his own motion.

We propose to include in the regulations, supported by statutory guidance, certain protections so that decisions on whether to undertake an interim valuation should only be

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[5] https://www.gov.uk/government/publications/local-government-pension-scheme-review-of-the-actuarial-valuations-of-funds-as-at-31-march-2016

made by the administering authority having due regard to the views of their actuary and following consultation with the Local Pension Board. Where an administering authority undertakes an interim valuation it would also be obliged to notify the Secretary of State of the reasons for it and the conclusions reached. The costs of the valuation would be recovered in the usual way from all employers. As interim valuations should not be necessary frequently, the cost is likely to be more than offset by the move to four-yearly valuations.

Question 5 - Do you agree that funds should have the power to carry out an interim valuation in addition to the normal valuation cycle?

Question 6 - Do you agree with the safeguards proposed?

2.2. Review of employer contributions

A four-year valuation cycle would also mean fewer opportunities to respond to changes in the financial health of scheme employers. This means that the assessment made at the time of the valuation about that employer being able to meet all of its obligations to the fund, most importantly to make contributions (often referred to as an employer's "covenant strength"), might be out of date.

CIPFA's guidance on maintaining a Funding Strategy Statement[6] requires funds to identify the employer risks that inevitably arise from managing a large and often changing group of scheme employers. In their related guidance on *Managing Risk in the Local Government Pension Scheme* (2018) they emphasise the importance of maintaining a knowledge base to track and identify risk levels for each employer. It further suggests that employers be categorised into groups depending on the level of risk they present to the fund as a whole.

We understand that some funds already carry out frequent reviews of their employers' covenant strength. Currently, the LGPS regulations provide funds with a limited number of tools to manage or reduce any risks identified. These tools include:

- At each valuation specifying secondary rate contributions that target a funding level that has been set with regard to the covenant strength of that employer (as allowed by Regulation 62(7) of the 2013 LGPS Regulations);
- Requiring adequate security for new admission bodies (as required in Part 3 of Schedule 2 to the 2013 LGPS Regulations);
- Increasing the security where existing admitted bodies wish to make changes to their admission agreement (as allowed for in Part 3 of Schedule 2 to the 2013 LGPS Regulations);
- Reviewing employer contributions where there is evidence that the employer is likely to exit the scheme (Regulation 64(4) of the 2013 LGPS Regulations);

[6] Preparing and Maintaining a Funding Strategy Statement, published September 2016

- Reviewing employer contributions where there is evidence that the liabilities of that employer have increased substantially (see Regulations 64(6)(b) of the 2013 LGPS Regulations).

Whilst a four-yearly review of employer contributions would be sufficient for statutory or tax-payer backed employers, we recognise that for some scheme employers, and in particular admitted bodies, it may be prudent to allow funds to amend contribution rates more frequently. That would be driven by a change in the deficit recovery period and/or funding target level for a single employer, or group of employers, where this was felt necessary to protect other employers in the scheme or the solvency of the fund itself.

This would include giving funds the ability to offer employers a reduction in their contribution rate if they were able to make a one-off deficit reduction payment or there was a significant change in the composition of their workforce following a merger. We propose to introduce the ability for an employer to request a reassessment of its contribution rate where it believes that its liabilities have reduced.

We propose that funds would need to specify in their Funding Strategy Statement those employers (generally statutory or tax-raising employers) for whom the regular assessment of employer contributions through valuations is sufficient and what events would trigger reassessment through covenant reviews for other employers.

As these reassessments of employer contributions are designed to protect the interest of all employers and the scheme as a whole, the costs of conducting them anticipated in the Funding Strategy Statement, or triggered by a particular event or concern over covenant, would normally be met by the fund as a whole. However, where a scheme employer requested a reassessment because it believed that this would lead to a reduction in its contribution rate, then this would be paid for by the employer concerned.

Question 7 – Do you agree with the proposed changes to allow a more flexible review of employer contributions between valuations?

2.3. Guidance on setting a policy

As set out above we are proposing that the regulations would require funds to include their policy on interim valuations and reviews of employer contributions in their Funding Strategy Statement. We would also anticipate that CIPFA would want to reflect these new tools to manage risk in the guidance which it offers to funds on drafting an Funding Strategy Statement and in managing risk. However, to help ensure consistency of approach between funds, we also propose that in setting their policy they would also be required to have regard to advice that we would invite the Scheme Advisory Board to provide. This would include advice in the following areas:

- The exceptional circumstances where the case for an interim valuation could be made to the Secretary of State;
- The process for triggering and timescale for completing interim valuations;

- Best practice in working with scheme employers and other interested parties where an interim valuation is undertaken;
- What level of professional advice is appropriate to deliver the interim valuation.

In relation to action being taken to review employer contributions we would similarly ask the Scheme Advisory Board to consider guidance on the following areas:

- How to work with employers when a request is made for a review of its employer contributions;
- The process for carrying out employer covenant reviews and how to work with employers where the fund feels that further action is needed;
- Communicating with all scheme employers on how risk is being managed and how the cost of reviews will be met;
- What comprises a proportionate level of actuarial and other professional advice.

Question 8 – Do you agree that Scheme Advisory Board guidance would be helpful and appropriate to provide some consistency of treatment for scheme employers between funds in using these new tools?

Question 9 – Are there other or additional areas on which guidance would be needed? Who do you think is best placed to offer that guidance?

Flexibility on exit payments

3.1 Introduction

We know that some smaller and less financially robust employers are finding the current exit payment regime in LGPS onerous. Rather than protecting the interests of members, it may mean employers continue to accrue liabilities that they cannot afford. It can also create the risk that some employers could be driven out of business as a result of inability to meet a substantial exit payment when they finally come to leave. This can have implications for other jobs, the delivery of local services and future support for the scheme.

These problems arise because employer debt is calculated at full buy-out basis[7] on the employer's total accrued liabilities to the scheme, and the amount due up-front or in a short period of time if the last active member leaves an employer can be significantly higher than their on-going contributions. If an employer does not have a source of capital available with which to pay the employer debt, they can effectively find themselves tied to the scheme indefinitely, even if this is not the most prudent way to proceed for all those concerned.

The current regime is designed to protect those scheme employers who remain in the scheme when one or more other employers have ceased to employ active members and who may be left with orphan liabilities. Any changes to the employer debt regime would have to be carefully considered to ensure that they would not result in an increased risk to members or remaining scheme employers.

In recognition of these and other issues, the Scheme Advisory Board has commissioned AON to look at the potential funding, legal and administrative issues presented by the participation of what it calls Tier 3 employers[8] in the scheme, and to identify options to improve the situation. A working group has been established by the Scheme Advisory Board with a view to making recommendations to the Secretary of State later in the year. It is hoped that the Scheme Advisory Board working group will be able to include this consultation in its deliberations.

We have also heard from many in the sector that the time is right to bring LGPS more in line with wider practice in the private pensions sector. Deferred debt arrangements in the private sector enable an employer in a multi-employer pension scheme, who fulfils certain conditions, to defer their obligation to pay an employer debt on ceasing to employ an active scheme member. The arrangement requires the employer to retain all their previous responsibilities to the scheme and continue to be treated as if they were the employer in

[7] Exit payments are currently based on that employer's share of the deficit in the scheme calculated on a 'full-buy out basis' (i.e. the amount that would need to be paid to an insurer to take on the pension scheme's liabilities).

[8] Scheme Advisory Board defines Tier 3 bodies as being those which are not tax-payer backed ("Tier 1"), academies ("Tier 2") or admitted bodies performing services under contract to local authorities ("Tier4")

relation to that scheme. A key consideration in considering whether to introduce a similar arrangement into LGPS will be how to ensure that employers wanting to take advantage of this option have sufficient and appropriate assets to cover their liabilities and that the arrangement will not adversely affect other employers.

We therefore propose to grant funds more flexibility to manage an employer's liabilities in this situation, by spreading exit payments over a period or by allowing an employer with no active members to defer exit payments in return for an ongoing commitment to meet their existing liabilities.

3.2 Flexibility in recovering exit payments

This proposal aims to enable scheme employers which are ceasing to employ any active members with the flexibility, in agreement with the administering authority, to spread exit payments over a period, where this would also be in the interests of the fund and other employers.

This option would be available in situations where an administering authority considered that some flexibility over the repayment programme would be in the best interests of the fund and other employers. We understand that some funds have been attempting to achieve a similar objective through side-agreements with employers at the time of exit. However, we feel that it would be more appropriate to regularise this approach and put it on a firm legislative footing.

In order to implement this new flexibility we have considered the model implemented by the Scottish Public Pensions Agency. This allows administering authorities to adjust an exiting employer's contributions to ensure that the exit payment due is made by the expected exit date or spread over such a period as the fund considers reasonable. This is set out in their Regulation 61(6)[9]:

> *"(6) Where in the opinion of an administering authority there are circumstances which make it likely that a Scheme employer (including an admission body) will become an exiting employer, the administering authority may obtain from an actuary a certificate specifying the percentage or amount by which, in the actuary's opinion—*
>
> *(a) the contribution at the primary rate should be adjusted; or*
>
> *(b) any prior secondary rate adjustment should be increased or reduced,*
>
> *with a view to providing that assets equivalent to the exit payment that will be due from the Scheme employer are provided to the fund by the likely exit date or, where the Scheme employer is unable to meet that liability by that date, over such period of time thereafter as the administering authority considers reasonable."*

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[9] In the Local Government Pension Scheme (Scotland) Regulations 2018

This is a permissive model that gives administering authorities considerable flexibility to use their judgement and local knowledge in balancing the competing interests involved.

We propose to follow this approach but would welcome views from consultees on whether some additional protections are required, such as a maximum time limit over which exit payments could be spread (perhaps three years).

For the avoidance of doubt, we propose that the exit payment in these circumstances would continue to be calculated as now on a full buy-out basis.

Question 10 – Do you agree that funds should have the flexibility to spread repayments made on a full buy-out basis and do you consider that further protections are required ?

3.3 Deferred employer status and deferred employer debt arrangements

These proposals aim to enable scheme employers who are ceasing to employ any active members to defer exit payments in return for an ongoing commitment to meet their existing liabilities, in agreement with the fund. This commitment would protect the fund and other employers. This will be of particular help to smaller employers (such as charities) in managing their obligation to make an exit payment when they cease to employ an active member of the scheme.

Drawing on the model of the S75 approach that was recently introduced by DWP for private sector[10] defined benefit multi-employer funds, we have set out a possible model for the LGPS. We would welcome views from consultees on how to develop the model to best reflect the needs of all parties participating in LGPS.

i) Definition of deferred employer status

Employers taking advantage of this ability to maintain a link with the scheme, despite no longer having active members, would become "deferred employers". A deferred employer is defined as an employer who, at the point that their last active member leaves the scheme, enters into a deferred employer debt arrangement with the administering authority, and that arrangement has not been terminated by a 'relevant event' (see section iii below).

ii) Basis on which a deferred employer debt arrangement would be offered

To enter into a deferred employer debt arrangement, the fund would need to be satisfied that the employer has just, or is about to, become an exiting employer as defined in LGPS regulations and has a sufficient covenant not to place the fund under undue risk. When DWP consulted on the equivalent provisions for private sector schemes (referred to earlier) they considered the introduction of a test whereby employers could only be eligible

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[10] These are the employer debt arrangements made under S75 of the Pensions Act 1995. More information is available here: https://www.gov.uk/government/consultations/the-draft-occupational-pension-schemes-employer-debt-amendment-regulations-2017

for the equivalent of a deferred employer debt arrangement if they were already funded above a prescribed level. In line with the decision DWP took in relation to private sector DB schemes, we have considered and rejected the option of setting such a minimum level of funding. We believe that this will be a relevant factor in scheme managers' assessment of covenant and risk and therefore needs to be weighed alongside all the other evidence available.

iii) Termination of a deferred employer debt arrangement

In order to protect the fund, we would expect any deferred employer debt arrangement to set out in the following circumstances which would trigger termination, to be known as "relevant events":

- the employer has new active members;
- the employer and scheme manager both agree to terminate the agreement and an exit payment falls due;
- the scheme manager assesses that the covenant has significantly deteriorated and a relevant event occurs (insolvency, voluntary winding up, CVA);
- the employer restructures and the covenant value is significantly affected in the view of the scheme manager. Restructuring for these purposes occurs where the employer's corporate assets, liabilities or employees pass to another employer;
- the fund serves notice that the employer has failed to comply with any of its duties under LGPS regulations or other statutory provisions governing the operation of a pension fund.

iv) Responsibilities of the deferred employer

An employer in a deferred employer debt arrangement would still be an employer for scheme funding and scheme administration purposes. Funds will continue to carry out regular actuarial valuations to establish whether or not their funding position is on track according to the funding strategy they have adopted, and to put in place a recovery plan where any shortfalls are identified. Deferred employers will be required to make secondary contributions as part of this plan and this requirement will apply to any employer who has entered into a deferred debt arrangement.

We will expect administering authorities to adopt a robust policy to be set out in their Funding Strategy Statement, following consultation with employers and their Local Pension Board and having regard to any guidance issued by CIPFA or the Secretary of State. Our intention is to give funds some flexibility to use their judgement and local knowledge to reach suitable arrangements that balances the competing interests involved.

We would expect administering authorities to offer deferred employer debt arrangements when this is in the interests of the other fund employers and where there is not expected to be a significant weakening of the employer covenant within the coming 12 months.

Question 11 – Do you agree with the introduction of deferred employer status into LGPS?

Question 12 – Do you agree with the approach to deferred employer debt arrangements set out above? Are there ways in which it could be improved for the LGPS?

3.4 Proposed approach to implementation of deferred employer debt arrangements

We do not intend to legislate for every aspect of the model above. Our starting point is that the key obligations and entitlements of parties should be in the regulations. Statutory guidance can be helpful in putting more flesh on the bones and ensuring that there is consistency in application. On the assessment of risk and in balancing competing interests of scheme stakeholders we consider that the Scheme Advisory Board is better placed to offer real-world, credible guidance to funds. We would welcome views from consultees about the appropriate balance to be struck between legal requirements to be set out in regulations, statutory guidance issued under regulation 2(3A) of the 2013 Regulations, and guidance from the Scheme Advisory Board.

Question 13 – Do you agree with the above approach to what matters are most appropriate for regulation, which for statutory guidance and which for fund discretion?

3.5 Summary of options for management of employer exits

Implementing the proposals above on exit payments would make the following set of options available to administering authorities when dealing with employer exits:

1. Calculate and recover an exit payment as currently for employers ready and able to leave and make a clean break;
2. Agree a repayment schedule for an exit payment with employers who wish to leave the scheme but need to be able to spread the payment;
3. Agree a deferred employer debt arrangement with an employer to enable them to continue paying deficit contributions without any active members where the scheme manager was confident that it would fully meet its obligations.

We expect that employers will want to see a level of transparency and consistency in the use which administering authorities make of this new power. We expect that that statutory or Scheme Advisory Board guidance will be necessary in addition to a change to regulations and welcome views on which type of guidance would be appropriate for which aspects of the proposals.

Question 14 – Do you agree options 2 and 3 should be available as an alternative to current rules on exit payments?

Question 15 – Do you consider that statutory or Scheme Advisory Board guidance will be needed and which type of guidance would be appropriate for which aspects of these proposals?

Exit credits under the LGPS Regulations 2013

4.1 Introduction of exit credits in May 2018

In April 2018, the Government made changes[11] to the LGPS Regulations 2013 allowing exit credits to be paid from the Scheme for the first time. Following the amendments, which were effective from 14 May 2018, where the last active member of a scheme employer leaves the LGPS, an exit credit may be payable if an actuarial assessment shows that the employer is in surplus on a full buy-out basis at the time of their exit. Prior to the changes, the 2013 Regulations had only provided that a scheme employer would be responsible for any shortfall and where such a shortfall occurred they would be responsible for paying an exit payment.

The amendments to allow exit credits to be paid from the Scheme were intended to address this imbalance. They also followed prior concerns that the lack of such a provision meant some scheme employers who were nearing their exit were reluctant to pre-fund their deficit out of concern that, if they contributed too much, they would not receive their excess contributions back. Accordingly, the government consulted on addressing this via the introduction of exit credits in May 2016[12], as part of a wider consultation exercise.

Feedback from the consultation exercise was broadly supportive of this change. Responses focussed on two technical issues:

- Some respondents suggested that our proposed timescales for payment of an exit credit were too tight (at one month).
- Some also suggested that we should include a clarifying provision noting that where an exit credit had been paid there could be no further claim on the fund.

Both concerns were addressed in the final regulations, which provided that funds would have three months to pay an exit credit and that no further payment could be made to a scheme employer from an administering authority after an exit credit had been paid.

4.2 Exit credits and pass-through

In the period since the 2013 Regulations were amended, some concerns have been raised about a consequential impact of the introduction of exit credits, specifically where a scheme employer has outsourced a service or function to a service provider. In such

[11] S.I. 2018/493
[12] https://www.gov.uk/government/consultations/local-government-pension-scheme-regulations

situations, scheme employers often use a ‘pass-through’ approach to limit the service provider’s exposure to pensions risk to obtain a better contract price. Where pass-through is used, service contracts, or side agreements to service contracts between LGPS employers and their service providers will often be used to set out the terms that apply.

It has been drawn to our attention that where LGPS employers entered into a contract with a service provider before the introduction of exit credits, the terms of the pass-through agreement may cause unforeseen issues to arise. This may occur where an employer has entered into a side agreement with a service provider which includes pass-through provisions, and under this side agreement, the authority has agreed to pay the service provider’s LGPS employer contributions for the life of the contract as well as meet any exit payment at the end of the contract. When the contract ceases, the service provider (as the scheme employer) may be significantly in surplus and entitled to an exit credit, even though the employer has borne the costs and the risk in relation to the service provider’s liabilities through the life of the contract.

This situation would clearly not have been what was intended when the contract was agreed. It would be unfair for a service provider to receive an exit credit in such a situation and it is our intention to make changes that would mean that service providers cannot receive the benefit of exit credits in such cases.

4.3 Proposal to amend LGPS Regulations 2013

We therefore propose to amend the 2013 Regulations to provide that an administering authority must take into account a scheme employer’s exposure to risk in calculating the value of an exit credit. There would be an obligation on the administering authority to satisfy itself if risk sharing between the contracting employer and the service provider has taken place (for example, via a side agreement which the administering authority would not usually have access to). If the administering authority is satisfied that the service provider has not borne any risk, the exit credit may be calculated as nil.

We also intend that such a change would be retrospective to the date that the LGPS Regulations 2013 were first amended to provide for the introduction of exit credits – i.e. to 14 May 2018. This would ensure that where a service provider has not borne pensions risk but has become entitled to an exit credit, they should not receive the benefit of that exit credit.

By making this change retrospective, the revised exit credit provisions would apply in relation to all scheme employers who exit the scheme on or after 14 May 2018.

In the event of any dispute or disagreement on the level of risk a service provider has borne, the appeals and adjudication provisions contained in the LGPS Regulations 2013 would apply.

It should also be noted that the government is consulting on the introduction of a new way for service providers to participate in the LGPS[13]. Use of the deemed employer approach,

[13] https://www.gov.uk/government/consultations/local-government-pension-scheme-fair-deal-strengthening-pension-protection

if introduced, would also prevent exit credits becoming payable to service providers where they have not borne contribution or funding risks.

Question 16 – Do you agree that we should amend the LGPS Regulations 2013 to provide that administering authorities must take into account a scheme employer's exposure to risk in calculating the value of an exit credit?

Question 17 – Are there other factors that should be taken into account in considering a solution?

Employers required to offer LGPS membership

5.1 Further education corporations, sixth form college corporations and higher education corporations

Under the LGPS Regulations 2013, further education corporations, sixth form college corporations and higher education corporations in England and Wales are required to offer membership of the LGPS to their non-teaching staff.

In recent years, a number of changes have taken place in the further education and higher education sectors.

- In 2012, the Office for National Statistics took further education and sixth form college corporations in England out of the General Government sector, reflecting changes introduced by the Education Act 2011 which, in the view of the ONS, took public control away from such organisations.

- The Technical and Further Education Act 2017 provided for the introduction of a new statutory insolvency regime for further education and sixth form college corporations in England and Wales meaning, for the first time, it will be possible for such bodies to become legally insolvent. The Government expects cases of insolvency to be rare.

- The Higher Education and Research Act 2017 established a new regulatory framework and a new single regulator of higher education in England, the Office for Students (the OfS). The OfS adopts a proportionate, risk-based approach to regulating registered higher education providers consistent with its regulatory framework.

Reflecting the independent, non-public sector status, of further education, sixth form colleges, and the autonomous, non-public sector status of higher education corporations, these bodies are responsible for determining their own business models and for ensuring that their financial positions are sound. As such, these bodies may value greater flexibility in determining their own pension arrangements for their own workforces. Indeed, some respondents to the Department for Education consultation 'Insolvency regime for further education and sixth form colleges', held in 2017-18, requested that the obligation to offer LGPS to all eligible staff be removed.

The LGPS is, unlike many public service pension schemes, a "funded scheme". This means that employee and employer contributions are set aside for the payment of pensions and are invested to maximise returns. It is a statutory scheme, with liabilities potentially falling back on other LGPS employers in the event of an employer becoming insolvent. The costs associated with meeting the liabilities of a failed organisation could therefore fall back on local authorities and other scheme employers, meaning there may be a direct impact on the finances of public bodies in a particular area if an organisation fails.

Given the nature of the LGPS and the changes in the further education and higher education sectors, it is right to consider whether it is still appropriate for LGPS regulations to require that these employers offer the LGPS for all eligible staff.

We propose to remove the requirement for further education corporations, sixth form college corporations and higher education corporations in England to offer new employees access to the LGPS.

Under our proposals each corporation would have the flexibility to decide whether to offer the LGPS to all or some eligible new employees. We recognise that corporations will continue to view offering LGPS as a valuable and important tool in recruitment and retention strategies, but the flexibility as to when to use the tool should be for the corporations themselves.

We also propose that those already in employment with a further education, sixth form college or a higher education corporation in England and who are eligible to be a member of the LGPS before the regulations come into force have a protected right to membership of the scheme. These employees would retain an entitlement to membership of the scheme for so long as they remain in continuous employment with the body employing them when the regulations come into force. These employees would also retain an entitlement to membership of the scheme following a compulsory transfer to a successor body, for example, following the merger of two corporations.

Further and higher education policy is devolved to the Welsh Government. Whilst some of the changes in the sectors highlighted here apply to bodies in Wales as well as in England, at the moment, the Welsh Government does not propose to change the requirements of the LGPS Regulations 2013 in relation to further education corporations and higher education corporations in Wales. These bodies will continue to be required to offer membership of the LGPS to their non-teaching staff.

Question 18 – Do you agree with our proposed approach?

Public sector equality duty

6.1 Consideration of equalities impacts

The Ministry's policies, guidance and procedures aim to ensure that any decisions, new policies or policy changes do not cause disproportionate negative impacts on particular groups with protected characteristics, and that in formulating them the Ministry has taken due regard to its obligations under the Equality Act 2010 and the Public Sector Equality Duty. We have made an initial assessment under the duty and do not believe there are equality impacts on protected groups from the proposals in sections 1 to 4 which set out changes to valuations, flexibilities on exit payments and in relation to exit credits payable under the scheme, as there will be no change to member contributions or benefits as a result.

Our proposals in section 5 to remove the requirement for further education corporations, sixth form college corporations and higher education corporations in England to offer new employees access to the LGPS may result in a difference in treatment between the staff of an institution who are already in the LGPS when the change comes into force (who would have a protected right to membership of the LGPS), and new employees (who would not). It will be up to each institution to consider the potential equalities impacts when making their decision on which, if any, new employees should be given access to the scheme.

Question 19 – Are you aware of any other equalities impacts or of any particular groups with protected characteristics who would be disadvantaged by the proposals contained in this consultation?

Summary of consultation questions

Question 1 – As the Government has brought the LGPS scheme valuation onto the same quadrennial cycle as the other public service schemes, do you agree that LGPS fund valuations should also move from a triennial to a quadrennial valuation cycle?

Question 2 - Are there any other risks or matters you think need to be considered, in addition to those identified above, before moving funds to a quadrennial cycle?

Question 3 - Do you agree the local fund valuation should be carried out at the same date as the scheme valuation?

Question 4 - Do you agree with our preferred approach to transition to a new LGPS valuation cycle?

Question 5 - Do you agree that funds should have the power to carry out an interim valuation in addition to the normal valuation cycle?

Question 6 - Do you agree with the safeguards proposed?

Question 7 – Do you agree with the proposed changes to allow a more flexible review of employer contributions between valuations?

Question 8 – Do you agree that Scheme Advisory Board guidance would be helpful and appropriate to provide some consistency of treatment for scheme employers between funds in using these new tools?

Question 9 – Are there other or additional areas on which guidance would be needed? Who do you think is best placed to offer that guidance?

Question 10 – Do you agree that funds should have the flexibility to spread repayments made on a full buy-out basis and do you consider that further protections are required?

Question 11 – Do you agree with the introduction of deferred employer status into LGPS?

Question 12 – Do you agree with the approach to deferred employer debt arrangements set out above? Are there ways in which it could be improved for the LGPS?

Question 13 – Do you agree with the above approach to what matters are most appropriate for regulation, which for statutory guidance and which for fund discretion?

Question 14 – Do you agree options 2 and 3 should be available as an alternative to current rules on exit payments?

Question 15 – Do you consider that statutory or Scheme Advisory Board guidance will be needed and which type of guidance would be appropriate for which aspects of these proposals?

Question 16 – Do you agree that we should amend the LGPS Regulations 2013 to provide that administering authorities must take into account a scheme employer's exposure to risk in calculating the value of an exit credit?

Question 17 – Are there other factors that should be taken into account in considering a solution?

Question 18 – Do you agree with our proposed approach?

Question 19 – Are you aware of any other equalities impacts or of any particular groups with protected characteristics who would be disadvantaged by the proposals contained in this consultation?

About this consultation

This consultation document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the General Data Protection Regulation, and the Environmental Information Regulations 2004.

If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Ministry of Housing, Communities and Local Government will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. A full privacy notice is included at Annex A.

Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us via the complaints procedure.

Annex A

Personal data

The following is to explain your rights and give you the information you are be entitled to under the Data Protection Act 2018.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. **The identity of the data controller and contact details of our Data Protection Officer**
The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gov.uk

2. Why we are collecting your personal data
Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data
The Data Protection Act 2018 states that, as a government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

Section 21 of the Public Service Pension Act 2013 requires the responsible authority, in this case the Secretary of State, to consult such persons as he believes are going to be affected before making any regulations for the Local Government Pension Scheme. MHCLG will process personal data only as necessary for the effective performance of that duty

3. With whom we will be sharing your personal data
We do not anticipate sharing personal data with any third party.

4. For how long we will keep your personal data, or criteria used to determine the retention period.
Your personal data will be held for two years from the closure of the consultation*.*

5. Your rights, e.g. access, rectification, erasure
The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:
a. to see what data we have about you
b. to ask us to stop using your data, but keep it on record
c. to ask to have all or some of your data deleted or corrected

d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at https://ico.org.uk/, or telephone 0303 123 1113.

6. Your personal data will not be sent overseas

7. Your personal data will not be used for any automated decision making.

8. Your personal data will be stored in a secure government IT system.

London Borough of Hammersmith & Fulham PENSIONS SUB-COMMITTEE 9 July 2019	
EXIT CAP CONSULTATION	
Report of the Strategic Director of Finance & Governance	
Open Report	
Classification: For Information **Key Decision: No**	
Wards Affected: None	
Accountable Director: Phil Triggs, Director of Treasury and Pensions	
Report Authors: Phil Triggs, Director of Treasury and Pensions	**Contact Details:** Tel: 0207 641 4136 E-mail: ptriggs@westminster.gov.uk

1. EXECUTIVE SUMMARY

1.1 This paper provides the Pension Fund Sub-Committee with a summary of the background of the proposed £95,000 cap on exit payments in the public sector.

2. RECOMMENDATIONS

2.1. The Pension Fund Sub-Committee is recommended to note this report.

3. EXIT PAYMENTS

3.1. In 2015, the Government first announced plans to introduce a cap on exit payments in the public sector. It was intended that a cap would include any pension strain cost. The cap was legislated for in the Enterprise Act 2016, which amends the Small Business, Enterprise and Employment Act 2015, but required secondary legislation to be introduced.

3.2. It is intended that the exit cap will apply to the whole of the public sector. At the first stage of implementation, the Regulations will apply to exit payments made by all local authorities, the UK Civil Service, the NHS in England and Wales, academy schools, Police Forces (including civilian staff) and Fire and Rescue Authorities. Exceptions are housing management companies, further and higher education corporations and sixth form college corporations who are not covered by the Regulations.

3.3. On 10 April 2019, HM Treasury opened a consultation on the draft Regulations, directions and guidance to implement the exit cap. The consultation will run for 12 weeks and close on 3 July 2019.

3.4. The background of the proposed cap is the prevention of senior managers retiring early with significant six-figure pension strain and other statutory redundancy pay-offs.

3.5. Payments related to death in service, ill health retirement, pay in lieu of holiday and payments made in compliance with an order made by a court or tribunal are not exit payments for the purposes of these Regulations.

3.6. If the cap is imposed, with an individual taking an early, enforced retirement as a result of the local authority's implementation of business efficiency changes (applies to officers aged over 55), whereas under the current regime that officer's pension would be made up to retirement age with no pensions reduction, under the new rules the total of the statutory redundancy payment and the pension strain would not be allowed to exceed £95,000. As a result, the officer would suffer an actuarial reduction in their pension if the pension strain exceeded the cap.

3.7. The exit cap covers redundancy payments (including statutory redundancy payments), severance payments, pension strain costs and all other payments made as a result of termination of employment. The statutory redundancy element of an exit payment cannot be reduced. If the cap is exceeded, other elements that make up the exit payment must be reduced, so that an exit payment at or below £95,000 is achieved.

3.8. The proposed Regulations do not apply to the lump sum element of a retiree's pension.

4. APPLYING THE EXIT CAP IN THE LGPS

4.1. The impact of the Regulations on a LGPS member if the exit cap was to be exceeded (with the exit payment including pension strain cost) is not 100% clear in the consultation document. It is understood that the policy intent is for the member's pension benefits to be actuarily reduced to the extent that the total exit payment cap of £95,000 is not breached, with the member having the option of paying extra to buy out some or all the reduction, or the member taking a pension cut.

4.2. Amendments to current LGPS Regulations would be required to facilitate this change, plus guidance from the Government Actuary Department on how to calculate the pension reduction.

4.3. A person who receives any exit payment must inform any other public body that employs them about that payment. Employers are required to record and publish information about capped exit payments.

4.4. The consultation invites responses from employing bodies within scope and out of scope of the Regulations, employees, bodies representing those employers or employees, academics with expertise in this area, public and private sector pay, pension, remuneration and HR professionals and anyone else who might be impacted by this consultation.

4.5. Hammersmith and Fulham will have responded formally to the consultation by the deadline on 3 July 2019.

4.6. The following questions have been asked:

1. Does draft schedule 1 to the regulations capture the bodies intended? If not, please provide reasons.
2. Do you agree with the current list of bodies in scope for the first round of implementation? If not, please provide reasons.
3. Do you agree with the exemptions outlined? If not, please provide evidence.
4. Does the guidance adequately support employers and individuals to apply the draft regulations as they stand? If not, please provide information on how the guidance could be enhanced.
5. Is the guidance sufficiently clear on how to apply the mandatory and discretionary relaxation of the regulations, especially in the case of whistle-blowers?
6. Is there further information or explanation of how the regulations should be applied which you consider should be included in the guidance? If so, please provide details.
7. Are there other impacts not covered above which you would highlight in relation to the proposals in this consultation document?
8. Are you able to provide information and data in relation to the impacts set out above?

9. FINANCIAL IMPLICATIONS

a. Information only.

10. BACKGROUND PAPERS USED IN PREPARING THIS REPORT

a. None.

LIST OF APPENDICES:

Appendix 1: Exit Cap Consultation Document

Open consultation

Restricting exit payments in the public sector: consultation on implementation of regulations

Published 10 April 2019

Contents

This publication is available at https://www.gov.uk/government/consultations/restricting-exit-payments-in-the-public-sector/restricting-exit-payments-in-the-public-sector-consultation-on-implementation-of-regulations

0.1 Executive summary

Exit payments to employees leaving the public sector workforce in 2016-2017 cost the taxpayer £1.2 billion[1], with payments at and above £100,000 amounting to £0.2 billion. Exit payments can be important to employers' ability to reform and react to new circumstances, whilst providing support for employees as they find new employment or as a bridge until retirement age. However, public sector employers have a responsibility to demonstrate that they are using public money efficiently and responsibly, and to ensure that pay and terms are always proportionate, justifiable and fair to the taxpayers who fund them.

The government does not believe that the majority of six figure exit payments, which are far in excess of those available to most workers in the public sector or wider economy, are proportionate or provide value for money for taxpayers.

The government therefore introduced powers to cap exit payments in the public sector at £95,000 in the Small Business, Enterprise and Employment Act 2015. This consultation sets out the proposed method of implementing that cap, including which bodies should be in scope.

These regulations will help public sector employers to ensure exit payments represent value for money to the taxpayer who funds them.

1. Introduction

1.1 Policy background

Exit payments associated with loss of employment, including redundancy, are important to employers' ability to reform, and an important source of support for employees as they find new employment, or as a bridge until retirement age. However, it is also important that exit payments are proportionate and fair to the taxpayer and the government is concerned about the number of exit payments made to public sector workers that exceed or come close to £100,000.

Such payments can exceed three times the average annual earnings in the public sector[2], and are far higher than the value of exit payments made to the majority of public sector workers[3]. The government does not believe that such payments often provide value for money or are fair to the taxpayers who fund them.

The government legislated for a cap of £95,000 on exit payments (the cap) in the public sector in the Small Business Enterprise and Employment Act 2015 (the 2015 act) as amended by the Enterprise Act 2016 (the 2016 act). The 2015 act sets out the duty to implement the cap through secondary legislation.

This consultation sets out the proposed draft regulations, schedule to the regulations, accompanying guidance and directions. The government welcomes comments on the draft regulations.

The draft schedule 1 sets out in detail the proposed scope of the regulations for this first stage of implementation. The government will expand the bodies in scope to the whole of the public sector in due course, with exemptions for certain bodies. Exemptions will be considered on a case by case basis, taking into account the nature of and functions undertaken by the employer.

1.2 Policy intention

Sections 153A to 153C of the 2015 act enable HM Treasury to make regulations restricting public sector exit payments to a maximum of £95,000. The draft regulations define the types of payments intended to be subject to the cap, how the proposed cap is intended to operate, and the scope of the regulations. The bodies in scope of the draft regulations are set out in schedule 1 of the draft regulations. It is the government's intention to extend the scope of the regulations to the whole public sector in due course.

1.3 Aim and scope of the consultation

The government will consider the consultation responses and decide on how best to achieve its aims in relation to the questions and proposals set out in this document. Responses are particularly welcomed from:

- employing bodies within the scope of the draft regulations as well as employing bodies within the wider public sector but not included in schedule 1 at present
- bodies representing public sector employers
- employees and their representative bodies
- members of the academic community with expertise in this area
- pay, pension, remuneration and HR professionals in both the private and public sectors
- anyone else who may be impacted by this consultation

1.4 How to respond

This consultation will run for twelve weeks and will close on 3 July. Responses can be submitted online (https://www.smartsurvey.co.uk/s/QABLW/) or sent by email to: ExitPaymentCap@hmtreasury.gov.uk with the subject heading 'Consultation on Exit Payment Cap'.

Alternatively please send responses by post to:

Workforce, Pay & Pensions Team,
HM Treasury,
1 Horse Guards Road,

London
SW1A 2HQ

When responding please say if you are a business, individual or representative body. In the case of representative bodies, please provide information on the number and nature of people you represent.

1.5 Consultation principles

This consultation is being run in accordance with the government's consultation principles (https://www.gov.uk/government/publications/consultation-principles-guidance).

1.6 Privacy notice

This notice sets out how HM Treasury will use your personal data for the purposes of the 'public sector exit payment' and explains how your rights under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

Your data (data subject categories)

The personal information relates to you as either a member of the public, parliamentarians, and representatives of organisations or companies.

The data we collect (data categories)

Information may include your name, address, email address, job title, and employer of the correspondent, as well as your opinions. It is possible that you will volunteer additional identifying information about themselves or third parties.

Legal basis of processing

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in HM Treasury. For the purpose of this consultation the task is consulting on departmental policies or proposals or obtaining opinion data in order to develop good effective government policies.

Special categories data

Any of the categories of special category data may be processed if such data is volunteered by the respondent.

Legal basis for processing special category data

Where special category data is volunteered by you (the data subject), the legal basis relied upon for processing it is: the processing is necessary for reasons of substantial public interest for the exercise of a function of the Crown, a Minister of the Crown, or a government department.

This function is consulting on departmental policies or proposals, or obtaining opinion data, to develop good effective policies.

Purpose

The personal information is processed for the purpose of obtaining the opinions of members of the public and representatives of organisations and companies, about departmental policies, proposals, or generally to obtain public opinion data on an issue of public interest.

Who we share your responses with

Information provided in response to a consultation may be published or disclosed in accordance with the access to information regimes. These are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA) and the Environmental Information Regulations 2004 (EIR).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals with, amongst other things, obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on HM Treasury. Where someone submits special category personal data or personal data about third parties, we will endeavour to delete that data before publication takes place.

Where information about respondents is not published, it may be shared with officials within other public bodies involved in this consultation process to assist us in developing the policies to which it relates. Examples of these public bodies (https://www.gov.uk/government/organisations).

As the personal information is stored on our IT infrastructure, it will be accessible to our IT contractor, NTT. NTT will only process this data for our purposes and in fulfilment with the contractual obligations they have with us.

How long we will hold your data (Retention)

Personal information in responses to consultations will generally be published and therefore retained indefinitely as a historic record under the Public Records Act 1958.

Personal information in responses that is not published will be retained for three calendar years after the consultation has concluded.

Your rights

- you have the right to request information about how your personal data are processed and to request a copy of that personal data
- you have the right to request that any inaccuracies in your personal data are rectified without delay
- you have the right to request that your personal data are erased if there is no longer a justification for them to be processed
- you have the right, in certain circumstances (for example, where accuracy is contested), to request that the processing of your personal data is restricted
- you have the right to object to the processing of your personal data where it is processed for direct marketing purposes
- you have the right to data portability, which allows your data to be copied or transferred from one IT environment to another

How to submit a Data Subject Access Request (DSAR)

To request access to personal data that HM Treasury holds about you, contact:

HM Treasury Data Protection Unit
G11 Orange
1 Horse Guards Road
London
SW1A 2HQ

dsar@hmtreasury.gov.uk

Complaints

If you have any concerns about the use of your personal data, please contact us via this mailbox: privacy@hmtreasury.gov.uk.

If we are unable to address your concerns to your satisfaction, you can make a complaint to the Information Commissioner, the UK's independent regulator for data protection. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire
SK9 5AF

0303 123 1113

casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

Contact details

The data controller for any personal data collected as part of this consultation is HM Treasury, the contact details for which are:

HM Treasury
1 Horse Guards Road
London
SW1A 2HQ

020 7270 5000

public.enquiries@hmtreasury.gov.uk

The contact details for HM Treasury's Data Protection Officer (DPO) are:

The Data Protection Officer
Corporate Governance and Risk Assurance Team
Area 2/15
1 Horse Guards Road
London
SW1A 2HQ

privacy@hmtreasury.gov.uk

2. Proposed scope of draft regulations

Employers in the whole of the public sector have a responsibility to demonstrate that they are using public money efficiently and responsibly, and to ensure that pay and terms are always proportionate, justifiable and fair to taxpayers.

In order to determine the scope of the cap, HM Treasury will be guided by the Office for National Statistics (for National Account purposes) classification of bodies within the central and local government, and non-financial public corporation sectors. There will be a limited number of exemptions.

The government is proposing a staged process of implementation across the public sector. The first stage will capture most public sector employees, before extending the cap to the rest of the public sector in the second stage. Prioritising in this way will ensure most exit payments in the public sector are limited to £95,000 without further delay, while work continues on expanding the scope of the regulations.

2.1 Bodies in scope of the current draft regulations

The draft regulations apply to payments made by public sector authorities to employees and by public sector offices to office holders. However, they do not apply to the following payments:

A. Payments made by a relevant Scottish authority, as defined in s 153B(5) of the 2015 act (see section 4.1 below)

B. A relevant Welsh exit payment, as defined in s 153B(6) of the 2015 act

C. Payments made by Northern Irish authorities which wholly or mainly exercise devolved functions

The following categories of public sector employer are within scope of these regulations where they fall within the responsibility of the UK government, regarding their employment:

- the UK Civil Service, its executive agencies, non-ministerial departments and non-departmental public bodies (including Crown non-departmental public bodies and Her Majesty's Prison and Probation Service)
- the NHS in England and Wales[4]
- academy schools
- local government including fire authorities' employees and maintained schools
- police forces, including civilian and uniformed officers

Some bodies have more than one classification.For example, if an executive agency is also classified as a type of body not currently in scope of the cap, such as a trading fund, it should not be captured during this round of implementation.

The full list of proposed public sector bodies in scope of the draft regulations are listed in draft schedule 1. The categories of final employers which will be included in schedule 1 is subject to responses to the consultation.

All public sector employers should make value for money decisions on exit payments, and spend public money responsibly. It is the government's strong expectation that bodies not in the proposed scope of these regulations will come forward with their own, commensurate cap on exit payments.

2.2 Bodies and payments exempt in the draft regulations

The government proposes that the Secret Intelligence Service, the Security Service, the Government Communications Headquarters and the Armed Forces should be exempt from the cap. Therefore, these employers are not listed in draft schedule 1 to the regulations.

Careers in these organisations have unique features, and the special requirements made of individuals – including the transition to civilian life – are reflected in the range and level of compensation payments for these workforces. Compensation and resettlement payments make up a core part of the overall remuneration and reward package for those working in these fields, and payments are sometimes required in order to ensure that individuals are properly compensated for what can be lifelong impacts, felt at relatively early ages. The government believes it is right that – in general – these employers have flexible and responsive remuneration practices which may fall outside of the scope of the draft regulations.

As a general rule accrued pension rights, including rights to pension commutation lump sums, are not within scope of the draft regulations because they do not normally involve any cost to the employer. However, in some cases pension payments do involve an additional employer cost relating to an exit and often represent a significant amount of an individual's exit payment. For this reason they are within scope of the draft regulations unless an exemption applies. These payments arise when an employer has to make a 'pension strain' payment, for example to provide the pension scheme member with an immediate unreduced pension before the member's Normal Pension Age or when an employer has to make a pension commutation related payment.

Fire and Rescue Authorities (FRAs) have discretion to remove the current commutation lump sum restriction (of 2.25 x pension) that applies to firefighter members of the 1992 Firefighters' Pension Scheme who are under age 55 and have less than 30 years' service. Where a FRA exercises this discretion, this results in an employer related cost because it is required to make a payment equivalent to the additional amount to the member's pension fund account. It is proposed that these payments should be exempt from the scope of the regulations as they do not fund an increase in the actuarial value of the firefighter's pension.

Therefore, regulation 7(c)(i) exempts payments made by a FRA to their pension fund account, where the FRA exercises its discretion to allow a firefighter (who is subject to the above 2.25 times pension commutation lump sum restriction) to commute up to a maximum of 25% of their annual pension for a pension lump sum. Effectively, this discretion aligns with the commutation entitlement available to firefighters who are aged 55 or over, or who have accrued the maximum 30 years' service.

The government is also considering an exemption for payments made by FRAs to their pension fund account in respect of firefighters who are unable to maintain operational fitness through no fault of their own and where the FRA has agreed to put into payment an authority initiated early retirement pension. This will honour the government's previous commitment (https://publications.parliament.uk/pa/cm201415/cmhansrd/cm141215/wmstext/141215m0001.htm) that firefighter members of the 2006 and 2015 Firefighters' Pension Schemes in these circumstances should be awarded an unreduced pension if they cannot be redeployed.

Question 1

Does draft schedule 1 to the regulations capture the bodies intended (described in section 2.1 above)? If not, please provide details.

Question 2

Do you agree with the current list of bodies in scope, for the first round of implementation? If not, please provide reasons.

Question 3

Do you agree with the exemptions outlined? If not, please provide evidence.

3. Guidance and directions

The government welcomes comment on the attached guidance and directions.

The guidance aims to explain, in plain English, how the draft regulations should be applied. In particular, the guidance details the circumstances in which the cap may and must be relaxed, and which actors have the power to relax the cap.

Section 5 of the guidance and the separate mandatory HMT directions are intended to ensure that the cap must be relaxed in specific mandatory cases, for example where a settlement agreement is entered into following a whistleblowing or discrimination complaint, and where it may be relaxed in specific discretionary cases, for example where imposing the cap would cause undue hardship.

This reflects the government's position – and the position reflected in the draft regulations – that the public sector exit payment cap is not designed to discourage workers from making disclosures covered by whistleblowing law or to prevent such people from receiving an appropriate remedy from an employment tribunal.

Question 4

Does the guidance adequately support employers and individuals to apply the draft regulations as they stand? If not, please provide information on how the guidance could be enhanced.

Question 5

Is the guidance sufficiently clear on how to apply the mandatory and discretionary relaxation of the regulations, especially in the case of whistleblowers?

Question 6

Is there further information or explanation of how the regulations should be applied which you consider should be included in the guidance? If so, please provide details.

4. Devolution summary and equalities impacts

4.1 Devolution

The cap policy extends to all the bodies where employment terms are subject to approval by the UK government (subject to exemptions set out in the remaining paragraphs of section 4.1).

Payments made by authorities which wholly or mainly exercise functions that could be devolved to Northern Ireland are not covered by the draft regulations.

Payments made by a relevant Scottish authority, namely the Scottish Parliamentary Corporate authority or any authority which wholly or mainly exercises functions devolved to Scotland are also not covered by these regulations, with the exception of payments made by the Scottish Administration to holders of non-ministerial offices in the administration or to staff of the administration, which are covered by these regulations.

Relevant Welsh exit payments, namely payments made to the holders of the offices specified in s 153B(6) of the Enterprise Act 2016 are not covered by these regulations.

The regulations contain a power in regulation 12 to relax the exit payment cap following compliance with HMT directions or with consent of HMT, however this power does not apply to exit payments made by a devolved Welsh authority.

4.2 Equalities

An equalities impact assessment of the cap (https://www.gov.uk/government/consultations/consultation-on-a-public-sector-exit-payment-cap/consultation-on-a-public-sector-exit-payment-cap#impact-analysis) was conducted in the previous consultation, ahead of legislation on the policy.

If, following consultation, the government decides to implement a two stage implementation process, it will do so on the basis of a further assessment of the equalities impact.

Question 7

Are there other impacts not covered above which you would highlight in relation to the proposals in this consultation document?

Question 8

Are you able to provide information and data in relation to the impacts set out above?

5. Summary of questions

Question 1

Does draft schedule 1 to the regulations capture the bodies intended (described in section 2.1 above)? If not, please provide details.

Question 2

Do you agree with the current list of bodies in scope, for the first round of implementation? If not, please provide reasons.

Question 3

Do you agree with the exemptions outlined? If not, please provide evidence.

Question 4

Does the guidance adequately support employers and individuals to apply the draft regulations as they stand? If not, please provide information on how the guidance could be enhanced.

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Are there other impacts not covered above which you would highlight in relation to the proposals in this consultation document?

Question 8

Are you able to provide information and data in relation to the impacts set out above?

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1. Whole of Government Accounts 2016-17 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/720178/WGA_2016-17_web.pdf), page 70. ↩
2. Mean public sector earnings according to the ONS: £29,574 ↩
3. Whole of Government Accounts 2016-17 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/720178/WGA_2016-17_web.pdf), page 70, Table 4.E. ↩
4. The 2015 Act confers power to cap exit payments in the NHS in Wales, because the compensation schemes are not devolved to Welsh ministers. ↩

<table>
<tr><td colspan="2">London Borough of Hammersmith & Fulham

PENSIONS SUB-COMMITTEE

9 July 2019</td><td></td></tr>
<tr><td colspan="3">LOW CARBON STRATEGY</td></tr>
<tr><td colspan="3">Report of the Strategic Finance Director</td></tr>
<tr><td colspan="3">Open Report</td></tr>
<tr><td colspan="3">Classification - For Decision

Key Decision: No</td></tr>
<tr><td colspan="3">Wards Affected: None</td></tr>
<tr><td colspan="3">Accountable Director: Philip Triggs, Director of Treasury and Pensions</td></tr>
<tr><td>Report Author: Matt Hopson, Strategic Investment Manager</td><td colspan="2">Contact Details:
Tel: 0207 641 4126
E-mail: mhopson@westminster.gov.uk</td></tr>
</table>

1. EXECUTIVE SUMMARY

1.1 This report presents the draft Pension Fund Annual Report and Statement of Accounts for the year ended 31 March 2019.

2. RECOMMENDATIONS

2.1 The Committee is recommended to approve:

a. The Pension Fund Annual Report for 2018/19.

2.2 The committee is recommended to note:

a. The Pension Fund Accounts for 2018/19.

3 ANNUAL REPORT

3.1 The production of the Pension Fund Annual Report 2018/19, which includes the Pension Fund Accounts 2018/19, is a regulatory requirement and needs to be approved by the Pension Fund Sub-Committee by 30 September following the year end. The draft Pension Fund Annual Report for 2018/19 is attached as Appendix 1.

3.2 Sub-Committee members are asked to comment on any matters in the draft Pension Fund Annual Report and delegate approval of the final document to the Director of Treasury & Pensions in consultation with the Chair.

3.3 The Pension Fund accounts 2018/19 were produced and handed to the auditors on 31 May 2019 along with the Council's Statement of Accounts 2018/19, meeting the statutory deadline of 31 May 2019. A draft Annual Report has yet to be shared with the external auditors but will be following approval at this Sub-Committee meeting. The external audit is currently underway, beginning on 1 July 2019.

3.4 The Pension Fund investments returned 5.0% over the year, although this was 2.5% below the benchmark for the year. The Fund suffered poor performance from its UK Equities allocation and poor returns from its diversified growth fund. The Fund remains ahead of its benchmark over a ten-year time horizon and since inception.

4 CONSULTATION

4.1 Not applicable.

5 EQUALITY IMPLICATIONS

5.1 Not applicable.

6 LEGAL IMPLICATIONS

6.1 None.

7 FINANCE AND RESOURCES IMPLICATIONS

7.1 None.

8 IMPLICATIONS FOR BUSINESS

8.1 Not applicable.

9 RISK MANAGEMENT

9.1 None.

10 PROCUREMENT IMPLICATIONS

10.1 None.

11 IT STRATEGY IMPLICATIONS

11.1 None.

LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
1.	None		

LIST OF APPENDICES:

Appendix 1: Draft Pension Fund Annual Report and Statement of Accounts 2018/19

Annual Report

Hammersmith & Fulham Pension Fund • 2019/20

h&f
hammersmith & fulham

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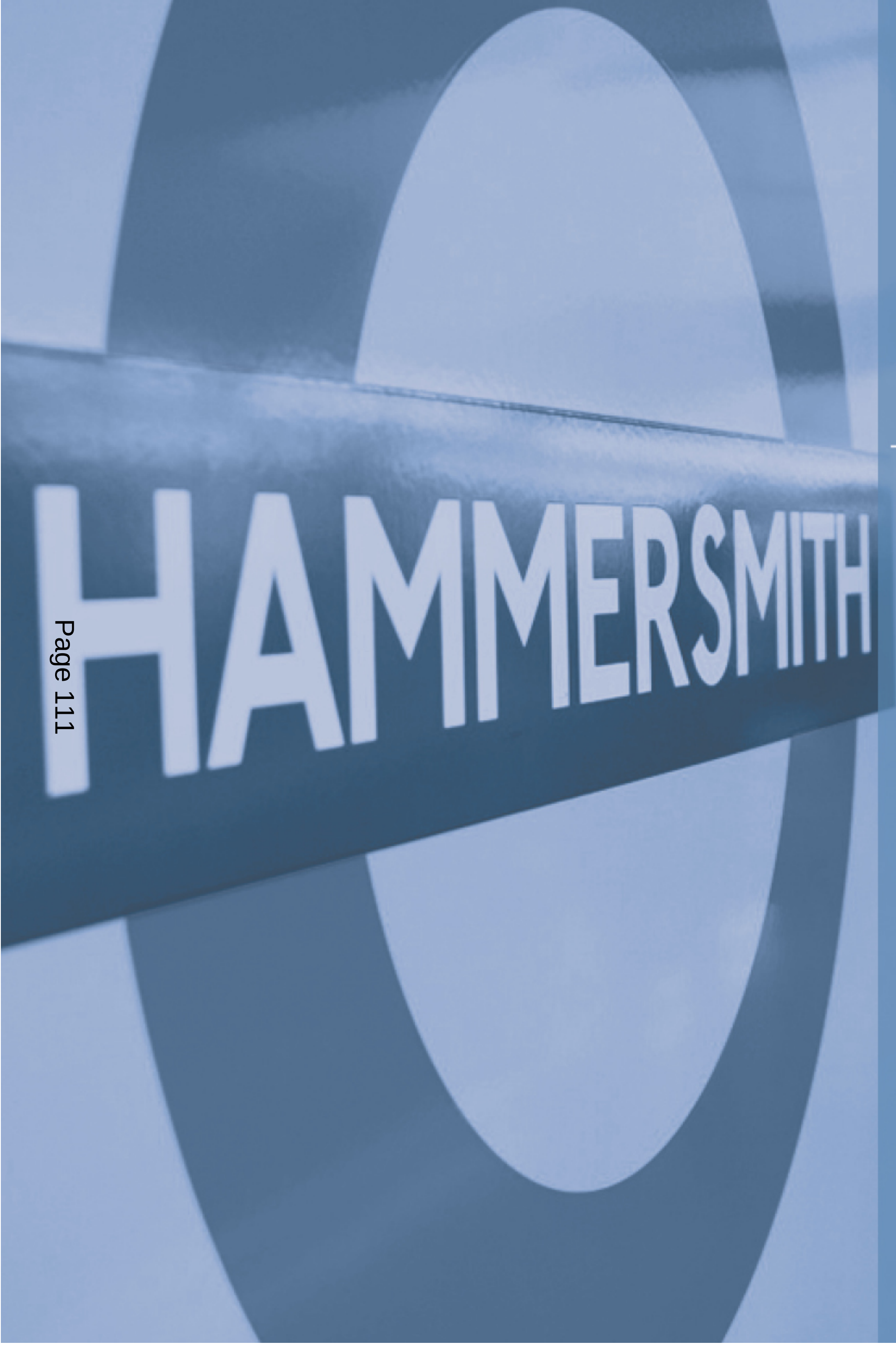

1. Preface

Report from Chair of the Pensions Sub-Committee

WELCOME TO THE ANNUAL REPORT OF HAMMERMSITH AND FULHAM PENSION FUND

The Pensions Sub-Committee is responsible for overseeing the management of the London Borough of Hammersmith and Fulham Pension Fund, including investment management and pension administration issues. As the current Chairman of this Committee, I am pleased to introduce the Pension Fund's Annual Report for the year 2018-19.

During the year, the value of the Fund increased by over £42m to £1,052m. This is in part due to the significant depreciation of sterling in relation to the Pension Fund's overseas assets, but also strong performance of the Fund's diversifying assets in inflation protection, infrastructure and multi asset credit. The Sub-Committee continues to monitor the Fund closely at each quarterly committee meeting and challenges the investment advisors as necessary to ensure the Fund's investments are being managed effectively.

The Fund will complete the 2019 actuarial valuation next year, with the expectation of an improvement to the 2016 position thanks to strong investment returns over the period. The actuary reported in 2016 that the Fund has sufficient assets to cover 88% of future pension liabilities and an overall deficit of £114m.

The Fund has transferred assets to the London Collective Investment Vehicle (LCIV) in the quest for efficiencies and fee reductions. In 2018/19 it was agreed that a further £85m would be transferred to the LCIV Buy and Maintain Bond Fund from the Insight Bonds Plus Fund. The Pension Fund now has almost 70% of its assets pooled and pooling of assets will continue over the coming years to maximise cost savings and net of fees returns for the Fund.

The Pension Fund remains conscious of its role in ensuring good environmental, social and governance behaviours from the companies in which it invests, with a key part of this looking at the Fund's carbon footprint. After reviewing this, the Fund elected to switch its global passive equity index to the MSCI Low Carbon Index in the Autumn of 2018. As at 31 March 2019, the value of this investment was £374m which accounts for around 36% of the Fund.

The headline numbers show that the MSCI World Low Carbon Target Index contains, in absolute terms, 43 million tonnes of CO2 (equivalent) less than the MSCI World Index at 28 million compared with 71 million. This combined with the investment in the Aviva Renewable Infrastructure Fund (£31m) shows the Fund is taking an active approach to being a responsible investor.

I would like to thank all those involved in the management of the Pension Fund during the year especially those who served on the Sub-Committee during 2018-19

Councillor Iain Cassidy
Chairman of the Audit, Pensions & Standards Committee & Pensions Sub-Committee

Introduction

The London Borough of Hammersmith and Fulham Pension Fund is part of the national Local Government Pension Scheme (LGPS) and is administered locally by Hammersmith and Fulham Council. It is a contributory defined benefit pension scheme established in accordance with statute, which provides for the payment of benefits to employees and former employees of the Hammersmith and Fulham Council and the admitted and scheduled bodies in the Fund. These benefits include retirement pensions and early payment of benefits on medical grounds and payment of death benefits where death occurs either in service or in retirement. Teachers are excluded from this scheme as they are administered under the Teachers' Pension Scheme.

The Fund is financed by contributions from employees, the Council, the admitted and scheduled bodies and from investment returns on the Fund's investment assets. Contributions rates for employees set in accordance with the Local Government Pension Scheme Regulations 2013. Employer contributions are set based on the triennial actuarial funding valuation. The next valuation is due in 2019/20 based on the Fund's data as at 31 March 2019.

The benefits payable from the Fund in respect of service from 1 April 2014 are set out in the Local Government Pension Scheme Regulations 2013, as amended, and in summary consist of:

- Career average revalued earnings (CARE), revalued in line with the Consumer Prices Index.
- Pensionable pay to include non-contractual overtime and additional hours.
- Flexibility for member to pay 50% contributions for 50% of the pension benefit
- Normal pension age to equal the individual member's State Pension Age.
- Option to trade £1 of pension for a £12 tax-free lump sum at retirement.
- Death in service lump sum of three times pensionable pay and survivor benefits
- Early payment of pensions in the event of ill health.

The benefits payable in respect of service prior to 1 April 2014 are based on an employee's final salary and the number of years eligible service. Benefits accrued in the Scheme before 1st April 2014 are protected up to that dated based on the scheme member's final year's pay.

The Fund is governed by the Public Service Pensions Act 2013 and the following secondary legislation:

- The LGPS Regulations 2013 (as amended)
- The LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended) and
- The LGPS (Management and Investment of Funds) Regulations 2016.

The content and format of this annual report is prescribed by the LGPS Regulations 2013.

Publication of this report gives the Council the opportunity to demonstrate the high standard of governance and financial management applied to the Fund. It brings together several separate reporting strands into one comprehensive document that enables both the public and employees to see how the Fund is managed and how well it is performing.

It is in the interest of both employees and the public that the Fund is well managed and continues to provide high returns and excellent value for money.

Introduction (continued)

This annual report comprises the following sections:

- **Management and Financial Performance** which explains the governance and management arrangements for the Fund, as well as summarising the financial position and the approach to risk management.
- **Investment Policy and Performance** which details the Fund's investment strategy, arrangements and performance.
- **Scheme Administration** which sets out how the Scheme's benefits and membership are administered.
- **Actuarial Information** which includes the funding position of the Fund with a statement from the Fund's actuary.
- **The Fund's Annual Accounts** for the year ended 31 March 2019.
- **List of contacts** and a glossary of some of the more technical terms
- **Appendices** setting out the various regulatory policy statements of the Fund:
    - Governance Compliance Statement
    - Statement of Investment Principles
    - Communication Policy
    - Funding Strategy Statement

Further information about the Local Government Pension Scheme can be found at: *www.lbhfpensionfund.org*

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Management and Financial Information

Governance Arrangements

PENSION FUND COMMITTEE

The London Borough of Hammersmith & Fulham Council has delegated responsibility for pension matters to the Audit, Pensions and Standards Committee.

The Committee is comprised of six elected representatives of the council – four from the administration and two opposition party representatives. Members of the admitted bodies and representatives of the Trade Unions may attend the committee meetings but have no voting rights. In order to manage the workload of the committee, it has delegated decisions in relation to all pension matters to the Pensions Sub-Committee.

The Sub-Committee obtains and considers advice from the Tri-Borough Director of Pensions and Treasury, the Section 151 Officer and, as necessary, from the Fund's appointed actuary, advisors and investment managers.

Terms of reference for the Sub-Committee are:

- To agree the investment strategy and strategic asset allocation having regard to the advice of the fund managers and the investment consultant.
- To monitor performance of the Pension Fund, individual fund managers, custodians, actuary and other external advisors to ensure that they remain suitable.
- To determine the Fund's management arrangements, including the appointment and termination of fund managers, actuary, custodians and fund advisors.
- To agree the Statement of Investment Principles, the Funding Strategy Statement, the Business Plan for the Fund, the Governance Policy Statement, the Communications Policy Statement and the Governance Compliance Statement and to ensure compliance with these.
- To approve the final Statement of Accounts of the Pension Fund and to approve the Annual Report.
- To receive actuarial valuations of the Pension Fund regarding the level of employers' contributions necessary to balance the Pension Fund.
- To oversee and approve any changes to the administrative arrangements, material contracts and policies and procedures of the Council for the payment of pensions, and allowances to beneficiaries.
- To make and review an admission policy relating to admission agreements generally with any admission body.
- To ensure compliance with all relevant statutes, regulations and best practice with both the public and private sectors.
- To review the arrangements and managers for the provision of Additional Voluntary Contributions for fund members.
- To receive and consider the Auditor's report on the governance of the Pension Fund.
- To determine any other investment or Pension Fund policies that may be required from time to time to comply with Government regulations and to make any decisions in accordance with those policies

The current membership of the Pensions Sub-Committee is set out below. All elected members served for the full year in 2018/19.

Councillor	Committee Attendance 2018/19
Iain Cassidy (Chair)	5/5
Matt Thorley (Vice Chair)	5/5
Rebecca Harvey	4/5
Asif Siddique	5/5
Mike Adam (Co-opted)	4/5

Councillors may be contacted at Hammersmith Town Hall, King Street, London, W6 9JU

LOCAL PENSION BOARD

The Council has also established a Pensions Board (the Board) to assist the Pensions Sub-Committee as required by the Public Services Pensions 2013. The purpose of the Pensions Board is to provide oversight of the Pensions Sub-Committee.

The Board does not have a decision-making power in relation to management of the Fund but is able to make recommendations to the Pensions Sub-Committee. It meets at least twice a year.

Terms of reference for the Local Pension Board are:

- To secure compliance with the LGPS Governance regulations and any other legislation relating to the governance and administration of the Fund.
- To secure compliance with any requirements imposed by the Pensions Regulator in relation to the Scheme
- To ensure effective and efficient governance and administration of the Scheme

The membership of the Board is as follows:

- Two employer representatives comprising one from an admitted or scheduled body and two nominated by the Council;
- Three scheme member representatives from the Council or an admitted or scheduled body.

The current membership of the Pensions Board is set out below. All members served for the full year 2018/19.

Board Member	Employer/Employee	Attendance 2018/19
Cllr Rory Vaughn (Chair)	Employer	2/2
Cllr Bora Kwon	Employer	1/2
Eric Kersey	Employee	1/2
Orin Miller	Employee	1/2
Neil Newton	Employee	0/2

MEMBER AND OFFICER TRAINING

During 2018/19 knowledge was gained at various meetings with investment managers in addition to individual attendance at conferences and seminars.

Training Programme	Date
Legislation and Governance	24 October 2018
Equity Protection	20 November 2018
Environmental and Social Governance	20 November 2018
Fixed Income	26 March 2019

Further relevant training is planned for 2019/20 based on self-assessments completed by Sub-Committee and board members in accordance with the policy.

CONFLICTS OF INTEREST

The Pension Fund is governed by elected members acting as trustees and the Code of Conduct for elected members' sets out how any conflicts of interests should be addressed. The Members Code of Conduct is in Part 5 of the Council Constitution which can be found online at *www.lbhf.gov.uk*

The Code includes general provisions on ethics and standards of behaviour which require elected members to treat others with respect and not to bully, intimidate or do anything to compromise the impartiality of those who work for or on behalf of the Council.

The Code also contains rules about "disclosable pecuniary interests" and sets out the action an elected member must take when they have such an interest in Council business, for instance withdrawing from the room or chamber when the matter is discussed and decided in committee, unless dispensation has been obtained from the Council's Monitoring Officer.

GOVERNANCE COMPLIANCE STATEMENT

The LGPS Regulations 2013 require Pension Funds to prepare, publish and maintain a governance compliance statement; and to measure the governance arrangements in place against a set of best practice principles. This measurement should result in a statement of full, partial or non-compliance with a further explanation provided for any non- or partial-compliance.

The key issues covered by the best practice principles are:

- Formal committee structure;
- Committee membership and representation;

- Selection and role of lay members;
- Voting rights;
- Training, facility time and expenses.

The Fund's Governance Compliance statement was updated in June 2015 can be found at Appendix 1.

Scheme Management and Advisors

EXTERNAL PARTIES

Investment Advisor	Deloitte	
Investment Managers	**Global Equities (Passive)**	**UK Equities (Active)**
	Legal & General Investment Management	London LGPS CIV - Majedie Asset Management
	Private Multi-Asset Credit	**Absolute Return**
	Partners Group	London LGPS CIV – Ruffer
	Infrastructure	**Fixed Income**
	Aviva Investors	Oakhill Advisors
	Partners Group	London LGPS CIV – PIMCO
	Private Equity	**Long Lease Property**
	Invesco	Aberdeen Standard
	Unigestion	**Inflation Linkage**
		M&G Investments
Custodian	Northern Trust	
Banker	NatWest Bank	
Actuary	Barnett Waddingham	
Auditor	Grant Thornton LLP	
Legal adviser	Eversheds Sutherland	
Scheme Administrators	Surrey County Council	
AVC Providers	Zurich Assurance	Equitable Life Assurance Society

OFFICERS

Strategic Director of Finance and Governance (S151 Officer)	Hitesh Jolapara	
Tri-Borough Pensions Team	Phil Triggs	Yvonne Thompson-Hoyte
	Matt Hopson	Tim Mpofu from August 2018
	Miriam Adams to September 2018	Billie Emery from November 2018
	Mat Dawson from March 2018	Alastair Paton
Director of Corporate Services	Mark Grimley	
Pensions Manager	Maria Bailey	

Risk Management

The Fund's primary long-term risk is that its assets fall short of its liabilities such that there are insufficient assets to pay promised benefits to members. The investment objectives have been set with the aim of maximising investment returns over the long term within specified risk tolerances. This aims to optimise the likelihood that the promises made regarding members' pensions and other benefits will be fulfilled.

The responsibility for the Fund's risk management strategy rests with the Pensions Sub-Committee. In order to manage the risks two Pension Fund Risk Registers are maintained, one focusing on investment risks and the other focusing on administration risk. These documents are reviewed quarterly. For the key risks which have been identified, appropriate planned actions have been introduced to minimise their impact. The risk registers are managed by the Tri-Borough Director of Pensions and Treasury and risks have been assigned to the appropriate "risk owners".

The key risks identified within the Pension Fund risk register are:

Objective Area at Risk	Risk	Risk Rating	Responsible Officer	Mitigating Actions
Investment	Significant volatility and negative sentiment in global investment markets cause by global political uncertainty	High	Strategic Director of Finance and Governance	The Fund's officers are in regular dialogue with investment managers with regards to their management of political risk. The Fund holds a well-diversified portfolio and the investment strategy is reviewed regularly.
Governance	Changes LGPS Regulations	Medium	Tri-Borough Director of Pensions and Treasury	The Fund will consider the future impact on employer contributions and cash flows will considered during the 2019 actuarial valuation process. The Fund regularly monitors the impact of LGPS (Management of Funds) Regulations 2016

Objective Area at Risk	Risk	Risk Rating	Responsible Officer	Mitigating Actions
Operational	Failure to hold personal data securely in breach of General Data Protection Regulation (GDPR) legislation	Medium	Strategic Director of Finance and Governance	Data encryption technology is in place within the organisation allowing for the secure transmission of data to external service providers
Funding	Insufficient cash available to the Fund to meet pension payments leading to investment assets being sold at sub-optimal prices to meet pension obligations	Low	Tri-Borough Director of Pensions and Treasury	The Fund's officers maintain a cashflow forecast which is monitored weekly and reported to the Pensions Sub-Committee quarterly.

Risks arising from financial instruments are outlined in the notes to the Pension Fund Accounts (Note 16).

The Funding Strategy Statement (Appendix 3) sets out the key risks, including demographic, regulatory, governance, to not achieving full funding in line with the strategy. The actuary reports on these risks at each triennial valuation or more frequently as and when required.

Objective Area at Risk	Risk	Risk Rating	Responsible Officer	Mitigating Actions
Administration	Loss of funds through fraud or misappropriation leading to financial loss	Medium	Strategic Director of Finance and Governance	The Fund has independent reconciliation processes in place to monitor financial transactions. Third parties are regulated by the FCA and a review of their internal control reports is carried out annually. The Fund's finance and HR functions are internally audited periodically
Governance	Committee members do not have appropriate skills or knowledge to discharge their responsibility appropriately	Medium	Tri-Borough Director of Pensions and Treasury	The Fund has a Knowledge and Skills Policy in place and monitors the training requirements for members. The Fund acquires advices from the Fund's consultant on matters relating to the investment strategy
Operational	Concentration of knowledge in a small number of offices and risk of departure of key staff	Low	Tri-Borough Director of Pensions and Treasury	The Fund's finance team has a library of process notes for all officers to access.

Objective Area at Risk	Risk	Risk Rating	Responsible Officer	Mitigating Actions
				The officers attend regular industry training events as part of their continuous professional development. The Fund has a succession plan in place in the event of departure of key staff. The Tri-Borough arrangement increases the resilience of the fund
Governance	Non-compliance with regulation changes relating to the pension scheme or data protection leads to fines, penalties and damage to reputation	Low	Tri-Borough Director of Pensions and Treasury	The Fund's internal controls are regularly reviewed. The governance arrangements of the Fund allow for the Fund to report any breaches as soon as they occur to mitigate any negative impact.

THIRD PARTY RISKS

The Council has outsourced the following functions of the Fund:

- Investment management;
- Custodianship of assets;
- Pensions administration.

As these functions are outsourced, the Council is exposed to third party risk. A range of investment managers are used to diversify manager risk.

To mitigate the risks regarding investment management and custodianship of assets, the Council obtains independent internal controls assurance reports from the reporting accountants to the relevant service providers. These independent reports are prepared in accordance with international standards. Any weaknesses in internal control highlighted by the controls assurance reports are reviewed and reported as necessary to the Pension Committee.

The Council's internal audit service undertakes planned programmes of audits of all the Councils' financial systems on a phased basis, all payments and income/contributions are covered by this process as and when the audits take place.

The results of these reviews are summarised below and cover 99.5% of investment holdings at 31 March 2019.

Fund Manager	Type of Assurance	Control Framework	Compliance with Controls	Reporting Accountant
Aberdeen Standard	ISAE 3402	Reasonable assurance	Reasonable assurance	KPMG LLP
Aviva Investors	ISAE 3402	Reasonable assurance	Reasonable assurance	PWC LLP
Invesco	ISAE 3402	Reasonable assurance	Reasonable assurance	PWC LLP
Legal & General	ISAE 3402	Reasonable assurance	Reasonable assurance	KPMG LLP
M&G Investments	SOC10	Reasonable assurance	Reasonable assurance	Ernst Young LLP
Oak Hill Advisors	SOC10	Reasonable assurance	Reasonable assurance	RSM US LLP
Partners Group	ISAE 3402	Reasonable assurance	Reasonable assurance	PWC LLP
Ruffer LLP	ISAE 3402	Reasonable assurance	Reasonable assurance	Ernst Young LLP
Unigestion	ISAE 3402	Reasonable assurance	Reasonable assurance	KPMG LLP
Custodian				
Northern Trust	SOC10	Reasonable assurance	Reasonable assurance	KPMG LLP

Financial Performance

The Fund asset value increased by £42m to £1,052m as at 31 March 2019 due to the continued recovery in global markets since the uncertainty of 2016/17.

The triennial revaluation was completed in 2016/17 showing an improvement in the overall funding level to 88% compared to 83% in 2013. However, funding levels for different employers vary significantly. To improve funding levels, the Council's medium-term financial plan already assumes an increase in employer contributions, which in combination with other employers, will improve the overall funding level over the next three years.

The next triennial revaluation will take place in 2019 and will set employer contribution rates from 2020/21 onwards.

ANALYTICAL REVIEW – FUND ACCOUNT

	2015/16	2016/17	2017/18	2019/20
Fund account	**£'000**	**£'000**	**£'000**	**£'000**
Dealings with members				
Contributions	(30,617)	(32,274)	(33,454)	(36,386)
Pensions	37,858	40,770	42,827	48,846
Net (additions)/withdrawals from dealings with members	**7,241**	**8,496**	**9,373**	**12,460**
Management expenses	7,762	6,530	4,503	6,199
Net investment returns	(12,631)	(12,799)	(10,283)	(11,967)
Change in market value	9,784	(148,740)	(10,384)	(49,142)
Net (increase)/decrease in the Fund	**12,156**	**(146,513)**	**(6,791)**	**(42,450)**

Over the four-year period, pensions paid have exceeded contributions received by £38m in total. This reflects the maturity of the Fund membership in that there are fewer contributors than beneficiaries, although increased deficit recovery contributions in 2018/19 would have reduced this.

Net investment returns in 2018/19 remained healthy, increasing by £1.7m from the previous year, however, this was still lower than the returns from the earlier years. The Fund’s market value increase by £50m in 2018/19, as the financial markets experienced continued growth in the longest bull environment in recent memory.

Both officers and the Pensions Sub-Committee monitor investment performance closely and refer to independent investment advisers as necessary to ensure the Fund’s investments are being managed effectively.

Financial Performance (continued)

ANALYTICAL REVIEW – NET ASSET STATEMENT

	2015/16	2016/17	2017/18	2019/20
Net Asset Statement	£'000	£'000	£'000	£'000
Bonds	36,771	-	-	-
Equities	136,937	112,475	150	150
Pooled investment vehicles	671,300	834,828	998,141	1,034,851
Commodities	1,976	-	-	-
Derivatives	(368)	-	-	-
Cash deposits	7,544	7,856	6,168	12,843
Other	1,504	486	35	34
Total Investment Assets	**855,664**	**1,002,682**	**1,004,494**	**1,047,878**
Current assets	1,842	4,373	6,420	5,396
Current Liabilities	(1,187)	(4,223)	(1,291)	(1,201)
Net (increase)/decrease in the Fund	856,319	1,002,832	**1,009,623**	**1,052,073**

The points to note are:

- 95% of pooled investment vehicles comprise equity and fixed income shareholdings both domestic and overseas, while the remaining 5% is in property pooled funds. (95% and 5% respectively in 2017/18).
- The overall value of pooled investment vehicles increased by £163m (16%) during the year.

Further details are given in the Investment Policy and Performance Section.

Financial Performance (continued)

ANALYSIS OF DEALINGS WITH SCHEME MEMBERS

	2015/16	2016/17	2017/18	2019/20
Contributions receivable	£'000	£'000	£'000	£'000
- Members	(6,795)	(6,937)	(6,781)	(7,157)
- Employers	(22,412)	(22,494)	(24,268)	(25,074)
- Transfers in	(1,375)	(2,090)	(3,012)	(2,934)
- Other	(35)	(753)	607	(1,221)
Total Income	(30,617)	(32,274)	**(33,454)**	**(36,386)**

	2015/16	2016/17	2017/18	2019/20
Benefits Payable	£'000	£'000	£'000	£'000
- Pensions	29,076	30,002	31,465	32,912
- Lump sum retirements and death benefits	5,536	5,685	7,256	8,167
- Transfers out	3,230	5,046	4,086	7,726
- Refunds	16	37	20	41
Total Expenditure	37,858	40,770	42,827	48,846
Net Dealings with Members	7,241	8,496	9,373	12,460

The key variances were due to the following:

- Lump sums rose due to more members retiring than in previous years.
- Transfers out were higher because more members chose to transfer their benefits to another employer or remove them under the freedom of choice legislation.
- Transfers in were lower, reflecting fewer new starters joining the scheme and choosing to transfer in benefits on commencement of employment, than last year.

Financial Performance (continued)

ANALYSIS OF OPERATIONAL EXPENSES

The costs of running the pension fund are shown below.

	2015/16	2016/17	2017/18	2018/19
	£'000	£'000	£'000	£'000
Administration				
Employees	77	138	235	214
Supplies and services	527	381	165	132
Other Costs	2	1	3	2
Total Administration Costs	**606**	**520**	**403**	**348**
Governance and Oversight				
Employees	74	103	341	337
Investment advisory services	100	66	65	93
Governance and compliance	54	43	0	56
External audit	21	24	21	16
Actuarial fees	19	31	25	50
Total Governance and Oversight Costs	**268**	**267**	**452**	**552**
Investment Management				
Management fees	4,774	4,310	3,223	4,763
Performance fees	1,646	997	343	244
Transaction costs	73	382	44	185

	2015/16	2016/1
Custodian fees	395	54
Total Investment Management Fees	**6,888**	**5,743**
Total Operational Expenses	7,762	6,530

The Fund’s operational expenses have been on a gradual decline as it continues to aim to deliver value for money on its investments.

The Fund reported higher investment management fees in 2018/19 due to improved information from fund managers in relation to the fees deducted at source. This includes both annual investment and custody fees.

Administration Management Performance

The administration of the Fund is managed by Hammersmith and Fulham Council, but undertaken by Surrey County Council under a not-for-profit contractual arrangement operational from 1 September 2014.

PERFORMANCE INDICATORS

The contract with Surrey County Council includes several performance indicators included to ensure that service to members of the pension fund is effective. The targets are set out below, along with actual performance.

Performance Indicators	Target	P
Letter detailing transfer out quote	20 days	59%
Process refund and issue payment voucher	10 days	92%
Letter notifying estimate of retirement benefit	10 days	82%
Letter notifying actual retirement benefit	7 days	87%
Letter acknowledging death of member	5 days	100%
Letter notifying amount of dependant’s benefits	10 days	100%
Calculate and notify deferred benefits	20 days	70%

Performance has generally improved across the board due to improvements in staffing and the implementation process of the new online pension systems which has negatively affected performance last year. During the financial year ending 31 March

2019, there were no delays in processing pension payments and no impact on the accuracy of final calculations made.

ORBIS

The ORBIS on-line pension system is now in operation with a secure portal which enables members to:

- Update personal details
- Check membership records and calculate pension projections
- View payslips and P60s
- Nominate beneficiaries

Scheme employers can use the new system to:

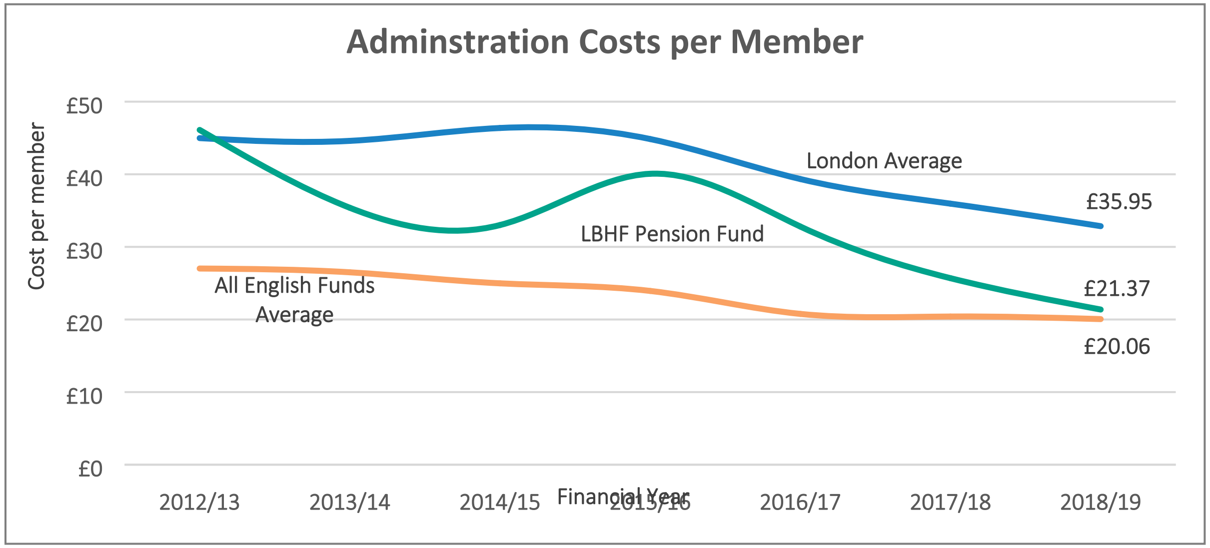
- Submit starter and leaver details and other changes online
- View and update employee details
- Run benefit calculations e.g. early retirements

COMPLAINTS RECEIVED

The pension administrators occasionally deal with members of the fund who dispute an aspect of their pension benefits. These cases are dealt with by the Internal Dispute Resolution Procedure (see section 4).

No new complaints have been lodged with the Ombudsman in 2018/19.

Administration Management Performance (continued)



STAFFING INDICATORS

The Pension Fund's cost of administration per member remains below the average for the London borough pension funds as shown in the chart. Administration costs are subject to regular review.

The administration of the Fund comprises of:

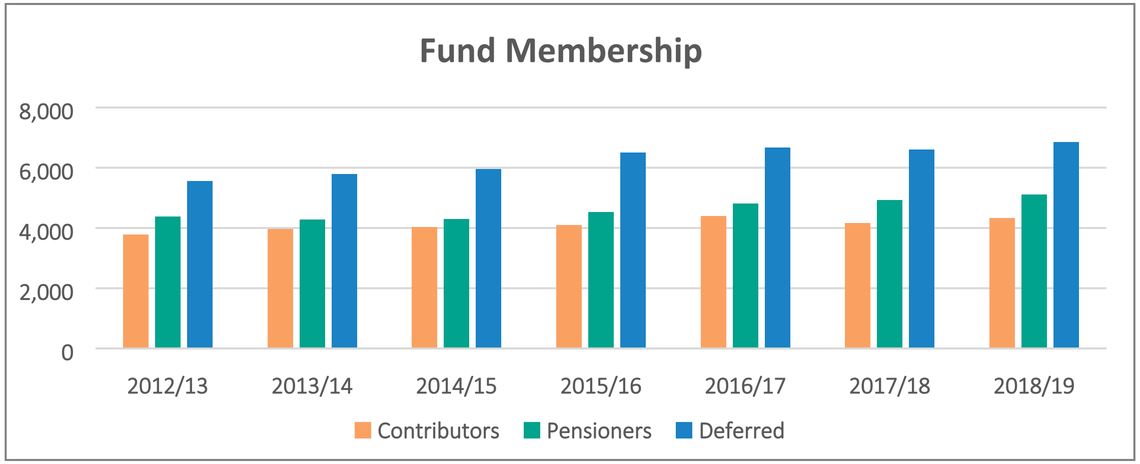
- 3 full-time equivalent (FTE) staff engaged by Surrey CC working directly on pension administration for Hammersmith and Fulham
- 1.8 FTE Hammersmith and Fulham HR staff to deal with internal administration.
- 1.93 FTE Westminster Finance staff assigned to the oversight and governance of the Pension Fund.

Administration Management Performance (continued)

MEMBERSHIP NUMBERS AND TRENDS

Overall membership has increased by 16% over the past 5 years from 14,017 to 16,046.

The introduction of auto-enrolment in 2013 and the increase in admitted employers has led to an increase in members contributing towards the Scheme. Nonetheless, the number of pensioners has continued to rise (20% in 2018/19) in common with other local government pension funds, reflecting the increasing maturity of the Fund.



ENHANCED BENEFITS

The total number of pensioners in receipt of enhanced benefits due to ill health or early retirement on the grounds of redundancy or efficiency of the service is given in the table across as at each year on 31 March.

Reason for leaving	2015/16	2016/17	2017/18	2018/19
Ill health retirement	10	10	6	4
Early retirement	36	29	18	20
	46	**39**	**24**	**24**

CONTRIBUTING EMPLOYERS AND CONTRIBUTIONS RECEIVED

The list below contains a list of the current active contributing employers and the contributions received in 2018/19. The employer's contributions figures include early retirement and deficit funding contributions.

Administering Authority Employer	Employees Contributions £000	Employers Contributions[1] £000	Total Contributions £000
London Borough of Hammersmith & Fulham	4,565	16,081	20,647
Addison Primary School	28	128	156
All Saints Church of England Primary School	10	44	54
Avonmore Primary School	7	31	38
Bayonne Nursery School	17	74	91
Brackenbury Primary School	29	125	154
Cambridge School	28	86	114
Flora Gardens Primary School	22	75	97
Holy Cross Catholic Primary School	33	142	175
Jack Tizard School	45	194	239
James Lee Nursery School	7	28	34
John Betts Primary School	9	35	44
Kenmont Primary School	12	52	64
Larmenier & Sacred Heart Catholic Primary School	33	106	139
Melcombe Primary School	31	138	169
Miles Coverdale Primary School	27	117	144
Normand Croft Community School	24	105	129
Old Oak Primary School	30	132	162
Queensmill School	99	435	534
Randolph Beresford Early Years Centre	60	251	311
Sir John Lillie Primary School	26	113	139
St Augustine's Primary School	14	63	77
St John XXIII Catholic Primary School	27	122	149
St John's Walham Green Church of England Primary School	22	97	119
St Mary's Catholic Primary School	10	4	50
St Paul's Catholic Primary School	23	102	125

[1] Includes early retirement and deficit contributions

Administering Authority Employer	Employees Contributions £000	Employers Contributions[1] £000	Total Contributions £000
St Peter's Church of England Primary School	16	71	87
St Stephens Church of England Primary School	35	156	191
St. Thomas of Canterbury Primary School	12	49	61
The Good Shepherd Primary School	17	80	97
Vanessa Nursery School	12	54	66
Wendall Park Primary School	26	112	138
William Morris Sixth Form School	52	212	264
Wood Lane High School	17	69	86
Wormholt Park Primary School	35	143	178
Total Contributions from Administering Authority	**5,460**	**19,862**	**25,322**

Administration Management Performance (continued)

SCHEDULED BODIES

The Fund provides pensions not only for employees of Hammersmith and Fulham Council, but also for the employees of several scheduled and admitted bodies.

Scheduled bodies are organisations which have a statutory right to be a member of the Local Government Pension Scheme under the regulations e.g. academy schools.

Scheduled Body	Employees Contributions £000	Employers Contributions[2] £000	Total Contributions £000
Ark Bentworth Primary Academy	14	38	52
Ark Burlington Danes Primary Academy	77	257	334
Ark Conway Primary Academy	13	59	72
Ark Swift Primary Academy	15	64	79
Bridge AP Academy	85	295	380
Fulham Boys School	29	98	127
Fulham College Boys' Academy	42	152	194
Fulham Cross Girls' Academy	52	168	220
Greenside Primary School	16	63	79
Hammersmith Academy	48	175	223
Hurlingham & Chelsea Academy	27	99	126
Lady Margaret School	45	158	203
Langford Primary School	7	24	31
Lena Gardens Primary School	10	41	51
London Oratory School	54	129	183
Mortlake Crematorium Board	22	58	80
Phoenix Academy	38	143	181
Sacred Heart High School	51	166	217
TBAP Trust	69	255	324
Thomas' Academy	17	66	83
West London Free School	83	261	344
Total Contributions from Scheduled Bodies	**814**	**2,769**	**3,583**

[2] Includes early retirement and deficit contributions

Administration Management Performance (continued)

ADMITTED BODIES

Admitted bodies participate in the pension scheme via an admission agreement made between the Council and the employing organisation. Examples of admitted bodies are not-for-profit organisations linked to the Council and contractors who have taken on delivery of services with Council staff also transferred to third parties.

Admitted Body	Employees Contributions £000	Employers Contributions[3] £000	Total Contributions £000
3BM	80	253	333
Abelian UK	-1	15	14
Agilisys	4	9	13
Amey	76	258	334
Birkin Clean	1	5	6
BT-IT Services	8	27	35
Caterlink	84	-69	15
CT Plus Transport	17	82	99
Disabilities Trust	1	4	5
Eden Food Services	83	331	414
Family Support Service	81	322	403
FM Conway	19	45	64
Fulham Palace Trust	10	34	44
HTC – Passenger Transport	11	42	53
Hestia	1	3	4
Idverde	8	25	33
London Hire Community Services	2	9	11
Medequip Assistive Technology	2	7	9
Mitie Property Services	80	239	319
Peabody Trust	14	44	58
Pinnacle PSG	81	270	351
Quadron Services	53	175	228
RM Education	3	5	8
Serco Group	185	462	647
Urban Partnership	20	63	83
Total Contributions from Admitted Bodies	**923**	**2,610**	**3,583**

[3] Includes early retirement and deficit contributions

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Administration Management Performance (continued)

EMPLOYER ANALYSIS

The following table summarises the number of employers in the fund analysed by scheduled bodies and admitted bodies which are active (with active members) and ceased (no active members but with some outstanding liabilities).

	Active	Ceased	Total
Administering Authority	1	-	1
Scheduled Bodies	21	3	24
Admitted Bodies	25	20	45
Total number of bodies	**47**	**23**	**70**

3. Investment Policy and Performance

Investment Policy

The Pensions Sub-Committee has set out a broad statement of the principles it has employed in establishing its investment and funding strategy in the Investment Strategy Statement (ISS).

The ISS sets out responsibilities relating to the overall investment policy of the Fund including:

- asset allocations
- restrictions on investment types
- methods of investment management
- performance monitoring

The ISS also sets out the Fund's approach to responsible investment and corporate governance issues, and how the Fund demonstrates compliance with the "Myners Principles".

These Principles are a set of recommendations relating to the investment of pension funds originally prepared by Lord Myners in 2001 and subsequently endorsed by Government. The current version of the Myners Principles covers the following areas:

- effective decision making
- clear objectives
- risk & liabilities
- performance measurement
- responsible ownership
- transparency and reporting

The Fund's ISS has been included in this report as Appendix 4.

For 2018/19, the LGPS (Management and Investment of Funds) Regulations 2016, requires the Fund to publish an ISS.

The ISS addresses each of the objectives included in the 2016 Regulations, namely:

- The administering requirement to invest fund money in a wide range of instruments.
- The administering authority's assessment of the suitability of particular investments and types of investment.
- The administering authority's approach to risk, including the ways in which risks are to be measured and managed.
- The administering authority's approach to pooling investments, including the use of collective investment vehicles.
- The administering authority's policy on how environmental, social and corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments.

Any queries relating to the Fund's investment policy should be addressed to:

Tri-Borough Pensions Team
16th Floor
64 Victoria Street
London
SW1E 6QP

Email: *pensionfund@lbhf.gov.uk*

Asset Allocation

The strategic asset allocation is agreed by the Pensions Sub-Committee and the Fund's advisers. The allocation during the year ended 31 March 2019 was as follows:

Asset Class	Target Allocation
Global Equities	30.0%
UK Equities	15.0%
Fixed Income	32.5%
Multi Asset	10.0%
Infrastructure	7.5%
Long Lease Property	5.0%
Total	**100.0%**

The Pensions Sub-Fund Committee holds Fund Managers accountable for decisions on asset allocation within the Fund mandate that they operate under. To follow the Myners' Committee recommendation, Fund Managers are challenged deliberately and formally about asset allocation decisions.

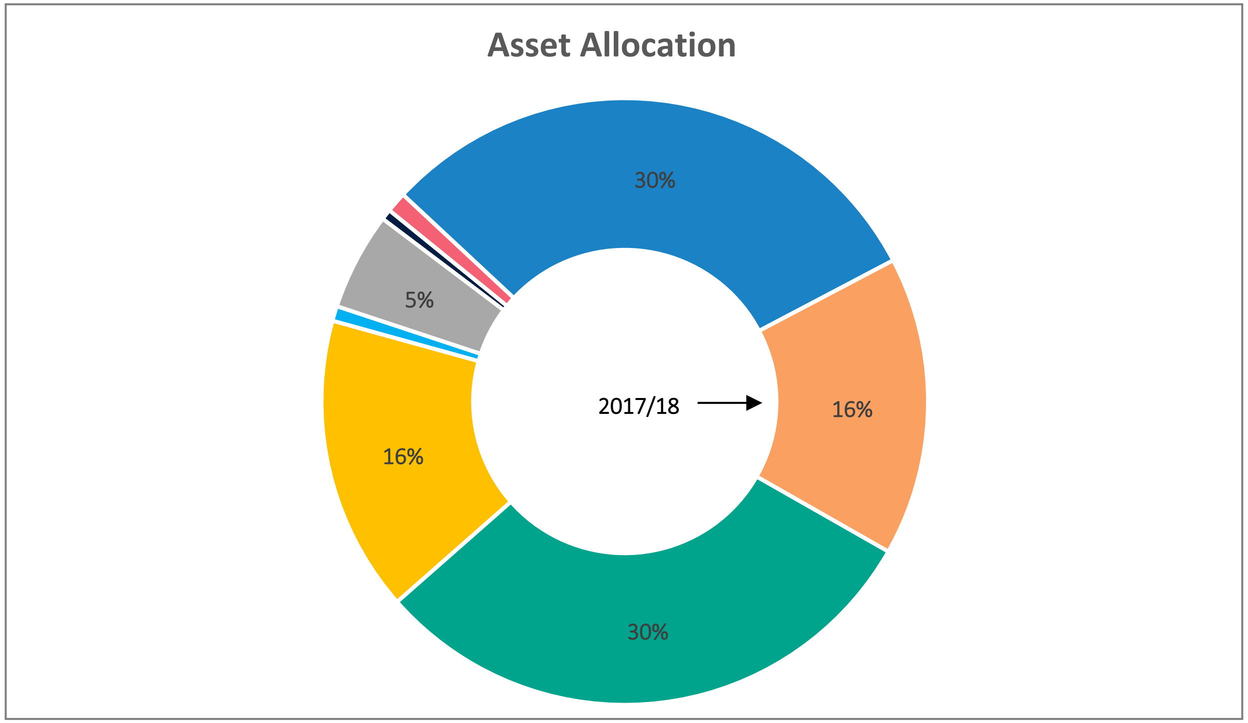
Investment portfolios are reviewed at each Committee meeting in discussion with the Investment Adviser and Officers, and Fund Managers are called to a Sub-Committee meeting if there are issues that need to be addressed. Officers meet Fund Managers regularly and advice is taken from the Investment Advisor on matters relating to fund manager arrangement and performance.

Fund managers provide a rationale for asset allocation decisions based upon their research resource to ensure that they are not simply tracking the peer group or relevant benchmark index. The Fund's asset allocation strategy can be found in the ISS.

The asset allocation of the Pension Fund at the start and end of the financial year are set out below.

These figures are based on market value and reflect the relative performance of investment markets and the impact of tactical asset allocation decisions made by the Pensions Sub-Committee.

At 31 March 2019, the fund had an overweight allocation to cash due to assets in transit. This cash is intended to be allocated to fixed income in 2019/20.



Asset Allocation (continued)

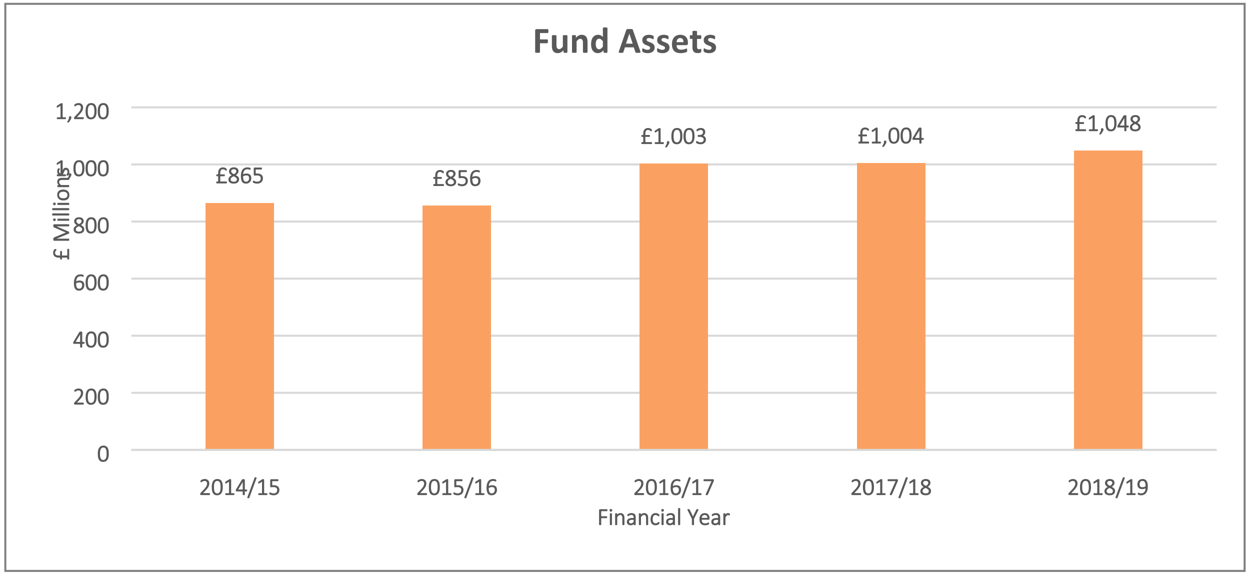
FUND VALUE

The net asset value of the Fund has more than doubled over the past ten years with 21% of the growth coming within the last five years.

In 2015/16, the Fund experienced a slight fall in assets due to the uncertainty around the strength of the global economy and China in particular, but the Fund recovered well and has continued to grow steadily since.

Despite a challenging year politically and economically markets, the Fund increased in value by 4.4% in 2018/19.

The Fund is invested to meet liabilities over the medium to long-term and therefore its performance should be judged over a corresponding period. Annual returns can be volatile and do not necessarily indicate the underlying health of the Fund.

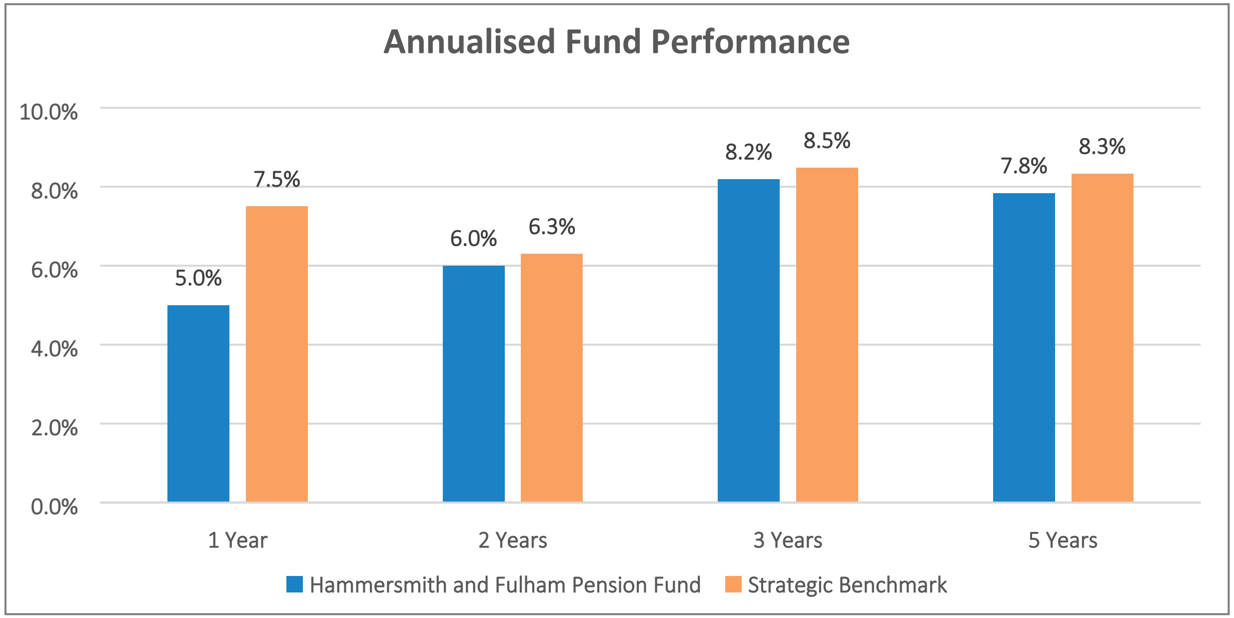


Investment Performance

In 2018/19, the Fund's investments grew by 5.0% (1.7% in 2017/18) to £1.05bn. This was below the average LGPS return of 6.6%.

Performance of the Fund is measured against an overall strategic benchmark. Below this, each fund manager is assigned individual performance targets which are linked to index returns for the assets they management, e.g. FTSE All Share for UK equities. Details of these targets can be found in the Statement of Investment Principles.

The chart below shows the annualised fund performance over different time periods. Overall, the Fund has underperformed strategic benchmark across the different periods with an underperformance of 2.5% in 2018/19.



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2018/19 has been a challenging year for the global markets. It has been rife with global political uncertainty, a burgeoning trade war and no resolution to the Brexit issue.

This had a negative impact on a few of the investment strategies which underperformed their strategic benchmarks.

However, over the last ten years, the Fund has experienced lower than average level of volatility while achieving an average return rate. This demonstrates the effectiveness of the Fund's risk management strategy.

Investment Performance (continued)

The overall performance of each manager is measured over rolling three-year or five-year periods, as inevitably there will be short-term fluctuations in performance.

There were a couple new strategies entered during the year; these have been measured on their performance since inception.

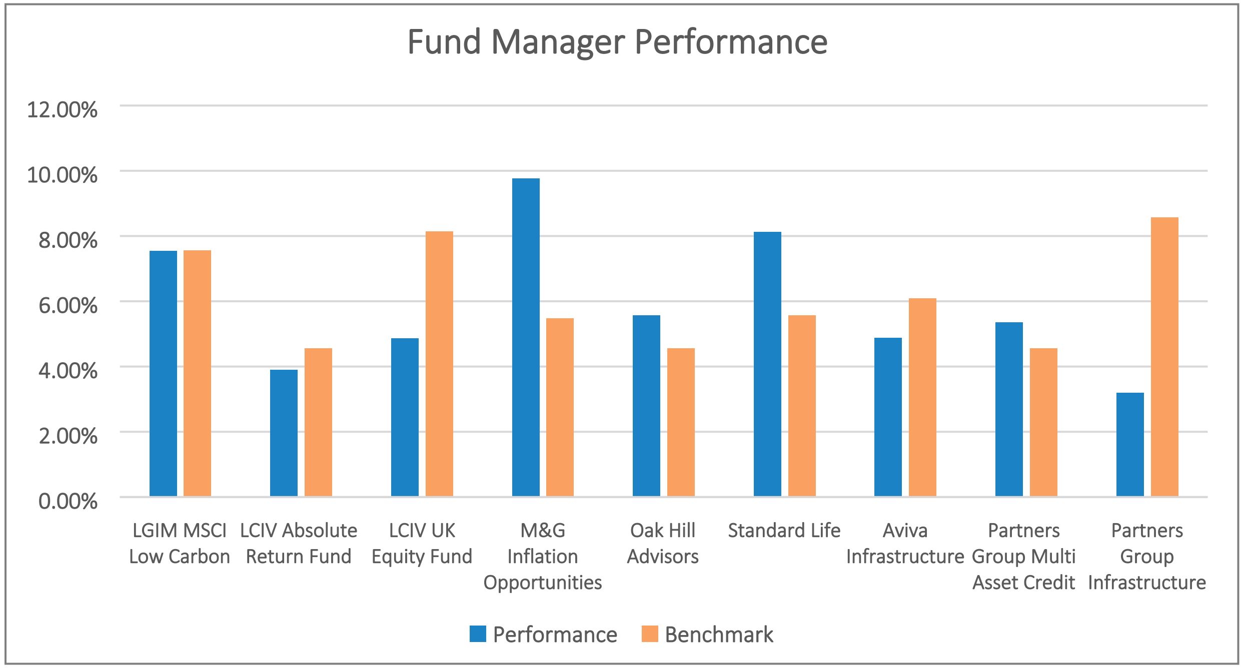
Partners Group Infrastructure is still deploying capital and returns are expected to be low compared to the benchmark until the full commitment has been drawn down.

The portfolio is a mixture of active and passively managed asset classes:

- Targets for active fund mandates are set to outperform the benchmark by a set percentage through active stock selection and asset allocation.
- Targets for passive funds are set to achieve the benchmark through investment in a stable portfolio.

The table on the below shows the portfolio mixture of the fund.

Active	Passive
London LGPS CIV Ltd	**Legal & General Investment Management**
LCIV Absolute Return Fund (Ruffer) LCIV UK Equity Fund (Majedie)	MSCI Low Carbon Tracker Fund
Partners Group	**M & G Investments**
Private Multi Asset Credit Infrastructure	Inflation Opportunities Fund
Aviva Investors	**Aberdeen Standard**
Infrastructure	Long Lease Property Fund
Oak Hill Advisors	



Corporate Governance

RESPONSIBLE INVESTMENT POLICY

The Council has a paramount fiduciary duty to obtain the best possible financial return on Fund investments without exposing assets to unnecessary risk. It believes that following good practice in terms of environmental, social and ethical issues is generally likely to have a favourable effect on the long-term financial performance of a company and will improve investment returns to its shareholders.

The Fund investment managers, acting in the best financial interests of the Fund, are expected to consider, amongst other factors, the effects of environmental, social and ethical issues on the performance of a company when undertaking the acquisition, retention or realisation of investments for the Fund.

In line with this policy, in 2018/19 the Fund decided to investment its entire passive equity allocation into a low carbon index fund. Additionally, the fund has used infrastructure funds to invest in sustainable technologies such solar and wind power.

The Council's investment managers have adopted socially responsible investment policies which are subject to regular review both by officers and by the Council's Pensions Sub-Committee.

PROFESSIONAL BODIES

The Council is a member of the CIPFA Pensions Network which provides a central coordination point for all LGPS funds and local authority members.

CIPFA staff and the network more generally can advise subscribers on all aspects of pensions and related legislation. Relevant training and seminars are also available to officers and members of participating funds.

While the Fund is a member of the Pensions Lifetime and Savings Association (formerly the National Association of Pension Funds), it does not subscribe to nor is it a member of the Local Authority Pension Fund Forum, UK Sustainable Investment & Finance Association or the Institutional Investors Group on Climate change or any other bodies.

VOTING

Fund Managers have the delegated authority to vote at shareholder meetings in accordance with their own guidelines, which have been discussed and agreed with the Pensions Sub-Committee. The Committee keeps under close review the various voting reports that it receives from Fund managers.

COLLABORATIVE VENTURES

The Fund has been working closely with other London LGPS funds in the London Collective Investment Vehicle set up to enable greater buying power, reduced fees and enhanced governance arrangements.

The Hammersmith and Fulham Pension Fund is a shareholder in London LGPS CIV Limited and had about 65% of assets invested with the pool as at 31 March 2019.

Corporate Governance (continued)

SEPARATION OF RESPONSIBILITIES

The Fund has appointed Northern Trust as its global custodian, which is independent to the investment managers and responsible for the safekeeping of all the Fund's investments. Northern Trust are also responsible for the settlement of all investment transactions and the collection of income.

The Fund's bank account is held with NatWest Bank. This is used for the operation functions of the Fund which include receiving contributions from employers and paying out benefits to members.

The actuary is responsible for assessing the long-term financial position of the pension fund and issues a Rates and Adjustments statement following their triennial valuation of the Pension Fund, which sets out the minimum contributions which each employer in the Scheme is obliged to pay over the following three years.

STEWARDSHIP CODE

The Pensions Sub-Committee believes that investor stewardship is a key component of good governance and is committed to exercising this responsibility with the support of its investment managers. In line with this approach, all of the Fund's equity investment managers are signatories to the UK Stewardship Code.

The Pensions Sub-Committee believes that companies should be accountable to shareholders and should be structured with appropriate checks and balances so as to safeguard shareholders' interests and deliver long-term returns.

The Pensions Sub-Committee encourages Fund Managers to consider a range of factors before making investment decisions, such as the company's historical financial performance, governance structures, risk management approach, the degree to which strategic objectives have been met and environmental and social issues. Such considerations may also be linked to voting choices at company AGMs.

The Pensions Sub-Committee's role is not to micro-manage companies but provide perspective and share with boards and management our priorities for investment and approach to corporate governance. The aim is to work with management, shareholders and stakeholders to bring about changes that enhance long-term performance.

FUNDING STRATEGY STATEMENT

The Funding Strategy Statement (Appendix 3) sets out the aims and purpose of the pension fund and the responsibilities of the administering authority regarding funding the scheme.

Its purpose is:

- To establish a clear and transparent fund-specific strategy to identify how employers' pension liabilities are best met going forward;
- To support the regulatory requirement to maintain as nearly constant employer contribution rates as possible;
- To take a prudent longer-term view of funding those liabilities.

4.

Scheme Administration

Scheme Administration

SERVICE DELIVERY

Although the LGPS is a national scheme, it is administered locally. Hammersmith and Fulham Council has a statutory responsibility to administer the pension benefits payable from the Pension Fund on behalf of the participating employers and the past and present members and their dependents.

The Council administers the scheme for 70 employers (a complete list of employers is provided in section 2). These employers include not only the Council, but also academy schools within the borough and a small number of organisations linked to the Council which have been "admitted" to the pension fund under agreement with the Council.

A not-for-profit contractual arrangement is in place with Surrey County Council for the provision of pension administration services. Performance of this service against targets within the contract is reported on page 19. The Council's Human Resources provide oversight of the administration service.

COMMUNICATION POLICY STATEMENT

The Local Government Pension Scheme Regulations 2013 require Pension Funds to prepare, publish and maintain a communication policy statement, which can be found on page 101. The Communication Policy details the overall strategy for involving stakeholders in the pension fund. A key part of this strategy is a dedicated pension fund website, which includes a great deal more information about the benefits of the pension fund and this can be accessed via the following link:

www.lbhfpensionfund.org

INTERNAL DISPUTE RESOLUTION PROCEDURE

Members of pension schemes have statutory rights to ensure that complaints, queries and problems concerning pension rights are properly resolved. To facilitate this process, an Internal Disputes Resolution Procedure (IDRP) has been established. While any complaint is progressing, fund members are entitled to contact The Pensions Advisory Service (TPAS), who can provide free advice.

IDRP Stage 1 involves making a formal complaint in writing. This would normally be considered by the body that made the decision in question. If the fund member is not satisfied with actions taken at Stage 1 the complaint will progress to Stage 2.

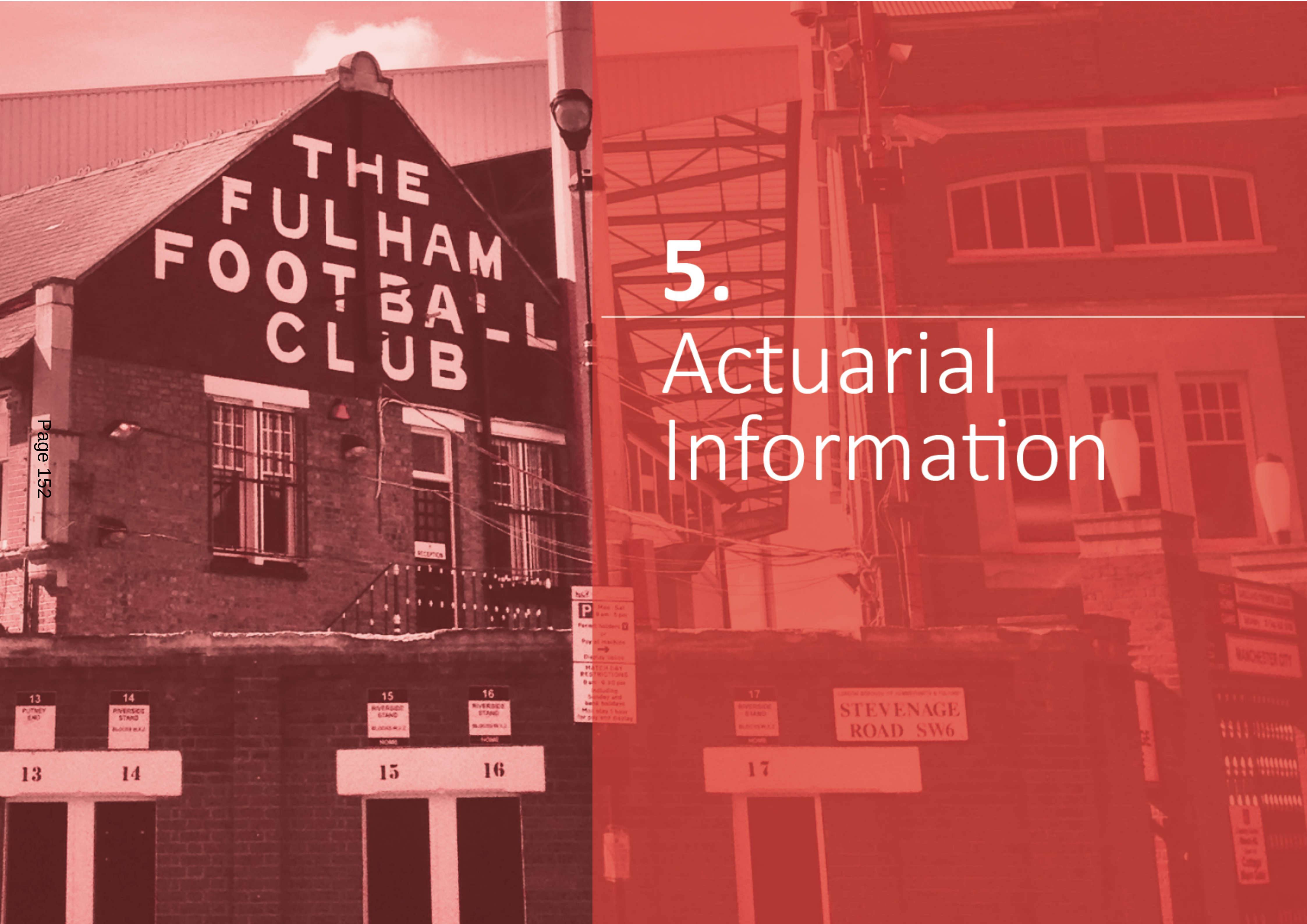
IDRP Stage 2 involves a referral to the administering authority, Hammersmith and Fulham Council to take an independent view.

IDRP Stage 3 is a referral of the complaint to the Pension Ombudsman.

No complaints have been received or referred to the Pensions Ombudsman in 2018/19.

Both TPAS and the Pensions Ombudsman can be contacted at:

11 Belgrave Road
Pimlico
London
SW1V 1RB



5.

Actuarial Information

Report by Actuary

INTRODUCTION

The last full triennial valuation of the Hammersmith and Fulham Pension Fund (“the Fund”) was carried out as at 31 March 2016 in accordance with the Funding Strategy Statement of the Fund. The results were published in the triennial valuation report dated March 2017.

This statement gives an update on the funding position as at 31 March 2019 and comments on the main factors that have led to a change since the full valuation.

2016 VALUATION

The results for the Fund at 31 March 2016 were as follows:

- The Fund as a whole had a funding level of 88% i.e. the assets were 88% of the value that they would have needed to be to pay for the benefits accrued to that date, based on the assumptions used. This corresponded to a deficit of £114m which is lower than the deficit at the previous valuation in 2013.
- To cover the cost of new benefits a total contribution rate of 15.5% of pensionable salaries would be needed.
- The contribution rate for each employer was set based on the annual cost of new benefits plus any adjustment required to pay for their share of the deficit.
- Full details of all the assumptions underlying the valuations are set out in our valuation report.

UPDATED POSITION

Using assumptions consistent with those adopted at the 2016 valuation, we estimate that the funding position at 31 March 2019 has improved compared with the position as at 31 March 2016.

The next formal valuation will be carried out as at 31 March 2019 with new contribution rates set from 1 April 2020.

Graeme Muir FFA

Partner, Barnett Waddingham LLP

6.
Pension Fund Accounts

Statement of Responsibilities

Responsibility for the Financial Statements, which form part of this Annual Report, is set out in the following declaration.

THE COUNCIL'S RESPONSIBILITIES

The Council is required to:

- make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs, in line with statute this is the Strategic Director of Finance;
- manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets;
- approve the Statement of Accounts.

RESPONSIBILITIES OF THE STRATEGIC DIRECTOR OF FINANCE

The Strategic Director of Finance and Governance is responsible for the preparation of the Pension Fund Statement of Accounts in accordance with proper practices as set out in the CIPFA/LASAAC 2017/18 Code of Practice on Local Authority Accounting in the United Kingdom (the Code).

In preparing these Statements of Accounts, the Strategic Director of Finance and Governance has:

- selected suitable accounting policies and then applied them consistently
- made judgments and estimates that were reasonable and prudent;
- complied with the Code of Practice on Local Authority Accounting.

The Strategic Director of Finance and Governance has also:

- kept proper accounting records which were up to date;
- taken reasonable steps for the prevention and detection of fraud and other irregularities
- assessed the authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern
- Used the going concern basis of accounting on assumption that the functions of the authority will continue in operational existence for the foreseeable future.
- Maintained such internal control as they determine as necessary to enable the preparation of financial statements free from material misstatement, whether due to fraud or error.

CERTIFICATE OF THE STRATEGIC DIRECTOR OF FINANCE

I certify that the Statement of Accounts (set out on pages 42 to 78) present a true and fair view of the financial position of the London Borough of Hammersmith and Fulham Pension Fund as at 31 March 2019 and income and expenditure for the year for the financial year 2018/19.

Hitesh Jolapara
Strategic Director of Finance and Governance
Section 151 Officer

Date:

Independent Auditors Report

Independent auditor's report to the members of the London Borough of Hammersmith and Fulham Pension Fund on the pension fund financial statements published with the pension fund annual report

Please note that this report is subject to change once the auditors have completed the audit of the Pension Fund's Statement of Accounts.

We have audited the pension fund financial statements of Hammersmith and Fulham Council (the "Authority") for the year ended 31 March 2017 under the Local Audit and Accountability Act 2014 (the "Act"). The pension fund financial statements comprise the Fund Account, the Net Assets Statement and the related notes. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Act and as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited.

Our audit work has been undertaken so that we might state to the members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

RESPECTIVE RESPONSIBILITIES OF THE STRATEGIC DIRECTOR OF FINANCE AND THE AUDITOR

As explained more fully in the Statement of the Strategic Finance Director's Responsibilities, the Strategic Director of Finance is responsible for the preparation of the Authority's Statement of Accounts, which include the pension fund financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17, and for being satisfied that they give a true and fair view. Our responsibility is to audit and express an opinion on the pension fund financial statements in accordance with applicable law and International Standards on Auditing (UK and Ireland). Those standards require us to comply with the Auditing Practices Board's Ethical Standards for Auditors.

Independent Auditors Report (continued)

SCOPE OF THE AUDIT OF THE PENSION FUND FINANCIAL STATEMENTS

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of whether the accounting policies are appropriate to the pension fund's circumstances and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Strategic Director of Finance; and the overall presentation of the pension fund financial statements. In addition, we read all the financial and non-financial information in the Authority's Statement of Accounts to identify material inconsistencies with the audited pension fund financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by us in the course of performing the audit. If we become aware of any apparent material misstatements or inconsistencies, we consider the implications for our report.

OPINION ON THE PENSION FUND FINANCIAL STATEMENTS

In our opinion the pension fund financial statements:

- give a true and fair view of the financial transactions of the pension fund during the year ended 31 March 2017 and of the amount and disposition at that date of the fund's assets and liabilities; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 and applicable law.

OPINION ON OTHER MATTERS

In our opinion, the other information published together with the audited pension fund financial statements in the Authority's Statement of Accounts is consistent with the pension fund financial statements.

[NAME]

for and on behalf of Grant Thornton, Appointed Auditor

Grant Thornton

[ADDRESS]

[DATE]

Pension Fund Accounts and Explanatory Notes

FUND ACCOUNT

2017/18		Notes	2018/19
£'000			£'000
	Dealings with members, employers and other directly involved in the fund		
	Contributions		
(24,268)	From Employers	7	(25,074)
(6,781)	From Members	7	(7,157)
(3,012)	Individual Transfers in from Other Pension Funds		(2,934)
607	Other income		(1,221)
(33,454)	**Total Contributions**		**(36,386)**
	Benefits		
31,465	Pensions	8	32,912
7,256	Commutation, Lump Sum Retirement and Death Benefits	8	8,167
	Payments to and on account of leavers		
4,086	Individual Transfers Out to Other Pension Funds		7,726
20	Refunds to Members Leaving Service		41
42,827	**Total Benefits**		**48,846**
9,373	**Net Additions (Withdrawals) from dealings with members**		**12,460**

Pension Fund Accounts and Explanatory Notes (continued)

FUND ACCOUNT

2017/18		Notes	2018/19
4,503	Management expenses	9	6,199
	Returns on Investment		
(10,283)	Investment Income	10	(11,967)
(10,384)	(Profit) and losses disposal of investments and changes in value of investments	12	(49,142)
(20,667)	Net Return on Investments		(61,109)
(6,791)	Net (Increase)/Decrease in the net assets available for benefits during the year		(42,450)
(1,002,832)	Opening Net Assets of the Scheme		(1,009,623)
(1,009,623)	Closing Net Assets of the Scheme		(1,052,073)

Pension Fund Accounts and Explanatory Notes (continued)[4]

NET ASSETS STATEMENT

2017/18		Notes	2018/19
£'000			£'000
	Investment Assets		
150	Equities	12	150
51,933	Pooled Property Vehicles	12	55,558
890,947	Pooled Investment Vehicles	12	902,851
55,261	Private Equity/Infrastructure	12	76,442
6,168	Cash Deposits	12	12,843
	Other Investment Balances		
35	Investment income due	12	34
1,004,494	Net Investment Assets		1,047,878
2,059	Current Assets	20	2,723

[4] The Fund's financial statements do not take account of liabilities to pay pensions and other benefits after the period end. The actuarial present value of promised retirement benefits is disclosed in Note 19.

2017/18		Notes	2018/19
(1,291)	Current Liabilities	21	(1,201)
4,361	Cash Balances (held directly by Fund)		2,673
1,009,623	**Net assets of the Fund available to fund benefits at the period end**		**1,052,073**

Note 1 Description of Hammersmith and Fulham Pension Fund

A. GENERAL

The Pension Fund (the Fund) is part of the Local Government Pension Scheme (LGPS) and is administered by Hammersmith and Fulham Council. It is a contributory defined benefits scheme established in accordance with statute, which provides for the payment of benefits to employees and former employees of Hammersmith and Fulham Council and the admitted and scheduled bodies in the Fund. These benefits include retirement pensions and early payment of benefits on medical grounds and payment of death benefits where death occurs either in service or in retirement. Teachers are excluded from this scheme as they are administered under the Teachers' Pension Scheme.

The benefits payable in respect of service from 1 April 2014 are based on an employee's career average revalued earnings (CARE) and the number of years of eligible service. The benefits payable in respect of service prior to 1 April 2014 are based on an employee's final salary and the number of years eligible service. Pensions are increased each year in line with the Consumer Price Index.

The Fund is governed by the Public Service Pensions Act 2013 and the following secondary legislation:

- The LGPS Regulations 2013 (as amended)
- The LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended) and
- The LGPS (Management and Investment of Funds) Regulations 2016.

The Fund is financed by contributions from employees, the Council, the admitted and scheduled bodies and from investment returns on the Fund's investment assets. Contributions from employees are made in accordance with the Local Government Pension Scheme Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ending 31 March 2019. Employer contributions are set based on the triennial actuarial funding valuation, as detailed in Note 19.

B. PENSIONS SUB-COMMITTEE

The Council has delegated the investment arrangements of the scheme to the Audit, Pensions and Standards Committee, who in December 2014 formed a Pensions Sub-committee and delegated all pensions responsibilities to it. The sub-committee decides on the investment strategy most suitable to meet the liabilities of the Fund and has responsibility for the investment strategy. The sub-committee is made up of 5 members, 4 of whom are elected representatives of the Council and one co-opted member, each having voting rights. Members of the admitted bodies and representatives of the Trade Unions may attend the sub-committee meetings but have no voting rights.

The sub-committee reports annually to the Audit, Pensions and Standards Committee and has full delegated authority to make investment decisions. The sub-committee obtains and considers advice from the Strategic Director of Finance and Governance, and as necessary from the Fund's appointed actuary, investment managers and adviser.

C. PENSION BOARD

In line with the provisions of the Public Service Pensions Act 2013, the Council has set up a Local Pension Board to oversee the governance arrangements of the Pension Fund. The Board meets twice a year and has its own Terms of Reference. Board members are independent of the Pensions sub-committee.

Note 1 Description of Hammersmith and Fulham Pension Fund (continued)

D. INVESTMENT PRINCIPLES

In accordance with the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 the Sub-Committee approved an Investment Strategy on 23 July 2018 (available on the Council's website). The Statement shows the Authority's compliance with the Myner's principles of investment management.

The Sub-committee has delegated the management of the Fund's investments to regulated investment managers (see note 11), appointed in accordance with the regulations, and whose activities are specified in detailed investment management agreements and monitored on a quarterly basis.

E. MEMBERSHIP

Membership of the LGPS is voluntary and employees, whilst auto-enrolled into the scheme, are free to choose whether to stay in or leave the scheme, or make their own personal arrangements outside the scheme.

Organisations participating in the Hammersmith & Fulham Pension Fund include:

- Scheduled bodies, which are local academies and similar bodies whose staff are automatically entitled to be members of the Fund.
- Admitted bodies, which are other organisations that participate in the Fund under an admission agreement between the Fund and the relevant organisation. Admitted bodies include voluntary, charitable and similar bodies and private contractors undertaking a local authority function following outsourcing to the private sector.

The Deferred member numbers include 1,204 undecided leavers, who are no longer paying contributions or in receipt of benefits.

31 March 2018		31 March 2019
45	Number of active employers	45
4,166	Contributing employees	4,332
4,920	Pensioners receiving benefit	5,111
6,603	Deferred pensioners	6,840
15,689	**Total members**	**16,283**

Details of the scheduled and admitted bodies are in Section 2 of this report.

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Note 2 Basis of Preparation of Financial Statements

The Statement of Accounts summarise the Fund's transactions for 2018/19 and its position at year end as at 31 March 2019. The accounts been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2018/19 (the Code) issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) which is based upon International Financial Reporting Standards (IFRS) as amended for the UK public sector.

The accounts have been prepared on an accruals basis, apart from transfer values which have been accounted for on a cash basis.

The accounts do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year, nor do they consider the actuarial present value of promised retirement benefits. The Code gives administering authorities the option to disclose this information in the Net Asset Statement, in the notes to the accounts or by appending an actuarial report prepared for this purpose. The Authority has opted to disclose this information in a note to the accounts (Note 19). The Pension Fund Accounts have been prepared on a going concern basis.

Note 3 Summary of Significant Accounting Policies

FUND ACCOUNT – REVENUE RECOGNITION

A. CONTRIBUTION INCOME

Normal contributions, both from active members and from the employer, are accounted for on an accruals basis at the percentage rate recommended by the actuary in the payroll period to which they relate. Employer deficit funding contributions are accounted for on the due dates on which they are due under the schedule of contributions set by the actuary or on receipt if earlier than the due date.

B. TRANSFERS TO AND FROM OTHER SCHEMES

Transfer values represent the amounts received and paid during the year for members who have either joined or left the Fund during the financial year and are calculated in accordance with the LGPS Regulations. Individual transfers in/out are accounted for when received/paid, which is normally when the member liability is accepted or discharged.

C. INVESTMENT INCOME

Investment income arising from the underlying investments of the Pooled Investment Vehicles is either reinvested within the Pooled Investment Vehicles and reflected in the unit price or taken as a cash dividend to support the Fund's outgoing cash flow requirements.

Interest income is recognised in the fund account as it accrues, using the effective interest rate of the financial instrument as at the date of acquisition or origination.

Distributions from pooled funds are recognised at the date of issue. Any amount not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset. Where the amount of an income distribution has not been received from an investment manager by the balance sheet date, an estimate based upon the market value of their mandate at the end of the year is used.

Changes in the value of investments are recognised as income and comprise all realised and unrealised profits and losses during the year.

Note 3 Summary of significant accounting policies (continued)

FUND ACCOUNT – EXPENSE ITEMS

D. BENEFITS PAYABLE

Pensions and lump-sum benefits payable include all amounts known to be due as at the end of the financial year. Lump sums are accounted for in the period in which the member becomes a pensioner. Any amounts due but unpaid are disclosed in the Net Assets Statement as current liabilities.

E. TAXATION

The Fund is a registered public service scheme under Section 1(1) of Schedule 36 of the Finance Act 2004 and as such is exempt from UK income tax on interest received and from capital gains tax on the proceeds of investments sold. As the Council is the administering authority for the Fund, VAT input tax is recoverable on all Fund activities including expenditure on investment expenses. Where tax can be reclaimed, investment income in the accounts is shown gross of UK tax. Income from overseas investments suffers withholding tax in the country of origin, unless exemption is permitted. Irrecoverable tax is accounted for as a fund expense as it arises

F. VSP, MSP AND LIFE TIME ALLOWANCE

Members are entitled to request that the Pension Fund pays their tax liabilities due in respect of annual allowance and life time allowance in exchange for a reduction in pension. Where the Fund pays member tax liabilities direct to HMRC, it is treated as an expense in the year in which the payment occurs.

G. MANAGEMENT EXPENSES

The fund discloses its pension fund management expenses in accordance with the CIPFA guidance "Accounting for Local Government Pension Scheme Management Expenses 2016".

- **Administrative expenses** – All staff costs of the pension administration team are charged direct to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund.
- **Oversight and governance** – All staff costs associated with governance and oversight are charged direct to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund. The cost of obtaining investment advice from the external advisor is included in oversight and governance costs.
- **Investment management expenses** – The Sub-Committee has appointed external investment managers to manage the investments of the Fund. Managers are paid a fee based on the market value of the investments they manage, and/or a fee based on performance.

Where an investment manager's fee note has not been received by the Balance Sheet date, an estimate based upon the market value of the mandate as at the end of the year is used for inclusion in the fund account.

Note 3 Summary of significant accounting policies (continued)

NET ASSET STATEMENT

H. FINANCIAL ASSETS

Financial assets are included in the net assets statement on a fair value basis as at the reporting date. A financial asset is recognised in the net asset statement on the date the Fund becomes party to the contractual acquisition of the asset. From this date any gains or losses arising from changes in the value of the asset are recognised in the Fund account.

The values of investments as shown in the net asset statement have been determined at fair value in accordance with the requirements of the Code and IFRS 13 (see Note 14a).

I. DERIVATIVES

The Fund uses derivative financial instruments to manage its exposure to specific risks arising from its investment activities. The Fund does not hold derivatives for speculative purposes (see Note 14a).

J. FOREIGN CURRENCY TRANSACTIONS

Dividends, interest and purchases and sales of investments in foreign currencies have been accounted for at the spot market rates at the date of the transaction. End of year spot market exchange rates are used to value cash balances held in foreign currency bank accounts, market values of overseas investments and purchases and sales outstanding at the end of the reporting period.

K. CASH AND CASH EQUIVALENTS

Cash comprises cash in hand and deposits with financial institutions which are repayable on demand without penalty.

Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and that are subject to minimal risk of changes in value.

L. FINANCIAL LIABILITIES

The Fund recognises financial liabilities at fair value as at the reporting date. A financial liability is recognised in the net assets statement on the date the Fund becomes party to the liability. From this date any gains or losses arising from changes in the fair value of the liability are recognised by the Fund.

M. ACTUARIAL PRESENT VALUE OF PROMISED RETIREMENT BENEFITS

The actuarial present value of promised retirement benefits is assessed on a triennial basis by the scheme actuary in accordance with the requirements of International Accounting Standard (IAS) 19 and relevant actuarial standards. As permitted under the Code, the fund has opted to disclose the actuarial present value of retirement benefits by way of a note to the Net Assets Statement (Note 19a).

N. ADDITIONAL VOLUNTARY CONTRIBUTIONS (AVC)

AVCs are not included in the accounts in accordance with Regulation 4(1)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 but are disclosed for information in Note 22. There are also some residual policies with Equitable Life, which are disclosed in Note 22, but it is not open for new members.

O. RECHARGES FROM THE GENERAL FUND

The LGPS (Management and Investment of Funds) Regulations 2016 permit the Council to charge administration costs to the Fund. A proportion of the relevant Council costs have been charged to the Fund based on actual time spent on Pension Fund business. Costs incurred in the administration and the oversight and governance of the Fund are set out separately in Note 9.

Note 4 Critical Judgements in Applying Accounting Policies

The accounts contain certain estimated figures that are based on assumptions made by the Council and other bodies about the future or that are otherwise uncertain. Estimates are made because they are required to satisfy relevant standards or regulations and are based on best judgement at the time, derived from historical experience, current trends and other relevant factors. As a result, actual results may differ materially from those assumptions.

The items for which there is a significant risk of material adjustment are:

A. PENSION FUND LIABILITY

The Pension Fund liability is calculated every three years by the appointed actuary with annual updates in the intervening years. The methodology used follows generally agreed guidelines and is in accordance with IAS 19. These assumptions are summarised in the accompanying actuarial report. The estimates of the net liability to pay pensions depends on several judgements and assumptions. In particular, those relating to the discount rate, the rate at which salaries are projected to increase, change in retirement ages, mortality rates and expected returns on the Fund's assets.

The effects on the net pension liability of changes in assumptions can be measured. For instance, a 0.1% increase in the discount rate assumption would result in a decrease in the pension liability of £30m. A 0.1% increase in assumed earnings would increase the value of liabilities by approximately £2m, a 0.1% increase in pension increases would increase the liability by about £28m and a one-year increase in life expectancy would increase the liability by about £62m.

B. PRIVATE EQUITY INVESTMENTS

The fair value of private equity investments is unavoidably subjective. The valuations are based on forward-looking estimates and judgements involving many factors. Unquoted private equity assets are valued by the investment managers in accordance with industry standards. The value of private equity investments at the balance sheet date was £3.5m.

C. PRIVATE DEBT/INFRASTRUCTURE INVESTMENTS

The fair value of the Partners Group Multi Asset Credit fund and Infrastructure fund is also to some extent subjective. Several of the underlying assets are traded in private markets only and therefore judgement needs to be made about value, using factors such as the enterprise value and net debt. As at 31 March 2019, the assets invested with Partners Group were value at £42.3m.

The same applies to the Aviva Infrastructure which is has a quarterly valuation cycle. As at 31 March 2019, the value of the investment was £30.6m.

Note 5 Assumptions Made About the Future and Other Major Sources of Uncertainty

Preparing financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities at the year-end and the amounts reported for income and expenditure during the year. Estimates and assumptions are made taking into account historical experience, current trends and other relevant factors. However, the nature of estimation means that the actual results could differ from the assumptions and estimates.

There have been no material events after the balance sheet date.

Note 6 Events After the Balance Sheet Date

Note 7 Contributions Receivable

Employees' contributions are calculated on a sliding scale based on a percentage of their gross pay. The administering body, scheduled bodies and admitted bodies are required to make contributions determined by the Fund's actuary to maintain the solvency of the fund.

The tables on the right show a breakdown of the total amount of contributions by authority and by type.

BY AUTHORITY

2017/18 £000		2018/19 £000
(24,290)	Administering authority	(25,322)
(3,245)	Scheduled bodies	(3,583)
(3,514)	Admitted bodies	(3,326)
(31,049)	**Total Contributions Receivable**	**(32,231)**

BY TYPE

2017/18 £000		2018/19 £000
(6,781)	Employees' normal contributions	(7,157)
	Employer's contributions:	
(14,861)	Normal contributions	(15,740)
(9,407)	Deficit recovery contributions	(9,334)
(31,049)	**Total Contributions Receivable**	**(32,231)**

Note 8 Benefits Payable

The tables on the right below show a breakdown of the total amount of benefits payable.

BY AUTHORITY

2017/18 £000		2018/19 £000
35,914	Administering authority	37,640
2,427	Scheduled bodies	6,454
380	Admitted bodies	476
38,721	**Total Benefits Payable**	**41,079**

BY TYPE

2017/18 £000		2018/19 £000
31,465	Pensions	32,912
6,360	Commutation and lump sum retirement benefits	7,297
896	Lump sum death benefits	870
38,721	**Total Benefits Payable**	**41,079**

Note 9 Management Expenses

The table on the right shows a breakdown of the management expenses incurred during the year.

MANAGEMENT EXPENSES

2017/18 £000		2018/19 £000
403	Administrative costs	334
3,648	Investment management expenses	5,298
452	Oversight and governance costs	567
4,503	**Total Management Expenses**	**6,199**

The table on the right provides a breakdown of the Investment Management Expenses.

The Fund reported higher management fees in 18/19 due to improved information from fund managers in relation to the fees deducted at source.

INVESTMENT MANAGEMENT EXPENSES

2017/18 £000		2018/19 £000
3,223	Management fees	4,763
343	Performance fees	244
38	Transaction costs	185
44	Custody fees	106

2017/18		2018/19
£000		£000
3,648	**Total Investment Management Expenses**	**5,298**

Note 10 Investment Income

The table below shows a breakdown of investment income.

2017/18 £000		2018/19 £000
(5,331)	Pooled investments – unit trusts and other managed funds	(8,874)
(47)	Income from Bonds	-
(17)	Interest on Cash Deposits	(98)
(4,888)	Private Equity/Other	(2,995)
(10,283)	**Total Investment Income**	**(11,967)**

Note 11 Investment Strategy

During 2018/19, the Fund's strategy had the following developments:

- The Fund invested its full £30m commitment in Aviva Infrastructure in two capital calls. The first was in May 2018 and the last was in November 2018. As at 31 March 2019, the investment was valued at £30.6m.
- In December 2018, the Fund transitioned its entire passive equities portfolio to the MSCI Low Carbon tracker fund under the management of the Legal & General Investment Management team. As at 31 March 2019, this was valued at £374.0m.
- The Fund liquidated its positions in both the Insight Bonds strategy (£85m) and the Majedie Focus and Tortoise strategies which were outside of the London CIV (£35m).
- The proceeds from the sale of the Majedie assets were reinvested into the equity passive strategy.
- On 26 March 2019, the Pensions Sub-Committee agreed to reinvest the proceeds from the Insight sale into the London CIV's Buy & Maintain strategy in Q1 2018/19. In the interim period, the assets have been invested into the LGIM Sterling Liquidity Fund which was valued at £96.0m on 31 March 2019.

The market value and proportion of investments managed by each fund manager at 31 March 2019 was as follows:

31 March 2018 £000	%	Fund Manager	Mandate	31 March 2019 £000	%
Investment managed by the London CIV asset pool:					
-	-	LGIM – MSCI Low Carbon	Global Equity (Passive)	374,028	35.7%
302,920	30.1%	LGIM – World Equity	Global Equity (Passive)	-	-
157,480	15.7%	LCIV – Ruffer	Absolute Return (Active)	126,636	12.1%
125,194	12.5%	LCIV – Majedie	UK Equity (Active)	125,154	11.9%
596,462	**59.3%**	**Total assets managed by the London CIV asset pool**		**625,818**	**59.7%**
Investment managed outside of the London CIV asset pool:					
99,302	9.9%	M&G Investments	Inflation Opportunities	107,834	10.3%
10,868	1.1%	LGIM – Sterling Liquidity Fund	Cash	96,007	9.2%
72,371	7.2%	Oak Hill Advisors	Secured Income (Active)	73,203	7.0%
51,933	5.2%	Aberdeen Standard	Long Lease Property	55,558	5.3%
-	-	Aviva Investors	Infrastructure	30,644	2.9%
41,711	4.2%	Partners Group	Multi Asset Private Credit	25,318	2.4%
7,031	0.8%	Partners Group	Infrastructure	16,987	1.6%

31 March 2018 £000	%	Fund Manager	Mandate	31 March 2019 £000	%
3,757	0.4%	Invesco	Private Equity	2,199	0.2%
1,871	0.2%	Unigestion	Private Equity	1,293	0.1%
88,885	8.8%	Insight	Global Bonds (Active)	-	-
33,946	3.4%	Majedie	UK Equity (Active)	-	-
7,075	0.6%	Inhouse Cash	Cash	12,867	1.3%
150	0.0%	London CIV Ltd	UK Equity	150	0.0%
408,032	40.6%	Total assets managed outside of the London CIV asset pool		422,060	40.3%
1,004,494	**100.0%**	**Total investments**		**1,047,878**	**100.0%**

Note 11 Investment Strategy (continued)

As part of the Fund's ongoing investment strategy, there remains an outstanding commitment which was made to the Partners Group Direct Infrastructure fund in August 2015. As at 31 March 2019 €33.8m still remained unfunded.

The private equity investments made some years ago are now in the redistribution phase of the cycle, which will be completed in late 2019. As at 31 March 2019, £3.5m remained to be redistributed back into the Fund.

As shareholders of London LGPS CIV Ltd, (the organisation set up to run pooled LGPS investments in London), the Fund has funded £150,000 of regulatory capital. This is in the form of unlisted UK equity shares. The Council has been active in the transfer of assets under management to the London Collective Investment Vehicle (CIV) to gain efficiencies and fee reductions. As at 31 March 2019, the Fund had £721.8m invested with the London CIV, which accounts for 68.9% of the fund's total assets.

The table below shows the Fund investments which exceed 5% of net assets. These are all pooled investment vehicles, which are made up of underlying investments, each of which represent substantially less than 5%.

31 March 2018 £000	%	Fund Manager	Mandate	31 March 2019 £000	%
-	-	LGIM – MSCI Low Carbon	Global Equity (Passive)	374,028	35.7%
302,920	30.1%	LGIM – World Equity	Global Equity (Passive)	-	-
157,480	15.7%	LCIV – Ruffer	Absolute Return (Active)	126,636	12.1%
125,194	12.5%	LCIV – Majedie	UK Equity (Active)	125,154	11.9%
99,302	9.9%	M&G Investments	Inflation Opportunities	107,834	10.3%

31 March 2018 £000	%	Fund Manager	Mandate	31 March 2019 £000	%
10,868	1.1%	LGIM – Sterling Liquidity Fund	Cash	96,007	9.2%
72,371	7.2%	Oak Hill Advisors	Secured Income (Active)	73,203	7.0%
51,933	5.2%	Aberdeen Standard	Long Lease Property	55,558	5.3%
88,885	8.8%	Insight	Global Bonds (Active)	-	-

Note 12 Reconciliation of Movement in Investments

The table below shows a reconciliation of the movement in the total investment assets of the Fund by asset class during 2018/19.

Fund Manager	Value at 1 April 2018 £000	Purchases during the year and derivative payments £000	Sales during the year and derivative receipts £000	Change in market value during the year £000	Value at 31 March 2019 £000
Equities	150	-	(10)	10	150
Pooled equity Investments	890,947	836,089	(867,391)	43,206	90,851
Pooled property investments	51,933	33	-	3,592	55,558
Private equity/infrastructure	55,261	38,866	(20,023)	2,338	76,442
Total	**998,291**	**874,988**	**(887,424)**	**49,146**	**1,035,001**
Cash deposits	6,168	-		22	12,843
Investment income due	35	-		-	34
Spot FX contracts	-	-		(26)	-
Net investment assets	**1,004,494**	**874,988**	**(887,424)**	**49,142**	**1,047,878**

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Note 12 Reconciliation of Movement in Investments (continued)

The equivalent analysis for 2017/18 is provided below:

Fund Manager	Value at 1 April 2017 £000	Purchases during the year and derivative payments £000	Sales during the year and derivative receipts £000	Change in market value during the year £000	Value at 31 March 2018 £000
Equities	112,475	6,485	(120,878)	1,918	-
Pooled equity Investments	765,856	197,904	(74,163)	1,500	891,097
Pooled property investments	47,037	-	(248)	5,144	51,933
Private equity/infrastructure	68,973	5,614	(20,065)	739	55,261
Derivatives:					
Forward foreign exchange	(1)	1	-	-	-
Total	**994,340**	**210,004**	**(215,354)**	**9,301**	**998,291**
Cash deposits	7,856			1,065	6,168
Amounts receivable from sales of investments	76			-	-
Investment income due	521			-	35

Fund Manager	Value at 1 April 2017 £000	Purchases during the year and derivative payments £000	Sales during the year and derivative receipts £000	Change in market value during the year £000	Value at 31 March 2018 £000
Spot FX contracts	-			18	-
Amounts payable for purchases of investments	(111)			-	-
Net investment assets	**1,002,682**	**210,004**	**(215,354)**	**10,384**	**1,004,494**

Note 13 Fair Value Basis of Valuation

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Pooled Investments – Equity Funds UK and Overseas Managed Funds	Level 2	The NAV for each share class is calculated based on the market value of the underlying equity assets	Evaluated price feeds	Not required
Unquoted Bonds and Unit Trusts	Level 2	Fixed income securities are priced based on evaluated prices provided by independent pricing services	Evaluated price feeds	Not required
Pooled Long Lease Property Fund	Level 2	The Standard Life Long Lease Property Fund is priced on a Single Swinging Price	In house evaluation of market data	Not required
Private Equity	Level 3	Comparable valuation of similar companies in accordance with International Private and Venture Capital Valuation Guidelines 2012	Earnings before interest, tax, depreciation and amortisation (EBITDA) multiple Revenue multiple	Valuations could be affected by changes to expected cashflows, cost of replacing key business assets, or by any differences between the audited and unaudited accounts
Infrastructure funds	Level 3	Valued by Fund Managers at the lower of cost and fair value	Managers use their judgement having regard to the Equity and Venture Capital Valuation Guidelines 2012 guidelines noted above	Upward valuations are only considered where there is validation of the investment objectives and such progress can be demonstrated Downward valuations are enacted where the manager considers there is an impairment to the underlying investment

Note 14a Valuation of Financial Instruments Carried at Fair Value

The valuation of financial instruments has been classified into three levels, according to the quality and reliability of information used to determine fair values. The definitions of the levels are detailed below.

LEVEL 1

Fair values are derived from unadjusted quoted prices in active markets for identical assets or liabilities. Examples are quoted equities, quoted index linked securities and unit trusts. All level 1 investments are shown at bid prices. The bid value of the investment is based on the bid market quotation of the relevant stock exchange.

LEVEL 2

Quoted prices are not available for financial instruments at this level. The valuation techniques used to determine fair value use inputs that are based significantly on observable market data.

LEVEL 3

Financial instruments at Level 3 are those where at least one input that could have a significant effect on the instrument's valuation is not based on observable market data e.g. private equity investments.

The values of the private equity investments are based on valuations provided by the General Partners to the private equity funds. The Partners Group multi asset credit and the infrastructure funds are closed ended and therefore not tradable. The valuation is based on market prices where available for some underlying assets and on estimates of prices in secondary markets for others.

Quoted Market Price Level 1 £000	Using Observable Inputs Level 2 £000	31 March 2018 With Significant Unobservable Inputs Level3 £000		Quoted Market Price Level 1 £000	Using Observable Inputs Level 2 £000	31 March 2019 With Significant Unobservable Inputs Level3 £000
			Financial Assets			
33,940	908,939	55,412	Designated at fair value through profit and loss	-	958,409	76,592
33,940	908,939	55,412	Net Financial Assets	-	958,409	76,592
		998,291				**1,035,001**

Note 14b Transfers Between Levels 1 and 2

In 2018/19, the Fund's operational activity resulted in the following transfers between Levels 1 and 2 determination:

- The Fund sold the remaining £35m of Majedie assets (Level 1) which were managed outside of the London CIV. The total amount was reinvested into the equity passive strategy.
- After the Fund divested its assets from the Insight Bond Plus strategy (Level 2), these were reinvested temporarily into the Sterling Liquidity fund (Level 1). These funds are expected to be invested into the London CIV's Buy and Maintain strategy in Q1 2018/19.

	Market Value as at 31 March 2019 £000	Purchases £000	Sales £000	
UK Infrastructure	-	30,000	-	644
Total	**55,411**	**38,866**	**(20,023)**	**(201)**

Note 14c Reconciliation of Fair Value Measurements Within Level 3

	Market Value as at 31 March 2019 £000	Purchases £000	Sales £000	Unrealised Gains/(losses) £000	Realised Gains/(losses) £000	Market Value as at 31 March 2019 £000
Overseas infrastructure	13,551	8,866	(3,536)	(940)	2,539	20,480
Private Credit	41,710	-	(16,487)	95	-	25,318
London LGPS CIV	150	-	-	-	-	150

Designated at fair value through profit & loss £000	Financial assets at amortised cost £000	31 March 2018 Financial liabilities at amortised cost £000		
			Pooled Investment Vehicles:	
791,194			UK equity funds	80

Note 15a Classification of Financial Instruments

The following table analyses the carrying amounts of financial assets and liabilities split by UK and Overseas, by category and net assets statement heading as at the balance sheet date. All investments are quoted unless stated.

Designate d at fair value through profit & loss £000	Financial assets at amortised cost £000	31 March 2018 Financial liabilities at amortised cost £000		Designate d at fair value through profit & loss £000	Financial assets at amortised cost £000	31 March 2019 Financial liabilities at amortised cost £000
			Financial Assets			

10,867			UK cash funds	96
51,933			UK property funds	55
88,885			Overseas fixed income funds	-
150			London LGPS CIV	15
41,711			UK venture capital	72
13,551			Overseas venture capital	3,
35			Investment Income Due	35

Designated at fair value through profit & loss £000	Financial assets at amortised cost £000	31 March 2018 Financial liabilities at amortised cost £000		Designated at fair value through profit & loss £000	Financial assets at amortised cost £000	31 March 2019 Financial liabilities at amortised cost £000
	6,168		Cash deposits with managers		12,843	
	2,059		Debtors		2,679	
	4,361		Cash balances (held by fund)		2,673	
998,326	12,588		Total Financial Assets	1,035,036	18,195	-
			Financial Liabilities			
		(620)	Creditors	-		(1,185)
		(620)	Total Financial Liabilities	-	-	(1,185)
1,010,294			Total Net Assets			**1,052,046**

Note 15b Net Gains a

This table summarises the net gains and losses on financial instruments classified by type of instrument.

31 March 2018	
	Financial Assets

31 March 2018		
10,235	Fair value through profit and loss	49,146
149	Loans and receivables	23
	Financial Liabilities	
-	Fair value through profit and loss	(27)
10,384	**Net Gains /(losses) on Financial Instruments**	**49,142**

Note 16 Nature and Extent of Risks Arising from Financial Instruments

The Fund's primary long-term risk is that the Fund's assets will fall short of its liabilities. The Fund's liabilities are sensitive to inflation through pension and pay increases, interest rates and mortality rates. The assets that would most closely match the liabilities are a combination of index-linked gilts, as the liabilities move in accordance with changes in the relevant gilt yields and changes in inflation.

The Pensions sub-committee maintains a Pension Fund risk register and reviews the risks and appropriate mitigating actions at every meeting.

A. MARKET RISK

In order to meet the Fund's objective of being fully funded within 22 years of the 2016 actuarial valuation, the fund managers have been set differing targets appropriate to the types of assets they manage. The Fund's assets are invested in a broad range of asset classes in terms of geographical and industry sectors and individual securities which are expected to produce returns above their benchmarks over the long term, albeit with greater volatility. This diversification reduces exposure to market risk (price risk, currency risk and interest rate risk) and credit risk to an acceptable level.

The aim of the investment strategy is to maximise the opportunity for gains across the whole Fund's portfolio within a tolerable level of risk of an overall reduction in the value of the Fund. Responsibility for the Fund's investment strategy rests with the Pensions sub-committee and is reviewed on a regular basis.

B. PRICE RISK

Price risk represents the risk that the value of a financial instrument will fluctuate as a result of changes in market prices (other than those arising from interest rate risk or foreign exchange risk), whether those changes are caused by factors specific to the individual instrument or its issuer, or factors affecting all such instruments in the market.

The Fund is exposed to price risk. This arises from investments held by the Fund for which the future price is uncertain. All securities represent a risk of loss of capital. The maximum risk resulting from financial instruments (with the exception of the derivatives where the risk is currency related) is determined by the fair value of the financial instruments. The Fund's investment managers aim to mitigate this price risk through diversification and the selection of securities and other financial instruments.

All assets except for cash, forward foreign exchange contracts, other investment balances, debtors and creditors are exposed to price risk. The table below shows the value of these assets at the balance sheet date (and the prior year) and what the value would have been if prices had been 10% higher or 10% lower.

Assets exposed to price risk	Value £000	+10% £000	-10% £000
At 31 March 2018	998,291	1,098,120	898,462
At 31 March 2019	**1,035,001**	**1,138,501**	**931,501**

C. INTEREST RATE RISK

The Fund invests in financial assets for the primary purpose of obtaining a return on its investments. Fixed Interest securities and cash are subject to interest rate risks, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Fund recognises that interest rates can vary and can affect both income to the Fund and the value of the net assets available to pay benefits.

Index linked gilts, cash and some elements of the pooled investment vehicles are exposed to interest rate risk. The table below shows the value of these assets at the balance sheet date (and the prior year) and what the value would have been if interest rates had been 1% higher or 1% lower.

Assets exposed to interest rate risk	Value £000	+1% £000	-1% £000
At 31 March 2018	220,753	222,779	218,367
At 31 March 2019	**225,147**	**226,318**	**230,307**

Assets exposed to currency risk	Value £000	+10% £000	-10% £000
At 31 March 2018	418,816	460,698	376,934
At 31 March 2019	**418,816**	**460,698**	**376,934**

Note 16 Nature amd Extent of Risks Arising from Financial Instruments (continued)

D. CURRENCY RISK

Currency risk represents the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The Fund is exposed to currency risk on financial instruments that are denominated in any currency other than pounds sterling.

The Fund recognises that a strengthening/weakening of the pound against the various currencies in which the Fund holds investments would increase/decrease the net assets available to pay benefits.

In order to mitigate the risk, one of the Fund's investment managers enters into forward foreign exchange contracts (accounted for as derivatives) to hedge the currency risk which arises from undertaking non-sterling transactions. In addition, several of the pooled investment vehicles partially or fully hedge the currency back into sterling. These actions reduce the overall currency risk the Fund is exposed to

E. CREDIT RISK

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the Fund's financial assets and liabilities.

In essence, the Fund's entire investment portfolio is exposed to some form of credit risk. However, the selection of high-quality fund managers, counterparties, brokers and financial institutions minimises credit risk that may occur through the failure to settle a transaction in a timely manner.

F. LIQUIDITY RISK

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Fund therefore takes steps to ensure that there are adequate cash resources to meet its commitments. This will particularly be the case for cash to meet the pensioner payroll costs; and cash to meet investment commitments. The Fund has immediate access to its cash holdings.

The only assets in the Fund which cannot be liquidated within a month are detailed in the table below. These amounted to 9.67% of the Fund's Net Assets at 31 March 2019 (10.20% at 31 March 2018). The remaining can all be liquidated within days.

Manager	Portfolio	31 March 2018	31 March 2019

Manager	Portfolio	31 March 2018	31 March 2019
Partners Group	Multi asset credit	41,711	25,319
Partners Group	Infrastructure	7,924	16,987
Aberdeen Standard	Property	51,933	55,558
Invesco	Private Equity	3,757	2,199
Unigestion	Private Equity	1,871	1,293
	Total	**107,196**	**101,356**

Note 17 Contingent Liabilities and Contractual Commitments

The Fund had the following commitments at the balance sheet date:

	31 March 2018 £000	31 March 2019 £000
Aviva Infrastructure Fund	30,000	-
Partners Group Direct Infrastructure Fund 2015	40,198	31,135
	70,198	**31,135**

Note 18 Stock Lending Arrangements

The Fund did not participate in stock lending or underwriting.

Note 18 Funding Arrangements

The latest full triennial valuation of the London Borough of Hammersmith and Fulham Pension Fund was carried out by Barnett Waddingham, the Fund's actuary, as at 31 March 2016 in accordance with the Funding Strategy Statement of the Fund and the Local Government Pension Scheme Regulations 2013. The results were published in the triennial valuation report dated 30 March 2017. This valuation set the employer contribution rates from 1 April 2017.

The latest full triennial valuation of the London Borough of Hammersmith and Fulham Pension Fund was carried out by Barnett Waddingham, the Fund's actuary, as at 31 March 2016 in accordance with the Funding Strategy Statement of the Fund and the Local Government Pension Scheme Regulations 2013. The results were published in the triennial valuation report dated 30 March 2017. This valuation set the employer contribution rates from 1 April 2017.

The 2016 valuation certified a common contribution rate of 15.5% of pensionable pay (13.6% as at March 2013) to be paid by each employing body participating in the Fund, based on a funding level of 88% (83% as at March 2013). In addition, each employing body must pay an individual adjustment to reflect its own particular circumstances and funding position within the Fund. Details of each employer's contribution rate are contained in the Statement to the Rates and Adjustment Certificate in the triennial valuation report.

The actuary's smoothed market value of the scheme's assets at 31 March 2016 was £851m and the actuary assessed the present value of the funded obligation at £965m indicating a net liability of £114m (£147m 2013).

The actuarial valuation, carried out using the projected unit method, is based on economic and statistical assumptions, the main ones being:

- The rate of accumulation of income and capital on new investments over the long-term and the increase from time to time of income from existing investments.
- Future rises in pensionable pay due to inflation and pension increases.
- Withdrawals from membership due to mortality, ill health and ordinary retirement.
- Progression of pensionable pay due to promotion.

The contribution rate is set on the basis of the cost of future benefit accrual, increased to bring the funding level back to 100% over a period of 22 years, as set out in the Funding Strategy Statement. It is set to be sufficient to meet the additional annual accrual of benefits allowing for future pay increases and increases to pension payments when these fall due, plus an amount to reflect each participating employer's notional share of value of the Fund's assets compared with 100% of their liabilities in the Fund in respect of service to the valuation date.

The next actuarial valuation of the Fund will be as at 31 March 2019 and will be published in 2020.

Note 19a Actuarial Present Value of Promised Retirement Benefits

The table below shows the total net liability of the Fund as at 31 March 2019. The figures have been prepared by Barnett Waddingham, the Fund's actuary, only for the purposes of providing the information required by IAS26. In particular, they are not relevant for calculations undertaken for funding purposes or for other statutory purposes under UK pensions legislation.

In calculating the required numbers, the actuary adopted methods and assumptions that are consistent with IAS19.

31 March 2018 £000		31 March 2019 £000
(1,630,601)	Present value of promised retirement benefits	(1,651,279)
1,009,620	Fair value of scheme assets (bid value)	1,052,073
(620,981)	**Net Liability**	**(599,206)**

Present Value of Promised Retirement Benefits comprises of £1,617.1m (£1,592.5m at 31 March 2018) and £34.1m (£37.3m at 31 March 2018) in respect of vested benefits and non-vested benefits respectively as at 31 March 2019.

The assumptions applied by the actuary are set out below:

FINANCIAL ASSUMPTIONS

	31 March 2018	31 March 2019
RPI increases	3.3%	3.4%
CPI increases	2.3%	2.4%
Salary increases	3.8%	3.9%
Pension increases	2.3%	2.4%
Discount rate	2.6%	2.4%

DEMOGRAPHIC ASSUMPTIONS

The post mortality tables adopted are the S2PA tables. The base tables are projected using the CMI 2012 Model, allowing for a long-term rate of improvement of 1.5% p.a. The assumed life expectancies from age 65 are:

		31 March 2018	31 March 2019
Retiring today	Males	24.5	23.4
	Females	26.1	24.8
Retiring in 20 years	Males	26.8	25.0
	Females	28.4	26.6

OTHER ASSUMPTIONS

- Members will exchange half of their commutable pension for cash at retirement;
- Members will retire at one retirement age for all tranches of benefit, which will be the pension weighted average tranche retirement age;
- 5% of active members will take up the option under the new LGPS to pay 50% of contributions for 50% of benefits.

Note 20 Current Assets

DEBTORS

31 March 2018 £000		31 March 2019 £000
736	Contributions due – employers	1,030
197	Contributions due – employees	453
228	London Borough of Hammersmith & Fulham	941
898	Sundry Debtors	229
2,059	**Total Current Assets**	**2,723**

ANALYSIS OF DEBTORS

31 March 2018 £000		31 March 2019 £000
228	Local authorities	941
1,831	Other entities and individuals	1,782
2,059	**Total Current Assets**	**2,723**

Note 21 Current Liabilities

CREDITORS

31 March 2018 £000		31 March 2019 £000
(75)	Unpaid benefits	(527)
(369)	Management expenses	(461)
(672)	HM Revenue and Customs	-
(175)	Sundry creditors	(212)
(1,291)	**Total Current Liabilities**	**(1,201)**

ANALYSIS OF DEBTORS

31 March 2018 £000		31 March 2019 £000
(158)	Local authorities	-
(672)	Central government bodies	-
(461)	Other entities and individuals	(1,201)
(1,291)	**Total Current Liabilities**	**(1,201)**

Note 22 Additional Voluntary Contributions (AVCS)

The Fund's AVC providers are Zurich Assurance and the Equitable Life Assurance Society. The table below shows information about these separately invested AVCs.

31 March 2018 £000		31 March 2019 £000
824	Zurich Assurance	908
203	Equitable Life Assurance	203
1,027	**Total Additional Voluntary contributions**	**1,111**

In accordance with Regulation 4(1)(b) of the Pension Scheme (Management and Investment of Funds) Regulations 2009 the contributions paid, and the investments are not included in the Pension Fund Accounts.

The AVC providers secure benefits on a money purchase basis for those members electing to pay AVCs. Members of the AVC schemes each receive an annual statement confirming the amounts held in their account and the movements in the year. The Fund relies on individual contributors to check that deductions are accurately reflected in the statements provided by the AVC provider.

Note 23 Related Party Transactions

LONDON BOROUGH OF HAMMERSMITH AND FULHAM

The Pension Fund is administered by the London Borough of Hammersmith and Fulham. The Council incurred costs of £0.334m in 2018/19 (£0.285m in 2017/18) in relation to the administration of the Fund and were reimbursed by the Fund for the expenses.

GOVERNANCE ARRANGEMENTS

One member of the Pensions sub-committee is a deferred member of the Hammersmith and Fulham Pension Fund. Members of the sub-committee are required to make a declaration of interests at the beginning of each meeting.

KEY MANAGEMENT PERSONNEL

The key management personnel of the Fund are the Members of the Pensions Sub-Committee, the Strategic Director of Finance and Resources, the Tri-borough Director of Pensions and Treasury and the Director of Corporate Services. Total remuneration payable to key management personnel in respect of the pension fund is set out below:

	31 March 2018	31 March 2019
Short-term benefits	29	26
Post-employment benefits	42	(3)
Total	**71**	**23**

Note 24 Agency Services

The Hammersmith and Fulham Pension Fund pays discretionary awards to the former employees of London Borough of Hammersmith and Fulham Council. The amounts paid are not included within the Fund Account but are provided as a service and fully reclaimed from the Council. In 2018/19 the pension fund paid discretionary awards of £2.300m (£2.342m in 2017/18).

31 March 2018 £000		31 March 2019 £000
2,342	Payments on behalf of London Borough of Hammersmith and Fulham	2,300
2,342	**Total**	**2,300**

Note 25 External Audit Costs

The external audit fee payable to Fund's external auditors, Grant Thornton LLP, was £16,170 (£21,000 in 2017/18).

7.

Glossary and Contacts

Glossary of Terms

ACCOUNTING POLICIES

The rules and practices adopted by the authority that determine how the transactions and events are reflected in the accounts.

ACCRUALS

Amounts included in the accounts for income or expenditure in relation to the financial year but not received or paid as at 31 March.

ACTIVE MANAGEMENT

Active management or active fund management is where the fund manager makes specific investments with the aim of outperforming an investment benchmark.

ACTIVE MEMBER

Current employee who is contributing to a pension scheme.

ACTUARIAL GAINS AND LOSSES

These arise where actual events have not coincided with the actuarial assumptions made for the last valuations (known as experience gains and losses) or the actuarial assumptions have been changed.

ACTUARY

An independent professional who advises the Council on the financial position of the Fund. Every three years the actuary values the assets and liabilities of the Fund and determines the funding level and the employers' contribution rates.

ADDITIONAL VOLUNTARY CONTRIBUTIONS (AVC)

An option available to active scheme members to secure additional pension benefits by making regular contributions to separately held investment funds managed by the Fund's AVC provider.

ADMITTED BODY

An organisation, whose staff can become members of the Fund by virtue of an admission agreement made between the Council and the organisation. It enables contractors who take on the Council's services with employees transferring, to offer those staff continued membership of the Fund.

ASSET ALLOCATION

The apportionment of a Fund's assets between different types of investments (or asset classes). The long-term strategic asset allocation of a Fund will reflect the Fund's investment objectives.

BENCHMARK

A measure against which the investment policy or performance of an investment manager can be compared.

BONDS

Investments, mainly in government stocks, which guarantee a fixed rate of interest. The securities represent loans which are repayable at a future date but which can be traded on a recognised stock exchange in the meantime.

CIPFA (CHARTERED INSTITUTE OF PUBLIC FINANCE AND ACCOUNTING)

CIPFA is the professional institute for accountants working in the public services. CIPFA publishes the Code.

CREDITORS

Amounts owed by the Council for goods and services received but not paid for as at 31 March.

DEBTORS

Amounts owed to the Council for goods and services provided but where the associated income was not received as at 31 March.

DEFERRED MEMBERS

Scheme members, who have left employment or ceased to be active members of the scheme whilst remaining in employment but retain an entitlement to a pension from the scheme.

DEFINED BENEFIT SCHEME

A type of pension scheme, where the pension that will ultimately be paid to the employee is fixed in advance, and not impacted by investment returns. It is the responsibility of the sponsoring organisation to ensure that sufficient assets are set aside to meet the pension promised.

DERIVATIVE

A derivative is a financial instrument which derives its value from the change in price (e.g. foreign exchange rate, commodity price or interest rate) of an underlying investment (e.g. equities, bonds, commodities, interest rates, exchange rates and stock market indices), which no net initial investment or minimal initial investment and is settled at a future date

EMPLOYER CONTRIBUTION RATES

The percentage of the salary of employees that employers pay as a contribution towards the employees' pension.

EQUITIES

Ordinary shares in UK and overseas companies traded on a stock exchange. Shareholders have an interest in the profits of the company and are entitled to vote at shareholders' meetings.

EXCHANGE TRADED

This describes a financial contract which is traded on a recognised exchange such as the London Stock Exchange or the London International Financial Futures Exchange.

FINANCIAL ASSETS

Financial assets are cash, equity instruments within another entity (e.g. shares) or a contractual right to receive cash or another asset from another entity (e.g. debtors) or exchange financial assets or financial liabilities under potentially favourable conditions (e.g. derivatives).

FINANCIAL INSTRUMENT

Any contract giving rise to a financial asset in one entity and a financial liability or equity in another entity.

FINANCIAL LIABILITIES

Financial assets are contractual obligations to deliver cash or another financial asset (e.g. creditors) or exchange financial assets or financial liabilities under potentially unfavourable conditions (e.g. derivatives).

FORWARD FOREIGN EXCHANGE DERIVATIVE

Forward foreign exchange derivatives are over the counter contracts whereby two parties agree to exchange two currencies on a specified future date at an agreed rate of exchange.

INDEX

A calculation of the average price of shares, bonds, or other assets in a specified market to provide an indication of the average performance and general trends in the market.

OVER THE COUNTER

This describes a financial contract which is potentially unique as they are not usually traded on a recognised exchange

PASSIVE MANAGEMENT

Passive management is where the investments mirror a market index.

POOLED INVESTMENT VEHICLES

Funds which manage the investments of more than one investor on a collective basis. Each investor is allocated units which are revalued at regular intervals. Income from these investments is normally returned to the pooled fund and increases the value of the units.

PROJECTED UNIT METHOD – PENSION FUND VALUATION

An accrued benefits valuation method in which the scheme liabilities make allowance for projected earnings. An accrued benefits valuation method is a valuation method in which the scheme liabilities at the valuation date relate to:

- the benefits for pensioners and deferred pensioners (i.e. individuals who have ceased to be active members but are entitled to benefits payable at a later date) and their dependents, allowing where appropriate for future increases, and
- the accrued benefits for members in service on the valuation date.

RELATED PARTIES

Two or more parties are related parties when at any time during the financial period:

- one party has direct or indirect control of the other party; or
- the parties are subject to common control from the same source; or
- one party has influence over the financial and operational policies of the other party, to an extent that the other party might be inhibited from pursuing at all times its own separate interests; or
- the parties, in entering a transaction, are subject to influence from the same source, to such an extent that one of the parties to the transaction has subordinated its own separate interests.

Advice from CIPFA is that related parties to a local authority include Central Government, bodies precepting or levying demands on the Council Tax, members and chief officers of the authority and its pension fund.

RELATED PARTY TRANSACTION

A related party transaction is the transfer of assets or liabilities or the performance of services by, to or for a related party, irrespective of whether a charge is made. Examples of related party transactions include:

- the purchase, sale, lease, rental or hire of assets between related parties;
- the provision by a pension fund to a related party of assets of loans, irrespective of any direct economic benefit to the pension fund;
- the provision of services to a related party, including the provision of pension fund administration services; and
- transactions with individuals who are related parties of an authority or a pension fund, except those applicable to other members of the community or the pension fund, such as Council Tax, rents and payments of benefits.

RETURN

The total gain from holding an investment over a given period, including income and increase or decrease in market value.

SCHEDULED BODY

An organisation that has the right to become a member the Local Government Pension Scheme under the scheme regulations. Such an organisation does not need to be admitted, as its right to membership is automatic.

THE CODE

The Code incorporates guidance in line with IFRS, IPSAS and UK GAAP Accounting Standards. It sets out the proper accounting practice to be adopted for the Statement of Accounts to ensure they 'present fairly' the financial position of the Council. The Code has statutory status via the provision of the Local Government Act 2003.

UNREALISED GAINS/LOSSES

The increase or decrease in the market value of investments held by the fund since the date of their purchase.

NOTE: values throughout these accounts are presented rounded to whole numbers. Totals in supporting tables and notes may not appear to cast, cross-cast, or exactly match to the core statements or other tables due to rounding differences.

Contact Information

FOR FURTHER DETAILS CONTACT:

FINANCE ENQUIRIES

Tri-Borough Pensions Team
16th Floor
64 Victoria Street
London
SW1E 6QP
pensionfund@lbhf.gov.uk

HR ENQUIRIES

Bi-Borough Pensions Manager
Royal Borough of Kensington and Chelsea
The Town Hall
Hornton Street
London
W8 7NX
pensions@rbkc.gov.uk

ADMINISTRATIVE ENQUIRIES

Pension Services
Surrey County Council
Room 243 County Hall
Penrhyn Road
Kingston upon Thames
Surrey, KT1 2DN

8. Appendices

Appendix 1. Governance Compliance Statement

BACKGROUND

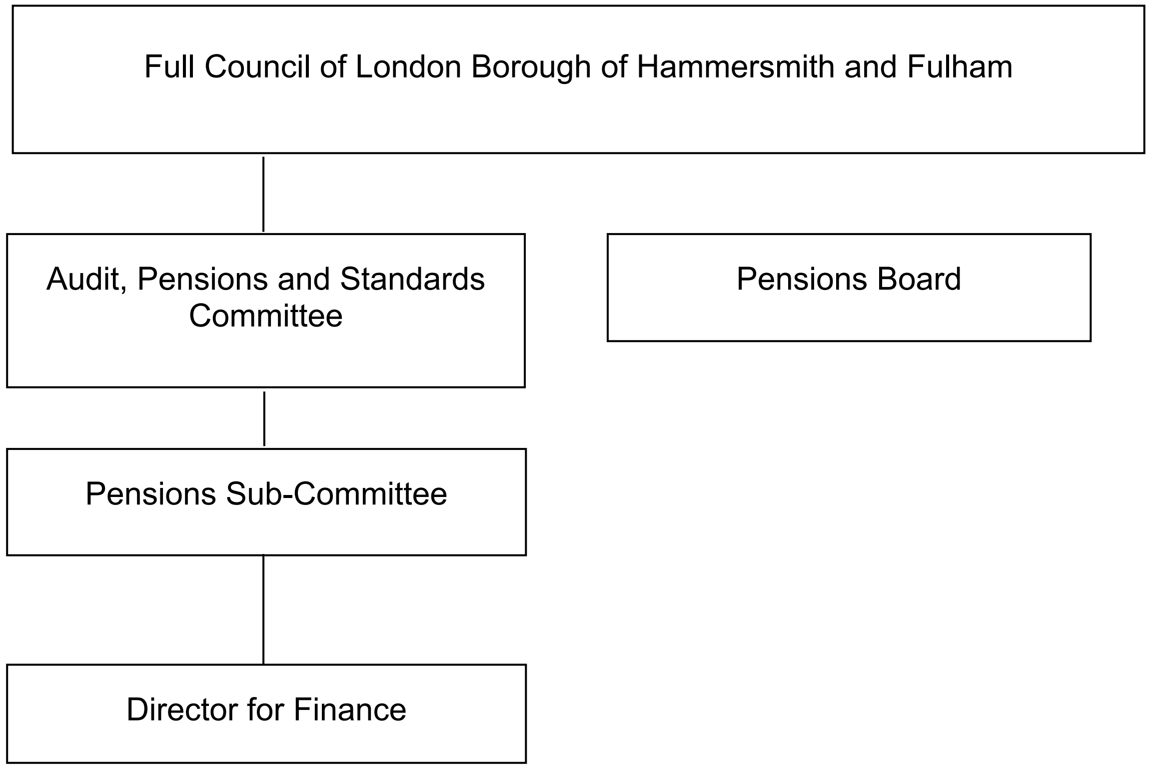
The London Borough of Hammersmith and Fulham is the administering authority for the London Borough of Hammersmith and Fulham ("the Fund") and it administers the Local Government Pension Scheme on behalf of the participating employers.

Regulation 55 of the Local Government Pension Scheme Regulations 2013 requires all administering authorities for local government pension schemes to publish a Governance Compliance Statement setting out the Fund's governance arrangements. Information on the extent of the Fund's compliance with guidance issued by the Secretary of State for Communities and Local Government is also a requirement of this regulation.

GOVERNANCE STRUCTURE

The diagram on the right shows the governance structure in place for the Fund.

Full Council has delegated its functions in relation to the Pension Fund regulations, as shown in the diagram. The sections below explain the role of each party and provide the terms of reference.



AUDIT, PENSIONS AND STANDARDS COMMITTEE

Full Council has delegated all decisions in relation to the Public Service Pensions Act 2013 to the Audit, Pensions and Standards Sub-Committee. In order to manage the workload of the committee, the committee has delegated decisions in relation to all pensions' matters to the Pensions Sub-committee.

PENSIONS SUB-COMMITTEE

The role of the Pensions Sub- Committee is to have responsibility for all aspects of the investment and other management activity of the Fund.

The sub-committee is made up of four elected members of the Audit, Pensions and Standards Committee and one co-opted member. Three members of the committee are administration councillors and one member represents the opposition. The sub-committee is chaired by the Chair of the Audit, Pensions and Standards Committee. The Sub Committee may co-opt non-voting independent members, including Trade Unions and representatives from the admitted and scheduled bodies in the Pension Fund.

All Councillors on the sub-committee have voting rights. In the event of an equality of votes, the Chair of the Sub-committee shall have a second casting vote. Where the Chair is not in attendance, the Vice-Chair has the casting vote.

The Sub-committee meets four times a year and may convene additional meetings as required. Three members of the Sub-committee are required to attend for a meeting to be quorate.

The terms of reference for the sub-committee are:

1. To agree the investment strategy and strategic asset allocation having regard to the advice of the fund managers and the Investment Consultant.
2. To monitor performance of the Pension Fund, individual fund managers, custodians, actuary and other external advisors to ensure that they remain suitable;
3. To determine the Fund management arrangements, including the appointment and termination of the appointment of the Fund Managers, Actuary, Custodians and Fund Advisers.
4. To agree the Statement of Investment Principles, the Funding Strategy Statement, the Business Plan for the Fund, the Governance Policy Statement, the Communications Policy Statement and the Governance Compliance Statement and to ensure compliance with these.
5. To approve the final statement of accounts of the Pension Fund and to approve the Annual Report.
6. To receive actuarial valuations of the Superannuation Fund regarding the level of employers' contributions necessary to balance the Superannuation Fund.

7. To oversee and approve any changes to the administrative arrangements, material contracts and policies and procedures of the Council for the payment of pensions, and allowances to beneficiaries.

8. To make and review an admission policy relating to admission agreements generally with any admission body.

9. To ensure compliance with all relevant statutes, regulations and best practice with both the public and private sectors.

10. To review the arrangements and managers for the provision of Additional Voluntary Contributions for fund members.

11. To receive and consider the Auditor's report on the governance of the Pension Fund.

12. To determine any other investment or pension fund policies that may be required from time to time so as to comply with Government regulations and to make any decisions in accordance with those policies.

PENSION BOARD

With effect from 1st April 2015, all administering authorities are required by the Public Services Pensions Act 2013 to establish a Pension Board to assist them. The London Borough of Hammersmith and Fulham Pension Board was established by full Council on 25th February 2015.

The role of the Pension Board is to assist the administering authority with securing compliance with Local Government Pension Scheme regulations and other legislation relating to the governance and administration of the scheme. The Board does not have a decision making role in relation to management of the Fund, but is able to make recommendations to the Pension Fund Committee.

The membership of the Board is as follows:

- Three employer representatives comprising one from an admitted or scheduled body and two nominated by the Council;
- Three scheme member's representatives from the Council or an admitted or scheduled body.

All Board members are entitled to vote, but it is expected that as far as possible Board members will reach a consensus. Three Board members are required to attend for a meeting to be quorate. The Board will meet a minimum of twice a year but is likely to meet on a quarterly basis to reflect the same frequency as the Pension Fund Committee.

COMPLIANCE WITH STATUTORY GUIDANCE

It is a regulatory requirement that the Fund publishes the extent to which it complies with statutory guidance issued by the Secretary of State for Communities and Local Government. The guidance and compliance levels are set out in Annex 1.

REVIEW OF STATEMENT

This statement will be kept under review and updated as required. Consultation with the admitted and scheduled bodies of the Fund will take place before the statement is finalised at each change.

Governance Compliance Statement (continued)

Compliance Requirement	Compliance	Notes
Structure		
The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Compliant	As set out in terms of reference of the Pensions Sub-Committee.
That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Not fully compliant	Representatives of the employers and scheme members are Pension Board members, rather than members of the Pensions Sub-Committee.
That where a secondary committee or panel has been established, the structure ensures effective communication across both levels	Not applicable	All Pension Fund matters are considered by the Pensions Sub-Committee
That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel	Not applicable	All Pension Fund matters are considered by the Pensions Sub-Committee
Committee membership and representation		
That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include: - i) employing authorities (including non-scheme employers, e.g. admitted bodies); ii) scheme members (including deferred and pensioner scheme members), iii) where appropriate, independent professional observers, and iv) expert advisors (on an *ad hoc* basis).	Not fully compliant	Representatives of the employers and scheme members are Pension Board members, rather than members of the Pensions Sub-Committee. Expert advisers attend the Sub-Committee as required
That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights	Not applicable	All Pension Fund matters are considered by the Pensions Sub-Committee
Selection and role		
That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee	Compliant	As set out in terms of reference of the Pensions Sub-Committee
That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda	Compliant	This is a standing item on the Pensions Sub-Committee agendas
Voting		
The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Compliant	As set out in terms of reference of the Pensions Sub-Committee

Governance Compliance Statement (continued)

Compliance Requirement	Compliance	Notes
Training, facility time and expenses		
That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process	Compliant	As set out in the Council's allowances policy and the Pension Fund Knowledge and Skills policy
That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum	Compliant	As set out in the Council's constitution
Meetings		
That an administering authority's main committee or committees meet at least quarterly.	Compliant	As set out in terms of reference of the Pensions Sub-Committee
That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits	Not applicable	All Pension Fund matters are considered by the Pensions Sub-Committee.
That administering authorities who do not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented	Compliant	Represented on the Pensions Board
Access		
That subject to any rules in the council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee	Compliant	As set out in the Council's constitution
Scope		
That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements	Compliant	as set out in terms of reference of the Pensions Sub-Committee
Publicity		
That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements	Compliant	All meeting minutes, reports and Pension Fund policies are published on the Council's website

Appendix 2. Communication Policy

1. BACKGROUND

Regulation 61 of the Local Government Pension Scheme Regulations 2013 requires administering authorities to prepare, publish and maintain a policy statement setting out its communication strategy for communicating with:

- Scheme Members
- Members' representatives
- Prospective members
- Employers participating in the Fund

This is the Local Government Pension Scheme (LGPS) Communications Policy Statement for the London Borough of Hammersmith & Fulham (LBHF).

LBHF in its capacity as the Administering Authority engages with other employers (under their status as Admitted and Scheduled Bodies) and has 4,332 active members, 6,840 deferred members and 5,111 pensioners as at 31st March 2019

This policy document sets out the mechanisms that LBHF uses to meet their communication responsibilities.

2. ROLES AND RESPONSIBILITIES

Retained team within HR

The Retained Team are responsible for setting the pensions administration management strategy which includes the drafting of this document and the allocation of communication responsibilities, including those to third parties.

They are also responsible for the monitoring of the quality, timeliness and accuracy of pensions communications from third parties and for the periodic review of this document.

The Retained Team will approve significant communications prior to them being issued that have been drafted on behalf of LBHF by Surrey County Council (SCC) and Hampshire County Council (HCC).

Surrey County Council

SCC are responsible for the day to day transactional pensions administration service under a section 101 agreement with LBHF.

Under this agreement SCC are responsible for the quality, timeliness and accuracy of pensions communications within their normal business activities.

They are also responsible for communications within specific projects and tasks agreed and allocated to them by the Retained Team.

3. HOW INFORMATION IS COMMUNICATED

The table below shows the LBHF communication methods, the frequency of issue and the intended audiences.

Communication Type	Paper Based	Website	Intranet	Face to face	Electronic	Frequency of issue	Communication method	Active member	Deferred member	Pensioner	Prospective members	Employers	Union Reps	Pension fund committee	Pension Board	Residents and taxpayers	Media	Other stakeholders
Joiner information with Scheme details	✓	✓				During the recruitment process and upon request	Sent to home address/via employers				✓	✓	✓					
Newsletters	✓	✓				Annually and/or when the scheme changes	Sent to home address/via employers	✓	✓	✓	✓	✓	✓					
Fund Reports and Accounts			✓			Continually available	Link publicised	✓										
Annual Benefit Statements	✓					Annually and on request	Sent to home address and/or via employers for active members. Sent to home address for deferred members	✓	✓									
Factsheets	✓	✓				On request	On request	✓	✓	✓	✓	✓	✓					
Roadshows				✓		When major scheme changes occur	Advertised in newsletters, via posters	✓										
Personal discussions				✓		When required	Displayed in the workplace	✓	✓	✓	✓							
Posters	✓					Continually available	On request	✓			✓							
Employers Guide		✓				Annually	Annually					✓						

Communication Type	Paper Based	Website	Intranet	Face to face	Electronic	Frequency of issue	Communication method	Active member	Deferred member	Pensioner	Prospective members	Employers	Union Reps	Pension fund committee	Pension Board	Residents and taxpayers	Media	Other stakeholders
Employers meetings				✓		Annually	Notifications sent					✓						
Briefing papers	✓				✓	When required	Within Committee papers dispatch							✓	✓			
Committee Reports	✓				✓	With the committee cycle	Within Committee papers dispatch							✓	✓			
Training and Development				✓	✓	Available and/or as when requested	On request	✓			✓			✓	✓			
Press releases					✓	As required	Email										✓	
Other employers joining the fund					✓	As required	Email											✓
Pension disputes IDRP					✓	As required	Email											✓
Statutory returns and questionnaires					✓	As required	Email							✓	✓			✓

4. DETAILS OF WHAT IS COMMUNICATED

Joiner information with Scheme details

A document providing an overview of the LGPS, including who can join, the contribution rates, the retirement and death benefits and how to increase the value of benefits.

Newsletters

An annual newsletter which provides updates on changes to the LGPS as well as other related news, such as national changes to pensions regulations, forthcoming roadshows and contact details.

Fund Report and Accounts

Details of the value of the Pension Fund during the financial year, income and expenditure etc.

Annual Benefit Statements

For active members these include the value of current and projected benefits. The associated death benefits are also shown along with details of any individuals nominated to receive the lump sum death grant.

In relation to deferred members, the benefit statement includes the current value of the deferred benefits and the earliest payment date of the benefits as well as the associated death benefits.

Factsheets

Information that provides a summary in relation to specific topics, such as topping up pension rights, transfer values in and out of the scheme, death benefits and, for pensioners, annual pensions increases.

Roadshows

As required a representative from SCC and/or the Retained Team will visit a particular location to provide a presentation on a particular topic of interest.

Face to face/personal discussions.

Face to face discussions with a representative from SCC and/or the Retained Team to discuss personal circumstances.

Posters

These are to engage with staff that are not in the LGPS, to help them to understand the benefits of participating in the scheme and to provide guidance on how to join.

Employers' Guide

A detailed guide that provides guidance on the employer responsibilities including the forms and other necessary communications.

Employers meeting

A seminar style event with a number of speakers covering topical LGPS issues.

Briefing papers

Formal briefings that highlight key issues or developments relating to the LGPS and the Fund, these are used by senior managers when attending committee meetings.

Committee papers

Formal documents setting out relevant issues in respect of the LGPS, in many cases seeking specific decisions or directions from elected members.

Training and Development.

Pension issues are included in appropriate training and development events – specific pension training and development events are run at significant times such as when the scheme changes.

Press releases

Bulletins providing briefing commentary on LBHF's opinion on various matters relating to the Pension Fund, for example. the actuarial valuation results.

Other employers joining the fund

A legal requirement to notify both organisations of the name and type of employer entered into the Fund (e.g. following the admission of third party service providers into the scheme).

Pension disputes IDRP

Formal notification of pension dispute resolutions to the complainant, together with any additional correspondence relating to the dispute.

Statutory returns and questionnaires

Statutory and various questionnaires that are received, requesting specific information in relation to the structure of the LBHF fund or the composition of the Fund.

Communication Policy (continued)

FURTHER INFORMATION

If you need more information about the Scheme you should contact Surrey County Council at the following address:

Surrey County Council

Pension Services (LBHF Team)
Surrey County Council
Room G59, County Hall
Penrhyn Road
Kingston upon Thames
Surrey KT1 2DN
Email: *myhelpdeskpensions@surreycc.gov.uk*

General enquiries and complaints:
Helpdesk: 0208 231 2802
General enquiries and complaints: 0208 541 9293

RETAINED HR TEAM

Maria Bailey
Pensions Manager
Royal Borough of Kensington and Chelsea,
Town Hall,
Hornton Street,
London
W8 7NX

Email: Maria.Bailey@rbkc.gov.uk
Phone: 0207 361 2333

Appendix 3. Funding Strategy Statement

1. PURPOSE OF THE FUNDING STRATEGY STATEMENT

1.1 The purpose of this Funding Strategy Statement is to explain the funding objectives of the London Borough of Hammersmith and Fulham Pension Fund (the "Fund") and in particular:

- How the costs of the benefits provided under the Local Government Pension Scheme (the "Scheme") are met though the Fund in a prudent way;
- The objectives in setting employer contribution rates and the desirability of maintaining stability in the primary contribution rate; and
- Ensuring that the regulatory requirements to set contributions that will maintain the solvency and long-term cost-efficiency of the Fund are met.

2. AIMS AND PURPOSE OF THE FUND

2.1 The aims of the Fund are to:

- Manage employers' liabilities effectively and ensure that sufficient resources are available to meet all liabilities as they fall due;
- Enable primary contribution rates to be kept as nearly constant as possible; and
- Seek returns on investment within reasonable risk parameters.

2.2 The purpose of the Fund is to:

- Pay pensions, lump sums and other benefits under the Regulations;
- Meet the costs associated in administering the Fund;
- Receive monies in respect of contributions, transfer values and investment income.

3. RESPONSIBILITIES OF KEY PARTIES

3.1 The key parties involved in the funding process and their responsibilities are as follows:

The Administering Authority

3.2 The Administering Authority for the Pension Fund is the London Borough of Hammersmith and Fulham. The main responsibilities of the Administering Authority are:

- Operate a pension fund
- Collect employee and employer contributions investment income and other amounts due to the Fund, as stipulated in the LGPS Regulations;
- Invest the Fund's assets in accordance with the LGPS regulations;
- Pay the benefits due to Scheme members; as stipulated by the LGPS regulations;
- Ensure that cash is available to meet liabilities as and when they fall due;
- Take measures as set out in the regulations to safeguard the Fund against the consequences of employer default;
- Manage the actuarial valuation process in conjunction with the Fund Actuary;
- Prepare and maintain this FSS, the SIP and ISS after consultation with other interested parties; and
- Monitor all aspects of the Fund's performance and funding, amending the FSS and ISS accordingly;
- Manage any potential conflicts of interest arising from the Borough's dual role as scheme employer and fund administrator
- Enable the pension board to review the valuation process as set out in their terms of reference.

Individual Employers

3.3 In addition to the Administering Authority, various scheduled and admitted bodies participate in the Fund.

The responsibilities of each individual employer that participates in the Fund, including the administering authority, are to:

- Deduct contributions from employees' salaries correctly and pay these, together with their own employer contributions as certified by the Fund Actuary, to the administering authority within the statutory timescales;
- Notify the administering authority of all changes in Scheme membership and any other membership changes promptly;
- Exercise any discretions permitted under the Regulations; and
- Meet the costs of any augmentations or other additional costs, such as early retirement strain, in accordance with agreed policies and procedures.

The Fund Actuary

3.4 The Pension Fund's Actuary is Barnett Waddingham LLP. Their main responsibilities of the Fund Actuary are to:

- Prepare valuations including the setting of employers' contribution rates at a level to ensure Fund solvency and long-term cost efficiency, after agreeing assumptions with the administering authority and having regard to the FSS and the LGPS regulations;
- Prepare advice and calculations in connection with bulk transfers and the funding aspects of individual benefit related matters, such as pension strain costs, ill health retirement costs, compensatory added years costs, etc.;
- Provide advice and valuations on the exiting of employers from the Fund;
- Advise the administering authority on Bonds and other forms of security against the financial effect on the Fund of employer default;
- Assist the administering authority in assessing whether employer contributions need to be revised between valuations, as permitted or required by the regulations;
- Ensure that the administering authority is aware of any professional guidance or other professional requirements that may be of relevance to the administrator's role in advising the fund; and
- Advise on other actuarial matters affecting the financial position of the Fund.

4. SOLVENCY ISSUES AND TARGET FUNDING LEVELS

4.1 Given the statutory position of the LGPS administering authorities and the tax-backed nature of employing authorities who make up the core of the Scheme and the statutory basis of the Scheme, the LGPS remains outside the solvency arrangements established for private sector occupational pension schemes.

4.2 LGPS regulations require each administering authority to secure fund solvency and long-term cost efficiency by means of employer contribution rates established by mandatory valuation exercises.

4.3 Maintaining as nearly a constant a primary employer contribution rate is a desirable outcome, but not a regulatory requirement. It is for LGPS administering authorities to seek to achieve a balance between the objectives in a prudent manner.

4.4 Solvency is defined as meaning that the rate of employer contributions should be set at such a level as to ensure that the scheme's liabilities can be met as they arise. This does not mean that the Fund should always be 100% funded, but that the rate of employer contributions should be set to target a funding level for the whole fund of 100% over an appropriate time period and using an appropriate set of actuarial assumptions.

4.5 Employers should collectively have the financial capacity to increase employer contributions and/or the Fund should be able to realise contingent assets if future circumstances require, in order to continue to target a funding level of 100%. If these conditions are met, it is anticipated that the Fund will be able to pay scheme benefits as they fall due.

4.6 The rate of employer contributions shall be deemed to be set at an appropriate level to ensure long-term cost efficiency, if the rate of employer contributions is sufficient to make provision for the cost of current benefit accrual, with an appropriate adjustment to the rate for any surplus or deficit in the Fund. The Government Actuary's Department (GAD) will assess whether this condition is met.

5. PRIMARY RATE OF THE EMPLOYERS' CONTRIBUTION

5.1 The primary rate for each employer is that employer's future service contribution rate which is the contribution rate required to meet the cost of the future accrual of benefits, expressed as a percentage of pensionable pay, ignoring any past service surplus or deficit, but allowing for any specific employer circumstances.

5.2 The primary rate for the whole Fund is the weighted average, by payroll, of the individual employers' primary rates.

5.3 The secondary rate of the employer's contribution is an adjustment to the primary rate to arrive at the rate each employer is required to pay. It may be expressed either as a percentage adjustment to the primary rate and/or as a cash adjustment for each of the three years of the inter-valuation period. This will be set out in the rates and adjustments certificate. For any employer, the rate they are actually required to pay is the sum of the primary and secondary rates.

5.4 The actuary should disclose the secondary rates for the whole scheme in each of the three inter-valuation years. These should be calculated as a weighted average based on the whole scheme payroll. The purpose of this is to facilitate a single net rate of contributions expected to be received over each of the three years that can be readily compared with other rates and reconciled with actual receipts.

6. SOLVENCY ISSUES AND NON-LOCAL AUTHORITY EMPLOYERS

6.1 The number and type of non-local government bodies operating within the LGPS has grown considerably since 2004, when Funding Strategy Statements were first introduced. There are now many more private sector contractors, companies spun off from local authorities and academies which have employees who continue to qualify for membership by dint of transferred rights under the TUPE regulations. Employees in academies qualify for the scheme because of academies' scheduled body status. Key issues are:

- The need to set appropriate employer contribution levels and deficit recovery periods for these employers which do not have tax-raising powers and therefore have weaker covenants than local authorities;
- The underlying investment strategy of the assets backing the liabilities of these employers;
- The financial standing of those employers (or their parent companies or guarantors) and their ability to meet the cost of current membership, fund any deficit and ability to ensure against default;
- The long-term and short-term effects of high contribution rates on non-local authority employers in terms of their financial viability.

6.2 In the interests of transparency, the FSS should clearly set out the risk assessment methodology to assess the long-term financial health of employers and how this will be monitored. This is undertaken by:

- Having the correct Risk Assessments made when new Admitted and Scheduled bodies join the fund and security via a bond is requested;
- Admitted and Scheduled bodies being consulted on Triennial revaluation rates; and
- Pension contributions being monitored "in year" to ensure Admitted and Scheduled bodies are making the required payments.

7. VALUATION ASSUMPTIONS AND FUNDING MODEL

7.1 In completing the actuarial valuation, it is necessary to formulate assumptions about the factors affecting the Fund's future finances such as inflation, pay increases, investment returns, rates of mortality, early retirement and staff turnover etc.

7.2 The assumptions adopted at the valuation can therefore be considered as:

- The statistical assumptions which are essentially estimates of the likelihood of benefits and contributions being paid; and
- The financial assumptions which will determine the estimates of the amount of benefits and contributions payable and their current or present value.

Future Price Inflation

7.3 The base assumption in any valuation is the future level of price inflation over a period commensurate with the duration of the liabilities. This is derived by considering the average difference in yields over the appropriate period from conventional and index linked gilts during the six months straddling the valuation date to provide an estimate of future price inflation as measured by the Retail Price Index (or "RPI").

Future Pay Inflation

7.4 As some of the benefits are linked to pay levels at retirement, it is necessary to make an assumption as to future levels of pay inflation. Historically, there has been a close link between price and pay inflation with pay increases exceeding price inflation in the longer term. However, in recent years, this model has broken down due to pay freezes in the public sector and continuing restraint to restrict salary growth across many sectors.

Future Pension Increases

7.5 Pension increases are linked to changes in the level of the Consumer Price Index (or "CPI"). Inflation as measured by the CPI has historically been less than RPI due mainly to different calculation methods. An adjustment is therefore made to the RPI assumption to derive the CPI assumption.

Future Investment Returns/Discount Rate

7.6 To determine the value of accrued liabilities and derive future contribution requirements it is necessary to discount future payments to and from the Fund to present day values.

7.7 The discount rate that is adopted will depend on the funding target adopted for each employer.

7.8 For open employers, the discount rate that is applied to all projected liabilities reflects a prudent estimate of the rate of investment return that is expected to be earned from the underlying investment strategy by considering average market yields in the six months straddling the valuation date. The discount rate so determined may be referred to as the "on-going" discount rate.

7.9 For closed employers, an adjustment may be made to the discount rate in relation to the remaining liabilities, once all active members are assumed to have retired if at that time (the projected "termination date"), the employer either wishes to leave the Fund, or the terms of their admission require it.

7.10 The Fund Actuary will incorporate such an adjustment after consultation with the Administering Authority.

7.11 The adjustment to the discount rate for closed employers is to set a higher funding target at the projected termination date, so that there are sufficient assets to fund the remaining liabilities on a "minimum risk" rather than on an on-going basis. The aim is to minimise the risk of deficits arising after the termination date.

Asset Valuation

7.12 For the purposes of the valuation, the asset value used is the market value of the accumulated Fund at the valuation date adjusted to reflect average market conditions during the six months straddling the valuation date.

Statistical Assumptions

8.13 The statistical assumptions incorporated into the valuation, such as future mortality rates, are based on national statistics. These are adjusted as appropriate to reflect the individual circumstances of the Fund and/or individual employers.

8. DEFICIT RECOVERY/SURPLUS AMORTISATION PERIODS

8.1 Whilst one of the funding objectives is to build up sufficient assets to meet the cost of benefits as they accrue, it is recognised that at any particular point in time, the value of the accumulated assets will be different to the value of accrued liabilities, depending on how the actual experience of the Fund differs to the actuarial assumptions. Accordingly, the Fund will normally either be in surplus or in deficit.

8.2 Where the actuarial valuation discloses a significant surplus or deficit then the levels of required employers' contributions will include an adjustment to either amortise the surplus or fund the deficit over a period of years.

8.3 The period that is adopted for any particular employer will depend on:

- The significance of the surplus or deficit relative to that employer's liabilities;
- The covenant of the individual employer and any limited period of participation in the Fund; and
- The implications in terms of stability of future levels of employers' contribution.

9. POOLING OF INDIVIDUAL EMPLOYERS

9.1 The policy of the Fund is that each individual employer should be responsible for the costs of providing pensions for its own employees who participate in the Fund. Accordingly, contribution rates are set for individual employers to reflect their own particular circumstances.

9.2 However, certain groups of individual employers are pooled for the purposes of determining contribution rates to recognise common characteristics or where the number of Scheme members is small. This is the reason for pooling academies within the Fund.

9.3 The main purpose of pooling is to produce more stable employer contribution levels in the longer term whilst, recognising that ultimately there will be some level of cross-subsidy of pension cost amongst pooled employers.

10. CESSATION VALUATIONS

10.1 On the cessation of an employer's participation in the Scheme, the Fund Actuary will be asked to make a termination assessment. Any deficit in the Fund in respect of the employer will be due to the Fund as a termination contribution, unless it is agreed by the Administering Authority and the other parties involved that the assets and liabilities relating to the employer will transfer within the Fund to another participating employer.

10.2 In assessing the deficit on termination, the Fund Actuary may adopt a discount rate based on gilt yields and adopt different assumptions to those used at the previous valuation in order to protect the other employers in the Fund from having to fund any future deficits which may arise from the liabilities that will remain in the Fund.

11. LINKS WITH THE INVESTMENT STRATEGY STATEMENT

11.1 The main link between the Funding Strategy Statement (FSS) and the ISS relates to the discount rate that underlies the funding strategy as set out in the FSS, and the expected rate of investment return which is expected to be achieved by the underlying investment strategy as set out in the ISS.

11.2 As explained above, the on-going discount rate that is adopted in the actuarial valuation is derived by considering the expected return from the underlying investment strategy. This ensures consistency between the funding strategy and investment strategy.

12. RISKS AND COUNTERMEASURES

12.1 Whilst the funding strategy attempts to satisfy the funding objectives of ensuring sufficient assets to meet pension liabilities and stable levels of employer contributions, it is recognised that there are risks that may impact on the funding strategy and hence the ability of the strategy to meet the funding objectives.

12.2 The major risks to the funding strategy are financial, although there are other external factors including demographic risks, regulatory risks and governance risks.

Funding Strategy Statement (continued)

13. FINANCIAL RISKS

13.1 The main financial risk is that the actual investment strategy fails to produce the expected rate of investment return (in real terms) that underlies the funding strategy. This could be due to a number of factors, including market returns being less than expected and/or the fund managers who are employed to implement the chosen investment strategy failing to achieve their performance targets.

13.2 The valuation results are most sensitive to the real discount rate. Broadly speaking an increase/decrease of 0.5% per annum in the real discount rate will decrease/increase the liabilities by 10%, and decrease/increase the required employer contribution by around 2.5% of payroll.

13.3 However, the Pensions Sub-committee regularly monitors the investment returns achieved by the fund managers and receives advice from the independent advisers and officers on investment strategy.

13.4 The Pensions Sub-committee may also seek advice from the Fund Actuary on valuation related matters.

13.5 In addition, the Fund Actuary provides funding updates between valuations to check whether the funding strategy continues to meet the funding objectives.

14. DEMOGRAPHIC RISKS

14.1 Allowance is made in the funding strategy via the actuarial assumptions for a continuing improvement in life expectancy. However, the main demographic risk to the funding strategy is that it might underestimate the continuing improvement in longevity. For example, an increase of one year to life expectancy of all members in the Fund will reduce the funding level by between 0.5 to 1%.

14.2 The actual mortality of pensioners in the Fund is monitored by the Fund Actuary at each actuarial valuation and assumptions are kept under review.

14.3 The liabilities of the Fund can also increase by more than has been planned as a result of early retirements.

14.4 However, the Administering Authority monitors the incidence of early retirements; and procedures are in place that require individual employers to pay additional amounts into the Fund to meet any additional costs arising from early retirements.

15. REGULATORY RISKS

15.1 The benefits provided by the Scheme and employee contribution levels are set out in Regulations determined by central government. The tax status of the invested assets is also determined by central government.

15.2 The funding strategy is therefore exposed to the risks of changes in the Regulations governing the Scheme and changes to the tax regime which may affect the cost to individual employers participating in the Scheme.

15.3 However, the Administering Authority participates in any consultation process of any proposed changes in Regulations and seeks advice from the Fund Actuary on the financial implications of any proposed changes.

16. GOVERNANCE

16.1 Many different employers participate in the Fund. Accordingly, it is recognised that a number of employer-specific events could impact on the funding strategy including:

- Structural changes in an individual employer's membership;
- An individual employer deciding to close the Scheme to new employees; and
- An employer ceasing to exist without having fully funded their pension liabilities.

16.2 However, the Administering Authority monitors the position of employers participating in the Fund, particularly those which may be susceptible to the events outlined, and takes advice from the Fund Actuary when required.

16.3 In addition, the Administering Authority keeps in close touch with all individual employers participating in the Fund to ensure that, as Administering Authority, it has the most up to date information available on individual employer situations. It also keeps individual employers briefed on funding and related issues.

17. MONITORING AND REVIEW

17.1 This FSS is reviewed formally, in consultation with the key parties, at least every three years to tie in with the triennial actuarial valuation process.

17.2 The Administering Authority also monitors the financial position of the Fund between actuarial valuations and may review the FSS more frequently if necessary.

Investment Strategy Statement

1. PURPOSE OF THE FUNDING STRATEGY STATEMENT

1.1 This is the first Investment Strategy Statement (ISS) adopted by the London Borough of Hammersmith & Fulham Pension Fund ("the Fund").

Under the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 the London Borough of Hammersmith & Fulham Pension Fund is required to publish this ISS. It replaces the Statement of Investment Principles which was previously required under Schedule 1 of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009.

The Regulations require administering authorities to outline how they meet each of 6 objectives aimed at improving the investment and governance of the Fund.

This Statement addresses each of the objectives included in the 2016 Regulations:

- A requirement to invest fund money in a wide range of instruments
- The authority's assessment of the suitability of particular investments and types of investment
- The authority's approach to risk, including the ways in which risks are to be measured and managed
- The authority's approach to pooling investments, including the use of collective investment vehicles
- The authority's policy on how social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments

We deal with each of these in turn below.

1.3 The Pension Sub-Committee of the Fund oversees the management of the Fund's assets. Although not trustees, the Members of the Pension Sub- Committee owe a fiduciary duty similar to that of trustees to the council-tax payers, who would ultimately have to meet any shortfall in the assets of the Fund, as well as to the contributors and beneficiaries of the Fund.

1.4 The relevant terms of reference for the Pension Sub-Committee within the Council's Constitution are:

- To make all decisions under Regulations made pursuant to Sections 7, 12 or 24 of the Superannuation Act not otherwise falling to the Director of Finance to determine as set out in the officers' scheme of delegation.
- Consideration and approval of the authority statement of accounts in accordance with the relevant Accounts & Audit Regulations made from time to time.
- The Committee shall be a member of the Local Authority Pension Fund Forum. The role of the Pensions Sub-Committee is to have responsibility for all aspects of the investment and other management activity of the Fund:
- To agree the investment strategy and strategic asset allocation having regard to the advice of the fund managers and the Investment Consultant.
- To monitor performance of the Pension Fund, individual fund managers, custodians, actuary and other external advisors to ensure that they remain suitable;
- To determine the Fund management arrangements, including the appointment and termination of the appointment of the Fund Managers, Actuary, Custodians and Fund Advisers.
- To agree the ISS, the Funding Strategy Statement, the Business Plan for the Fund, the Governance Policy Statement, the Communications Policy Statement and to ensure compliance with these.
- To approve the final statement of accounts of the Fund and to approve the Annual Report.
- To receive actuarial valuations of the Fund regarding the level of employers' contributions necessary to balance the Fund.

Investment Strategy Statement (continued)

- To oversee and approve any changes to the administrative arrangements, material contracts and policies and procedures of the Council for the payment of pensions, and allowances to beneficiaries.
- To make and review an admission policy relating to admission agreements generally with any admission body.
- To ensure compliance with all relevant statutes, regulations and best practice with both the public and private sectors.
- To review the arrangements and managers for the provision of Additional Voluntary Contributions for fund members.
- To receive and consider the Auditor's report on the governance of the Fund.
- To determine any other investment or pension fund policies that may be required from time to time so as to comply with Government regulations and to make any decisions in accordance with those policies.

The Pension Sub-Committee has responsibility for:

- Determining an overall investment strategy and strategic asset allocation, with regard to diversification and the suitability of asset classes
- Appointing the investment managers, an independent custodian, the actuary, the investment advisor(s) and any other external consultants considered necessary
- Reviewing on a regular basis the investment managers' performance against benchmarks, portfolio risk and satisfying themselves as to the managers' expertise and the quality of their internal systems and controls
- Monitoring compliance with the ISS & Funding Strategy Statement (FSS) and reviewing its contents
- Reviewing social, environmental and ethical considerations policies, and the exercise of voting rights

The Director of Finance and the appointed consultants and actuaries support the Committee. The day-to-day management of the Fund's assets is delegated to investment managers.

1.5 This ISS will be reviewed at least once a year, or more frequently as required - in particular following valuations, future asset/liability studies and performance reviews, which may indicate a need to change investment policy, or significant changes to the FSS.

1.6 Under the previous Regulations the Statement of Investment Principles required administering authorities to state how they complied with the revised six investment principles as outlined within the CIPFA Pensions Panel Principles. Although not formally required under the 2016 Regulations this information is given in Appendix A.

2. OBJECTIVE 7.2 (A): A REQUIREMENT TO INVEST FUND MONEY IN A WIDE RANGE OF INSTRUMENTS

2.1 Funding and investment risk is discussed in more detail later in this ISS. However, at this stage it is important to state that the Committee is aware of the risks it runs within the Fund and the consequences of these risks.

2.2 In order to control risk the Pension Sub-Committee recognises that the Fund should have an investment strategy that has:

- Exposure to a diverse range of sources of return, such as market, manager skill and through the use of less liquid holdings.
- Diversity in the asset classes used.
- Diversity in the approaches to the management of the underlying assets.

2.3 This approach to diversification has seen the Fund dividing its assets across 7 broad categories; UK equities, Global equities, Secure Income, Dynamic Asset Allocation, Absolute Return Bonds, Inflation Opportunities and Long Lease Property. **The table in Section 5 (on page 8)** below shows current asset allocation. The size of assets invested in each category will vary depending on investment conditions. However, it is important to note that each category is itself diversified

2.4 The main risk the Pension Sub-Committee is concerned with is to ensure the long-term ability of the fund to meet pension and other benefit obligations, as they fall due, is met. As a result, the Pension Sub-Committee place a high degree of importance on ensuring the expected return on the assets is sufficient to do so, and does not have to rely on a level of risk which the Pension Sub- Committee considers excessive.

The Fund currently has a surplus of income over expenditure when taking into account investment income. The Pensions Sub-Committee keeps the liquidity within the Fund monitored through regular reporting of cash flows.

At all times the Pension Sub-Committee takes the view that their investment decisions, including those involving diversification, in the best long-term interest of Fund beneficiaries.

2.5 To mitigate these risks the Pension Sub-Committee regularly reviews both the performance and expected returns from the Fund's investments to measure whether it has met, and is likely to meet in future, its return objective. In addition to keeping their investment strategy and policy under regular review the Pension Sub-Committee will keep this ISS under review to ensure that it reflects the approaches being taken.

3. OBJECTIVE 7.2 (B)
THE AUTHORITY'S ASSESSMENT OF THE SUITABILITY OF PARTICULAR INVESTMENTS AND TYPES OF INVESTMENT

3.1 When assessing the suitability of investments, the Fund considers a number of factors:

- Prospective return
- Risk
- Concentration
- Risk management qualities the asset has, when the portfolio as a whole is considered
- Geographic and currency exposures
- Whether the management of the asset meets the Fund's ESG criteria

3.2 Suitability is a critical test for whether or not a particular investment should be made. Each of the Fund's investments has an individual performance benchmark which their reported performance is measured against

3.3 The Pension Sub-Committee monitors the suitability of the Fund's assets on a quarterly basis. To that end, they monitor the investment returns and the volatility of the individual investments together with the Fund level returns and risk. This latter point being to ensure the risks caused by interactions between investments within the portfolio is properly understood. Where comparative statistics are available the Pension Sub-Committee will also compare the Fund asset performance with those of similar funds.

3.4 The Pension Sub-Committee relies on external advice in relation to the collation of the statistics for review.

4. OBJECTIVE 7.2 (C)
THE AUTHORITY'S APPROACH TO RISK, INCLUDING WAYS IN WHICH RISKS ARE TO BE MEASURED AND MANAGED

4.1 The Pension Sub-Committee recognises that there are a number of risks involved in the investment of the assets of the Fund amongst which are the following:

4.2 **Geopolitical and currency risk:**

- are measured by the value of assets (the concentration risk), in any one market leading to the risk of an adverse influence on investment values arising from political intervention; and
- are managed by regular reviews of the actual investments relative to policy and through regular assessment of the levels of diversification within the existing policy.

Investment Strategy Statement (continued)

4.3 Manager risk:

- is measured by the expected deviation of the prospective risk and return as set out in the manager(s) investment objectives, relative to the investment policy; and
- is managed by monitoring the actual deviation of returns relative to the objective and factors inherent in the manager(s) investment process.

4.4 Solvency and mismatching risk

- are measured through a qualitative and quantitative assessment of the expected development of the liabilities relative to the current and alternative investment policies; and
- are managed by assessing the progress of the actual growth of the liabilities relative to the selected investment policy.

4.5 Liquidity risk:

- is measured by the level of cash flow required over a specified period; and
- managed by assessing the level of cash held in order to limit the impact of the cash flow requirements on the investment cash policy

4.6 Custodial risk:

- is measured by assessing the creditworthiness of the global custodian and the ability of the organisation to settle trades on time and provide secure safekeeping of the assets under custody.

4.7 Employer contributions are based upon financial and demographic assumptions determined by the actuary. The main risks to the Fund are highlighted within sections 12 to 15 of the Funding Strategy Statement. The risks to the Fund are controlled in the following ways:

- The adoption and monitoring of asset allocation benchmarks, ranges and performance targets constrain the investment managers from deviating significantly from the intended approach while permitting the flexibility for managers to enhance returns
- The appointment of more than one manager with different mandates and approaches provides diversification of manager risk

4.8 The investment management agreements constrain the manager's actions in areas of particular risk and set out the respective responsibilities of both the manager and the Fund.

4.9 The Fund and the Pension Sub-Committee are aware investment risk is only one aspect of the risks facing the Fund. The other key risk they are aware of is the ability of the Fund to ascertain the required future contributions, support the investment risk (i.e. the level of volatility of investment returns) and underwrite actuarial risk, namely the volatility in the actuarial funding position and the impact this has on contributions.

4.10 The Fund and the Pension Sub-Committee are of the view that the diversification of the Fund assets is sufficiently broad to ensure the investment risk is low and will continue to be low. When putting in place the investment strategy the Pension Sub-Committee carefully considered both the individual asset risk characteristics and those of the combined portfolio to ensure the risks were appropriate.

4.11 Estimating the likely volatility of future investment returns is difficult as it relies on both estimates of individual asset class returns and also the correlation between them. These can be based on historic asset class information for some of the listed asset classes the Fund uses. However, for other private market and less liquid assets it is much more difficult.

4.12 The Pension Sub-Committee is also mindful that correlations change over time and at times of stress can be significantly different from they are in more benign market conditions.

4.13 To help manage risk the Pension Sub-Committee uses an external investment adviser to monitor the risk. In addition, when carrying out their investment strategy review the Pension Sub-Committee also had different investment advisers assess the level of risk involved.

4.14 The Fund targets a return of 5.9% as aligned with the latest triennial valuation from the actuary. The investment strategy is considered to have a low degree of volatility.

4.15 When reviewing the investment strategy on a quarterly basis the Pension Sub- Committee considers advice from their advisers and the need to take additional steps to protect the value of the assets that may arise or capitalise on opportunities if they are deemed suitable.

4.16 At each review of the Investment Strategy Statement the assumptions on risk and return and their impact on asset allocation will be reviewed.

5. OBJECTIVE 7.2 (D) THE AUTHORITY'S APPROACH TO POOLING INVESTMENTS, INCLUDING THE USE OF COLLECTIVE INVESTMENT VEHICLES

5.1 The Fund recognises the Government's requirement for LGPS funds to pool their investments and is committed to pursuing a pooling solution that ensures maximum cost effectiveness for the Fund, both in terms of return and management cost.

5.2 The Fund has formally agreed to join the London Collective Investment Vehicle (CIV) as part of the Government's pooling agenda. The London CIV has been operational for some time and is in the process of opening a range of sub-funds covering liquid asset classes, with less liquid asset classes to follow.

5.3 The Fund has already transitioned assets into the London CIV with a value of £625.8m or 59.7% of the assets and will look to transition further liquid assets as and when there are suitable investment strategies available on the platform that meet the needs of the Fund.

5.4 The Fund will transition liquid assets into the London CIV when there are suitable investment strategies that meet the asset allocation and investment strategy available on the London CIV platform. The Fund anticipates being able to transition some of the liquid assets across in advance of April 2018.

5.5 The Fund is monitoring developments and the opening of investment strategy fund openings on the London CIV platform with a view to transitioning liquid assets across to the London CIV as soon as there are suitable sub-funds to meet the Fund's investment strategy requirements.

5.6 The Fund holds £76.4m or 7.3% of the Fund held in illiquid assets and these will remain outside of the London CIV pool. The cost of exiting these strategies early would have a negative financial impact on the Fund. These will be held as legacy assets until such time as they mature and proceeds re-invest through the pool assuming it has appropriate strategies available or until the Fund changes asset allocation and makes a decision to disinvest.

5.7 The Fund and the Pension Sub-Committee are aware that certain of the assets held within the Fund have limited liquidity and moving them would come at a cost. Whilst it is the expectation to make use of the London CIV for the management of the majority of the Fund assets in the longer term, the Pension Sub-Committee recognises that transitioning from the current structure to the London CIV will be a protracted exercise spread over a number of years to ensure unnecessary costs are not incurred.

Investment Strategy Statement (continued)

	Available on the London CIV	Transferred £m
Global Equities		
Majedie	Yes	125.2
UK Equities		
LGIM	Contract negotiated on behalf of LCIV clients	374.0
Multi Asset		
Ruffer	Yes	126.6
Fixed Income	No	
Partner Group –		
Multi-Asset Credit		
M&G Inflation Opportunities		
Oak Hill Advisors		
Infrastructure	No	
Aviva Investors		
Partners Group		
Long Lease Property	No	
Aberdeen Standard		

5.9 At each review of the investment strategy, which will happen at least every three years, the investment of the above assets will be actively considered by the Fund, including in particular whether a collective investment option is appropriate.

6. OBJECTIVE 7.2 (E) HOW SOCIAL, ENVIRONMENTAL OR CORPORATE GOVERNANCE CONSIDERATIONS ARE TAKEN INTO ACCOUNT IN THE SELECTION, NON-SELECTION, RETENTION AND REALISATION OF INVESTMENTS

6.1 The Fund recognises that the neglect of corporate governance and corporate social responsibility may lead to poor or reduced shareholder returns. The Pensions Sub-Committee has considered how the Fund may best implement a corporate social responsibility policy, given the current resources available to the Fund. Accordingly, the Pensions Sub-Committee has delegated social, environmental and ethical policy to the investment managers, but also approved a Governance Strategy. The Pensions Sub-Committee believes this is the most efficient approach whilst ensuring the implementation of policy by each manager is consistent with current best practice and there is appropriate disclosure and reporting of actions taken. To that extent, the Pensions Sub-Committee maintains a policy of non-interference with the day-to-day decision making of the investment managers

6.2 As a responsible investor the Fund wishes to promote corporate social responsibility, good practice and improved performance amongst all companies in which it invests. Whilst there has been a great deal of emphasis on the relationship of business, financial and economic factors to investment performance, the impact on returns of less tangible non-financial and reputational factors is more difficult to identify. Nevertheless, it is clear that adverse publicity relating to low corporate, environmental or social standards can have an adverse impact on shareholder value, the Fund, its beneficiaries and local taxpayers. By having a good public image, the morale of the workforce will be higher, thus making it easier to attract and retain quality employees. The Fund considers that the pursuit of high corporate social responsibility standards by Companies will lead to higher returns in the long term. A good public image may help to increase sales volumes. An improved financial standing will improve credit ratings, thus allowing a company to attract lower cost funding. By addressing outside factors, the company is able to demonstrate an above average standard of management competence which will improve the long-term potential and sustainability of the organisation. At the very least the Fund expects the Companies in which it invests to comply with all applicable laws and regulations in home markets and to conform to local best practice when operating overseas.

Investment Strategy Statement (continued)

6.3 In furtherance of this stance, the Fund will support standards of best practice by Companies in both the disclosure and management of corporate social responsibility issues consistent with the Fund's fiduciary responsibilities. To this end the Fund will pursue a policy of active shareholder engagement with companies using its own efforts, those of its Fund managers and alliances with other investors. The Fund is a member of the Local Authority Pension Fund Forum.

6.4 The Fund will consider excluding certain types of investment from its actively managed portfolios, following appropriate advice on the implications for performance and diversification. Fund managers are instructed not to invest segregated elements of their portfolio in companies that generate over half of their income from tobacco products on investment prospects grounds. Fund managers are required to have policies regarding Environmental, Social and Governance (ESG) issues and to monitor their compliance with those policies.

6.5 The Fund is committed to being a long term steward of the assets in which it invests and expects this approach to protect and enhance the value of the Fund in the long term. In making investment decisions, the Fund seeks and receives proper advice from internal and external advisers with the requisite knowledge and skills. In addition the Pension Sub-Committee undertakes training on a regular basis and this will include on training and information sessions on matters of social, environmental and corporate governance.

6.6 Sections 6.7 to 6.12 below relate to the Fund's holdings in the London CIV.

6.7 The Fund requires its investment managers to integrate all material financial factors, including corporate governance, environmental, social, and ethical considerations, into the decision-making process for all fund investments. It expects its managers to follow good practice and use their influence as major institutional investors and long-term stewards of capital to promote good practice in the investee companies and markets to which the Fund is exposed.

6.8 The Fund expects its external investment managers (and specifically the London CIV through which the Fund will increasingly invest) to undertake appropriate monitoring of current investments with regard to their policies and practices on all issues which could present a material financial risk to the long-term performance of the fund, such as corporate governance and environmental factors. The Fund expects its fund managers to integrate material ESG factors within its investment analysis and decision making.

6.9 Effective monitoring and identification of these issues can enable engagement with boards and management of investee companies to seek resolution of potential problems at an early stage. Where collaboration is likely to be the most effective mechanism for encouraging issues to be addressed, the Fund expects its investment managers to participate in joint action with other institutional investors as permitted by relevant legal and regulatory codes.

6.10 The Fund monitors this activity on an ongoing basis with the aim of maximising its impact and effectiveness.

6.11 The Fund will invest on the basis of financial risk and return having considered a full range of factors contributing to the financial risk including social, environment and governance factors to the extent these directly or indirectly impact on financial risk and return.

6.12 The Fund in preparing and reviewing its Investment Strategy Statement will consult with interested stakeholders including, but not limited to Fund employers, investment managers, Local Pension Board, advisers to the Fund and other parties that it deems appropriate to consult with.

7. OBJECTIVE 7.2 (F) THE EXERCISE OF RIGHTS (INCLUDING VOTING RIGHTS) ATTACHING TO INVESTMENTS

7.1 The Fund is committed to making full use of its shareholder rights. The Fund's policy on voting rights is based on the Cadbury, Greenbury and Hampel codes, as well as the stock exchange combined code, and the principles of protecting shareholder rights, minimising risk and enhancing value.

7.2 The Fund expects its Fund Managers to vote in an appropriate and informed manner and report their voting actions in their quarterly investment reports. The exercise of shareholder's rights is delegated to the Fund Managers as part of their mandate. Fund Managers will vote in accordance with their Corporate Governance Policy Statements. These policy statements have been developed with the recommendations of Institutional Shareholder Service, National Association of Pension Funds and the Association of British Insurers.

7.3 The Pensions Sub-Committee has delegated the Fund's voting rights to its investment managers, who are required, where practical, to make considered use of voting in the interests of the Fund. The Committee expects the investment managers to vote in the best interests of the Fund.

7.4 Sections 7.5 to 7.20 below relate to the Fund's holdings in the London CIV.

7.5 The investment managers are required to regularly report voting actions and highlight where they do not vote in accordance with their stated policy.

7.6 The Fund recognises the importance of its role as stewards of capital and the need to ensure the highest standards of governance and promoting corporate responsibility in the underlying companies in which its investments reside. The Fund recognises that ultimately this protects the financial interests of the Fund and its ultimate beneficiaries. The Fund has a commitment to actively exercising the ownership rights attached to its investments reflecting the Fund's conviction that responsible asset owners should maintain oversight of the companies in which it ultimately invests, recognising that the companies' activities impact upon not only their customers and clients, but more widely upon their employees and other stakeholders and also wider society.

7.7 The Fund's investments through the London CIV are covered by the voting policy of the CIV which has been agreed by the Pensions Sectoral Joint Committee. Voting is delegated to the external managers and monitored on a quarterly basis. The CIV will arrange for managers to vote in accordance with voting alerts issued by the Local Authority Pension Fund Forum (LAPFF) as far as practically possible to do so and will hold managers to account where they have not voted in accordance with the LAPFF directions.

7.8 The Fund will incorporate a report of voting activity as part of its Pension Fund Annual Report which is published on the Council website: http://democracy.lbhf.gov.uk

7.9 The Fund has not issued a separate Statement of Compliance with the Stewardship Code, but fully endorses the principles embedded in the 7 Principles of the Stewardship Code.

7.10 The Fund expects its external investment managers to be signatories of the Stewardship Code and reach Tier One level of compliance or to be seeking to achieve a Tier One status within a reasonable timeframe. Where this is not feasible the Fund expects a detailed explanation as to why it will not be able to achieve this level.

7.11 In addition, the Fund expects its investment managers to work collaboratively with others if this will lead to greater influence and deliver improved outcomes for shareholders and more broadly.

7.12 The Fund through its participation in the London CIV will work closely with other LGPS Funds in London to enhance the level of engagement both with external managers and the underlying companies in which it invests

8. FEEDBACK ON THIS STATEMENT

Any feedback on this investment Strategy Statement is welcomed. If you have any comments or wish to discuss any issues, then please contact:

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Investment Strategy Statement: Appendix A

Compliance with CIPFA Pensions Panel Principles for investment decision making in the local government pension scheme in United Kingdom

DECISION MAKING

Regulation 12(3) of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 requires an administering authority to report on its compliance with the six Myners' Principles, in accordance with guidance given by the Secretary of State. The guidance for the Local Government Pension Scheme is set out in the CIPFA publication "Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012".

The Fund aims to comply with all of the Myners' Principles, recognising it is in all parties' interests if the Fund operates to standards of investment decision-making and governance identified as best practice. It is also recognised as important to demonstrate how the Fund meets such principles and best practice.

The Secretary of State has previously highlighted the principle contained in Roberts

v. Hapwood whose administering bodies exercise their duties and powers under regulations governing the investment and management of Funds:

"A body charged with the administration for definite purposes of funds contributed in whole or in part by persons other than members of that body owes, in my view, a duty to those latter persons to conduct that administration in a fairly business-like manner with reasonable care, skill and caution, and with a due and alert regard to the interest of those contributors who are not members of the body. Towards these latter persons the body stands somewhat in the position of trustees or managers of others".

The Myners' Principles are seen as supporting this approach. The principles, together with the Fund's position on compliance, are set out below:

PRINCIPLE 1 – EFFECTIVE DECISION MAKING

Administrating authorities should ensure that:

- Decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation; and
- Those persons or organizations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest.

Full Compliance

The Council has delegated the management and administration of the Fund to the Pension Sub-Committee, which meets at least quarterly. The responsibilities of the Pension Sub-Committee are described in paragraph 1.4 of the ISS.

The Pension Sub-Committee is made up of elected members of the Council who each have voting rights. Representatives from the admitted and scheduled bodies within the Fund and from trade unions may attend as observers.

The Pension Sub-Committee obtains and considers advice from and is supported by the Director of Finance, Corporate Finance and as necessary from the Fund's appointed actuary, investment managers and advisors. A review of the investment advice received by the Fund was completed in 2016/17 to ensure it continues to be fit for purpose in the changing investment and legislative environment.

The Pension Sub-Committee has delegated the management of the Fund's investments to professional investment managers, appointed in accordance with the scheme's regulations, whose activities are specified in detailed investment management agreements and regularly monitored.

Business plans are presented to the Pension Sub-Committee annually and progress is monitored on a quarterly basis.

Several of the Pension Sub-Committee members have extensive experience of dealing with Investment matters and training is made available to new Pension Sub- Committee members. Pension Sub-Committee Members are required to undertake a minimum of three days of investment training a year – there is an on-going programme of training available to members.

PRINCIPLE 2 – CLEAR OBJECTIVES

An overall investment objective(s) should be set for the Fund that takes account of the pension liabilities, the potential impact on local tax payers, the strength of the covenant for non-local authority employers, and the attitude to risk of both the administering authority and scheme employers, and these should be clearly communicated to advisors and investment managers.

Full Compliance

The aims and objectives of the Fund are set out within the FSS and the ISS. The main Fund objective is to meet the cost of pension liabilities and to enable employer contribution rates to be kept as nearly constant as possible at reasonable cost to the taxpayers and admitted bodies.

The investment strategy has been set with the objective of controlling the risk that the assets will not be sufficient to meet the liabilities of the Fund while achieving a good return on investment (see paragraphs 4 and 5 above). The approach taken reflects the Fund's liabilities and was decided upon without reference to any other funds. The Fund's performance is measured against the investment objective on a quarterly basis.

The Fund's strategy is regularly reviewed.

PRINCIPLE 3 – RISK AND LIABILITIES

In setting and reviewing their investment strategy, administrating authorities should take account of the form and structure of liabilities. These include the implications for local tax payers, the strength of the covenant for participating employers, the risk of their default and longevity risk.

Full Compliance

The Pension Sub-Committee has, in conjunction with its advisers, agreed an investment strategy that is related to the Fund's liabilities. An actuarial valuation of the Fund takes place every three years, with the most recent triennial valuation taking place in 2016. The investment strategy is designed to give diversification and specialisation and achieve optimum return against acceptable risk.

The asset allocation of the Fund is set to maximise the potential to close the funding deficit over future years. The current allocation is outlined in Section 5 of the ISS.

During 2014/15, the Fund established an Admitted/Scheduled Body policy, which outlines its approach to assessing the strength of the covenant for participating employers and the risk assessment undertaken when new employers wish to join the Fund.

PRINCIPLE 4 – PERFORMANCE ASSESSMENT

Arrangements should be in place for the formal measurement of performance of the investments, investment managers and advisors. Administering authorities should also periodically make a formal assessment of their own effectiveness as a decision-making body and report on this to scheme members.

Full Compliance

The Pensions Sub-Committee has appointed investment managers with clear index strategic benchmarks within an overall Investment objective which place maximum accountability for performance against that benchmark on the manager.

The managers are monitored at quarterly intervals against their agreed benchmarks. Independent detailed monitoring of the Fund's performance is carried out by Deloitte, the Fund's investment adviser and by Northern Trust, the Fund's custodian who provide the performance figures. Moreover, portfolio risk is measured on quarterly basis and the risk/return implications of different strategic options are fully evaluated.

The investment adviser is assessed on the appropriateness of the quality of advice given which include the asset allocation recommendations.

The actuary is assessed on the quality and consistency of the actuarial advice received. Both the advisor and the actuary have fixed term contracts which when expired are tendered for under the Official Journal of the European Union (OJEU) procedures.

PRINCIPLE 5 – RESPONSIBLE OWNERSHIP

Administering authorities should:

- Adopt, or ensure their investment managers adopt, the Institutional Shareholders Committee Statement of Principles on the responsibilities of shareholders and agents.
- Include a statement of their policy on responsible ownership in the statement of investment principles.
- Report periodically to scheme members on the discharge of such responsibilities.

Full Compliance

The Fund is committed to making full use of its shareholder rights. The approach used is outlined in Section 7 of the ISS. Authority has been delegated to the investment managers to exercise voting rights on behalf of the Fund. The investment managers are required to report how they have voted in their quarterly reports.

The Fund believes in using its influence as a shareholder to promote corporate social responsibility and high standards of corporate governance in the companies in which it invests – the Fund's approach to this is outlined in Section 7 of the ISS.

The ISS is publicly available to all scheme members.

PRINCIPLE 6 – TRANSPARENCY AND REPORTING

Administering authorities should:

- Act in a transparent manner, communicating with stakeholders on issues relating to their management of investments, its governance and risks, including performance against stated objectives.
- Provide regular communications to scheme members in the form they consider most appropriate

Full Compliance

Links to the Governance Compliance Statement, the ISS, the FSS, the SRI Policy and the Communications Statement are all included in the Pensions Fund Annual Report which is published and is accessible to stakeholders of the Fund on the Council's web site, internal intranet and a website developed specifically for the Fund.

All Pensions Sub-Committee meetings are open to members of the public and agendas and minutes are published on the Council's website and internal intranet. The Fund's Annual Report includes an assessment of the Fund's performance and an extract from the accounts is sent to stakeholders annually.

Investment Strategy Statement: Appendix B

INVESTMENT AND ADMINISTRATION RISK REGISTER

London Borough of Hammersmith & Fulham Pension Fund Risk Register – Investment Risk Register							
Risk Group	Risk Description	Impact Total	Likelihood	Total Risk Score	Mitigation Actions	Revised Likelihood	Net Risk Score
Governance	That the London Collective Investment Vehicle (LCIV) disbands or the partnership fails to produce proposals/solutions deemed sufficiently ambitious.	12	3	**36**	TREAT - 1) Partners for the pool have similar expertise and like-mindedness of the officers and members involved with the fund, ensuring compliance with the pooling requirements. Ensure that ongoing fund and pool proposals are comprehensive and meet government objectives. Member presence on Shareholder Committee and officer groups.	2	**24**
Funding	Scheme members live longer than expected leading to higher than expected liabilities.	11	3	**33**	TREAT – 1) The scheme's liability is reviewed at each triennial valuation and the actuary's assumptions are challenged as required. The actuary's most recent longevity analysis has shown that the rate of increase in life expectancy is going down	2	**22**
Funding	Transfers out of the scheme increase significantly due to members transferring their pensions to DC funds to access cash through new pension freedoms.	10	2	**20**	TOLERATE - Monitor numbers and values of transfers out being processed. If required, commission transfer value report from Fund Actuary for application to Treasury for reduction in transfer values. Evidence has shown that members have not been transferring out of the CARE scheme at the previously anticipated rate due to uncertainty in the economic environment	2	**20**
Funding	Employee pay increases are significantly more than anticipated for employers within the Fund.	10	3	30	TREAT - 1) Fund employers should monitor own experience. 2) Assumptions made on pay and price inflation (for the purposes of IAS19/FRS102 and actuarial valuations) should be long term assumptions. Any employer specific assumptions above the actuary's long-term assumption would lead to further review. 3) Employers to made aware of generic impact that salary increases can have upon the final salary linked elements of LGPS benefits (accrued benefits before 1 April 2014).	2	20

Investment	Significant volatility and negative sentiment in global investment markets following disruptive politically uncertainty caused by the trade war been the US and China	10	3	30	TREAT- 1) Continued dialogue with investment managers re management of political risk in global developed markets. 2) Investment strategy involving portfolio diversification and risk control. 3) Investment strategy review will follow post actuarial 2019 valuation.	2	20
Funding	Price inflation is significantly more than anticipated in the actuarial assumptions: an increase in CPI inflation by 0.1% over the assumed rate will increase the liability valuation by upwards of 1.7%	10	3	30	TREAT- 1) The fund holds investment in index-linked bonds (RPI protection which is higher than CPI) and other real assets to mitigate CPI risk. Moreover, equities will also provide a degree of inflation protection.	2	20
Funding	Changes to LGPS Scheme moving from Defined Benefit to Defined Contribution	10	2	20	TOLERATE - 1) Political power required to effect the change.	2	20
Investment	Investment managers fail to achieve outperformance targets over the longer term: a shortfall of 0.1% on the investment target will result in an annual impact of £1.1m.	9	3	27	TREAT- 1) The Investment Management Agreements (IMAs)clearly state WCC's expectations in terms of investment performance targets. 2) Investment manager performance is reviewed on a quarterly basis. 3) The Pension Fund Committee should be positioned to move quickly if it is felt that targets will not be achieved. 4) Portfolio rebalancing is considered on a regular basis by the Pension Fund Committee. 5) The Fund's investment management structure is highly diversified, which lessens the impact of manager risk compared with less diversified structures.	2	18
Investment	Volatility caused by uncertainty regarding the withdrawal of the UK from the European Union, with the likelihood of a no-deal exit increasing	9	3	27	TREAT- 1) Officers to consult and engage with advisors and investment managers. 2) Future possibility of looking at move from UK to Global benchmarks on UK Equities and UK Property. 3) Possibility of hedging currency and equity index movements.	2	18
Investment	Increased risk to global economic stability likely to lead to heightened uncertainty and deterioration in economic outlook in advanced economies. This would setback growth and confidence leading to tightened financial conditions, reduced risk appetite and raised credit risks.	8	3	24	TREAT- 1) Increased vigilance and continued dialogue with managers as to events on and over the horizon. 2) Continued investment strategy involving portfolio diversification and risk control. 3) Investment strategy review will follow post actuarial 2019 valuation.	2	16

Funding	Impact of economic and political decisions on the Pension Fund's employer workforce.	8	2	16	TOLERATE - 1) Barnet Waddingham uses prudent assumptions on future of employees within workforce. Employer responsibility to flag up potential for major bulk transfers outside of the Westminster Fund. The potential for a significant reduction in the workforce as a result of the public sector financial pressures may have a future impact on the Fund. 2) Need to make prudent assumptions about diminishing workforce when carrying out the triennial actuarial valuation.	2	16
Governance	London CIV has inadequate resources to monitor and implement the investment strategy and are unable to address underachieving fund managers.	8	3	24	TOLERATE - 1) Tri-Borough Director of Treasury & Pensions is a member of the officer Investment Advisory Committee which gives the Fund influence over the work of the London CIV. 2) LCIV have recently appointed a new permanent CEO and CIO who will be key in shaping the pool's investment strategy	2	16
Operational	Procurement processes may be challenged if seen to be non-compliant with OJEU rules. Poor specifications lead to dispute. Unsuccessful fund managers may seek compensation following non-compliant process	7	2	14	TOLERATE - Ensure that assessment criteria remain robust and that full feedback is given at all stages of the procurement process.	2	14
Funding	Ill health costs may exceed "budget" allocations made by the actuary resulting in higher than expected liabilities particularly for smaller employers.	7	2	14	TOLERATE - Review "budgets" at each triennial valuation and challenge actuary as required. Charge capital cost of ill health retirements to admitted bodies at the time of occurring. Occupational health services provided by the Council and other large employers to address potential ill health issues early.	2	14
Funding	Impact of increases to employer contributions following the actuarial valuation	13	2	26	TREAT- 1) Officers to consult and engage with employer organisations in conjunction with the actuary. 2) Actuary will assist where appropriate with stabilisation and phasing in processes.	1	13
Governance	Changes to LGPS Regulations	6	3	18	TREAT - 1) Fundamental change to LGPS Regulations implemented from 1 April 2014 (change from final salary to CARE scheme). 2) Future impacts on employer contributions and cash flows will considered during the 2016 actuarial valuation process. 3) Fund will respond to ongoing consultation processes. 4) Impact of LGPS (Management of Funds) Regulations 2016 to be monitored. Impact of Regulations 8 (compulsory pooling) to be monitored.	2	12

Governance	Failure to make difficult decisions inhibits effective Fund management	12	2	24	TREAT-1) Officers ensure that governance process encourages decision making on objective empirical evidence rather than emotion. Officers ensure that the basis of decision making is grounded in the Investment Strategy Statement (ISS), Funding Strategy Statement (/FSS), Governance policy statement and Committee Terms of Reference and that appropriate advice from experts is sought	1	12
Investment	Failure to keep up with the pace of change regarding economic, policy, market and technology trends relating to climate change	6	3	18	TREAT- 1) Officers regularly receive updates on the latest ESG policy developments from the fund managers. 2) The Pensions Fund is a member of the Local Authority Pension Fund Forum which engages with companies on a variety of ESG issues including climate change	2	12
Governance	Failure by the audit committee to perform its governance, assurance and risk management duties	6	3	18	TREAT- 1) Audit Committee performs a statutory requirement for the Pension Fund with the Pension Sub-Committee being a sub-committee of the audit committee. 2) Audit Committee meets regularly where governance issues are regularly tabled.	2	12
Governance	Implementation of proposed changes to the LGPS (pooling) does not conform to plan or cannot be achieved within laid down timescales	6	3	18	TREAT- 1) Officers consult and engage with MHCLG, LGPS Scheme Advisory Board, advisors, consultants, peers, various seminars and conferences. 2) Officers engage in early planning for implementation against agreed deadlines.	2	12
Funding	There is insufficient cash available in the Fund to meet pension payments leading to investment assets being sold at sub-optimal prices to meet pension payments.	11	2	22	TREAT - 1) Cashflow forecast maintained and monitored. Cashflow position reported to sub-committee quarterly. 2) The Fund receives quarterly distributions from some of its investments to help meet its pensions obligations.	1	11
Funding	Mismatching of assets and liabilities, inappropriate long-term asset allocation or investment strategy, mistiming of investment strategy	11	2	22	TREAT- 1) Active investment strategy and asset allocation monitoring from Pension Fund Committee, officers and consultants. 2) Investment strategy review is currently underway with an approved switch from equities to fixed income. 3) Setting of Fund specific benchmark relevant to the current position of fund liabilities. 4) Fund manager targets set and based on market benchmarks or absolute return measures. Overall investment benchmark and out-performance target is fund specific.	1	11
Governance	Failure to comply with legislation leads to ultra vires actions resulting in financial loss and/or reputational damage.	11	2	22	TREAT - Officers maintain knowledge of legal framework for routine decisions. Eversheds retained for consultation on non-routine matters.	1	11

Financial	Financial loss of cash investments from fraudulent activity	11	2	22	TREAT - 1) Policies and procedures are in place which are regularly reviewed to ensure risk of investment loss is minimised. Strong governance arrangements and internal control are in place in respect of the Pension Fund. Internal Audit assist in the implementation of strong internal controls. Fund Managers must provide annual SSAE16 and ISAE3402 or similar documentation (statement of internal controls).	1	11
Operational	Failure to hold personal data securely in breach of General Data Protection Regulation (GDPR) legislation.	11	2	22	TREAT - 1) Data encryption technology is in place which allow the secure transmission of data to external service providers. 2) Phasing out of holding records via paper files. 3) Pensions Admin (Surrey County Council) manual records are locked daily in a secure safe. 4) WCC IT data security policy adhered to.	1	11
Funding	Failure of an admitted or scheduled body leads to unpaid liabilities being left in the Fund to be met by others.	11	2	22	TREAT - Transferee admission bodies required to have bonds in place at time of signing the admission agreement. Regular monitoring of employers and follow up of expiring bonds.	1	11
Operational	Inaccurate information in public domain leads to damage to reputation and loss of confidence	5	3	15	TREAT – 1) Ensure that all requests for information (Freedom of Information, member and public questions at Council, etc) are managed appropriately and that Part 2 Exempt items remain so. 2) Maintain constructive relationships with employer bodies to ensure that news is well managed.	2	10
Governance	Inadequate, inappropriate or incomplete investment or actuarial advice is actioned leading to a financial loss or breach of legislation.	10	2	20	TREAT - At time of appointment ensure advisers have appropriate professional qualifications and quality assurance procedures in place. Committee and officers scrutinise, and challenge advice provided.	1	10
Operational	Financial failure of third-party supplier results in service impairment and financial loss	10	2	20	TREAT - 1) Performance of third parties (other than fund managers) regularly monitored. 2) Regular meetings and conversations with global custodian (Northern Trust) take place. 3) Actuarial and investment consultancies are provided by two different providers.	1	10
Governance	Change in membership of Pension Fund Committee leads to dilution of member knowledge and understanding	5	4	20	TREAT - 1) Succession planning process in place. 2) Ongoing training of Pension Fund Committee members. 3) Pension Fund Committee new member induction programme. 4) Training to be based on the requirements of CIPFA Knowledge and Skills Framework under designated officer.	2	10
Investment	Failure of global custodian or counterparty.	10	10	20	TREAT - At time of appointment, ensure assets are separately registered and segregated by owner. Review of internal control reports on an annual basis. Credit rating kept under review.	1	10

Operational	Financial failure of a fund manager leads to value reduction, increased costs and impairment	10	2	20	TREAT - 1) Fund is reliant upon current adequate contract management activity. 2) Fund is reliant upon alternative suppliers at similar price being found promptly. 3) Fund is reliant on LGIM as transition manager. 4) Fund has the services of the London Collective Investment Vehicle (LCIV).	1	10
Investment	Global investment markets fail to perform in line with expectations leading to deterioration in funding levels and increased contribution requirements from employers.	10	2	20	TREAT - 1) Proportion of total asset allocation made up of equities, bonds, property funds and fixed income, limiting exposure to one asset category. 2) The investment strategy is continuously monitored and periodically reviewed to ensure optimal risk asset allocation. 3) Actuarial valuation and strategy review take place every three years post the actuarial valuation. 4) IAS19 data is received annually and provides an early warning of any potential problems. 5) The actuarial assumption regarding asset outperformance is regarded as achievable over the long term when compared with historical data.	1	10
Governance	Officers do not have appropriate skills and knowledge to perform their roles resulting in the service not being provided in line with best practice and legal requirements. Succession planning is not in place leading to reduction of knowledge when an officer leaves	10	2	20	TREAT - Person specifications are used at recruitment to appoint officers with relevant skills and experience. Training plans are in place for all officers as part of the performance appraisal arrangements. Shared service nature of the pensions team provides resilience and sharing of knowledge.	1	10
Governance	Failure to comply with legislative requirements e.g. ISS, FSS, Governance Policy, Freedom of Information requests	10	2	20	TREAT - 1) Publication of all documents on external website. 2) Managers expected to comply with ISS and investment manager agreements. 3) Local Pension Board is an independent scrutiny and assistance function. 4) Annual audit reviews.	1	10
Funding	Scheme matures more quickly than expected due to public sector spending cuts, resulting in contributions reducing and pension payments increasing.	9	2	18	TREAT - Review maturity of scheme at each triennial valuation. Deficit contributions specified as lump sums, rather than percentage of payroll to maintain monetary value of contributions. Cashflow position monitored monthly.	1	9
Governance	Committee members do not have appropriate skills or knowledge to discharge their responsibility leading to inappropriate decisions.	9	2	18	TREAT - External professional advice is sought where required. Knowledge and skills policy in place (subject to Committee Approval)	1	9

Operational	Insufficient attention paid to environmental, social and governance (ESG) issues, leading to reputational damage.	9	2	18	TREAT-1) Review ISS in relation to published best practice (e.g. Stewardship Code) 2) The Fund currently holds investments in the MSCI Low Carbon and Aviva Renewables Infrastructure Fund ISS. 3) The Fund is a member of the Local Authority Pension Fund Forum (LAPFF), which raises awareness of ESG issues and facilitates engagement with fund managers and corporate company directors.	1	9
Financial	Inaccurate cash flow forecasts or drawdown payments lead to shortfalls on cash levels and borrowing becomes necessary to ensure that funds are available	9	2	18	TREAT - 1) Borrowing limits with banks are set at levels that are more than adequate should cash be required at short notice. 2) Cashflow analysis of pension fund undertaken at regular intervals.	1	9
Regulation	Loss of flexibility to engage with Fund Managers that the fund has not 'opted up' regarding new products, resulting in reduced knowledge about investment opportunities that may benefit the fund. (The Fund is a retail client to counterparties unless opted up)	9	2	18	TREAT - More reliance on investment advisor to keep Officers and Committee updated. Officers are considering other financial institution outside of the current mandates to 'opt up' with. Maintaining up to date information about the fund on relevant platforms. Fund can opt up with prospective clients.	1	9
Governance	Failure to comply with recommendations from the Local Pension Board, resulting in the matter being escalated to the scheme advisory board and/or the pensions regulator	9	2	18	TREAT - 1) Ensure that an cooperative, effective and transparent dialogue exists between the Pension Fund Committee and Local Pension Board.	1	9
Regulation	Loss of 'Elective Professional Status' with any or all of existing Fund managers and counterparties resulting in reclassification of fund from professional to retail client status impacting Fund's investment options.	8	2	16	TREAT - Keep quantitative and qualitative requirements under review to ensure that they continue to meet the requirements. There is a training programme and log in place to ensure knowledge and understanding is kept up to date. Existing and new Officer appointments subject to requirements for professional qualifications and CPD.	1	8
Funding	The level of inflation and interest rates assumed in the valuation may be inaccurate leading to higher than expected liabilities.	7	2	14	TREAT - Review at each triennial valuation and challenge actuary as required. Growth assets and inflation linked assets in the portfolio should rise as inflation rises.	1	7

Regulation	Pensions legislation or regulation changes resulting in an increase in the cost of the scheme or increased administration.	7	2	14	TREAT - Maintain links with central government and national bodies to keep abreast of national issues. Respond to all consultations and lobby as appropriate to ensure consequences of changes to legislation are understood.	1	7

London Borough of Hammersmith & Fulham Pension Fund Risk Register – Administration Risk							
Risk Group	Risk Description	Impact Total	Likelihood	Total Risk Score	Mitigation Actions	Revised Likelihood	Net Risk Score
Admin	Structural changes in an employer's membership or an employer fully/partially closing the scheme. Employer bodies transferring out of the pension fund or employer bodies closing to new membership. An employer ceases to exist with insufficient funding or adequacy of bond placement.	9	3	**27**	TREAT 1) Administering Authority actively monitors prospective changes in membership. 2) Maintain knowledge of employer future plans. 3) Contributions rates and deficit recovery periods set to reflect the strength of the employer covenant. 4) Periodic reviews of the covenant strength of employers are undertaken and indemnity applied where appropriate. 5) Risk categorisation of employers planned to be part of 2019 actuarial valuation. 6) Monitoring of gilt yields for assessment of pensions deficit on a termination basis.	2	**18**
Admin	Concentration of knowledge in a small number of officers and risk of departure of key staff.	7	3	**21**	TREAT 1) Practice notes in place. 2) Development of team members and succession planning improvements to be implemented. 3) Officers and members of the Pension Fund Committee will be mindful of the proposed CIPFA Knowledge and Skills Framework when setting objectives and establishing training needs.	2	**14**
Admin	Incorrect data due to employer error, user error or historic error leads to service disruption, inefficiency and conservative actuarial assumptions.	11	2	**22**	TREAT 1) Update and enforce admin strategy to assure employer reporting compliance. 2) Implementation and monitoring of a Data Improvement Plan as part of the Service Specification between the Fund and Orbis. TOLERATE 1) Northern Trust provides 3rd party validation of performance and valuation data. Admin team and members are able to interrogate data to ensure accuracy.	1	**11**
Admin	Loss of funds through fraud or misappropriation leading to negative impact on reputation of the Fund as well as financial loss.	10	2	**20**	TREAT 1) Third parties regulated by the FCA and separation of duties and independent reconciliation processes are in place. 2) Review of third-party internal control reports. 3) Regular reconciliations of pensions payments undertaken by Pension Finance Team. 4) Periodic internal audits of Pensions Finance and HR Teams.	1	**10**

Admin	Failure of fund manager or other service provider without notice resulting in a period without the service being provided or an alternative needing to be quickly identified and put in place.	9	2	**18**	TREAT 1) Contract monitoring in place with all providers. 2) Procurement team send alerts whenever credit scoring for any provider changes for follow up action.	1	**9**
Admin	Non-compliance with regulation changes relating to the pension scheme or data protection leads to fines, penalties and damage to reputation.	8	2	**16**	TREAT 1) The Fund has generally good internal controls with regard to the management of the Fund. These controls are assessed on an annual basis by internal and external audit as well as council officers. 2) Through strong governance arrangements and the active reporting of issues, the Fund will seek to report all breaches as soon as they occur in order to allow mitigating actions to take place to limit the impact of any breaches.	1	**8**
Admin	Failure of financial system leading to lump sum payments to scheme members and supplier payments not being made and Fund accounting not being possible.	8	2	**16**	TREAT 1) Contract in place with HCC to provide service, enabling smooth processing of supplier payments. 2) Process in place for Surrey CC to generate lump sum payments to members as they are due. 3) Officers undertaking additional testing and reconciliation work to verify accounting transactions.	1	**8**
Admin	Inability to respond to a significant event leads to prolonged service disruption and damage to reputation.	8	2	**16**	TREAT 1) Disaster recovery plan in place as part of the Service Specification between the Fund and Surrey County Council 2) Ensure system security and data security is in place 3) Business continuity plans regularly reviewed, communicated and tested 4) Internal control mechanisms ensure safe custody and security of LGPS assets. 5) Gain assurance from the Fund's custodian, Northern Trust, regarding their cyber security compliance.	1	**8**
Admin	Failure of pension payroll system resulting in pensioners not being paid in a timely manner.	7	2	**14**	TREAT 1) In the event of a pension payroll failure, we would consider submitting the previous months BACS file to pay pensioners a second time if a file could not be recovered by the pension administrators and our software suppliers.	1	**7**
Admin	Failure to pay pension benefits accurately leading to under or over payments.	6	2	**12**	TREAT 1) There are occasional circumstances where under/over payments are identified. Where underpayments occur, arrears are paid as soon as possible, usually in the next monthly pension payment. Where an overpayment occurs, the member is contacted, and the pension corrected in the next month. Repayment is requested and sometimes we collect this over a number of months.	1	**6**

Admin	Bank reconciliations no longer carried out by BT. Income processing from the bank has been brought in house. HCC have agreed a new process of allocating income on to the ledger, however a steep learning curve still exists leading to misallocations and delay in the clearance of the suspense account.	6	2	**12**	TREAT 1) Pensions team to continue to work closely with staff at HCC to smooth over any teething problems relating to the newly agreed process	1	**6**
Admin	Administrators do not have enough staff or skills to manage the service leading to poor performance and complaints.	6	2	**12**	TOLERATE 1) Surrey CC administers pensions for Surrey, East Sussex, LB Hillingdon and the Tri-Borough. Service has been excellent since this change was made.	1	**6**
Admin	Unstructured training leads to under developed workforce resulting in inefficiency.	6	2	**12**	TREAT 1) Implementation and monitoring of a Staff Training and Competency Plan as part of the Service Specification between the Fund and Surrey County Council.	1	**6**
Admin	Failure to identify GMP liability leads to ongoing costs for the pension fund.	6	2	**12**	TREAT 1) GMP to be identified as a Project as part of the Service Specification between the Fund and Surrey County Council.	1	**6**
Admin	Failure of pension administration system resulting in loss of records and incorrect pension benefits being paid or delays to payment.	3	3	**9**	TREAT 1) Pension administration records are stored on the Surrey CC servers who have a disaster recovery system in place and records should be restored within 24 hours of any issue, All files are backed up daily.	2	**6**
Admin	BT contract wind down could lead to problems for retirements in 18/19 where data is on two different systems. All returns must be completed prior to BT contract ceasing. The move to Hampshire CC due in December 2018 and ensuring that key working practices continue such as the pension interface will be a Key to reduce risks to members.	5	2	**10**	TREAT 1) The Bi-borough HR team are working with HCC and BT to ensure service transfer is smooth as possible. 2) 2018/19 LGPS files to be checked by the Bi-borough in June 2019.	1	**5**
Admin	Lack of guidance and process notes leads to inefficiency and errors.	5	2	**10**	TREAT 1) The team will continue to ensure process notes are updated and circulated amongst colleagues in the Pension Fund and Administration teams.	1	**5**

Admin	Lack of productivity leads to impaired performance.	5	2	**10**	TREAT 1) Regular appraisals with focused objectives for pension fund and admin staff.	1	**5**
Admin	Rise in ill health retirements impact employer organisations.	5	2	**10**	TREAT 1) Engage with actuary re assumptions in contribution rates.	1	**5**
Admin	Rise in discretionary ill-health retirements claims adversely affecting self-insurance costs.	5	2	**10**	TREAT 1) Pension Fund monitors ill health retirement awards which contradict IRMP recommendations.	1	**5**
Admin	Poor reconciliation process leads to incorrect contributions.	4	2	**8**	TREAT 1) Ensure reconciliation process notes are understood by Pension Fund team. 2) Ensure that the Pension Fund team is adequately resourced to manage the reconciliation process.	1	**4**

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London Borough of Hammersmith & Fulham PENSIONS SUB-COMMITTEE 9 July 2019	
UK Equity Mandate Review	
Report of the Strategic Director, Finance and Governance	
Open Report	
Classification - For Decision **Key Decision: No**	
Wards Affected: None	
Accountable Director: Phil Triggs, Director of Treasury and Pensions	
Report Author: Matt Hopson, Strategic Investment Manager	**Contact Details:** Tel: 0207 641 4126 E-mail: mhopson@westminster.gov.uk

1. EXECUTIVE SUMMARY

1.1 This paper summarises

a. The current allocation to UK Equities and the risks and benefits of holding this allocation.

b. The current performance of the investment manager currently operating this mandate for the Hammersmith and Fulham Pension Fund.

2. RECOMMENDATIONS

2.1 The Sub-Committee is requested to note the current performance of Majedie.

2.2 The Sub-Committee is requested to approve the removal of a long-term UK equities allocation for the Fund as part of the triennial valuation investment strategy.

3. UK EQUITIES MANDATE

3.1 Currently, the Pension Fund has a 15% allocation to UK Equities. As at 31 March 2019, the value of the allocation was £125m, an underweight of 3%.

3.2 The benefits of holding this allocation are:

- Significantly reduced currency risk as the underlying assets are valued in Sterling.
- UK equity markets historically have higher than average dividend yields which could improve the Fund's cash flow.

3.3 The risks of holding this allocation are:

- A larger exposure to the UK Equities market, which is only 6% of the global market, is effectively a bet that the UK will outperform global markets on a currency adjusted basis.
- Narrowing of the investment universe increases idiosyncratic equity investment risks with fewer diversifying companies.
- Specific risks surrounding economic uncertainty that are unique to the UK, such as the UK's pending exit from the European Union.
- The UK Equities market is over-concentrated in a few sectors, mainly energy, mining and financials, reducing sector diversification benefits.

3.4 UK Equities markets have performed very poorly over the last twenty years when compared with global equities markets. Pension funds across the LGPS that have reduced UK equity allocations have outperformed. It should be considered whether maintaining an allocation to UK Equities markets specifically is still relevant in the equities asset allocation.

4 MAJEDIE ASSET MANAGEMENT

4.1 Majedie Asset Management has run the UK Equities mandate since 2005, outperforming the market by around 2.6% on a since inception basis (annualised). Appendix 1, prepared by Deloitte, discusses their current performance in detail.

4.2 The main points to note from the report are:

- Majedie has experienced poor performance in the last two years, with significant underperformance in 2017 when compared with the FTSE All Share Index.
- Majedie has suffered particularly from a small part of its portfolio that has significantly underperformed.
- Long term performance does however still remain positive.

- The portfolio invests primarily in stocks with high percentages of earnings generated overseas, providing less currency risk diversification.

- There are no long term concerns with Majedie Asset Management in continuing to manage the mandate if the Committee wishes to maintain an allocation to UK Equities.

5 CONCLUSION

5.1 On balance, the Committee is recommended to consider an alternative asset class within Equities to reduce the risks of overexposure to the UK, which will be decided as part of the new investment strategy aligned to the 2019 triennial valuation.

6 CONSULTATION

6.1 Not applicable

7 EQUALITY IMPLICATIONS

7.1 Not applicable

8 LEGAL IMPLICATIONS

8.1 None

9 FINANCE AND RESOURCES IMPLICATIONS

9.1 Finance risks are outlined within the report.

10 IMPLICATIONS FOR BUSINESS

10.1 Not applicable

11 RISK MANAGEMENT

11.1 Risks are outlined within the report.

12 PROCUREMENT IMPLICATIONS

12.1 None

13 IT STRATEGY IMPLICATIONS

13.1 None

LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
1.	None		

LIST OF APPENDICES:

(EXEMPT) Appendix 1: Deloitte Majedie report

London Borough of Hammersmith & Fulham **PENSIONS SUB-COMMITTEE** **9 July 2019**	
CASH MANAGER UPDATE	
Report of the Strategic Director of Finance & Governance	
Open Report	
Classification: For Information **Key Decision: No**	
Wards Affected: None	
Accountable Director: Phil Triggs, Director of Treasury and Pensions	
Report Author: Tim Mpofu, Pension Fund Manager	**Contact Details:** Tel: 0207 641 6308 E-mail: tmpofu@westminster.gov.uk

1. EXECUTIVE SUMMARY

1.1. This paper provides the Pension Fund Sub-Committee with a summary of the Pension Fund's current cash managers and future recommendations for the effective management of cash for the fund.

2. RECOMMENDATIONS

2.1. The Pension Fund Sub-Committee is recommended to note the key details of each of the fund's existing cash managers.

2.2. The Pension Fund Sub-Committee is requested to approve the transfer of the cash in the LGIM Sterling Liquidity Fund into the Northern Trust custody account and use Northern Trust as the main account for any future asset transitions.

3. CURRENT CASH MANAGERS

3.1. The Pension Fund currently manages its cash holdings using three separate accounts.

3.2. The Nat West bank account is the Fund's main account for day-to-day transactions which include receiving contributions and paying out pension payments to scheme members. As this account pays a nominal interest rate of 0.15%, surplus funds are usually swept into the custody account and the balance is monitored regularly to ensure it does not get overdrawn.

3.3. Most of the fund manager distributions are paid into the Fund's custody account. These are largely repayments from the private equities and private multi-asset credit funds which are now at their liquidation stage.

3.4. The Fund also has a money market fund which is run by Legal & General Investment Management. This fund is normally used as a transition vehicle for strategic rebalancing of the Fund's overall investment portfolio.

4. PROPOSAL

4.1. The table below compares the details between the Northern Trust custody cash account and the LGIM Sterling Liquidity Fund

	Northern Trust	**LGIM**
Interest Rate	0.60%	0.70%
Fees	0.00%	0.08%
Investment Dealing Cut-off	12:30 on the dealing date	18:00 on the Business Day before the dealing date
Settlement Details	Not applicable	Two business days after the dealing date

4.2. Both cash managers offer high security and the likelihood of them ceasing operations suddenly is very low.

4.3. The Sterling Liquidity fund pays a better gross interest rate on average. However, taking fees into account the difference in the net interest rate is marginal.

4.4. Northern Trust offers greater liquidity of the two. This is especially important for emergency payments and short notice capital calls. The two-day dealing date offered by the Sterling Liquidity Fund runs the risk of the money not being ready when it is needed.

4.5. The Sub-Committee is therefore recommended to approve the transfer of all the funds in the Sterling Liquidity fund and use Northern Trust as the main account for transitions going forward.

5. FINANCIAL IMPLICATIONS

5.1. Information only.

6. IMPLICATIONS FOR BUSINESS

6.1. None.

7. BACKGROUND PAPERS USED IN PREPARING THIS REPORT

7.1. None.