

Pension Board AGENDA

DATE: Monday 2 November 2015

TIME: 6.30 pm

VENUE: Committee Rooms 1 & 2,
Harrow Civic Centre

MEMBERSHIP (Quorum 3)

Chair: Mr R Harbord

Board Members:

| | |
|------------------------------|---|
| Councillor Kiran Ramchandani | - Employer Representative - London Borough of Harrow |
| Gerald Balabanoff (VC) | - Scheme Members' Representative - Pensioners |
| Sudhi Pathak | - Employer Representative - Scheduled and Admitted Bodies |
| John Royle | - Scheme Members' Representative - Active Members |

Contact: Manize Talukdar, Democratic & Electoral Services Officer
Tel: 020 8424 1883 Email: manize.talukdar@harrow.gov.uk

AGENDA - PART I

1. ATTENDANCE BY RESERVE MEMBERS

To note the attendance at this meeting of any duly appointed Reserve Members.

Reserve Members may attend meetings:-

- (i) to take the place of an ordinary Member for whom they are a reserve;
- (ii) where the ordinary Member will be absent for the whole of the meeting; and
- (iii) the meeting notes at the start of the meeting at the item 'Reserves' that the Reserve Member is or will be attending as a reserve;
- (iv) if a Reserve Member whose intention to attend has been noted arrives after the commencement of the meeting, then that Reserve Member can only act as a Member from the start of the next item of business on the agenda after his/her arrival.

2. DECLARATIONS OF INTEREST

To receive declarations of disclosable pecuniary or non pecuniary interests, arising from business to be transacted at this meeting, from:

- (a) all Members of the Committee;
- (b) all other Members present.

3. MINUTES (Pages 5 - 12)

That the minutes of the meeting held on 25 June 2015 be taken as read and signed as a correct record.

4. PUBLIC QUESTIONS *

To receive any public questions received in accordance with Committee Procedure Rule 17.

Questions will be asked in the order notice of them was received and there be a time limit of 15 minutes.

[The deadline for receipt of public questions is 3.00 pm, 28 October 2015. Questions should be sent to publicquestions@harrow.gov.uk

No person may submit more than one question].

5. PETITIONS

To receive petitions (if any) submitted by members of the public/Councillors under the provisions of Committee Procedure Rule 15 (Part 4B of the Constitution).

6. DEPUTATIONS

To receive deputations (if any) under the provisions of Committee Procedure Rule 16 (Part 4B) of the Constitution.

7. CODE OF CONDUCT (Pages 13 - 28)

Report of the Director of Finance.

8. ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2015 (Pages 29 - 210)

Report of the Director of Finance.

9. INVESTMENT AND MANAGEMENT EXPENSES 2014-15 (Pages 211 - 216)

Report of the Director of Finance.

10. STATEMENT OF INVESTMENT PRINCIPLES (Pages 217 - 230)

Report of the Director of Finance.

11. PENSION FUND COMMITTEE - 1 JULY 2015 (Pages 231 - 256)

Report of the Director of Finance.

12. PENSION FUND COMMITTEE - 8 SEPTEMBER 2015 (Pages 257 - 264)

Report of the Director of Finance.

13. BENCHMARKING EXERCISE AND KEY PERFORMANCE INDICATORS (Pages 265 - 278)

Report of the Director of Finance.

14. ANY OTHER BUSINESS

Which the Chairman has decided is urgent and cannot otherwise be dealt with.

AGENDA - PART II - NIL

*** DATA PROTECTION ACT NOTICE**

The Council will audio record item 4 (Public Questions) and will place the audio recording on the Council's website, which will be accessible to all.

[**Note:** The questions and answers will not be reproduced in the minutes.]

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PENSION BOARD MINUTES

25 JUNE 2015

| | | |
|-----------------------|--------------------------------|--|
| Chair: | * Mr R Harbord | Independent Member |
| Board Members: | * Councillor Kiran Ramchandani | Employer Representative - London Borough of Harrow Scheme Members' |
| | * Gerald Balabanoff | Representative - Pensioners |
| | * Sudhi Pathak | Employer Representative - Scheduled and Admitted Bodies |
| | * John Royle | Scheme Members' Representative - Active Members |

* Denotes Member present

1. Appointment of Chair

RESOLVED: That Mr Richard Harbord be appointed as Chair of the Board for the remainder of the 2015/16 Municipal Year.

2. Appointment of Vice Chair

RESOLVED: That Mr Gerald Balabanoff be appointed as Vice-Chair of the Board for the remainder of the 2015/16 Municipal Year.

3. Declarations of Interest

RESOLVED: To note that no interests were declared.

4. Public Questions, Petitions and Deputations

RESOLVED: To note that no public questions were put or petitions and deputations received.

RESOLVED ITEMS

5. Background to Board

The Board received a report which provided information on the Shadow Advisory Board's publication titled 'Guidance on the creation and operation of Local Pension Boards in England and Wales'.

The Treasury and Pension Fund Manager advised the Board that the guidance was a key document and that there were several important points arising from it. These included:

- the Board had been established as a result of the Public Service Pensions Act 2013;
- a Pensions Board had to be established by the Council by the 1 April 2015 and this had been achieved;
- there were rules concerning the structure and membership of the Board and how it was to be constituted. The composition and membership of the Board that the Council had adopted was in line with the model adopted by the majority of Local Authorities nationally;
- there was information on the terms of reference of the Board and the Code of Conduct to be adopted by its Members;
- there was information on the Board's relationship with the Council's Pension Fund Committee;
- the Board was entitled to receive resources and funding for its activities. For example the Board was able to draw upon the advice of Council officers.

The Treasury and Pension Fund Manager concluded by explaining that all of the themes referred to would be elaborated upon in the subsequent reports on the agenda.

RESOLVED: That the report be noted.

6. Terms of Reference

The Board received a report which set out the Board's Terms of Reference agreed by the Council. The Treasury and Pension Fund Manager explained that these were being presented to the Board for comments and if there were any suggested amendments these could be re-submitted to the Council for its consideration.

During the discussion on this item Members of the Board made a number of comments as follows:

- a typo on page 12 was required to replace 'or' with 'for';
- an amendment could be made to read that the Board shall meet at least twice a year;
- it was important for continuity to be an important factor in the membership of the Board. The Board's operation was a new concept and if there was a new membership after a couple of years this could reduce the knowledge and experience built up. This was an issue that the Chair and Treasury and Pension Fund Manager would consider in due course.

RESOLVED: That the report be noted.

7. Role of Board

The Board received a report which set out the views of the then Shadow Advisory Board on the role of a Local Pension Board and invited the Board's comments.

The Treasury and Pension Fund Manager advised that in the Terms of Reference for the Board, as discussed in the previous agenda item, the description of Role of the Board was generic in nature. The Shadow Advisory Board expressed their views in the guidance titled 'Guidance on the Creation and Operation of Local Pension Boards in England and Wales' which provided more specific duties for the Board. The Board may consider this to be more relevant for their remit and Terms of Reference.

During this item, Members of the Board made a number of comments as follows:

- the description of the role was generic and the specific tasks referred to by the Shadow Board were not apparent from it;
- it may be wise to wait and see how the terms of reference operated in practice before amending them. This was a new concept and it was important not to exclude any activities by making the Terms of Reference too specific;
- it would be better that the views of the Shadow Advisory Board acted as an advisory document alongside the Terms of Reference;
- further formal training was required by Members of the Board before any further comment could be made.

The Chair commented that the consensus was that this was an issue to investigate at a later date. This could be reviewed in 12 months' time.

RESOLVED: That the report be noted.

8. Pension Fund Committee

The Board received a report which provided information on the Council's Pension Fund Committee. The Treasury and Pension Fund Manager advised the Board that he had attached previous agendas and reports of the last two Pension Fund Committee meetings for reference. There were a number of different items the Pension Fund Committee considered including the Statement of Investment Principles and the performance of Pension Fund managers.

During this item, Members of the Board made a number of comments as follows:

- it was important that the Board received the exempt papers provided to the Pension Fund Committee to enable proper scrutiny;
- it was important that the Board were kept fully aware of the activities of the Pension Fund Committee;
- the items presented to the Board should be similar to that presented to the Pension Fund Committee;
- Pension Board Members should receive copies of the Pension Fund Committee agenda and reports once published;
- it was important to have a good relationship between the Board and the Pension Fund Committee to enable better networking;
- it would be helpful if Board Members shared their contact details in case issues required further discussion other than at meetings;
- it would be considered whether further meetings of the Board within a Municipal Year would be required;
- it would be helpful if the Board produced an article about its role and work in the booklet which usually accompanied the P60s sent to pensioners. It may also be helpful if an Annual Report from the Board was submitted to the Full Council.

Upon a request by a Member of the Board, copies of the Pension Fund Risk Register was circulated to all Members.

RESOLVED: That the report be noted.

9. Code of Conduct

The Board received a report advising of the Code of Conduct for Councillors and asking that Board Members agree to abide by it.

Members of the Board made a number of comments during this item as follows:

- the legal advice received explaining that Board Members should abide by the Councillors Code of Conduct was required before any formal agreement. This did not seem to accord with the information relating to the establishment of Pension Boards;
- practice on this issue seemed to vary nationally and this had not been a requirement for other members on different Pension Boards.

The Treasury and Pension Fund Manager explained that his legal advice was that the Board were co-optees and that the Code of Conduct should apply.

The Chair asked that the issues raised be investigated and reported back to the Board before any further action.

RESOLVED: That the report be noted.

10. Knowledge and Understanding of Local Government Pension Scheme

The Board received a report which set the requirements in respect of knowledge and understanding of the Local Government Pension Scheme. The Treasury and Pension Fund Manager explained that this would involve formal training for all Members of the Board. The Council had held discussions with Aon Hewitt and Eversheds. It was proposed that training be held for either half or a full day.

During the discussion on this item Members made a number of comments as follows:

- there was a statutory duty for Members of the Board to receive training. Anything longer than an initial day's worth of training would be excessive;
- it was important for the Board to agree upon areas which they felt that they required training on so that the training provided was tailored to its needs. Any suggestions should be made to the Treasury and Pension Fund Manager
- training was required on the role of Board Members and how they could identify issues in their role;
- one area of training could be learning about the discretion of Chief Officers awarding flexible retirement to employees of the Council and whether these were being applied consistently. The Treasury and Pension Fund Manager advised that a report could be provided on this issue at the next Board meeting;

- training was a continuous process and it would be helpful if at the start of each Board meeting, 30 minutes or so was allocated to providing Members of the Board with any updates relevant to it.

RESOLVED: That the report be noted.

11. Work Programme for 2015/16

The Board received a document which set out issues that the Board may wish to consider as part of its Work Programme for the remainder of 2015/16.

The Treasury and Pension Fund Manager reported that the report contained a number of suggestions for the Board to include in its Work Programme.

During the item Members of the Board made a number of comments as follows:

- the Board could meet as often as required;
- if Board Members felt that additional meetings were required they could contact the Chair to request this;
- with more experience, Board Members would be able to identify what areas require further investigation and consideration;
- a starting point in terms of the work programme was required;
- the work programme could be looked at informally when Board Members had their training session.

RESOLVED: That the work programme, as contained in the report, be agreed for the remainder of 2015/16.

12. Key Documents

The Board received a report which contained key documents which the Board may wish to comment on at future meetings. The Treasury and Pension Fund Manager explained that the Governance Compliance Statement, the Statement of Investment Principles and Funding Strategy Statement were three of the most important documents attached to the Council's accounts. Pension Board Members, would as a matter of course, receive these documents in the future when considering the draft accounts. It was accepted that the Governance Compliance Statement was difficult to follow and this would be considered for the future.

RESOLVED: That the report be noted.

13. Any Other Business

The Treasury and Pension Fund Manager confirmed that the issue of indemnifying Board Members for their decisions would be clarified alongside the issue of clarifying the position for Board Members to have a Code of Conduct.

The Treasury and Pension Fund Manager also clarified that any employees or Councillors would not be paid the allowance which was provided to external Members of the Board. As the Board had raised this issue it would be considered as part of the Terms of Reference item.

RESOLVED: That the item be noted.

14. Date of Next Meeting

The Treasury and Pension Fund Manager advised that it may be wise to hold the next meeting of the Board in October 2015. He would liaise with Members of the Board and confirm a date and time.

RESOLVED: That the item be noted.

(Note: The meeting, having commenced at 3.30 pm, closed at 4.38 pm).

(Signed) RICHARD HARBORD
Chair

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REPORT FOR: Pension Board

Date of Meeting: 2 November 2015

Subject: Code of Conduct

Responsible Officer: Dawn Calvert, Director of Finance

Exempt: No

Enclosures: Harrow Council – Code of Conduct for Councillors

Section 1

Summary

As a result of their decision on 25 June 2015 the Members of the Board are advised of the further advice provided by the Council's legal adviser and will be asked to confirm that, as Members of the Board, they will abide by the Council's Code of Conduct for Councillors

For information

Section 2 – Report

1. At their meeting on 25 June 2015 the Board were advised that their Terms of Reference state that all Members of the Board are expected to act in accordance with the Council's Code of Conduct for Councillors.
2. A copy of the Code is attached.
3. As minuted, the decision of the Board was:

The Board received a report advising of the Code of Conduct for Councillors and asking that Board Members agree to abide by it.

Members of the Board made a number of comments during this item as follows:

- *the legal advice received explaining that Board Members should abide by the Councillors Code of Conduct was required before any formal agreement. This did not seem to accord with the information relating to the establishment of Pension Boards;*
- *practice on this issue seemed to vary nationally and this had not been a requirement for other members on different Pension Boards.*

The Treasury and Pension Fund Manager explained that his legal advice was that the Board were co-optees and that the Code of Conduct should apply.

The Chair asked that the issues raised be investigated and reported back to the Board before any further action.

4. The Council's legal adviser HB Public Law and the Monitoring Officer have been further consulted and have advised that:

The Code is clear that it applies to co-opted members and appointed members

5. Board Members are therefore asked to confirm that they will abide by the Council's Code of Conduct for Councillors.

Section 3 - Statutory Officer Clearance

Name Dawn Calvert



Director of Finance
(Interim)

Date: 22 October 2015

Section 4 - Contact Details

Contact: Ian Talbot, Treasury and Pension Fund Manager
0208 424 1450

Background Papers - None

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HARROW COUNCIL

A. CODE OF CONDUCT FOR COUNCILLORS

Background

The Localism Act 2011 requires the Harrow Council to promote and maintain high standards of conduct by Members and Co-opted Members of the Council. It also requires the Council to adopt a code of the conduct expected of such Members when acting in that capacity.

This Code has been prepared and adopted by Harrow Council

The Council having adopted this Code will, from time to time, revise and replace it as is appropriate but will publicise such changes through its website and otherwise for the information of people living in its area.

PART 1

GENERAL PROVISIONS

Introduction and interpretation

- 1.1 This Code defines the standards of conduct, which will be required of you and in your relationships with the Council and its Officers. It has been created to embrace the 10 general principles of conduct which are set out in Appendix 1.
- 1.2 The Code represents the standard against which the public, fellow Councillors, and the Authority's Standards Committee will judge your conduct. A breach of the Code may also constitute a criminal offence.
- 1.3 You should familiarise yourself with the requirements of this Code. You should regularly review your personal circumstances, particularly when those circumstances change. If in any doubt, you should seek advice from the Authority's Monitoring Officer.
- 1.4
 - (1) This Code applies to you as a member of the Council.
 - (2) You should read this Code together with the general principles set out in Appendix 1.
 - (3) It is your responsibility to comply with the provisions of this Code.
 - (4) In this Code –
 - (a) "the Act" means the Localism Act 2011;
 - (b) "body in which the relevant person has a beneficial interest" means a firm in which the relevant person is a partner or a body corporate of which the

relevant person is a director, or in the securities of which the relevant person has a beneficial interest;

- (c) “Co-opted member” means any person who is not a member of the Council but who:
- (i) Is a member of any committee or sub-committee of the council, or
 - (ii) Is a member of and represents the council on any joint committee or joint sub-committee of the Council, or
 - (iii) Is a non-executive member of Cabinet;
- (d) “director” includes a member of the committee of management of an industrial and provident society;
- (e) “land” excludes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income;
- (f) “M” means a member of a relevant authority;
- (g) “meeting” means any meeting of -
- (i) the Council ;
 - (ii) the Executive of the Council ;
 - (i) any of the Council’s or its executive’s committees, sub-committees, joint committees, joint sub-committees, or area committees;
 - (ii) in taking a decision as a Ward Councillor or as a Member of the Executive.
 - (v) at any briefing by officers; and
 - (vi) at any site visit to do with business of the authority
- (h) “member” includes a Co-opted member and an Appointed Member;
- (i) “relevant authority” means the authority of which M is a member;
- (j) “relevant period” means the period of 12 months ending with the day on which M gives a notification for the purposes of paragraphs 9.2 (a) or 12.1 of this Code.
- (k) “relevant person” means M or any other person referred to in paragraph 8.1 (b).
- (l) “securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

(m)“subject to a pending notification” means a notification made of a disclosable pecuniary interest to the Monitoring Officer which has not yet been entered in the Register of Interests.

Scope

2. (1) You must comply with this Code whenever you are acting in your capacity as a Member of the Council.

General obligations

3. (1) You must treat others with respect.
- (2) You must not-
- (a) do anything which may cause the Council to breach any of the equality enactments (as defined in section 33 of the Equality Act 2006
 - (b) bully any person;
 - (c) intimidate or attempt to intimidate any person who is or is likely to be
 - (i) a complainant,
 - (ii) a witness, or
 - (iii) involved in the administration of any investigation or proceedings,in relation to an allegation that a Member (including yourself) has failed to comply with the Council’s code of conduct; or
 - (d) do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the Council .
- (3) In relation to police authorities and the Metropolitan Police Authority, for the purposes of sub-paragraph (2)(d) those who work for, or on behalf of, an authority are deemed to include a police officer.
4. You must not -
- (a) disclose information given to you in confidence by anyone, or information acquired by you which you believe, or ought reasonably to be aware, is of a confidential nature, except where -
 - (i) you have the consent of a person authorised to give it;
 - (ii) you are required by law to do so;

(iii) the disclosure is made to a third party for the purpose of obtaining professional advice provided that the third party agrees not to disclose the information to any other person; or

(iv) the disclosure is -

(aa) reasonable and in the public interest; and

(bb) made in good faith and in compliance with the reasonable requirements of the authority; or

(b) prevent another person from gaining access to information to which that person is entitled by law.

5. You must not conduct yourself in a manner which could reasonably be regarded as bringing your office or the Council into disrepute.

6.1 You:-

(a) must not use or attempt to use your position as a Member improperly to confer on or secure for yourself or any other person, an advantage or disadvantage; and

(b) must, when using or authorising the use by others of the resources of the Council -

(i) act in accordance with the Council's reasonable requirements;

(ii) ensure that such resources are not used improperly for political purposes (including party political purposes); and

(c) must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.

6.2 You may have dealings with the Council on a personal level, for instance as a council tax payer, as a tenant, or as an applicant for a grant or a planning permission. You should never seek or accept preferential treatment in those dealings because of your position as a Member. You should also avoid placing yourself in a position that could lead the public to think that you are receiving preferential treatment. Likewise, you should never use your position as a Member to seek preferential treatment for friends or relatives, or any firm or body with which you are personally connected.

6.3 You should always make sure that any facilities (such as transport, stationery, or secretarial services) provided by the Council for your use in your duties as a Councillor or a committee member or member of the Executive are used strictly for those duties and for no other purpose.

7.1 (1) When reaching decisions on any matter you must have regard to any relevant advice provided to you by –

(a) the Council's Chief Finance Officer; or

(b) the Council's Monitoring Officer,

where that officer is acting pursuant to his or her statutory duties.

(2) You must give reasons for all decisions in accordance with any statutory requirements and any reasonable additional requirements imposed by your authority.

7.2 When reaching decisions you should -

(a) not act or cause the Council to act unlawfully, in such a manner as would give rise to a finding of maladministration, in breach of any undertaking to the Court, or for the advantage of any particular person or interest rather than in the public interest; and

(b) take into account all material information of which you are aware and then take the decision on its merits and in the public interest

7.3 No member may be involved in scrutinising a decision in which he/she has been directly involved. In particular, Portfolio Holder Assistants should not participate in or vote on the scrutiny of matters within their identified remit, as approved by Cabinet.

PART 2

INTERESTS

Disclosable Pecuniary Interests

8.1 A pecuniary interest is a "Disclosable Pecuniary Interest" if it is of a description specified in Appendix 2 and either:

(a) it is the interest of you as a Member or

(b) it is an interest of:

(i) the Member's spouse of civil partner

(ii) a person with whom the Member is living as husband and wife, or

(iii) a person with whom the Member is living as if they were civil partners,

and the Member is aware that the other person has that interest.

8.2 If you are in any doubt as to whether you should continue to participate in any matter, you should take advice from the Monitoring Officer at an early stage as to whether your circumstances permit continued participation.

8.3 You, or some firm or body with which you are personally connected may have professional, business or other personal interests within the area for which the Council is responsible. Such interests may be substantial and closely related to the work of the Executive or one or more of the Council's committees.

- 8.4 You should not seek, or accept, membership of the Executive or any such committee, if that would involve you in disclosing an interest so often that you could be of little value to the Executive or committee, or if it would be likely to weaken public confidence in the duty of the Executive or committee to work solely in the general public interest.

Effect of disclosable pecuniary interests on participation

- 9.1 Where you are present at a meeting of the Council and you are aware that you have a disclosable pecuniary interest in any matter to be considered, or being considered, then:

- (a) if the interest is not entered on the Council's register of interests you must (subject to the provision relating to sensitive interests) disclose the interest to the meeting, and
- (b) if the interest is not entered on the Council's register of interests and is not the subject of a pending notification you must notify the Monitoring Officer of that interest before the end of 28 days beginning with the date of disclosure and
- (c) (i) (subject to any current dispensation) may not participate (or participate further) in any discussion of the matter at the meeting or

(ii) participate in any vote (or vote further) taken on the matter at the meeting

(iii) and must leave the room in which the meeting is being held

- 9.2 If a function of the Council may be discharged by you as a single member acting alone and you are aware that you have a disclosable pecuniary interest in any matter to be dealt with, or being dealt with, in the course of discharging that function then

- (a) if the interest is not entered on the Council's register of interests and is not the subject of a pending notification you must notify the Monitoring Officer of that interest before the end of 28 days beginning with the date when you became aware of the existence of the interest in relation to the business to be dealt with and
- (b) you must not take any steps, (or further steps) in relation to that matter except for the purpose of enabling the matter to be dealt with otherwise than by you.
- (c) decision-making by a single executive member is a matter of particular sensitivity, and if you have a disclosable interest in a matter on which you may take a decision you should wherever possible refer the matter to the Executive for a collective decision.

Other Interests

- 10.1 In addition to the above requirements, if you attend a meeting at which an item of business is to be considered and you are aware that you have a “non-disclosable pecuniary interest or non-pecuniary interest” in that item, you must make verbal declaration of the existence and nature of that interest at or before the consideration of the item of business or as soon as the interest becomes apparent
- 10.2 You have a “non-disclosable pecuniary interest or non-pecuniary interest” in an item of business of your authority where –
- (a) a decision in relation to that business might reasonably be regarded as affecting the well-being or financial standing of you or a member of your family or a person with whom you have a close association to a greater extent than it would affect the majority of the Council Tax payers, ratepayers or inhabitants of the ward or electoral area for which you have been elected or otherwise of the authority’s administrative area, or
 - (b) it relates to or is likely to affect any of the interests listed in the Table in Appendix 2 of this Code, but in respect of a member of your family (other than a “relevant person”) or a person with whom you have a close association and
- that interest is not a disclosable pecuniary interest.

11.1 Dispensations

In cases where a member has a disclosable pecuniary interest, they may still be able to participate and vote at a meeting if they have obtained a dispensation from the Standards Committee in accordance with the provisions set out below:

There are 5 circumstances in respect of which a dispensation may be granted, namely:

- (a) That so many members of the decision-making body have disclosable pecuniary interests in a matter that it would ‘impede the transaction of the business’;
- (b) That, without the dispensation, the representation of different political groups on the body transacting the business would be so upset as to alter the outcome of any vote on the matter;
- (c) That the authority considers that the dispensation is in the interests of persons living in the authority’s area;
- (d) That without a dispensation, no member of the Cabinet would be able to participate in this matter, or
- (e) That the authority considers that it is otherwise appropriate to grant a dispensation

- 11.2 You must make verbal declaration of the existence and nature of any dispensation granted to you at or before the consideration of the item of business or as soon as the interest to which the dispensation relates, becomes apparent. In the event of a blanket dispensation granted to all Members on a particular matter, this should be declared by the Chair at the commencement of the meeting.

Gifts and Hospitality

- 12.1 You must, within 28 days of receipt, notify the Monitoring Officer in writing of any gift, benefit or hospitality with a value in excess of £100 which you have accepted as a member from any person or body other than the authority.
- 12.2 The Monitoring Officer will place your notification on a public register of gifts and hospitality.
- 12.3 This duty to notify the Monitoring Officer does not apply where the gift, benefit or hospitality comes within any description approved by the authority for this purpose.

PART 3

REGISTRATION OF MEMBERS' INTERESTS

Registration of Members' interests

- 13.1 You must, within 28 days of –
- (a) this Code being adopted by the Council or
 - (b) your election or appointment to office (where that is later):
- notify the Council's Monitoring Officer of any disclosable pecuniary interest which you have at the time of notification for registration in the Council's register of members' interests maintained under the Act.
- 13.2 Where you become a member of the Council as a result of re-election or re-appointment the requirement for notification as mentioned in sub-paragraph (1) above applies only to disclosable pecuniary interests not entered in the register when the notification is given.
- 13.3 Entries in the register are not required to be retained once you:
- (a) no longer have that interest or
 - (b) have ceased to be a Member of the Council (otherwise than transitorily on re-election or re-appointment).
- 13.4 Where a Member gives a notification for the purposes of sub-paragraph (1) above the Monitoring Officer must cause the interests notified to be entered on the Register whether or not they are disclosable pecuniary interests.

- 13.5 Where a Member gives a notification for the purposes of paragraphs 9.1(b) or 9.2 (a) above the Monitoring Officer must cause the interest notified to be entered on the Register whether or not they are disclosable pecuniary interests.
- 13.6 You must inform the Monitoring Officer within 28 days of any change to your circumstances regarding any existing registration or need for further registration.

Sensitive information

14. Where you have a personal or declarable pecuniary interest and you and the Monitoring Officer consider that it is of such a nature that disclosure of the details of the interest could lead to you or a person connected to you being subject violence or intimidation then:
- (a) if the interest is entered on the Council's Register, copies that are made available for inspection and any publishes version of the Register must not include details of the interest but may state that you have an interest details of which are withheld under this provision.
 - (b) if by virtue of this Code you are required to disclose an interest at a meeting then that requirement shall be amended to only require disclosure that such an interest exists in respect of the matter concerned, but not the terms of that interest.

APPENDIX 1

THE 10 GENERAL PRINCIPLES OF CONDUCT

Members are reminded of the 10 General Principles of Conduct (as set out below), which govern the conduct of members.

1. **Selflessness** - Members should serve only the public interest and should never improperly confer an advantage or disadvantage on any person.
2. **Honesty and Integrity** - Members should not place themselves in situations where their honesty and integrity may be questioned, should not behave improperly and should on all occasions avoid the appearance of such behaviour.
3. **Objectivity** - Members should make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards or benefits.
4. **Accountability** - Members should be accountable to the public for their actions and the manner in which they carry out their responsibilities, and should co-operate fully and honestly with any scrutiny appropriate to their particular office.
5. **Openness** - Members should be as open as possible about their actions and those of their authority, and should be prepared to give reasons for those actions.
6. **Personal judgement** - Members may take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.
7. **Respect for others** - Members should promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. They should respect the impartiality and integrity of the authority's statutory officers, and its other employees.
8. **Duty to Uphold the Law** - Members should uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.
9. **Stewardship** - Members should do whatever they are able to do to ensure that their authorities use their resources prudently and in accordance with the law.
10. **Leadership** - Members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.

APPENDIX 2

DISCLOSABLE PECUNIARY INTERESTS

The duties to register, disclose and not to participate in respect of any matter in which a member has a Disclosable Pecuniary Interest are set out in Chapter 7 of the Localism Act 2011. For those purposes `Disclosable Pecuniary Interests` are defined as follows –

| <i>Interest</i> | <i>Prescribed description</i> |
|---|---|
| Employment, office, trade, profession or vacation | Any employment, office, trade, profession or vocation carried on for profit or gain. |
| Sponsorship | Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by M in carrying out duties as a member, or towards the election expenses of M. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992). |
| Contracts | Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged. |
| Land | Any beneficial interest in land which is within the area of the relevant authority. |
| Licences | Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer. |
| Corporate tenancies | Any tenancy where (to M's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest. |

| <i>Interest</i> | <i>Prescribed description</i> |
|-----------------|--|
| Securities | <p>Any beneficial interest in securities of a body where—</p> <p>(a) that body (to M's knowledge) has a place of business or land in the area of the relevant authority; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p> |

REPORT FOR: Pension Board

| | |
|-----------------------------|---|
| Date of Meeting: | 2 November 2015 |
| Subject: | London Borough of Harrow Pension Fund: Annual Report and Financial Statements for the year ended 31 March 2015 |
| Responsible Officer: | Dawn Calvert, Director of Finance |
| Exempt: | No |
| Wards Affected: | All |
| Enclosures: | Appendix 1 – London Borough of Harrow Pension Fund: Annual Report and Financial Statements for the year ended 31 March 2015 Appendix 2 – Report of Fund Auditor |

Section 1 – Summary and Recommendation

Summary

The report sets out the London Borough of Harrow Pension Fund Annual Report and Financial Statements for the year ended 31 March 2015 and the Report of the Auditor (Deloitte LLP) to Governance, Audit, Risk Management and Standards Committee. The Board are invited to comment.

Recommendation

That the Board consider the Annual Report and Financial Statements for the year ended 31 March 2015 and the Report of the Fund Auditor and agree any comments they wish to pass on to the Pension Fund Committee.

Section 2 – Report

1. Attached as Appendix 1 is the Annual Report and Financial Statements of the Pension Fund for the year ended 31 March 2015.
2. Attached as Appendix 2 is the report of the Auditor to Governance, Audit, Risk Management and Standards Committee which was considered by them on 10 September 2015
3. The Board are invited to comment on any part of the Report and the comments below are offered to assist in this consideration:

Introduction (Page 3)

Provided by Director of Finance highlighting that during the year the net assets of the Fund increased from £590.8m to £674.8m and the Fund was ranked 14th (out of 81) in the local authority annual league table of investment returns for the year.

Audit Statement (Page 4)

Unqualified.

Scheme Overview (Page 6)

Number of pensioners showing an increase from 4,713 in 2011-12 to 5,294 in 2014-15.

Number of deferred pensioners showing an increase from 5,227 in 2011-12 to 6,323 in 2014-15.

Number of active members stable – 5,506 in 2011-12 and 5,526 in 2014-15

Last actuarial valuation showed a funding level of 70%

Account for year ended 31 March 2015 (Page 18)

| | £m |
|--|--------|
| Contributions by members and employers | - 29.3 |
| Benefits paid | 34.3 |
| Investment income | -10.9 |

The Fund continues to mature in that benefit payments exceed contributions. This trend can be expected to continue as the number of pensioners grows and active membership either stabilises or falls. However, when investment income is taken into account, cashflow remains positive. The impact of falling membership, longevity and pension increases will steadily increase future cash outflows which, in the longer term, may have to be factored into the investment strategy. Discussions with the Actuary on longer term cashflow modelling are ongoing.

Actuarial Statement for 2014-15 (Page 45)

Deficit at the 2013 valuation was £234m (30%) but “there is still a better than 50% chance that the Fund will return to full funding over 20 years.”

Governance Compliance Statement

Largely fully compliant – the Board may wish to review this at their next meeting.

Communications Policy Statement

The Board may wish to review this at their next meeting.

Statement of Investment Principles

The Board are invited to review this elsewhere on the agenda.

Funding Strategy Statement

This will be reviewed by officers and the Actuary during the triennial valuation in 2016 and the Board will be kept informed.

Report of Fund Auditor

The Report describes the review carried out by the Auditor and their conclusions.

The conclusions were almost entirely positive with only one recommendation on page 10 of their report as follows:

The pensions team have implemented a risk register following a previous recommendation made by Deloitte. Our review of the register indicated that certain significant risk definitions (namely contributions and benefits) were not sufficiently robust as to anticipate the full range of potential risk areas.

A revised risk register will be considered by the Pension Fund Committee at their meeting on 25 November taking on board this recommendation.

Financial Implications

4. Whilst this report discusses several aspects of the financial standing of the Pension Fund there are no financial implications arising directly from it.

Risk Management Implications

5. Apart from the risks raised by the Auditor in their report all risks are included within the Pension Fund Risk Register.

Equalities implications

6. There are no direct equalities implications arising from this report.

Council Priorities

7. The financial health of the Pension Fund directly affects the level of employer contribution which in turn affects the resources available for the Council's priorities

Section 3 - Statutory Officer Clearance

| | | |
|-----------------------|-------------------------------------|-------------------------------------|
| Name: Dawn Calvert | <input checked="" type="checkbox"/> | Chief Financial Officer |
| Date: 21 October 2015 | | |
| Name: Caroline Eccles | <input checked="" type="checkbox"/> | on behalf of the Monitoring Officer |
| Date: 16 October 2015 | | |

| | |
|-----------------------------------|-----------------------|
| Ward Councillors notified: | Not applicable |
|-----------------------------------|-----------------------|

Section 4 - Contact Details

Contact: Ian Talbot, Treasury and Pension Fund Manager
0208 424 1450

Background Papers - None

London Borough of Harrow Pension Fund

Annual Report and Financial Statements for the
year ended 31 March 2015



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Appendices

- Appendix 1 Governance Compliance Statement
- Appendix 2 Communications Policy Statement
- Appendix 3 A Brief Guide to the Local Government Pension Scheme
- Appendix 4 Statement of Investment Principles
- Appendix 5 Funding Strategy Statement

INTRODUCTION

The main purpose of the Pension Fund Annual Report is to account for the income, expenditure and net assets of the London Borough of Harrow Pension Fund ('the Fund') for the financial year to 31 March 2015. This Report also explains the administration and management of the Fund, the investment and funding policy objectives and asset allocation, as well as highlighting market and Fund performance.

Information about the economic resources controlled by the Fund is provided by the net assets statement. The actuarial funding level is reported in Note 16 and in the Statement of the Consulting Actuary on page 45.

The Pension Fund Committee is responsible for overseeing the management, administration and strategic direction of the Fund. The Committee continuously reviews the Fund's investment strategy to improve returns within acceptable risk parameters. This in turn minimises the amount the Council and other employers will need to make in contributions to the Fund to meet future liabilities.

During 2014-15, overall, equity markets continued to perform strongly with overseas markets producing returns approaching 20% in local currency and the UK 6.6%. All other asset classes in which the Fund is invested produced positive returns

The net assets of the Fund as at 31 March 2015 were £674.8m compared to £590.80m as at 31 March 2014. The Fund was ranked 14th in the local authority annual league table of investment returns for the year.



Dawn Calvert - CPFA
Director of Finance
24 September 2015

INDEPENDENT AUDITOR'S STATEMENT TO THE MEMBERS OF LONDON BOROUGH OF HARROW ON THE PENSION FUND FINANCIAL STATEMENTS

We have examined the pension fund financial statements for the year ended 31 March 2015, which comprise the Fund Account, the Net Assets Statement and the related notes 1 to 23.

This report is made solely to the members of London Borough of Harrow, as a body, in accordance with Part II of the Audit Commission Act 1998 and for no other purpose, as set out in paragraph 48 of the Statement of Responsibilities of Auditors and of Audited Bodies prepared by the Audit Commission. Our audit work has been undertaken so that we might state to the Authority those matters we are required to state to them in an auditors' 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, as a body, for our audit work, for this report, or for the opinions we have formed.

Respective responsibilities of the Director of Finance and Assurance and the auditor

As explained more fully in the Statement of the Director of Finance and Assurance's Responsibilities, the Director of Finance and Assurance is responsible for the preparation of the pension fund's financial statements in accordance with applicable United Kingdom law.

Our responsibility is to report to you our opinion on the consistency of the pension fund financial statements within the pension fund annual report with the pension fund financial statements in the statement of accounts of London Borough of Harrow, and its compliance with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15.

We also read the other information contained in the pension fund annual report as described in the contents section and consider the implications for our report if we become aware of any apparent misstatements or material inconsistencies with the pension fund financial statements.

We conducted our work in accordance with guidance issued by the Audit Commission. Our report on the administering authority's full annual statement of accounts describes the basis of our opinion on those financial statements.

Opinion

In our opinion, the pension fund financial statements are consistent with the full annual statement of accounts of London Borough of Harrow for the year ended 31 March 2015 and comply with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15.

Paul Schofield (Engagement Lead)
For and on behalf of Deloitte LLP
Cambridge, UK

24 September 2015

SCHEME MANAGEMENT AND ADVISORS

| | |
|-------------------------|--|
| Administering Authority | London Borough of Harrow |
| Pension Fund Committee | Councillor Keith Ferry (Chairman) Councillor Bharat Thakker(Vice Chairman) Councillor Adam Swersky Councillor Barry Macleod-Cullinane |
| Independent Advisors | Colin Robertson Richard Romain |
| Co-optee | Howard Bluston |
| Trade Union Observers | John Royle - UNISON Pamela Belgrave - GMB |
| Officer | Simon George, Director of Finance and Assurance |
| Actuary | Hymans Robertson LLP |
| Investment Consultant | Aon Hewitt Limited |
| Investment Managers | Aviva Investors Global Services Limited BlackRock Investment Management (UK) Limited GMO LLC Insight Investment Longview Partners Oldfield Partners Pantheon Ventures Record Currency Management Limited Standard Life Investments State Street Global Advisors Limited |
| AVC Providers | Clerical Medical Equitable Life Assurance Society Prudential Assurance |
| Custodians | JP Morgan, Northern Trust, Brown Brothers Harriman & Bank of New York Mellon |
| Auditor | Deloitte LLP |
| Performance Measurement | State Street Global Services |
| Bankers | The Royal Bank of Scotland |

SCHEME OVERVIEW

The Harrow Pension Fund ('the Fund') is part of the Local Government Pension Scheme ("LGPS") and is administered by the London Borough of Harrow. The Council is the reporting entity for the Fund.

a) General

The Scheme is governed by the Public Service Pensions Act 2013.

The Fund is administered in accordance with the following secondary legislation:

- The Local Government Pension Scheme Regulations 2013 (as amended)
- The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended)
- The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009.

It is a contributory defined benefit pension scheme designed to provide pensions and other benefits for pensionable employees of the Council and a range of other scheduled and admitted bodies. Teachers, police officers and firefighters are not included as they come within other national pension schemes.

The Fund is overseen by the Harrow Pension Fund Committee, which is a committee of the Council.

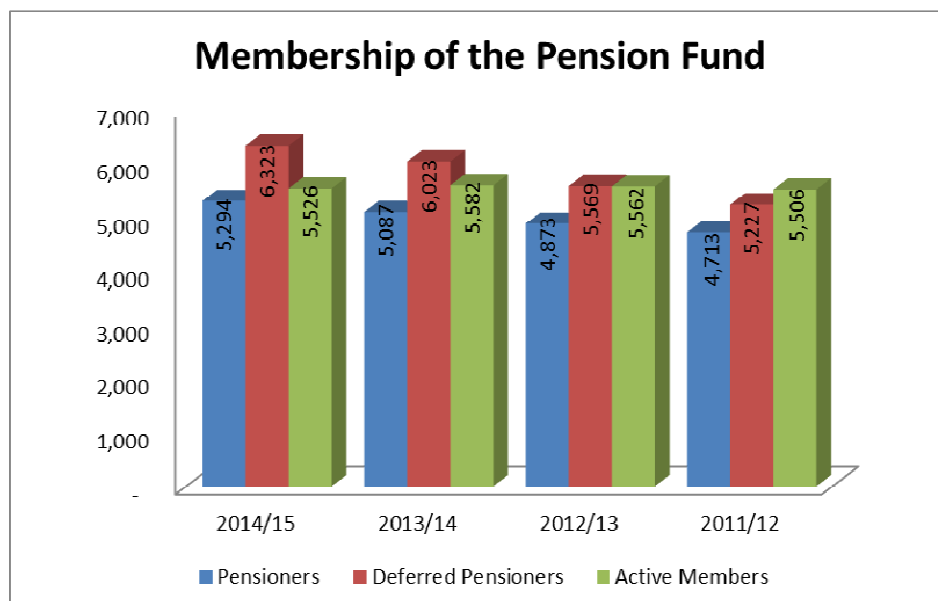
b) Memberships

Membership of the LGPS is voluntary and employees are free to choose whether to join the Scheme, remain in the Scheme or make their own personal arrangements outside the Scheme.

Organisations participating in the Fund are:

- **Scheduled Employer:** These are statutorily defined bodies listed within the LGPS Regulations and have a statutory obligation to participate in the LGPS (e.g. a local authority, a further or higher education establishment).
- **Community Admission Body:** These are typically charities or other not-for-profit public sector bodies providing a public service which has sufficient links with the administering employer to be regarded as having a community of interest.
- **Transferee Admission Body:** These are typically private sector companies or charities which will have taken on staff from a local authority as a result of an outsourcing of services.

There are 29 employer organisations within the Harrow Pension Fund including the Council itself, as detailed below.



| Employer | Status | Actives | Deferred | Pensioners | Total | % |
|---------------------------|---------------------------|---------|----------|------------|--------|--------|
| Harrow Council | Scheduled Body | 4,066 | 5,469 | 4,982 | 14,517 | 84.68 |
| Alexandra School | Scheduled Body | 27 | 1 | 1 | 29 | 0.17 |
| Avanti Free School | Scheduled Body | 15 | 1 | 0 | 16 | 0.09 |
| Aylward Primary School | Scheduled Body | 73 | 5 | 0 | 78 | 0.45 |
| Bentley Wood School | Scheduled Body | 60 | 43 | 7 | 110 | 0.64 |
| Canons High School | Scheduled Body | 91 | 29 | 6 | 126 | 0.73 |
| Harrow College | Scheduled Body | 152 | 257 | 137 | 546 | 3.18 |
| Harrow High School | Scheduled Body | 64 | 30 | 6 | 100 | 0.58 |
| Hatch End School | Scheduled Body | 87 | 110 | 8 | 205 | 1.20 |
| Heathland and Whitefriars | Scheduled Body | 129 | 3 | 0 | 132 | 0.77 |
| Krishna Avanti Primary | Scheduled Body | 25 | 4 | 0 | 29 | 0.17 |
| Nower Hill High School | Scheduled Body | 124 | 71 | 6 | 201 | 1.17 |
| Park High School | Scheduled Body | 83 | 36 | 2 | 121 | 0.71 |
| Rooks Heath College | Scheduled Body | 117 | 30 | 5 | 152 | 0.89 |
| Salvatorian College | Scheduled Body | 49 | 37 | 5 | 91 | 0.53 |
| St Dominics College | Scheduled Body | 49 | 25 | 30 | 104 | 0.61 |
| Stanmore College | Scheduled Body | 87 | 127 | 63 | 277 | 1.62 |
| NLCS | Community Admission Body | 75 | 30 | 28 | 133 | 0.78 |
| Birkin | Transferee Admission Body | 10 | 0 | 0 | 10 | 0.06 |
| Capita Business Services | Transferee Admission Body | 11 | 1 | 0 | 12 | 0.07 |
| Carillion Services | Transferee Admission Body | 81 | 6 | 6 | 93 | 0.54 |
| Chartwells | Transferee Admission Body | 19 | 0 | 0 | 19 | 0.11 |
| Govindas | Transferee Admission Body | 5 | 0 | 0 | 5 | 0.03 |
| Granary Kids | Transferee Admission Body | 1 | 1 | 1 | 3 | 0.02 |
| Jubilee Academy | Transferee Admission Body | 16 | 4 | 0 | 20 | 0.12 |
| Julius Rutherford | Transferee Admission Body | 1 | 2 | 1 | 4 | 0.02 |
| Linbrook | Transferee Admission Body | 4 | 1 | 0 | 5 | 0.03 |
| Taylor Shaw | Transferee Admission Body | 3 | 0 | 0 | 3 | 0.02 |
| Temco Facilities Services | Transferee Admission Body | 2 | 0 | 0 | 2 | 0.01 |
| | Total | 5,526 | 6,323 | 5,294 | 17,143 | 100.00 |

c) Funding

Membership of the Fund is voluntary. Full-time, part-time and casual employees, where there is a mutuality of obligation and who have a contract of more than three months, are brought into the Fund automatically but have the right to “opt out” if they so wish. Casual employees with no mutuality of obligation are not eligible for membership.

Employee contribution rates are set by regulations and are dependent upon each member’s full time equivalent salary. Employee contributions attract tax relief at the time they are deducted from pay and the employee also pays lower National Insurance contributions between the Lower and Upper Earnings Limits, unless the employee has opted to pay the married woman’s reduced rate.

Employers participating in the Fund pay different rates of contributions depending on their history, their staff profile and any deficit recovery period agreed with the Fund. Employer contribution rates are reviewed as part of the triennial actuarial valuation. The last valuation took place as at 31 March 2013 and showed that the Fund was 70% Funded. The deficit is to be funded by additional employer contributions over the course of 20 years.

Benefits are funded by contributions and investment earnings. Contributions are made by active members of the Fund in accordance with the LGPS Regulations 2013 and range from 5.5% to 12.5% of pensionable pay. Employee contributions are matched by employers’ contributions which are set based on triennial actuarial funding valuations. Currently almost all, employer contribution rates fall within the range 15% to 28% of pensionable pay with most of the largest employers paying 19.85%.

d) Benefits

Prior to 1 April 2014, pension benefits under the LGPS were based on final pensionable pay and length of pensionable service, summarised below.

| | Service pre 1 April 2008 | Service post 31 March 2008 |
|-----------------|---|---|
| Pension | Each year worked is worth 1/80 x final pensionable salary | Each year worked is worth 1/60 x final pensionable salary |
| Lump Sum | Automatic lump sum of 3 x salary. In addition, part of the annual pension can be exchanged for a one-off tax-free cash payment. A lump sum of £12 is paid for each £1 of pension given up | No automatic lump sum. Part of the annual pension can be exchanged for a one-off tax-free cash payment. A lump sum of £12 is paid for each £1 of pension given up |

From 1 April 2014, the Scheme became a career average scheme, whereby members accrue benefits based on their pensionable pay in each year at an accrual rate of 1/49th. Accrued pension is updated annually in line with the Consumer Prices Index.

There are a range of other benefits provided under the Scheme including early retirement, disability pensions and death benefits. For more details, please refer to the ‘Brief Guide to the Local Government Pension Scheme’ attached as Appendix 3.

GOVERNANCE ARRANGEMENTS

The Council has delegated to the Pension Fund Committee various powers and duties in respect of its administration of the Fund. The Committee met four times during the year .It comprises four Councillors with full voting rights. Representatives from the trade unions are able to participate as members of the Committee but do not have voting rights.

The Pension Fund Committee has the following terms of reference:

- 1) to exercise on behalf of the Council, all the powers and duties of the Council in relation to its functions as Administering Authority of the LB Harrow Pension Fund (the Fund), save for those matters delegated to other Committees of the Council or to an Officer;
- 2) the determination of applications under the Local Government Superannuation Regulations and the Teachers' Superannuation Regulations;
- 3) to administer all matters concerning the Council's pension investments in accordance with the law and Council policy;
- 4) to establish a strategy for the disposition of the pension investment portfolio;
- 5) to appoint and determine the investment managers' delegation of powers of management of the Fund;
- 6) to determine cases that satisfy the Early Retirement provision under Regulation 26 of the Local Government Pension Scheme Regulations 1997 (as amended), and to exercise discretion under Regulation 8 of the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2000 (as amended), subject to the conditions now agreed in respect of all staff, excluding Chief Officers;
- 7) to apply the arrangements set out in (6) above to Chief Officers where the application has been recommended by the Chief Executive, either on the grounds of redundancy, or in the interests of the efficiency of the service, and where the application was instigated by the Chief Executive in consultation with the leaders of the political groups.

The Committee is advised by two independent advisors, a co-optee and an Investment Consultant.

The dates of the Pension Fund Committee meetings, along with meeting agendas, reports and minutes are available on the Harrow Council website:

<http://www.harrow.gov.uk/www2/mgCommitteeDetails.aspx?ID=1297>

During 2014/15 arrangements were put in place for the appointment of a Local Pension Board which, from 2015/16 will assist the Council and the Pension Fund Committee in the administration of the Fund.

INVESTMENT POLICY AND PERFORMANCE

Investment Market Commentary

Equity markets performed strongly but with marked regional differences. UK equities returned only 6% for the year with investors concerned about the possibility of political uncertainty resulting from a hung Parliament post the general election. Japan was the strongest performing of the major overseas markets returning over 30% to local investors, but a slightly lower 27% to UK investors as the Yen continued to weaken against Sterling. Conversely UK investors benefited from the strength of the US Dollar over the year which represented almost half of the US equity return of 25%, Pacific and emerging markets returned 16% and 14% respectively whilst Europe returned 9% for the year.

After the near flat outcome in 2013/14, UK bonds bounced back strongly, producing double digit returns. Duration was the big story of the latest year with marked differences in return depending upon where funds were invested across the yield curve. Long dated gilts produced returns approaching 30% as yields reached historic lows. Investors needing to hold them for liability matching purposes continued to buy them at any price. On the other, hand, short dated bonds returned only 3% for the year. The index-linked story for the year was much the same; funds returning 20% on average with the return driven by longer dated issues.

Alternative investments in aggregate also enjoyed a good year. Private equity returned 16% whilst hedge funds averaged 9%. Pooled multi asset (diversified growth) investments, which have recently been gaining traction amongst funds, returned a strong 10%, well ahead of most funds' targets for this asset class. Property returned 16% for the year.

Investment Policy

The investment objective of the Fund is to achieve a return that is sufficient to meet the primary funding objective of minimising the level of employer contribution in order to meet the cost of Fund benefits as required by statute, subject to an appropriate level of risk (implicit in the target) and liquidity.

The Council has delegated the management of the Fund's investments to professional investment managers, appointed in accordance with the LGPS regulations, whose activities are specified in detailed investment management agreements and regularly monitored.

The Fund Statement of Investment Principles specifies that the Fund may invest in accordance with the Regulations in equities, fixed interest and other bonds and property, in the UK and overseas markets. The Regulations specify other investment instruments that may be used, for example, financial futures, traded options, insurance contracts, stock lending and sub-underwriting contracts.

To support the Fund's objective of achieving a return that is sufficient to meet the cost of benefits and achieving this within acceptable risk parameters the Committee, in conjunction with the Fund's investment advisor, set the strategic asset allocation on 6 March 2013.

The Committee aims to achieve its investment objective by maintaining a high allocation to growth assets, mainly equities, reflecting the security of the sponsor's covenant, the funding level, the long time horizon of the Fund and the projected asset class returns and volatility. Diversifying investments reduces the risk of a sharp fall in one particular market having a substantial impact on the whole Fund.

During the year contracts with Fidelity, Wellington and Barings were terminated and new agreements put in place with GMO, Oldfields and Insight. The State Street mandate was changed from UK equities to global equities. The overall equity portfolio was rebalanced to implement the strategy agreed by the Committee.

The following table compares the actual asset allocation as at 31 March 2015 to the agreed allocation

| Investment assets | Actual Percentage of Fund | Agreed Allocation |
|----------------------------------|---------------------------|-------------------|
| | % | % |
| Fixed interest securities | 10 | 10 |
| Index-linked securities | 3 | 3 |
| Developed world equities-active | 23 | 21 |
| Emerging markets equities-active | 11 | 10 |
| Global equities-passive | 33 | 31 |
| Pooled property | 8 | 10 |
| Private equity | 3 | 5 |
| Diversified growth funds | 9 | 10 |
| Total | 100 | 100 |

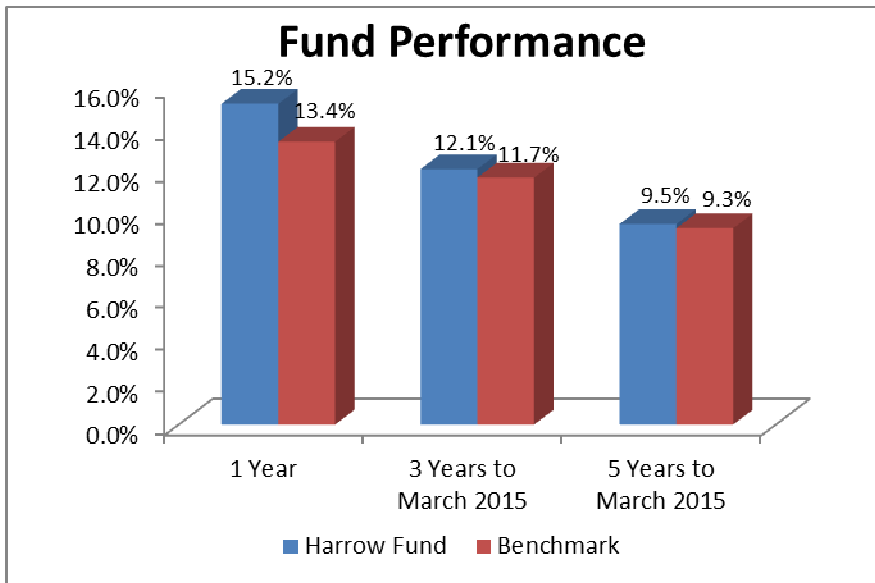
The Committee believes in appointing Fund managers with clear performance benchmarks that place maximum accountability for performance against that benchmark with the investment manager. Fund managers are set risk parameters to provide them with some flexibility in achieving the asset allocation to allow them to make the most of market conditions. They must seek approval for any positions that go beyond the agreed risk parameters set for their strategies. Following the manager changes discussed above, the Fund has ten investment managers to give diversification of investment style and spread of risk. The Committee will continue to monitor the ability of the investment managers to achieve their target returns.

Investments held by Fund Managers

| Market value 31 March 14 | Percentage of Fund | Manager | Investment assets | Market value 31 March 15 | Percentage of Fund |
|-----------------------------|-----------------------|---------------|----------------------------------|-----------------------------|-----------------------|
| £'000 | % | | | £'000 | % |
| 57,567 | 10 | BlackRock | Fixed interest securities | 69,247 | 10 |
| 14,468 | 2 | BlackRock | Index-linked securities | 17,130 | 3 |
| 68,381 | 12 | Fidelity | Global equities-active | 0 | 0 |
| 0 | 0 | GMO | Emerging markets equities-active | 76,541 | 11 |
| 49,507 | 8 | Longview | Developed world equities-active | 75,561 | 11 |
| 0 | 0 | Oldfields | Developed world equities-active | 77,276 | 12 |
| 113,911 | 19 | Wellington | Global equities-active | 0 | 0 |
| 0 | 0 | State Street | Global equities-passive | 220,601 | 33 |
| 155,512 | 27 | State Street | UK equities-passive | 0 | 0 |
| 45,051 | 8 | Aviva | Pooled property | 50,562 | 8 |
| 24,648 | 4 | Pantheon | Private equity | 22,954 | 3 |
| 26,630 | 5 | Barings | Diversified growth fund | 0 | 0 |
| 0 | 0 | Insight | Diversified growth fund | 28,857 | 4 |
| 27,890 | 5 | Standard Life | Diversified growth fund | 30,678 | 5 |
| 1,113 | 0 | Record | Forward currency contracts | -2,649 | 0 |
| 602 | 0 | BlackRock | Cash deposits | 865 | 0 |
| 0 | 0 | JP Morgan | Cash deposits | 272 | 0 |
| 585,280 | 100 | | Total | 667,895 | 100 |

Fund performance

The Committee uses State Street Global Services as its independent investment performance measurer. Investment returns over 1, 3 and 5 years are shown below.



Source: State Street Global Services

The Fund's return of 15.2% during 2014-15 was due to positive returns for all assets classes. Returns over all three time periods were strong, reflecting recovery from the significantly lower returns achieved at the height of the financial crisis in 2008.

The average local authority fund (as measured by State Street Global Services) returned 13.2% on its assets during the year. The Council's Fund was ranked 14th (2013-14: 19th) in the local authority annual league table of investment returns for the year. This was almost entirely due to the relatively low commitment to the UK equity market and successful stock selection policies of the various fund managers.

STATEMENTS AND PUBLICATIONS

Governance Compliance Statement

The Local Government Pension Scheme (Administration) Regulations 2008 Regulation 31 require all administering authorities to produce a Governance Compliance Statement. This Statement must set out whether the Administering Authority delegates its function and if so what the terms, structure and operation of the delegation are. The Administering Authority must also state the extent to which a delegation complies with guidance given by the Secretary of State. The current Statement can be found in Appendix 1.

Communications Policy Statement

The Local Government Pension Scheme (Administration) Regulations 2008 require all administering authorities to produce a Communications Policy Statement. This statement sets out the Fund's strategy for communicating with members, members' representatives, prospective members and employing authorities, together with the promotion of the Scheme to prospective members and their employing authorities. The latest Statement can be found in Appendix 2.

Local Government Pension Scheme Guide

A brief guide to the Local Government Pension Scheme can be found in Appendix 3

Statement of Investment Principles

Regulation 12 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 requires administering authorities to publish a Statement of Investment Principles. This Statement provides details of the Fund's investment policies including:

- The types of investment to be held;
- The balance between different types of investment; and
- Risk measurement and management.

The Statement also details the Fund's compliance with the six principles set out in the Chartered Institute of Public Finance and Accountancy's publication 'Investment Decision Making and Disclosure in the Local Government Pension Scheme 2009 – a guide to the application of the 2008 Myners Principles to the management of LGPS Funds'.

The current version can be found in Appendix 4.

Funding Strategy Statement

Regulation 35 of the Local Government Pension Scheme (Administration) Regulations 2008 requires all administering authorities to produce a Funding Strategy Statement. The purpose of the Funding Strategy Statement is to explain the funding objectives of the Fund, in particular:

- How the costs of the benefits provided under the LGPS are met through the Fund;
- The objectives in setting employer contribution rates; and
- The funding strategy that is adopted to meet these objectives.

The Funding Strategy Statement is reviewed every three years at the same time as the triennial actuarial valuation of the Fund. An interim review of the Statement may be carried out and a revised Statement published if there has been a material change in the policy matters set out in the Statement or there has been a material change to the Statement of Investment Principles. The current full Statement can be found in Appendix 5.

RISK MANAGEMENT

The Fund's primary long term risk is that the assets will fall short of its liabilities (i.e. promised benefits payable to members). The Pension Fund Committee is responsible for managing and monitoring risks and ensuring that appropriate risk management processes are in place and operating effectively. The aim of risk management is to limit risks to those that are expected to provide opportunities to add value.

The most significant risks faced by the Fund and the procedures in place to manage these risks are described below:

Governance and Regulatory Risk

The failure to exercise good governance and operate in line with regulations can lead to financial as well as reputation risk. These risks are managed through:

- Regular reviews of the Statement of Investment Principles and Funding Strategy Statement that set out the high level objectives of the Fund and how these will be achieved;
- Tailored training for members;
- Reviews of the Pension Fund Committee agenda and papers by Harrow's Legal Department; and
- Establishment of the Pension Board.

i) Sponsor Risk

The Fund is currently in deficit and achieving a fully funded status may require the continued payment of deficit contributions. The Actuary reviews the required level of contributions every three years. To protect the Fund and the Administering Employer, bonds and other forms of security are received from Admitted employers.

ii) Investment Risk

The Fund is invested in a range of asset classes as detailed in Note 13. This is done in line with the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 which require pension funds to invest any monies not immediately required to pay benefits. These Regulations require the formulation of a Statement of Investment Principles which sets out the Fund's approach to investment including the management of risk. The predominant asset class is listed equities, which has both a greater expected return and volatility than the other main asset classes. Potential risks affecting investments include:

Pricing Risk

The valuation of investments is constantly changing, impacting on the potential realisation proceeds and income. For example, the value of the Fund's investments increased by 14% in 2014-15 compared to 11% for the previous year. Most of the price changes relate to the value of global equities. Changes of a similar magnitude are possible in future.

Procedures in place to manage the volatility of investments include:

- Diversification of the investments between asset classes and geographical areas to include fixed interest and index linked bonds, property, multi assets mandates and private equity. The investment strategy is reviewed by the Pension Fund Committee and market

conditions are reviewed to monitor performance at every meeting to determine if any strategic action is required;

- Global equities are managed by three active managers and diversified growth funds by two managers to reduce the risk of underperformance against benchmarks. The Investment Advisor provides quarterly reports on the performance and skills of each manager to the Pension Fund Committee; and
- The benefit liabilities are all Sterling based and to reduce the currency risk from non Sterling investments, 50% of the overseas currency exposures are hedged to Sterling.

Liquidity Risk

Investments in some asset classes e.g. private equity and property can be illiquid in that they cannot be realised at short notice. Around 11% of Harrow's Fund is in illiquid assets. This is deemed appropriate for a fund that continues to have a positive cashflow. All cash balances are managed in accordance with the Council's Treasury Management Strategy Statement and are all currently on overnight deposit and readily accessible.

Counterparty Risk

The failure by a counterparty, including an investee company, can lead to an investment loss. This risk is mainly managed through wide diversification of counterparties and also through detailed selection of counterparties by external fund managers.

iii) Actuarial Risk

The value of the liability for future benefits is impacted by changes in inflation, salary levels, life expectancy and expected future investment returns. Although there are opportunities to use financial market instruments to manage some of these risks, the Pension Fund Committee does not currently believe these to be appropriate. Recent changes to the benefits structure will reduce some of these risks. All are monitored through the actuarial valuation process and additional contributions required from employers should deficits arise.

iv) Operational Risk

Operational risk relates to losses (including error and fraud) from failures in internal controls relating to investment managers and internally e.g. administration systems.

Controls at external fund managers are monitored through the receipt of audited annual accounts for each manager together with annual assessments of the control environment including reviews of internal controls reports certified by reporting accountants.

Controls within the Administering Authority are reviewed by Harrow's Internal Audit Team.

CONTACTS

| | |
|--------------------------|--|
| Registered Address | London Borough of Harrow Shared Services - Pensions, 3rd Floor South Wing, Civic Centre, Harrow, HA1 2XF |
| Administration Enquiries | Email address: Pension@harrow.gov.uk Telephone Number: 020 8424 1186 Website: www.harrowpensionfund.org |
| Complaints and Advice | The Pensions Advisory Service 11 Belgrave Road London SW1V 1RB Telephone Number: 0300 123 1047 Website: www.pensionsadvisoryservice.org.uk The Pensions Regulator Napier House Trafalgar Place Brighton BN1 4DW Telephone Number: 0870 6063636 Website: www.thepensionsregulator.gov.uk The Pensions Ombudsman 11 Belgrave Road London SW1V 1RB Telephone Number: 0207 630 2200 Fax Number: 0207 821 0065 Email: enquiries@pensions-ombudsman.org.uk Website: www.pensions-ombudsman.org.uk |
| Tracing Service | The Pension Tracing Service Tyneview Park Whitley Road Newcastle Upon Tyne NE98 1BA Telephone Number: 0845 6002 537 Website: www.gov.uk/find-lost-pension |

STATEMENT OF RESPONSIBILITIES FOR THE FINANCIAL STATEMENTS

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 Harrow, that officer is the Chief Financial Officer, i.e., the Director of Finance;
- To manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets; and
- To approve the Financial Statements.

The Director of Finance's Responsibilities

The Director of Finance is responsible for the preparation of the Fund's Statement of Accounts in accordance with proper practices set out in the CIPFA Code of Practice on Local Authority Accounting.

In preparing this Statement of Accounts, the Director of Finance has:

- Selected suitable accounting policies and then applied them consistently;
- Made judgements and estimates that were reasonable and prudent;
- Complied with the Code of Practice on Local Authority Accounting;
- Kept proper accounting records which were up to date; and
- Taken reasonable steps for the prevention and detection of fraud and other irregularities.

I certify that these Financial Statements present fairly the financial position of the London Borough of Harrow Fund of the Local Government Pension Scheme as at 31 March 2015 and its income and expenditure for the year then ended.



Dawn Calvert – CPFA
Director of Finance
24 September 2015

Harrow Pension Fund Account for the year ended 31 March 2015

| 2013/14 | | Notes | 2014/15 |
|-----------------|---|-------|-----------------|
| £'000 | | | £'000 |
| | Dealings with members, employers and others directly involved in the fund | | |
| -25,458 | Contributions | 6 | -28,013 |
| -2,874 | Individual transfers in from other pension funds | 7 | -1,267 |
| -306 | Other income | | -35 |
| -28,638 | | | -29,315 |
| 31,259 | Benefits | 8 | 32,008 |
| 1,074 | Payments to and on account of leavers | 9 | 2,266 |
| 32,333 | | | 34,274 |
| 3,695 | Net additions/reductions from dealings with members | | 4,959 |
| 820 | Management expenses | 10 | 1,095 |
| | Return on investments | | |
| -7,468 | Investment income | 11 | -10,863 |
| -75 | Investment management expenses | 12 | 113 |
| -35,562 | Profit/losses on disposal of investments and changes in the market value of investments | 13A | -79,332 |
| -43,105 | Net return on investments | | -90,082 |
| -38,590 | Net (increase)/decrease in the net assets available for benefits during the year | | -84,028 |
| -552,227 | Net Assets at start of year | | -590,817 |
| -590,817 | Net Assets at end of year | | -674,845 |

Net Assets Statement as at 31 March 2015

| 31/03/2014 | | Notes | 31/03/2015 |
|----------------|--|-------|----------------|
| £'000 | | | £'000 |
| | Investment assets | | |
| 583,565 | Pooled investment vehicles | 13B | 669,407 |
| <u>1,351</u> | Derivative contracts | 13B | <u>1,459</u> |
| 584,916 | | | 670,866 |
| | Investment liabilities | | |
| <u>-238</u> | Derivative contracts | 13B | <u>-4,108</u> |
| 584,678 | | | 666,758 |
| <u>602</u> | Cash with investment managers | | <u>1,137</u> |
| 585,280 | | | 667,895 |
| <u>4,271</u> | Cash deposits | | <u>5,793</u> |
| 589,551 | | | 673,688 |
| 2,000 | Current assets | 18 | 2,051 |
| <u>-734</u> | Current liabilities | 19 | <u>-894</u> |
| 590,817 | Net assets of fund available to fund benefits at the period end | | 674,845 |

The accounts summarise the transactions of the Fund and deal with the net assets. The Net Assets Statement does not take account of the obligations to pay pensions and benefits which fall due after the end of the Fund year. The actuarial position of the Fund, which does take account of such obligations, is dealt with in the actuarial statement included on pages 45,46 and 47 and these Financial Statements should be read in conjunction with it.

D. Calvert

Dawn Calvert – CPFA
Director of Finance
24 September 2015

Notes to the Harrow Pension Fund

Accounts for the year ended

31 March 2015

NOTE 1: BASIS OF PREPARATION

The Statement of Accounts summarises the Fund's transactions for the 2014/15 financial year and its position at year-end as at 31 March 2015. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2014/15 which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector.

The accounts summarise the transactions of the Fund and report on the net assets available to pay pension benefits. The accounts do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year.

NOTE 2: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Fund account - Income

a) Contributions income

Normal contributions, both from the members and from employers, are accounted for on an accruals basis at the percentage rate recommended by the Fund actuary in the financial year to which they relate.

Employer deficit funding contributions are accounted for on the due dates on which they are payable under the schedule of contributions set by the Fund actuary or on receipt if earlier than the due date.

Employers' augmentation contributions and pensions strain contributions are accounted for in the period in which the liability arises. Any amount due in year but unpaid will be classed as a current financial asset.

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 Local Government Pension Scheme Regulations (see notes 7 and 9).

Individual transfers in/out are accounted for when received/paid, which is normally when the member liability is accepted or discharged.

Transfers in from members wishing to use the proceeds of their additional voluntary contributions to purchase Scheme benefits are accounted for on a receipts basis.

c) Investment income

i) Interest income

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

ii) Distributions from pooled funds

Distributions from pooled funds are recognised at the date of issue.

iii) Movement in the net market value of investments

Changes in the net market value of investments are recognised as income and comprise all realised and unrealised gains/losses during the year.

Fund account – Expenditure

a) Benefits payable

Pensions and lump-sum benefits payable include all amounts known to be due as at the end of the financial year. Any amounts due but unpaid are disclosed in the net assets statement as current liabilities.

b) 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. 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.

c) Management expenses

The Council discloses its Pension Fund management expenses in accordance with the CIPFA guidance *Accounting for Local Government Pension Scheme Management Costs*.

d) Administrative expenses

All administrative expenses are accounted for on an accruals basis. All staff costs of the Pension's Administration Team are recharged to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and recharged as expenses to the Fund.

e) Oversight and governance costs

All oversight and governance expenses are accounted for on an accruals basis.

f) Investment management expenses

All investment management expenses are accounted for on an accruals basis.

Where an investment manager's fee note has not been received by the balance sheet date, an estimate based upon the market value of their mandate as at the end of the year

is used for inclusion in the Fund account. In 2014/15, £0.3m of fees is based on such estimates (2013/14: £0.1m).

The costs of the Council's in-house Fund Management Team are recharged to the Fund and a proportion of the Council's costs representing management time spent by officers on investment management are also charged to the Fund.

Net assets statement

a) 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 assets 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 fair value of an asset are recognised in the Fund account.

The values of investments as shown in the net assets statement have been determined as follows:

i) Market-quoted investments

The value of an investment for which there is a readily available market price is determined by the bid market price ruling on the final day of the accounting period.

ii) Fixed interest securities

Fixed interest securities are recorded at bid market price ruling on the final day of the accounting period.

iii) Unquoted investments

Investments in private equity funds and unquoted listed partnerships are valued based on the Fund's share of the net assets in the private equity fund or limited partnership using the latest financial statements published by the respective fund managers in accordance with the guidelines set out by the British Venture Capital Association. The Fund's private equity investments are valued by the manager at 31 December 2014 and are adjusted to take into account distributions/contributions and exchange rate movements taking place up to 31 March 2015

iv) Pooled investment vehicles

Pooled investment vehicles are valued at closing bid price if both bid and offer prices are published; or if single priced, at the closing price available. In the case of pooled investment vehicles that are accumulation funds, change in market value also includes income which is reinvested in the Fund, net of applicable withholding tax.

b) 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.

Derivative contract assets are fair valued at bid prices and liabilities are fair valued at offer prices. Changes in the fair value of derivative contracts are included in change in market value.

The future value of forward currency contracts is based on market forward exchange rates at the year-end date and determined as the gain or loss that would arise if the outstanding contract were matched at the year-end with an equal and opposite contract.

c) Cash and cash equivalents

Cash comprises cash in hand and demand deposits and includes amounts held by the Fund's external managers and custodians.

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.

d) 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.

e) Actuarial present value of promised retirement benefits

The actuarial present value of promised retirement benefits is assessed on an annual basis by the Fund actuary in accordance with the requirements of IAS 19 and relevant actuarial standards.

As permitted under the Code, the Fund has opted to disclose the actuarial present value of promised retirement benefits by way of a note to the net assets statement (Note 17).

NOTE 3: CRITICAL JUDGEMENTS IN APPLYING ACCOUNTING POLICIES

Unquoted private equity investments

It is important to recognise the subjective nature of determining the fair value of private equity investments. They are inherently based on forward-looking estimates and judgements involving many factors. Unquoted private equities are valued by the investment managers using guidelines set out by the British Venture Capital Association. The value of unquoted private equities at 31 March 2015 was £23.0m (31 March 2014 £24.6 m).

Pension Fund liability

The Pension Fund liability is calculated every three years by the appointed actuary. Annual updates in the intervening years use the methodology in line with accepted guidelines and in accordance with IAS 19. Assumptions underpinning the valuations are agreed with the actuary and are summarised in notes 16 and 17. The latter estimate is subject to significant variances based on changes to the underlying assumptions.

NOTE 4: ASSUMPTIONS MADE ABOUT THE FUTURE AND OTHER MAJOR SOURCES OF ESTIMATION UNCERTAINTY

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities at the balance sheet date and the amounts reported for the revenues and expenses 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 outcomes could differ from the assumptions and estimates.

The items in the net assets statement at 31 March 2015 for which there is a significant risk of material adjustment in the forthcoming financial year are as follows;

| Item | Uncertainties | Effect if actual results differ from assumptions |
|--|--|---|
| Actuarial present value of promised retirement benefits | Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. A firm of consulting actuaries is engaged to provide the fund with expert advice about the assumptions to be applied. | The effects on the net pension liability of changes in individual assumptions can be measured. For instance, a 0.5% decrease in the discount rate assumption would result in an increase in the pension liability of £93m. A 0.5% increase in assumed earnings inflation would increase the value of liabilities by approximately £24m, a 0.5% increase in pension increase would increase the liability by approximately £67m and a one-year increase in assumed life expectancy would increase the liability by approximately £30m. |
| Private equity | Private equity investments are valued at fair value in accordance with British Venture Capital Association guidelines. These investments are not publicly listed and as such there is a degree of estimation involved in the valuation. | The total private equity investments in the financial statements are £23.0m. There is a risk that this investment may be under- or overstated in the accounts. |

NOTE 5: EVENTS AFTER THE REPORTING DATE

These are events that occur between the end of the reporting period and the date when the financial statements are authorised for issue.

The Fund is not aware of any such events.

NOTE 6: CONTRIBUTIONS RECEIVABLE

By category

| 2013/14 | | 2014/15 |
|----------------|-----------|----------------|
| £'000 | | £'000 |
| -19,142 | Employers | -21,452 |
| -6,316 | Members | -6,561 |
| -25,458 | | -28,013 |

By authority

| 2013/14 | | 2014/15 |
|----------------|-----------------------------|----------------|
| £'000 | | £'000 |
| -20,136 | Administering Authority | -21,243 |
| -4,516 | Other scheduled bodies | -5,410 |
| -377 | Community admission body | -504 |
| -429 | Transferee admission bodies | -856 |
| -25,458 | | -28,013 |

By type

| 2013/14 | | 2014/15 |
|----------------|---|----------------|
| £'000 | | £'000 |
| -6,316 | Employees' normal contributions | -6,561 |
| -19,142 | Employers' normal contributions | -17,518 |
| 0 | Employers' deficit recovery contributions | -3,934 |
| -25,458 | | -28,013 |

NOTE 7: TRANSFERS IN FROM OTHER PENSION FUNDS

| 2013/14 | | 2014/15 |
|---------------|----------------------|---------------|
| £'000 | | £'000 |
| -2,874 | Individual transfers | -1,267 |
| -2,874 | | -1,267 |

NOTE 8: BENEFITS PAYABLE

By category

| 2013/14 | | 2014/15 |
|---------------|--|---------------|
| £'000 | | £'000 |
| 23,296 | Pensions | 25,188 |
| 6,957 | Commutation and lump sum retirement benefits | 6,068 |
| 1,006 | Lump sum death benefits | 752 |
| 31,259 | | 32,008 |

By authority

| 2013/14 | | 2014/15 |
|---------------|-----------------------------|---------------|
| £'000 | | £'000 |
| 29,109 | Administering Authority | 30,268 |
| 1,459 | Other scheduled bodies | 1,398 |
| 169 | Community admission body | 203 |
| 522 | Transferee admission bodies | 139 |
| 31,259 | | 32,008 |

NOTE 9: PAYMENTS TO AND ON ACCOUNT OF LEAVERS

| 2013/14 | | 2014/15 |
|--------------|------------------------------------|--------------|
| £'000 | | £'000 |
| 17 | Refunds to members leaving service | 44 |
| 1,057 | Individual transfers | 2,222 |
| 1,074 | | 2,266 |

NOTE 10: MANAGEMENT EXPENSES

| 2013/14 | | 2014/15 |
|------------|--------------------------------|--------------|
| £'000 | | £'000 |
| 787 | Administrative costs | 1,061 |
| 0 | Investment management expenses | 4 |
| 33 | Oversight and governance costs | 30 |
| 820 | | 1,095 |

External audit fees of £21,000, the same as in the previous year, were charged.

In addition to these costs, management costs are charged direct to the investments by the Fund Managers and indirect costs are incurred through the bid-offer spread on investments sales and purchases. The latter are reflected in the cost of investment acquisitions and in the proceeds from the sales of investments (see Note 13A).

NOTE 11: INVESTMENT INCOME

| 2013/14 | | 2014/15 |
|---------------|---|----------------|
| £'000 | | £'000 |
| -3,100 | Private equity income | -5,723 |
| -1,534 | Pooled property investments | -1,940 |
| -2,772 | Pooled investments - units trusts and other managed funds | -3,200 |
| -62 | Other | 0 |
| -7,468 | | -10,863 |

NOTE 12: INVESTMENT EXPENSES

| 2013/14 | | 2014/15 |
|------------|---|------------|
| £'000 | | £'000 |
| -444 | Management fees | -181 |
| 18 | Custody fees | 1 |
| 17 | Performance monitoring service | 20 |
| 334 | Actuarial fees & investment consultancy | 273 |
| -75 | | 113 |

NOTE 13: INVESTMENTS

| Market value 31 March 14 | | Market value 31 March 15 |
|-----------------------------|--|-----------------------------|
| £'000 | | £'000 |
| | Investment assets | |
| 57,567 | Fixed interest securities | 69,247 |
| 14,468 | Index-linked securities | 17,130 |
| 387,311 | Pooled equity investments | 449,979 |
| 45,051 | Pooled property investments | 50,562 |
| 24,648 | Private equity/infrastructure | 22,954 |
| 54,520 | Alternative investments | 59,535 |
| 1,351 | Derivative contracts: forward currency | 1,459 |
| 602 | Cash deposits | 1,137 |
| 585,518 | Total investment assets | 672,003 |
| | Investment liabilities | |
| -238 | Derivative contracts: forward currency | -4,108 |
| -238 | Total investments liabilities | -4,108 |
| 585,280 | Net investment assets | 667,895 |

NOTE 13A: RECONCILIATION OF MOVEMENTS IN INVESTMENTS AND DERIVATIVES

| | Market value 31 March 14 | Purchases during the year and derivative payments | Sales during the year and derivative receipts | Change in market value during the year | Market value 31 March 2015 |
|---|-----------------------------|---|--|---|----------------------------------|
| | £'000 | £'000 | £'000 | £'000 | £'000 |
| Investment assets | | | | | |
| Fixed interest securities | 57,567 | 3,302 | -106 | 8,484 | 69,247 |
| Index-linked securities | 14,468 | 683 | -791 | 2,770 | 17,130 |
| Pooled equity investments | 387,311 | 363,811 | -357,708 | 56,565 | 449,979 |
| Pooled property investments | 45,051 | 0 | 0 | 5,511 | 50,562 |
| Private equity | 24,648 | 731 | -6,476 | 4,051 | 22,954 |
| Alternative investments | 54,520 | 27,925 | -27,924 | 5,014 | 59,535 |
| Derivative contracts:net forward currency | 1,113 | 1,282 | -1,713 | -3,331 | -2,649 |
| Cash - JP Morgan Transition | 0 | 0 | 0 | 268 | 268 |
| | 584,678 | 397,734 | -394,718 | 79,332 | 667,026 |
| Cash - BlackRock / other | 602 | -2,938 | 0 | 3,205 | 869 |
| | 602 | -2,938 | 0 | 3,205 | 869 |
| Total investment assets | 585,280 | 394,796 | -394,718 | 82,537 | 667,895 |

| | Market value 31 March 13 | Purchases during the year and derivative payments | Sales during the year and derivative receipts | Change in market value during the year | Market value 31 March 2014 |
|---|-----------------------------|---|--|---|----------------------------------|
| | £'000 | £'000 | £'000 | £'000 | £'000 |
| Investment assets | | | | | |
| Fixed interest securities | 57,527 | 2,611 | -389 | -2,182 | 57,567 |
| Index-linked securities | 14,532 | 764 | -87 | -741 | 14,468 |
| Pooled equity investments | 390,728 | 429 | -34,726 | 30,880 | 387,311 |
| Pooled property investments | 41,905 | 0 | 0 | 3,146 | 45,051 |
| Private equity | 26,328 | 0 | 0 | -1,680 | 24,648 |
| Alternative investments | 0 | 54,000 | 0 | 520 | 54,520 |
| Derivative contracts:net forward currency | -2,274 | 1,508 | -3,740 | 5,619 | 1,113 |
| | 528,746 | 59,312 | -38,942 | 35,562 | 584,678 |
| Cash - BlackRock / other | 731 | -3,375 | 476 | 2,770 | 602 |
| | 731 | -3,375 | 476 | 2,770 | 602 |
| Total investment assets | 529,477 | 55,937 | -38,466 | 38,332 | 585,280 |

NOTE 13B: ANALYSIS OF POOLED INVESTMENTS

| 31 March 14 | | | 31 March 15 |
|----------------|---------------------------|---------------------------|----------------|
| £'000 | | | £'000 |
| | UK | | |
| 57,567 | Fixed Interest Securities | Corporate | 69,247 |
| 14,468 | Index Linked Securities | Public Sector | 17,130 |
| 45,051 | Managed Funds - Property | Unit Trusts | 50,562 |
| 155,512 | Managed Funds - Other | Unitised Insurance Policy | 0 |
| 272,598 | | | 136,939 |
| | Global | | |
| 141,801 | Managed Funds - Other | Unit Trusts | 30,678 |
| 0 | Managed Funds - Other | Unitised Insurance Policy | 220,601 |
| 24,648 | Managed Funds - Other | Private Equity | 22,954 |
| 144,518 | Managed Funds - Other | Other | 258,235 |
| 310,967 | | | 532,468 |
| 583,565 | | | 669,407 |

Analysis of derivatives

Objectives and policies for holding derivatives

Most of the holding in derivatives is to hedge liabilities or hedge exposures to reduce risk in the Fund. Derivatives may be used to gain exposure to an asset more efficiently than holding the underlying asset. The use of derivatives is managed in line with the investment management agreement agreed between the Fund and the various investment managers.

In order to maintain appropriate diversification and to take advantage of overseas investment returns, a significant proportion of the Fund's equity portfolio is in overseas stock markets. To reduce the volatility associated with fluctuating currency rates, the Fund has a passive currency programme in place managed by Record Currency Management Limited. The Fund hedges 50% of the exposure in various currencies within the equities portfolio.

Open forward currency contracts

| Settlement | Currency bought | Local value | Currency sold | Local value | Asset value | liability value |
|--|-----------------|-------------|---------------|-------------|--------------|-----------------|
| | | 000 | | 000 | £'000 | £'000 |
| Up to one month | AUD | 5,591 | GBP | -2,898 | | -20 |
| Up to one month | CAD | 9,073 | GBP | -4,843 | | -16 |
| Up to one month | CHF | 6,888 | GBP | -4,825 | | -44 |
| Up to one month | EUR | 6,495 | GBP | -4,753 | | -53 |
| Up to one month | GBP | 4,495 | CHF | -6,888 | | -286 |
| Up to one month | GBP | 3,763 | HKD | -45,284 | | -172 |
| Up to one month | GBP | 5,795 | JPY | -1,070,200 | | -219 |
| Up to one month | GBP | 207 | SGD | -426 | | -2 |
| Up to one month | GBP | 23,512 | USD | -37,552 | | -1,788 |
| Up to one month | HKD | 15,098 | GBP | -1,312 | | -0 |
| Up to one month | JPY | 1,832,800 | GBP | -10,338 | | -39 |
| Up to one month | NOK | 13,708 | GBP | -1,178 | | -31 |
| Up to one month | SEK | 4,555 | GBP | -376 | | -20 |
| One to six months | GBP | 9,925 | JPY | -1,832,800 | | -394 |
| One to six months | GBP | 23,379 | USD | -36,181 | | -1,013 |
| Over six months | GBP | 24,392 | USD | -36,181 | | -11 |
| Up to one month | GBP | 2,929 | AUD | -5,591 | 51 | |
| Up to one month | GBP | 5,025 | CAD | -9,073 | 198 | |
| Up to one month | GBP | 5,090 | EUR | -6,495 | 389 | |
| Up to one month | GBP | 4,309 | JPY | -762,600 | 24 | |
| Up to one month | GBP | 1,185 | NOK | -13,708 | 39 | |
| Up to one month | GBP | 375 | SEK | -4,555 | 19 | |
| Up to one month | HKD | 30,186 | GBP | -2,531 | 92 | |
| Up to one month | SGD | 426 | GBP | -208 | 1 | |
| Up to one month | USD | 37,552 | GBP | -25,216 | 85 | |
| One to six months | GBP | 2,885 | AUD | -5,591 | 20 | |
| One to six months | GBP | 4,840 | CAD | -9,073 | 15 | |
| One to six months | GBP | 4,846 | CHF | -6,888 | 44 | |
| One to six months | GBP | 5,102 | EUR | -6,495 | 392 | |
| One to six months | GBP | 1,313 | HKD | -15,098 | 0 | |
| Over six months | GBP | 4,771 | EUR | -6,495 | 53 | |
| Over six months | GBP | 10,377 | JPY | -1,832,800 | 37 | |
| | | | | | 1,459 | -4,108 |
| Net forward currency contracts at 31 March 2015 | | | | | | -2,649 |
| Net forward currency contracts at 31 March 2014 | | | | | | 1,113 |

The following investments represent more than 5% of the net assets of the Fund

| Investment | Market value | % of | Market value | % of |
|--|------------------|---------------|------------------|---------------|
| | 31 March 2014 | total fund | 31 March 2015 | total fund |
| | £'000 | | £'000 | |
| SSGA MPF All World Equity Index Sub-Fund | 0 | 0 | 220,601 | 33 |
| BlackRock Institutional Bond Fund - Corp Bond 10 yrs A Class | 57,567 | 10 | 69,247 | 10 |
| GMO Emerging Domestic Opportunities Equity Fund | 0 | 0 | 76,541 | 11 |
| Longview Partners Invest - Global Pooled Equities FD K Class | 49,507 | 8 | 75,561 | 11 |
| Overstone Global Equity CCF (USD Class A1 Units) | 0 | 0 | 77,276 | 12 |
| Aviva Investors UK Real Estate Fund of Funds | 45,051 | 8 | 50,562 | 8 |
| SSGA MPF UK Equity Index Sub-Fund | 155,512 | 27 | 0 | 0 |
| Wellington Global Pooled Value Equity Portfolio | 113,911 | 19 | 0 | 0 |
| Fidelity Institutional Select Global Pooled Equities | 61,174 | 12 | 0 | 0 |

NOTE 13C: STOCK LENDING

Stock lending is permitted within pooled funds. At present, use of this facility is restricted to the State Street Global Advisors mandate.

The State Street lending programme covers equity and fixed income assets around the world and is designed to generate incremental returns for investors in a risk controlled manner.

The programme benefits from a counterparty default indemnity from State Street Bank & Trust Company pursuant to its Securities Lending Authorisation Agreement.

NOTE 14: FINANCIAL INSTRUMENTS

NOTE 14A: CLASSIFICATION OF FINANCIAL INSTRUMENTS

Accounting policies describe how different asset classes of financial instruments are measured, and how income and expenses, including fair value gains and losses, are recognised. The following table analyses the carrying amounts of financial assets and liabilities (excluding cash) by category and net assets statement heading. No financial assets were reclassified during the accounting period.

| Fair value through profit and loss | 31 March 2014 | | Financial liabilities at amortised cost | | 31 March 2015 | | Financial liabilities at amortised cost |
|------------------------------------|---------------|-------------|---|-----------------------------|----------------|--------------|---|
| | £'000 | £'000 | | | £'000 | £'000 | |
| Financial assets | | | | | | | |
| 57,567 | 0 | 0 | 0 | Fixed interest securities | 69,247 | 0 | 0 |
| 14,468 | 0 | 0 | 0 | Index-linked Securities | 17,130 | 0 | 0 |
| 387,311 | 0 | 0 | 0 | Pooled equity investments | 449,979 | 0 | 0 |
| 45,051 | 0 | 0 | 0 | Pooled property investments | 50,562 | 0 | 0 |
| 24,648 | 0 | 0 | 0 | Private equity | 22,954 | 0 | 0 |
| 54,520 | 0 | 0 | 0 | Alternative investments | 59,535 | 0 | 0 |
| 1,351 | 0 | 0 | 0 | Derivative contracts | 1,459 | 0 | 0 |
| 0 | 6,551 | 0 | 0 | Cash | 0 | 8,496 | 0 |
| 0 | 322 | 0 | 0 | Debtors | 0 | 485 | 0 |
| 584,916 | 6,873 | 0 | 0 | | 670,866 | 8,981 | 0 |
| Financial liabilities | | | | | | | |
| -238 | 0 | 0 | 0 | Derivative contracts | -4,108 | 0 | 0 |
| 0 | 0 | 0 | 0 | Other investment balances | 0 | 0 | 0 |
| 0 | 0 | -734 | 0 | Creditors | 0 | 0 | -894 |
| -238 | 0 | -734 | 0 | | -4,108 | 0 | -894 |
| 584,678 | 6,873 | -734 | 0 | | 666,758 | 8,981 | -894 |

NOTE 14B: NET GAINS AND LOSSES ON FINANCIAL INSTRUMENTS

| 31 March 2014 | | | 31 March 2015 | |
|---------------|--|------------------------------------|---------------|---------------|
| £'000 | | | £'000 | |
| | | Financial assets | | |
| 35,562 | | Fair value through profit and loss | | 82,395 |
| 2,770 | | Loans and receivables | | 3,473 |
| | | Financial liabilities | | |
| 0 | | Fair value through profit and loss | | -3,331 |
| 0 | | Loans and receivables | | 0 |
| 38,332 | | Total | | 82,537 |

NOTE 14C: FAIR VALUE OF FINANCIAL INSTRUMENTS AND LIABILITIES

The following table summarises the carrying values of the financial assets and financial liabilities by class of instrument compared with their fair values.

| Carrying value | | Fair value | Carrying value | | Fair value |
|----------------|----------------|------------------------------------|----------------|----------------|------------|
| 31 March 2014 | | | 31 March 2015 | | |
| £'000 | £'000 | | £'000 | £'000 | |
| | | Financial assets | | | |
| 584,916 | 584,916 | Fair value through profit and loss | 670,866 | 670,866 | |
| 6,873 | 6,873 | Loans and receivables | 8,981 | 8,981 | |
| 591,789 | 591,789 | Total financial assets | 679,847 | 679,847 | |
| | | Financial liabilities | | | |
| -238 | -238 | Fair value through profit and loss | -4,108 | -4,108 | |
| 0 | 0 | Loans and receivables | 0 | 0 | |
| -238 | -238 | Total financial liabilities | -4,108 | -4,108 | |

The authority has not entered into any financial guarantees that are required to be accounted for as financial instruments.

NOTE 14D: 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.

Level 1

Financial instruments at Level 1 are those where the fair values are derived from unadjusted quoted prices in active markets for identical assets or liabilities. Products classified as Level 1 comprise quoted equities, quoted fixed securities, quoted index linked securities and unit trusts.

Listed 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

Financial instruments at Level 2 are those where quoted market prices are not available; for example, where an instrument is traded in a market that is not considered to be active, or where valuation techniques are used to determine fair value and where these techniques 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.

Such instruments would include unquoted equity investments and hedge fund of funds, which are valued using various valuation techniques that require significant judgement in determining appropriate assumptions.

The values of the investment in private equity are based on valuations provided by the general partners to the private equity funds in which Harrow Pension Fund has invested.

These valuations are prepared in accordance with the International Private Equity and Venture Capital Valuation Guidelines, which follow the valuation principles of IFRS and US GAAP. Valuations are usually undertaken annually at the end of December. Cash flow adjustments and currency movements are used to roll forward the valuations to 31 March as appropriate.

The following tables provide an analysis of the financial assets and liabilities of the Fund grouped into Levels 1 to 3, based on the level at which the fair value is observable.

| | Quoted market price | Using observable inputs | With significant unobservable inputs | |
|---|---------------------------|-------------------------------|---|----------------|
| Values at 31 March 2015 | Level 1 £'000 | Level 2 £'000 | Level 3 £'000 | Total £'000 |
| Financial assets | | | | |
| Financial assets at fair value through profit and loss | 646,453 | 1,459 | 22,954 | 670,866 |
| Loans and receivables | 8,981 | 0 | 0 | 8,981 |
| Total financial assets | 655,434 | 1,459 | 22,954 | 679,847 |
| Financial liabilities | | | | |
| Financial liabilities at fair value through profit and loss | 0 | -4,108 | 0 | -4,108 |
| Financial liabilities at amortised cost | 0 | 0 | -894 | -894 |
| Total financial liabilities | 0 | -4,108 | -894 | -5,002 |
| Net financial assets | 655,434 | -2,649 | 22,060 | 674,845 |

| | Quoted market price | Using observable inputs | With significant unobservable inputs | |
|---|---------------------------|-------------------------------|---|----------------|
| Values at 31 March 2014 | Level 1 £'000 | Level 2 £'000 | Level 3 £'000 | Total £'000 |
| Financial assets | | | | |
| Financial assets at fair value through profit and loss | 558,917 | 1,351 | 24,648 | 584,916 |
| Loans and receivables | 6,873 | 0 | 0 | 6,873 |
| Total financial assets | 565,790 | 1,351 | 24,648 | 591,789 |
| Financial liabilities | | | | |
| Financial liabilities at fair value through profit and loss | 0 | -238 | 0 | -238 |
| Financial liabilities at amortised cost | 0 | 0 | -734 | -734 |
| Total financial liabilities | 0 | -238 | -734 | -972 |
| Net financial assets | 565,790 | 1,113 | 23,914 | 590,817 |

NOTE 15: NATURE AND EXTENT OF RISKS ARISING FROM FINANCIAL INSTRUMENTS

Risk and risk management

The Fund's primary long-term risk is that its assets will fall short of its liabilities (i.e. promised benefits payable to members). Therefore the aim of investment risk management is to minimise the risk of an overall reduction in the value of the Fund and to maximise the opportunity for gains across the whole Fund portfolio. The Fund achieves this through asset diversification to reduce exposure to market risk (price risk, currency risk and interest rate risk) and credit risk to an acceptable level. In addition, the Fund manages its liquidity risk to ensure there is sufficient liquidity to meet its forecast cash flows. The Council manages these investment risks as part of its overall Pension Fund risk management programme.

Responsibility for the Fund's risk management strategy rests with the Pension Fund Committee.

a) Market risk

Market risk is the risk of loss from fluctuations in equity and commodity prices, interest and foreign exchange rates and credit spreads. The Fund is exposed to market risk from its investment activities, particularly through its equity holdings. The level of risk exposure depends on market conditions, expectations of future price and yield movements and the asset mix.

The objective of the Fund's risk management strategy is to identify, manage and control market risk exposure within acceptable parameters, whilst optimising the return on risk.

In general, excessive volatility in market risk is managed through the diversification of the portfolio in terms of geographical and industry sectors and individual securities. To mitigate market risk, the Council and its investment advisors undertake appropriate monitoring of market conditions and benchmark analysis.

i) Other price risk

Other 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's investment managers mitigate this price risk through diversification.

ii) Other price risk – sensitivity analysis

Following analysis of historical data and expected investment return movement during the financial year, in consultation with the Fund's performance advisors, the Council has determined that the following movements in market price risk are reasonably possible for the 2015/16 reporting period:

| Assets type | Potential market movements (+/-) |
|--|----------------------------------|
| Total equities | 9.01% |
| Fixed interest & index linked securities | 8.49% |
| Alternative investments | 6.92% |
| Cash and equivalents | 0.01% |
| Pooled property investments | 2.60% |

Potential price changes are determined based on the observed historical volatility of asset class returns. 'Riskier' assets such as equities will display greater potential volatility than bonds as an example, so the overall outcome will depend largely on the Fund's asset allocations. The potential volatilities are consistent with a one standard deviation movement in the change in value of the assets over the latest three years. This can then be applied to the period end asset mix.

Had the market price of the Fund investments increased/decreased in line with the above the change in the net assets available to pay benefits would have been as follows:

| Asset type | Value as at 31 March 2015 | Percentage change | Value on increase | Value on decrease |
|--|---------------------------|-------------------|-------------------|-------------------|
| | £'000 | % | £'000 | £'000 |
| Cash and cash equivalents | 6,930 | 0.01 | 6,931 | 6,929 |
| Investment portfolio assets: | | | | |
| Total equities | 472,933 | 9.01 | 515,544 | 430,322 |
| Fixed interest & index linked securities | 86,377 | 8.49 | 93,710 | 79,044 |
| Alternative investments | 59,535 | 6.92 | 63,655 | 55,415 |
| Pooled property investments | 50,562 | 2.60 | 51,877 | 49,247 |
| Derivative contracts: net forward currency | -2,649 | 0.00 | -2,649 | -2,649 |
| Total | 673,688 | | 729,068 | 618,308 |

b) Interest rate risk

The Fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments 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's direct exposure to interest rate movements as at 31 March 2015 and 31 March 2014 is set out below.

| Asset type | As at 31 March 2015 | As at 31 March 2014 |
|---------------------------|---------------------|---------------------|
| | £'000 | £'000 |
| Cash and cash equivalents | 6,930 | 4,873 |
| Fixed interest securities | 69,247 | 57,567 |
| Total | 76,177 | 62,440 |

Interest rate risk sensitivity analysis

The Council recognises that interest rates can vary and can affect both income to the Fund and the carrying value of Fund assets, both of which affect the value of the net assets available to pay benefits.

The impact of a 1% movement in interest rates would be as follows:

| Asset type | Carrying amount as at 31 March 2015 | | Effect on asset value |
|---|---|--------------|--------------------------|
| | £'000 | +1% £'000 | -1% £'000 |
| Cash and cash equivalents | 6,930 | 0 | 0 |
| Fixed interest securities | 69,247 | -692 | 692 |
| Total change in assets available | 76,177 | -692 | 692 |

| Asset type | Carrying amount as at 31 March 2014 | | Effect on asset value |
|---|---|--------------|--------------------------|
| | £'000 | +1% £'000 | -1% £'000 |
| Cash and cash equivalents | 4,873 | 0 | 0 |
| Fixed interest securities | 57,567 | -576 | 576 |
| Total change in assets available | 62,440 | -576 | 576 |

This analysis demonstrates that changes in interest rates do not impact on the value of cash & cash equivalents balances but do affect the fair value on fixed interest securities.

Changes in interest rates affect interest income received on cash balances but have no effect on income from fixed income securities. However since the Fund's cash balances are low, the effect of interest changes is minimal.

c) 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 its global equities pooled fund investments, some of which are denominated in currencies other than sterling. To mitigate this risk, the Fund uses derivatives and hedges 50% of the overseas equity portfolio arising from the developed market currencies.

The table below provides the estimated total of the Fund's currency exposure as at 31 March 2015.

Following analysis of historical data in consultation with the Fund's performance advisors the Council considers the likely volatility associated with foreign exchange rate movements to be 3.62%

This fluctuation is based on the advisors analysis of long term historical movements in the month end exchange rates over a rolling 3 years' period.

A 3.62% strengthening/weakening of the pound against the various currencies in which the fund holds investments would increase/decrease the net assets available as follows.

| Currency Exposure - asset type | Asset Value as at 31 March 2015 | Change to net assets | |
|--------------------------------|---------------------------------|----------------------|---------|
| | | +3.62% | -3.62% |
| | £'000 | £'000 | £'000 |
| Overseas Equities | 398,206 | 412,621 | 383,791 |

d) 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 assets and liabilities.

In essence the Fund's entire investment portfolio is exposed to some form of credit risk, with the exception of the derivatives positions. However the selection of high quality counterparties, brokers and financial institutions by Fund managers should minimise the credit risk that may occur.

Cash deposits are not made with banks and financial institutions unless they are rated independently and meet the Council's credit criteria.

The Council believes it has managed its exposure to credit risk, and has had no experience of default or uncollectable deposits over the past five years.

The Fund's cash holding at 31 March 2015 was £6.9m (31 March 2014: £4.9m). This was held with the following institutions.

| Summary | Balances at 31 March 2015 | Balances as 31 March 2014 |
|------------------------|------------------------------|------------------------------|
| | £'000 | £'000 |
| Bank accounts | | |
| Royal Bank of Scotland | 4,633 | 530 |
| JP Morgan | 1,432 | 3,741 |
| BlackRock | 865 | 602 |
| | 6,930 | 4,873 |

e) Liquidity risk

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Council therefore takes steps to ensure that the Pension Fund has adequate cash resources to meet its commitments.

The Council has immediate access to its Pension Fund cash holdings.

The Fund considers liquid assets to be those that can be converted to cash within three months. Illiquid assets are those assets which will take longer than three months to convert in to cash. As at 31 March 2015 the value of illiquid assets was £73.5m, which represented 11% of the total Fund assets (31 March 2014: £69.7m, which represented 12% of the total Fund assets).

All financial liabilities at 31 March 2015 are due within one year.

f) Refinancing risk

The Pension Fund does not have any financial instruments that have a refinancing risk.

NOTE 16: FUNDING ARRANGEMENTS

In line with The Local Government Pension Scheme Regulations 2013, the Fund's actuary undertakes a Funding valuation every three years for the purpose of setting employer contribution rates for the forthcoming triennial period. The last such valuation took place as at 31 March 2013. The next valuation will take place as at 31 March 2016.

The key elements of the Funding policy are:

- to ensure the long-term solvency of the Fund, i.e. that sufficient funds are available to meet all pension liabilities as they fall due for payment;
- to ensure that employer contribution rates are as stable as possible;
- to minimise the long-term cost of the Scheme by recognising the link between assets and liabilities and adopting an investment strategy that balances risk and return;
- to reflect the different characteristics of employing bodies in determining contribution rates where the administering authority considers it reasonable to do so; and
- To use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations.

The aim is to achieve 100% solvency over a period of 20 years and to provide stability in employer contribution rates by spreading any increases in rates over a period of time. Normally this is three years but in some cases a maximum period of 12 years can be granted. Solvency is achieved when the funds held, plus future expected investment returns and future contributions, are sufficient to meet expected future pension benefits payable.

At the 2013 actuarial valuation, the Fund was assessed as 70.3% funded (73.5% at the March 2010 valuation). This corresponded to a deficit of £234m (2010 valuation: £157m) at that time.

For most employers within the Fund, contribution increases were phased in over the 3 years' period ending 31 March 2017.

Individual employers' rates vary depending on the demographic and actuarial factors particular to each employer. Full details of the contribution rates payable can be found in the 2013 actuarial valuation report on the Fund's website.

The valuation of the Fund has been undertaken using the projected unit method under which the salary increase for each member is assumed to increase until they leave active service by death, retirement or withdrawal from service. The principal assumptions were as follows:

Financial assumptions

| | |
|----------------------------|------|
| Price inflation (CPI) | 2.5% |
| Salary increases | 3.8% |
| Pension increases | 2.5% |
| Gilt based discount rate | 3.0% |
| Funded basis discount rate | 4.6% |

Mortality assumptions

The life expectancy assumptions are based on the Fund's Hymans Robertson's VitaCurves with improvements in line with the CMI 2010 model, assuming the current rate of improvements has reached a peak and will converge to a long term rate of 1.25% per annum.

Future life expectancy based on the actuary's Fund-specific mortality review was as follows.

| | Male | Female |
|--------------------|------------|------------|
| Current pensioners | 22.1 years | 24.4 years |
| Future pensioners | 24.5 years | 26.9 years |

Commutation assumption

It is assumed that 50% of future retirees will elect to exchange pension for additional tax free cash up to HMRC limits for service to 1 April 2008 and 75% for service from 1 April 2008.

NOTE 17: ACTUARIAL PRESENT VALUE OF PROMISED RETIREMENT BENEFITS

In addition to the triennial funding valuation, the Fund's actuary also undertakes a valuation of the Pension Fund liabilities, on an IAS 19 basis, every year using the same base data as the funding valuation rolled forward to the current financial year, taking account of changes in membership numbers and updating assumptions to the current year. This valuation is not carried out on the same basis as that used for setting Fund contribution rates and the Fund accounts do not take account of liabilities to pay pensions and other benefits in the future.

In order to assess the value of the benefits on this basis, the actuary has updated the actuarial assumptions (set out below) from those used for funding purposes (see Note 16). The actuary has also valued ill health and death benefits in line with IAS 19.

Calculated on an IAS 19 basis, the actuarial present value of promised retirement benefits at 31 March 2015 was £959m (31 March 2014: £824m). The net assets available to pay benefits as at 31 March 2015 was £602m (31 March 2014: £528m). The implied Fund deficit as at 31 March 2015 was therefore £357m (31 March 2014: £296m).

As noted above, the liabilities above are calculated on an IAS 19 basis and therefore will differ from the results of the 2013 triennial funding valuation because IAS 19 stipulates a discount rate rather than a rate which reflects market rates.

Assumptions used

| | |
|--|------|
| Inflation/pension increase rate assumption | 2.4% |
| Salary increase rate | 3.8% |
| Discount rate | 3.2% |

NOTE 18: CURRENT ASSETS

| 31 March 2014 | | 31 March 2015 |
|---------------|--------------------------------------|---------------|
| £'000 | | £'000 |
| | Debtors: | |
| 283 | Contributions due - employers | 381 |
| 0 | Transfer values receivable (joiners) | 79 |
| 39 | Sundry debtors | 25 |
| 1,678 | Cash owed to Fund | 1,566 |
| 2,000 | | 2,051 |

Analysis of debtors

| 31 March 2014 | | 31 March 2015 |
|---------------|--------------------------------|---------------|
| £'000 | | £'000 |
| 1,678 | Other local authorities | 1,645 |
| 0 | NHS bodies | 4 |
| 283 | Scheduled/Admitted bodies | 381 |
| 39 | Other entities and individuals | 21 |
| 2,000 | | 2,051 |

NOTE 19: CURRENT LIABILITIES

| 31 March 2014 | | 31 March 2015 |
|---------------|-----------------------------------|---------------|
| £'000 | | £'000 |
| -580 | Sundry creditors | -355 |
| 0 | Transfer values payable (leavers) | -212 |
| -154 | Benefits payable | -327 |
| -734 | | -894 |

Analysis of creditors

| 31 March 2014 | | 31 March 2015 |
|---------------|--------------------------------|---------------|
| £'000 | | £'000 |
| -288 | Central government bodies | -4 |
| 0 | Other local authorities | -212 |
| -446 | Other entities and individuals | -678 |
| -734 | | -894 |

NOTE 20: ADDITIONAL VOLUNTARY CONTRIBUTIONS

The Fund provides an additional voluntary contributions (AVC) Scheme for its members, the assets of which are invested separately from those of the Fund. The Fund has appointed Prudential, Clerical Medical and Equitable Life as its AVC providers. AVCs are paid to the AVC provider by employees and are specifically for providing additional benefits for individual contributors. Each AVC contributor receives an annual statement showing the amount held in their account and the movements in the year.

AVCs are not included in the accounts in accordance with section 4(2)(b) of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 (SI 2009/3093) but are disclosed as a note only.

AVC contributions of £0.36m were paid directly to the providers during the year (2013/14: £0.37m)

| Market value 31 March 2014 | | Market value 31 March 2015 |
|-------------------------------|----------------------------------|-------------------------------|
| £'000 | | £'000 |
| 1,128 | Prudential Assurance | 1,208 |
| 996 | Clerical Medical | 812 |
| 286 | Equitable Life Assurance Society | 266 |
| 2,410 | | 2,286 |

NOTE 21: RELATED PARTY TRANSACTIONS

Harrow Council

The Fund is required under IAS24 to disclose details of material transactions with related parties. The Council is a related party to the Pension Fund. Details of the contributions made to the Fund by the Council and expenses refunded to the Council are set out above.

The Pension Fund has operated a separate bank account since April 2011. However, due to the ease of administration and to avoid any undue cost to the Fund some transactions continue to be processed through the Council's bank account and as such these balances are settled on a monthly basis.

| 31 March 2014 | | 31 March 2015 |
|---------------|--|---------------|
| £'000 | | £'000 |
| -15,042 | Employer's Pension Contributions to the Fund | -16,162 |
| 787 | Administration expenses paid to the Council | 1,061 |
| 1,678 | Cash held by the Council | 1,566 |

Governance

Each member of the Pension Fund Committee is required to declare their interests at each meeting.

Key management personnel

Paragraph 3.9.4.3 of the Code exempts local authorities from the key management personnel disclosure requirements of IAS 24, on the basis that the disclosure requirements for officer remuneration and members' allowances detailed in section 3.4 of the Code (which are derived from the requirements of Regulation 7(2)–(4) of The Accounts and Audit (England) Regulations 2011 and Regulation 7A of The Accounts and Audit (Wales) Regulations 2005) satisfy the key management personnel disclosure requirements of paragraph 16 of IAS 24. This applies in equal measure to the accounts of the Harrow Pension Fund.

The disclosures required by Regulation 7(2)–(4) of The Accounts and Audit (England) Regulations can be found in the main accounts of Harrow Council.

NOTE 22: CONTINGENT LIABILITIES AND CONTRACTUAL COMMITMENTS

Outstanding capital commitments at 31 March 2015 totalled £4.5m (31 March 2014: £5.1m).

These commitments relate to outstanding call payments due on unquoted limited partnership Funds held by Pantheon Ventures in the private equity part of the portfolio.

NOTE 23: CONTINGENT ASSETS

Six admitted body employers in the Fund hold insurance bonds or guarantees to guard against the possibility of being unable to meet their pension obligations. These bonds are drawn in favour of the Fund and payment will only be triggered in the event of employer default.

London Borough of Harrow Pension Fund (“the Fund”) Actuarial Statement for 2014/15

This statement has been prepared in accordance with Regulation 57(1)(d) of the Local Government Pension Scheme Regulations 2013, and Chapter 6 of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the UK 2014/15. This statement is in respect of the London Borough of Harrow Pension Fund (“The Fund”) which is administered by Harrow Council (“the Administering Authority”).

Description of Funding Policy

The funding policy is set out in the Administering Authority’s Funding Strategy Statement (FSS), dated March 2014. In summary, the key funding principles are as follows:

- to ensure the long-term solvency of the Fund, using a prudent long term view. This will ensure that sufficient funds are available to meet all members’/dependants’ benefits as they fall due for payment;
- to ensure that employer contribution rates are reasonably stable where appropriate;
- to minimise the long-term cash contributions which employers need to pay to the Fund, by recognising the link between assets and liabilities and adopting an investment strategy which balances risk and return (NB this will also minimise the costs to be borne by Council Tax payers);
- to reflect the different characteristics of different employers in determining contribution rates. This involves the Fund having a clear and transparent funding strategy to demonstrate how each employer can best meet its own liabilities over future years; and
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations.

The FSS sets out how the Administering Authority seeks to balance the conflicting aims of securing the solvency of the Fund and keeping employer contributions stable. For employers whose covenant was considered by the Administering Authority to be sufficiently strong, contributions have been stabilised below the theoretical rate required to return their portion of the Fund to full funding over 20 years if the valuation assumptions are borne out. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is still a better than 50% chance that the Fund will return to full funding over 20 years.

Funding Position as at the last formal funding valuation

The most recent actuarial valuation carried out under Regulation 36 of the Local Government Pension Scheme (Administration) Regulations 2008 was as at 31 March 2013. This valuation revealed that the Fund’s assets, which at 31 March 2013 were valued at £552 million, were sufficient to meet 70% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. The resulting deficit at the 2013 valuation was £234 million.

Individual employers’ contributions for the period 1 April 2014 to 31 March 2017 were set in accordance with the Funding Strategy Statement.

Principal Actuarial Assumptions and Method used to value the liabilities

Full details of the methods and assumptions used are described in the valuation report dated 28 March 2014.

HYMANS ROBERTSON LLP

Method

The liabilities were assessed using an accrued benefits method which takes into account pensionable membership up to the valuation date, and makes an allowance for expected future salary growth to retirement or expected earlier date of leaving pensionable membership.

Assumptions

A market-related approach was taken to valuing the liabilities, for consistency with the valuation of the Fund assets at their market value.

The key financial assumptions adopted for the 2013 valuation were as follows:

| Financial assumptions | 31 March 2013 | |
|-----------------------------------|----------------|-------------|
| | % p.a. Nominal | % p.a. Real |
| Discount rate | 4.60% | 2.10% |
| Pay increases | 3.80% | 1.30% |
| Price inflation/Pension increases | 2.50% | - |

The key demographic assumption was the allowance made for longevity. The life expectancy assumptions are based on the Fund's VitaCurves with improvements in line with the CMI 2010 model, assuming the current rate of improvements has reached a peak and will converge to a long term rate of 1.25% p.a.. Based on these assumptions, the average future life expectancies at age 65 are as follows:

| | Males | Females |
|--------------------|------------|------------|
| Current Pensioners | 22.1 years | 24.4 years |
| Future Pensioners* | 24.5 years | 26.9 years |

*Future pensioners were assumed to be aged 45 as at the last formal valuation date.

Copies of the 2013 valuation report and Funding Strategy Statement are available on request from, the Administering Authority.

HYMANS ROBERTSON LLP

Experience over the period since April 2013

Real bond yields have fallen dramatically since the valuation, placing a higher value on liabilities. Strong asset returns have partially offset this. In aggregate, deficits are likely to have increased since the 2013 valuation.

The next actuarial valuation will be carried out as at 31 March 2016. The Funding Strategy Statement will also be reviewed at that time.



Gemma Sefton FFA

Fellow of the Institute and Faculty of Actuaries
For and on behalf of Hymans Robertson LLP
8 May 2015

Hymans Robertson LLP
20 Waterloo Street
Glasgow

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Governance Compliance Statement

London Borough of Harrow Pension Fund

June 2015

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Introduction

This is the Governance Compliance Statement of The London Borough of Harrow Pension Fund, administered by Harrow Council, the Administering Authority. The Statement provides an overview of Harrow's approach towards the governance of the Pension Fund.

Any enquiries in relation to this Governance Compliance Statement should be sent to:

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Harrow Council

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Civic Centre

Station Road

Harrow

HA1 2XF

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Fax: 0208 424 1196

Email: linda.d'souza@harrow.gov.uk



Regulatory Framework

This Compliance Statement is required by Regulation 55 of the Local Government Pension Scheme Regulations 2013.

The Regulation requires Harrow Council as the Administering Authority to prepare a written statement setting out: -

- (a) whether the authority delegates its function, or part of its functions under these Regulations to a committee, a sub-committee or an officer of the authority;*
- (b) if the authority does so—*
 - (i) the terms, structure and operational procedures of the delegation,*
 - (ii) the frequency of any committee or sub-committee meetings,*
 - (iii) whether such a committee or sub-committee includes representatives of Scheme employers or members, and, if so, whether those representatives have voting rights;*
- (c) the extent to which a delegation, or the absence of a delegation, complies with guidance given by the Secretary of State and, to the extent it does not so comply, the reasons for not complying, and*
- (d) details of the terms, structure and operational procedures relating to the local pension board established under regulation 53(4) (Scheme managers).*

This Statement will be revised and republished following any material change on any of the matters set out above. A current version of the Statement will always be available either through the pensions unit at the address on page three and on the Pension Fund website www.harrowpensionfund.org

Delegated Functions

Harrow Council has delegated its functions to the following:

- i) Pension Fund Committee
- ii) Officer Sub – Group
- iii) Divisional Director HR and OD
- vi) Director of Finance
- vii) Chief Officers

Pension Fund Committee

The Pension Fund Committee comprises four Members representing two different political parties with voting rights, and one co-optee, two Independent Advisors and an Investment Advisor all without voting rights. Council Senior Officers attend each meeting and Trade Union representatives of Scheme members (UNISON and GMB) are also invited as observers.

The Committee meets approximately four times a year and has the following responsibilities:

- ❑ to exercise on behalf of the Council, all the powers and duties of the Council in relation to its functions as Administering Authority of the LB Harrow Pension Fund (the fund), save for those matters delegated to other Committees of the Council or to an Officer;
- ❑ the determination of applications under the Local Government Superannuation Regulations and the Teachers' Superannuation Regulations;
- ❑ to administer all matters concerning the Council's pension investments in accordance with the law and Council policy;
- ❑ to establish a strategy for the disposition of the pension investment portfolio; and
- ❑ to appoint and determine the investment managers' delegation of powers of management of the fund;

- ❑ to determine cases that satisfy the Early Retirement provision under Regulation 26 of the Local Government Pension Scheme Regulations 1997(as amended), and to exercise discretion under Regulations 8 of the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2000 (as amended, subject to the conditions now agreed in respect of all staff, excluding Chief Officers;
- ❑ to apply the arrangements set out in (6) above to Chief Officers where the application has been recommended by the Chief Executive, either on the grounds of redundancy, or in the interests of the efficiency of the service, and where the application was instigated by the Chief Executive in consultation with the leaders of the political groups.

Within its Terms of Reference, the Committee therefore carries out functions such as:

- ❑ provide a response to any draft LGPS amendment regulations or other discussion paper relating to the LGPS.
- ❑ In some instances, decide to whom a death grant is paid.
- ❑ consider policy matters in relation to the pension scheme and the Council's early retirement policy.
- ❑ at least once every three months, review the investments made by the Fund Managers and from time to time consider the desirability of continuing or terminating the appointment of the Fund Managers.
- ❑ receive actuarial valuations of the Fund.

Officer Sub – Group

The Officer Sub – Group is comprised of three Officers representing Finance, Legal and HR. Council Senior Officers attend each meeting.

The Sub-Group meets on an ad-hoc basis and have the following responsibilities:

- ❑ To determine all early retirement applications in line with Council Policy

Divisional Director HR and OD

The Senior HR Officer (currently Divisional Director HRD & Shared Services) has the following responsibility:

- To determine flexible retirement applications where there is no cost to the pension fund.

Director of Finance

Pension Fund Investment

In respect of the discretionary management arrangements the Director of Finance and Assurance has the following responsibilities:

- In the name of the Mayor and Burgesses of Harrow Council and on behalf of the Pension Fund and in consultation with the Fund's managers, to invest in stocks and shares as authorised by the Trustee Investments Act and Pension Fund Regulations, and to authorise the Council's seal to be affixed to stock transfer forms, rights issues and other investment forms.
- To enter into agreements on the terms and conditions on which these investments are made by the Fund's managers.
- To enter into under-writing agreements.
- To monitor the investment decisions of the Fund managers and under the terms of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 to ensure the need for diversification and stability of investments

Chief Officers

Chief Officers may be specifically authorised to take decisions on behalf of the Council or a Committee in cases of urgency or in relation to minor matters. In doing so the procedure set out below must be followed.

Urgent Non-Executive Decisions and Minor Matters

In relation to matters which are the responsibility of a Council Committee, subject to consultation with the Chair of the relevant committee and the nominated members of the political groups or their nominees, Chief Officers shall have the power to act on behalf of the Council in cases of urgency and on minor matters, where the urgent matter is of such a nature that it may be against the Council's interest to delay and where it is not practicable to obtain the approval of the Council Committee. In the event of disagreement between the Members consulted, the matter shall be referred to the Head of Paid Service who may take the decision after consultation with the Leaders of all political groups or their nominees, and if appropriate, with the statutory officers. The safeguards set out below must be followed.

Safeguards

The procedure must only be used when considered essential to achieving the efficient administration of the service and for urgent matters consideration must be given to whether the matter can wait until the next scheduled meeting or whether the calling of a special meeting can be justified.

All decisions taken by officers under this delegated power must be reported for information to the next meeting of the appropriate committee.

Local Pension Board

A local Pension Board will be in place by April 2015.

The role of the Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013, is to assist the Administering Authority (London Borough of Harrow) as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including:

- securing compliance with the LGPS regulations and other legislation relating to the governance and administration of the LGPS;
- securing compliance with requirements imposed in relation to the LGPS by the Pensions Regulator; and
- such other matters the LGPS regulations may specify.



The Administering Authority retains ultimate responsibility for the administration and governance of the scheme. The role of the Board is to support the Administering Authority to fulfil that responsibility.

In its role, The Board will have oversight of the administration of the fund including:

- a) The effectiveness of the decision making process
- b) The direction of the Fund and its overall objectives
- c) The level of transparency in the conduct of the Fund's activities
- d) The administration of benefits and contributions

Statement of compliance to guidance

Regulation 55(1)(c) requires LGPS administering authorities to measure their governance arrangements against the principles set out in the statutory guidance. Where compliance does not meet the published standard, there is a requirement to give, in their governance compliance statement, the reasons for not complying.

Principle A – Structure

- a) The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.
- b) 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.
- c) That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.
- d) 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 Compliant | | | Fully Compliant | |
|----|---------------|--|---|-----------------|----|
| a) | | | | | √ |
| b) | | | √ | | |
| c) | | | | | NA |
| d) | | | | | NA |

Reason for non-compliance.

There is no representation of non-Council employers or scheme members at the Pension Fund Committee. However, scheduled and admitted bodies are consulted on specific issues and representatives of two trade unions are entitled to attend all meetings as observers.

Principle B – Representation

- a) 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, eg, 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).

b) 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 Compliant* | | | Fully Compliant | |
|----|----------------|--|--|-----------------|---|
| a) | | | | √ | |
| b) | | | | | √ |

Reason for non-compliance.

There is no representation of non-Council employers or scheme members at the Pension Fund Committee. However, scheduled and admitted bodies are consulted on specific issues and representatives of two trade unions are entitled to attend all meetings as observers.

Principle C – Selection and role of lay members

a) 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.

b) 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.

| | Not Compliant* | | | Fully Compliant | |
|----|----------------|--|--|-----------------|---|
| a) | | | | | √ |
| b) | | | | | √ |

Principle D – Voting

a) 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.

| | Not Compliant* | | | Fully Compliant | |
|----|----------------|--|--|-----------------|---|
| a) | | | | | √ |

Principle E – Training/Facility time/Expenses

a) 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.

b) 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.

c) That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken



| | Not Compliant* | | | | Fully Compliant |
|----|----------------|--|--|--|-----------------|
| a) | | | | | √ |
| b) | | | | | √ |
| c) | | | | | √ |

Principle F – Meetings (frequency/quorum)

- a) That an administering authority’s main committee or committees meet at least quarterly.
- b) 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.
- c) That an administering authority who does 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

| | Not Compliant* | | | | Fully Compliant |
|----|----------------|--|--|--|-----------------|
| a) | | | | | √ |
| b) | | | | | NA |
| c) | | | | | √ |

Principle G – Access

- a) 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.

| | Not Compliant* | | | | Fully Compliant |
|----|----------------|--|--|--|-----------------|
| a) | | | | | √ |

Principle H – Scope

- a) That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements

| | Not Compliant* | | | | Fully Compliant |
|----|----------------|--|--|--|-----------------|
| a) | | | | | √ |

Principle I – Publicity

- a) 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.

| | Not Compliant* | | | | Fully Compliant |
|----|----------------|--|--|--|-----------------|
| a) | | | | | √ |

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GOVERNANCE COMPLIANCE STATEMENT

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APPENDIX 2

Communications Policy Statement

London Borough of Harrow Pension Fund

April 2015

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Introduction

This is the Communications Policy Statement of the Harrow Council Pension Fund, administered by Harrow Council, the Administering Authority.

The Fund liaises with a number of employers, namely:-

- ❖ **Alexandra Academy**
- ❖ **Avanti House Free School**
- ❖ **Aylward Academy**
- ❖ **Bentley Wood Academy**
- ❖ **Birkin**
- ❖ **Canons High Academy**
- ❖ **Capita Business Services**
- ❖ **Carillion Services**
- ❖ **Chartwells**
- ❖ **Govindas**
- ❖ **Granary Kids**
- ❖ **Harrow Academy**
- ❖ **Harrow College**
- ❖ **Hatch End Academy**
- ❖ **Heathland and Whitefriars Academy**
- ❖ **Jubilee Academy**
- ❖ **Julius Rutherford**
- ❖ **Krishna Avanti Academy**
- ❖ **Linbrooks**
- ❖ **North London Collegiate School**
- ❖ **Nower Hill Academy**
- ❖ **Park Academy**
- ❖ **Rooks Heath Academy**
- ❖ **Salvatorian College**
- ❖ **St. Dominic's VI Form College**
- ❖ **Stanmore College**
- ❖ **Taylor Shaw**
- ❖ **Temco**

and approximately 17,143 scheme members (5,526 active members, 6,323 deferred members and 5,294 pensioner members) in relation to the Local Government Pension Scheme. The delivery of the benefits involves communication with a number of other interested parties. This statement provides an overview of how we communicate and how we intend to measure whether our communications are successful.

It is effective from 1 April 2015.

Any enquiries in relation to this Communication Policy Statement should be sent to:

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Harrow
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email: linda.d'souza@harrow.gov.uk

Regulatory Framework

This policy statement is required by the provisions of Regulation 61 of the Local Government Pension Scheme Regulations 2013. The provision requires Harrow Council as the Administering Authority to:

“...prepare, maintain and publish a written statement setting out its policy concerning communications with:

- (a) members.*
- (b) representatives of members.*
- (c) prospective members and*
- (d) Scheme employers.”*

In addition it specifies that the statement must include information relating to:

- “(a) the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers;*
- (b) the format, frequency and method of distributing such information or publicity; and*
- (c) the promotion of the Scheme to prospective members and their employers.”*

As a provider of an occupational pension scheme, Harrow Council is already obliged to satisfy the requirements of the Occupational Pension Schemes (Disclosure of information) Regulations and other legislation, for example the Pensions Act 2014. Previously the disclosure requirements have been prescriptive, concentrating on timescales rather than quality. From 6 April 2006 more generalised disclosure requirements were introduced, supported by a Code of Practice. While the Code itself is not a statement of the law, and no penalties can be levied for failure to comply with it, the Courts or a tribunal must take account of it when determining if any legal requirements have not been met. A summary of our expected timescales for meeting the various disclosure of information requirements are set out in the Performance Management section of this document.

Responsibilities and Resources

The legal duty for the proper administration of the Harrow Council Pension Fund lies with Harrow Council. Communication material is raised through the Pensions Team and validated through the Harrow Communications Unit. The Team write all communications including information published on the Internet/Intranet. The team is also responsible for arranging all forums, pension surgeries, workshops and meetings covered within this statement. The Team report through the recognised organisational unit hierarchical structure, ultimate responsibility for ensuring compliance lies with the Divisional Director of HR and OD.

Printing documentation is carried out internally.

Communication with key audience groups

Our audience

The Pensions Team communicates with a number of stakeholders on an on-going basis. For the purpose of this communication policy statement, the team are considering engagement with the following audience groups:

- active members;
- deferred members;
- pensioner members;
- debit / credit members;
- prospective members;
- scheme employers and admission bodies;
- union representatives;
- Elected Members;
- chief officers
- pensions administration staff

In addition there are a number of other stakeholders with whom Harrow Council communicate on a regular basis, such as Her Majesty's Revenue and Customs, Communities & Local Government, Department of Works and Pensions, Pensions Advisory Service, Solicitors, actuaries and other pension providers. Harrow Council has also considered, as part of this policy, how it communicates/engages with these interested parties.

How we communicate

General communication

Harrow Council has set in place a number of initiatives that will assist in moving towards the Government's e-gov agenda. Pension information, for the most part, is delivered through paper based communications. Harrow has put in place alternative communication mediums (e.g. documents in Braille, large print, audio tapes, etc) to ensure that it caters for the needs of special groups. Additionally Harrow utilises Internet/Intranet mediums and is currently investigating, in consultation with Harrow's Audit unit, both email and internet self-service as mediums that will facilitate a gradual move away from paper communications and reduce communication costs.

Within the pension team, staff are responsible for all administration of the Local Government Pension Scheme. Any member of staff within the team can deal with general telephone calls, written correspondence or visitors. Communications of more complicated pension issues are managed amongst the Pensions senior management.

Telephony feed is either through a dedicated direct dial number or alternatively directly to the main Harrow Council switchboard and then onward transfer to one of the pension teams' extensions.

Branding

As the Pension Fund is administered by Harrow Council, all literature and communications will conform to the Council's branding policy.

Accessibility

Harrow Council serves a culturally rich and diverse client base and is conscious of the fact that access to information requires varied forms of communication. Any material required in an alternative format or language is managed in line with a specific request. All publications include details of how a request for alternative communication format is requested.

Policy on Communication with Active, Deferred and Pensioner Members

Our objectives with regard to communication with members are:

Key communication objectives will, over and above individual communications with members (e.g. notification of scheme benefits, response to an individual enquiries, etc), be managed as detailed below:

- for the LGPS to be used as a tool in the recruitment and retention of employees, and therefore assisting in both Harrow Council and associated bodies becoming employers of choice.
- to better educate and explain to members the benefits of the LGPS.
- to provide the diverse client base with increased opportunity to engage on pension related matters through the most appropriate medium.
- as a result of improved communication, for enquires and complaints to be resolved at the earliest opportunity and to the client's satisfaction.
- In line with the Government's agenda in relation to individuals making adequate financial arrangements for retirement, increase take up of LGPS membership.
- to ensure that all stakeholders, whether they be active members, pensioners or Elected Members have sufficient material to hand to inform pension-related judgements.

| <i>Method of Communication</i> | <i>Media</i> | <i>Frequency of issue</i> | <i>Method of Distribution</i> | <i>Audience Group (Active, Deferred, Pensioner or All)</i> |
|----------------------------------|--|--|--|--|
| Scheme Guide | Paper based and through Harrow's Internet/Intranet | At joining and major scheme changes | Post to home address/via scheme employers & online | Active |
| Newsletters | Paper based and through Harrow's Internet/Intranet | Annually and ad hoc to reflect timely notification of major scheme changes | Post to home address & online | Separately for active, deferred and pensioners |
| Pension Fund Report and Accounts | Paper based and through Harrow's Internet/Intranet | Annually | Hard copy on request & online | All |
| Pension Fund Accounts – | Paper based and through Harrow's | Annually | Post to home | Separately for active and |

| | | | | |
|-------------------------------|--|-----------------------------------|-------------------------------|---------------------|
| Summary | Internet/Intranet | | address.& online | deferred |
| Annual Benefit Statements | Paper based | Annually | Post to home address | Active and deferred |
| Factsheets | Paper based and through Harrow's Internet/Intranet | Topic specific information sheets | Post to home address & online | Active and deferred |
| Website – Harrow Intranet | Electronic | Continually available | Loaded for key communications | All |
| Pension Surgeries | Face to face | On request | On request | Active |
| One to one education sessions | Personal interview | On request | On request | All |
| Question and Answer sessions | Paper based, Harrow Intranet & seminars | Quarterly | Various | Active |

Explanation of communications

Scheme Guide - A booklet providing a relatively detailed overview of the LGPS, including who can join, how much it costs, the retirement and death benefits and how to increase the value of benefits.

Newsletters - An annual newsletter which provides updates in relation to changes to the LGPS as well as other related news, such as European / British pension matters, payroll pay dates/deadlines, a summary of the accounts for the year, contact details, etc.

Pension Fund Report and Accounts – Details of the value of the Pension Fund during the financial year, income and expenditure as well as other related details, (e.g. current employer bodies and scheme membership numbers. This is a somewhat detailed and lengthy document and, therefore, it will not be routinely distributed except on request. A summary document, as detailed below, will be distributed.

Pension Fund Report and Accounts Summary – provides a handy summary of the position of the Pension Fund during the financial year, income and expenditure as well as other related details.

Annual Benefit Statements – For active members these include the current value of benefits to 31 March as well as the projected benefits at Normal Pension Age. The associated death benefits are also shown as well as details of any individuals the member has nominated to receive the lump sum death grant. The annual benefit statement is a combined publication and includes the members' state benefits as advised through the Department for Works and Pensions.

For 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.

Fact sheets – These are leaflets that provide some detail in relation to specific topics, such as topping up pension rights, death benefits and pension rights on divorce etc.

Harrow Intranet – The Intranet will provide scheme specific information, forms that can be printed or downloaded, access to documents (e.g. newsletters and report and accounts), frequently asked questions and answers, links to related sites and contact information.

Harrow website – The website also provides scheme specific information, forms that can be printed or downloaded, access to documents (e.g. newsletters and report and accounts), frequently asked questions and answers, links to related sites and contact information.

Pension Surgeries – Pension surgeries provide the opportunity for groups of staff (i.e. 6 or more) to arrange a personal visit, at their place of work, from a member of the team.

One to one education sessions – These sessions offer the individual a confidential interview with a member of the team.

Policy on promotion of the scheme to Prospective Members and their Employing Bodies

Our objectives with regard to communication with prospective members are:

- for the LGPS to be used as a tool in the recruitment of employees, and therefore assisting in both Harrow Council and associated bodies becoming employers of choice.
- to better educate and explain to members the benefits of the LGPS.
- to provide the diverse prospective client base with increased opportunity to engage on pension related matters through the most appropriate medium.
- In line with the Government's agenda in relation to individuals making adequate financial arrangements for retirement, increase take up of LGPS membership.
- to ensure that prospective members have sufficient material to hand to inform pension-related judgements.

The Pensions Office does not have immediate access to prospective members, however, the benefits of a defined benefit scheme is referenced in job vacancy advertisements. Promotional material and educational visits are provided for employing bodies.

| Method of Communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|--------------------------------|---------------------------|---------------------------|-------------------------------|---|
| Overview of the LGPS - Guide | Paper based, and Internet | On commencing employment | Via employers | New employees |
| Promotional Brochure | Paper based | Annually | Via employers | Existing/New employees |
| Membership Specific Reminder | Electronic | Annually | Harrow communications | Current Non LGPS Harrow Council employees |

Explanation of communications

Overview of the LGPS – Guide - A short leaflet that summarises the costs of joining the LGPS and the benefits of doing so. All this information is available on Harrow’s Internet pages.

Promotional Brochure – These will be designed to help those who are not in the LGPS to understand the benefits of participating in the scheme and provide guidance on how to join the scheme.

Membership Specific Reminder – Through a combination of individual letter and promotional brochure provide current Harrow Council employees, who have not joined the LGPS, with sufficient information to revisit their earlier decision.

Policy on communication with Employing Bodies

Our objectives with regard to communication with employers are:

- to establish sound working arrangements to assist with a free flow of relevant information.
- Given the increased costings associated with funding a defined benefit scheme, provide the employing bodies with sufficient information to assist them in their planning for future employer contribution rates.
- to provide a database infrastructure that will assist in maintaining an accurate database.
- To provide literature and processes around starters, changes during employment, leavers, retirees thereby ensuring smooth data transfers in relation to all staffing issues.
- to ensure they understand the benefits of being an LGPS employer.
- to assist the employing body in the development of their discretionary policy.

Our objectives will be met by providing the following communications:

| Method of Communication | Media | Frequency of issue | Method of Distribution | Audience Group |
|---|---|---|--|--------------------------------|
| Employers' Guide | Paper based and electronic file format | At joining and updated as necessary | Post , email and via data storage medium | Main contact for all employers |
| Newsletters | Paper based | Annually | Post & email | Main contact for all employers |
| Employers meeting | Meeting with key employing body personnel | Triennially | Meeting | Employing body management |
| | | | | |
| Harrow Pension Fund Report and Accounts | Paper based | Annually | Post | Employing body |
| IAS19 report | Paper based and electronic file format. | Annually | Hard copy post and data storage medium. | Employing Body. |
| Service Level Agreement | Paper based and electronic file format. | Start of admission agreement and revised at contract renewal. | Hard copy post and data storage medium | Admitted Body |

Explanation of communications

Employers' Guide - A detailed communication that provides guidance on the employer's duties responsibilities. Assists employer in ensuring that it meets its statutory obligations within the prescribed timescales (e.g. publication of policy on discretions).

Newsletters – A technical briefing document that will include recent changes to the scheme, the impact on Pension Section administration and other relevant information.

Employer's Meeting – A formal seminar style event where the Harrow Pension team provide an update and the employing body get to question all aspects of the support arrangements.

Harrow Pension Fund Report and Accounts Summary – provides a handy summary of the position of the Pension Fund during the financial year, income and expenditure as well as other related details.

IAS19 Report – This is a national accounting standard that all authorities administering pension funds must follow. IAS19 requires an organisation to account for retirement benefits when it is committed to give them, even if the actual giving will be many years to come.

Service Level Agreement – Document that sets out, alongside the admission agreement, the duties and responsibilities of both parties for the duration of the service contract.

Policy on communication with Union Representatives

Our objectives with regard to communication with union representatives are:

- to foster close working relationships in communicating the benefits of the scheme to union members
- to ensure they are aware of the Pension Fund’s policy in relation to any decisions that need to be taken concerning the scheme
- to engage in discussions over the future of the scheme and to ensure that Union representatives have full vision and opportunity to respond on all CLG and HMRC consultations
- to harness union communications in a joint venture to explain the benefits of the LGPS to prospective and current members
- to liaise with unions and provide every assistance in supporting union officers in their learning and understanding of the LGPS

Our objectives will be met by providing the following communications:

| Method of communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|---------------------------------|----------------------------|--|---|-------------------------------|
| Briefing papers | Paper based and electronic | As and when there are scheme changes | Email or hard copy | All union members of the LGPS |
| Education sessions | Paper based and electronic | On request or following suggestion of Harrow’s Pensions Team | Various | Union representatives |
| Pension Fund Committee meetings | Reports & Meeting | In line with published Committee meeting cycle | Notification through Committee Services | Named union representatives |

Explanation of communications

Briefing papers – a briefing that highlights key issues and developments relating to the LGPS and the Fund.

Education sessions – these are education sessions that are available on request for union representatives, [e.g. to improve their understanding of the basic principles of the scheme, or to explain possible changes to policies]

Pension Fund Committee meetings – a formal meeting of Elected Members, attended by Council Senior Officers, Investment Managers, invited Pension specialists and union members.

Policy on communication with Elected Members

Our objectives with regard to communication with Elected Members:

- to ensure that Elected Members receive sufficient briefings/training to allow them to carry out their statutory duties and responsibilities in line with HMRC and LGPS legislation.
- to seek Elected Member approval to the development or amendment of discretionary policies,
- to seek Elected Members approval to formal responses to government consultation in relation to the scheme
- to ensure that Elected Members have full vision of actuarial reports, particularly those that impact on the Harrow Pension Fund.

Our objectives will be met by providing the following communications:

| Method of Communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|--------------------------------|----------------------------|---|--|--|
| Training sessions | Pension seminars | Following member elections or timely briefings to ensure Elected Members are aware of scheme changes. | LGPS specific seminar | All Elected Members. |
| Briefing papers | Paper based and electronic | As and when required | Email or hard copy | All Elected Members |
| Pension Meetings | Meeting | In line with the published Committee cycle. | Members elected onto Licensing & General Purposes Committee and Pension Fund Committee | All members of the Pension Committee/Panel |
| Report and verbal briefing | Meeting | As and when required | Report and verbal briefing | Cabinet |

Explanation of communications

Training Sessions – providing a broad overview of the main provisions of the LGPS, and Elected Member’s key duties and responsibilities.

Briefing papers – a briefing that highlights key issues and developments to the LGPS.

Pension Meetings – Reports submitted to the Pension Fund Committee.

Report and Verbal Briefing – Occasions when The Cabinet require vision of forthcoming pension changes that could impact on Corporate Priorities or have significant budget implications.

Policy on communication with Pensions Team

Our objectives with regard to communication with pension administration staff are:

- ensure they are aware of changes and proposed changes to the LGPS scheme.
- to provide new and established staff with access to both internal and external training
- through a combination of utilising task management and re-engineering service processes continuously monitor and develop potential for service improvements; readjusting performance measures and targets, where appropriate

Our objectives will be met by providing the following communications:

| Method of Communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|--|-------------------------|---|-------------------------------|-----------------------|
| Identify training/development needs as part of Appraisal | Appraisal documentation | Annual exercise, reviewed at 6 months. Informal bi-monthly meetings | Appraisal process | All pensions staff |
| Staff meetings | Informal briefings | As and when required | By arrangement | All pensions staff |
| Attendance at external courses | Externally provided | As and when required | By email, paper based | All pensions staff |

Explanation of communications

Appraisal – Formal staff review process where future training/development needs are identified in relation to the team’s strategic priorities.

Staff meetings - Informal training sessions – which provide new and established staff with timely update on changes to pension legislation or processes and an opportunity to discuss such amendments with senior members

Attendance at external courses – to provide more tailored training where it is cost-effective to use external trainers

Policy on communication with tax payers

Our objectives with regard to communication with tax payers are:

- to provide key information in a timely manner, ensuring full compliance with the requirements of the Data Protection and Freedom of Information Acts.

Our objectives will be met by providing the following communications:

| <i>Method of Communication</i> | <i>Media</i> | <i>Frequency of Issue</i> | <i>Method of Distribution</i> | <i>Audience Group</i> |
|--|--------------|--|-------------------------------|---|
| Reports/written response/electronic postings | Various | Reports published annually and ‘As and When required’ in relation to general enquiries | Various | All Harrow constituents and other interested parties. |

Explanation of communications

Reports/written response/electronic postings – Annual reports are published either through established communications (e.g. newsletters) or posted on the Council’s Intranet site. Other ad hoc requests are responded to in light of the specific information request and utilising the most appropriate communications medium.

Policy on communication with other stakeholders/interested parties

Our objectives with regard to communication with other stakeholder/interested parties are:

- to meet our statutory obligations in relation to notifications and consultations
- to ensure the proper administration of the scheme
- to deal with the resolution of pension disputes
- to administer the Fund’s Additional Voluntary Contribution schemes

Our objectives will be met by providing the following communications:

| Method of Communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|---|--------------------------------|--|-------------------------------|---|
| Pension Fund valuation reports <ul style="list-style-type: none"> • Rates & Adjustment (R&A) certificate • Revised R&A certificates • Cessation valuations | Electronic | Every three years | Via email | Communities & Local Government (CLG), Her Majesty's Revenue and Customs (HMRC)/all scheme employers |
| New admission agreements | Hard copy/electronic format | As new employers are entered into the Fund | Post/electronic submission | CLG/HMRC |
| Formal resolution of pension disputes | Hard copy or electronic format | As and when a dispute requires resolution | Via email or post | Scheme member or their representatives, the Pensions Advisory Service/ the Pensions Ombudsman |
| Completion of questionnaires | Hard copy or electronic format | As and when required | Via email or post | CLG/HMRC/the Pensions Regulator |

Explanation of communications

Pension Fund Valuation Reports – a statutory report issued every three years by the scheme appointed actuary, setting out the estimated assets and liabilities of the Fund as a whole, as well as setting out individual employer contribution rates for a three year period commencing one year from the valuation date

New admission agreements – a legal requirement to notify both the Secretary of State and the HMRC of new admitted bodies.

Resolution of pension disputes – a formal notification of pension dispute resolution, together with any additional correspondence relating to the dispute

Completion of questionnaires – Annual Survey

Performance Measurement

The Pensions Team already has performance measures set in place and in order to measure the success of our communications with active, deferred and pensioner members, we will use the following methods:

Timeliness

We will measure against the following target delivery timescales:

| Communication | Audience | Statutory delivery period | Target delivery period |
|--|--|--|--|
| Scheme booklet | New joiners to the LGPS | Within two months of joining | Within 3 days of joining the LGPS |
| Annual Benefit Statements as at 31 March | Active members | On request | July each year |
| Telephone calls | All | Not applicable | All phone calls to be answered within 3 rings |
| Issue of retirement benefits | Active and deferred members retiring | Within two months of retirement | Retirement benefits to be issued within 3 working days of retirement |
| Issue of deferred benefits | Leavers | Within two months of withdrawal | Within working 8 days of relevant paperwork |
| Transfers in | Joiners/active members | Within two months of request | Within 5 days of receiving relevant paperwork |
| Issue of forms i.e. expression of wish | Active members | N/A | Within 3 days of joining the LGPS |
| Changes to scheme rules | Active/deferred and pensioner members, as required | Within two months of the change coming into effect | Within one month of change coming into effect |
| Annual Pension Fund Report and Accounts | All | Within two months of request | Within five working days |

Quality

| <i>Audience</i> | <i>Method</i> | <i>To consider</i> | <i>Notes</i> |
|-----------------------------|---|---|---|
| Active and deferred members | Paper based survey with annual benefit statements | All services | Client can benchmark against published service targets. |
| All member types | Assessment against system report | Performance against task management pre-defined performance measures. | One task chosen each quarter from: retirements new starts and transfers in transfers out deferred leavers |
| | | | |
| Employers | Electronic | Scheduled / Admitted body specific issues | Regular feedback sessions. |

Results

The Pensions office publish, annually, performance against client-agreed targets. Elected Members receive copy of all performance reports through the Committee reporting cycle.

Review Process

Our communication policy will be reviewed on an annual basis, to ensure it meets audience needs and regulatory requirements. A current version of the policy statement will always be available either through the Pensions office, at:-

HR Operations

Harrow Council

3rd Floor South Wing

Civic Centre Station Road

Harrow Middlesex HA1 2XF

or on our Internet site under www.harrowpensionfund.org

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A brief guide to the Local Government Pension Scheme (LGPS)

Employees in England and Wales – issued April 2015

Highlights of the LGPS

The LGPS gives you:

Secure benefits –

the scheme provides you with a future income, independent of share prices and stock market fluctuations.

At a low cost to you –

with tax-efficient savings and lower National Insurance contributions for most people under **State Pension Age**.

And your employer pays in too –

the scheme is provided by your employer who meets the balance of the cost of providing your benefits in the LGPS.

You can look forward to your retirement with the LGPS with:

A secure pension –

worked out every **scheme year** and added to your **pension account**. The pension added to your account at the end of a **scheme year** is, if you are in the main section of the scheme, an amount equal to a 49th of your **pensionable pay** in that year. At the end of every **scheme year** the total amount of pension in your account is adjusted to take into account the cost of living (as currently measured by the **Consumer Prices Index (CPI)**).

Flexibility to pay more or less contributions –

you can boost your pension by paying more contributions, which you would get tax relief on. You also have the option in the LGPS to pay half your normal contributions in return for half your normal pension. This is known as the 50/50 section of the scheme and is designed to help members stay in the scheme when times are financially tough.

Tax-free cash –

you have the option when you draw your pension to exchange part of it for some tax-free cash.

Peace of mind –

your family enjoys financial security, with immediate life cover and a pension for your spouse, **civil partner** or **eligible cohabiting partner** and **eligible children** in the event of your death in service. If you ever become seriously ill and you've met the 2 years **vesting period**, you could receive immediate ill health benefits.

Freedom to choose when to take your pension –

you do not need to have reached your **Normal Pension Age** in order to take your pension as, once you've met the 2 years **vesting period**, you can choose to retire and draw your pension at any time between age 55 and 75. Your **Normal Pension Age** is simply the age you can retire and take the pension you've built up in full. However, if you choose to take your pension before your **Normal Pension Age** it will normally be reduced, as it's being paid earlier. If you take it later than your **Normal Pension Age** it's increased because it's being paid later.

Redundancy and Efficiency Retirement –

if you are made redundant or retired in the interests of business efficiency at or after age 55 you will, provided you've met the 2 years **vesting period**, receive immediate payment of the main benefits you've built up (but there would be a reduction for early payment of any additional pension you have chosen to buy).

Flexible retirement –

if you reduce your hours or move to a less senior position at or after age 55 you can, provided your employer agrees, and you've met the 2 years **vesting period**, draw some or all of the benefits you have already built up, helping you ease into retirement, although your benefits may be reduced for early payment.

The scheme

This guide is a short description of the conditions of membership and main scheme benefits that apply if you pay into the LGPS on or after 1 April 2014.

What kind of scheme is it?

The LGPS is a tax approved, defined benefit occupational pension scheme which was set up under the Superannuation Act 1972 (but, in the future, scheme rules will be made under the Public Service Pension Schemes Act 2013) and is contracted out of the State Second Pension scheme (S2P). The LGPS meets the government's standards under the automatic enrolment provisions of the Pensions Act 2008. The amount of pension you earn in a **scheme year** is worked out each year and added to your **pension account**. The total amount of pension in your **pension account** is revalued at the end of each **scheme year** so your pension keeps up with the cost of living. The LGPS is very secure because the benefits are set out in law.

Who can join?

The LGPS covers employees working in local government and for other organisations that have chosen to participate in it. To be able to join the LGPS you need to be under age 75 and work for an employer that offers membership of the scheme. If you are employed by a designating body, such as a town or parish council, or by a non-local government organisation which participates in the LGPS (an **admission body**), you can only join if your employer nominates you for membership of the scheme. Police officers, operational firefighters and, in general, teachers and employees eligible to join another statutory pension scheme (such as the NHS Pension Scheme) are not allowed to join the LGPS.

If you start a job in which you are eligible for membership of the LGPS you will be brought into the scheme, if your contract of employment is for 3 months or more. If it is for less than 3 months and you are, or during that period become, an **Eligible Jobholder** you will be brought into the scheme from the **automatic enrolment date** (unless your employer issues you with a postponement notice to delay bringing you into the scheme for up to a maximum of 3 months) or if your contract is extended to be for 3 months or more or you opt to join by completing an application form, you will be brought into the

scheme from the beginning of the pay period after the one in which your contract is extended or you opt to join.

If you are brought into the scheme you have the right to opt out. You cannot complete an opt out form until you have started your employment.

How do I ensure that I have become a member of the LGPS?

On joining the LGPS relevant records and a **pension account** (for each employment in the scheme, if you have more than one) will be set up and an official notification of your membership of the LGPS will be sent to you. **You should check your pay slip to make sure that pension contributions are being deducted.**

Can I opt-out of the LGPS and re-join at a later date?

Yes you can opt-out of the scheme but if you are thinking of opting out you might want to first consider an alternative option which is to elect to move to the 50/50 section of the scheme. The 50/50 section allows you to pay half your normal contributions in return for half your normal pension build up. To find out more, see the section on **flexibility to pay less**.

If having considered the 50/50 option you still decide the LGPS is not for you, you can leave the LGPS at any time on or after your first day of eligible employment by giving your employer notice in writing. You might, however, want to take independent financial advice before making the final decision to opt out.

If you opt out of the LGPS before completing 3 months membership you will be treated as never having been a member and your employer will refund to you, through your pay, any contributions you have paid during that time.

If you opt out of the LGPS with 3 or more months membership and before completing the 2 years **vesting period** you can take a refund of your contributions (less any statutory deductions) or transfer out your pension to another scheme.

If you opt out of the LGPS after meeting the 2 years **vesting period** you will have deferred benefits in the scheme and will generally have the same options as anyone leaving their job before retirement.

If you opt-out, you can, provided you are otherwise eligible to join the scheme, opt back into the scheme at any time before age 75.

If you opt out of the LGPS then:

- on the date your employer is first required to comply with the automatic enrolment provisions under the Pensions Act 2008, your employer will automatically enrol you back into the LGPS if you are an **Eligible Jobholder** at that time in the job you've opted out from, or
- if on the date your employer is first required to comply with the automatic enrolment provisions under the Pensions Act 2008 you are not an **Eligible Jobholder** in the job you opted out from, your employer will, if you subsequently become an **Eligible Jobholder** in that job, automatically enrol you back into the LGPS from the **automatic enrolment date**.

Your employer must notify you if this happens. You would then have the right to again opt out of the LGPS.

If you stay opted out your employer will normally automatically enrol you back into the LGPS approximately every 3 years from the date they have to comply with the automatic enrolment provisions provided, at the date your employer has to enrol you back in, you are an **Eligible Jobholder**.

What do I pay?

Your contribution rate depends on how much you are paid but it's currently between 5.5% and 12.5% of your **pensionable pay**. If you elect for the 50/50 section of the scheme you would pay half the rates listed below. The rate you pay depends on which pay band you fall into. When you join, and every April afterwards, your employer will decide your contribution rate. Also, if your pay changes throughout the year, your employer may decide to review your contribution rate.

Here are the pay bands and the rates that apply from April 2015.

| Contribution table 2015/16 | |
|------------------------------------|---------------------------------|
| If your actual pensionable pay is: | You pay a contribution rate of: |
| Up to £13,600 | 5.5% |
| £13,601 to £21,200 | 5.8% |
| £21,201 to £34,400 | 6.5% |
| £34,401 to £43,500 | 6.8% |
| £43,501 to £60,700 | 8.5% |
| £60,701 to £86,000 | 9.9% |
| £86,001 to £101,200 | 10.5% |
| £101,201 to £151,800 | 11.4% |
| £151,801 or more | 12.5% |

The contribution rates and / or pay bands in the table above will be reviewed periodically and may change in the future.

Do I get tax relief?

As a member of the LGPS, your contributions will attract tax relief at the time they are deducted from your **pensionable pay** and you will be contracted out of the State Second Pension scheme (S2P). There are restrictions on the amount of tax relief available on pension contributions. If the value of your pension savings increase in any one year by more than the annual allowance of £40,000 (2015/16) you may have to pay a tax charge. Most people will not be affected by the annual allowance.

What about my National Insurance contributions?

Whilst you are a member of the LGPS you will currently, prior to **State Pension Age**, pay reduced National Insurance contributions. From April 2016 the Government plans to remove the reduction in National Insurance contributions for all **contracted out** pension schemes. That reduction is currently 1.4% of your pay. More details on how this will work are expected during 2015.

Does my employer contribute?

Your employer currently pays the balance of the cost of providing your benefits in the LGPS. Every three years an independent review is undertaken to calculate how much your employer should contribute to the scheme.

Is there flexibility to pay less contributions?

Yes, in the scheme there is an option known as 50/50 which provides members with the facility to pay half the normal contributions and to build up half the normal pension during the time the reduced

contributions are being paid - see the section on **flexibility to pay less**.

Can I make extra contributions to increase my benefits?

You can increase your benefits by paying additional contributions, known as Additional Pension Contributions (APCs), to buy extra LGPS pension, or by making payments to the scheme's **Additional Voluntary Contributions (AVC)** arrangement. Your pension fund can give you more information on these options. Contact details are at the end of this guide.

You are also able to make payments to a personal pension or stakeholder pension or free-standing AVC scheme of your own choice. You may wish to take independent financial advice before you make a decision about paying extra.

What if I've been a member before and can now re-join the LGPS?

If you rejoin the LGPS and you have deferred benefits in an LGPS fund in England or Wales your deferred benefits will normally be automatically joined with your new active **pension account**. If, for benefits that are normally automatically joined, you want to retain separate deferred benefits then you must make such an election within 12 months of rejoining the scheme (or such longer period as your employer and pension fund may allow). If you rejoin the LGPS in England or Wales and have a deferred refund this **must** be joined with your new active **pension account**.

What about any non-LGPS pension rights I have?

If you have paid into another non-LGPS pension arrangement or to the LGPS in Scotland or Northern Ireland, you may be able to transfer your previous pension rights into the LGPS (provided you are not already drawing them as a pension). You only have 12 months from joining the LGPS to opt to transfer your previous pension rights, unless your employer and pension fund allows you longer.

What if I'm already receiving an LGPS pension – will it be affected?

If you are already drawing a pension from the scheme, some or all of which you built up before 1 April 2014, and you are re-employed in local government or by an employer who offers membership of the LGPS you must tell the LGPS fund that pays your pension about your new position, regardless of whether you join the scheme in your new position or not. They will let you know whether your pension in payment is affected in any way.

If you are drawing a pension from the scheme, all of which you built up after 31 March 2014, and you are re-employed in local government or by an employer who offers membership of the LGPS you do not need to inform the LGPS fund that pays your pension as there is no effect on your pension in payment. The only exception to this is if you are in receipt of an LGPS ill-health pension of the type that is stopped if you are in any gainful employment, in which case you must inform the employer who awarded you that pension and they will let you know whether your pension in payment should be stopped.

Contribution Flexibility

Flexibility to pay less

When you join the scheme you will be placed in the main section of the scheme. However, once you are a member of the scheme you will be able to elect in writing, at any time, to move to the 50/50 section if you wish.

The 50/50 section gives you the ability to pay half your normal contributions. This flexibility may be useful during times of financial hardship as it allows you to remain in the scheme, building up valuable pension benefits, as an alternative to opting out of the scheme.

A 50/50 option form is available from your employer. If you have more than one job in which you contribute to the scheme you would need to specify in which of the jobs you wish to be moved to the 50/50 section.

If you elect for 50/50 you would be moved to that section from the next available pay period. You would then start paying half your normal contributions and build up half your normal pension during the time you are in that section. When you make an election for the 50/50 section your employer must provide you with information on the effect this will have on your benefits in the scheme.

If you were to die in service whilst in the 50/50 section of the scheme the lump sum death grant and any survivor pensions would be worked out as if you were in the main section of the scheme. If you are awarded an ill-health pension which includes an amount of enhanced pension, the amount of enhanced pension added to your **pension account** is worked out as if you were in the main section of the scheme.

The 50/50 section is designed to be a short-term option for when times are tough financially. Because of this your employer is required to re-enrol you back into the main section of the scheme approximately three years from the date they first have to comply with the automatic enrolment provisions of the Pensions Act 2008 (and approximately every three years thereafter). If you wished to continue in the 50/50 section at that point you would need to make another election to remain in the 50/50 section.

There is no limit to the number of times you can elect to move between the main and the 50/50 section, and vice versa.

Flexibility to pay more

There are a number of ways you can provide extra benefits, on top of the benefits you are already looking forward to as a member of the LGPS.

You can improve your retirement benefits by paying:

- Additional Pension Contributions (APCs) to buy extra LGPS pension,
- **Additional Voluntary Contributions (AVCs)** arranged through the LGPS (in-house AVCs),
- Free Standing Additional Voluntary Contributions (FSAVCs) to a scheme of your choice,
- Contributions to a stakeholder or personal pension plan.

Your pension fund can give you more information on the first two of these options. Contact details are at the end of this guide.

Your Pension

Your LGPS benefits are made up of:

- An annual pension that, after leaving, increases every year in line with the cost of living for the rest of your life, and

- The option to exchange part of your pension for a tax-free lump sum paid when you draw your pension benefits.

How is my pension worked out?

Every year, you will build up a pension at a rate of 1/49th of the amount of **pensionable pay** (and **assumed pensionable pay**) you received in that **scheme year** if you are in the main section of the scheme (or half this rate of build up for any period you have elected to be in the 50/50 section of the scheme). If during the **scheme year** you had been on leave on reduced contractual pay or no pay due to sickness or injury, or had been on **relevant child related leave** or **reserve forces service leave** then, for the period of that leave, your pension is based on your **assumed pensionable pay** (other than during any part of **relevant child related leave** where the **pensionable pay** you received was higher than your **assumed pensionable pay**). The amount of pension built up during the **scheme year** is then added to your **pension account** and revalued at the end of each **scheme year** so your pension keeps up with the cost of living.

If you joined the LGPS before 1 April 2014, your benefits for membership before 1 April 2014 were built up in the final salary scheme and are calculated differently using your membership built up to 31 March 2014 and your final year's pay.

The examples below show how benefits based on membership in the LGPS built up after 31 March 2014 are worked out.

If you are nearing retirement and you were a member of the scheme before 1 April 2014 there is an additional protection in place to ensure that you will get a pension at least equal to that which you would have received in the scheme had it not changed on 1 April 2014. This protection is known as the **underpin**.

The **underpin** applies to you if you were:

- an active member on 31 March 2012, and
- you are within 10 years of your protected **Normal Pension Age** on 1 April 2012, and
- you haven't had a continuous break in active membership of a public service pension scheme of more than 5 years (after 31 March 2012), and
- you've not drawn any benefits in the LGPS before protected **Normal Pension Age**, and
- you leave with an immediate entitlement to benefits.

The underpin will not apply to you if you elect to opt out of the scheme before your protected **Normal Pension Age** or you wish to draw benefits from an age where you would have required employer consent to do so under the pre 1 April 2014 scheme (normally before age 60).

If you are covered by the underpin a calculation will be performed at the date you cease to contribute to the Scheme, or at your protected **Normal Pension Age** if earlier, to check that the pension you have built up (or, if you have been in the 50/50 section of the scheme at any time, the pension you would have built up had you always been in the main section of the scheme) is at least equal to that which you would have received had the scheme not changed on 1 April 2014. If it isn't, the difference will be added into your **pension account** when you draw your benefits.

What pensionable pay is used to work out the pension I build up after 31 March 2014?

The amount of pension added into your **pension account** at the end of the **scheme year** is worked out using your **pensionable pay** which is the amount of pay on which you pay your normal pension contributions.

However if during the **scheme year** you had been on leave on reduced contractual pay or no pay due to sickness or injury, or had been on **relevant child related leave** or **reserve forces service leave** then, for the period of that leave, your pension is worked out based on your **assumed pensionable pay** (other than during any part of **relevant child related leave** where the **pensionable pay** you received was higher than your **assumed pensionable pay**).

Can I exchange part of my pension for a lump sum?

You can exchange part of your annual pension for a one off tax-free cash payment. You will receive £12 lump sum for each £1 of pension given up. You can take up to 25% of the capital value of your pension benefits as a lump sum providing the total lump sum does not exceed £312,500 (2015/16 figure) less the value of any other pension rights you have in payment. Details of the maximum tax-free cash payment you can take will be given to you shortly before your retirement. It is at that time you need to make a decision.

How is my pension worked out - an example

Let's look at the build-up in a member's **pension account** for 5 years in the scheme.

Let's assume that the member joins the scheme on 1 April 2014, that their **pensionable pay** is £24,500 in **scheme year 1** and their **pensionable pay** increases by 1% each year. The cost of living (revaluation adjustment) for the end of the scheme year 31 March 2015 is 1.2%. Let's assume that the cost of living (revaluation adjustment) for the following 4 years is 2% each year.

| Scheme Year | Opening Balance | Pension Build up in Scheme Year <small>Pay/ Build up rate = Pension</small> | Total Account 31 March | Cost of Living Revaluation Adjustment | Updated Total Account |
|--------------|-----------------|--|------------------------|---------------------------------------|---|
| 1 2014/15 | £0.00 | £24,500/49 = £500.00 | £500.00 | 1.2% = £6 | £500.00 + £6.00 = £506.00 |
| 2 2015/16 | £506.00 | £24,745/49 = £505.00 | £1,011.00 | 2% = £20.22 | £1,011.00 + £20.22 = £1,031.22 |
| 3 2016/17 | £1,031.22 | £24,992.45/49 = £510.05 | £1,541.27 | 2% = £30.82 | £1,541.27 + £30.82 = £1,572.09 |
| 4 2017/18 | £1,572.09 | £25,242.37/49= £515.15 | £2,087.24 | 2% = £41.74 | £2,087.24 + £41.74 = £2,128.98 |
| 5 2018/19 | £2,128.98 | £25,494.79/49 = £520.30 | £2,649.28 | 2% = £52.99 | £2,649.28 + £52.99 = £2,702.276. |

If you joined the LGPS before 1 April 2014, your benefits for membership before 1 April 2014 are calculated differently.

For membership built up to 31 March 2008, you receive a pension of 1/80th of your **final pay** plus an automatic tax-free lump sum of 3 times your pension.

For membership built up from 1 April 2008 to 31 March 2014, you receive a pension of 1/60th of your **final pay**. There is no automatic lump sum for membership built up after March 2008, but you do have the option to exchange some of your pension for a tax-free lump sum.

Taking AVCs as cash

If you pay **Additional Voluntary Contributions (AVCs)** via the LGPS you may elect to take all of your AVC fund as a tax-free lump sum if you draw it at the same time as your main LGPS benefits **provided**, when added to your LGPS lump sum, it does not exceed 25% of the overall value of your LGPS benefits (including your AVC fund) and the total lump sum doesn't exceed £312,500 (2015/16 figure) less the value of any other pension rights you have in payment.

Details of this option will be given to you shortly before your retirement.

Retirement

When can I retire and draw my LGPS pension?

You can choose to retire and draw your pension from the LGPS at any time from age 55 to 75, provided you have met the 2 years **vesting period** in the scheme.

The **Normal Pension Age** in the LGPS is linked to your **State Pension Age** (but with a minimum of age 65). If the **State Pension Age** changes in the future then this change will also apply to your **Normal Pension Age** for benefits built up after 31 March 2014.

If you choose to take your pension before your **Normal Pension Age** it will normally be reduced, as it's being paid earlier. If you take it later than your **Normal Pension Age** it's increased because it's being paid later. You must draw your benefits in the LGPS before your 75th birthday.

You may have to retire at your employer's instigation, perhaps because of redundancy, business efficiency or permanent ill health. Your LGPS benefits, even in these circumstances can, provided you have met the 2 years **vesting period** in the scheme, provide you with an immediate retirement pension, which may even be enhanced.

If you voluntarily choose to retire before, on or after your **Normal Pension Age** you can defer drawing your benefits but you must draw them before age 75. If you draw your pension after your **Normal Pension Age**, your benefits will be paid at an increased rate to reflect late payment.

If you built up membership in the LGPS before 1 April 2014 then you will have membership in the final salary scheme. These benefits have a different **Normal Pension Age**, which for most is age 65.

Will my pension be reduced if I voluntarily retire before my Normal Pension Age?

If you choose to retire before your **Normal Pension Age** your benefits will normally be reduced to take account of being paid for longer. Your benefits are initially calculated as detailed under the heading **How is my pension worked out?** and are then reduced. How much your benefits are reduced by depends on how early you draw them.

If you were a member of the LGPS on 30 September 2006, some or all of your benefits paid early could be protected from the reduction if you have rule of 85 protection.

What if I lose my job through redundancy or business efficiency?

If you are aged 55 or over you will be entitled to the immediate unreduced payment of your LGPS benefits, provided you have met the 2 years **vesting period** in the scheme. However, any additional pension you paid for by Additional Pension Contributions (APCs) or paid for by Shared Cost Additional Pension Contributions (SCAPCs) would be paid at a reduced rate if the retirement occurred before your **Normal Pension Age** (to take account of the additional pension being paid for longer). Also if you have bought additional pension by Additional Regular Contributions (ARCs), that additional pension would be paid at a reduced rate if the retirement occurred before your pre 1 April 2014 **Normal Pension Age** which, for most, is age 65.

What happens if I have to retire early due to ill health?

If you have to leave work due to illness you may be able to receive immediate payment of your benefits.

To qualify for ill health benefits you have to have met the 2 years **vesting period** in the scheme and your employer, based on an opinion from an independent occupational health physician appointed by them, must be satisfied that you will be permanently unable to do your own job until your **Normal Pension Age** and that you are not immediately capable of undertaking gainful employment.

Ill health benefits can be paid at any age and are not reduced on account of early payment – in fact, your benefits could be increased to make up for your early retirement if you are unlikely to be capable of gainful employment within 3 years of leaving.

What if I want to have a gradual move into retirement?

This is known as flexible retirement. From age 55, if you reduce your hours or move to a less senior position, and provided you have met the 2 years **vesting period** in the scheme and your employer agrees, you can draw some or all of the pension benefits you have built up – helping you ease into retirement. If you take flexible retirement before your **Normal Pension Age** your benefits may be reduced to take account of their early payment unless your employer agrees to waive the reduction in whole or in part. If your employer agrees to flexible retirement you can still draw your wages / salary from your job on the reduced hours or grade and continue paying into the LGPS, building up further benefits in the scheme. Flexible retirement is at the discretion of your employer and they must set out their policy on this in a published statement.

What if I carry on working after my Normal Pension Age?

If you carry on working after your **Normal Pension Age** you will continue to pay into the LGPS, building up further benefits. When you eventually retire you will receive your pension unless you choose to delay drawing it. You must draw your pension by no later than age 75. Your pension will be paid at an increased rate to reflect the fact that it will be paid for a shorter time.

How does my pension keep its value?

On retiring on or after age 55 your LGPS pension increases in line with the cost of living every year throughout your retirement. As the cost of living increases, so will your pension. If you are retired on ill health grounds, your pension is increased each year regardless of your age.

Protection for your family

What benefits will be paid if I die?

If you die in service as a member of the LGPS the following benefits are payable:

- A lump sum death grant of three times your **assumed pensionable pay**.
- Pensions for **eligible children**.
- A spouse's (from an opposite sex or same sex marriage), **civil partner's** or, subject to certain qualifying conditions, an **eligible cohabiting partner's** pension, equal to 1/160th of your **pensionable pay** (or **assumed pensionable pay** where applicable) times the period of your membership in the scheme after 31 March 2014, plus 49/160^{ths} of the amount of any pension credited to your pension account following a transfer of pension rights into the scheme, plus an amount equal to 1/160th of your **assumed pensionable pay** for each year of membership you would have built up from your date of death to your **Normal Pension Age**. For final salary membership built up **before** 1 April 2014 the pension payable to a spouse or **civil partner** is equal to 1/160th of your **final pay** times the period of your membership in the scheme up to 31 March 2014 upon which your pension is based. For an **eligible cohabiting partner** the calculation is the same but the pension is only based on the period of membership after 5 April 1988 (plus any of your membership before 6 April 1988 for which you've paid additional contributions so that it counts towards an **eligible cohabiting partner's** pension).

If you are in the 50/50 section of the scheme when you die this does not impact on the value of any pension for your **spouse, civil partner, eligible cohabiting partner or eligible children**.

If you die after retiring on pension, a spouse's (from an opposite sex or same sex marriage), **civil partner's** or, subject to certain qualifying conditions, an **eligible cohabiting partner's** pension and pensions for **eligible children** are payable. The pension payable to a spouse, **civil partner** or **eligible cohabiting partner** is equal to 1/160th of the **pensionable pay** (or **assumed pensionable pay** where applicable) upon which your pension was calculated times the period of your membership in the scheme after 31 March 2014 (including any enhancement given if retirement was on ill health grounds), plus 49/160^{ths} of the amount of any pension credited to your **pension account** following a transfer of pension rights into the scheme from another pension scheme or arrangement. For final salary membership built up **before** 1 April 2014 the pension payable to a spouse or **civil partner** is equal to 1/160th of your **final pay** times the period of your membership in the scheme up to 31 March 2014 upon which your pension is based, unless you marry or enter into a **civil partnership** after retiring in which case it could be less. For an **eligible cohabiting partner** the calculation is the same but the pension is only based on the period of membership after 5 April 1988 (plus any of your membership before 6 April 1988 for which you've paid additional contributions so that it counts towards an **eligible cohabiting partner's pension**).

A lump sum death grant will be paid if you die after retiring on pension, less than 10 years pension has been paid and you are under age 75. The amount payable would be 10 times the level of your annual pension prior to giving up any pension for a tax-free cash lump sum, reduced by any pension already paid to you and the amount of any tax-free cash lump sum you chose to take when you drew your pension at retirement. There is a slight modification to this calculation for any part of the pension you are drawing which relates to membership prior to 1 April 2014. If you are receiving a pension and are also an active member of the scheme, or have a separate deferred benefit when you die this may impact on the death grant you receive.

What conditions need to be met for an eligible cohabiting partner's survivor's pension to be payable?

If you have a cohabiting partner, of either opposite or same sex, they will be entitled to receive a survivor's pension on your death if they meet the criteria to be considered to be an **eligible cohabiting partner**.

For an **eligible cohabiting partner's** survivor's pension to be payable, all of the following conditions must have applied for a continuous period of at least 2 years on the date of your death:

- you and your cohabiting partner are, and have been, free to marry each other or enter into a **civil partnership** with each other, and
- you and your cohabiting partner have been living together as if you were a married couple, or **civil partners**, and
- neither you or your cohabiting partner have been living with someone else as if you/they were a married couple or **civil partners**, and
- either your cohabiting partner is, and has been, financially dependent on you or you are, and have been, financially interdependent on each other.

On your death, a survivor's pension would be paid to your cohabiting partner if:

- all of the above criteria apply at the date of your death, and
- your cohabiting partner satisfies the pension fund that the above conditions had been met for a continuous period of at least 2 years immediately prior to your death.

Who is the lump sum death grant paid to?

The LGPS allows you to indicate who you would like any death grant to be paid to by completing and returning an expression of wish form. This form is available from the pension section. The scheme's administering authority, however, retains absolute discretion when deciding on who to pay any death grant to. You can find out how to contact the pension fund at the end of this guide.

Leavers without an immediate entitlement to benefits

If you leave your job before retirement and have met the 2 years vesting period you will have built up an entitlement to a pension. You will have two options in relation to that pension entitlement:

- you can choose to keep your benefits in the LGPS. These are known as deferred benefits and will increase every year in line with the cost of living, or
- alternatively, you may be able to transfer your deferred benefits to another pension arrangement.

If you leave your job before retirement and have not met the 2 years vesting period you will have three options:

- you will normally be able to claim a refund of your contribution, or
- you may be able to transfer your benefits to a new pension arrangement, or
- you can delay your decision until you either re-join the LGPS, transfer your benefits to a new pension arrangement, or want to take a refund of contributions. A refund of contributions must, in any event, be paid within 5 years of your leaving the scheme (or age 75 if earlier).

Refunds of Contributions

If you leave, or opt out of the scheme after 3 months' membership, and you've not met the 2 years **vesting period** you will normally be able to take a refund of your contributions. There will be a deduction for tax and the cost, if any, of buying you back into the State Second Pension scheme (S2P). A refund of contributions must be paid within 5 years of your leaving the scheme (or age 75 if earlier).

Deferred benefits

If you leave before your **Normal Pension Age** and you meet the 2 years **vesting period** you will be entitled to deferred benefits within the LGPS. Your deferred LGPS benefits will be calculated as described in the **How is my pension worked out** section using the length of your membership up to the date that you left the scheme. During the period your pension benefits are deferred they will be increased each year in line with the cost of living.

Unless you decide to transfer your deferred benefits to another pension scheme, they will normally be paid unreduced at your **Normal Pension Age**, but:

- they may be put into payment earlier and in full if, because of ill health, you are permanently incapable of doing the job you were working in when you left the LGPS and you are unlikely to be capable of undertaking any gainful employment within 3 years of applying for the benefit or by your **Normal Pension Age**, whichever is the earlier; or
- you can, if you wish, elect to receive your deferred benefits early from age 55 onwards, or
- you can, if you wish, elect not to draw your deferred benefits at your **Normal Pension Age** and defer drawing them till some time later (although they must be paid by age 75).

Benefits paid earlier than your **Normal Pension Age**, other than on the grounds of permanent ill health, may be reduced to take account of their early payment and the fact that your pension will be paid for longer. Conversely, benefits paid after your **Normal Pension Age** will be increased.

If you leave with deferred benefits and you die before they come into payment, a lump sum death grant equal to 5 years' pension will be paid. If you have deferred benefits and are also an active member of the scheme when you die this may impact on the death grant you receive. The LGPS allows you to say who you would like any death grant to be paid to by completing an expression of wish form. This form is available from the pension section. You can find out how to contact the pension fund at the end of this guide. The scheme's administering authority, however, retains absolute discretion when deciding on who to pay any death grant to.

If you leave with deferred benefits and die before they come into payment a spouse's, **civil partner's** or, subject to certain qualifying conditions, an **eligible cohabiting partner's pension** and pensions for **eligible children** are payable. The pension payable to a spouse, **civil partner** or **eligible cohabiting partner** is equal to $1/160^{\text{th}}$ of the **pensionable pay** (or **assumed pensionable pay** where applicable) upon which your pension was calculated times the period of your membership in the scheme after 31 March 2014, plus $49/160^{\text{ths}}$ of the amount of any pension credited to your **pension account** following a transfer of pension rights into the scheme from another pension scheme or arrangement. For final salary membership built up **before** 1 April 2014 the pension payable to a spouse or **civil partner** is equal to $1/160^{\text{th}}$ of your **final pay** times the period of your membership in the scheme up to 31 March 2014 upon which your pension is based, unless you marry or enter into a **civil partnership** after retiring in which case it could be less. For an **eligible cohabiting partner** the calculation is the same but the pension is only based on the period of membership after 5 April 1988 (plus any of your membership before 6 April 1988 for which you've paid additional contributions so that it counts towards an **eligible cohabiting partner's pension**).

What if I have two or more LGPS jobs?

If you have two or more jobs in which you pay into the LGPS at the same time and you leave one (or more) but not all of them, and you are entitled to deferred benefits from the job (or jobs) you have left, your deferred benefits from the job that has ended are automatically transferred to the active **pension account** for the job you are continuing in, unless you elect to keep them separate. If you wish to keep your deferred benefits separate you must elect to do so within 12 months of re-joining the LGPS,

unless your employer allows you longer. If you are not entitled to deferred benefits from the job (or jobs) you have left, you cannot have a refund of your contributions and you must transfer your benefits to the **pension account** for the job you are continuing in.

Transferring your benefits

If you leave the scheme and you are entitled to deferred benefits or a refund you can generally transfer the cash equivalent of your pension benefits into another pension arrangement or a new employer's pension scheme. This may even be to an overseas pension scheme or arrangement that meets HM Revenue and Customs conditions. You cannot transfer your benefits if you leave with less than 3 months membership or (other than in respect of Additional Voluntary Contributions (AVCs)) if you leave less than one year before your **Normal Pension Age**. An option to transfer (other than in respect of Additional Voluntary Contributions (AVCs)) must be made at least 12 months before your **Normal Pension Age**.

Your new pension provider will require a transfer value quotation which, under the provisions introduced by the Pensions Act 1995, your pension fund will guarantee for a period of three months from the date of calculation.

Alternatively, if you return to employment with an employer participating in the LGPS and rejoin the LGPS after having previously built up LGPS pension rights (i.e. you previously left an LGPS employment with deferred benefits) then these deferred benefits will normally automatically be transferred to the active **pension account** for your new job, unless you elect to keep them separate. If, for benefits that are normally automatically transferred, you wish to keep your deferred benefits separate you must elect to do so within 12 months of re-joining the LGPS, unless your employer allows you longer. If you rejoin the LGPS after having previously left an LGPS employment without building up pension rights but you deferred taking a refund of contributions (normally where you have less than two years membership) then this deferred refund **must** be joined with your new active **pension account** in the scheme.

Keep in touch – remember to let the pension fund know if you move house.

Help with pension problems

Who can help me if I have a query or complaint?

If you are in any doubt about your benefit entitlements, or have a problem or question about your LGPS membership or benefits, please contact your pension fund. They will seek to clarify or put right any misunderstandings or inaccuracies as quickly and efficiently as possible. If your query is about your contribution rate, please contact your employer's personnel/HR or payroll section so they can explain how they have decided which contribution band you are in.

If you are still dissatisfied with any decision made in relation to the scheme you have the right to have your complaint reviewed under the Internal Disputes Resolution Procedure and, as the scheme is well regulated. There are also a number of other regulatory bodies that may be able to assist you.

The various procedures and bodies are:

- **Internal Disputes Resolution Procedure**

In the first instance you should write to the adjudicator appointed by the body who made the decision about which you wish to appeal. You must do this within six months of the date of the notification of the decision or the act or omission about which you are complaining (or such longer period as the adjudicator considers reasonable). This is a formal review of the initial decision or act or omission and is an opportunity for the matter to be reconsidered. The adjudicator will consider

your complaint and notify you of his or her decision. If you are dissatisfied with that person's decision, (or their failure to make a decision) you may apply to the scheme's administering authority to have it reconsidered.

A leaflet explaining the Internal Disputes Resolution Procedure including relevant time limits is available from the pension fund.

- **The Pensions Advisory Service (TPAS)**

TPAS is available at any time to assist members and beneficiaries of the scheme in connection with any pension query they may have or any difficulty which they cannot resolve with the scheme administrator. TPAS can be contacted at:

11 Belgrave Road
London
SW1V 1RB

Telephone 0300 1231047

Website www.pensionsadvisoryservice.org.uk

- **Pensions Ombudsman**

In cases where a complaint or dispute has not been satisfactorily resolved through the Internal Disputes Resolution Procedure or with the help of TPAS, an application can be made to the Pensions Ombudsman within three years of the event that gave rise to the complaint or dispute. The Ombudsman can investigate and determine any complaint or dispute involving maladministration of the scheme or matters of fact or law and his or her decision is final and binding (unless the case is taken to the appropriate court on a point of law). Matters where legal proceedings have already started cannot be investigated by the Pensions Ombudsman. The Pensions Ombudsman can be contacted at:

11 Belgrave Road
London
SW1V 1RB

Telephone 0207 630 2200

Website www.pensions-ombudsman.org.uk

- **The Pensions Regulator**

This is the regulator of work based pension schemes. The Pensions Regulator has powers to protect members of work based pension schemes and a wide range of powers to help put matters right, where needed. In extreme cases, the regulator is able to fine trustees or employers, and remove trustees from a scheme. You can contact the Pensions Regulator at:

Napier House
Trafalgar Place
Brighton
BN1 4DW

Telephone 0845 6000707

Website www.thepensionsregulator.gov.uk

How can I trace my pension rights?

The Pension Tracing Service holds details of pension schemes, including the LGPS, together with relevant contact addresses. It provides a tracing service for ex-members of schemes with pension entitlements (and their dependants) who have lost touch with previous schemes. All occupational and personal pension schemes have to register if the pension scheme has current members contributing to the scheme or people expecting benefits from the scheme. If you need to use this tracing service please write to:

The Pension Tracing Service
The Pension Service 9
Mail Handling Site
Wolverhampton
WV98 1LU

Telephone 0845 6002 537
Website www.gov.uk/find-lost-pension

Don't forget to keep your pension providers up to date with any change in your home address.

Some terms we use

Additional Voluntary Contributions (AVCs)

These are extra payments to increase your future benefits. You can also pay AVCs to provide additional life cover.

All local government pension funds have an AVC arrangement in which you can invest money through an AVC provider, often an insurance company or building society. AVCs are deducted directly from your pay and attract tax relief.

Admission Body

An admission body is an employer that chooses to participate in the scheme under an admission agreement. These tend to be employers such as charities and contractors.

Assumed Pensionable Pay

This provides a notional *pensionable pay* figure to ensure your pension is not affected by any reduction in *pensionable pay* due to a period of sickness or injury on reduced contractual pay or no pay, or *relevant child related leave* or *reserve forces service leave*.

If you have a period of reduced contractual or no pay due to sickness or injury or you have a period of *relevant child related leave* or *reserve forces service leave* then your employer needs to provide the pension fund with the *assumed pensionable pay* you would have received during that time unless during the period of *relevant child related leave* the *pensionable pay* received was higher than the value of the *assumed pensionable pay*. This requires a calculation to be carried out by your employer to determine what your pay would have been for the period when you were on reduced contractual pay or no pay due to sickness or the period of *relevant child related leave* or *reserve forces service leave*.

The *assumed pensionable pay* is calculated as the average of the *pensionable pay* you received for the 12 weeks (or 3 months if monthly paid) before the pay period in which you went on to reduced pay or no pay because of sickness or injury or you started a period of *relevant child related leave* or *reserve forces service leave*. In calculating the average, any reduction due to authorised leave of absence or due to a trade dispute is ignored. The resulting figure is then grossed up to an annual figure and then divided by the period of time you were on reduced pay or no pay for sickness or injury or on *relevant child related leave* or *reserve forces service leave*.

Automatic enrolment date

This is the earlier of:

- the day you reach age 22 provided you are earning more than £10,000 (2015/16 figure) a year in the job, or

- the beginning of the pay period in which you first earn more than £10,000 (2015/16 figure) in the job, on an annualised basis, provided you are aged 22 or more and under **State Pension Age** at that time.

Civil Partnership (Civil Partner)

A **Civil Partnership** is a relationship between two people of the same sex (**civil partners**) which is formed when they register as civil partners of each other.

Consumer Prices Index (CPI)

The **Consumer Price Index (CPI)** is the official measure of inflation of consumer prices in the United Kingdom. This is currently the measure used to adjust your **pension account** at the end of every **scheme year** when you are an active member of the scheme and, after you have ceased to be an active member, it is used to increase (each April) the value of your deferred pension in the scheme and any pension in payment from the scheme. The adjustment ensures your pension keeps up with the cost of living.

Eligible children

Eligible children are your children. They must, at the date of your death:

- be your natural child (who must be born within 12 months of your death), or
- be your adopted child, or
- be your step-child or a child accepted by you as being a member of your family (this doesn't include a child you sponsor for charity) and be dependent on you.

Eligible children must meet the following conditions:

- be under age 18, or
- be aged 18 or over and under 23 and in full-time education or vocational training (although your administering authority can continue to treat the child as an eligible child notwithstanding a break in full-time education or vocational training), or
- be unable to engage in gainful employment because of physical or mental impairment and either:
 - has not reached the age of 23, or
 - the impairment is, in the opinion of an independent registered medical practitioner, likely to be permanent and the child was dependent on you at the date of your death because of that mental or physical impairment.

Eligible cohabiting partner

An **eligible cohabiting partner** is a partner you are living with who, at the date of your death, has met all of the following conditions for a continuous period of at least 2 years:

- you and your cohabiting partner are, and have been, free to marry each other or enter into a **civil partnership** with each other, and
- you and your cohabiting partner have been living together as if you were a married couple, or **civil partners**, and
- neither you or your cohabiting partner have been living with someone else as if you/they were a married couple or **civil partners**, and
- either your cohabiting partner is, and has been, financially dependent on you or you are, and have been, financially interdependent on each other.

Your partner is financially dependent on you if you have the highest income. Financially interdependent means that you rely on your joint finances to support your standard of living. It doesn't mean that you need to be contributing equally. For example, if your partner's income is a lot more than yours, he or she may pay the mortgage and most of the bills, and you may pay for the weekly shopping.

On your death, a survivor's pension would be paid to your cohabiting partner if:

- all of the above criteria apply at the date of your death, and
- your cohabiting partner satisfies your pension fund that the above conditions had been met for a continuous period of at least 2 years immediately prior to your death.

You are not required to complete a form to nominate a cohabiting partner for entitlement to a cohabiting partner's pension. However, you can provide your pension fund with your cohabiting partner's details. Your pension fund will require evidence upon your death to check that the conditions for a cohabiting partner's pension are met.

Eligible Jobholder

An **eligible jobholder** is a worker who is aged at least 22 and under **State Pension Age** and who earns more than the annual amount of £10,000 (2015/16 figure).

Final pay

This is usually the pay in respect of (i.e. due for) your final year of scheme membership on which you paid contributions, or one of the previous 2 years if this is higher, and includes your normal pay, contractual shift allowance, bonus, contractual overtime (but not non-contractual overtime), Maternity Pay, Paternity Pay, Adoption Pay, Shared Parental Pay and any other taxable benefit specified in your contract as being pensionable.

Normal Pension Age

Normal Pension Age is linked to your **State Pension Age** for benefits built up from April 2014 (but with a minimum of age 65) and is the age at which you can take the pension you have built up in full. If you choose to take your pension before your **Normal Pension Age** it will normally be reduced, as it's being paid earlier. If you take it later than your **Normal Pension Age** it's increased because it's being paid later.

You can use the Government's **State Pension Age** calculator (www.gov.uk/calculate-state-pension) to find out your **State Pension Age**. Please note that this calculator does not include proposed changes to **State Pension Age**.

Remember that your **State Pension Age** may change in the future and this would also change your **Normal Pension Age** in the LGPS for benefits built up from April 2014. Once you start drawing your pension any subsequent change to your **State Pension Age** will not affect your **Normal Pension Age** in the LGPS.

If you were paying into the LGPS before 1 April 2014 your final salary benefits retain their protected **Normal Pension Age** - which for most is age 65. However all pension benefits drawn on normal retirement must be taken at the same date i.e. you cannot separately draw your final salary benefits (built up before April 2014) at age 65 and your benefits built up in your **pension account** (built up from April 2014) at your **Normal Pension Age** (which for your benefits built up from April 2014 is linked to your **State Pension Age** but with a minimum of age 65).

Pension Account

Each **scheme year** the amount of pension you have built up during the year is worked out and this amount is added into your active **pension account**. Adjustments may be made to your account during the **scheme year** to take account of any transfer of pension rights into the account during the year, any additional pension you may have decided to purchase during the year or which is granted to you

by your employer, any reduction due to a Pension Sharing Order or qualifying agreement in Scotland (following a divorce or dissolution of a **civil partnership**) and any reduction due to an Annual Allowance tax charge that you have asked the scheme to pay on your behalf. Your account is then revalued at the end of each **scheme year** to take account of the cost of living. This adjustment is carried out in line with the Treasury Revaluation Order index which, currently, is the rate of the **Consumer Prices Index (CPI)**.

You will have a separate **pension account** for each employment. That **pension account** will hold the entire pension built-up for that employment.

In addition to an active member's **pension account** there are also:

- a deferred member's **pension account**;
- a deferred refund account;
- a retirement **pension account**;
- a flexible retirement **pension account**;
- a deferred pensioner member's account;
- a pension credit account; and
- a survivor member's account.

These accounts will be adjusted by any debits for any Pension Sharing Order or qualifying agreement in Scotland (following a divorce or dissolution of a **civil partnership**) and for any Annual Allowance tax charge that you have asked the scheme to pay on your behalf. These accounts are currently increased each April in line with the **Consumer Prices Index (CPI)**.

Pensionable Pay

The pay on which you normally pay contributions is your normal salary or wages plus any shift allowance, bonuses, overtime (both contractual and non-contractual), Maternity Pay, Paternity Pay, Adoption Pay, Shared Parental Pay and any other taxable benefit specified in your contract as being pensionable.

You do not pay contributions on any travelling or subsistence allowances, pay in lieu of notice, pay in lieu of loss of holidays, any payment as an inducement not to leave before the payment is made, any award of compensation (other than payment representing arrears of pay) made for the purpose of achieving equal pay, pay relating to loss of future pensionable payments or benefits, any pay paid by your employer if you go on **reserve forces service leave** nor (apart from some historical cases) the monetary value of a car or pay received in lieu of a car.

Relevant Child Related Leave

Relevant child related leave includes periods of Ordinary Maternity, Adoption or Shared Parental Leave (normally first 26 weeks), Paternity Leave and any periods of paid Additional Maternity or Adoption Leave (normally after week 26 weeks up week 39) or Shared Parental Leave.

Reserve Forces Service Leave

This occurs when a Reservist is mobilised and called upon to take part in military operations. The period of mobilisation can range from three months or less and up to a maximum of 12 months. During a period of **reserve forces service leave** you will, if you elect to stay in the LGPS during that leave, continue to build up a pension based on the rate of **assumed pensionable pay** you would have received had you not been on **reserve forces service leave**.

Scheme Year

The scheme year runs from 1 April to 31 March each year.

State Pension Age

This is the earliest age you can receive the state basic pension. **State Pension Age** is currently age 65 for men. **State Pension Age** for women is currently being increased to be equalised with that for men and will reach 65 by November 2018.

State Pension Age equalisation timetable for women

| Date of Birth | New State Pension Age |
|---------------------------------|-----------------------|
| Before 6 April 1950 | 60 |
| 6 April 1950 - 5 April 1951 | In the range 60 - 61 |
| 6 April 1951 - 5 April 1952 | In the range 61 - 62 |
| 6 April 1952 - 5 April 1953 | In the range 62 - 63 |
| 6 April 1953 - 5 August 1953 | In the range 63 - 64 |
| 6 August 1953 - 5 December 1953 | In the range 64 - 65 |

The **State Pension Age** will then increase to 66 for both men and women from December 2018 to October 2020.

Increase in State Pension Age from 65 to 66 for men and women

| Date of Birth | New State Pension Age |
|----------------------------------|-----------------------|
| 6 December 1953 - 5 October 1954 | In the range 65 - 66 |
| After 5 October 1954 | 66 |

Under current legislation the **State Pension Age** is due to rise to 67 between 2026 and 2028 and to 68 between 2044 and 2046. However, the government has announced plans to link rises in the **State Pension Age** above age 67 to increases in life expectancy. To find out your **State Pension Age** please visit <https://www.gov.uk/calculate-state-pension>.

Vesting Period

The **vesting period** in the LGPS is 2 years. You will meet the 2 years **vesting period** if:

- you have been a member of the LGPS in England and Wales for 2 years, or
- you have brought a transfer of pension rights into the LGPS in England or Wales from a different occupational pension scheme or from a European pensions institution and the length of service you had in that scheme or institution was 2 or more years or, when added to the period of time you have been a member of the LGPS is, in aggregate, 2 or more years, or
- you have brought a transfer of pension rights into the LGPS in England or Wales from a pension scheme or arrangement where you were not allowed to receive a refund of contributions, or
- you have previously transferred pension rights out of the LGPS in England or Wales to a pension scheme abroad (i.e. to a qualifying recognised overseas pension scheme), or
- you already hold a deferred benefit or are receiving a pension from the LGPS in England or Wales (other than a survivor's pension or pension credit member's pension), or
- you have paid National Insurance contributions whilst a member of the LGPS and cease to contribute to the LGPS in the tax year of attaining pension age,
- you cease to contribute to the LGPS at age 75, or
- you die in service.

Further information and disclaimer

This guide is for employees in England or Wales and reflects the provisions of the LGPS and overriding legislation as at 1 April 2015.

The national web site for members of the LGPS who contribute to the scheme on or after 1 April 2014 can be found at www.lgps2014.org.

This guide cannot cover every personal circumstance. For example, it does not cover all ill health retirement benefits. Nor does it cover rights that apply to a limited number of employees e.g. those whose total pension benefits exceed the lifetime allowance (£1.25 million in 2015/16), those whose pension benefits increase in any tax year by more than the annual allowance (£40,000 in 2015/16), those to whom protected rights apply, those whose rights are subject to a pension sharing order following divorce or dissolution of a civil partnership. In the event of any dispute over your pension benefits the appropriate legislation will prevail. This short guide does not confer any contractual or statutory rights and is provided for information purposes only.

More detailed information about the scheme is available from:

Harrow Pension Fund
HR Operations – Pensions, 3rd Floor South Wing, Civic Centre,
Station Road, Harrow, HA1 2XF.
Tel: 020 8901 2655 Fax: 020 8424 7520
Email: pension@harrow.gov.uk
Website: Harrowpensionfund.org

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***LONDON BOROUGH OF HARROW
PENSION FUND***

***STATEMENT OF
INVESTMENT PRINCIPLES***

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Introduction

- 1.1 This is the Statement of Investment Principles (SIP) adopted by Harrow Council (the Council) in relation to the investment of assets of the Council's Pension Fund (the Fund). The Council is the Administering Authority of the Fund and, in that role it has responsibility to ensure the proper management of the Fund.
- 1.2 This SIP meets the requirements of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 ("The Regulations") and has been prepared after taking appropriate advice.
- 1.3 The Council, as Administering Authority, decides on the investment policies most suitable to meet the liabilities of the Pension Fund and has ultimate responsibility for investment strategy. These powers are exercised on its behalf by the Council's Pension Fund Committee. The Committee monitors investments, including manager performance, on a quarterly basis. Advice is received as required from the officers, the professional investment adviser and the independent advisers. In addition, the Committee requires managers periodically to attend its meetings. The Committee is responsible for monitoring compliance with guidance given by the Secretary of State for Communities and Local Government.
- 1.4 The Council has delegated the management of the Fund's investments to professional investment managers, appointed in accordance with the Local Government Pension Scheme (LGPS) regulations, whose activities are specified in either detailed investment management agreements or subscription agreements and regularly monitored. The Committee is satisfied that the appointed fund managers have sufficient expertise and experience to carry out their role
- 1.5 The Statement is subject to review from time to time and, certainly, within six months of any material change in investment policy or other matters as required by law.

Fund Objectives

- 2.1 The LGPS is established by statute. The Pension Fund is a legally distinct account with contributions made by employees (fixed percentage of earnings) and employers. The primary objective of the Fund is to optimise performance within risk parameters thereby minimising the level of employer contributions in order to meet the cost of pension benefits as required by statute.
- 2.2 A related objective is to minimise the volatility of employer contribution rates as investment returns vary from year to year.

Investment Objectives

- 3.1 The investment objective of the Fund is to achieve a return that is sufficient to meet the funding objectives as set out above, subject to an appropriate level of risk (implicit in the target) and liquidity. Over the long-term, it is expected that the Fund's investment returns will be at least in line with the assumptions underlying the actuarial valuation.

Investment style

- 4.1 It is the Council's current policy that external fund managers are employed to administer the Fund's assets. The current structure, as set out in the table below, was agreed in principle in November 2013 and is being implemented during 2014-15. The majority of the Fund is invested in "growth assets" i.e. those expected to generate 'excess' returns over the long term. These include equities, and private equity. The structure also includes a small allocation to "cash flow matching" assets, mainly corporate bonds. Additionally, the investments in property and diversified growth funds provide both diversification and expected returns in excess of liabilities.

The table below shows the asset allocation structure.

| ASSET CLASS | MANAGEMENT APPROACH | ALLOCATION | RANGE |
|--------------------------------|---------------------|------------|-------|
| | | % | % |
| Equities | | | |
| Global | Passive | 31.0 | |
| | Active | | |
| Global | Unconstrained | 20.7 | |
| | Active | | |
| Emerging Markets | Unconstrained | 10.3 | |
| TOTAL | | 62.0 | 58-68 |
| Bonds | | | |
| Corporate | Active | 10.4 | |
| Index-linked gilts | Active | 2.6 | |
| TOTAL | | 13.0 | 11-15 |
| Alternative Investments | | | |
| Diversified Growth Funds | Active | 10.0 | |
| TOTAL | | 10.0 | 8-12 |
| Property | Active | 10.0 | 8-12 |
| Private Equity | Active | 5.0 | 4-6 |
| TOTAL | | 100.0 | |

- 4.2 The above allocations, ranges and the management structure comply with the limits set out in The Regulations with the exception that the limit on single insurance contracts has been increased from 25% to the upper limit of 35% to permit investment, prior to the re-structure being completed in a passive UK equities portfolio. This decision will apply until the completion of the re-structure. The decision to increase the limit complies with The Regulations.

- 4.3 The investment style is to appoint fund managers with clear performance benchmarks and place maximum accountability for performance against that benchmark with them. Multiple fund managers are appointed to give diversification of investment style and spread of risk. The fund managers appointed are mainly remunerated through fees based on the value of assets under management. Private equity managers are remunerated through fees based on commitments and also performance related fees.
- 4.4 The investment strategy is reviewed periodically.
- 4.5 Cash balances are held in either or both of the two Pension Fund bank accounts, current and call account.
- 4.6 Actual asset allocations are monitored against the above structure and rebalanced as appropriate. The Section 151 officer has delegated authority to undertake a quarterly rebalancing of the equity and bond portfolios should they breach the above ranges. Any rebalancing activity authorised by the Section 151 officer will be reported to the next meeting of the Pension Fund Committee. Rebalancing within the bond portfolio is delegated to the fund manager.
- 4.7 Where appropriate, custodians are appointed to provide trade settlement and processing and related services. Where investments are held through funds, the fund appoints its own custodian.
- 4.8 Stock lending is permitted in pooled funds where applicable. Details of investment managers' procedures and controls are available on request.

Performance

- 5.1 Performance targets are set on a three-year rolling basis in relation to the benchmark. The investment managers' performance is reviewed at quarterly and annual intervals by the WM Performance Services who provide independent performance statistics and reports.
- 5.2 The Council also monitors the qualitative performance of the Fund managers to ensure that they remain suitable for the Fund. These qualitative aspects include changes in ownership, changes in personnel, and investment administration

Types of Investments

- 6.1 A management agreement is in place for each fund manager, setting out where relevant, the benchmark, performance target and asset allocation ranges. The agreements also set out any statutory or other restrictions determined by the Council. Investment may be made in accordance with The Regulations in equities, fixed interest and other bonds and property, in the UK and overseas markets. The Regulations specify other investment instruments that may be used, for example, financial futures, traded options, insurance contracts, stock lending, sub-underwriting contracts.

- 6.2 The Regulations also specify certain limitations on investments. Principally, these place a limit of 10% of the whole fund in any single holding, or deposits with a single bank or institution, or investments in unlisted securities. The Council does however have discretion to adopt a higher statutory limit in respect of specific investments subject to formal agreement by the Council.

Investment Risk

- 7.1 Whilst the objective of the Council is to maximise the return on its investments, it recognises that this has to be within certain risk parameters and that no investment is without an element of risk. The Council acknowledges that the predominantly equity based investment strategy may entail risk to contribution stability, particularly due to the short term volatility that equity investments can involve. The long term nature of the Fund and the expectation that longer term returns from equity investments will exceed those from bonds mean, however, that a high equity allocation remains an appropriate strategy for the Fund.
- 7.2 A policy of diversification for its investments and investment managers helps the Council to mitigate overall risk. Benchmarks and targets against which investment managers are expected to perform are further measures put in place to manage the risks for the Fund. Manager performance is monitored quarterly with investigation of any significant deviations from intended strategy.
- 7.3 With investment returns included, the Fund has a positive cash flow that enables investment in illiquid asset classes e.g. private equity and property. More than 70% of the fund is invested in equities and bonds that are highly liquid.
- 7.4 The Council has established a currency hedge covering 50% of the global equity portfolio to dampen the effect of foreign currency fluctuations against sterling.
- 7.5 Demographic factors including the uncertainty around longevity / mortality projections (e.g. longer life expectancies) contribute to funding risk. There are limited options currently available to fully mitigate or hedge this risk. The Council monitors liabilities using a specialist service provided by Club Vita, a “sister” company of the Fund’s Actuary, Hymans Robertson. Club Vita carries out a comprehensive analysis of the Fund’s longevity data to facilitate an understanding which helps to manage this issue in the most effective way.

The realisation of investments

- 8.1 A realisable (liquid) investment is one that can be readily converted into cash, for example to satisfy payments out of the Fund. The majority of the Fund’s assets are highly liquid and the Council is satisfied that the Fund has sufficient liquid assets to meet all expected and unexpected demands for cash. Assets in the Fund that are considered to be illiquid include property and private equity. As a long term investor the Council considers it prudent to include illiquid assets in its strategic asset allocation in order to benefit from the additional diversification and extra return this should provide.
- 8.2 The Council has delegated to the fund managers responsibility for the selection, retention and realisation of assets.

Investment advice

- 9.1 Professional advice on investment matters is taken from the investment practice of Aon Hewitt. Hymans Robertson provides actuarial services.

Social, environmental or ethical considerations

- 10.1 The extent to which social, environmental and ethical considerations are taken into account in investment decisions is left to the discretion of the fund managers. However, the Council expects that investment return is seen as the priority and that the extent to which these considerations may have a financial impact on the portfolio will be taken into account by the fund managers in the exercise of their delegated duties. However, the Council expects the fund managers to engage positively and seek to influence companies in which the Fund invests to take account of key social, environmental and ethical considerations.

Exercise of the rights (including voting rights) attaching to investments

- 11.1 The Council is an active shareholder and will exercise its rights (including voting rights) to promote and support good corporate governance principles which in turn will feed through into good investment performance.
- 11.2 In practice, the Fund's equity holdings are wholly invested through pooled funds in which voting and engagement decisions are made by fund managers. The Council encourages its fund managers to vote and engage with investee companies worldwide to ensure they comply with best practice in corporate governance in each locality. The fund managers provide reports on their voting and engagement activities.

Additional Voluntary Contributions (AVC)

- 12.1 In line with statute, the Council has to appoint AVC providers and the current providers are Clerical Medical Equitable Life and Prudential.

Compliance with "Myners" Principles

- 13.1 In Appendix 1 are set out the details of the extent to which the Fund complies with the six updated "Myners" principles set out in the Chartered Institute of Public Finance and Accountancy's publication "Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012." These principles codify best practice in investment decision making

Compliance with “Myners” Principles”

1. Effective decision-making

Administering authorities should ensure that:

- decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to take them effectively and monitor their implementation.
- those persons or organisations should have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest.

Fund compliance – Full

- The Council has delegated decision making in respect of the Pension Fund to the Pension Fund Committee, comprising four Councillors with full voting rights with representatives from the trade unions invited.
- The Committee, with advice from its Investment Adviser and independent advisers has appropriate skills for, and is run in a way that facilitates, effective decision making.
- Members of the Committee are provided with training opportunities in line with the skills and knowledge framework produced by CIPFA and a training log is maintained.
- There are sufficient internal resources and access to external resources for the Pension Fund Committee to make effective decisions.

2 Clear objectives

An overall investment objective(s) should be set out for the Fund that takes account of the scheme’s 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. These should be clearly communicated to advisers and investment managers.

Fund compliance - Full

- The Fund’s Statement of Investment Principles and Funding Strategy Statement set out its investment objectives which are agreed after consultation with the Fund actuary and take into account the Fund’s liabilities, the impact on employer contribution rates, future cashflows and the Fund’s attitude to risk.
- Asset allocation, benchmarks and risk parameters are set with the aim of achieving these objectives.
- Fund managers have clear written mandates with individual performance targets and benchmarks and their performance is measured and reviewed by the Committee on a quarterly basis.
- Full account is taken of the strength of the sponsor covenant for all non-local authority employers admitted to the fund and contribution rates set accordingly.

3 Risks and Liabilities

In setting and reviewing their investment strategy, administering 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.

Fund compliance – Full

- The Committee, in setting its investment strategy, has taken account of the form and structure of its liabilities following advice from the Fund's actuary. The strategy aims to achieve the return required to meet its liabilities whilst taking into account stability of contributions and affordability for employers.
- Consideration is given to the payment of a bond by prospective admitted bodies to the Fund to minimise the financial consequences of default.
- A risk assessment and suggestions as to how the risks can be managed is included in the triennial valuation.
- Longevity risk is built into the triennial actuarial and is therefore included when determining the investment strategy
- Investment risk, including that of underperformance is taken into account in the Statement of Investment Principles and the Fund's Annual Report.

4 Performance Assessment

Arrangements should be in place for the formal measurement of the performance of investments, investment managers and advisers. Administering authorities should also periodically make a formal policy assessment of their own effectiveness as a decision-making body and report on this to scheme members.

Fund compliance – Partial

- In addition to overall Fund performance, the Committee considers the performance of individual investment managers against their benchmarks on a quarterly basis; matters of poor performance are addressed through meetings with fund managers and, if necessary, the termination of contracts.
- An independent performance measurement company provides quarterly and annual reports detailing the performance of the Fund and its managers and identifying the achievements resulting from asset allocation and manager performance.
- The Committee also receives, annually, data measuring its performance against that of other administering authorities but in reviewing this is conscious of the need to set its own investment strategy based on its own Fund liabilities and other local conditions.
- The performance of actuaries and advisers is informally assessed on an ongoing basis.
- The performance of the Fund is reported annually to all scheme members and is included in the Annual report; the Committee will be considering ways of improving their accountability, particularly in the context of the imminent establishment of the local pension board.

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 members on the discharge of such responsibilities.

Fund compliance – Partial

- The Fund’s policy on the extent to which its investment managers take account of social, environmental and ethical considerations is stated in the Statement of Investment Principles.
- The Fund expects its managers to engage positively and seek to influence companies in which the Fund invests to take account of key social, environmental and ethical considerations.
- Where applicable, the Fund expects its managers to have adopted the Institutional Shareholders’ Committee Statement of Principles on the responsibilities of shareholders and agents.
- Whilst the Fund’s equity holdings are wholly invested through pooled funds in which voting and engagement decisions are made by fund managers the Council encourages its managers to vote and engage with investee companies worldwide to ensure they comply with best practice in corporate governance in each locality. The fund managers provide reports on their voting and engagement activities.

6 Transparency and Reporting

Administering authorities should:

- Act in a transparent manner, communicating with stakeholders on issues relating to their management of investment, its governance and risks, including performance against stated objectives.
- Provide regular communication to members in the form they consider most appropriate.

Fund compliance – Full

- The Fund publishes a Communications Policy Statement detailing its policy and detailed strategy for communicating information to members, prospective members and their employers, union representatives, elected Members, tax payers and other interested parties. The Fund makes available a range of documents including:
 - Annual Report including Statement of Accounts.
 - Governance Compliance Statement which includes level of compliance.
 - Communications Policy Statement.
 - Statement of Investment Principles.
 - Funding Strategy Statement.
 - Triennial Actuarial Valuation.
 - Agenda and Minutes of Pension Fund Committee.
 - Annual Statement of Benefits to all active and deferred members.
 - Newsletter to pensioners once a year.
 - Newsletters to active members at least once a year.
- The Communications Policy Statement details the methods of communication available for each “target” group which include:
 - The Council’s website
 - Hard copy
 - Annual employers meeting
 - Quarterly employers focus groups
 - DVD

LONDON BOROUGH OF HARROW PENSION FUND FUNDING STRATEGY STATEMENT MARCH 2014

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1 Introduction

1.1 What is this document?

This is the Funding Strategy Statement (FSS) of the London Borough of Harrow Pension Fund (“the Fund”), which is administered by London Borough of Harrow Council, (“the Administering Authority”).

It has been prepared by the Administering Authority in collaboration with the Fund’s actuary, Hymans Robertson LLP and after consultation with the Fund’s employers and investment adviser. It is effective from 1 April 2014.

1.2 What is the London Borough of Harrow Pension Fund?

The Fund is part of the national Local Government Pension Scheme (LGPS). The LGPS was set up by the UK Government to provide retirement and death benefits for local government employees, and those employed in similar or related bodies, across the whole of the UK. The Administering Authority runs the London Borough of Harrow Fund, to make sure it:

- receives the proper amount of contributions from employees and employers, and any transfer payments;
- invests the contributions appropriately, with the aim that the Fund’s assets grow over time with investment income and capital growth;
- uses the assets to pay Fund benefits to the members (as and when they retire, for the rest of their lives), and to their dependants (as and when members die), as defined in the LGPS Regulations. Assets are also used to pay transfer values and administration costs.

The responsibilities of the key parties involved in the management of the Fund are summarised in [Appendix B](#).

1.3 Why does the Fund need a Funding Strategy Statement?

Employees’ benefits are guaranteed by the LGPS Regulations, and do not change with market values or employer contributions. Investment returns will help pay for some of the benefits, but probably not all, and certainly with no guarantee. Employees’ contributions are fixed in those Regulations also, at a level which covers only part of the cost of the benefits.

Therefore, employers need to pay the balance of the cost of delivering the benefits to members and their dependants.

The FSS focuses on how employer liabilities are measured, the pace at which these liabilities are funded, and how employers or pools of employers pay for their own liabilities. This statement sets out how the Administering Authority has balanced the conflicting aims of:

- affordability of employer contributions,
- transparency of processes,
- stability of employers’ contributions, and
- prudence in the funding basis.

There are also regulatory requirements for an FSS, as given in [Appendix A](#).

The FSS is a summary of the Fund’s approach to funding its liabilities, and this includes reference to the Fund’s other policies; it is not an exhaustive statement of policy on all issues. The FSS forms part of a framework which includes:

- the LGPS Regulations;
- the Rates and Adjustments Certificate (confirming employer contribution rates for the next three years) which can be found in an appendix to the formal valuation report;
- the Fund's policies on admissions, cessations and bulk transfers;
- actuarial factors for valuing individual transfers, early retirement costs and the costs of buying added service; and
- the Fund's Statement of Investment Principles (see Section 4).

1.4 How does the Fund and this FSS affect me?

This depends who you are:

- a member of the Fund, i.e. a current or former employee, or a dependant: the Fund needs to be sure it is collecting and holding enough money so that your benefits are always paid in full;
- an employer in the Fund (or which is considering joining the Fund): you will want to know how your contributions are calculated from time to time, that these are fair by comparison to other employers in the Fund, and in what circumstances you might need to pay more. Note that the FSS applies to all employers participating in the Fund;
- an Elected Member whose council participates in the Fund: you will want to be sure that the council balances the need to hold prudent reserves for members' retirement and death benefits, with the other competing demands for council money;
- a Council Tax payer: your council seeks to strike the balance above, and also to minimise cross-subsidies between different generations of taxpayers.

1.5 What does the FSS aim to do?

The FSS sets out the objectives of the Fund's funding strategy, such as:

- to ensure the long-term solvency of the Fund, using a prudent long term view. This will ensure that sufficient funds are available to meet all members'/dependants' benefits as they fall due for payment;
- to ensure that employer contribution rates are reasonably stable where appropriate;
- to minimise the long-term cash contributions which employers need to pay to the Fund, by recognising the link between assets and liabilities and adopting an investment strategy which balances risk and return (**NB** this will also minimise the costs to be borne by Council Tax payers);
- to reflect the different characteristics of different employers in determining contribution rates. This involves the Fund having a clear and transparent funding strategy to demonstrate how each employer can best meet its own liabilities over future years; and
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations.

1.6 How do I find my way around this document?

In [Section 2](#) there is a brief introduction to some of the main principles behind funding, i.e. deciding how much an employer should contribute to the Fund from time to time.

In [Section 3](#) we outline how the Fund calculates the contributions payable by different employers in different situations.

In [Section 4](#) we show how the funding strategy is linked with the Fund's investment strategy.

In the [Appendices](#) we cover various issues in more detail:

- A. the regulatory background, including how and when the FSS is reviewed,
- B. who is responsible for what,
- C. what issues the Fund needs to monitor, and how it manages its risks,
- D. some more details about the actuarial calculations required,
- E. the assumptions which the Fund actuary currently makes about the future,
- F. a [glossary](#) explaining the technical terms occasionally used here.

If you have any other queries please contact

Hasina.Shah@harrow.gov.uk

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2 Basic funding issues

(More detailed and extensive descriptions are given in [Appendix D](#)).

2.1 How does the actuary calculate a contribution rate?

Employer contributions are normally made up of two elements:

- a) the estimated cost of future benefits being built up from year to year, referred to as the “*future service rate*”; plus
- b) an adjustment for the difference between the assets built up to date and the value of past service benefits, referred to as the “*past service adjustment*”. If there is a deficit the past service adjustment will be an increase in the employer’s total contribution; if there is a surplus there may be a reduction in the employer’s total contribution. Any past service adjustment will aim to return the employer to full funding over an appropriate period (the “deficit recovery period”).

2.2 How is a deficit (or surplus) calculated?

An employer’s “funding level” is defined as the ratio of:

- the market value of the employer’s share of assets, to
- the value placed by the actuary on the benefits built up to date for the employers, employees and ex-employees (the “liabilities”). The Fund actuary agrees with the Administering Authority the assumptions to be used in calculating this value.

If this is less than 100% then it means the employer has a shortfall, which is the employer’s deficit; if it is more than 100% then the employer is said to be in surplus. The amount of deficit or shortfall is the difference between the asset value and the liabilities value.

A larger deficit will give rise to higher employer contributions. If a deficit is spread over a longer period then the annual employer cost is lower than if it is spread over a shorter period.

2.3 How are contribution rates calculated for different employers?

The Fund’s actuary is required by the Regulations to report the *Common Contribution Rate*, for all employers collectively at each triennial valuation, combining items (a) and (b) above. This is based on actuarial assumptions about the likelihood, size and timing of benefit payments to be made from the Fund in the future, as outlined in [Appendix E](#).

The Fund’s actuary is also required to adjust the *Common Contribution Rate* for circumstances specific to each individual employer. The sorts of specific circumstances which are considered are discussed in [Section 3](#). It is this adjusted contribution rate which the employer is actually required to pay, and the rates for all employers are shown in the Fund’s Rates and Adjustments Certificate.

In effect, the *Common Contribution Rate* is a notional quantity, as it is unlikely that any employer will pay that exact rate. Separate future service rates are calculated for each employer together with individual past service adjustments according to employer-specific circumstances.

Details of the outcome of the Actuarial Valuation as at 31 March 2013 can be found in the formal valuation report dated 31 March 2014, including an analysis at Fund Level of the *Common Contribution Rate*. Further details of individual employer contribution rates can also be found in the formal report.

2.4 What else might affect the employer's contribution?

Employer covenant, and likely term of membership, are also considered when setting contributions: more details are given in [Section 3](#).

For some employers it may be agreed to pool contributions, see [3.4](#).

Any costs of non ill-health early retirements must be paid by the employer, see [3.6](#).

If an employer is approaching the end of its participation in the Fund then its contributions may be amended appropriately, so that the assets meet (as closely as possible) the value of its liabilities in the Fund when its participation ends.

Employers' contributions are expressed as minima, with employers able to pay contributions at a higher rate. Account of the higher rate will be taken by the Fund Actuary at subsequent valuations.

2.5 What different types of employer participate in the Fund?

Historically the LGPS was intended for local authority employees only. However over the years, with the diversification and changes to delivery of local services, many more types and numbers of employers now participate. There are currently more employers in the Fund than ever before, a significant part of this being due to the establishment of new academies.

In essence, participation in the LGPS is open to public sector employers providing some form of service to the local community. Whilst the majority of members will be local authority employees (and ex-employees), the majority of participating employers are those providing services in place of (or alongside) local authority services: academies, contractors, housing associations, charities, etc.

The LGPS Regulations define various types of employer as follows:

Scheduled bodies - councils, and other specified employers such as academies and further education establishments. These must provide access to the LGPS in respect of their employees who are not eligible to join another public sector scheme (such as the Teachers Scheme). These employers are so-called because they are specified in a schedule to the LGPS Regulations.

It is now possible for Local Education Authority schools to convert to academy status, and for other forms of school (such as Free Schools) to be established under the academies legislation. All such academies, as employers of non-teaching staff, become separate new employers in the Fund. As academies are defined in the LGPS Regulations as "Scheduled Bodies", the Administering Authority has no discretion over whether to admit them to the Fund, and the academy has no discretion whether to continue to allow its non-teaching staff to join the Fund. There has also been guidance issued by the DCLG regarding the terms of academies' membership in LGPS Funds.

Designating employers - employers such as town and parish councils are able to participate in the LGPS via resolution (and the Fund cannot refuse them entry where the resolution is passed). These employers can designate which of their employees are eligible to join the scheme.

Other employers are able to participate in the Fund via an admission agreement, and are referred to as 'admission bodies'. These employers are generally those with a "community of interest" with another scheme employer – **community admission bodies** ("CAB") or those providing a service on behalf of a scheme employer – **transferee admission bodies** ("TAB"). CABs will include housing associations and charities, TABs will generally be contractors. The Fund is able to set its criteria for participation by these employers and can refuse entry if the requirements as set out in the Fund's admissions policy are not met.

2.6 How does the Fund recognise that contribution levels can affect council and employer service provision, and Council Tax?

The Administering Authority and the Fund actuary are acutely aware that, all other things being equal, a higher contribution required to be paid to the Fund will mean less cash available for the employer to spend on the provision of services. For instance:

- Higher pension Fund contributions may result in reduced council spending, which in turn could affect the resources available for council services, and/or greater pressure on Council Tax levels;
- Contributions which academies pay to the Fund will therefore not be available to pay for providing education;
- Other employers will provide various services to the local community, perhaps through housing associations, charitable work, or contracting council services. If they are required to pay more in pension contributions to the LGPS then this may affect their ability to provide the local services.

Whilst all this is true, it should also be borne in mind that:

- The Fund provides invaluable financial security to local families, whether to those who formerly worked in the service of the local community who have now retired, or to their families after their death;
- The Fund must have the assets available to meet these retirement and death benefits, which in turn means that the various employers must each pay their own way. Lower contributions today will mean higher contributions tomorrow: deferring payments does not alter the employer's ultimate obligation to the Fund in respect of its current and former employees;
- Each employer will generally only pay for its own employees and ex-employees (and their dependants), not for those of other employers in the Fund;
- The Fund strives to maintain reasonably stable employer contribution rates where appropriate and possible;
- The Fund wishes to avoid the situation where an employer falls so far behind in managing its funding shortfall that its deficit becomes unmanageable in practice: such a situation may lead to employer insolvency and the resulting deficit falling on the other Fund employers. In that situation, those employers' services would in turn suffer as a result;
- Council contributions to the Fund should be at a suitable level, to protect the interests of different generations of Council Tax payers. For instance, underpayment of contributions for some years will need to be balanced by overpayment in other years; the council will wish to minimise the extent to which Council Tax payers in one period are in effect benefiting at the expense of those paying in a different period.

Overall, therefore, there is clearly a balance to be struck between the Fund's need for maintaining prudent funding levels, and the employers' need to allocate their resources appropriately. The Fund achieves this through various techniques which affect contribution increases to various degrees (see [3.1](#)). In deciding which of these techniques to apply to any given employer, the Fund will consider a risk assessment of that employer using a knowledge base which is regularly monitored and kept up-to-date. This database will include such information as the type of employer, its membership profile and funding position, any guarantors or security

provision, material changes anticipated, etc. This helps the Fund establish a picture of the financial standing of the employer, i.e. its ability to meet its long term Fund commitments.

For instance, where an employer is considered relatively low risk then the Fund will permit greater smoothing (such as stabilisation or a longer deficit recovery period relative to other employers) which will temporarily produce lower contribution levels than would otherwise have applied. This is permitted in the expectation that the employer will still be able to meet its obligations for many years to come.

On the other hand, an employer whose risk assessment indicates a less strong covenant will generally be required to pay higher contributions (for instance, with a more prudent funding basis or a shorter deficit recovery period relative to other employers). This is because of the higher probability that at some point it will fail or be unable to meet its pension contributions, with its deficit in the Fund then falling to other Fund employers.

The Fund actively seeks employer input, including to its funding arrangements, through various means: see [Appendix A](#).

3 Calculating contributions for individual employers

3.1 General comments

A key challenge for the Administering Authority is to balance the need for stable, affordable employer contributions with the requirement to take a prudent, longer-term view of funding and ensure the solvency of the Fund. With this in mind, there are a number of methods which the Administering Authority may permit, in order to improve the stability of employer contributions. These include, where circumstances permit:-

- capping of employer contribution rate changes within a pre-determined range (“stabilisation”)
- the use of extended deficit recovery periods
- the phasing in of contribution rises or reductions
- the pooling of contributions amongst employers with similar characteristics
- the use of some form of security or guarantee to justify a lower contribution rate than would otherwise be the case.

These and associated issues are covered in this Section.

The Administering Authority recognises that there may occasionally be particular circumstances affecting individual employers that are not easily managed within the rules and policies set out in the Funding Strategy Statement. Therefore the Administering Authority may, at its sole discretion, direct the actuary to adopt alternative funding approaches on a case by case basis for specific employers.

3.2 The effect of paying contributions below the theoretical level

Employers which are permitted to use one or more of the above methods will often be paying, for a time, contributions less than the theoretical contribution rate. Such employers should appreciate that:

- their true long term liability (i.e. the actual eventual cost of benefits payable to their employees and ex-employees) is not affected by the choice of method,
- lower contributions in the short term will be assumed to incur a greater loss of investment returns on the deficit. Thus, deferring a certain amount of contribution will lead to higher contributions in the long-term, and
- it will take longer to reach full funding, all other things being equal.

Overleaf [\(3.3\)](#) is a summary of how the main funding policies differ for different types of employer, followed by more detailed notes where necessary.

[Section 3.4](#) onwards deals with various other funding issues which apply to all employers.

3.3 The different approaches used for different employers

| Type of Employer | Scheduled Bodies | | Community Admission Bodies and Designating Employers | | Transferee Admission Bodies |
|---|---|--------------------------------------|--|---|---|
| Sub-type | Council Pool | Academies | Open to new entrants | Closed to new entrants | (all) |
| Basis used | Ongoing, assumes long-term Fund participation (see Appendix E) | | Ongoing, but may move to “gilts basis” - see Note (a) | Ongoing, but may move to “gilts basis” - see Note (a) | Ongoing, assumes fixed contract term in the Fund (see Appendix E) |
| Future service rate | Projected Unit Credit approach (see Appendix D – D.2) | | Projected Unit Credit approach if open (see Appendix D – D.2) | Attained Age approach (see Appendix D – D.2) | Projected Unit Credit approach if open, Attained Age otherwise (see Appendix D – D.2) |
| Stabilised rate? | Yes - see Note (b) | Yes - see Note (b) | No | No | No |
| Maximum deficit recovery period – Note (c) | 20 years | 20 years | 15 years – subject to security / covenant check | 15 years – subject to security / covenant check | Outstanding contract term |
| Deficit recovery payments – Note (d) | Monetary amount | Monetary amount | Monetary amount | Monetary amount | Monetary amount |
| Treatment of surplus | Covered by stabilisation arrangement | Covered by stabilisation arrangement | Preferred approach: contributions kept at future service rate. However, reductions may be permitted by the Administering Authority | | Reduce contributions by spreading the surplus over the remaining contract term |
| Phasing of contribution changes | Covered by stabilisation arrangement | Covered by stabilisation arrangement | None | None | None |
| Review of rates – Note (f) | Administering Authority reserves the right to review contribution rates and amounts, and the level of security provided, at regular intervals between valuations | | | | Particularly reviewed in last 3 years of contract |
| New employer | n/a | Note (g) | Note (h) | | Notes (h) & (i) |
| Cessation of participation: cessation debt payable | Cessation is assumed not to be generally possible, as Scheduled Bodies are legally obliged to participate in the LGPS. In the rare event of cessation occurring (machinery of Government changes for example), the cessation debt | | Can be ceased subject to terms of admission agreement. Cessation debt will be calculated on a basis appropriate to the circumstances of cessation – see Note (j) . | | Participation is assumed to expire at the end of the contract. Cessation debt (if any) calculated on ongoing basis. |

| | | | |
|--|---|--|--|
| | principles applied would be as per Note (j) . | | Awarding Authority will be liable for future deficits and contributions arising. |
|--|---|--|--|

Note (a) (Basis for Community Admission Bodies and Designating Employers closed to new entrants)

In the circumstances where:

- the employer is a Designating Employer, or an Admission Body but not a Transferee Admission Body, and
- the employer has no guarantor, and
- the admission agreement is likely to terminate, or the employer is likely to lose its last active member, within a timeframe considered appropriate by the Administering Authority to prompt a change in funding,

the Administering Authority may vary the discount rate used to set employer contribution rate. In particular contributions may be set for an employer to achieve full funding on a more prudent basis (e.g. using a discount rate set equal to gilt yields) by the time the agreement terminates or the last active member leaves, in order to protect other employers in the Fund. This policy will increase regular contributions and reduce, but not entirely eliminate, the possibility of a final deficit payment being required from the employer when a cessation valuation is carried out.

The Administering Authority also reserves the right to adopt the above approach in respect of those Designating Employers and Admission Bodies with no guarantor, where the strength of covenant is considered to be weak but there is no immediate expectation that the admission agreement will cease or the Designating Employer alters its designation.

Note (b) (Stabilisation)

Stabilisation is a mechanism where employer contribution rate variations from year to year are kept within a pre-determined range, thus allowing those employers' rates to be relatively stable. In the interests of stability and affordability of employer contributions, the Administering Authority, on the advice of the Fund Actuary, believes that stabilising contributions can still be viewed as a prudent longer-term approach. However, employers whose contribution rates have been "stabilised" (and may therefore be paying less than their theoretical contribution rate) should be aware of the risks of this approach and should consider making additional payments to the Fund if possible.

This stabilisation mechanism allows short term investment market volatility to be managed so as not to cause volatility in employer contribution rates, on the basis that a long term view can be taken on net cash inflow, investment returns and strength of employer covenant.

The current stabilisation mechanism applies if:

- the employer satisfies the eligibility criteria set by the Administering Authority (see below) and;
- there are no material events which cause the employer to become ineligible, e.g. significant reductions in active membership (due to outsourcing or redundancies), or changes in the nature of the employer (perhaps due to Government restructuring).

On the basis of extensive modelling carried out for the 2013 valuation exercise (see [Section 4](#)), the stabilised details are as follows:

| Type of employer | Council Pool | Academies |
|-------------------|--------------|--------------|
| Max cont increase | +0.5% of pay | +1.0% of pay |
| Max cont decrease | -0.5% of pay | |

The stabilisation criteria and limits will be reviewed at 31 March 2016 valuation, to take effect from 1 April 2017. This will take into account employer membership profiles, the issues surrounding employer security, and other relevant factors.

Note (c) (Deficit Recovery Periods)

The deficit recovery period starts at the commencement of the revised contribution rate (1 April 2014 for the 2013 valuation). The Administering Authority would normally expect the same period to be used at successive triennial valuations, but would reserve the right to propose alternative spreading periods, for example where there were no new entrants.

Where stabilisation applies, the resulting employer contribution rate would be amended to comply with the stabilisation mechanism.

For employers with no (or very few) active members at this valuation, the deficit should be recovered by a fixed monetary amount over a period to be agreed with the body or its successor, not to exceed 20 years.

Note (d) (Deficit Recovery Payments)

For employers where stabilisation is not being applied, the deficit recovery payments for each employer covering the three years' period until the next valuation will be set as monetary amounts.

Note (e) (Regular Reviews)

Such reviews may be triggered by significant events including but not limited to: significant reductions in payroll, altered employer circumstances, Government restructuring affecting the employer's business, or failure to pay contributions or arrange appropriate security as required by the Administering Authority.

The result of a review may be to require increased contributions (by strengthening the actuarial assumptions adopted and/or moving to monetary levels of deficit recovery contributions), and/or an increased level of security or guarantee.

Note (g) (New academy employers)

The Fund's policies on academies' funding issues are as follows:

- a) The new academy will be regarded as a separate employer in its own right and will not be pooled with other employers in the Fund. The only exception is where the academy is part of a Multi Academy Trust (MAT) in which case the academy's figures will be calculated as below but can be combined with those of the other academies in the MAT;
- b) The new academy's past service liabilities on conversion will be calculated based on its active Fund members on the day before conversion. For the avoidance of doubt, these liabilities will include all past service of those members, but will exclude the liabilities relating to any ex-employees of the school who have deferred or pensioner status;

- c) The new academy will be allocated an initial asset share from the ceding council's assets in the Fund. This asset share will be calculated using the estimated funding position of the ceding council at the date of academy conversion. The share will be based on the active members' funding level, having first allocated assets in the council's share to fully fund deferred and pensioner members. The asset allocation will be based on market conditions and the academy's active Fund membership on the day prior to conversion; and
- d) The new academy's initial contribution rate will be calculated using market conditions, the council funding position and, membership data, all as at the day prior to conversion.
- e) For the current valuation period (1 April 2014 to 31 March 2017) the maximum percentage increase in employer's contribution will be limited to 1.0%

Note (h) (New Admission Bodies)

With effect from 1 October 2012, the LGPS 2012 Miscellaneous Regulations introduced mandatory new requirements for all Admission Bodies brought into the Fund from that date. Under these Regulations, all new Admission Bodies will be required to provide some form of security, such as a guarantee from the letting employer, an indemnity or a bond. The security is required to cover some or all of the following:

- the strain cost of any redundancy early retirements resulting from the premature termination of the contract;
- allowance for the risk of asset underperformance;
- allowance for the risk of a fall in gilt yields;
- allowance for the possible non-payment of employer and member contributions to the Fund;
- the current deficit.

For all new Transferee Admission Bodies, the security must be to the satisfaction of the Administering Authority as well as the letting employer, and will be reassessed on an annual basis.

The Administering Authority will only consider requests from Community Admission Bodies (or other similar bodies, such as section 75 NHS partnerships) to join the Fund if they are sponsored by a Scheduled Body with tax raising powers, guaranteeing their liabilities and also providing a form of security as above.

The above approaches reduce the risk to other employers in the Fund, of potentially having to pick up any shortfall in respect of Admission Bodies ceasing to exist with an unpaid deficit.

Note (i) (New Transferee Admission Bodies)

A new TAB usually joins the Fund as a result of the letting/outsourcing of some services from an existing employer (normally a Scheduled Body such as a council or academy) to another organisation (a "contractor"). This involves the TUPE transfer of some staff from the letting employer to the contractor. Consequently, for the duration of the contract, the contractor is a new participating employer in the Fund so that the transferring employees maintain their eligibility for LGPS membership. At the end of the contract the employees revert to the letting employer or to a replacement contractor.

Ordinarily, the TAB would be set up in the Fund as a new employer with responsibility for all the accrued benefits of the transferring employees; in this case, the contractor would usually be assigned an initial asset allocation equal to the past service liability value of the employees' Fund benefits. The quid pro quo is that the contractor is then expected to ensure that its share of the Fund is also fully funded at the end of the contract: see [Note \(j\)](#).

Employers which "outsource" have flexibility in the way that they can deal with the pension risk potentially taken on by the contractor. In particular there are three different routes that such employers may wish to adopt. Clearly as the risk ultimately resides with the employer letting the contract, it is for them to agree the appropriate route with the contractor:

i) Pooling

Under this option the contractor is pooled with the letting employer. In this case, the contractor pays the same rate as the letting employer, which may be under the stabilisation approach.

ii) Letting employer retains pre-contract risks

Under this option the letting employer would retain responsibility for assets and liabilities in respect of service accrued prior to the contract commencement date. The contractor would be responsible for the future liabilities that accrue in respect of transferred staff. The contractor's contribution rate could vary from one valuation to the next. It would be liable for any deficit at the end of the contract term in respect of assets and liabilities attributable to service accrued during the contract term.

iii) Fixed contribution rate agreed

Under this option the contractor pays a fixed contribution rate and doesn't pay any cessation deficit.

The Administering Authority should be informed when any of the above options are exercised. Any risk sharing agreements should be detailed in a side letter to the admission agreement. It may be the case that this details what the contractor is and isn't responsible for, however, note all parties should take their own professional advice. For example the contractor should typically be responsible for pension costs that arise from;

- above average pay increases, including the effect in respect of service prior to contract commencement even if the letting employer takes on responsibility for the latter under (ii) above;
- redundancy and early retirement decisions.

Note (j) (Admission Bodies Ceasing)

Notwithstanding the provisions of the Admission Agreement, the Administering Authority may consider any of the following as triggers for the cessation of an admission agreement with any type of body:

- Last active member ceasing participation in the Fund;
- The insolvency, winding up or liquidation of the Admission Body;
- Any breach by the Admission Body of any of its obligations under the Agreement that they have failed to remedy to the satisfaction of the Fund;
- A failure by the Admission Body to pay any sums due to the Fund within the period required by the Fund; or
- The failure by the Admission Body to renew or adjust the level of the bond or indemnity, or to confirm an appropriate alternative guarantor, as required by the Fund.

On cessation, the Administering Authority will instruct the Fund actuary to carry out a cessation valuation to determine whether there is any deficit or surplus. Where there is a deficit, payment of this amount in full would normally be sought from the Admission Body; where there is a surplus it should be noted that current legislation does not permit a refund payment to the Admission Body.

For non-Transferee Admission Bodies whose participation is voluntarily ended either by themselves or the Fund, or where a cessation event has been triggered, the Administering Authority must look to protect the interests of other ongoing employers. The actuary will therefore adopt an approach which, to the extent reasonably practicable, protects the other employers from the likelihood of any material loss emerging in future:

- a) Where there is a guarantor for future deficits and contributions, the cessation valuation will normally be calculated using the ongoing basis as described in [Appendix E](#);
- b) Alternatively, it may be possible to simply transfer the former Admission Body's liabilities and assets to the guarantor, without needing to crystallise any deficit. This approach may be adopted where the employer cannot pay the contributions due, and this is within the terms of the guarantee;
- c) Where a guarantor does not exist then, in order to protect other employers in the Fund, the cessation liabilities and final deficit will normally be calculated using a "gilts cessation basis", which is more prudent than the ongoing basis. This has no allowance for potential future investment outperformance above gilt yields, and has added allowance for future improvements in life expectancy. This could give rise to significant cessation debts being required.

Under (a) and (c), any shortfall would usually be levied on the departing Admission Body as a single lump sum payment. If this is not possible then the Fund would look to any bond, indemnity or guarantee in place for the employer.

In the event that the Fund is not able to recover the required payment in full, then the unpaid amounts fall to be shared amongst all of the other employers in the Fund. This may require an immediate revision to the Rates and Adjustments Certificate affecting other employers in the Fund, or instead be reflected in the contribution rates set at the next formal valuation following the cessation date.

As an alternative, where the ceasing Admission Body is continuing in business, the Fund at its absolute discretion reserves the right to enter into an agreement with the ceasing Admission Body. Under this agreement the Fund would accept an appropriate alternative security to be held against any deficit, and would carry out the cessation valuation on an ongoing basis: deficit recovery payments would be derived from this cessation debt. This approach would be monitored as part of each triennial valuation: the Fund reserves the right to revert to a "gilts cessation basis" and seek immediate payment of any funding shortfall identified. The Administering Authority may need to seek legal advice in such cases, as the Body would have no contributing members.

3.4 Pooled contributions

From time to time the Administering Authority may set up pools for employers with similar characteristics. This will always be in line with its broader funding strategy.

With the advice of the Actuary the Administering Authority allows smaller employers of similar types to pool their contributions as a way of sharing experience and smoothing out the effects of costly but relatively rare events such as ill-health retirements or deaths in service.

Community Admission Bodies that are deemed by the Administering Authority to have closed to new entrants are not usually permitted to participate in a pool. Transferee Admission Bodies are usually also ineligible for pooling.

Smaller admitted bodies may be pooled with the letting employer, provided all parties (particularly the letting employer) agree.

Employers who are permitted to enter (or remain in) a pool at the 2013 valuation will not normally be advised of their individual contribution rate unless agreed by the Administering Authority.

Schools generally are also pooled with their funding council. However there may be exceptions for specialist or independent schools.

Those employers which have been pooled are identified in the Rates and Adjustments Certificate.

3.5 Additional flexibility in return for added security

The Administering Authority may permit greater flexibility to the employer's contributions if the employer provides added security to the satisfaction of the Administering Authority.

Such flexibility includes a reduced rate of contribution, an extended deficit recovery period, or permission to join a pool with another body (e.g. the Local Authority).

Such security may include, but is not limited to, a suitable bond, a legally-binding guarantee from an appropriate third party, or security over an employer asset of sufficient value.

The degree of flexibility given may take into account factors such as:

- the extent of the employer's deficit;
- the amount and quality of the security offered;
- the employer's financial security and business plan;
- whether the admission agreement is likely to be open or closed to new entrants.

3.6 Non ill health early retirement costs

It is assumed that members' benefits are payable from the earliest age that the employee could retire without incurring a reduction to their benefit (and without requiring their employer's consent to retire). (**NB** the relevant age may be different for different periods of service, following the benefit changes from April 2008 and April 2014). Employers are required to pay additional contributions ('strain') wherever an employee retires before attaining this age. The actuary's funding basis makes no allowance for premature retirement except on grounds of ill-health.

3.7 Ill health early retirement costs

Admitted Bodies will usually have an 'ill health allowance'; Scheduled Bodies may have this also, depending on their agreement terms with the Administering Authority. The Fund monitors each employer's ill health experience on an ongoing basis. If the cumulative cost of ill health retirement in any financial year exceeds the allowance at the previous valuation, the employer will be charged additional contributions on the same basis as apply for non ill-health cases. Details will be included in each separate Admission Agreement.

3.8 Ill health insurance

If an employer provides satisfactory evidence to the Administering Authority of a current insurance policy covering ill health early retirement strains, then:

- the employer's contribution to the Fund each year is reduced by the amount of that year's insurance premium, so that the total contribution is unchanged, and
- there is no need for monitoring of allowances.

The employer must keep the Administering Authority notified of any changes in the insurance policy's coverage or premium terms, or if the policy is ceased.

3.9 Employers with no remaining active members

In general an employer ceasing in the Fund, due to the departure of the last active member, will pay a cessation debt on an appropriate basis (see 3.3, [Note \(j\)](#)) and consequently have no further obligation to the Fund.

Thereafter it is expected that one of two situations will eventually arise:

- a) The employer's asset share runs out before all its ex-employees' benefits have been paid. In this situation the other Fund employers will be required to contribute to pay all remaining benefits: this will be done by the Fund actuary apportioning the remaining liabilities on a pro-rata basis at successive formal valuations;
- b) The last ex-employee or dependant dies before the employer's asset share has been fully utilised. In this situation the remaining assets would be apportioned pro-rata by the Fund's actuary to the other Fund employers.
- c) In exceptional circumstances the Fund may permit an employer with no remaining active members to continue contributing to the Fund. This would require the provision of a suitable security or guarantee, as well as a written ongoing commitment to fund the remainder of the employer's obligations over an appropriate period. The Fund would reserve the right to invoke the cessation requirements in the future, however. The Administering Authority may need to seek legal advice in such cases, as the employer would have no contributing members.

3.10 Policies on bulk transfers

Each case will be treated on its own merits, but in general:

- The Fund will not pay bulk transfers greater than the lesser of (a) the asset share of the transferring employer in the Fund, and (b) the value of the past service liabilities of the transferring members;
- The Fund will not grant added benefits to members bringing in entitlements from another Fund unless the asset transfer is sufficient to meet the added liabilities;
- The Fund may permit shortfalls to arise on bulk transfers if the Fund employer has suitable strength of covenant and commits to meeting that shortfall in an appropriate period. This may require the employer's Fund contributions to increase between valuations.

4 Funding strategy and links to investment strategy

4.1 What is the Fund's investment strategy?

The Fund has built up assets over the years, and continues to receive contribution and other income. All of this must be invested in a suitable manner, which is the investment strategy.

Investment strategy is set by the administering authority, after consultation with the employers and after taking investment advice. The precise mix, manager make up and target returns are set out in the Statement of Investment Principles (SIP), which is available to members and employers.

The investment strategy is set for the long-term, but is reviewed from time to time. Normally a full review is carried out after each actuarial valuation, and is kept under review annually between actuarial valuations to ensure that it remains appropriate to the Fund's liability profile.

The same investment strategy is currently followed for all employers.

4.2 What is the link between funding strategy and investment strategy?

The Fund must be able to meet all benefit payments as and when they fall due. These payments will be met by contributions (resulting from the funding strategy) or asset returns and income (resulting from the investment strategy). To the extent that investment returns or income fall short, then higher cash contributions are required from employers, and vice versa

Therefore, the funding and investment strategies are inextricably linked.

4.3 How does the funding strategy reflect the Fund's investment strategy?

In the opinion of the Fund actuary, the current funding policy is consistent with the current investment strategy of the Fund. The asset outperformance assumption contained in the discount rate (see [E3](#)) is within a range that would be considered acceptable for funding purposes; it is also considered to be consistent with the requirement to take a "prudent longer-term view" of the funding of liabilities as required by the UK Government (see [A1](#)).

However, in the short term – such as the three yearly assessments at formal valuations – there is the scope for considerable volatility and there is a material chance that in the short-term and even medium term, asset returns will fall short of this target. The stability measures described in [Section 3](#) will damp down, but not remove, the effect on employers' contributions.

The Fund does not hold a contingency reserve to protect it against the volatility of equity investments.

4.4 How does this differ for a large stable employer?

The Actuary has developed four key measures which capture the essence of the Fund's strategies, both funding and investment:

- Prudence - the Fund should have a reasonable expectation of being fully funded in the long term;
- Affordability – how much can employers afford;
- Stewardship – the assumptions used should be sustainable in the long term, without having to resort to overly optimistic assumptions about the future to maintain an apparently healthy funding position;
- Stability – employers should not see significant moves in their contribution rates from one year to the next, and this will help to provide a more stable budgeting environment.

The key problem is that the key objectives often conflict. For example, minimising the long term cost of the scheme (i.e. keeping employer rates affordable) is best achieved by investing in higher returning assets e.g. equities. However, equities are also very volatile (i.e. go up and down fairly frequently in fairly large moves), which conflicts with the objective to have stable contribution rates.

Therefore a balance needs to be maintained between risk and reward, which has been considered by the use of Asset Liability Modelling: this is a set of calculation techniques applied by the Fund's actuary, to model the range of potential future solvency levels and contribution rates.

The Actuary was able to model the impact of these four key areas, for the purpose of setting a stabilisation approach (see [3.3Note \(b\)](#)). The modelling demonstrated that retaining the present investment strategy, coupled with constraining employer contribution rate changes as described in [3.3Note \(b\)](#), struck an appropriate balance between the above objectives. In particular the stabilisation approach currently adopted meets the need for stability of contributions without jeopardising the Administering Authority's aims of prudent stewardship of the Fund.

Whilst the current stabilisation mechanism is to remain in place until 2017, it should be noted that this will need to be reviewed following the 2016 valuation.

4.5 Does the Fund monitor its overall funding position?

The Administering Authority monitors the relative funding position, i.e. changes in the relationship between asset values and the liabilities value, quarterly. It reports this to the regular Pension Fund Committee meetings, and also to employers through newsletters and Employers Forums.

Appendix A – Regulatory framework

A1 Why does the Fund need an FSS?

The Department for Communities and Local Government (DCLG) has stated that the purpose of the FSS is:

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

These objectives are desirable individually, but may be mutually conflicting.

The requirement to maintain and publish a FSS is contained in LGPS Regulations which are updated from time to time. In publishing the FSS the Administering Authority has to have regard to any guidance published by Chartered Institute of Public Finance and Accountancy (CIPFA) (most recently in 2012) and to its Statement of Investment Principles.

This is the framework within which the Fund’s actuary carries out triennial valuations to set employers’ contributions and provides recommendations to the Administering Authority when other funding decisions are required, such as when employers join or leave the Fund. The FSS applies to all employers participating in the Fund.

A2 Does the Administering Authority consult anyone on the FSS?

Yes. This is required by LGPS Regulations. It is covered in more detail by the most recent CIPFA guidance, which states that the FSS must first be subject to “consultation with such persons as the authority considers appropriate”, and should include “a meaningful dialogue at officer and elected member level with Council Tax raising authorities and with corresponding representatives of other participating employers”.

In practice, for the Fund, the consultation process for this FSS was as follows:

- a) A draft version of the FSS was issued to all participating employers in January 2014 for comment;
- b) Comments were requested within 14 days;
- c) There was an Employers Forum on 23 January at which questions regarding the FSS could be raised and answered;
- d) Following the end of the consultation period the FSS was updated where required and then published, in March 2014.

A3 How is the FSS published?

The FSS is made available through the following routes:

- Published on the website, at www.harrow.gov.uk
- A copy sent by e-mail to each participating employer in the Fund;
- A copy sent to employee/pensioner representatives;
- A summary issued to all Fund members;
- A full copy included in the annual report and accounts of the Fund;

- Copies sent to investment managers and independent advisers;
- Copies made available on request.

A4 How often is the FSS reviewed?

The FSS is reviewed in detail at least every three years as part of the triennial valuation. This version is expected to remain unaltered until it is consulted upon as part of the formal process for the next valuation in 2016.

It is possible that (usually slight) amendments may be needed within the three year period. These would be needed to reflect any regulatory changes, or alterations to the way the Fund operates (e.g. to accommodate a new class of employer). Any such amendments would be consulted upon as appropriate:

- trivial amendments would be simply notified at the next round of employer communications,
- amendments affecting only one class of employer would be consulted with those employers,
- other more significant amendments would be subject to full consultation.

In any event, changes to the FSS would need agreement by the Pensions Fund Committee and would be included in the relevant Committee Meeting minutes.

A5 How does the FSS fit into other Fund documents?

The FSS is a summary of the Fund's approach to funding liabilities. It is not an exhaustive statement of policy on all issues, for example there are a number of separate statements published by the Fund including the Statement of Investment Principles, Governance Strategy and Communications Strategy. In addition, the Fund publishes an Annual Report and Accounts with up to date information on the Fund.

These documents can be found on the web at www.harrow.gov.uk

Appendix B – Responsibilities of key parties

The efficient and effective operation of the Fund needs various parties to each play their part.

B1 The Administering Authority should:-

- operate the Fund as per the LGPS Regulations;
- effectively manage any potential conflicts of interest arising from its dual role as Administering Authority and a Fund employer;
- collect employer and employee contributions, and investment income and other amounts due to the Fund;
- ensure that cash is available to meet benefit payments as and when they fall due;
- pay from the Fund the relevant benefits and entitlements that are due;
- invest surplus monies (i.e. contributions and other income which are not immediately needed to pay benefits) in accordance with the Fund's Statement of Investment Principles (SIP) and LGPS Regulations;
- communicate appropriately with employers so that they fully understand their obligations to the Fund;
- take appropriate measures to safeguard the Fund against the consequences of employer default;
- manage the valuation process in consultation with the Fund's actuary;
- prepare and maintain a FSS and a SIP, after consultation;
- notify the Fund's actuary of material changes which could affect funding (this is covered in a separate agreement with the actuary); and
- monitor all aspects of the fund's performance and funding and amend the FSS/SIP as necessary and appropriate.

B2 The Individual Employer should:-

- deduct contributions from employees' pay correctly;
- pay all contributions, including their own as determined by the actuary, promptly by the due date;
- have a policy and exercise discretions within the regulatory framework;
- make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits, early retirement strain; and
- notify the Administering Authority promptly of all changes to its circumstances, prospects or membership, which could affect future funding.

B3 The Fund Actuary should:-

- prepare valuations, including the setting of employers' contribution rates. This will involve agreeing assumptions with the Administering Authority, having regard to the FSS and LGPS Regulations, and targeting each employer's solvency appropriately;
- provide advice relating to new employers in the Fund, including the level and type of bonds or other forms of security (and the monitoring of these);
- prepare advice and calculations in connection with bulk transfers and individual benefit-related matters;
- assist the Administering Authority in considering possible changes to employer contributions between formal valuations, where circumstances suggest this may be necessary;

- advise on the termination of Admission Bodies' participation in the Fund; and
- fully reflect actuarial professional guidance and requirements in the advice given to the Administering Authority.

B4 Other parties:-

- investment advisers (either internal or external) should ensure the Fund's SIP remains appropriate, and consistent with this FSS;
- investment managers, custodians and bankers should all play their part in the effective investment (and dis-investment) of Fund assets, in line with the SIP;
- auditors should comply with their auditing standards, ensure Fund compliance with all requirements, monitor and advise on fraud detection, and sign off annual reports and financial statements as required;
- governance advisers may be appointed to advise the Administering Authority on efficient processes and working methods in managing the Fund;
- legal advisers (either internal or external) should ensure the Fund's operation and management remains fully compliant with all regulations and broader local government requirements, including the Administering Authority's own procedures.

Appendix C – Key risks and controls

C1 Types of risk

The Administering Authority has an active risk management programme in place. The measures that it has in place to control key risks are summarised below under the following headings:

- financial;
- demographic;
- regulatory; and
- governance.

C2 Financial risks

| Risk | Summary of Control Mechanisms |
|--|---|
| Fund assets fail to deliver returns in line with the anticipated returns underpinning valuation of liabilities over the long-term. | <p>Only anticipate long-term return on a relatively prudent basis to reduce risk of under-performing.</p> <p>Assets invested on the basis of specialist advice, in a suitably diversified manner across asset classes, geographies, managers, etc.</p> <p>Analyse progress at three yearly valuations for all employers.</p> <p>Inter-valuation roll-forward of liabilities between valuations at whole Fund level.</p> |
| Inappropriate long-term investment strategy. | <p>Overall investment strategy options considered as an integral part of the funding strategy. Used asset liability modelling to measure 4 key outcomes.</p> <p>Chosen option considered to provide the best balance.</p> |
| Fall in risk-free returns on Government bonds, leading to rise in value placed on liabilities. | <p>Stabilisation modelling at whole Fund level allows for the probability of this within a longer term context.</p> <p>Inter-valuation monitoring, as above.</p> <p>Some investment in bonds helps to mitigate this risk.</p> |
| Active investment manager under-performance relative to benchmark. | <p>Quarterly investment monitoring analyses market performance and active managers relative to their index benchmark.</p> |
| Pay and price inflation significantly more than anticipated. | <p>The focus of the actuarial valuation process is on real returns on assets, net of price and pay increases.</p> <p>Inter-valuation monitoring, as above, gives early warning.</p> <p>Some investment in bonds also helps to mitigate this</p> |

| Risk | Summary of Control Mechanisms |
|--|--|
| | <p>risk.</p> <p>Employers pay for their own salary awards and should be mindful of the geared effect on pension liabilities of any bias in pensionable pay rises towards longer-serving employees.</p> |
| Effect of possible increase in employer's contribution rate on service delivery and admission/scheduled bodies | An explicit stabilisation mechanism has been agreed as part of the funding strategy. Other measures are also in place to limit sudden increases in contributions. |
| Orphaned employers give rise to added costs for the Fund | <p>The Fund seeks a cessation debt (or security/guarantor) to minimise the risk of this happening in the future.</p> <p>If it occurs, the Actuary calculates the added cost spread pro-rata among all employers – (see 3.9).</p> |

C3 Demographic risks

| Risk | Summary of Control Mechanisms |
|--|--|
| Pensioners living longer, thus increasing cost to Fund. | <p>Set mortality assumptions with some allowance for future increases in life expectancy.</p> <p>The Fund Actuary has direct access to the experience of over 50 LGPS funds which allows early identification of changes in life expectancy that might in turn affect the assumptions underpinning the valuation.</p> |
| Maturing Fund – i.e. proportion of actively contributing employees declines relative to retired employees. | Continue to monitor at each valuation, consider seeking monetary amounts rather than % of pay and consider alternative investment strategies. |
| Deteriorating patterns of early retirements | <p>Employers are charged the extra cost of non ill-health retirements following each individual decision.</p> <p>Employer ill health retirement experience is monitored, and insurance is an option.</p> |
| Reductions in payroll causing insufficient deficit recovery payments | <p>In many cases this may not be sufficient cause for concern, and will in effect be caught at the next formal valuation. However, there are protections where there is concern, as follows:</p> <p>Employers in the stabilisation mechanism may be brought out of that mechanism to permit appropriate contribution increases (see Note (b) to 3.3).</p> <p>For other employers, review of contributions is</p> |

| Risk | Summary of Control Mechanisms |
|------|--|
| | permitted in general between valuations (see Note (f) to 3.3) and may require a move in deficit contributions from a percentage of payroll to fixed monetary amounts. |

C4 Regulatory risks

| Risk | Summary of Control Mechanisms |
|---|---|
| Changes to national pension requirements and/or HMRC rules e.g. changes arising from public sector pensions reform. | <p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>The results of the most recent reforms have been built into the 2013 valuation. Any changes to member contribution rates or benefit levels will be carefully communicated with members to minimise possible opt-outs or adverse actions.</p> |

C5 Governance risks

| Risk | Summary of Control Mechanisms |
|---|--|
| Administering Authority unaware of structural changes in an employer's membership (e.g. large fall in employee members, large number of retirements) or not advised of an employer closing to new entrants. | <p>The Administering Authority has a close relationship with employing bodies and communicates required standards e.g. for submission of data.</p> <p>The Actuary may revise the Rates and Adjustments Certificate to increase an employer's contributions (under Regulation 38) between triennial valuations</p> <p>Deficit contributions may be expressed as monetary amounts.</p> |
| Actuarial or investment advice is not sought, or is not heeded, or proves to be insufficient in some way | <p>The Administering Authority maintains close contact with its specialist advisers.</p> <p>Advice is delivered via formal meetings involving Elected Members, and recorded appropriately.</p> <p>Actuarial advice is subject to professional requirements such as peer review.</p> |
| Administering Authority failing to commission the Fund Actuary to carry out a termination valuation for a departing Admission Body. | <p>The Administering Authority requires employers with relevant contractors to inform it of forthcoming changes.</p> <p>Community Admission Bodies' memberships are monitored and, if active membership decreases, steps</p> |

| Risk | Summary of Control Mechanisms |
|---|---|
| | will be taken. |
| An employer ceasing to exist with insufficient funding or adequacy of a bond. | <p>The Administering Authority believes that it would normally be too late to address the position if it was left to the time of departure.</p> <p>The risk is mitigated by:</p> <p>Seeking a funding guarantee from another scheme employer, or external body, wherever possible (see Notes (h) and (j) to 3.3).</p> <p>Alerting the prospective employer to its obligations and encouraging it to take independent actuarial advice.</p> <p>Vetting prospective employers before admission.</p> <p>Where permitted under the regulations requiring a bond to protect the Fund from various risks.</p> <p>Requiring new Community Admission Bodies to have a guarantor.</p> <p>Reviewing bond or guarantor arrangements at regular intervals (see Note (f) to 3.3).</p> <p>Reviewing contributions well ahead of cessation if thought appropriate (see Note (a) to 3.3).</p> |

Appendix D – The calculation of employer contributions

In [Section 2](#) there was a broad description of the way in which contribution rates are calculated. This Appendix considers these calculations in much more detail.

The calculations involve actuarial assumptions about future experience, and these are described in detail in [Appendix E](#).

D1 What is the difference between calculations across the whole Fund and calculations for an individual employer?

Employer contributions are normally made up of two elements:

- a) the estimated cost of future benefits being accrued, referred to as the “future service rate”; plus
- b) an adjustment for the funding position of accrued benefits relative to the Fund’s solvency target, “*past service adjustment*”. If there is a surplus there may be a reduction in the employer’s contribution rate. If there is a deficit there will be an increase in the employer’s contribution rate, with the surplus or deficit spread over an appropriate period. The aim is to return the employer to full funding over that period. See [Section 3](#) for deficit recovery periods.

The Fund’s actuary is required by the regulations to report the *Common Contribution Rate*¹, for all employers collectively at each triennial valuation. It combines items (a) and (b) and is expressed as a percentage of pay; it is in effect an average rate across all employers in the Fund.

The Fund’s actuary is also required to adjust the Common Contribution Rate for circumstances which are deemed “peculiar” to an individual employer². It is the adjusted contribution rate which employers are actually required to pay. The sorts of “peculiar” factors which are considered are discussed below.

In effect, the *Common Contribution Rate* is a notional quantity. Separate future service rates are calculated for each employer together with individual past service adjustments according to employer-specific past service deficit spreading and increased employer contribution phasing periods.

D2 How is the Future Service Rate calculated?

The future service element of the employer contribution rate is calculated with the aim that these contributions will meet benefit payments in respect of members’ **future** service in the Fund. This is based upon the cost (in excess of members’ contributions) of the benefits which employee members earn from their service each year.

The future service rate is calculated separately for all the employers, although employers within a pool will pay the contribution rate applicable to the pool as a whole. The calculation is on the “ongoing” valuation basis (see [Appendix E](#)), but where it is considered appropriate to do so the Administering Authority reserves the right to set a future service rate by reference to liabilities valued on a more prudent basis (see [Section 3](#)).

The approach used to calculate each employer’s future service contribution rate depends on whether or not new entrants are being admitted. Employers should note that it is only Admission Bodies and Designating Employers that may have the power not to automatically admit all eligible new staff to the Fund, depending on the terms of their Admission Agreements and employment contracts.

¹ See LGPS (Administration) Regulations 36(5).

² See LGPS (Administration) Regulations 36(7).

a) Employers which admit new entrants

These rates will be derived using the “Projected Unit Method” of valuation with a one year period, i.e. only considering the cost of the next year’s benefit accrual and contribution income. If future experience is in line with assumptions, and the employer’s membership profile remains stable, this rate should be broadly stable over time. If the membership of employees matures (e.g. because of lower recruitment) the rate would rise over time.

b) Employers which do not admit new entrants

To give more long term stability to such employers’ contributions, the “Attained Age” funding method is normally adopted. This measures benefit accrual and contribution income over the whole future anticipated working lifetimes of current active employee members.

Both approaches include expenses of administration to the extent that they are borne by the Fund, and include allowances for benefits payable on death in service and ill health retirement.

D3 How is the Solvency / Funding Level calculated?

The Fund’s actuary is required to report on the “solvency” of the whole Fund in a valuation which should be carried out at least once every three years. As part of this valuation, the actuary will calculate the solvency position of each employer.

‘Solvency’ is defined to be the ratio of the market value of the employer’s asset share to the value placed on accrued benefits on the Fund actuary’s chosen assumptions. This quantity is known as a funding level.

For the value of the employer’s asset share, see [D5](#) below.

For the value of benefits, the Fund actuary agrees the assumptions to be used with the Administering Authority – see [Appendix E](#). These assumptions are used to calculate the present value of all benefit payments expected in the future, relating to that employer’s current and former employees, based on pensionable service to the valuation date only (i.e. ignoring further benefits to be built up in the future).

The Fund operates the same target funding level for all employers of 100% of its accrued liabilities valued on the ongoing basis, unless otherwise determined (see [Section 3](#)).

D4 What affects a given employer’s valuation results?

The results of these calculations for a given individual employer will be affected by:

- past contributions relative to the cost of accruals of benefits;
- different liability profiles of employers (e.g. mix of members by age, gender, service vs. salary);
- the effect of any differences in the valuation basis on the value placed on the employer’s liabilities;
- any different deficit/surplus spreading periods or phasing of contribution changes;
- the difference between actual and assumed rises in pensionable pay;
- the difference between actual and assumed increases to pensions in payment and deferred pensions;
- the difference between actual and assumed retirements on grounds of ill-health from active status;
- the difference between actual and assumed amounts of pension ceasing on death;
- the additional costs of any non ill-health retirements relative to any extra payments made;

over the period between each triennial valuation.

Actual investment returns achieved on the Fund between each valuation are applied proportionately across all employers, to the extent that employers in effect share the same investment strategy. Transfers of liabilities between employers within the Fund occur automatically within this process, with a sum broadly equivalent to the reserve required on the ongoing basis being exchanged between the two employers.

D5 How is each employer's asset share calculated?

The Administering Authority does not account for each employer's assets separately. Instead, the Fund's actuary is required to apportion the assets of the whole Fund between the employers, at each triennial valuation.

This apportionment uses the income and expenditure figures provided for certain cash flows for each employer. This process adjusts for transfers of liabilities between employers participating in the Fund, but does make a number of simplifying assumptions. The split is calculated using an actuarial technique known as "analysis of surplus".

The Fund actuary does not allow for certain relatively minor events, including but not limited to:

- the actual timing of employer contributions within any financial year;
- the effect of the premature payment of any deferred pensions on grounds of incapacity.

These effects are swept up within a miscellaneous item in the analysis of surplus, which is split between employers in proportion to their liabilities.

The methodology adopted means that there will inevitably be some difference between the asset shares calculated for individual employers and those that would have resulted had they participated in their own ring-fenced section of the Fund.

The asset apportionment is capable of verification but not to audit standard. The Administering Authority recognises the limitations in the process, but it considers that the Fund actuary's approach addresses the risks of employer cross-subsidisation to an acceptable degree.

Appendix E – Actuarial assumptions

E1 What are the actuarial assumptions?

These are expectations of future experience used to place a value on future benefit payments (“the liabilities”). Assumptions are made about the amount of benefit payable to members (the financial assumptions) and the likelihood or timing of payments (the demographic assumptions). For example, financial assumptions include investment returns, salary growth and pension increases; demographic assumptions include life expectancy, probabilities of ill-health early retirement, and proportions of member deaths giving rise to dependants’ benefits.

Changes in assumptions will affect the measured value of future service accrual and past service liabilities, and hence the measured value of the past service deficit. However, different assumptions will not of course affect the actual benefits payable by the Fund in future.

The combination of all assumptions is described as the “basis”. A more optimistic basis might involve higher assumed investment returns (discount rate), or lower assumed salary growth, pension increases or life expectancy; a more optimistic basis will give lower liability values and lower employer costs. A more prudent basis will give higher liability values and higher employer costs.

E2 What basis is used by the Fund?

The Fund’s standard funding basis is described as the “ongoing basis”, which applies to most employers in most circumstances. This is described in more detail below. It anticipates employers remaining in the Fund in the long term.

However, in certain circumstances, typically where the employer is not expected to remain in the Fund long term, a more prudent basis applies: see [Note \(a\)](#) to [3.3](#).

E3 What assumptions are made in the ongoing basis?

a) Investment return / discount rate

The key financial assumption is the anticipated return on the Fund’s investments. This “discount rate” assumption makes allowance for an anticipated out-performance of Fund returns relative to long term yields on UK Government bonds (“gilts”). There is, however, no guarantee that Fund returns will out-perform gilts. The risk is greater when measured over short periods such as the three years between formal actuarial valuations, when the actual returns and assumed returns can deviate sharply.

Given the very long-term nature of the liabilities, a long term view of prospective asset returns is taken. The long term in this context would be 20 to 30 years or more.

For the purpose of the triennial funding valuation at 31 March 2013 and setting contribution rates effective from 1 April 2014, the Fund actuary has assumed that future investment returns earned by the Fund over the long term will be 1.6% per annum greater than gilt yields at the time of the valuation (this is the same as that used at the 2010 valuation). In the opinion of the Fund actuary, based on the current investment strategy of the Fund, this asset out-performance assumption is within a range that would be considered acceptable for the purposes of the funding valuation.

b) Salary growth

Pay for public sector employees is currently subject to restriction by the UK Government until 2016. Although this “pay freeze” does not officially apply to local government and associated employers, it has been suggested that they are likely to show similar restraint in respect of pay awards. Based on long term historical analysis of the membership in LGPS funds, the salary increase assumption at the 2013 valuation has been set to 0.5%

above the retail prices index (RPI) per annum. This is a change from the previous valuation, which assumed a three year restriction at 1% per annum followed by longer term growth at CPI plus 1.5% per annum.

c) Pension increases

Since 2011 the consumer prices index (CPI), rather than RPI, has been the basis for increases to public sector pensions in deferment and in payment. This change was allowed for in the valuation calculations as at 31 March 2010. Note that the basis of such increases is set by the Government, and is not under the control of the Fund or any employers.

As at the previous valuation, we derive our assumption for RPI from market data as the difference between the yield on long-dated fixed interest and index-linked government bonds. This is then reduced to arrive at the CPI assumption, to allow for the “formula effect” of the difference between RPI and CPI. At this valuation, we propose a reduction of 0.8% per annum. This is a larger reduction than at 2010, which will serve to reduce the value placed on the Fund’s liabilities (all other things being equal).

d) Life expectancy

The demographic assumptions are intended to be best estimates of future experience in the Fund based on past experience of LGPS funds which participate in Club Vita, the longevity analytics service used by the Fund, and endorsed by the actuary.

The longevity assumptions that have been adopted at this valuation are a bespoke set of “VitaCurves”, produced by the Club Vita’s detailed analysis, which are specifically tailored to fit the membership profile of the Fund. These curves are based on the data provided by the Fund for the purposes of this valuation.

It is acknowledged that future life expectancy and, in particular, the allowance for future improvements in life expectancy, is uncertain. There is a consensus amongst actuaries, demographers and medical experts that life expectancy is likely to improve in the future. Allowance has been made in the ongoing valuation basis for future improvements in line with “medium cohort” and a 1.25% per annum minimum underpin to future reductions in mortality rates. This is a higher allowance for future improvements than was made in 2010.

e) General

The same financial assumptions are adopted for all employers, in deriving the past service deficit and the future service rate: as described in (3.3), these calculated figures are translated in different ways into employer contributions, depending on the employer’s circumstances.

The demographic assumptions, in particular the life expectancy assumption, in effect vary by type of member and so reflect the different membership profiles of employers.

Appendix F – Glossary

| | |
|---------------------------------------|---|
| Actuarial assumptions/basis | The combined set of assumptions made by the actuary, regarding the future, to calculate the value of liabilities . The main assumptions will relate to the discount rate , salary growth, pension increases and longevity. More prudent assumptions will give a higher liability value, whereas more optimistic assumptions will give a lower value. |
| Administering Authority | The council with statutory responsibility for running the Fund, in effect the Fund's "trustees". |
| Admission Bodies | Employers which voluntarily participate in the Fund, so that their employees and ex-employees are members . There will be an Admission Agreement setting out the employer's obligations. For more details (see 2.5). |
| Common contribution rate | The Fund-wide future service rate plus past service adjustment . It should be noted that this will differ from the actual contributions payable by individual employers . |
| Covenant | The assessed financial strength of the employer. A strong covenant indicates a greater ability (and willingness) to pay for pension obligations in the long run. A weaker covenant means that it appears that the employer may have difficulties meeting its pension obligations in full over the longer term. |
| Deficit | The shortfall between the assets value and the liabilities value. This relates to assets and liabilities built up to date, and ignores the future build-up of pension (which in effect is assumed to be met by future contributions). |
| Deficit repair/recovery period | The target length of time over which the current deficit is intended to be paid off. A shorter period will give rise to a higher annual past service adjustment (deficit repair contribution), and vice versa. |
| Designating Employer | Employers such as town and parish councils that are able to participate in the LGPS via resolution. These employers can designate which of their employees are eligible to join the Fund. |
| Discount rate | The annual rate at which future assumed cashflows (in and out of the Fund) are discounted to the present day. This is necessary to provide a liabilities value which is consistent with the present day value of the assets, to calculate the deficit . A lower discount rate gives a higher liabilities value, and vice versa. It is similarly used in the calculation of the future service rate and the common contribution rate . |
| Employer | An individual participating body in the Fund, which employs (or used to employ) members of the Fund. Normally the assets and liabilities values for each employer are individually tracked, together with its future service rate at each valuation . |
| Funding level | The ratio of assets value to liabilities value: for further details (see 2.2). |
| Future service rate | The actuarially calculated cost of each year's build-up of pension by the current active members , excluding members' contributions but including Fund administrative expenses. This is calculated using a chosen set of actuarial |

assumptions.

| | |
|--------------------------------|---|
| Gilt | A UK Government bond, i.e. a promise by the Government to pay interest and capital as per the terms of that particular gilt, in return for an initial payment of capital by the purchaser. Gilts can be “fixed interest”, where the interest payments are level throughout the gilt’s term, or “index-linked” where the interest payments vary each year in line with a specified index (usually RPI). Gilts can be bought as assets by the Fund, but their main use in funding is as an objective measure of solvency. |
| Guarantee / guarantor | A formal promise by a third party (the guarantor) that it will meet any pension obligations not met by a specified employer. The presence of a guarantor will mean, for instance, that the Fund can consider the employer’s covenant to be as strong as its guarantor’s. |
| Letting employer | An employer which outsources or transfers a part of its services and workforce to another employer (usually a contractor). The contractor will pay towards the LGPS benefits accrued by the transferring members, but ultimately the obligation to pay for these benefits will revert to the letting employer. A letting employer will usually be a local authority, but can sometimes be another type of employer such as an academy. |
| Liabilities | The actuarially calculated present value of all pension entitlements of all members of the Fund, built up to date. This is compared with the present market value of Fund assets to derive the deficit . It is calculated on a chosen set of actuarial assumptions . |
| LGPS | The Local Government Pension Scheme, a public sector pension arrangement put in place via Government Regulations, for workers in local government. These Regulations also dictate eligibility (particularly for Scheduled Bodies), members’ contribution rates, benefit calculations and certain governance requirements. The LGPS is divided into 101 Funds which map the UK. Each LGPS Fund is autonomous to the extent not dictated by Regulations, e.g. regarding investment strategy, employer contributions and choice of advisers. |
| Maturity | A general term to describe a Fund (or an employer’s position within a Fund) where the members are closer to retirement (or more of them already retired) and the investment time horizon is shorter. This has implications for investment strategy and, consequently, funding strategy. |
| Members | The individuals who have built up (and may still be building up) entitlement in the Fund. They are divided into actives (current employee members), deferreds (ex-employees who have not yet retired) and pensioners (ex-employees who have now retired, and dependants of deceased ex-employees). |
| Past service adjustment | The part of the employer’s annual contribution which relates to past service deficit repair. |
| Pooling | Employers may be grouped together for the purpose of calculating contribution rates, so that their combined membership and asset shares are used to calculate a single contribution rate applicable to all employers in the pool. A pool may still |

require each individual employer to ultimately pay for its own share of **deficit**, or (if formally agreed) it may allow **deficits** to be passed from one employer to another. For further details of the Fund's current pooling policy (see [3.4](#)).

| | |
|--|---|
| Profile | The profile of an employer's membership or liability reflects various measurements of that employer's members , i.e. current and former employees. This includes: the proportions which are active, deferred or pensioner; the average ages of each category; the varying salary or pension levels; the lengths of service of active members vs their salary levels, etc. A membership (or liability) profile might be measured for its maturity also. |
| Rates and Adjustments Certificate | A formal document required by the LGPS Regulations, which must be updated at least every three years at the conclusion of the formal valuation . This is completed by the actuary and confirms the contributions to be paid by each employer (or pool of employers) in the Fund for the three year period until the next valuation is completed. |
| Scheduled Bodies | Types of employer explicitly defined in the LGPS Regulations, whose employers must be offered membership of their local LGPS Fund. These include councils, colleges, universities, academies, police and fire authorities etc, other than employees who have entitlement to a different public sector pension scheme (e.g. teachers, police and fire officers, university lecturers). |
| Solvency | In a funding context, this usually refers to a 100% funding level , i.e. where the assets value equals the liabilities value. |
| Stabilisation | Any method used to smooth out changes in employer contributions from one year to the next. This is very broadly required by the LGPS Regulations, but in practice is particularly employed for large stable employers in the Fund. Different methods may involve: probability-based modelling of future market movements; longer deficit recovery periods; higher discount rates; or some combination of these. |
| Theoretical contribution rate | The employer's contribution rate, including both future service rate and past service adjustment , which would be calculated on the standard actuarial basis , before any allowance for stabilisation or other agreed adjustment. |
| Valuation | An actuarial investigation to calculate the liabilities, future service contribution rate and common contribution rate for a Fund, and usually individual employers too. This is normally carried out in full every three years (last done as at 31 March 2013), but can be approximately updated at other times. The assets value is based on market values at the valuation date, and the liabilities value and contribution rates are based on long term bond market yields at that date also. |

London Borough of Harrow Pension Fund

Report to the Governance, Audit, Risk
Management and Standards Committee for the
year ended 31 March 2015 Pension Fund
Audit

the
Distinctive
audit

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The big picture

The Big Picture

We have pleasure in setting out in this document our report to the Governance, Audit, Risk Management and Standards Committee of the London Borough of Harrow Pension Fund for the year ended 31 March 2015 for discussion at the meeting scheduled for 10 September 2015. This report summarises the principal matters that have arisen from our audit for the year ended 31 March 2015.

This summary is not intended to be exhaustive but highlights the most significant matters to which we would like to bring your attention. It should, therefore, be read in conjunction with the report and the appendices thereto.

Audit Scope

The scope of our audit is unchanged from the previous period and from the scope set out in our Planning Report in March 2015.

Our reporting responsibilities as auditor of the Fund are to:

- Form an opinion on the financial statements which are prepared under CIPFA/ LASAAC Code of Practice on Local Authority Accounting in the United Kingdom (“the Code of Practice”).
- Report to “those charged with governance” on certain additional matters, including any adjusted and unadjusted errors identified by our audit, our independence and any other issues we consider should be brought to their attention.

Significant representations

A copy of the representation letter to be signed on behalf of the Governance, Audit, Risk Management and Standards Committee has been included in Appendix 1 of this report. There are no new representations to highlight to those included in the 2014 audit.

Independence

We have identified no matters which would affect our independence as auditor. Our reporting requirements in respect of independence matters, including fees, are covered in Appendix 4.

“I am delighted to present our final report on the findings from our 2014/15 audit.”

Paul Schofield, Audit Partner

A reminder of our audit plan:

Materiality: £6.7m, (2013/14: £5.9m).

Threshold for reporting misstatements: £0.34m, (2013/14: £0.30m).

Four significant risks have been identified:

- completeness and accuracy of contributions;
- accuracy of benefit calculations;
- valuations of investments; and
- management override of controls.

We have not made any significant changes to our audit plan.

The Big Picture (continued)

Status of the audit

We are satisfied that the status of the audit is as expected at this stage of the timetable agreed in our audit plan.

We have substantially completed our audit work in accordance with our Audit Plan, which was presented to you prior to the commencement of the audit, subject to the satisfactory completion of the matters set out below:

- Receipt and review of the final version of the Pension Fund Annual Report and Financial Statements;
- Receipt of confirmation that there are no control weaknesses at State Street, Oldfields, Blackrock and Aviva, covering the period between the internal controls report and the pension fund year end;
- Receipt of management's final representation letter;
- Completion of our internal quality control procedures; and
- Completion of our subsequent events review to the date of signing the Annual Report and Financial Statements.

We will report to you verbally in respect of any modifications to the findings or opinions contained in this report that arise on completion of these matters.

At the date of this report and subject to the satisfactory completion of the outstanding matters referred to above, we intend on issuing an unmodified audit opinion.



Significant audit risks

This section explains the nature of the significant risks we have identified, how these risks have been addressed by our audit work and our conclusions. We also explain related presentational and disclosure matters within the annual report and financial statements.

1. Completeness and accuracy of contributions

Significant audit risk

Nature of risk

Unlike the position in the private sector, we are not required to issue a separate statement on contributions for the Fund.

Contributions for the year ended 31 March 2015 were £28.0m (2014: £25.5m), showing that this is a material income stream for the Pension Fund. This is expected to continue in the current period with the continued active membership paying contributions. Due to the complexity introduced by the participation of more than one employer in the Fund, together with the past introduction of tiered contribution rates; we have identified contributions as a specific risk.

Impact on the financial statements and our audit challenge

Errors in processing contributions can lead to issues such as deducting incorrect amounts from active members' payroll, which can be costly to rectify and result in reputational damage.

Work completed to address the significant risk

We have performed the following testing to address the significant risks around contributions:

- reviewed the design and implementation of controls present in the Fund for ensuring contributions from all Scheduled and Admitted bodies are identified and calculated correctly;
- we performed sample tests of details to test whether each material income stream was calculated in accordance with the actuarial valuation and schedule of rates;
- we developed an expectation based on changes in membership numbers and contribution rates to analytically review the contributions received in the year;
- reconciled the membership movements in the year to the Financial Statements, ensuring that these included members from the admitted bodies; and
- detailed substantive testing has been performed to test that employer and employee bandings had been applied correctly, and that the monthly contribution collected for the sample selected had been calculated correctly. No issues were noted from the testing performed.

All testing was completed with satisfactory results.

Deloitte view

We have formed a satisfactory conclusion in this area. There are no issues noted based on results from the procedures performed.

2. Accuracy of benefit calculations

Significant audit risk

Nature of risk

The complexities surrounding the calculation of both benefits in retirement and ill health and death benefits remains a key area of audit risk.

In respect of benefits in retirement, benefits are accumulated on two different bases for service pre and post 1 April 2008; the calculation of the pensionable pay on which benefits will depend may be varied by the individual opting to take account of pay earned in any of the 10 years prior to retirement; and individuals now enjoy greater flexibility in their choice of the mix of pension and lump sum.

In respect of ill health and death benefits, the calculation of the pensionable pay on which benefits will depend may be varied by the same options as discussed above.

In the year ended 31 March 2015, total benefits paid were £32.0m (2013/14: £31.3m). The quantity of individual calculations and complexity of these calculations results in a risk of material misstatement.

Impact on the financial statements and our audit challenge

Incorrect benefit calculations or making payments to members who are not eligible can lead to misstatements in the Financial Statements, financial loss, pensioner's being wrongly paid and reputational damage.

Work completed to address the focus area

The following tests were performed to address the significant risk around benefits:

- we reviewed the design and implementation of controls present at the Fund for ensuring the accuracy, completeness and validity of benefits through discussion with the pensions team and testing that controls were in force during the year under review;
- we obtained a schedule of benefits paid and selected a sample of benefits for detailed testing. The sample was tested through agreement to supporting documentation and review of the calculation, by reference to the qualifying service, Fund rules and benefit choices made by the member; and
- we developed an expectation based on the prior year balance, adjusted for changes in membership numbers and pension increases to analytically review the pension benefits paid in the year.

Deloitte view

We have formed a satisfactory conclusion in this area based on the results from the procedures performed. There are no matters to bring to the attention of the Committee.

3. Valuation of investments

Significant audit risk

Nature of risk

The scheme had investments of £670.9m (2014: £584.9m) as at 31 March 2015 and therefore a small degree of error in their valuation represents a significant risk of material misstatement.

This risk is compounded by two factors. The first of these is the use of investments in unquoted investment vehicles, like private equity houses (2015: £23.0m; 2014: £24.6m), and the use of open forward currency derivatives within the scheme (2015: net liability of £2.6m; 2014: net asset of £1.1m). The other is the significant changes to the portfolio of investment managers.

Private equity funds are complex to value and include an element of judgement on the part of the investment manager. Derivatives are similarly considered to be a higher risk area due to the complexity involved in their valuation.

Impact on the financial statements and our audit challenge

Incorrect valuations of investments can lead to misstatements in the financial statements impacting investment decisions and future recovery plans.

Audit procedures completed to address the focus area

The following tests were performed to address the significant risks:

- we have reviewed the design and implementation of controls present at the Fund for ensuring investments are valued correctly;
- we reviewed the internal control reports to gain an understanding of the control environment at the investment managers and reviewed management's consideration of these reports;
- we reconciled the total value of the investments held by the Fund as reported in the Net Assets Statement to independent confirmations received directly from the investment managers;
- we have performed a test of detail on a sample basis of quoted investment and compared the value reported to the quoted price obtained from Bloomberg, DataStream or other third party sources;
- we performed an analytical review on the performance of the portfolio by comparing to available benchmarks;
- we carried out sample testing on sales and purchases made in the year, and confirmed the completeness of transfers between investment managers by agreeing a sample of sale transactions from investment manager reports through to bank statements and general ledger schedules;
- we have engaged our internal financial instrument experts to both review the accuracy of the valuation of derivatives held by the Fund, and to ensure our testing approach was appropriate given the Fund's specific investment strategy and portfolio; and
- we obtained an understanding of the valuation of private equity investments through discussion with the investment manager. The private equity investment manager valuation was obtained for the quarter to 31 December 2014 and this was compared to the audited financial statements for the year ended 31 December 2014 to determine the investment manager's ability to forecast valuations. The percentage difference was extrapolated to the valuation as at 31 March 2015 to determine the possibility of a material misstatement.

Deloitte view

No issues were identified from the testing performed.

We confirm there are no matters we wish to bring to the attention of the Committee.

4. Management override of controls

Significant audit risk

Nature of risk

International Standards on Auditing requires auditors to identify a presumed risk of management override of control. This presumed risk cannot be rebutted by the auditor. This recognises that management may be able to override controls that are in place to prevent inaccurate or even fraudulent financial reports.

Work completed to address the significant risk

Our audit work included:

- we reviewed the controls around the financial reporting process, including segregation of duties, existence of reporting manuals, reviews and processing and approval of journal entries;
- we have performed substantive testing on journal entries to confirm that they have a genuine, supportable rationale;
- we have reviewed ledgers for unusual items and on a test basis investigated the rationale of any such postings;
- we have reviewed significant management estimates and judgements, such as valuation of investments, and consider whether they are reasonable; and
- we reviewed and challenged the financial statements and management judgements against the LGPS and applicable UK pension regulations.

Deloitte view

There are no matters to bring to the attention of the Committee.

We have not identified any significant judgements or estimates used by management and there is no indication of significant bias.

Insight - Internal control and risk management

In this section we set out our comments regarding your internal control environment and risk management processes, and outline any significant deficiencies noted through our audit procedures.

Accounting and internal controls

We highlight one current period control observation



We are required to provide a view, based on our audit procedures, on the effectiveness of your system of internal control relevant to risks that may affect financial reporting; and other risks arising from the entity's business model and the effectiveness of related internal controls.

Observation

The pensions team have implemented a risk register following a previous recommendation made by Deloitte. Our review of the register indicated that certain significant risk definitions (namely contributions and benefits) were not sufficiently robust as to anticipate the full range of potential risk areas.

Recommendation

We recommend that the pensions staff with oversight of these areas have a greater level of input into detailing all potential risks and appropriate responses.

Management response

Processes will be put in place to update the risk register in the current reporting period.

Accounting and internal controls

We highlight two updates from a prior period control observation



We are required to provide a view, based on our audit procedures, on the effectiveness of your system of internal control relevant to risks that may affect financial reporting; and other risks arising from the entity's business model and the effectiveness of related internal controls.

Observation 1 – controls around contributions

As observed in the prior year, we identified that there were insufficient review procedures in place for the checking of contribution schedules received from scheduled/admitted bodies. This could give rise to inaccuracies in the calculations underpinning the schedules.

Recommendation

It is recommended that a formal review process is implemented for authorisation of checks performed on scheduled/admitted contribution schedules provided by external employers. Evidence of authorisation should be clearly visible.

Management response

External contribution schedules are now formally checked and authorised before being inputted.

Observation 2 – Access to Custodian reports

As observed in the prior year, we identified that a regular arrangement was not in place to receive account statements from JP Morgan (Custodians of Record). Management made enquiries with JP Morgan regarding such a facility, who can offer JPM Access Views Portfolio Reporting. This will enable the balance held with JP Morgan to be monitored on a regular basis.

Recommendation

It is recommended that a process should be formalised. Access should be requested for JP Morgan Access Views Portfolio Reporting.

Management response

Monthly reports are now received from JP Morgan Access Views Portfolio Reporting and are agreed to ledger balances. These records are kept on file for reference.

Consideration of fraud

Consideration of fraud

Misstatements in the financial statements can arise from either fraud or error. The distinguishing factor between fraud and error is whether the underlying action that results in the misstatement of the financial statements is intentional or unintentional. Two types of intentional misstatements are relevant to us as auditors – misstatements resulting from fraudulent financial reporting and misstatements resulting from misappropriation of assets.

The primary responsibility for the prevention and detection of fraud rests with management and those charged with governance, including establishing and maintaining internal controls over the reliability of financial reporting, effectiveness and efficiency of operations and compliance with applicable laws and regulations. As auditors, we obtain reasonable, but not absolute, assurance that the financial statements as a whole are free from material misstatement, whether caused by fraud or error.

ISA (UK and Ireland) 240 – ‘The auditor’s responsibility to consider fraud in an audit of financial statements’ requires us to document an understanding of how those charged with governance exercise oversight of management’s processes for identifying and responding to the risks of fraud in the Fund and the internal control that management has established to mitigate these risks. It also requires us to presume there is a risk of fraud in respect of revenue recognition; however, considering the nature of the Fund and the revenue streams (mainly contributions and investment income) we have rebutted this risk.

We have made enquiries of management and others within the Fund as appropriate, regarding their knowledge of any actual, suspected or alleged fraud affecting the Fund. In addition, we are required to discuss the following with the Committee:

1. Whether the Committee have knowledge of any fraud, alleged or suspected fraud.
2. The role that the Committee exercise in oversight of the:
 - assessment of the risks of fraud; and
 - design and implementation of internal controls to prevent and detect fraud.
3. The Committees’ assessment of the risk that the financial statements may be materially misstated as a result of fraud.
4. Whether the Committee has disclosed to us all information in relation to any fraud, alleged or suspected fraud.

Representations from the Committee in this area are included in the draft letter of representation included in Appendix 1 of this report.

Management override of controls

In addition to the procedures above we are required to design and perform audit procedures to respond to the risk of management’s override of controls, which included:

- understanding and evaluating the financial reporting process and the controls over journal entries and other adjustments made in the preparation of the financial statements, we tested the appropriateness of a sample of such entries and adjustments.
- a review of accounting estimates for bias that could result in material misstatement due to fraud, including whether any differences between estimates best supported by evidence and those in the financial statements, even if individually reasonable, indicate a possible bias on the part of management. We also perform a retrospective review of management’s judgements and assumptions relating to significant estimates reflected in last year’s financial statements.
- obtaining an understanding of the business rationale of significant transactions that we become aware of that are outside the normal course of business or that otherwise appear to be unusual given our understanding of the Fund and its environment.

Responsibility Statement

Purpose of our report and responsibility statement

Our report is designed to help you meet your governance duties

What we report

Our report is designed to help the Governance, Audit, Risk Management and Standards Committee discharge their governance duties. It also represents one way in which we fulfil our obligations under ISA 260 to communicate with you regarding your oversight of the financial reporting process and your governance requirements. Our report includes:

- Any internal control observations; and
- Insights we may have identified from our audit.

What we don't report

As you will be aware, our audit was not designed to identify all matters that may be relevant to the Committee.

Also, there will be further information you need to discharge your governance responsibilities, such as matters reported on by management or by other specialist advisers.

Finally, our views on internal controls and business risk assessment should not be taken as comprehensive or as an opinion on effectiveness since they have been based solely on the audit procedures performed in the audit of the financial statements.

The scope of our work

- This report should be read alongside the supplementary "Briefing on audit matters" previously circulated to you and available on request.
- Our observations are developed in the context of our audit of the financial statements.
- We described the scope of our work in our audit plan in March 2015.

We welcome the opportunity to discuss our report with you and receive your feedback.



Deloitte LLP
Chartered Accountants

Cambridge
27 August 2015

This report has been prepared for the Governance, Audit, Risk Management and Standards Committee, as a body, and we therefore accept responsibility to you alone for its contents. We accept no duty, responsibility or liability to any other parties, since this report has not been prepared, and is not intended, for any other purpose. Except where required by law or regulation, it should not be made available to any other parties without our prior written consent.

Appendices

Appendix 1: Draft representation letter

Deloitte LLP
City House
126-130 Hills Road
Cambridge
CB2 1RY

Our Ref: PJS/RS/2015

Date:

Dear Sirs

London Borough of Harrow Pension Fund (the “Fund”)

This representation letter is provided in connection with your audit of the financial statements of the Fund for the year ended 31 March 2015 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view of the financial position of the Fund, in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2014/15, the financial transactions of the Pension Fund during the year ended 31 March 2015, and the amount and disposition of the Fund’s asset and liabilities as at 31 March 2015, other than liabilities to pay pensions and other benefits after the end of the Fund year.

We acknowledge as members of London Borough of Harrow Pension Fund our responsibilities for ensuring that the financial statements are prepared which give a true and fair view, for keeping records in respect of active members of the Fund and for making accurate representations to you.

We confirm, to the best of our knowledge and belief, the following representations.

1. All the accounting records have been made available to you for the purpose of your audit and all the transactions undertaken by the Fund have been properly reflected and recorded in the accounting records. All other records and related information, including minutes of Officer and Committee member meetings, have been made available to you.
2. We acknowledge our responsibilities for the design, implementation and operation of internal control to prevent and detect fraud and error.
3. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
4. We are not aware of any significant facts relating to any frauds or suspected frauds affecting the Fund involving:
 - (i). management;
 - (ii). employees who have significant roles in internal control; or
 - (iii). others where the fraud could have a material effect on the financial statements.
5. We have disclosed to you our knowledge of any allegations of fraud, or suspected fraud, affecting the Fund’s financial statements communicated by members, former members, employers, regulators or others.
6. We are not aware of any actual or possible instances of non-compliance with laws and regulations, the effects of which should be considered when preparing financial statements.

Appendix 1: Draft representation letter (continued)

7. Where required, the value at which assets and liabilities are recorded in the net asset statement is, in the opinion of the Authority, the fair value. We are responsible for the reasonableness of any significant assumptions underlying the valuation, including consideration of whether they appropriately reflect our intent and ability to carry out specific courses of action on behalf of the Fund. Any significant changes in those values since the balance sheet date have been disclosed to you.
8. We confirm the completeness of the information provided regarding the identification of related parties, and the adequacy of related party disclosures in the financial statements.

We have made enquiries of any key managers or other individuals who are in a position to influence, or who are accountable for the stewardship of the Fund and confirm that we have disclosed in the financial statements all transactions relevant to the Fund and we are not aware of any other such matters required to be disclosed in the financial statements, whether under the Code of Audit Practice on Local Authority Accounting in the United Kingdom in 2014/15: based on International Financial Reporting Standards or other regulations.

9. We confirm that the financial statements have been prepared on the going concern basis. We do not intend to wind up the Fund. We are not aware of any material uncertainties related to events or conditions that may cast significant doubt upon the Fund's ability to continue as a going concern. We confirm the completeness of the information provided regarding events and conditions relating to going concern at the date of approval of the financial statements, including our plans for future actions.
10. You have been informed of all changes to the Fund rules during the year and up to the current date.
11. We have not commissioned advisory reports which may affect the conduct of your work in relation to the Fund's financial statements.
12. No claims in connection with litigation have been or are expected to be received.
13. We have no plans or intentions that may materially affect the carrying value or classification of assets and liabilities reflected in the financial statements.
14. There have been no events subsequent to 31 March 2015 which require adjustment of or disclosure in the financial statements or notes thereto.
15. There have been no irregularities involving management or employees who have a significant role in the accounting and internal control systems or that could have a material effect on the financial statements.
16. The Pension Fund accounts and related notes are free from material misstatements, including omissions.
17. The Fund has complied with all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance. There has been no non-compliance with requirements of regulatory authorities that could have a material effect on the financial statements in the event of non-compliance.
18. The Fund has satisfactory title to all assets.
19. We have recorded or disclosed, as appropriate, all liabilities, both actual and contingent.

Appendix 1: Draft representation letter (continued)

20. No transactions have been made which are not in the interests of the members of the Fund during the Fund year or subsequently.
21. We confirm that:
- all retirement benefits and schemes, including UK, foreign, funded or unfunded, approved or unapproved, contractual or implicit have been identified and properly accounted for;
 - all settlements and curtailments have been identified and properly accounted for;
 - all events which relate to the determination of pension liabilities have been brought to the actuary's attention;
 - the actuarial assumptions underlying the valuation of the scheme liabilities (including the discount rate used) accord with the directors' best estimates of the future events that will affect the cost of retirement benefits and are consistent with our knowledge of the business;
 - the actuary's calculations have been based on complete and up to date member data as far as appropriate regarding the adopted methodology; and
 - the amounts included in the financial statements derived from the work of the actuary are appropriate.
22. All trades in complex financial instruments are in accordance with our risk management policies, have been conducted on an arm's length basis and have been appropriately recorded in the accounting records, including consideration of whether the complex financial instruments are held for hedging, asset/liability management or investment purposes. None of the terms of the trades have been amended by any side agreement and no documentation relating to complex financial instruments (including any embedded derivatives and written options) and other financial instruments has been withheld.
23. We confirm that the Pension Fund Annual Report is compliant with the requirements of Regulations 34(1)(e) of the Local Government Pension Scheme (Administration) Regulations 2008 and related guidance.
24. We confirm that the information that is contained within the Pension Fund Annual Report and Accounts for the year to 31 March 2015 is complete, accurate and consistent with the information that is contained within the Accounts.

We confirm that the above representations are made on the basis of adequate enquiries of other officials of the Fund (and where appropriate, inspection of evidence) sufficient to satisfy ourselves that we can properly make each of the above representations to you.

Yours faithfully

Signed on behalf of London Borough of Harrow Pension Fund

Appendix 2: Audit adjustments

There were no uncorrected misstatements identified.

Uncorrected misstatements

We report all individual identified uncorrected misstatements in excess of £337,000 (2013/14: £295,400) for the financial statements:

| | Credit/ (charge) to current year fund account £'000 | Increase/ (decrease) in net assets £'000 | Increase/ (decrease) in prior year net assets £'000 | Increase/ (decrease) in contributions £'000 |
|----------------------------------|---|---|---|---|
| Uncorrected misstatements | | | | |
| None noted | | | | |

Disclosure misstatements

Auditing standards require us to highlight significant disclosure misstatements to enable those charged with governance to evaluate the impact of those matters on the financial statements. There were no disclosure deficiencies identified to bring to the attention of the Committee.

Appendix 3: Fraud: responsibilities and representations

We summarise our respective responsibilities regarding fraud

Characteristics

- Misstatements in the financial statements can arise from either fraud or error. The distinguishing factor between fraud and error is whether the underlying action that results in the misstatement of the financial statements is intentional or unintentional.
- Two types of intentional misstatements are relevant as auditors – misstatements resulting from fraudulent financial reporting and misstatements resulting from misappropriation of assets.

Responsibilities

Your responsibilities

- The primary responsibility for the prevention and detection of fraud rests with management and those charged with governance, including establishing and maintaining internal controls over the reliability of financial reporting, effectiveness and efficiency of operations and compliance with applicable laws and regulations.

Our responsibilities

- We are required to obtain representations from your management regarding internal controls, assessment of risk and any known or suspected fraud or misstatement.
- As auditors, we obtain reasonable, but not absolute, assurance that the financial statements as a whole are free from material misstatement, whether caused by fraud or error.
- As set out in the significant risk section of this document we have identified the risk of fraud in management override of controls as a key audit risk for your organisation.

Appendix 4: Independence and fees

As part of our obligations under International Standards on Auditing (UK and Ireland) we are required to report to you on the matters listed below:

Independence confirmation

We confirm that we comply with APB Ethical Standards for Auditors and that, in our professional judgement, we are independent and our objectivity is not compromised.

Fees

Our fee for the audit of the 2015 accounts was £21,000 plus disbursements and VAT (2013/14: £21,000).

Non-audit services

In our opinion there are no inconsistencies between APB Revised Ethical Standards for Auditors and the Fund's policy for the supply of non-audit services or of any apparent breach of that policy. To confirm we have not performed any non-audit services in the year or previous year. We continue to review our independence and ensure that appropriate safeguards are in place including, but not limited to, the rotation of senior partners and professional staff and the involvement of additional partners and professional staff to carry out reviews of the work performed and to otherwise advise as necessary.

Relationships

We are required to provide written details of all relationships between us and the audited entity, its senior management and its affiliates, including all services provided by us and the DTTL network to the audited entity, its senior management and its affiliates that we consider may reasonably be thought to bear on our objectivity and independence and the related safeguards that have been put in place. We can confirm that we are not aware of any such relationships.

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REPORT FOR: Pension Board

Date of Meeting: 2 November 2015

Subject: Investment and Management Expenses
2014-15

Responsible Officer: Dawn Calvert, Director of Finance

Exempt: No

Wards Affected: All

Enclosures: Appendix 1 – Summary of Investment and
Management Expenses 2014-15

Section 1 – Summary and Recommendation

Summary

The report sets out the details of investment and management expenses incurred by the Pension Fund during 2014-15. The Board are invited to consider these and pass on any comments they wish to make to the Pension Fund Committee at their next meeting on 25 November 2015.

Recommendation

That the Board consider the details of investment and management expenses incurred by the Pension Fund during 2014-15 and agree any comments they wish to make to be passed onto the Pension Fund Committee at their next meeting on 25 November 2015.

Section 2 – Report

Background

1. Attached is a schedule of the investment and management expenses incurred by the Pension Fund in 2014-15. The expenses are split between those incurred directly by the Pension Fund and included in the accounts (£1.208m) and those advised by the fund managers as charged to the pooled funds which only appear in the Pension Fund's accounts within the change in market value of investments (£2.750m).

2. Total costs are £3.958m made up as follows:

| | £m |
|---|--------------|
| Direct Costs | |
| Management costs | 1.390 |
| Direct investment costs | 0.421 |
| Rebates | (0.603) |
| Sub Total | 1.208 |
| | |
| Investment costs charged within pooled funds | 2.750 |
| | |
| TOTAL | 3.958 |

3. This total is £0.347m higher than 2013-14 (£3.611m). Within the totals there are a number of variances, the most significant of which are:

| | £m |
|---|-------------|
| Management costs | |
| Reduction in costs of Hymans Robertson services arising from triennial valuation in previous year | (0.10) |
| Reduced requirements for reports from Aon Hewitt | (0.04) |
| Collective Investment Vehicle | 0.05 |
| Payroll and Central Recharges | 0.03 |
| Payroll software | 0.25 |
| | |
| Direct investment costs | |
| Additional performance fee on termination of Fidelity contract | 0.17 |
| | |
| Rebates | |
| Termination of Fidelity contract | 0.08 |
| | |
| Investment costs charged within pooled funds | |
| Termination of Wellington contract | (0.18) |
| Additional investment with Longview | 0.09 |
| New investment with GMO | 0.22 |
| New investment with Oldfields | 0.23 |
| Review of fees by Pantheon | (0.55) |
| Standard Life | 0.06 |
| | |
| Total | 0.31 |

4. The management costs (£1.390m) represent 0.21% (2013/14: 0.20%) of the Pension Fund value and the total investment and management expenses (£3.958) represent 0.59% (2013/14: 0.61%) of the Pension Fund value.
5. The Board are invited to consider the details of investment and management expenses incurred by the Pension Fund during 2014-15 and agree any comments they wish to make to be passed onto the Pension Fund Committee at their next meeting on 25 November 2015.

Financial Implications

6. All costs contained within the report and appendices and are met by the Pension Fund. They represent 0.59% of the net assets of the Pension Fund.

Risk Management Implications

7. Relevant risks are included within the Pension Fund Risk Register.

Equalities implications

8. There are no direct equalities implications arising from this report.

Council Priorities

9. Investment and management expenses have a direct impact on the financial health of the Pension Fund which directly affects the level of employer contribution which then, in turn, affects the resources available for the Council's priorities.

Section 3 - Statutory Officer Clearance

| | | |
|-----------------------|-------------------------------------|--|
| Name: Dawn Calvert | <input checked="" type="checkbox"/> | Chief Financial Officer |
| Date: 21 October 2015 | | |
| Name: Caroline Eccles | <input checked="" type="checkbox"/> | on behalf of the Monitoring Officer |
| Date: 16 October 2015 | | |

| | |
|-----------------------------------|-----------|
| Ward Councillors notified: | NO |
|-----------------------------------|-----------|

Section 4 - Contact Details

Contact: Ian Talbot, Treasury and Pension Fund Manager
0208 424 1450

Background Papers - None

| APPENDIX 1 | | | | |
|--|----------|--------------|--------------|------------|
| | 2014-15 | | 2013-14 | 2012-13 |
| | £'000 | £'000 | £'000 | £'000 |
| Direct Costs (Included within the Pension Fund Accounts) | | | | |
| Management costs | | | | |
| WM Performance Services | | 20 | 17 | 17 |
| JP Morgan Custody | | 1 | 18 | 9 |
| Hymans Robertson | | 68 | 163 | 99 |
| Aon Hewitt Investment Adviser | | 135 | 170 | 117 |
| Independent Investment Advisers x2 | | 20 | - | - |
| Deloitte Audit | | 19 | 21 | 21 |
| Collective Investment Vehicle (CIV) | | 50 | | |
| Payroll and central recharges | | 807 | 778 | 682 |
| Payroll software | | 254 | | |
| Other | | 15 | 23 | 20 |
| Sub total | | 1,390 | 1,190 | 965 |
| Direct investment costs | | | | |
| State Street | | | | |
| UK (First £100m @ 0.05%, thereafter @ 0.04%) | 45 | | | |
| All World (First £100m @ 0.07%, thereafter @ 0.06%) | 48 | | | |
| TOTAL | | 93 | 70 | 61 |
| (Average assets: UK £159m; Global £212m) | | | | |
| BlackRock | | | | |
| (First £100m @ 0.05%, thereafter @ 0.04%) | | 140 | 126 | 124 |
| (Average assets £80m) | | | | |
| Record | | | | |
| Fixed fee prior to 2014. From 2014-15 0.03% p.a of the mandate size. | | 21 | 20 | 20 |
| Fidelity | | | | |
| Additional performance fee | | 167 | - | - |
| Sub total | | 421 | 216 | 205 |
| Rebates | | | | |
| Fidelity rebate | - | 350 | - | 429 |
| Wellington rebate | - | 253 | - | 275 |
| Sub total | - | 603 | - | 704 |
| Total of Direct Costs | | 1,208 | 702 | 467 |

| | 2014-15 | | 2013-14 | 2012-13 |
|---|---------|--------------|--------------|--------------|
| | £'000 | £'000 | £'000 | £'000 |
| Investment costs charged within pooled funds | | | | |
| Fidelity | | | | |
| 0.25% Net Asset Value | 104 | | | |
| TOTAL | | 104 | 163 | 231 |
| (Average assets £71.3m) | | | | |
| Wellington | | | | |
| First £20m @ 0.65% | 82 | | | |
| Next £30m @ 0.50% | 97 | | | |
| Thereafter @ 0.45% | 197 | | | |
| TOTAL | | 376 | 557 | 495 |
| (Average assets £116.5m) | | | | |
| Longview | | | | |
| First £25m @ 0.75% | 188 | | | |
| Next £25m @ 0.65% | 163 | | | |
| Next £75m @ 0.60% | 52 | | | |
| TOTAL | | 403 | 316 | 257 |
| (Average assets £60.1m) | | | | |
| GMO | | | | |
| Between £32m and £80m 0.90% of Net Asset Value | | 224 | | |
| (Average Assets £72.5m) | | | | |
| Oldfield Partners | | | | |
| 0.90% Net Asset Value. With a 0.15% rebate monthly. | | | | |
| (Average assets £73.2m) | | 234 | | |
| Pantheon | | | | |
| 0.75% of committed capital | 299 | | | |
| Underlying managers average 2.25% management fee | 227 | | | |
| TOTAL | | 526 | 1,076 | 986 |
| Aviva | | | | |
| Fund of Funds fee of 0.214% | 92 | | | |
| Underlying managers assume 0.75% | 341 | | | |
| (Average assets £48.1m) | | 433 | 419 | 393 |
| Barings | | | | |
| 0.91% Net Asset Value | | 208 | 216 | - |
| (Average assets £27.3m) | | | | |
| Standard Life | | | | |
| 0.75% Net Asset Value | | 220 | 162 | - |
| (Average assets £29.1m) | | | | |
| Insight Investments | | | | |
| 0.40% p.a | | 22 | | |
| (Average assets £28.5m) | | | | |
| UBS | | | | |
| 0.75% of Net Asset Value plus 0.25%performance fee if in top quartile | | - | - | 3 |
| Units sold in 2012 | | | | |
| Total of investment costs charged within pooled funds | | 2,750 | 2,909 | 2,365 |
| TOTAL | | 3,958 | 3,611 | 2,832 |

REPORT FOR: Pension Board

Date of Meeting: 2 November 2015

Subject: Statement of Investment Principles

Responsible Officer: Dawn Calvert, Director of Finance

Exempt: No

Wards Affected: All

Enclosures: Statement of Investment Principles

Section 1 – Summary and Recommendation

Summary

This report sets out the Pension Fund's current Statement of Investment Principles and invites comment from the Board to assist the Pension Fund Committee when they consider the Statement at their meeting on 25 November 2015.

Recommendation

That the Board considers the current Statement of Investment Principles and agrees comments to assist the Pension Fund Committee when they consider the Statement at their meeting on 25 November 2015.

Section 2 – Report

Background

1. The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 state as follows:

Statement of investment principles

12.—(1) An administering authority must, after consultation with such persons as it considers appropriate, prepare, maintain (in accordance with paragraph (5)) and publish a written statement of the principles governing its decisions about the investment of fund money.

(2) The statement must cover its policy on—

- (a) the types of investment to be held;*
- (b) the balance between different types of investments;*
- (c) risk, including the ways in which risks are to be measured and managed;*
- (d) the expected return on investments;*
- (e) the realisation of investments;*
- (f) the extent (if at all) to which social, environmental or ethical considerations are taken into account in the selection, retention and realisation of investments;*
- (g) the exercise of the rights (including voting rights) attaching to investments, if the authority has any such policy; and*
- (h) stock lending.*

(3) The statement must also state the extent to which the administering authority complies with guidance given by the Secretary of State, and, to the extent the authority does not so comply, the reasons for not complying.

(4) The first such statement must be published no later than 1st July 2010.

(5) The statement must be reviewed, and if necessary, revised, by the administering authority from time to time and, in the case of any material change in the authority's policy on the matters referred to in paragraphs (2) and (3), before the end of a period of six months beginning with the date of that change.

(6) A statement revised under paragraph (5) must be published.

2. Attached is the current version of the Harrow Statement which was reviewed by the Pension Fund Committee on 23 September 2014 and 26 November 2014 and will be considered further at their meeting on 25 November 2015.
3. The Pension Fund Committee will review the whole document but, in particular, are expected to consider the statutory paragraph 10.1 which describes the policy on “social, environmental or ethical considerations.”
4. The Board are invited to consider the current Statement and, if they wish, agree comments to be passed onto the Pension Fund Committee.

Financial implications

5. There are no specific financial implications arising from this report

Risk Management implications

6. Whilst the Statement of Investment Principles deals with the way risks to the Pension Fund are measured and managed there are no specific risk management implications arising from this report

Equalities implications

7. There are no specific equalities implications arising from this report

Council Priorities

8. There is no direct impact on the Council Priorities.

Section 3 - Statutory Officer Clearance

| | | |
|-----------------------|-------------------------------------|-------------------------------------|
| Name: Dawn Calvert | <input checked="" type="checkbox"/> | Chief Financial Officer |
| Date: 21 October 2015 | | |
| Name: Caroline Eccles | <input checked="" type="checkbox"/> | on behalf of the Monitoring Officer |
| Date: 16 October 2015 | | |

Ward Councillors notified:

Not applicable

Section 4 - Contact Details

Contact: Ian Talbot, Treasury and Pension Fund Manager
0208 424 1450

Background Papers - None

***LONDON BOROUGH OF HARROW
PENSION FUND***

***STATEMENT OF
INVESTMENT PRINCIPLES***

CONTENTS

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Introduction

- 1.1 This is the Statement of Investment Principles (SIP) adopted by Harrow Council (the Council) in relation to the investment of assets of the Council's Pension Fund (the Fund). The Council is the Administering Authority of the Fund and, in that role it has responsibility to ensure the proper management of the Fund.
- 1.2 This SIP meets the requirements of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 ("The Regulations") and has been prepared after taking appropriate advice.
- 1.3 The Council, as Administering Authority, decides on the investment policies most suitable to meet the liabilities of the Pension Fund and has ultimate responsibility for investment strategy. These powers are exercised on its behalf by the Council's Pension Fund Committee. The Committee monitors investments, including manager performance, on a quarterly basis. Advice is received as required from the officers, the professional investment adviser and the independent advisers. In addition, the Committee requires managers periodically to attend its meetings. The Committee is responsible for monitoring compliance with guidance given by the Secretary of State for Communities and Local Government.
- 1.4 The Council has delegated the management of the Fund's investments to professional investment managers, appointed in accordance with the Local Government Pension Scheme (LGPS) regulations, whose activities are specified in either detailed investment management agreements or subscription agreements and regularly monitored. The Committee is satisfied that the appointed fund managers have sufficient expertise and experience to carry out their role
- 1.5 The Statement is subject to review from time to time and, certainly, within six months of any material change in investment policy or other matters as required by law.

Fund Objectives

- 2.1 The LGPS is established by statute. The Pension Fund is a legally distinct account with contributions made by employees (fixed percentage of earnings) and employers. The primary objective of the Fund is to optimise performance within risk parameters thereby minimising the level of employer contributions in order to meet the cost of pension benefits as required by statute.
- 2.2 A related objective is to minimise the volatility of employer contribution rates as investment returns vary from year to year.

Investment Objectives

- 3.1 The investment objective of the Fund is to achieve a return that is sufficient to meet the funding objectives as set out above, subject to an appropriate level of risk (implicit in the target) and liquidity. Over the long-term, it is expected that the Fund's investment returns will be at least in line with the assumptions underlying the actuarial valuation.

Investment style

- 4.1 It is the Council's current policy that external fund managers are employed to administer the Fund's assets. The current structure, as set out in the table below, was agreed in principle in November 2013 and is being implemented during 2014-15. The majority of the Fund is invested in "growth assets" i.e. those expected to generate 'excess' returns over the long term. These include equities, and private equity. The structure also includes a small allocation to "cash flow matching" assets, mainly corporate bonds. Additionally, the investments in property and diversified growth funds provide both diversification and expected returns in excess of liabilities.

The table below shows the asset allocation structure.

| ASSET CLASS | MANAGEMENT APPROACH | ALLOCATION | RANGE |
|--------------------------------|---------------------|------------|-------|
| | | % | % |
| Equities | | | |
| Global | Passive | 31.0 | |
| | Active | | |
| Global | Unconstrained | 20.7 | |
| | Active | | |
| Emerging Markets | Unconstrained | 10.3 | |
| TOTAL | | 62.0 | 58-68 |
| Bonds | | | |
| Corporate | Active | 10.4 | |
| Index-linked gilts | Active | 2.6 | |
| TOTAL | | 13.0 | 11-15 |
| Alternative Investments | | | |
| Diversified Growth Funds | Active | 10.0 | |
| TOTAL | | 10.0 | 8-12 |
| Property | Active | 10.0 | 8-12 |
| Private Equity | Active | 5.0 | 4-6 |
| TOTAL | | 100.0 | |

- 4.2 The above allocations, ranges and the management structure comply with the limits set out in The Regulations with the exception that the limit on single insurance contracts has been increased from 25% to the upper limit of 35% to permit investment, prior to the re-structure being completed in a passive UK equities portfolio. This decision will apply until the completion of the re-structure. The decision to increase the limit complies with The Regulations.

- 4.3 The investment style is to appoint fund managers with clear performance benchmarks and place maximum accountability for performance against that benchmark with them. Multiple fund managers are appointed to give diversification of investment style and spread of risk. The fund managers appointed are mainly remunerated through fees based on the value of assets under management. Private equity managers are remunerated through fees based on commitments and also performance related fees.
- 4.4 The investment strategy is reviewed periodically.
- 4.5 Cash balances are held in either or both of the two Pension Fund bank accounts, current and call account.
- 4.6 Actual asset allocations are monitored against the above structure and rebalanced as appropriate. The Section 151 officer has delegated authority to undertake a quarterly rebalancing of the equity and bond portfolios should they breach the above ranges. Any rebalancing activity authorised by the Section 151 officer will be reported to the next meeting of the Pension Fund Committee. Rebalancing within the bond portfolio is delegated to the fund manager.
- 4.7 Where appropriate, custodians are appointed to provide trade settlement and processing and related services. Where investments are held through funds, the fund appoints its own custodian.
- 4.8 Stock lending is permitted in pooled funds where applicable. Details of investment managers' procedures and controls are available on request.

Performance

- 5.1 Performance targets are set on a three-year rolling basis in relation to the benchmark. The investment managers' performance is reviewed at quarterly and annual intervals by the WM Performance Services who provide independent performance statistics and reports.
- 5.2 The Council also monitors the qualitative performance of the Fund managers to ensure that they remain suitable for the Fund. These qualitative aspects include changes in ownership, changes in personnel, and investment administration

Types of Investments

- 6.1 A management agreement is in place for each fund manager, setting out where relevant, the benchmark, performance target and asset allocation ranges. The agreements also set out any statutory or other restrictions determined by the Council. Investment may be made in accordance with The Regulations in equities, fixed interest and other bonds and property, in the UK and overseas markets. The Regulations specify other investment instruments that may be used, for example, financial futures, traded options, insurance contracts, stock lending, sub-underwriting contracts.

- 6.2 The Regulations also specify certain limitations on investments. Principally, these place a limit of 10% of the whole fund in any single holding, or deposits with a single bank or institution, or investments in unlisted securities. The Council does however have discretion to adopt a higher statutory limit in respect of specific investments subject to formal agreement by the Council.

Investment Risk

- 7.1 Whilst the objective of the Council is to maximise the return on its investments, it recognises that this has to be within certain risk parameters and that no investment is without an element of risk. The Council acknowledges that the predominantly equity based investment strategy may entail risk to contribution stability, particularly due to the short term volatility that equity investments can involve. The long term nature of the Fund and the expectation that longer term returns from equity investments will exceed those from bonds mean, however, that a high equity allocation remains an appropriate strategy for the Fund.
- 7.2 A policy of diversification for its investments and investment managers helps the Council to mitigate overall risk. Benchmarks and targets against which investment managers are expected to perform are further measures put in place to manage the risks for the Fund. Manager performance is monitored quarterly with investigation of any significant deviations from intended strategy.
- 7.3 With investment returns included, the Fund has a positive cash flow that enables investment in illiquid asset classes e.g. private equity and property. More than 70% of the fund is invested in equities and bonds that are highly liquid.
- 7.4 The Council has established a currency hedge covering 50% of the global equity portfolio to dampen the effect of foreign currency fluctuations against sterling.
- 7.5 Demographic factors including the uncertainty around longevity / mortality projections (e.g. longer life expectancies) contribute to funding risk. There are limited options currently available to fully mitigate or hedge this risk. The Council monitors liabilities using a specialist service provided by Club Vita, a “sister” company of the Fund’s Actuary, Hymans Robertson. Club Vita carries out a comprehensive analysis of the Fund’s longevity data to facilitate an understanding which helps to manage this issue in the most effective way.

The realisation of investments

- 8.1 A realisable (liquid) investment is one that can be readily converted into cash, for example to satisfy payments out of the Fund. The majority of the Fund’s assets are highly liquid and the Council is satisfied that the Fund has sufficient liquid assets to meet all expected and unexpected demands for cash. Assets in the Fund that are considered to be illiquid include property and private equity. As a long term investor the Council considers it prudent to include illiquid assets in its strategic asset allocation in order to benefit from the additional diversification and extra return this should provide.
- 8.2 The Council has delegated to the fund managers responsibility for the selection, retention and realisation of assets.

Investment advice

- 9.1 Professional advice on investment matters is taken from the investment practice of Aon Hewitt. Hymans Robertson provides actuarial services.

Social, environmental or ethical considerations

- 10.1 The extent to which social, environmental and ethical considerations are taken into account in investment decisions is left to the discretion of the fund managers. However, the Council expects that investment return is seen as the priority and that the extent to which these considerations may have a financial impact on the portfolio will be taken into account by the fund managers in the exercise of their delegated duties. However, the Council expects the fund managers to engage positively and seek to influence companies in which the Fund invests to take account of key social, environmental and ethical considerations.

Exercise of the rights (including voting rights) attaching to investments

- 11.1 The Council is an active shareholder and will exercise its rights (including voting rights) to promote and support good corporate governance principles which in turn will feed through into good investment performance.
- 11.2 In practice, the Fund's equity holdings are wholly invested through pooled funds in which voting and engagement decisions are made by fund managers. The Council encourages its fund managers to vote and engage with investee companies worldwide to ensure they comply with best practice in corporate governance in each locality. The fund managers provide reports on their voting and engagement activities.

Additional Voluntary Contributions (AVC)

- 12.1 In line with statute, the Council has to appoint AVC providers and the current providers are Clerical Medical Equitable Life and Prudential.

Compliance with "Myners" Principles

- 13.1 In Appendix 1 are set out the details of the extent to which the Fund complies with the six updated "Myners" principles set out in the Chartered Institute of Public Finance and Accountancy's publication "Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012." These principles codify best practice in investment decision making

Compliance with “Myners” Principles”

1. Effective decision-making

Administering authorities should ensure that:

- decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to take them effectively and monitor their implementation.
- those persons or organisations should have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest.

Fund compliance – Full

- The Council has delegated decision making in respect of the Pension Fund to the Pension Fund Committee, comprising four Councillors with full voting rights with representatives from the trade unions invited.
- The Committee, with advice from its Investment Adviser and independent advisers has appropriate skills for, and is run in a way that facilitates, effective decision making.
- Members of the Committee are provided with training opportunities in line with the skills and knowledge framework produced by CIPFA and a training log is maintained.
- There are sufficient internal resources and access to external resources for the Pension Fund Committee to make effective decisions.

2 Clear objectives

An overall investment objective(s) should be set out for the Fund that takes account of the scheme’s 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. These should be clearly communicated to advisers and investment managers.

Fund compliance - Full

- The Fund’s Statement of Investment Principles and Funding Strategy Statement set out its investment objectives which are agreed after consultation with the Fund actuary and take into account the Fund’s liabilities, the impact on employer contribution rates, future cashflows and the Fund’s attitude to risk.
- Asset allocation, benchmarks and risk parameters are set with the aim of achieving these objectives.
- Fund managers have clear written mandates with individual performance targets and benchmarks and their performance is measured and reviewed by the Committee on a quarterly basis.
- Full account is taken of the strength of the sponsor covenant for all non-local authority employers admitted to the fund and contribution rates set accordingly.

3 Risks and Liabilities

In setting and reviewing their investment strategy, administering 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.

Fund compliance – Full

- The Committee, in setting its investment strategy, has taken account of the form and structure of its liabilities following advice from the Fund's actuary. The strategy aims to achieve the return required to meet its liabilities whilst taking into account stability of contributions and affordability for employers.
- Consideration is given to the payment of a bond by prospective admitted bodies to the Fund to minimise the financial consequences of default.
- A risk assessment and suggestions as to how the risks can be managed is included in the triennial valuation.
- Longevity risk is built into the triennial actuarial and is therefore included when determining the investment strategy
- Investment risk, including that of underperformance is taken into account in the Statement of Investment Principles and the Fund's Annual Report.

4 Performance Assessment

Arrangements should be in place for the formal measurement of the performance of investments, investment managers and advisers. Administering authorities should also periodically make a formal policy assessment of their own effectiveness as a decision-making body and report on this to scheme members.

Fund compliance – Partial

- In addition to overall Fund performance, the Committee considers the performance of individual investment managers against their benchmarks on a quarterly basis; matters of poor performance are addressed through meetings with fund managers and, if necessary, the termination of contracts.
- An independent performance measurement company provides quarterly and annual reports detailing the performance of the Fund and its managers and identifying the achievements resulting from asset allocation and manager performance.
- The Committee also receives, annually, data measuring its performance against that of other administering authorities but in reviewing this is conscious of the need to set its own investment strategy based on its own Fund liabilities and other local conditions.
- The performance of actuaries and advisers is informally assessed on an ongoing basis.
- The performance of the Fund is reported annually to all scheme members and is included in the Annual report; the Committee will be considering ways of improving their accountability, particularly in the context of the imminent establishment of the local pension board.

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 members on the discharge of such responsibilities.

Fund compliance – Partial

- The Fund’s policy on the extent to which its investment managers take account of social, environmental and ethical considerations is stated in the Statement of Investment Principles.
- The Fund expects its managers to engage positively and seek to influence companies in which the Fund invests to take account of key social, environmental and ethical considerations.
- Where applicable, the Fund expects its managers to have adopted the Institutional Shareholders’ Committee Statement of Principles on the responsibilities of shareholders and agents.
- Whilst the Fund’s equity holdings are wholly invested through pooled funds in which voting and engagement decisions are made by fund managers the Council encourages its managers to vote and engage with investee companies worldwide to ensure they comply with best practice in corporate governance in each locality. The fund managers provide reports on their voting and engagement activities.

6 Transparency and Reporting

Administering authorities should:

- Act in a transparent manner, communicating with stakeholders on issues relating to their management of investment, its governance and risks, including performance against stated objectives.
- Provide regular communication to members in the form they consider most appropriate.

Fund compliance – Full

- The Fund publishes a Communications Policy Statement detailing its policy and detailed strategy for communicating information to members, prospective members and their employers, union representatives, elected Members, tax payers and other interested parties. The Fund makes available a range of documents including:
 - Annual Report including Statement of Accounts.
 - Governance Compliance Statement which includes level of compliance.
 - Communications Policy Statement.
 - Statement of Investment Principles.
 - Funding Strategy Statement.
 - Triennial Actuarial Valuation.
 - Agenda and Minutes of Pension Fund Committee.
 - Annual Statement of Benefits to all active and deferred members.
 - Newsletter to pensioners once a year.
 - Newsletters to active members at least once a year.
- The Communications Policy Statement details the methods of communication available for each “target” group which include:
 - The Council’s website
 - Hard copy
 - Annual employers meeting
 - Quarterly employers focus groups
 - DVD

REPORT FOR: Pension Board

Date of Meeting: 2 November 2015

Subject: Pension Fund Committee Meeting 1 July 2015

Responsible Officer: Dawn Calvert, Director of Finance

Exempt: No

Wards Affected: All

Enclosures: Presentation by State Street Global Services

Section 1 – Summary and Recommendation

Summary

The report sets out the matters considered by the Pension Fund Committee at their meeting on 1 July 2015 and invites the Board to agree any comments they might wish to make to the Committee.

Recommendation

The Board are invited to consider this report and agree comments to be passed on to the Pension Fund Committee.

Section 2 – Report

1. Matters considered by the Pension Fund Committee at their meeting on 1 July 2015 were as follows:
2. London Borough of Harrow Pension Fund Performance Review

Attached is a copy of the annual presentation from State Street Global Services on the investment performance of the Fund for the period ending 31 March 2015.

The Committee's discussion was minuted as follows:

The Committee received a presentation from State Street Global Services (WM Performance Services) on the performance of the Fund for period ending 31 March 2015.

Karen Thrumble, representing State Street Global Services (WM Performance Services), circulated a presentation titled 'Performance Review – Periods to End March 2015' and explained that the performance of the fund was measured on an aggregate basis and that a Local Authority Universe had been created to provide an overview of the Council's Pension Fund and how it was performing. She reported on:

- *2014/15 returns and explained how the investments in equities and bonds had performed, including the returns on short and long term bonds and the performance of sterling against the US dollar which had weakened and that hedging would have been costly in this instance;*
- *long term performance over a period of 3, 5, 10 and 20 years where the annual returns had been strong and ahead of the actuary forecasts. Equities had performed ahead of the Bonds. Cash held had provided a marginal return, whilst investments in Alternatives had performed better. Investments in Property had been good and the return on total assets had been exceptional;*
- *there had been a reduction in investment in Equities over the years whilst investment in Bonds had remained the same with Alternatives being the preferred option due to the lower risks associated with such investment;*
- *Fund Structure and Benchmark 2014/15 – had been a year of significant change with the restructure of the Equity portfolios and replacement of Barings DG with Insight. Whilst such changes would have normally shown a difficult performance, this had not happened. The excellent performance in 2015 had brought the medium term results above benchmark;*
- *Longer Term Manager Performance – performance had been in line with or above benchmark;*

• *Performance Relative to Other Funds – in the last year, both Equity and Bond selection had added value. The Fund had benefited from having a low UK Equity weighting and from having longer duration Bonds than its peers. The Fund had comfortably outperformed the peer group over the short and medium term. The Harrow Pension Fund had performed 1.8% ahead of other LA Funds. In the last five years, the Fund had been more volatile than its peers but had been rewarded with a performance that was ahead of the average. In summary: (a) in this year of change, the Fund had achieved strong results both in absolute and relative terms (b) Equity performance had been strong with Longview in particular continuing to add significant value (c) relative to other funds, performance was good. The Fund had benefitted from having a low commitment to the UK Equity market and from having relatively long duration Bond portfolio. Currency hedging had had a negative effect over the year.*

During the presentation, an Independent Adviser asked questions on the actual net value of the Fund, and highlighted the importance of understanding costs. He suggested that annual accounts, including management fees, be presented at the next meeting. Karen Thrumble reported that performance management was net of fees levied. The Chair stated that providing value for money was a valid argument but that, in relation to the LA Pension Fund, cost was also an issue.

An Independent Adviser was of the view that the hedging of 50% of Equities had, historically, dampened performance and suggested that Members may wish to examine this aspect.

RESOLVED: That the presentation be received.

3. Establishment of Pension Fund Risk Register

The Committee received an updated version of the Risk Register which they had considered at their previous meeting.

In light of the Auditor's recommendation in their Report on the 2014-15 Accounts the Committee will be considering the matter further at their next meeting on 25 November.

At their first meeting the Board were given a copy of the, then, Register and will be invited to consider it further at a later meeting.

4. Work Programme for 2015-16

The Committee agreed their work programme for the remainder of 2015-16 and, in particular:

The Chair referred to the need to work through the sequencing of trainings / presentations / review of policy / options for action around Responsible Investing

5. Information (Verbal) Report – Pension Board

The Committee's discussion was minuted as follows:

An officer circulated a synopsis of the meeting of the Pension Board held on 25 June 2015, as outlined at appendix A to these minutes [not attached].

The Chairman 'welcomed' the Board, including its functions, and reported that he would make contact with his counterpart at the Board. A discussion ensued on the remit of the Board, the sharing of confidential papers between the two bodies and attendance of Board members at meetings of the private sessions of the Pension Fund Committee.

In response to questions, an officer outlined the remit of the Board which was broadly to assist in the administration of the Pension Fund. A representative of Aon Hewitt, Council's Adviser, added that the role of the Board was to examine the decision making role of the Pension Fund Committee and that the Board provided a scrutinising role.

RESOLVED: That

(1) the Committee extends its 'welcome' to the Board and its scrutinising role of the Pension Fund Committee on how investment decisions were made;

(2) it be noted that the public sessions of the meetings of the Pension Fund Committee were open to all to attend;

(3) subject to the outcome of resolution (4) below, an invitation to attend private sessions of meetings of the Pension Fund Committee on an adhoc basis be extended to members of the Board;

(4) it be noted that a legal view would be sought in relation to the sharing of confidential papers/agendas between the two bodies.

6. Information Report – Presentation by Aviva Investors

The Committee received a presentation from representatives of Aviva Investors in respect of the property mandate they manage on the Fund's behalf.

7. Information Report – Presentation by Pantheon Ventures

The Committee received a presentation from representatives of Pantheon Ventures in respect of the private equity mandate they manage on the Fund's behalf.

Concerns were raised in respect of the performance of one of the sub-funds and the level of fees. Officers were instructed to investigate these matters further and to report back to the Committee.

8. Review of Bond Allocation

The Committee's discussion was minuted as follows:

The Committee received confidential reports of the Interim Director of Finance and Aon Hewitt, the Council's Adviser, in order to allow the Committee to reach a decision on the future of the Fund's Bond portfolio following a request by BlackRock Investment Management to adjust their mandate for bonds and index linked gilts.

The Committee discussed the alternatives available in relation to Absolute return Bond Strategies (ABS) and Liability Driven Investments (LDIs) and were mindful of the need to take a balanced and informed decision, including the need to explore tangible options for further protection. As a result, it was

RESOLVED: That

(1) tangible options to refine the Bond Portfolio to increase interest rate / inflation protection, including with the use of LDIs, be developed for discussion and decision at the next Committee meeting;

(2) detailed explanation of the implications of each option be provided by Aon Hewitt, Council's Adviser.

9. Review of Investment Adviser Contract

The Committee's discussion was minuted as follows:

The Committee received a confidential report of the Interim Director of Finance, which set out the background to the appointment of the Fund's Investment Adviser, Aon Hewitt Ltd, with a recommendation that their contract be extended for a further two years to 1 November 2017.

The Committee discussed the proposal, including the historical relationship with the company and expressed some concerns about the imminent departure of the company's key adviser to the Committee and the impact this might have on any future working relationship. In this regard, it was noted that the Chair of the Committee and the Interim Director of Finance would meet with the company to discuss and it was

RESOLVED: That

(1) in accordance with the current Agreement, the contract with Aon Hewitt Ltd, the Fund's Investment Adviser be extended for a further two years until 1 November 2017 and authority be delegated to the Section 151 officer to sign any documentation necessary to formalise the extension;

(2) responsibility be delegated to the Chair, Vice-Chair and the Interim Director of Finance to ensure that the successor to the current adviser met the requirements of the Committee

Subsequent to the meeting it was agreed with Aon Hewitt that Mr Colin Cartwright would become the Committee's lead adviser.

10. Information Report - Annual Review of Internal Controls at Fund Managers

Once a year the Committee are advised of the findings of each manager's independent audit of its internal control functions. Officers analyse these findings and advise the Committee of any adverse comments.

If considered serious enough matters are raised with the managers.

Of the three manager's reviewed at this meeting there no matters considered worthy of raising directly with them.

11. Information Report – Investment Manager Monitoring

At each meeting of the Committee they receive a report from their Investment Adviser AonHewitt on each of the fund managers, evaluating their performance and rating them according to:

- Business
- Staff
- Process
- Risk
- Operational Due Diligence
- Performance Analysis
- Terms and Conditions

For each manager they provide an overall rating as follows:

- Buy – clients invest with or maintain their existing allocation to these products
- Buy (Closed) - clients invest with or maintain their existing allocation to these products which are closed to new investors
- Qualified – a number of criteria have been met and investment managers are considered to be qualified to manage client assets
- Sell – termination of investments is recommended
- In Review – rating is under review as factors are evaluated which may cause a change to the current rating

All of the Harrow fund managers have been given either a "Buy" or "Qualified" rating.

12. Information Report – Performance of Fund Managers for Quarter Ended 31 March 2015 and Valuation at 31 May 2015

At each meeting the Committee consider the most recent performance and valuation available to them.

13. The Board are invited to consider this report and agree comments to be passed on to the Pension Fund Committee.

Financial Implications

14. Whilst this report discusses numerous matters relevant to the financial standing of the Pension Fund there are no financial implications arising directly from it.

Risk Management Implications

15. Apart from the risks raised by the Auditor in their report all risks are included within the Pension Fund Risk Register.

Equalities implications

16. There are no direct equalities implications arising from this report.

Council Priorities

17. The financial health of the Pension Fund directly affects the level of employer contribution which in turn affects the resources available for the Council's priorities

Section 3 - Statutory Officer Clearance

| | | |
|-----------------------|-------------------------------------|-------------------------------------|
| Name: Dawn Calvert | <input checked="" type="checkbox"/> | Chief Financial Officer |
| Date: 21 October 2015 | | |
| Name: Caroline Eccles | <input checked="" type="checkbox"/> | on behalf of the Monitoring Officer |
| Date: 16 October 2015 | | |

| | |
|-----------------------------------|-----------------------|
| Ward Councillors notified: | Not applicable |
|-----------------------------------|-----------------------|

Section 4 - Contact Details

Contact: Ian Talbot, Treasury and Pension Fund Manager
0208 424 1450

Background Papers - None

London Borough of Harrow

Performance Review
Periods to End March 2015

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Karen Thrumble
July 1st 2015

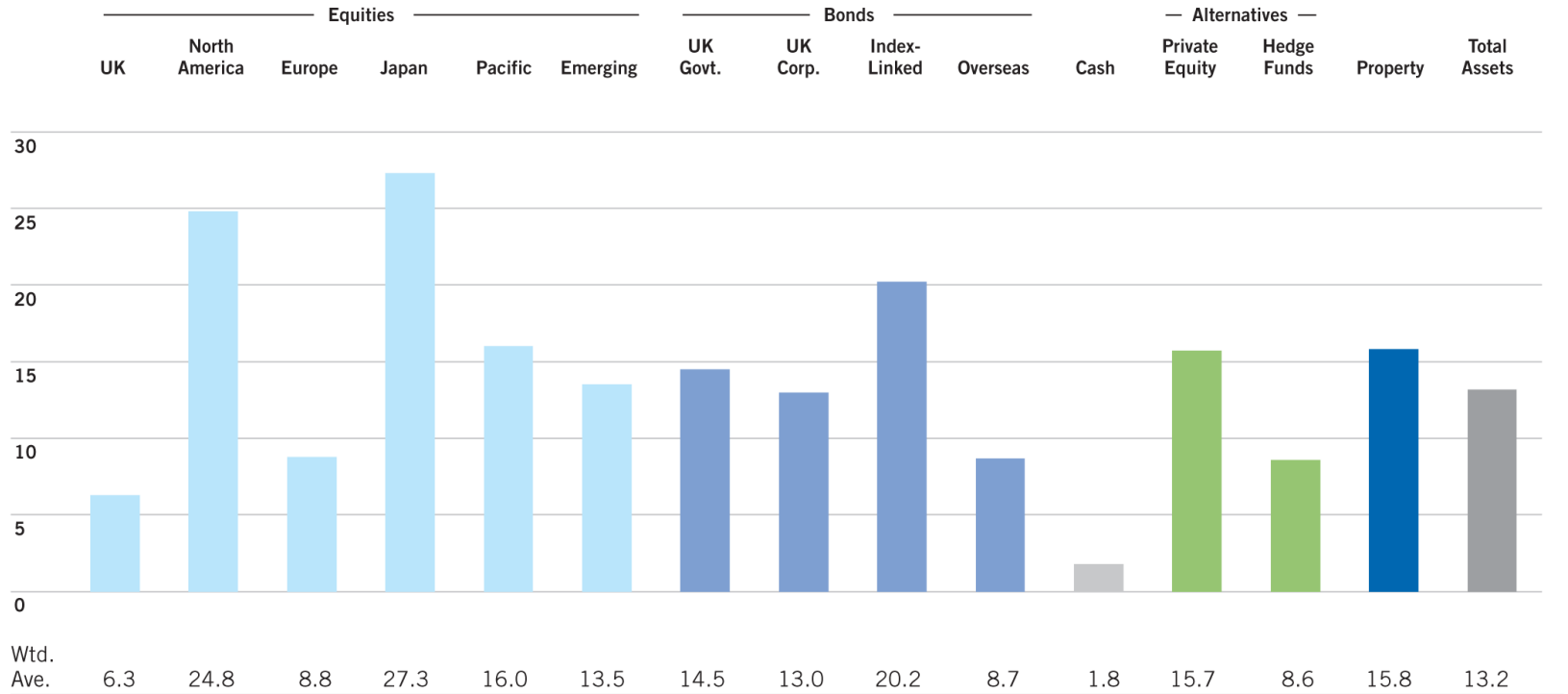
240

Market Background



2014/2015 Returns (%)

241



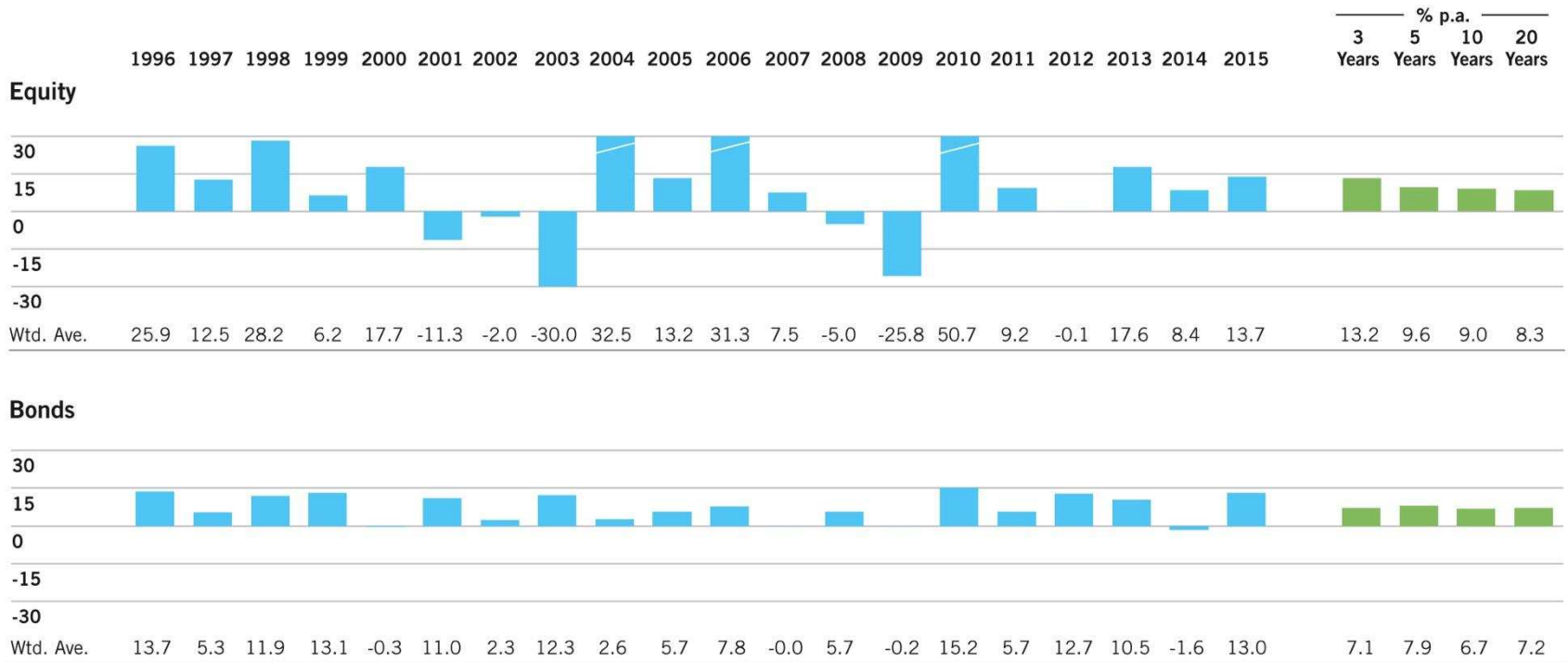
Source: State Street Global Services Performance Services, 2015.

Past performance is not a reliable indicator of future results.

Long Term Performance

Annual Returns (%)

242



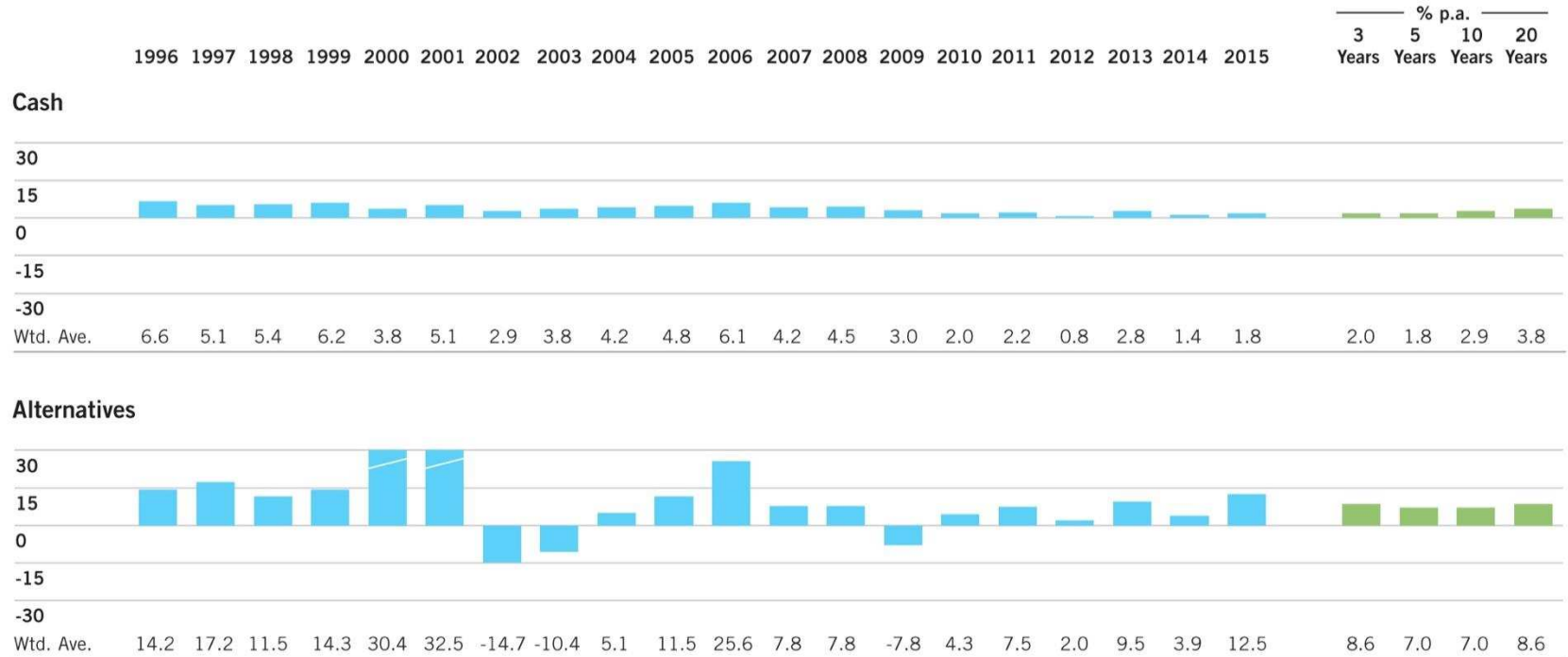
* Source: State Street Global Services Performance Services, 2015.

Past performance is not a reliable indicator of future results.

Long Term Performance

Annual Returns (%)

243



* Source: State Street Global Services Performance Services, 2015.

Past performance is not a reliable indicator of future results.

Long Term Performance

Annual Returns (%)

244

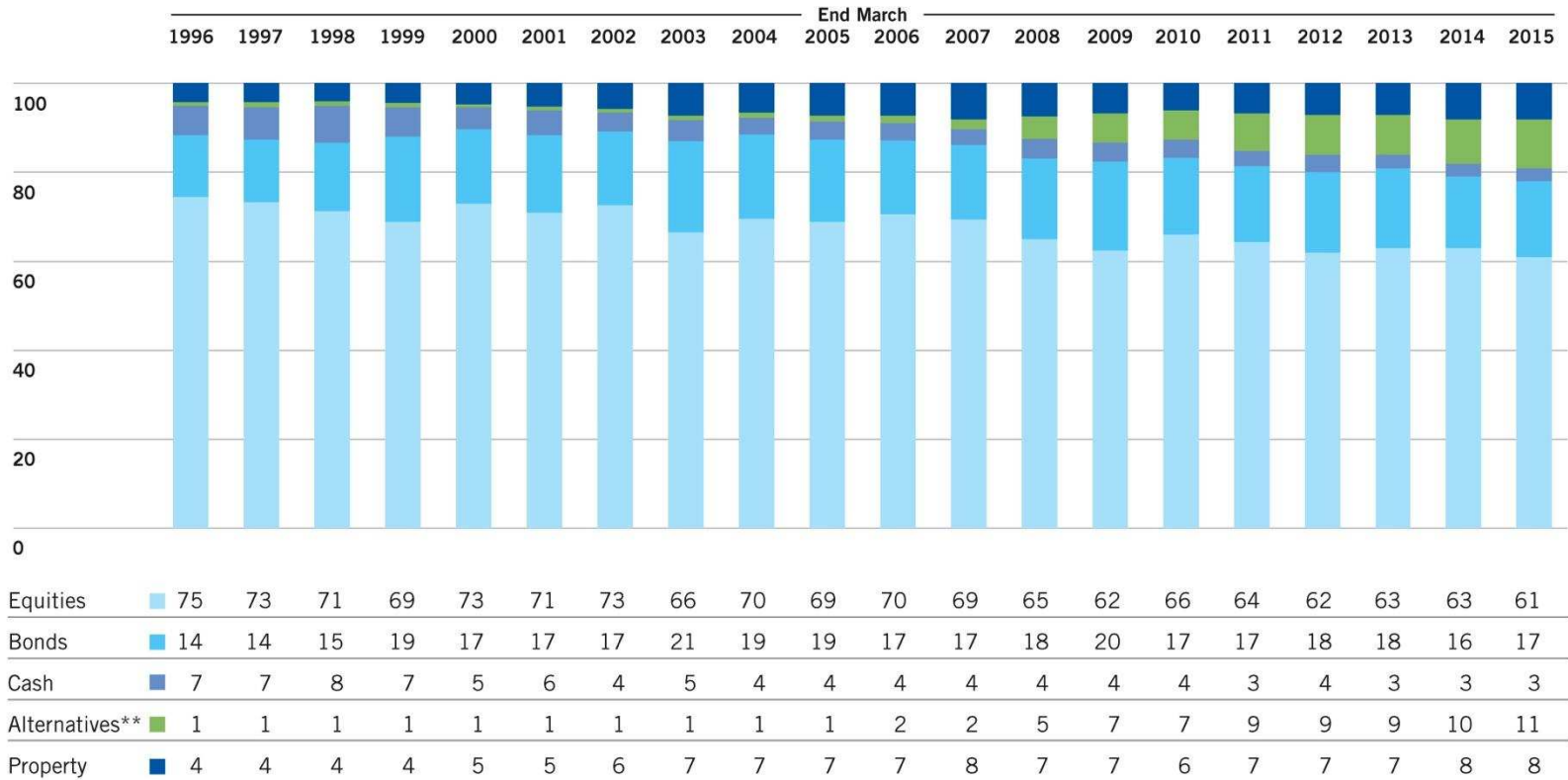


* Source: State Street Global Services Performance Services, 2015.

Past performance is not a reliable indicator of future results.

Longer Term Asset Allocation (%)

245



** Includes Pooled Multi-Asset from March 2010.

* Source: State Street Global Services Performance Services, 2015.

Past performance is not a reliable indicator of future results.

Fund Performance

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Fund Structure and Benchmark

| Values (GBP)'00 Mandate | | Value at 31/03/2014 | % Fund | Value at 31/03/2015 | % Fund |
|-------------------------|---------------------|------------------------|-----------|------------------------|-----------|
| SSGA | Eq Gbl | | | 220,705 | 33 |
| OLDFIELD | Eq Gbl | | | 77,276 | 11 |
| GMO GLOBAL | Eq Emer Mkt | | | 76,541 | 11 |
| SSGA | Eq UK | 155,513 | 26 | | 0 |
| FIDELITY | Eq Gbl | 68,638 | 12 | | 0 |
| WELLINGTON | Eq Gbl | 113,911 | 19 | | 0 |
| LONGVIEW | Eq Gbl | 49,507 | 8 | 75,561 | 11 |
| BLACKROCK | Fixed Int | 72,598 | 12 | 87,111 | 13 |
| AVIVA | Prop UK | 45,051 | 8 | 50,562 | 7 |
| ST LIFE | Diversified Grow th | 27,890 | 5 | 30,679 | 5 |
| INSIGHT | Diversified Grow th | | | 28,857 | 4 |
| BARING | Diversified Grow th | 26,630 | 5 | 0 | 0 |
| PANTHEON | Private Eq | 25,119 | 4 | 22,955 | 3 |
| INT FUND | Cash | 1,661 | 0 | 6,633 | 1 |
| BLACKROCK | Cash | 40 | 0 | 43 | 0 |
| RECORD | Curr Overlay | 1,113 | 0 | -2,649 | 0 |
| TRANSITION | Trans | | | | |
| Total Fund | | 587,669 | 100 | 674,272 | 100 |

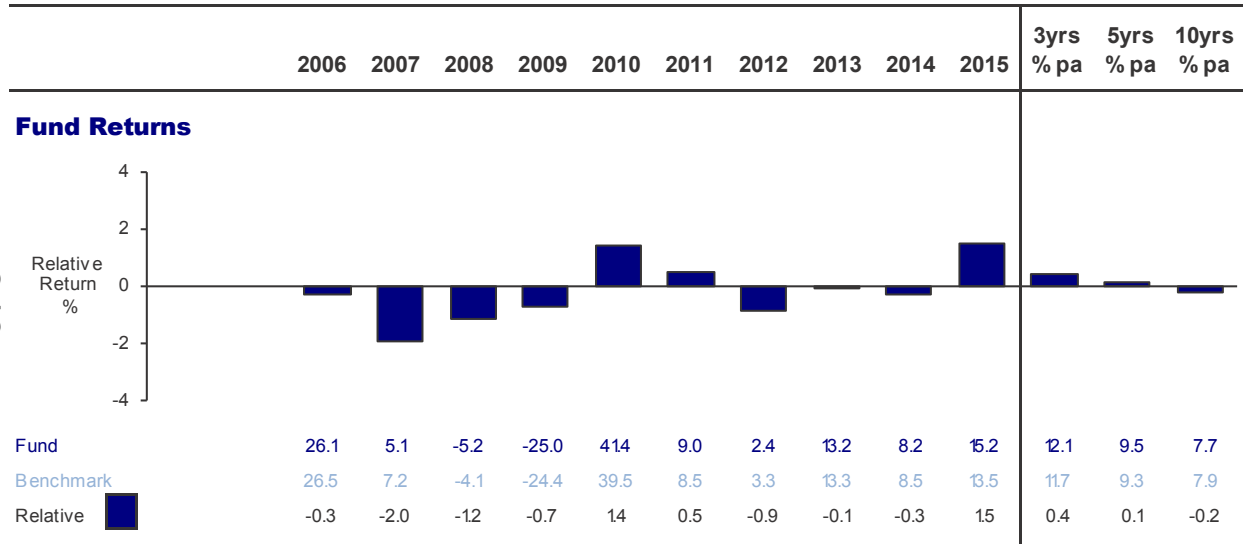
| | % | |
|-----------------------|------|--|
| Global Passive Equity | 31.0 | MSCI All World 50% Hedged |
| Global Active Equity | 21.0 | MSCI World NDR 50% Hedged |
| Emerging Markets | 10.0 | MSCI Emerging Markets |
| Bonds | 13.0 | 80% BAML Eurosterling >10 Years 20% FTSE Index Linked Gilts > 5 Years |
| Property | 10.0 | IPD UK PPF All Balanced Funds |
| Pooled Multi Asset | 10.0 | 3 Month LIBOR +4% |
| Private Equity | 5.0 | FTSE All World Index |

A year of significant change with the restructure of the equity portfolios and replacement of Barings DG with Insight.

Performance Overview

Latest year's excellent performance has brought the medium term results above benchmark.

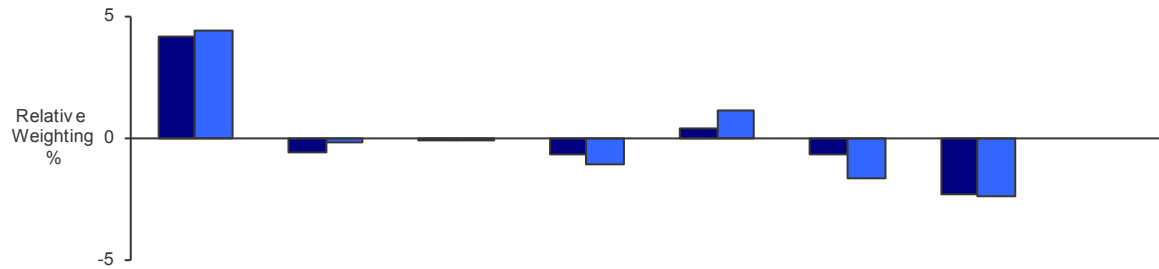
248



Latest Year Performance

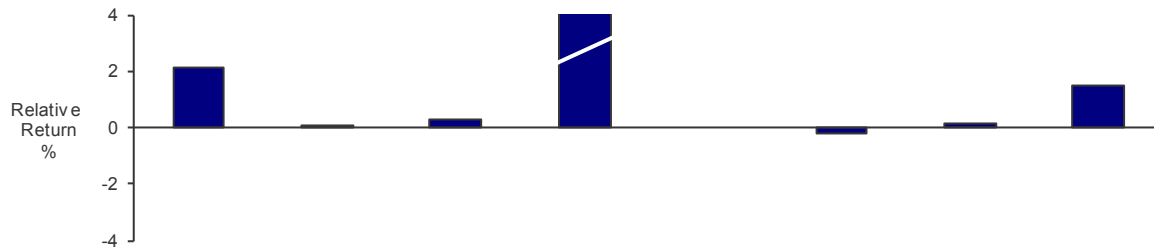
Equity UK Bonds UK IL Multi Asset Cash Private Eq Property Total Fund

Asset Allocation



| | | | | | | | | |
|------------|------|------|-----|------|------|------|------|-------|
| Fund Start | 66.1 | 9.8 | 2.5 | 9.3 | 0.4 | 4.3 | 7.7 | 100.0 |
| Fund End | 66.4 | 10.3 | 2.5 | 8.8 | 1.1 | 3.4 | 7.5 | 100.0 |
| BM Start | 62.0 | 10.4 | 2.6 | 10.0 | | 5.0 | 10.0 | 100.0 |
| BM End | 62.0 | 10.5 | 2.7 | 9.9 | | 5.1 | 10.0 | 100.0 |
| Impact | - | -0.1 | - | 0.1 | -0.1 | -0.1 | -0.1 | -0.3 |

Stock Selection



| | | | | | | | | |
|-----------|------|------|------|-----|-----|------|------|------|
| Fund | 14.9 | 19.7 | 21.4 | 9.2 | 0.0 | 18.9 | 16.8 | 15.2 |
| Benchmark | 12.6 | 19.6 | 21.0 | 4.6 | | 19.2 | 16.6 | 13.5 |
| Impact | 1.4 | - | - | 0.4 | | - | - | 1.8 |

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Equity selection was well above index, driving the latest year results.

Longer Term Manager Performance

250

| | 12 Months | 3 Years | 5 Years | 10 Years | Since Inception | Incept. Date |
|------------------------------|-----------|---------|---------|----------|-----------------|--------------|
| LONGVIEW | 19.5 | 20.3 | 14.9 | | 16.1 | 20/11/2009 |
| LB OF HARROW - LONGVIEW B/M | 14.0 | 15.6 | 11.3 | | 12.1 | |
| | 4.8 | 4.1 | 3.2 | | 3.6 | |
| BLACKROCK | 19.8 | 11.0 | 10.7 | 8.3 | 7.9 | 31/7/2003 |
| LB OF HARROW BLACKROCK F/B/M | 19.9 | 11.0 | 10.6 | 8.5 | 8.0 | |
| | -0.1 | 0.0 | 0.1 | -0.2 | -0.2 | |
| PANTHEON VENTURES | 18.9 | 13.6 | 10.0 | | 6.3 | 30/4/2007 |
| LB HARROW PANTHEON B/M | 19.2 | 6.3 | 3.9 | | 3.6 | |
| | -0.2 | 6.9 | 5.8 | | 2.6 | |
| AVIVA COMBINED FUND | 16.8 | 10.3 | 10.3 | 4.9 | 6.7 | 29/12/2000 |
| AREF/IPD ALL BALANCED | 16.6 | 9.4 | 8.4 | 4.3 | 6.1 | |
| | 0.2 | 0.9 | 1.7 | 0.6 | 0.6 | |
| STANDARD LIFE | 10.0 | | | | 7.4 | 18/6/2013 |
| GBP 3 MONTH LIBOR +4% | 4.6 | | | | 4.5 | |
| | 5.2 | | | | 2.8 | |

Performance has been in line with or above benchmark over the medium term.

Performance Relative To Other Funds

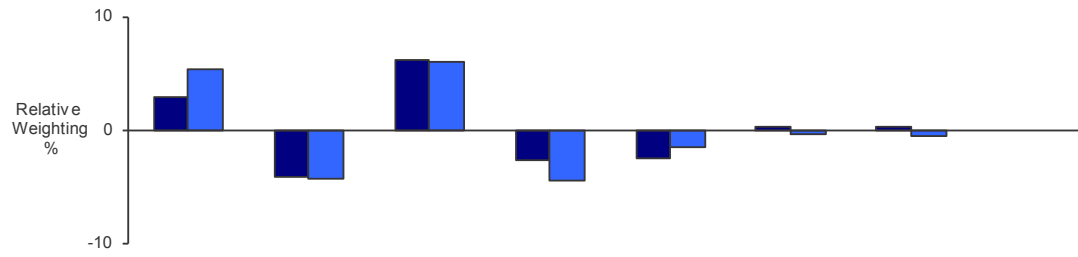
251

Latest Year Performance Relative to Other Funds

252

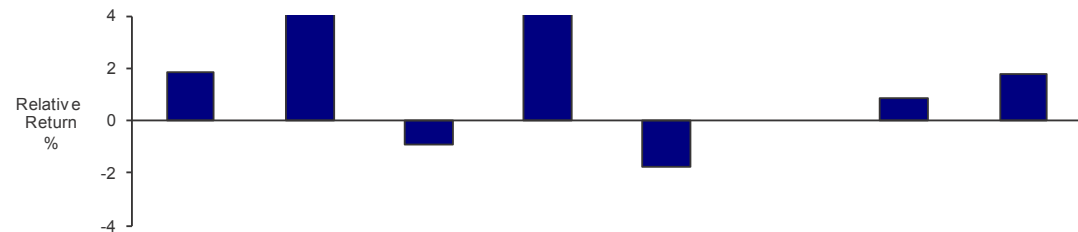
Equity Bonds Multi Asset Alternatives Cash Curr Instr Property Total Fund

Asset Allocation



| | | | | | | | | |
|------------|------|------|------|-----|-----|------|-----|-------|
| Fund Start | 66.0 | 12.3 | 9.3 | 4.3 | 0.4 | 0.2 | 7.7 | 100.0 |
| Fund End | 66.8 | 12.8 | 8.8 | 3.4 | 1.1 | -0.4 | 7.5 | 100.0 |
| BM Start | 63.1 | 16.4 | 3.1 | 7.0 | 2.9 | 0.0 | 7.4 | 100.0 |
| BM End | 61.5 | 17.1 | 2.8 | 7.9 | 2.7 | -0.0 | 8.1 | 100.0 |
| Impact | - | - | -0.2 | - | 0.2 | -0.5 | - | -0.4 |

Stock Selection



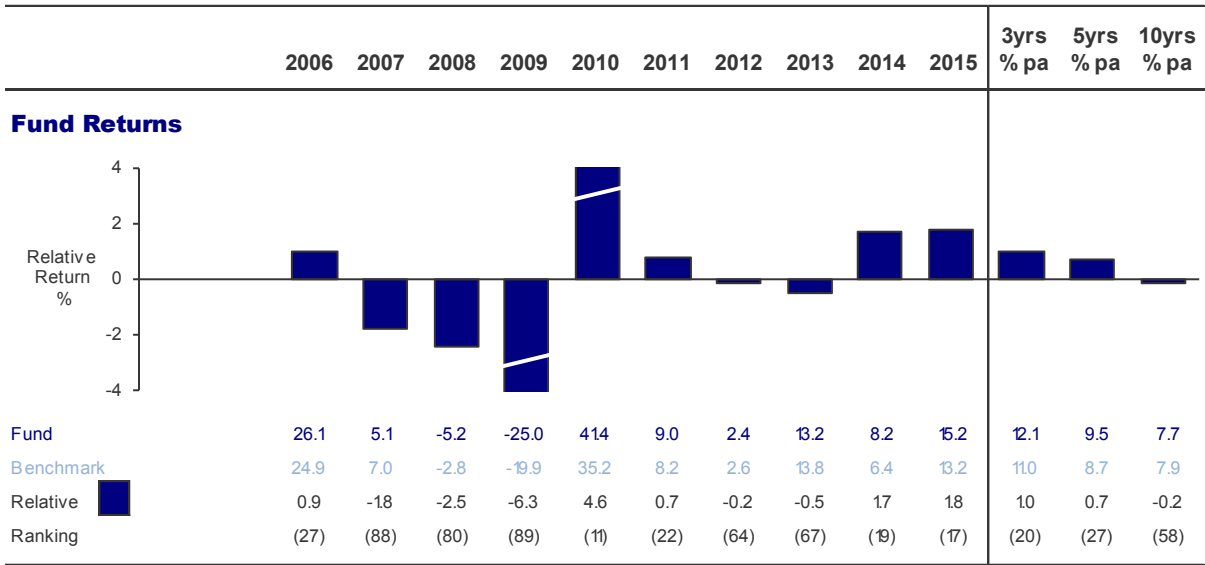
| | | | | | | | | |
|-----------|------|------|------|------|-----|--------|------|------|
| Fund | 15.8 | 20.1 | 9.2 | 18.9 | 0.0 | n/a | 16.8 | 15.2 |
| Benchmark | 13.7 | 13.0 | 10.2 | 12.5 | 1.8 | -100.0 | 15.8 | 13.2 |
| Impact | 1.2 | 0.8 | -0.1 | 0.2 | - | - | 0.1 | 2.2 |

Both equity and bond selection added value. The Fund benefited from having a low UK equity weighting and from having longer duration bonds than its peers.

Longer Term Performance Relative to Other Funds

Fund has comfortably outperformed the peer group over the short and medium term.

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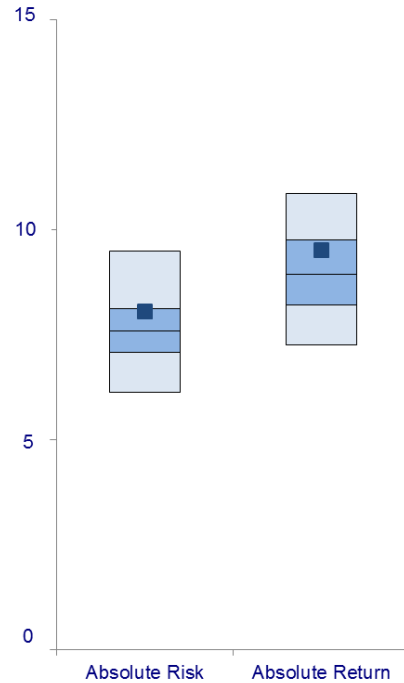
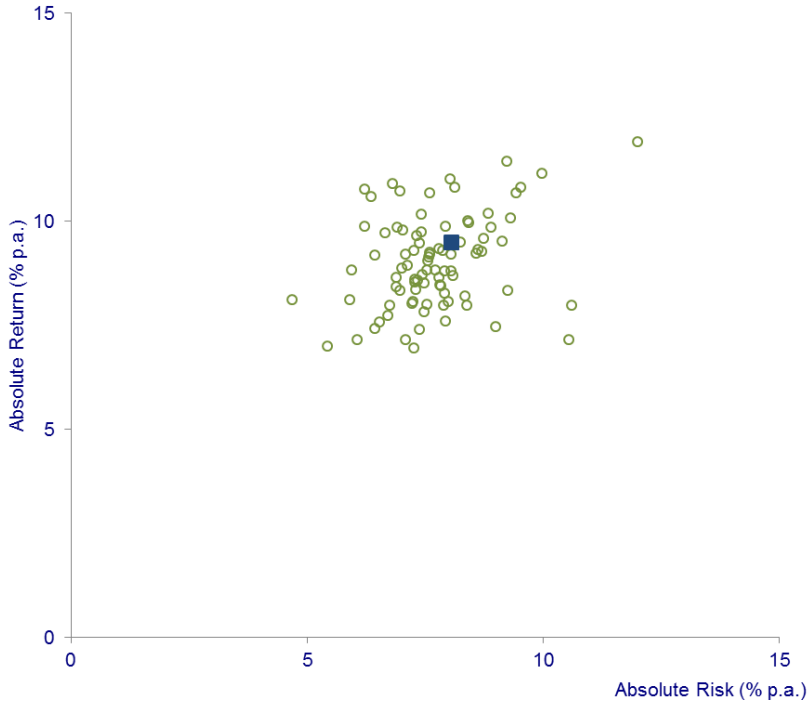


Overall Performance Compared to Other Funds

Last Five Years

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Absolute Risk & Return



Fund is more volatile than its peers but this has been rewarded with a return that is ahead of average.

Summary

- In this year of change the Fund has achieved strong results both in absolute and relative terms.
- Equity performance was strong with Longview in particular continuing to add significant value.
- Relative to other funds performance was good too. The Fund benefited from having a low commitment to the UK equity market and from having a relatively long duration bond portfolio. Currency hedging had a negative effect over the year.

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REPORT FOR: Pension Board

Date of Meeting: 2 November 2015

Subject: Pension Fund Committee Meeting
8 September 2015

Responsible Officer: Dawn Calvert, Director of Finance

Exempt: No

Wards Affected: All

Enclosures: None

Section 1 – Summary and Recommendation

Summary

The report sets out the matters considered by the Pension Fund Committee at their meeting on 8 September 2015 and invites the Board to agree any comments they might wish to make to the Committee.

Recommendation

The Board are invited to consider this report and agree comments to be passed on to the Pension Fund Committee.

Section 2 – Report

1. Matters considered by the Pension Fund Committee at their meeting on 8 September 2015 were as follows:

2. Annual Report and Financial Statements 2014-15

The Committee received the draft report and the final version is included, for the Board's consideration, elsewhere on the agenda.

3. Work Programme for 2015-16

The Committee agreed their work programme for the remainder of 2015-16. As a result of their decision and further officer consideration the agenda for their next meeting on 25 November is as follows:

Responsible and Ethical Investing
London Pension Fund Collaboration (CIV)
Benchmarking and Key Performance Indicators
Statement of Investment Principles
Issues Raised by Pension Board
Pension Fund Risk Register
Work Programme for 2015-16 and 2016-17
Performance of Fund Managers for Quarter ended 31 September 2015 and Valuation at 31 October 2015
Investment Manager Monitoring

As regards working with the Board, the discussion was minuted as follows:

It was noted that members of the Pension Board had been invited to attend the training and public sessions of the Pension Fund Committee but the legal advice received was that they could not attend the private sessions of the Committee. The Pension Fund Committee noted that the Board met twice a year but that it might wish to meet more frequently. Additionally, matters raised by the Board would be reported to the November 2015 meeting of the Pension Fund Committee.

4. Options for Liability Driven Investments Strategy

The Committee spent a considerable amount of time considering this matter and their discussion was minuted as follows:

The Committee received a confidential report of the Director of Finance, which included reports from Aon Hewitt, Council's Investment Adviser, and BlackRock, responding to the decision made by the Committee at its July 2015 meeting that reports from the Investment Adviser and Bonds Fund Manager be submitted to facilitate a decision as to the future Bonds Investment Strategy.

The Chair welcomed Colin Cartwright and Gayathri Varatharajan, representatives from Aon Hewitt, to the meeting. The Committee welcomed Colin Cartwright who had replaced Tony Baily and they looked forward to a positive working relationship with Colin.

Also present at the meeting were Christopher Head and Niren Patel of BlackRock Investment Management.

Colin Cartwright reminded the Committee that at their previous meeting they had received a paper from Aon Hewitt considering two options for the investment of the bonds portfolio in addition to the current investment in corporate bonds and index-linked gilts.

The Committee had discussed changing the asset allocation to provide somewhat greater protection against movements in the value of the liabilities. Consideration was given to whether this might be done through altering the mix of the current bonds portfolio or through the use of a pooled Liability Driven Investment (LDI) strategy.

One of the "Aon Hewitt" options was to transfer the funds invested in the bonds portfolio (13% of the total Pension Fund investments) to an LDI strategy. The Committee asked that Aon Hewitt carry out a modelling analysis covering three LDI options. In the paper provided by Aon Hewitt these options were presented to the Committee.

In addition to the presentation by Aon Hewitt, the representatives from BlackRock were invited to set out some of the practical implications, both advantages and disadvantages, of an LDI Strategy. They addressed the following issues and explained that the data included in their presentation was based on the 2013 actuarial valuation:

- LGPS and liability risk reduction;*
- Bond market outlook;*
- how to address risks;*
- efficient use of Capital;*
- implementation considerations.*

BlackRock highlighted the key drivers of the liabilities of the Fund as inflation expectations and changes in real interest rates.

The Committee was also briefed on the downside of selecting an LDI mandate where the markets were restricted. However, it was also argued that LDIs allowed for improved stewardship and governance without significant risks.

BlackRock and the Committee's advisers discussed various detailed aspects of the LDI approach including the use of collateral and leverage. They indicated that, were the LDI approach to be adopted, it would need to be decided whether to; hedge interest rates and inflation or just one of these; implement immediately or delay until investment conditions might be more favourable; use predetermined 'trigger levels' to implement at a future date.

The presentation by BlackRock was followed by a question and answer session from the Committee and thereafter a debate and discussion on the three LDI options for the Fund ensued. Individual Committee members made the following comments:

- which other local authorities pursued an LDI mandate;*
- the implementation of an LDI option did not require implementation at this stage, particularly as interest rates were expected to rise, but that it ought to be explored at a future date;*
- an ‘in principle’ decision was required and there was a need to be risk averse – be prudent;*
- ‘locking’ of returns on an LDI for a significant number of years required careful consideration;*
- timing of an LDI option was crucial, including the collateral offered;*
- inflation was the key ingredient rather than interest rates as rates were not expected to rise dramatically. It was important to wait and see how the index-linked Gilts would perform and that inflation and interest rates were historically ‘locked’ together and dependant on economics rather than on investment principles;*
- clarification of the duties of the members serving on local authority Pension Fund Committees was essential. The functions of local authority Pension Funds was markedly different from that of private companies who were more suited to an LDI Strategy;*
- liabilities, when valued in 2016, may fall as the Council would continue to shed its staffing resource. Option 1 was the preferred option as it help maximise investment returns which was the major purpose of managing a local authority Pension Fund. The Council did not have much control over its liabilities, including on the levels of employee contributions. It was therefore essential that the right asset classes were chosen. It was important to wait until 2016 and assess the valuation prior to choosing either an LDI Option1 or 2;*
- the Committee needed to understand the risks associated with LDI and a considered view needed to be taken into account on whether or not to move to a LDI Strategy.*

Members sought advice from the Director of Finance and Aon Hewitt, who if the Committee were inclined to move into LDI were inclined towards Option 2. The other alternatives were LDI Option 1 or retention of the status quo. Members noted that Option 1 provided a simple change to the status quo but that Corporate Bonds were an expensive asset to sell and that the transaction costs were high. The gains from Option 1 would be minuscule. They noted that LDI Managers would provide all the support needed on any of the preferred LDI Options and that specialist Transition Managers would not add value.

The Chair was of the view that the timing of an LDI mandate was important and that the Committee could either review the Strategy when market events changed significantly or once the valuation had been carried out in 2016. A number of members supported Option 2 but felt that it ought to be pursued at a future date.

The Committee discussed the circumstances under which Option 2 could be visited and asked Aon Hewitt to provide guidance on the catalyst that could trigger a move to an LDI Option 2 Strategy.

RESOLVED: *That the status quo, a 13% Bond allocation invested in a combination of Corporate Bonds and index-linked Gilts, be retained in relation to the Fund's Bond portfolio and that Aon Hewitt be requested to provide guidance on the catalysts that would trigger a move to an LDI Strategy with Option 2 being the preferred Option.*

5. HB Public Law – Staff Transfer Arrangements

The Committee's discussion was minuted as follows:

The Committee received a confidential report of the Director of Finance setting out the conclusion in respect of negotiations with Barnet Council over the payment of Pension Fund liabilities relating to Legal Services staff that had transferred from Barnet to Harrow.

Members commented as follows:

- *the compromise set out in the report was reasonable;*
- *HB Public Law would continue to grow and officers needed to ensure that the corresponding Pension Fund liabilities were taken into account at an earlier stage. Additionally, any other Shared Services propositions needed to address this issue at an earlier stage. The Director of Finance acknowledged that such considerations would be undertaken at the Business Case stage;*
- *the level of materiality in terms of the contribution rate. The Director of Finance reported that the contribution rate would not alter until a valuation was undertaken. She acknowledged that paragraph 17 of the confidential report did not make the same assumption.*

In response to a question, a representative from Aon Hewitt stated that any interim obligations would have had to be met from Harrow's Pension Fund.

RESOLVED: *That*

- (1) *the offer made by Barnet Council that a sum based on a valuation of £2.57m, calculated under circumstances as at 1 September 2012, be transferred from the Barnet Pension Fund to the Harrow Pension Fund in respect of the transfer of legal staff from Barnet to HB Public Law;*

(2) the Director of Finance, in consultation with the Chair of the Pension Fund Committee, be given delegated authority to agree the sum on the date of cash transfer so long as the shortfall does not exceed £0.616m.

6. London Borough of Harrow Pension Fund: Investment and Management Expenses 2014-15

A report on these matters is included elsewhere on the Board's agenda.

The Committee's consideration was minuted as follows:

The Committee received a confidential report of the Director of Finance which set out the details of investment and management expenses incurred by the Pension Fund during 2014-15.

The Pension Fund Committee noted the variances, particularly the significant one by Pantheon. An officer replied that a more sophisticated calculation tool was now being applied by Pantheon in relation to investment costs levied. A Member stated that the report and the discussion at the meeting had shown that a detailed debate was required on this topic.

In response to a question from an Independent Member, the officer explained the staff costs, including overheads, incurred in the payroll and pension section of the Council.

RESOLVED: *That the report be noted.*

7. Information Report – Investment Manager Monitoring

At each meeting of the Committee they receive a report from their Investment Adviser AonHewitt on each of the fund managers, evaluating their performance and rating them according to:

- Business
- Staff
- Process
- Risk
- Operational Due Diligence
- Performance Analysis
- Terms and Conditions

For each manager they provide an overall rating as follows:

- Buy – clients invest with or maintain their existing allocation to these products
- Buy (Closed) - clients invest with or maintain their existing allocation to these products which are closed to new investors
- Qualified – a number of criteria have been met and investment managers are considered to be qualified to manage client assets
- Sell – termination of investments is recommended
- In Review – rating is under review as factors are evaluated which may cause a change to the current rating

During the Quarter the rating for Standard Life had been increased from “Qualified” to “Buy” and all of the Harrow fund managers have been given either a “Buy” or “Qualified” rating.

8. Information Report – Performance of Fund Managers for Quarter Ended 30 June 2015 and Valuation at 31 July 2015

At each meeting the Committee consider the most recent performance and valuation available to them.

Financial Implications

9. Whilst this report discusses numerous matters relevant to the financial standing of the Pension Fund there are no financial implications arising directly from it.

Risk Management Implications

10. Relevant risks are included in the Pension Fund Risk Register.

Equalities implications

11. There are no direct equalities implications arising from this report.

Council Priorities

12. The financial health of the Pension Fund directly affects the level of employer contribution which in turn affects the resources available for the Council’s priorities

Section 3 - Statutory Officer Clearance

Name: Dawn Calvert Chief Financial Officer

Date: 21 October 2015

Name: Caroline Eccles on behalf of the
Monitoring Officer

Date: 16 October 2015

Ward Councillors notified: Not applicable

Section 4 - Contact Details

Contact: Ian Talbot, Treasury and Pension Fund Manager
0208 424 1450

Background Papers - None

REPORT FOR: Pension Board

Date of Meeting: 2 November 2015

Subject: Benchmarking and Key Performance Indicators

Responsible Officer: Dawn Calvert, Director of Finance

Exempt: No

Wards Affected: All

Enclosures: Guidance for LGPS funds on the 2015 benchmarking exercise (LGPS Scheme Advisory Board)
Key Performance Indicators Pro-Forma

Section 1 – Summary and Recommendation

Summary

The report advises the Board of a request from the LGPS Scheme Advisory Board that each administering authority completes a pro-forma providing information on key performance indicators. It advises the Board of the return sent to the Scheme Advisory Board and invites their comments for passing on to the Pension Fund Committee.

Recommendation

That the Board consider the return on key performance indicators sent to the Scheme Advisory Board and agree any comments they wish to make to be passed onto the Pension Fund Committee at their next meeting on 25 November 2015.

Section 2 – Report

Background

1. On 4 September 2015, the Council, along with all other administering authorities in the Local Government Pension Scheme, were advised that:

The LGPS Scheme Advisory Board (SAB) is undertaking, with support from DCLG, a national exercise to benchmark the performance of all LGPS funds in England and Wales during late 2015 prior to a mandatory exercise linked to 2016 triennial valuations.

During 2014, a suite of 18 LGPS self-assessment key indicators (4 core and 14 supplementary, of which 10 are governance and 8 are performance related) were developed by a SAB Scheme Reporting Working Group (comprising LGPS funds, NAPF, CIPFA, and the ACA). These indicators are the result of considerable input from a working party of administering authorities and other LGPS experts. While not necessarily perfect, they are viewed as a step in the right direction, and will evolve over time in light of feedback and their usage.

Collectively they are designed to help the SAB to nationally assess the relative health of the funds and scheme as a whole. More importantly, the indicators are intended to be a valuable benchmarking tool for administering authorities, and the newly formed Local Boards, to help with the governance process and continuous improvement.

By taking part in this exercise it is an opportunity for your fund to:

- 1) *Assess your fund against the examples of best practice for high performing funds and the examples of concern for each KPI*
- 2) *Inform us how much effort/time/cost undertaking the exercise consumed compared with the < 1 day reported by the pilot funds*
- 3) *Provide general feedback on the KPIs and the examples of best practice and the examples of concern, and to offer suggestions for their further clarification, refinement, and improvement.*

The SAB secretariat will consider the outcome from the 2015 exercise during December 2015. The SAB will make recommendations to DCLG about the KPIs as part of the 31st March 2016 triennial valuation process. They will then be issued in April 2016 and from December 2016 used as tool to assess and support funds accordingly.

2. The Council was required to respond by 31 October and has done so as in the attached Key Performance Indicators Pro-Forma.
3. The Board will note that in the attached Guidance the Scheme Advisory Board encourage administering authorities to share this information with their pension boards who “may use the indicators as a ‘sense check’ or self-audit’ tool.”

4. The completion of this return is timely in that it can be seen quite early by the Board on 2 November and the Pension Fund Committee on 25 November.
5. The board are invited to consider this report and attached return and agree comments to be passed on to the Pension Fund Committee.

Financial Implications

6. Whilst this report refers to numerous matters relevant to the financial standing of the Pension Fund there are no financial implications arising directly from it.

Risk Management Implications

7. Relevant risks are included within the Pension Fund Risk Register.

Equalities implications

8. There are no direct equalities implications arising from this report.

Council Priorities

9. The financial health of the Pension Fund directly affects the level of employer contribution which in turn affects the resources available for the Council's priorities

Section 3 - Statutory Officer Clearance

| | | |
|-----------------------|-------------------------------------|-------------------------------------|
| Name: Dawn Calvert | <input checked="" type="checkbox"/> | Chief Financial Officer |
| Date: 21 October 2015 | | |
| Name: Caroline Eccles | <input checked="" type="checkbox"/> | on behalf of the Monitoring Officer |
| Date: 16 October 2015 | | |

Ward Councillors notified:

NO

Section 4 - Contact Details

Contact: Ian Talbot, Treasury and Pension Fund Manager
0208 424 1450

Background Papers - None

Guidance for LGPS funds on the 2015 benchmarking exercise

Strategic context

The Secretariat to the LGPS Scheme Advisory Board (SAB) would like your help to undertake a national exercise of a suite of LGPS pension fund key performance indicators (KPIs).

By taking part in this exercise it is an opportunity for your fund to:

- 1) Assess your fund against the examples of best practice and concern
- 2) Inform us how much effort/time/cost doing the exercise consumed
- 3) Provide feedback to the SAB on the KPIs before their implementation in 2016

The SAB have agreed that individual LGPS fund performance should be assessed in aggregate using the following 5 key themes:

- 4) Fund governance, management, administration, accountability and transparency
- 5) Funding level, contributions, deficit reduction, and ability to meet pension liabilities
- 6) Asset management strategy, stewardship, and investment returns
- 7) Pension benefits, administration, member service, and communications
- 8) Independent external review and assurance.

The SAB considers that maintaining and improving the overall performance of the LGPS is best done by focusing on improving key financial and governance metrics of “under-performing” funds, and concurrently seeking to raise the level of performance of “average” funds to that of the “highest performing” funds.

The SAB has agreed it is not seeking to develop an LGPS fund league table or multi-tier categorisation system to rank or group all LGPS funds relative performance, because such rankings might be misinterpreted by scheme members and other parties.

The SAB have identified 4 core KPIs (“alarm bells or trip wires”) to identify under-performing funds, and 14 supplementary (“health”) KPIs that can be used to identify where potential management problems lie and improvements could be made.

The 4 core KPIs are in relation to risk management, funding levels and contributions, deficit recovery, and required investment returns. **Table 1** presents the suite of 18 KPIs and **Proforma 1** for the examples of best practice for high performing funds and examples of concern.

The suite of KPIs were developed during 2014 by the SAB Scheme Reporting Working Group that comprises of LGPS fund staff and bodies including some LGPS funds, the NAPF, CIPFA, and the ACA LGPS Sub-Group.

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The Working Group has devised KPIs that:

1) can be considered in aggregate as well as individually, and the examples of high performance which are set high to encourage funds to aspire to best practice and excellence,

2) use existing information that each LGPS fund should already have access to, for example in your 31st March 2015 Annual Report and audited financial statements, fund website, from your fund administrator, actuary, 31st March 2013 triennial valuation, asset custodian, investment performance measurer, and internal or external auditors,

3) can be used to assess and benchmark funds and the whole scheme and over time via repeating the national exercise in future.

The SAB have agreed that they plan to use these KPIs (as improved, clarified or amended by the exercise) to formally assess and benchmark the health of LGPS pension funds as part of the 2016 triennial valuation of the LGPS.

By undertaking such analyses it will enable the SAB to be proactive in encouraging best practice, continuous improvement, and raising standards within the LGPS.

Administering authorities are strongly encouraged to share the KPIs and their assessment and scoring with their Local Pension Board.

Following such a local and national performance review process it might be appropriate for any “outliers” and/or any “under-performing” fund(s) to be either:

1) supported with technical advice and help from adjacent/higher performing LGPS funds or external advisors/consultants; and/or in extremis

2) be placed on watch and possible recommendation to the Secretary of State for intervention and/or remedial action.

However, well before this, the SAB considers the KPIs should be used by individual LGPS funds to develop balanced “score-cards” to undertake an assessment of a fund’s current level of performance (and thus sustainability) against the level of high performing funds. Local Pension Boards may use the indicators as a ‘sense check’ or ‘self-audit’ tool.

Please note your response to this exercise will be seen by the SAB Secretariat and the SAB. The individual fund results from the 2015 exercise are not intended to be made public. However, in future years, individual fund results may be.

LGPS fund actions

The Secretariat would like you to self-assess your fund’s performance relative to the examples proposed for high performing funds and the examples of concern (see Table 1 attached).

The intention is that the key sources of information for assessing your funds achievement of the KPIs should come from:

Scheme Advisory Board Secretariat

Local Government House, Smith Square, London SW1P 3HZ T 020 7187 7344 E liam.robson@local.gov.uk or elaine.english@local.gov.uk W www.lgpsboard.org

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- 1) your fund annual report and audited financial accounts for financial year ending 31st March 2015 and other supporting information published on your fund website or hard copy documents relating to the FY 2014/15,
- 2) fund membership/administrative data and any benchmarking data from your internal/external pension benefits administrator for FY 2014/15,
- 3) fund investment performance information and benchmarking data provided by asset custodian and performance measurer for FY 2014/15,
- 4) actuarial data from your 31st March 2013 statutory valuation and any benchmarking reports produced by LGPS actuaries (e.g. Hymans Robertson) (and if available your updated actuarial position to 31st March 2015),
- 5) your internal audit or external audit reports for FY 2014/15,
- 6) your DCLG LGPS SF3 return for FY 2014/2015.

The Secretariat has communicated with the actuarial firms in the LGPS ACA Sub-Group to help facilitate your actuaries' help to provide you with your 2013 triennial valuation figures for KPI's 2, 3, and 4.

For each KPI, please assess, provide the main source of your evidence (e.g. see page 21 of our 2015 Annual Report or see the Governance section of our fund website) with an e-link and indicate your fund's status in terms of a score for **each** of the examples of best practice or examples of concern on the attached **Proforma 1**.

Please provide explanatory notes you feel would clarify your assessment and scoring for this exercise.

The Secretariat would welcome your feedback on how much effort and time and any costs were consumed to respond to this exercise. We would also welcome general feedback on the KPIs and the examples of best practice and examples of concern, and any suggestions for their clarification, refinement, and improvement, or any better or alternative KPIs.

Please use and return Proforma 1 and your feedback on the KPI exercise by 31st October 2015.

The SAB Secretariat will consider the results of the exercise during December 2015. The SAB will review the outcome of the exercise in early 2016 and will recommend to DCLG the KPIs are considered to be included in LGPS regulations/scheme guidance and/or as part of 31st March 2016 valuation process. They will then be issued in April 2016 and from December 2016 used as tool to assess and support funds accordingly.

Your help and support is most appreciated. If you have any queries about this exercise or the Indicators (Table 1 or Proforma 1) please contact Liam Robson (liam.robson@local.gov.uk). If any national clarifications are needed they will be issued as soon as possible to all LGPS funds.

Issued by the SAB Secretariat, 4th September 2015.

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Table 1

| No | Theme | G/P | Key Indicator | Technical owner of the KPI |
|----|-------|-----|--|---|
| 1 | Gov | G | Risk management (covering all pension fund activities) | CIPFA as the KPIs is based on the CIPFA LGPS risk management guidelines. |
| 2 | Fund | P | Funding level and contributions | SSAB and ACA LGPS Sub-Group |
| 3 | Fund | P | Deficit recovery | SSAB and ACA LGPS Sub-Group |
| 4 | Asset | P | Required investment returns | SSAB and ACA LGPS Sub-Group in consultation with WM as required |
| 5 | Gov | G | Pensions Committee and Pensions Board members competence | CIPFA because the KPI is based on adoption of the CIPFA LGPS training, knowledge, understanding, and disclosure framework |
| 6 | Gov | G | Administering authority staff accountability, leadership, experience, and training | CIPFA because the KPIs is based on the adoption of the CIPFA LGPS training, knowledge, understanding, and disclosure framework. |
| 7 | Gov | G | Statutory governance standards and principles (as per DCLG, SSAB guidance, and TPR codes) | DCLG, SSAB and tPR as the creators of the statutory or best practice governance standards, principles and guidance |
| 8 | Gov | G | Quality and accessibility of information and statutory statements/strategies/policies (Governance, FSS, SIP, comms, admin authority and employer discretions policies) | DCLG as the authors of the guidance on the production of LGPS statutory strategy and policy statements |
| 9 | Asset | G | a) Compliance with Investment Governance Principles (ie Myners principles) and b) voluntary adoption of UK Stewardship Code and UNPRI | SSAB Secretariat in consultation with IGC, FRC, and PRI |
| 10 | Asset | P | a) Historic investment returns (last 1, 3, 5, and 10 years) and b) total investment costs compared to other LGPS funds. | WM (State Street) or other investment performance measurer |
| 11 | Asset | G | Annual report(s) and audited financial statements | DCLG in terms of legal requirements plus CIPFA in terms of LGPS financial reporting and accounting guidance |
| 12 | Pens | G | Scheme membership data | tPR Code of Practice 14 and standards and guidance for common and conditional data |
| 13 | Pens | G | Pension queries, pension payments, and annual benefit statements | DCLG in terms of legal requirements and tPR code 14 and best practice guidance. |
| 14 | Pens | P | Cost efficient administration and overall VFM fund management | CIPFA in terms of defining LGPS administrative costs. |
| 15 | Pens | P | Handling of formal complaints and IDRPCs | DCLG as the KPI is based on their LGPS IDRPC guidance (it needs updating) |
| 16 | Ind | G | Fraud prevention | National Fraud Initiative standards |
| 17 | Ind | P | Internal and external audit | Auditing Practices Board standards |
| 18 | Ind | P | Quality assurance | ISO/BSI quality standards, and or Crystal Mark or Plain English recognition or other recognised e-publishing standards or external awards |

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Table 1 cont.

| Theme | Abbreviation |
|---|--------------|
| Fund governance , management, administration, transparency, and accountability | Gov |
| Funding level, contributions, deficit reduction and ability to meet pension liabilities | Fund |
| Asset management strategy, stewardship, and investment returns | Asset |
| Pension benefits, member services, and communications | Pens |
| Independent external review and assurance | Ind |

| Key indicator type | Abbreviation |
|--|--------------|
| Governance (some degree of subjectivity in assessment) | G |
| Performance (more objective assessment) | P |

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Explanatory notes

The majority of the KPIs are intended to be self-explanatory and have been piloted as such. However, below are some explanatory notes for some of them. Please contact Liam Robson (liam.robson@local.gov.uk) if you have any questions.

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| No. | Key Indicator | Explanatory definitions and notes |
|-----|--|---|
| 2 | Funding level and contributions | <p>Funding level calculated at last triennial valuation (on consistent HMT SCAPE financial assumptions) compared to the actual proportion of the fund's deficit (calculated on the above consistent HMT assumptions) being paid off annually. Actual contributions paid (sourced from annual accounts) as compared with expected total contributions (sourced from last 2 triennial valuations). Net inward cashflows (excluding investment income) as a proportion % pa of fund assets. Use to monitor if negative cash flow is close to or above say 3% of total assets. Above this should be sufficient income from assets to supplement contributions to meet benefit payments without having to sell assets. Not sign of poor performance but risk should be carefully managed.</p> |
| 3 | Implied deficit recovery period | <p>Implied deficit recovery period (derived using figures under indicator 2) reducing each triennial valuation. This metric is not the deficit spreading period used to set contributions. It is the estimated number of years required to repay each fund's deficit assuming a) current levels of contributions continue and b) the liabilities targeted for full funding are measured on like for like HMT assumptions (not each funds valuation assumptions). Also the contributions assumed in the calculation (and other metrics like required future investment return) should be the actual total contribution income expected into a fund based on actual payroll information from each employer at the valuation date and the rates of contribution certified at the valuation. The estimate of aggregate contributions for a fund is not the same as the "common rate" in the valuation report.</p> |
| 4 | Investment returns compared to the funds required future investment return | <p>The fund's required future investment return (calculated as the return needed to repay its deficit over a specified standard period (say 20 years) using common financial assumptions (HMT SCAPE) for the value of the fund liabilities to be met</p> |

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| | | |
|----|---|--|
| | | <p>over that period and assuming the rates of contributions certified at the last valuation). All returns post 1 April 2014 must be quoted net of fees. The required future investment return should also be compared with the estimated future return being targeted by a fund's investment strategy calculated on a consistent agreed basis.</p> |
| 10 | Investment returns and costs compared to other LGPS funds | <p>Historic investment returns (over 1, 3 and 5 year) (and 10 years and longer periods if available) as compared with other LGPS funds from external service provider. Going forward all figures post 1 April 2014 should be net of fees and preferably all investment returns on an agreed and consistent risk adjusted basis. Care will be needed to compare the absolute level of returns between funds because each fund has different asset allocations. Need to use a metric that takes account of performance and/or risk and/or sub-divide funds into high, medium, low growth asset allocation and make comparisons within these categories (not across categories). The required future investment return should also be compared with the estimated future return being targeted by a fund's investment strategy calculated on a consistent agreed basis. Total investment costs should be as per the financial accounts as % of total assets under management. This may need a specialist external service input to do analysis and reporting on a consistent and transparent basis and to enable benchmarking.</p> |

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| No. | Key Indicator | Examples of level for concern | Examples of good practice for high performing fund | Fund score | Evidence and comments |
|-----|--|---|---|--|--|
| 1 | Risk management | <p>No or only a partial and/or an unclear risk register with no or poorly specified or un-implemented mitigation actions over time leading to increased fund risk.</p> <p>No evidence of a risk register being</p> <p>a) prioritised</p> <p>b) annually reviewed by Pensions Committee</p> <p>c) annually reviewed by internal audit or external audit</p> <p>d) used to reduce high risks</p> <p>e) available for public scrutiny.</p> <p>Self score -1 point for each one</p> | <p>Comprehensive risk register covering the key risks (in accordance with current CIPFA guidelines) with prioritisation, robust mitigation actions, defined deadlines, with action tracking to completion.</p> <p>Evidence and e-links to demonstrate</p> <p>a) risks prioritised on a RAG red, amber, green or by a scoring methodology</p> <p>b) completed actions signed off by Pensions Committee after at least annual update,</p> <p>c) annual review by internal audit and external audit</p> <p>d) <3 priority/"red" risks</p> <p>e) public disclosure of a summary version published on fund website or in fund annual report.</p> <p>Self score +1 point for each one</p> | <p>1</p> <p>1</p> <p>1</p> <p>1</p> <p>1</p> | <p>For evidence, please refer to the Council's website, Pension Fund Committee meetings on 25 March 2015 (pages 13-30) and 1 July 2015 (pages 35-52). For evidence concerning the external audit coverage, please refer to the Council's website, Pension Fund Committee meeting 8 September 2015, supplemental agenda pages 159-183.</p> <p>Yes, RAG</p> <p>Yes; Pension Fund Committee considered risk register on 25 March and 1 July 2015</p> <p>Yes; key part of external audit coverage and internal audit kept informed of progress.</p> <p>Zero "red" risks</p> <p>Available on website as detailed above.</p> |
| 2 | Funding level and contributions (see explanatory notes) | <p>a) Decreasing funding level (calculated on a standardised and consistent basis) and/or in bottom decile of LGPS, over the last three triennial valuations on a standardised like for like basis.</p> <p>b) No or minimal employer funding risk assessment and monitoring and not reported to Pensions Committee</p> <p>c) Total actual contributions and actual received in last 6 years less than that assumed and certified in last 2 triennial valuations.</p> <p>d) Net inward cash flow less than benefit outgoings so need for any unplanned or forced sale of assets.</p> <p>Self score -1 for each one</p> | <p>Evidence and e-links to demonstrate</p> <p>a) Funding level rising and getting closer to 100% funded (or above) over last three triennial valuations on a standardised like for like basis. Funding %</p> <p>91 to >100 =score +5</p> <p>80-90 =+4</p> <p>70-79 =+3</p> <p>60-69 = +2</p> <p><59 = +1</p> <p>b) Employer funding risk assessment and monitoring reports to Pension Committee. Net inward cashflow forecasts meeting planned income or significantly exceeding benefit outgoings.</p> <p>c) Total actual contributions received in last 6 years equate to (or exceed) that assumed and certified in the last 2 triennial valuations.</p> <p>d) Net inward cash flow significantly exceeds benefit out-goings</p> <p>Self score a) as above and rest +1 for each one</p> | <p>3</p> | <p>For evidence, please see Actuarial Valuations from Hymans Robertson date 2013, 2010 and 2007.</p> <p>Based on conservative assumptions agreed with Hymans Robertson, over the last three triennial valuations the funding level has gone from 86.6% (2007) to 73.5% (2010) and to 70.3% (2013).</p> <p>Being reviewed as part of risk register and monitoring arrangements.</p> <p>In each of the last two valuations the Actuary has certified that contributions have exceeded those assumed in the previous valuation.</p> <p>Yes, including investment income</p> |
| 3 | Deficit recovery (see explanatory notes) | <p>a) No or opaque deficit recovery plan.</p> <p>b) Lengthening implied deficit recovery period (for contributions)</p> <p>c) Implied deficit recovery periods >25 years for last 3 valuations.</p> <p>Self score -1 point for each</p> | <p>Evidence and e-links to demonstrate :</p> <p>a) Transparent deficit recovery plan for tax raising and non-tax raising bodies.</p> <p>b) Implied deficit recovery reducing each triennial valuation.</p> <p>c) Implied deficit recovery period in line <15 years for last 3 valuations</p> <p>Self score +1 point for each one</p> | <p>1</p> <p>1</p> | <p>For evidence, please see Funding Strategy Statement which is included on the Fund's website as Appendix 5 of the Annual Report and Financial Statements for the year ended 31 March 2015</p> <p>Recovery period stated in Funding Strategy Statement (page 10) and to be paid by a monetary amount rather than a percentage of payroll.</p> <p>Yes, that is the implication of the Strategy</p> <p>For largest employers it has remained at 20 years.</p> |
| 4 | Investment returns (see explanatory notes) | <p>a) Required future investment return (calculated on standardised and prudently consistent basis) not aligned to the investment strategy target return, so lower likelihood of the fund achieving its funding strategy.</p> <p>b) Actual investment returns consistently undershoot actuarially required returns</p> <p>Self score -1 point for each one</p> | <p>Evidence and e-links to demonstrate :</p> <p>a) Required future fund investment return (calc by actuary) are consistent with and aligned to investment strategy (asset mix expected target returns) so higher likelihood of the fund meeting its funding strategy.</p> <p>b) Actual investment returns consistently exceed actuarially required returns</p> <p>Self score +1 point for each one</p> | <p>1</p> <p>1</p> | <p>For evidence, please see Funding Strategy Statement which is included on the Fund's website as Appendix 5 of the Annual Report and Financial Statements for the year ended 31 March 2015</p> <p>Yes. In the opinion of the Fund Actuary "the current funding policy is consistent with the current investment Strategy of the Fund." (page 19)</p> <p>Over the inter-valuation period 2010-2013 investment returns exceeded those expected at the valuation.</p> |

| No. | Key Indicator | Examples of level for concern | Examples of good practice for high performing funds | Find score | Evidence and comments | |
|-----|---|--|---|---|--|---|
| 5 | Pensions Committee and Pension Board members competence | <p>Agonises unclear of statutory role and unable to clearly articulate the funds funding and investment objectives.</p> <p>No evidence of</p> <p>a) different scheme employer types and no or minimal scheme member representation.</p> <p>b) No training needs analysis, or training strategy, or training log or use of CIPFA/LGPS training framework.</p> <p>c) No training record documents</p> <p>d) Self assessment</p> <p>Self score -1 for each one</p> | <p>Agonises unclear of statutory role and unable to clearly articulate the funds funding and investment objectives.</p> <p>Evidence and e-links to demonstrate</p> <p>a) representation from different scheme employer types (scheduled and admitted) and member types (active, deferred and pensioners).</p> <p>b) annual training needs analysis against the CIPFA knowledge and understanding framework.</p> <p>c) annual training records disclosed in Annual Report</p> <p>d) annual self assessment of training undertaken and identification of future needs.</p> <p>Self score +1 point for each one</p> | <p>For evidence please see various Committee reports eg 25 March 2015 pages 39-42</p> <p>Pension Fund Committee completes Councilors and Trade Union Pensioners. Pension Board has full representation from different employer types (scheduled and admitted) and member types (active, deferred and pensioners).</p> <p>Annual report to Committee discussing past and forward training arrangements alongside CIPFA Framework</p> <p>Annual report to Committee discussing past and forward training arrangements alongside CIPFA Framework</p> | <p>1</p> <p>1</p> <p>1</p> | <p>For evidence please see various Committee reports eg 25 March 2015 pages 39-42</p> <p>Pension Fund Committee completes Councilors and Trade Union Pensioners. Pension Board has full representation from different employer types (scheduled and admitted) and member types (active, deferred and pensioners).</p> <p>Annual report to Committee discussing past and forward training arrangements alongside CIPFA Framework</p> <p>Annual report to Committee discussing past and forward training arrangements alongside CIPFA Framework</p> |
| 6 | Administering authority self accountability, leadership, experience, and training | <p>a) No or only part time Head of Fund and/or only part time officers</p> <p>b) No or little induction or on-going training provision or experience recorded on the adoption of CIPFA/LGPS knowledge and understanding framework.</p> <p>Self score -1 for each one</p> | <p>a) Experienced Head of Fund with full time dedicated officers with at least 3+ years' experience.</p> <p>b) staff undertake regular CIPFA/LGPS TKU or other CPD training recorded across all LGPS skills (governance, benefits administration, funding, investments, and claims)</p> <p>Self score +1 point for each one</p> | <p>1</p> | <p>We use Heywoods Active pension system which operates in a similar way to the one used by the Harrow Pension Fund. Over the last year staff have had extensive experience through investment training courses covering Governance, Actuarial and Investment matters and several ad hoc sessions eg property, actuarial, and pensioners. We also have a couple of Government Officers often attend courses provided by the Local Government Association and other organisations. We also have a couple of officers who have gained the CPD in pension administration.</p> <p>Please see comments below</p> <p>We use Heywoods Active pension system which operates in a similar way to the one used by the Harrow Pension Fund. Over the last year staff have had extensive experience through investment training courses covering Governance, Actuarial and Investment matters and several ad hoc sessions eg property, actuarial, and pensioners. We also have a couple of Government Officers often attend courses provided by the Local Government Association and other organisations. We also have a couple of officers who have gained the CPD in pension administration.</p> | <p>1</p> |
| 7 | Statutory governance standards and principles (as per DCLG guidance and TPR codes) | <p>Several key areas of non-compliance with</p> <p>a) DCLG/LGPS statutory guidance</p> <p>b) TPR guidance and codes</p> <p>and reasons why not explained</p> <p>c) No links or references for decision taking records and no or poor self, or scheme members assessment of overall fund effectiveness.</p> <p>Self score -1 for each one</p> | <p>a) Full compliance with DCLG/LGPS statutory guidance</p> <p>b) Full compliance with TPR guidance and codes for public sector pension schemes</p> <p>c) Meet or exceed other LGPS best practice on recording all key decision taking and annual self, scheme employees, scheme member assessment of overall effectiveness.</p> <p>Self score +1 for each one</p> | <p>1</p> <p>1</p> | <p>Please see comments below</p> <p>We use Heywoods Active pension system which operates in a similar way to the one used by the Harrow Pension Fund. Over the last year staff have had extensive experience through investment training courses covering Governance, Actuarial and Investment matters and several ad hoc sessions eg property, actuarial, and pensioners. We also have a couple of Government Officers often attend courses provided by the Local Government Association and other organisations. We also have a couple of officers who have gained the CPD in pension administration.</p> | <p>1</p> <p>1</p> |
| 8 | Quality and accessibility of information and statutory statements, strategies, policies (governance, FSS, SIP, comm, admin strategy and employer/decision policies) | <p>a) Statutory publications not all in place or published on fund website or updated in accordance with regulatory requirements</p> <p>b) Fund and employer decisions not published</p> <p>c) Do not seek to meet any recognised Plain English or e-publishing standards</p> <p>Self score -1 for each one</p> | <p>a) Statutory publications all in place and published on fund website and updated in accordance with regulatory requirements and due timescales.</p> <p>b) Fund and employer decisions published</p> <p>c) Meet Plain English and/or other recognised e-publishing standards.</p> <p>Self score +1 for each one</p> | <p>1</p> <p>1</p> | <p>http://www.harrowpensionfund.org/about-us/forms-and-website</p> <p>Yes all statutory publications are in place and published on fund website</p> <p>Employer decisions published on services fund website. External employers publish their own decisions. Some publications are externally reviewed through the Croydon framework collaborative working group.</p> | <p>1</p> <p>1</p> |
| 9 | Adoption and report compliance with Investment Governance Principles (IGP) (was Myres Principles) and voluntary responsibility to HRC Stewardship Code and UINPRI | <p>a) Overall fund investment returns (net of fees) for last 1, 3, 5 years below two quartiles</p> <p>Score -3 and -5 points</p> <p>b) Return fund managers under performing their mandates for 2 biennial valuation cycles.</p> <p>Score -1 point</p> <p>c) Fund does not benchmark its fund manager and total investment costs relative to other LGPS funds.</p> <p>Score -1 point</p> | <p>a) Overall fund investment returns (net of fees) for last 1, 3, 5 years</p> <p>b) Top quartile score +5 points</p> <p>c) Not the top quartile score +5 and 0 points respectively</p> <p>b) >75% of fund mandates deliver over rolling 3 year performance periods.</p> <p>Score +1 point</p> <p>c) Fund benchmarks its fund manager and total investment costs</p> <p>Score +1</p> | <p>1</p> <p>5</p> <p>1</p> | <p>For evidence, please refer to a report from the Fund's Performance Adviser, State Street Global Services on the Fund's Annual Report and Financial Statements meeting 1 July 2015, pages 13-34.</p> <p>1 year, 15.2% return (top quartile) 3 years 12.7% (top quartile) 5 years 9.5% (second quartile)</p> <p>All managers who have been in place for three years have outperformed their benchmarks; had they not done so their contracts may well have been terminated.</p> <p>Each manager has its own customised benchmark and Fund has benchmarked its investments against the most appropriate national information and advice from professional groups to be as fit as possible.</p> | <p>1</p> <p>1</p> |
| 11 | Annual report and audited financial statements | <p>a) Do not fully meet some regulatory requirements or CIPFA/LGPS guidance</p> <p>b) Not published in Admin Authority Accounts by 1st October</p> <p>c) Published on SAB website after 1st November</p> <p>Self score -1 for each one</p> <p>d) Common data does not meet TPR standards</p> <p>e) Conditional data does not meet the TPR standards. No plans in place to rectify this.</p> <p>Self score -1 for each</p> <p>f) No or poor website with no scheme member or employer access.</p> <p>g) ABS do not meet regulatory requirements or due timescales for issuance.</p> <p>Self score -1 for each</p> | <p>a) Meet all regulatory and CIPFA best practice guidance</p> <p>b) Publish in Admin Authority Accounts by 1st October</p> <p>c) Publish fund report and accounts of SAB website before 1st November.</p> <p>d) >90% of conditional data meets TPR quality and due date standards</p> <p>e) >95% of conditional data meets TPR quality and due date standards. Plans in place to improve this.</p> <p>Self score +1 for each one</p> <p>f) Good website with interactive scheme member and employer access.</p> <p>g) ABS meet or exceed regulatory standards and due timescales for issuance.</p> | <p>1</p> <p>1</p> <p>1</p> <p>1</p> <p>1</p> | <p>For evidence, please refer to the Fund's website to see the Annual Report and Financial Statements for the year ended 31 March 2015</p> <p>The 2015 Annual Report and Financial Statements 2015 meet all regulatory and CIPFA best practice guidance. No substantive amendments were required during the external audit process and the only matter raised in the annual letter was a relatively minor issue relating to the Annual Report and Financial Statements 2015. It was available for audit by 30 June 2015, draft presented to the Board on 1 July 2015, signed off by the External Audit Committee on 22 July 2015, signed off by external audit on 24 September 2015, published on website by 1 October 2015.</p> <p>Will be available for SAB by 1 November 2015.</p> <p>Please see below</p> <p>Our pension records are kept up to date on an ongoing basis to TPR standards and meet due date standards. Inward pensioners address details. Carry out an annual data exercise and receive Requirement met</p> | <p>1</p> <p>1</p> <p>1</p> <p>1</p> <p>1</p> |
| 12 | Scheme membership data | <p>a) No or poor website with no scheme member or employer access.</p> <p>b) ABS do not meet regulatory requirements or due timescales for issuance.</p> <p>Self score -1 for each</p> | <p>a) Good website with interactive scheme member and employer access.</p> <p>b) ABS meet or exceed regulatory standards and due timescales for issuance.</p> | <p>1</p> <p>1</p> | <p>For evidence please refer to the Fund's website @ http://www.harrowpensionfund.org</p> <p>Please refer to the active newsletter on the fund website, this is produced at the same time the benefit statements are issued and contains information regarding the benefit statement. http://www.harrowpensionfund.org/newsletters</p> | <p>1</p> <p>1</p> |
| 14 | Cost efficient administration and overall WHM fund management | <p>a) In bottom quartile with high total admin cost per member (based CIPFA or other benchmark tool)</p> <p>b) Not in any national or regional frameworks for any externally procured services or collective investments.</p> <p>Self score -1 for each</p> | <p>a) In top quartile with low total admin cost per fund member (based CIPFA or other benchmark tool) calculated on a consistent and transparent basis.</p> <p>b) Lead and/or actively participates in collaborative working and collective LGPS procurement, shared services or C/IVs</p> | <p>1</p> <p>1</p> | <p>We last participated in the CIPFA benchmark in 2013 and were in the top quartile. Croydon franchised collaborative working group and have acquired investment adviser and actuarial services through the framework process.</p> | <p>1</p> <p>1</p> |
| 15 | Handling of formal complaints and IDRP's | <p>a) Key members' Ombudsman determinations (and any appeals) filed were against the actions of the fund (ie not employer).</p> <p>Score -1</p> | <p>a) No Stage 2 IDRP's and no Pensions Ombudsman findings against the fund actions in last 3 years.</p> | <p>1</p> | <p>No stage 2 IDRP's</p> <p>A Life certificate exercise is carried out each year for Harrow pensioners. Evidence of this can be found in the pensioner's annual statement. http://www.harrowpensionfund.org/newsletters/2015/06/2015-annual-statement</p> <p>Comments: Pensioner's 2015 Focus 2015 Newsletter 2015.pdf. Have also signed up for the DWP Rail as once service which is due to be launched shortly.</p> <p>We participate in the bi-annual national fraud initiative.</p> | <p>1</p> |
| 16 | Fraud prevention | <p>a) No or minimal systems/programme or plan or mechanisms in place to prevent fraud</p> <p>b) Detect fraud</p> <p>c) Detect pension over-payments due to unreported deaths</p> <p>Self score -1 for each one</p> | <p>a) Full or substantial assurance against all key audit areas with no high risk recommendations.</p> <p>b) Use external monthly, quarterly/annual mortality screening services, and</p> <p>c) Participate in bi-annual National Fraud Initiative.</p> <p>Self score +1 for each one</p> | <p>1</p> <p>1</p> | <p>No stage 2 IDRP's</p> <p>A Life certificate exercise is carried out each year for Harrow pensioners. Evidence of this can be found in the pensioner's annual statement. http://www.harrowpensionfund.org/newsletters/2015/06/2015-annual-statement</p> <p>Comments: Pensioner's 2015 Focus 2015 Newsletter 2015.pdf. Have also signed up for the DWP Rail as once service which is due to be launched shortly.</p> <p>We participate in the bi-annual national fraud initiative.</p> | <p>1</p> <p>1</p> |
| 17 | Internal and external audit | <p>a) No annual internal audit or qualified internal and external audit opinions</p> <p>b) Urgent management action recommended on high serious risks.</p> <p>c) Only moderate or low level of assurance and a number of high priority action recommended</p> <p>Self score -1 for each</p> | <p>a) Unqualified annual internal reports with no or only low priority management actions</p> <p>b) Unqualified and annual external audit with no or only low priority management recommendations.</p> <p>c) Full or substantial assurance against all key audit areas with no high risk recommendations.</p> <p>Self score +1 for each</p> | <p>1</p> <p>1</p> <p>1</p> | <p>For evidence concerning the external audit, please refer to the Council's website. Pension Fund Committee meeting 8 September 2015, supplemental agenda pages 159-163. http://www.harrowpensionfund.org/newsletters/2015/09/2015-annual-statement</p> <p>Evidence can be obtained from the Head of Internal Audit (0208 424 1420).</p> <p>Yes; all internal audit requirements satisfied</p> <p>Yes; unqualified audit completed with only a relatively minor issue in connection with the risk register included in the management letter (see table last indicator 1 above)</p> | <p>1</p> <p>1</p> <p>1</p> |
| 18 | Quality assurance | <p>a) Quality management system</p> <p>b) External reviewed publications</p> <p>c) Externally approved website accessibility</p> <p>Self score -1 for each one</p> | <p>a) Fund has formal quality management external certification</p> <p>b) Crystal Mark for plain English for publications/forms</p> <p>c) Externally approved website accessibility</p> <p>Self score +1 for each one</p> | <p>1</p> <p>1</p> <p>1</p> | <p>Harrow website is hosted by an external provider</p> | <p>1</p> |