

16 September 2016

To: All Members of the Pensions Committee and Board

Dear Member,

Pensions Committee and Board - Tuesday, 20th September, 2016

I attach a copy of the following reports for the above-mentioned meeting which were not available at the time of collation of the agenda:

**8. ANNUAL PENSION FUND REPORT AND ACCOUNTS (PAGES 1 - 122)**

Report of the Chief Operating Officer to present the audited Pension Fund Annual Report and Accounts for 2015/16 and the Annual Governance Report of the external auditors, BDO, which reports on their annual audit of the Pension Fund accounts.

**9. ILL HEALTH LIABILITY INSURANCE REPORT (PAGES 123 - 136)**

Report of the Chief Operating Officer to provide information relating to ill health liability to the Pension Fund and how this liability could be mitigated by taking out ill health liability insurance, and also proposing three options to adopt as to the level of ill health insurance that should be adopted by the Fund and how the cost of purchasing ill health liability insurance should be funded.

**18. REVIEW OF FUND GOVERNANCE (PAGES 137 - 194)**

Report of the Chief Financial Officer.

Yours sincerely

Helen Chapman  
Principal Committee Co-ordinator

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**Report for:** Pensions Committee 20<sup>th</sup> September 2016

**Item number:** 8

**Title:** Pension Fund Annual Report and Accounts

**Report authorised by:** Tracie Evans, Chief Operating Officer (COO)

**Lead Officer:** Oladapo Shonola, Head of Finance - Treasury & Pensions  
[oladapo.shonola@haringey.gov.uk](mailto:oladapo.shonola@haringey.gov.uk) 02084893726

**Ward(s) affected:** N/A

**Report for Key/  
Non Key Decision:** Non Key decision

**1. Describe the issue under consideration**

1.1 This report presents the audited Pension Fund Annual Report and Accounts for 2015/16 and the Annual Governance Report of the external auditors, BDO, which reports on their annual audit of the Pension Fund accounts.

**2. Cabinet Member Introduction**

2.1 Not applicable.

**3. Recommendations**

3.1 That the Committee consider the contents of this report and any further verbal updates given at the meeting from BDO.

3.2 That the Committee approves the Pension Fund Annual Report and Accounts for 2015/16.

3.3 That the Chair and Chief Operating Officer are authorised to sign the letter of representation to the Auditor.

**4. Reason for Decision**

4.1. The Committee is required by law to approve the Annual Pension Fund Report and Accounts prior to publication.

**5. Other options considered**

5.1. None.

## 6. Background information

- 6.1. The Local Government Pension Scheme Administration Regulations 2008 require local government pension funds to produce an annual report every year to be published by 1<sup>st</sup> December following the year end. One of the key components of the annual report is the audited pension fund accounts for the year. The pension fund accounts are also required to be part of the Council's main accounts, even though they are audited separately. The deadline for the publication of the Council's audited accounts is 30<sup>th</sup> September each year.
- 6.2. At the Pensions Committee meeting on 11<sup>th</sup> April 2016 BDO presented their plan detailing how they would undertake the audit of the 2015/16 accounts. The Audit Commission's statutory Code of Practice for Local Government bodies requires the external auditor to report to those charged with governance on matters arising from their audit before it is finalised.

## 7. Contribution to Strategy Outcomes

- 7.1. Not Applicable

## 8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

### Finance and Procurement

- 8.1. The Chief Financial Officer is pleased to report that the Pension Fund auditors have given an unqualified audit opinion to the financial statements. One recommendation concerning the monitoring of contribution rates has been accepted.

### Legal Services Comments

- 8.2. As the report confirms the Authority is required to publish a pension fund annual report in a specific format annually on or before 1 December of the year following the year end to which the annual report relates. Regulation 57 of the Local Government Pension Scheme Regulations 2013 sets out this requirement. The annual report annexed to this report must comply with the requirements of Regulation 57.

- 8.3. Members must take into account any verbal updates given (if any) by BDO at the meeting prior to approving the Pension Fund Annual Report.

### Equalities

- 8.4. There are no equalities issues arising from this report.

## 9. Use of Appendices

- 9.1. Appendix 1: Pension Fund Annual Report and Accounts 2015/16
- Appendix 2: ISA260 - Annual Governance Report, BDO (Draft)
- Appendix 3: Letter of Representation

## **10. Local Government (Access to Information) Act 1985**

- 10.1. Not applicable.

## **11. Annual Report and Accounts 2015/16**

- 11.1. The annual report has been prepared in accordance with the Local Government Pension Scheme Regulations 2013 and includes all the items required.
- 11.2. The first section of the report sets out what the management arrangements for the Pension Fund were during 2015/16 including the committee membership and the Fund's advisers. The following section covers investments setting out the investment strategy operated during the year and the resulting performance. The administration section is next, describing the administration arrangements during the year and reporting on the membership. The results of the last formal actuarial valuation are set out in the funding section. The Financial report follows and the appendices are the latest versions of the Pension Fund's policy statements.
- 11.3. The accounts are made up of the Fund Account, which shows income and expenditure during the year, the Net Assets Statement, which shows the Fund's investments and other asset and liabilities at the end of the year and the Notes to the Accounts which provide more detail about the figures in the Fund Accounts and the Net Assets Statements.
- 11.4. The market value of the Fund was £1,046m as at 31<sup>st</sup> March 2016, an increase of £1m from March 2015. Investments added £3m net of expenses, while benefits and other expenditure exceeds contributions and transfers in by £2m.

## **12. Auditor's Annual Governance Report**

- 12.1. The ISA 260 - Annual Governance Report from BDO is attached at Appendix 2. This sets out their findings in detail. The report will be presented to the meeting by Leigh Lloyd- Thomas, Audit Engagement Lead

## **13. Internal Audit Reports**

13.1. The Fund's risk register which is on the agenda will form the basis for establishing future audit plans for the Scheme/Fund. Any internal audit reports arising from such audits will be presented to Committee in due course.

#### **14. Letter of Representation**

14.1. The Chair and the Chief Financial Officer are required to sign a letter of representation to acknowledge the Council's responsibility for the fair presentation of the information in the financial statements and the Pension Fund Annual Report. A proposed draft of this letter is shown at Appendix 3 of this report for the Committee's information.

**Annual Pension Fund Report and Accounts**

**For the year ended 31 March 2016**

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## Introduction

Haringey Council presents its Annual Report and Accounts of the Haringey Local Government Pension Fund for the year ended 31<sup>st</sup> March 2016.

The Local Government Pension Scheme is a defined benefit Pension Scheme and was established on 1<sup>st</sup> April 1965. The Scheme is a Registered Pension Scheme under Chapter 2 of Part IV of the Finance Act 2004 and is contracted-out of the State Second Pension (S2P). It is a national scheme run locally by councils nominated as “Administering Authorities”.

Haringey Council is the Administering Authority in the Haringey area and runs the Scheme to provide retirement benefits to all eligible employees of Haringey Council and other eligible organisations in the Haringey area. More detail about these organisations can be found in the Membership section on page 9. The Management report on page 4 provides information about how the scheme is run. The registration number is 00329316RX.

## Scheme Rules

The benefits payable in respect of service from 1st April 2014 are based on career average revalued earnings and the number of years of eligible service. Pensions are increased each year in line with the Consumer Price Index. For service prior to April 2014 benefits are based on final salary and years of service. Other than in accordance with legislative requirements, there were no increases to benefits in payment in the year. The Administration report on page 21 provides details about the administration of the Scheme.

## Membership

There were 6,229 active members (2015: 5,958), 8,519 (2015: 8,678) deferred members, and 7,304 (2015: 7,080) pensioners and dependents receiving benefits. More details can be found in the Membership section on page 9.

## Financial position

The financial statements and notes on pages 30 to 52 show that the value of the Fund's assets increased by £0.9m to £1,046.3m as at 31 March 2016. The most significant factor in the increase in the value of the fund was the investment income which added £4.7m to the fund. Increase in the market value of investments added £3.2m. These increases were offset by management expenses of £4.4m and a net deficit of £2.5m resulting from benefit payments being more than contributions.

## Investments

During the year the rate of return on the Fund's investments was 0.8%. This was 1.05% below the Fund's target for the year. More details of the investment strategy and the performance can be found on page 12.

## Funding position

The last formal valuation of the funding position took place as at 31<sup>st</sup> March 2013, when the funding level was 70%. Details can be found in the Funding report on page 26. The next formal valuation will be carried out as at 31<sup>st</sup> March 2016.

## **Management & Financial Performance Report**

Governance Arrangements

Service Delivery

Pension Fund Advisers

Management report for 2015/16

Membership

**Governance Arrangements**

Haringey Council in its role as Administering Authority delegated responsibility for administering the Pension Scheme to the Pensions Committee during the year. Details of the individuals who served on the Pensions Committee during 2015/16 are shown below.

The terms of reference for Pensions Committee are set out in the Council's constitution. The Committee consisted of elected Councillors, with full voting rights and three representatives. Councillors are selected by their respective political Groups and their appointment was confirmed at a meeting of the full Council. They were not appointed for a fixed term but the membership is reviewed regularly by the political groups. The three representatives were appointed by their peer groups. The membership of the Committee during the 2015/16 year was:

Cllr Clare Bull	Chair
Cllr John Bevan	Vice Chair
Cllr Dhiren Basu	
Cllr Sheila Peacock	
Cllr Viv Ross	
Cllr Reg Rice	
Roger Melling	Employee representative
Michael Jones	Pensioner representative
Keith Brown	Admitted & Scheduled Bodies representative

**Governance Compliance Statement**

The Pension Fund has published a Governance Compliance Statement in accordance with the LGPS Regulations and this is set out in Appendix 1 on page 59. The objective of the statement is to make the administration and stewardship of the Pension Fund transparent and accountable to all stakeholders.

**Pension Board**

Regulations require that all Local Government Pension Schemes establish a pension board by 1<sup>st</sup> April 2015, whose role is to assist the Council to ensure compliance with regulations and also effective and efficient governance and administration. The Board is intended to operate alongside the Pensions Committee, with the latter retaining the decision making authority. The Council has established a Pension Board in compliance with regulations but has requested Government approval to allow the existing Pensions Committee to undertake the role of the Pension Board.

## Service Delivery

Haringey Council Pension Service is composed of two distinct arms: Fund Management and Pension Administration. These two functions are run from two business units in Haringey Council; Fund Management is part of Finance while Pensions Administration is part of Human Resources.

Finance is responsible for fund management work. Key tasks include:

- Support to the Committee to set investment strategy and monitor investment performance;
- Managing the contracts with the Pension Fund's advisers;
- Producing the annual Pension Fund budget and Annual report and accounts; and
- Maintaining the key governance statements the Pension Fund is required to publish (the current versions can be found in the Appendices).

The Scheme Administration report on page 20 sets out the key tasks of the Pensions Administration service.

The Pension Fund's internal auditors are Mazars Public Sector Internal Audit Limited. Regular audits are carried out on both Pension Fund investments and Pensions administration.

### Key Officer Contacts

Chief Operating Officer  
Assistant Director – Finance  
Head of Legal Services and Monitoring Officer  
Head of Finance: Treasury & Pensions  
Pensions Manager

Tracie Evans  
Anna D'Alessandro  
Bernie Ryan  
Oladapo Shonola  
Janet Richards

## Pension Fund Advisers

The Pension Fund retains a number of advisers to provide specialist advice and services. The contracts with these advisers are reviewed on a regular basis. A list of all advisers is provided below:

Secretary to the Committee	Head of Local Democracy and Member Services
Scheme Administrator	Chief Operating Officer
Actuary	Hymans Robertson
Investment Managers	Legal & General Investment Management BlackRock Investment Management CBRE Global Investors Pantheon CQS Allianz Global Investors
Custodian	Northern Trust
Investment Consultants	Mercer
Independent Adviser	John Raisin Financial Services Limited
Bankers	Barclays Bank Plc
Legal advisers	Head of Legal Services, London Borough of Haringey
Additional Voluntary Contribution providers	Clerical and Medical Equitable Life Assurance Society Prudential Assurance
Internal Auditors	Mazers Public Sector Internal Audit Limited
External Auditors	BDO LLP

## **Management Report for 2015/16**

### Financial Performance

The investment performance during the year was positive at 0.8% with all markets in which the Fund invests providing returns in excess of 10%, with the exception of UK and European equities that returned 7-8%. The performance was slightly below target (by 0.75%) mainly due to the relative returns from property & private equity. The latter typically underperforms when markets are rising strongly due to timing of valuations.

### Administrative Management Performance

On 1<sup>st</sup> April 2011, the Fund implemented a Pension Administration Strategy Statement. Details of the monitoring of the strategy are set out in the Scheme Administration report. During the financial year 2015-16 no formal action has been taken against any employers. The only breaches of the performance standards have been minor and have been dealt with informally. The timeliness of contribution payments from employers in the Fund has been monitored by Corporate Committee on a quarterly basis and issues followed up by the Fund's officers.

Total membership of the Fund increased by 336 to 22,052 between the years.

### Risk Management

Investment risk is a key risk which the Fund is exposed to due to the range of different types of assets the Fund has chosen to invest in. All investments are undertaken in line with the Local Government Pension Scheme (Management & Investment of Funds) Regulations 2009 and in consideration of advice from the Fund's investment adviser and from the Independent Adviser.

The Committee has set an investment strategy which involves a wide range of asset classes and geographical areas. This provides diversification which reduces the risk of low and volatile returns. Following the decision to invest the majority of the Fund on a passive basis, the risk of underperforming the benchmark has been significantly reduced.

The majority of the Pension Fund's assets are managed by external fund managers and they are required to provide audited internal controls reports regularly to the Council, which set out how they ensure the Fund's assets are safeguarded against loss and misstatement.

The Committee consider reports on investment performance, responsible investment activities and other pertinent matters relating to investments and fund managers on a quarterly basis.

## **Membership**

Haringey Council is the Administering Authority for the Haringey Pension Fund and eligible staff are members of the scheme. In addition the Pension Fund has a number of other organisations participating in the Fund.

A scheduled body is a public body which is required by law to participate in the LGPS. Each scheduled employer is listed in the LGPS regulations.

A transferee admission body is an employer permitted to participate in the LGPS. This might be a non profit making body carrying out work that is similar in nature to a public service like local government or it might be a private company to which a service or assets have been outsourced.

A community admission body is an organisation providing a public service in the UK otherwise than for gain. The organisation is expected to have sufficient links with the Council such that it is regarded as having a community interest.

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

	<b>Active</b>	<b>Ceased</b>	<b>Total</b>
Scheduled body	5,283	15,247	<b>20,530</b>
Admitted body	946	576	<b>1,522</b>
<b>Total</b>	<b>6,229</b>	<b>15,823</b>	<b>22,052</b>

The membership of the Pension Fund at 31<sup>st</sup> March 2016 compared with the previous financial year is shown in the table below.

	<b>31<sup>st</sup> March 2016</b>	<b>31<sup>st</sup> March 2015</b>
Active members	6,229	5,958
Deferred members	8,519	8,678
Pensioners & Dependants	7,304	7,080
<b>TOTAL</b>	<b>22,052</b>	<b>21,716</b>

The table above shows an overall increase in membership of 1.5% due to staff increases at academy employers and auto enrolment of new joiners.

A schedule of the membership from each of the employers is shown overleaf.

	Active	Deferred Beneficiaries	Pensioners and Dependants
<b>Scheduled Bodies</b>			
Haringey Council	4640	7656	6690
Haringey Magistrates	0	19	19
College of Haringey, Enfield and North East London	151	260	139
Greig City Academy	52	26	4
Homes for Haringey	440	219	183
Total Councillors Scheme 101	0	22	10
	<b>5,283</b>	<b>8,202</b>	<b>7,045</b>
<b>Admitted Bodies</b>			
Haringey Age UK (00003)	1	3	16
CSS (Haringey ) Ltd (00006)	0	26	54
Haringey Citizen Advice Bureau (00007)	4	2	6
Jarvis Workspace Ltd (00010)	0	20	22
Alexandra Palace Trading Co. (00008)	3	7	12
Urban Futures London Ltd (00011)	2	7	2
Enterprise (formerly Accord) Ltd (00012)	0	38	44
Capita Business Services (00014)	0	0	0
Mittie (formerly Trident ) Securities Ltd (00015)	0	0	2
Initial Catering Ltd (00016)	0	1	1
OCS Group Ltd (00021)	0	1	1
Harrisons Catering (00017)	0	1	2
R M Education PLC (00023)	0	3	0
Cooperscroft Care Home Limited(TLC At Cooperscroft (formerly Rokeley Dene) (00020)	7	11	7
Ontime Parking Solution (00025)	0	3	1
Europa (00026)	0	0	1
John Loughborough School (00019)	0	11	8
Fortismere School (00022)	43	26	8
Veolia (00027)	92	32	21
Alexandra Park School (00028)	77	19	6
Woodside School (00029)	69	4	1
Eden School (00030)	13	4	0
Churchills (00031)	2	1	1
Harris Academy Coleraine (00032)	45	5	0
Harris Academy Philip Lane (00033)	31	7	2
AET Trinity Primary (00034)	28	6	2
AET Noel Park (00035)	49	4	2
Fusion Lifestyle (00036)	43	22	3
Cofely Workplace Limited(formally Balfour Beatty Workforce) (00037)	47	18	18
Haringey 6th Form Centre (00038)	63	8	2
St Pauls & All Hallows Infants Academy (00039)	20	2	1
St Pauls & All Hallows Junior Academy (00040)	14	1	0
St Michaels N22 Academy (00041)	20	4	2
St Ann CE Academy (00042)	15	3	4
Holy Trinity CE Academy (00043)	13	3	0
Brook House Primary (formally Hartsbrook) (00044)	13	2	0
St Thomas More School (00045)	29	4	5
Heartlands High School (00046)	82	7	0
Milbrook Park Primary School (00047)	6	0	0
Harris Academy Tottenham (00048)	8	0	0
Lunchtime St Gildas School (00049)	2	0	0
Lunchtime St Francis De Sales School (00050)	4	0	0
Lunchtime St Marys School (00051)	4	1	1
Lunchtime St Pauls RC School (00052)	2	0	1
Lunchtime Ferry Lane School (00053)	3	0	0
Lunchtime Bounds Green School (00054)	4	0	0
ABM Weston Park School (00055)	2	0	0
ABM Muswell Hill (00056)	2	0	0
Caterlink Bruce Grove School (00058)	3	0	0



ISS Crowland School (00059)	1	0	0
Superclean Willow School (00060)	2	0	0
The Octagon (00061)	15	0	0
Absolutely Catering Rokesly School (00062)	3	0	0
Caterlink Holy Trinity School (00063)	2	0	0
Caterlink St Michaels School (00065)	3	0	0
Caterlink St Pauls and All Hallows School (00066)	5	0	0
Tottenham University Technical College (00067)	10	0	0
Lunchtime Seven Sisters (00068)	3	0	0
Lunchtime Welbourne (00069)	4	0	0
Lunchtime Earlsmead (00070)	3	0	0
Amey Community Limited (00071)	30	0	0
	<b>946</b>	<b>317</b>	<b>259</b>
<b>Grand total</b>	<b>6,229</b>	<b>8,519</b>	<b>7,304</b>

## **Investment Policy & Performance Report**

Investment Strategy

Responsible Investment

Fund Managers

Investment Performance

Market Developments 2015-16

## Investment Strategy

The Pension Fund's investment strategy is formulated within the parameters of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009.

Pensions Committee is responsible for setting investment strategy with the aid of independent advice from the Pension Fund's advisers. Day to day investment decisions are delegated to fund managers.

The strategy is set out in detail in the Statement of Investment Principles, which is shown in Appendix 2 on page 76. All investments were externally managed, with the exception of a small allocation of cash used to meet benefit payments, which was held in-house.

In January 2014 a revised strategic asset allocation was agreed that reduced the allocation to listed equities by 10% (to 60%) and created two new allocations of 5% each – Infrastructure debt and multi-sector credit. The implementation of the new strategy took place during the prior year.

The Fund's benchmark showing target asset allocation during 2015-16 is shown below, alongside the actual allocation of the Fund's investments at 31<sup>st</sup> March 2016. The financial statements show that the Fund is invested in pooled funds and the breakdown in the table below shows the allocation of the underlying holdings.

<b>Asset class</b>	<b>Benchmark %</b>	<b>Actual % at 31-Mar-16</b>
UK Equities	15	16%
Overseas Equities	45	50%
UK Index linked gilts	15	14%
Multi Sector credit	5	4%
Infrastructure debt	5	2%
Property	10	9%
Private Equity	5	3%
Cash*	0	1%

\*Excludes cash held by Haringey Council

### Custodial arrangements

The Council employs Northern Trust to act as independent custodian of the Pension Fund's investments. As professional custodians, they employ a rigorous system of controls to ensure the safekeeping of assets entrusted to them. The custodian is responsible for the settlement of all day-to-day investment transactions, collection of investment income and the safe custody of the Pension Fund's investments.

## Responsible Investment

The Pension Fund believes that the adoption by companies of positive Environmental, Social and Governance principles can enhance their long term performance and increase their financial returns. These issues are of concern to the Fund because it is considered that companies who do not have regard for the social and environmental impact of their business, or who conduct their business in a way which is not sustainable over the longer term are in danger of adversely affecting the future prospects of the company, and potentially the company's long term share price.

Due to the need to prioritise fiduciary duty, the Fund does not participate in stock screening or exclusionary approaches. Instead the Fund seeks to influence the behaviour of companies through engagement. This engagement is undertaken through the following parties:

- The Fund's investment managers
- Local Authority Pension Fund Forum (LAPFF)
- National Association of Pension Funds (NAPF)

The Fund maintains membership of the LAPFF and the NAPF in order that engagement can be undertaken on its behalf.

In addition to this, all the Fund's managers are signatories to the 'United Nations Principles for Responsible Investment' initiative.

On a quarterly basis the Corporate Committee receive reports on the engagement activity undertaken on behalf of the Fund, covering environmental issues, governance and remuneration and all other responsible investment issues.

## Fund Managers

The Pension Fund has appointed external fund managers to undertake day to day management of the Fund's investments. Each fund manager is appointed with a mandate covering a defined asset class or classes with a target set that relates to a benchmark covering the asset class or classes they are managing. The fund managers in place during the 2015-16, the asset classes they cover and their percentage of the Fund's investments on 31<sup>st</sup> March 2016 are shown in the table below (the remaining 1.1% was invested in-house in cash):

<b>Investment Manager</b>	<b>Mandate</b>	<b>% at 31 March 2016</b>
Legal & General Investment Management	Passive Global Equities & Bonds	77.5%
CBRE Global Investors	Property	10.6 %
Pantheon	Private Equity	4.2%
CQS	Multi Sector Credit	4.5%
Allianz Global Investors	Infrastructure Debt	2.1%

NB: the allocations above relate to total assets. Page 41 is based on investment assets only.

The benchmarks and targets set for the fund managers are detailed below:

**Passive managers** – target is to meet the benchmark:

<b>Asset class</b>	<b>Benchmark</b>
UK Equities	FTSE All Share
North American Equities	FT World Developed North America GBP Unhedged
European Equities	FT World Developed Europe ex UK GBP Unhedged
Japanese Equities	FT World Developed Japan GBP Unhedged
Pacific ex Japan Equities	FT World Developed Pacific ex Japan GBP Unhedged
Emerging Markets Equities	FT World Global Emerging Markets GBP Unhedged
Index Linked Gilts	FTA Index Linked Over 5 Years Index

### **Active managers**

<b>Investment Manager</b>	<b>Benchmark</b>	<b>Target over 3 year rolling periods</b>
CBRE Global Investors	HSBC/APUT Balance Funds Index	+1 % (gross) of fees p.a.
Pantheon	MSCI World Index plus 3.5%	Benchmark
CQS	3 month libor +5.5%	Benchmark
Allianz Global Investors	5.5% p.a.	Benchmark

## Investment Performance

The investment performance of the Pension Fund and the fund managers is regularly reviewed by Committee members. Performance reports to compare actual performance against the targets set for the fund managers are provided to and discussed by the Committee quarterly.

The overall Pension Fund performance is summarised in the table below. All figures shown are annualised performance figures over the various periods to 31<sup>st</sup> March 2016.

	1 year	3 years	5 years
Overall Pension Fund performance	16.10	11.84	9.47
Benchmark	16.85	12.33	9.92
<b>Performance versus benchmark</b>	(0.75)	(0.49)	(0.45)

Individual fund manager performance against the benchmarks during 2014/15 is shown in the table below. The returns for CQS and Allianz are part year only. The mandates that were in place for the full year all produced strong absolute returns. Private equity valuations are estimated and lag the changes in public equity markets, which results in underperformance when listed equities (the benchmark) rise strongly but out-perform in subsequent years when valuation movements catch up with listed markets.

Fund Manager	Mandate	Annual actual return %	Annual benchmark return %	Annual (Under)/Over Performance %
BlackRock Investment Mgt	Passive Equities & Bonds	17.42	17.32	0.10
Legal & General Investment Mgt	Passive Equities & Bonds	16.28	17.00	(0.72)
CBRE Global Investors	Property	13.74	16.69	(2.95)
Pantheon	Private Equity	14.90	23.80	(8.90)
CQS	Multi Sector Credit	2.31	1.51	0.80
Allianz	Infrastructure Debt	1.78	1.35	0.43
<b>Total Fund Performance</b>		<b>16.10</b>	<b>16.85</b>	<b>(0.75)</b>

**Market Developments 2015-16**

On 16 December 2015 the US Federal Reserve finally raised its main interest rate (the Federal Funds rate) by 0.25% from the level set in December 2008. However, just as when the US Federal Reserve ended Quantitative Easing in October 2014 this did not signal a large scale scaling back of the ultra loose monetary policy and interventionist approach of the major Central Banks. The US Federal Reserve made no further adjustments to interest rates in the 2015-16 financial year and the Minutes of the Federal Open Markets Committee held on 15 and 16 March 2016 recorded that the committee expected *“only gradual increases in the federal funds rate.”* As in the previous financial year the European Central Bank and Bank of Japan both expanded their already radical policies of monetary easing. Another “Greek crisis” came and went during June, July and August 2015. Economic (GDP) growth faltered globally. Low inflation and concerns about deflation continued. The 2015-16 financial year was, in clear contrast to 2014-15, a year of overall weakening in Listed Equity prices with both particular issues in Chinese equity markets and a significant reduction in crude oil prices and generally weak commodity prices weighing negatively on markets overall. In contrast Benchmark Government Bonds (Germany, Japan, UK, US) further strengthened.

Anticipation of a rise in US interest rates was a feature of much of the year. The minutes of the meeting of the Federal Reserve’s interest rate setting Committee, the Federal Open Markets Committee (FOMC) for June, July, September and October 2015 all acknowledged a further moderate expansion in economic activity but stated that achievement of the Federal Reserve’s statutory mandate to foster maximum employment and price stability did not yet warrant an increase in interest rates (the Federal Funds rate). Finally, on 16 December 2015 the Federal Reserve raised interest rates with the minutes of the FOMC stating *“The Committee judges that there has been considerable improvement in labour market conditions this year, and it is reasonably confident that inflation will rise, over the medium term, to its 2 percent objective. Given the economic outlook, and recognizing the time it takes for policy actions to affect future economic outcomes, the Committee decided to raise the target range for the federal funds rate to ¼ to ½ percent. The stance of monetary policy remains accommodative after this increase, thereby supporting further improvement in labour market conditions and a return to 2 percent inflation.”* The US experienced generally positive economic activity (during the year unemployment fell further from 5.5% to 5%) and domestic market data. The S & P 500 reached an all time high of 2130 on 21 May 2015. US equities were then buffeted by a range of factors. These included concerns about future economic growth, the “Greek crisis” of mid 2015, the equity market sell-off/economic issues in China of August and September 2015 and then again in January 2016 and falling oil and other commodity prices. Despite a strong rally in March 2016 the S & P 500 closed on 31 March 2016 at 2060 very slightly below its closing figure of a year earlier.

In the United Kingdom economic growth fell and inflation remained low with unemployment, however, falling over the year from 5.5% to 5.1%. The Bank of England maintained accommodative monetary policy with the Base Rate remaining at 0.5%. The FTSE All Share index fell over 7% during 2015-16.

The new financial year began with another “Greek crisis” looming. Talks on a new bailout between the Greek Government and the “troika” of the European Central Bank, European Union and International Monetary Fund broke down in late June with Greek Prime Minister Alexis Tsipras calling a referendum on the extension to the bailout proposed by Greece’s creditors. The Greek Government imposed controls of 60 Euros a day on withdrawals from personal bank accounts. On 30 June Greece failed to make a repayment on a loan from the IMF. On 5 July Greek voters rejected the proposed extension to the bailout. However within days the Greek government in effect capitulated to its creditors and finally in mid August a new three year bailout was agreed and approved.

In the Eurozone as a whole the unemployment rate fell to 10.2% in March 2016 down 1% from a year earlier and the lowest rate since August 2011 and overall there were clear signs of a strengthening (but limited) economic recovery with annual GDP growth at 1.7% together with positive readings across some indicators including purchasing managers indices and European Central Bank (ECB) bank lending surveys. However there were, as in 2014-15 clear concerns and a continuing potential for deflation with headline inflation at 0% as at March 2016. Continuing low levels of inflation continued to concern the ECB and in December 2015 the ECB extended its 60 billion Euro a month asset purchase programme due to end in September 2016 to March 2017 and cut its deposit rate by 0.1% to -0.3%. These measures however underwhelmed markets and were for example followed by a strengthening of the Euro (which was certainly not intended by the ECB).

Then on 10 March 2016 the ECB announced a genuinely extensive and larger than expected expansion of its already huge stimulus programme involving a further reduction to -0.4% of its deposit rate, together with decreases in its other two main interest rates, an increase in the monthly asset purchase programme from 60 to 80 billion Euros a month from April 2016 together with an extension in its scope to include euro-denominated investment grade corporate bonds except those issued by banks and a further series of four longer term loan programmes to banks to incentivise bank lending. In his statement on 10 March 2016 Mario Draghi the ECB President however stated that *“to reap the full benefits of our monetary policy measures other policy areas must contribute decisively”* and he called upon Governments to implement effective structural policies particularly *“actions to raise productivity and improve the business environment, including the provision of an adequate public infrastructure.”* Despite, however, all the accommodative monetary policy of the ECB during 2015-16 European equities retreated during the year.

Notwithstanding the huge monetary stimulus and attempts at structural reform undertaken in Japan since 2013 following the introduction of “Abenomics” the Japanese economy exhibited declining growth and low inflation expectations. This resulted in yet further monetary easing with Japan introducing a negative interest rate policy in January 2016. In essence the economic theory is that negative rates encourage savers to spend more freely and banks to lend rather than hold deposits, although there is a counter argument that this limits banks’ ability to lend profitably.



Both Chinese Equity markets and the economy experienced a difficult time during 2015-16. The Chinese authorities introduced a wide range of measures to seek to stabilise share prices in July 2015 (including banning large shareholders from selling for six months) but these failed and in August the Peoples Bank of China devalued the renminbi for three days in a row. Growing evidence of a Chinese economic slowdown, as exemplified by lacklustre manufacturing data, added to the issues and in October the Central Bank cut interest rates and bank deposit requirements. After a period of relative quiet the Chinese Government poorly communicated adjustments to the renminbi in December 2015 and Chinese Equity markets plunged again in January 2016. Despite ongoing evidence of economic slowdown Chinese shares rallied in March 2016 as the Chinese authorities indicated further potential economic stimulus.

In contrast to spectacular 2014-15 gains the Indian Sensex Equity index fell during 2015-16 reflecting, in addition to concerns about a global slowdown and other external factors, diminished expectations over the pace of Prime Minister Narendra Modi's economic reforms.

Equity markets had, overall, a negative 2015-16 with Asian (ex Japan) and emerging markets generally performing more negatively than Developed markets. Concerns about global growth adversely affected equities in general. Falls in Chinese equities had some "contagion" effect while lower oil and commodity prices had a generally negative effect particularly in Emerging markets which also suffered from currency weaknesses. An unusual correlation between equity markets and the price of oil seemed to appear with equities appearing to move in response to oil prices. One plausible factor contributing to this is that both are reacting to a common factor, namely, a softening of global aggregate demand.

An environment of limited GDP growth, low inflation (exasperated by weak oil and other commodity prices), geopolitical uncertainty and continued ultra loose monetary policy by the major central banks supported Benchmark Government Bonds. The Japanese 10 year benchmark yield went negative reducing from 0.41 to -0.05. The German 10 year benchmark reduced from 0.18 at the start of the financial year to 0.15 on 31 March 2016 while that of the UK reduced from 1.70 to 1.54 and that of the US from 1.94 to 1.8.

The policies of Central Banks continue to distort free functioning markets, notably fixed income. This has resultant and potentially pronounced effects for measuring the liabilities of Defined Benefit Pension Schemes where these are in any way linked to Benchmark Government Bond yields.

**John Raisin Financial Services Limited**  
**Independent Advisor**  
**15 July 2016**

## **Scheme Administration Report**

Local Government Pension Scheme

Administration Service Delivery

Communications Policy

Pensions Administration Strategy

## **Local Government Pension Scheme**

The Haringey Pension Fund is part of the Local Government Pension Scheme (LGPS), which is a statutory scheme with defined benefits based on membership and final pay and guaranteed by law. The benefits are set out in the Local Government Pension Scheme (Benefits, Membership and Contributions) Regulations 2013 and Local Government Pension Scheme (Transitional, Provision Savings and Amendment) Regulations 2014. Haringey Pension Fund cannot make changes to the scheme, and may only exercise such discretions as are prescribed by the LGPS regulations.

Membership is open to the non-teaching employees of the Administering Authority, all scheduled bodies and certain admitted bodies until the day before age 75. From April 2014, the benefit structure changed from a final salary scheme to career average revalued earnings based scheme, with changes to the accrual rate and to align the normal retirement date with the age at which the state pension commences.

### **Administration Service Delivery**

The Haringey Council Pension Service is composed of two distinct arms: Fund Management and Pension Administration. Pension Administration is part of Human Resources.

The Pension Administration service is included in the HR business plan which makes links to the Council's aims and objectives. The Pensions team calculates and pays pension benefits, maintains a database of members and is responsible for the interpretation and implementation of the Local Government Pension Scheme regulations and related legislation.

The service operates in accordance with their professional standards and within the regulations laid down by the Local Government Pension Scheme.

### Internal Dispute Resolution Procedure

Members of pension schemes have statutory rights to ensure that complaints, queries and problems concerning pension rights are properly resolved.

To facilitate this process, an Internal Disputes Resolution Procedure has been established. In the first instance, members are expected to take up matters with the Pensions Manager, Janet Richards at the following address: Level 9, Alexandra House, 10 Station Road, Wood Green, London, N22 7LR or [janet.richards@haringey.gov.uk](mailto:janet.richards@haringey.gov.uk). If the matter remains unresolved, a stage 1 appeal may be made to the Head of Human Resources and thereafter, if necessary a further appeal may be made to Bernie Ryan, Associate Director, Corporate Governance Team at Level 5, River Park House, 225 High Road, Wood Green, London, N22 8HQ or [bernie.ryan@haringey.gov.uk](mailto:bernie.ryan@haringey.gov.uk).

If the problem remains unresolved, members then have the facility to refer the matter to The Pensions Advisory Service (TPAS) which has a network of pension advisers who will try to resolve problems before they are referred on

to the Pensions Ombudsman. However, the TPAS service may be invoked at any stage of the appeal process. Both TPAS and the Pensions Ombudsman can be contacted at:

11 Belgrave Road  
London  
SW1V 1RB

The statutory body responsible for the regulation of pension schemes in the United Kingdom is The Pensions Regulator and can be contacted at the following address:

The Pensions Regulator  
Napier House  
Trafalgar Place  
Brighton  
BN1 4DW

A central tracing agency exists to help individuals keep track of deferred pension entitlements from previous employers' pension schemes. An application for a search can be submitted to:

Pension Tracing Service  
The Pension Service  
Whitley Road  
Newcastle upon Tyne  
NE98 1BA

The Haringey Pension Fund's details are registered with the tracing agency.

### Further information

For information about the Scheme generally, further information about resolving disputes, or an individual's entitlement to benefit, please refer to the Employees guide, which can be found on the council's website (details below) or contact the Pensions Team, 9<sup>th</sup> Floor, Alexandra House, 10 Station Road, Wood Green, N22 7TR / telephone 020 8489 5916 or refer to the Council's website: [www.haringey.gov.uk/pensionfund](http://www.haringey.gov.uk/pensionfund)

## **Communications Policy**

Effective communication between the Administering Authority, the scheme members, and the employers within the Fund is essential to the proper management of the Local Government Pension Scheme on a transparent and accountable basis.

The current policy, which has been prepared in accordance with the LGPS regulatory requirement is attached in Appendix 3 on page 78 and sets out the policy framework within which the Pension Fund communicates with:

- Members of the scheme;
- Representatives of scheme members;
- Employing bodies; and,
- Prospective scheme members.

It identifies the format, frequency and method of distributing information and publicity. It also outlines the processes for promoting the scheme to prospective members and employing bodies.

The Communications Policy includes the provision of a pension's page on the Haringey website [www.haringeypensionfund.co.uk](http://www.haringeypensionfund.co.uk). This facility enables staff to access information about the Local Government Pension Scheme in their own home with families and partners who may also have an interest in the benefits of the scheme.

## **Pensions Administration Strategy Statement**

The Fund implemented a Pensions Administration Strategy Statement on 1<sup>st</sup> April 2011, following consultation with the employers participating in the Fund and approval by Committee.

This statement sets out the performance standards expected of the Council in its role of Administering Authority for the Fund and those expected of employers participating in the scheme. It seeks to promote good working relationships, improve efficiency and ensure quality of service and data. It sets out details of how performance will be monitored and what action might be taken in the event of persistent failure.

During the financial year 2015-16 no formal action has been taken against any employers. The only breaches of the performance standards have been minor and have been dealt with informally.

The Pensions Administration Strategy Statement can be found on the Haringey Pension Fund website  
[http://www.haringey.gov.uk/sites/haringeygovuk/files/pension\\_administration\\_strategy\\_statement.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/pension_administration_strategy_statement.pdf)

**Actuarial Funding Report**

Funding Position

Funding Strategy Statement

Statement of the Fund Actuary

## Funding Position

The Pension Fund is independently valued every three years by a firm of actuaries to assess the adequacy of the Fund's assets to meet its long term obligations.

The most recent triennial actuarial valuation of the Fund was carried out as at 31 March 2013 in a report dated 17 March 2014.

The 2013 valuation was carried out in accordance with the Fund's Funding Strategy Statement and Guidelines GN9: Funding Defined Benefits – Presentation of Actuarial Advice published by the Board for Actuarial Standards. The valuation method used was the projected unit method. The resulting contribution rates reflected the cost of providing year by year accrual of benefits for the active members and the level of funding for each employer's past service liabilities.

The market value of the Fund at the time of the last triennial valuation as at 31 March 2013 was £863m. Against this sum liabilities were identified of £1,232m equivalent to a funding deficit of £369m. The movement in the actuarial deficit between 2010 and the last valuation in 2013 is analysed below:

<b>Reason for change</b>	<b>£m</b>
Interest on deficit	(58)
Investment returns greater than expected	51
Contributions greater than cost of accrual	23
Change in demographic assumptions	(4)
Experience items	51
Change in financial assumptions	<u>(136)</u>
Total	(73)
Deficit brought forward	<u>(296)</u>
Deficit carried forward	<u><u>(369)</u></u>

The level of funding on an ongoing funding basis increased to 70.0% from 69.2% between the triennial actuarial valuations as at 31<sup>st</sup> March 2010 and as at 31<sup>st</sup> March 2013. The main reason for the deficit increase was the fall in government bond yields that increased the value placed on pension liabilities.

The funding objective of the Fund is to be fully funded. As this objective had not been achieved at the last valuation date it was agreed with the actuary that the past service deficit would be recovered over a period not exceeding 20 years. Further information about the principles for achieving full funding is set out in the Funding Strategy Statement in Appendix 4 on page 82.

Following the valuation as at 31 March 2013, the actuary agreed that the Council's contribution rate should increase by 2% over a three year period



from April 2014, from 22.9% of pensionable salaries to 24.9%. The actuary specified a minimum level of deficit contributions in monetary terms. The 2015/16 contribution rate was split between 6.8% for the past service adjustment to fund the deficit over 20 years and the future service rate of 17.1%.

The main assumptions used in the 2013 valuation were:

<b>Investments</b>	<b>Annual nominal rate of return %</b>
Discount rate	4.6
	<b>Annual change %</b>
Pay increases	4.3*
Price Increases (pension increases)	2.5

*\* Salary increased assumed to be 1% p.a. until 31<sup>st</sup> March 2016 reverting to the long term assumptions shown thereafter.*

## Funding Strategy Statement

The Local Government Pension Scheme Regulations require Local Government Pension Funds to prepare, publish and maintain a Funding Strategy Statement in accordance with guidance issued by CIPFA.

The purposes of a Funding Strategy Statement are:

- 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.

The Funding Strategy Statement is reviewed in detail every three years alongside the triennial valuation. It is reviewed in collaboration with the Pension Fund's actuary, and after consultation with the Pension Fund's employers and investment advisers. The current statement was reviewed and agreed in March 2014.

The objectives of the Funding policy set out in the Statement are:

- to ensure the long-term solvency of the Fund (and of the share of the Fund notionally allocated to individual employers);
- to ensure that sufficient funds are available to meet all benefits as they fall due for payment;
- not to restrain unnecessarily the investment strategy of the Fund so that the Administering Authority can seek to maximise investment returns (and hence minimise the cost of the benefits) for an appropriate level of risk;
- to help employers recognise and manage pension liabilities as they accrue;
- to minimise the degree of short-term change in the level of each employer's contributions where the Administering Authority considers it reasonable to do so;
- 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;
- to address the different characteristics of the disparate employers or groups of employers to the extent that this is practical and cost-effective; and
- to maintain the affordability of the Fund to employers as far as is reasonable over the longer term.

The policy is shown in full in Appendix 4 on page 82.

## Pension Funds Accounts Reporting Requirement

### Introduction

CIPFA's Code of Practice on Local Authority Accounting 2015/16 requires Administering Authorities of LGPS funds that prepare pension fund accounts to disclose what IAS26 refers to as the actuarial present value of promised retirement benefits.

The actuarial present value of promised retirement benefits is to be calculated similarly to the defined benefit obligation under IAS19. There are three options for its disclosure in pension fund accounts:

- showing the figure in the Net Assets Statement, in which case it requires the statement to disclose the resulting surplus or deficit;
- as a note to the accounts; or
- by reference to this information in an accompanying actuarial report.

If an actuarial valuation has not been prepared at the date of the financial statements, IAS26 requires the most recent valuation to be used as a base and the date of the valuation disclosed. The valuation should be carried out using assumptions in line with IAS19 and not the Pension Fund's funding assumptions.

I have been instructed by the Administering Authority to provide the necessary information for the London Borough of Haringey Pension Fund, which is in the remainder of this note.

### Present value of Promised Retirement Benefits

Present value of Promised Retirement Benefits (£m)	Year ended	
	31 March 2016	31 March 2015
Active members	719	734
Deferred pensioners	371	419
Pensioners	501	555
<b>Total</b>	<b>1,590</b>	<b>1,708</b>

Liabilities have been projected using a roll forward approximation from the latest formal funding valuation as at 31 March 2013. The approximation involved in the roll forward model means that the split of scheme liabilities between the three classes of member may not be reliable. However, I am satisfied the aggregate liability is a reasonable estimate of the actuarial present value of benefit promises. I have not made any allowance for unfunded benefits.

The above figures include both vested and non-vested benefits, although the latter is assumed to have a negligible value.

It should be noted the above figures are appropriate for the Administering Authority only for preparation of the accounts of the Pension Fund. They should not be used for any other purpose (i.e. comparing against liability measures on a funding basis or a cessation basis).

### Assumptions

The assumptions used are those adopted for the Administering Authority's IAS19 report as required by the Code of Practice. These are given below. I estimate that the impact of the change of assumptions to 31 March 2016 is to decrease the actuarial present value by £158m.

## LONDON BOROUGH OF HARINGEY PENSION FUND

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HYMANS ROBERTSON LLP

**Financial assumptions**

My recommended financial assumptions are summarised below:

Year ended	31 March 2016 % p.a.	31 March 2015 % p.a.
Inflation/pensions increase rate	2.2%	2.4%
Salary increase rate	4.2%	4.3%
Discount rate	3.5%	3.2%

**Longevity assumptions**

As discussed in the accompanying report, the life expectancy assumption is 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 long term rate of 1.25% p.a.. Based on these assumptions, the average future life expectancies at age 65 are summarised below:

Average future life expectancies at age 65 (years)	Males	Females
Current pensioners	21.9	24.1
Future pensioners*	24.2	26.5

\* Future pensioners are assumed to be aged 45 at the most recent formal valuation as at 31 March 2013.

Please note that the assumptions are identical to last year's IAS26 disclosure for the Fund.

**Commutation assumption**

An allowance is included for future retirements to elect to take 50% of the maximum additional tax-free cash up to HMRC limits for pre-April 2008 service and 75% of the maximum tax-free cash for post-April 2008 service.

**Sensitivity Analysis**

CIPFA guidance requires the disclosure of the sensitivity of the results to the methods and assumptions used. The sensitivities regarding the principal assumptions used to measure the liabilities are set out below:

Change in assumptions for the year ended 31 March 2016	Approximate % increase to liabilities	Approximate monetary amount (£m)
0.5% decrease in discount rate	11%	167
1 year increase in member life expectancy	3%	48
0.5% increase in salary increase rate	3%	48
0.5% increase in pensions increase rate	7%	117

**Professional notes**

This paper accompanies my covering report titled 'Actuarial Valuation as at 31 March 2016 for accounting purposes'. The covering report identifies the appropriate reliances and limitations for the use of the figures in this paper, together with further details regarding the professional requirements and assumptions.

Prepared by:-



Douglas Green FFA

14 April 2016

## **Financial Report**

Chief Financial Officer's Responsibilities

Statement of the Chief Financial Officer

Basis of Preparation & Accounting Policies

Fund Account

Net Asset Statement

Note to the Financial Statements

Annex 1 to the Financial Statements

Auditor's Report

## **Chief Financial Officer's Responsibilities**

The financial statements are the responsibility of the Chief Financial Officer. Pension scheme regulations require that audited financial statements for each Scheme year are made available to Scheme members, beneficiaries and certain other parties, which:

“show a true and fair view of the financial transactions of the Scheme during the Scheme year and of the amount and disposition at the end of that year of the assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Scheme year, in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom”.

The Chief Financial Officer has supervised the preparation of the financial statements and has, agreed suitable accounting policies, to be applied consistently, making any estimates and judgments on a prudent and reasonable basis.

The Chief Financial Officer is also responsible for making available certain other information about the Scheme in the form of an Annual Report.

The Chief Financial Officer is responsible for ensuring that records are kept in respect of contributions received in respect of any active member of the Scheme and for monitoring whether contributions are made to the Scheme by the Administering Authority and other participating bodies by the due dates.

The Chief Financial Officer is responsible for the maintenance and integrity of the financial information of the Scheme included on the Authority's website. Legislation in the United Kingdom governing the preparation and dissemination of the financial statements may differ from legislation in other jurisdictions.

The Chief Financial Officer also has a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to them to safeguard the assets of the Scheme and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

### **Statement of the Chief Financial Officer**

I certify that the financial statements set out in pages 33 to 53 have been prepared in accordance with the accounting policies set out below and give a true and fair view of the financial position of the Pension Fund at the reporting date and of its expenditure and income for the year ended 31<sup>st</sup> March 2016.

**Tracie Evans, CPFA**  
**Chief Operating Officer / Chief Financial Officer**

**30 September 2016**

## **Basis of Preparation**

The financial statements have been prepared in accordance with the Public Service Pensions Act 2013 (as amended) and Local Government Pension Scheme Regulations and with the guidelines set out in the *Code of Practice on Local Authority Accounting in the UK 2015/16*, which is based on International Financial Reporting Standards as amended for the UK public sector. 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 (as amended).

### **Accounting Policies and Principles**

#### Contributions

Employer and employee contributions are included on an accruals basis relating to wages and salaries payable for the financial year. Employers' capital cost payments are also accounted for on an accruals basis relating to the period in which the liability arises.

#### Benefits

Benefits are shown on an accruals basis relating to the date on which they become payable. The benefits payable in respect of service from 1st April 2014 are based on career average revalued earnings and the number of years of eligible service. Pensions are increased each year in line with the Consumer Price Index.

#### Transfers in and out

Transfers in and out are accounted for on a cash basis whenever the transfer value is paid or received.

#### Administrative expenses

Administrative expenses are shown on an accruals basis. A proportion of relevant Council officers' time, including related on-costs, has been charged to the Fund on the basis of actual time spent on scheme administration, governance and investment related matters. Charges paid to HMRC in respect of scheme members breaching the Pensions Lifetime allowance are disclosed under administrative expenses.

#### Investment income

Interest on cash and short term deposits is accounted for on an accruals basis. Distributions from equity and bond pooled funds are recognised on the date of payment. Distributions from property unit trusts are shown on an accruals basis by reference to the ex-dividend date.

Income from pooled investment vehicles is normally retained within the vehicle and included within change in market value of investments.

#### Taxation

The Fund is exempt from UK income tax on interest received and 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 an expense as it arises.

### Investment management expenses

Fund managers' fees are based on the market values of the portfolios under management, or in the case of private equity, the value committed to funds. Fees are either charged directly to the Fund or deducted from the value of pooled holdings, in the case of the latter an estimate of the fees is allocated to investment expenses from the change in the value of investments. All the Investment Management expenses are shown on an accruals basis. There is a provision for performance related fees for private equity, although none were charged in the year.

### Financial Assets & Liabilities

Financial assets and liabilities are included in the net assets statement on a fair value basis as at the reporting date. A financial asset or liability is recognised in the net assets statement on the date the fund become party to the contractual acquisition of the asset or party to the liability. From this date any gains or losses from changes in the fair value of the asset or liability are recognised by the fund.

### Investments – valuation

Investments are stated at fair value on the final working day of the financial year as follows:

- Listed securities are stated at bid value;
- Unquoted securities are stated at the estimate of fair value provided by the investment manager;
- Units in managed funds and pooled investment vehicles are stated at bid value; and
- Property held in pooled investment vehicles is valued by each fund in accordance with local market practice, for UK property this is The Royal Institute of Chartered Surveyor's Valuation Standards.

There are no published price quotations available to determine the fair value of the Fund's private equity holdings. The value of these holdings is 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 adjusted for drawdowns paid and distributions received in the period from the date of the private equity financial statements to 31 March 2016.

The valuation of foreign equities is calculated by using the overseas bid price current at the relevant date and the exchange rate for the appropriate currency at the time to express the value as a sterling equivalent.

### Cash and Cash Equivalents

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours.

Cash equivalents are investments that mature in no more than a three month period from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value.

### Actuarial Present Value of Promised Retirement Benefits

The actuarial present value of promised retirement benefits is assessed on a triennial basis by the scheme actuary and a roll forward approximation is applied in the intervening years. This is done in accordance with the requirements of IAS19 and relevant actuarial standards. As permitted under IAS26, the Fund has opted to



disclose the actuarial present value of promised retirement benefits as an annex to the financial statements.

Additional Voluntary Contributions (“AVCs”)

Members of the Fund are able to make AVCs in addition to their normal contributions. The related assets are invested separately from the main fund, and in accordance with the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009, are not accounted for within the financial statements. If on retirement members opt to enhance their Scheme benefits using their AVC funds, the amounts returned to the Scheme by the AVC providers are disclosed within transfers-in.

Further details about the AVC arrangements are disclosed in note 17 to the financial statements.

**Critical Judgements Applied**

There are two areas in the accounts where subjective judgements are applied which are materially significant to the accounts:

Actuarial present value of promised retirement benefits – the figure of net liability to pay pensions is based on a significant number of assumptions including the discount rate, mortality rates and expected returns on fund assets. The Pension Fund’s qualified actuary calculates this figure to ensure the risk of misstatement is minimised. The liability is calculated on a three yearly basis with annual updates in the intervening years. The Actuary has advised that this has provided a reasonable estimate of the actuarial present value of promised retirement benefits.

Private Equity valuations – the value of the Fund’s private equity holdings is calculated by the General Partner of the fund using valuations provided by the underlying partnerships. The variety of valuation bases adopted and quality of management data of the underlying investments in the Partnership means that there are inherent difficulties in determining the value of these investments. Given the long term nature of the investments, amounts realised on the sale of these investments may differ from the values reflected in these financial statements and the difference may be material.

2015/16	Pension Fund Account	Note	2014/15
£000			£000
	<b>Dealings with members, employers and others directly involved in the fund</b>		
43,851	Contributions	1	42,518
1,741	Transfers in from other pension funds	2	3,058
<u>45,592</u>			<u>45,576</u>
(44,321)	Benefits	3	(43,060)
(3,790)	Payments to and on account of leavers	4	(3,722)
<u>(48,111)</u>			<u>(46,782)</u>
<b>(2,519)</b>	<b>Net dealings with those involved in the fund</b>		<b>(1,206)</b>
(4,415)	Management expenses	5	(3,236)
	<b>Returns on Investments:</b>		
4,675	Investment Income	6	4,322
(25)	Taxes on income		(112)
3,206	Profit and losses on disposal of investments and changes in market value of investments	7	146,243
<u>7,856</u>	<b>Net return on investments</b>		<u>150,453</u>
922	<b>Net (increase) / decrease in the net assets available for benefits during the year</b>		<b>146,011</b>
<u>1,045,355</u>	<b>Opening net assets of the scheme</b>		<u>899,344</u>
<u>1,046,277</u>	<b>Closing net assets of the scheme</b>		<u>1,045,355</u>

**Net Asset Statement**

The Net Asset Statement sets out the assets and liabilities for the Fund as at 31 March 2016. The Fund is separately managed by the Council acting in its role as Administering Authority and its accounts are separate from the Council's.

31/03/16	Net Asset Statement	Note	31/03/15
£000			£000
1,024,883	Investment assets	7	1,032,791
20,694	Cash deposits	7	13,150
<u>1,045,577</u>			<u>1,045,941</u>
2,290	Current assets	10	727
(1,590)	Current liabilities	11	(1,313)
<u>1,046,277</u>	<b>Net assets of the fund available to fund benefits at the period end</b>		<u>1,045,355</u>

## Notes to Pension Fund Account

### 1. Contributions Receivable

<u>2015/16</u>		<u>2014/15</u>
£000		£000
9,122	Employee contributions	8,938
	Employer contributions	
24,224	- Normal contributions	23,842
9,014	- Deficit recovery contributions	8,137
1,491	- Augmentation contributions	1,601
<u>34,729</u>	Total employers' contributions	<u>33,580</u>
<b><u>43,851</u></b>	<b>Total</b>	<b><u>42,518</u></b>

Employers' deficit funding contributions include lump sum payments and the deficit element of the employers' contribution rate. In addition, payments resulting from cessation valuations are also included.

Employers' other contributions relate to capital cost payments and cover the cost to the Fund of members awarded early retirement before age 60 or otherwise after age 60, but before their normal protected retirement date.

Contributions are further analysed in the following note:

#### 1a. Analysis of Contributions Receivable

<u>2015/16</u>		<u>2014/15</u>
£000	<b>By authority</b>	£000
32,249	- Administering authority	31,094
9,705	- Scheduled bodies	9,679
1,897	- Admitted bodies	1,745
<b><u>43,851</u></b>	<b>Total</b>	<b><u>42,518</u></b>

Haringey Council is the administering authority. Scheduled bodies are public bodies required by law to participate in the LGPS. Admitted bodies are in the LGPS either because services have been outsourced or because they have sufficient links with the Council to be regarded as having a community interest.

**2. Transfers In**

<b>2015/16</b>		<b>2014/15</b>
<b>£'000</b>		<b>£'000</b>
1,741	Individual transfers in from other schemes	3,058
<u>1,741</u>	<b>Total</b>	<u>2,435</u>

**3. Benefits Payable**

<b>2015/16</b>		<b>2014/15</b>
£000	<b>By category</b>	£000
36,387	- Pensions	34,842
7,107	- Commutation and lump sum retirement benefits	7,107
827	- Lump sum death benefits	1,111
<u>44,321</u>	<b>Total</b>	<u>43,060</u>

Benefits payable are further analysed in the following note.

**3a. Analysis of Benefits Payable**

<b>2015/16</b>		<b>2014/15</b>
<b>£'000</b>		<b>£'000</b>
39,585	Administering authority	40,183
3,480	Scheduled bodies	2,582
1,256	Admitted bodies	295
<u>44,321</u>	<b>Total</b>	<u>43,060</u>

**4. Payments to and on account of leavers**

<b>2015/16</b>		<b>2014/15</b>
<b>£'000</b>		<b>£'000</b>
73	Refunds of contributions	36
3,717	Individual transfers out to other schemes	3,686
<u>3,790</u>	<b>Total</b>	<u>3,722</u>

**5. Management Expenses**

<b>2015/16</b>		<b>2014/15</b>
<b>£'000</b>		<b>£'000</b>
722	Administration costs	686
3,325	Investment Management expenses	2,413
368	Oversight & governance costs	137
<b>4,415</b>	<b>Total</b>	<b>3,236</b>

Included within oversight and governance costs are audit fees of £21,000 paid to BDO LLP (2014-15: £21,000 paid to Grant Thornton UK LLP). Administration costs include £571,000 (2014-15: £561,000) charged by the Council in respect of the use of Council staff by the Fund.

Investment management fees are based on a percentage of the assets managed or committed. There were no performance related fees in the year. Transaction costs are disclosed in note 7.

**6. Investment Income**

<b>2015/16</b>		<b>2014/15</b>
£000		£000
4,654	Pooled investments - unit trusts and other managed funds	3,899
21	Interest on cash deposits	423
<b>4,675</b>	<b>Total</b>	<b>4,322</b>

## 7. Reconciliation of movements in Investment assets &amp; liabilities

2015/16	Market Value at 1st April 2015	Purchases & derivative payments	Sales & derivative receipts	Changes in market value	Market Value at 31st March 2016
	£000	£000	£000	£000	£000
Pooled investment vehicles	1,032,723	57,541	(69,269)	1,305	1,022,300
Cash deposits	13,150	14,786	(9,145)	1,903	20,694
Other investment assets	68	3,872	(1,355)	(2)	2,583
<b>Total</b>	<b>1,045,941</b>	<b>76,199</b>	<b>(79,769)</b>	<b>3,206</b>	<b>1,045,577</b>

2014-15	Market Value as at 1 April 2014	Purchases & Derivative payments	Sales & derivative receipts	Changes in market value	Market Value as at 31 March 2015
	£'000	£'000	£'000	£'000	£'000
Pooled Investment vehicles	888,404	91,863	(93,874)	146,330	1,032,723
Cash Deposits	5,282	11,291	(3,337)	(86)	13,150
Other Investment assets	72	52	(55)	(1)	68
Other investment liabilities	(12,606)	12,606	0	0	0
<b>Net Investment Assets</b>	<b>881,152</b>	<b>115,812</b>	<b>(97,266)</b>	<b>146,243</b>	<b>1,045,941</b>

The changes in market value during the year comprise all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year.

Transaction costs are included in the cost of purchases and sales proceeds. Transaction costs include costs charged directly to the Fund such as fees, commissions, stamp duty and other fees.

**7a. Analysis of investment assets excluding derivatives and other investment balances**

31/03/2016	By category	31/03/2015
£000		£000
	<b>Pooled Investment Vehicles</b>	
103,149	Unit Trusts: - Property - UK	94,058
310,647	Unitised Insurance Policies - UK	315,264
499,971	Unitised Insurance Policies - Overseas	520,901
420	Other managed funds - Property - Overseas	54
21,611	Other managed funds - Other - UK	17,328
89,085	Other managed funds - Other - Overseas	85,186
<b>1,024,883</b>		<b>1,032,791</b>
	<b>Cash Deposits</b>	
19,393	Sterling	9,657
1,301	Foreign Currency	3,493
<b>20,694</b>		<b>13,150</b>
<b>1,045,577</b>	<b>Total Investments</b>	<b>1,045,941</b>

The managed funds in which the Scheme has invested are all operated or managed by companies registered in the United Kingdom.

**7b. Derivative Contracts**

The Pension Fund did not hold any derivative contracts as at 31 March 2016 or 31 March 2015.



**7e. Analysis of Investments by fund manager**

31/03/2016		By fund manager	31/03/2015	
£000	%		£000	%
0	0.0	BlackRock	546,809	52.3
9	0.0	Capital International	15	0.0
810,619	77.5	Legal and General	289,641	27.7
111,024	10.6	CBRE Global Investors	96,579	9.2
21,621	2.1	Allianz Global Investors	20,357	1.9
46,529	4.5	CQS	45,750	4.4
44,110	4.2	Pantheon	42,868	4.1
11,665	1.1	In house cash deposits	3,922	0.4
<b>1,045,577</b>	<b>100.0</b>	<b>Total</b>	<b>1,045,941</b>	<b>100.0</b>

**7f. Investments exceeding 5% of Net Assets**

31/03/2016		Name of holding	31/03/2015	
£000	%		£000	%
0	0.0	BlackRock Aquila Life UK Equity Index Fund	142,686	13.7
0	0.0	BlackRock Aquila Life US Equity Index Fund	213,629	20.5
0	0.0	BlackRock Aquila Life Over 5 Years Index Linked	119,135	11.4
102,915	9.8	Legal & General World Emerging Equity Index	103,138	9.9
160,204	15.3	Legal & General UK Equities Index	0	0.0
240,793	23.0	Legal & General North American Equities	0	0.0
79,217	7.6	Legal & General European (ex UK) Equities	0	0.0
150,733	14.4	Legal & General Index Linked Gilts	0	0.0

**8a. Classification of Financial Instruments**

The majority of the Fund's financial assets and liabilities are classified as "fair value through profit and loss". This means that the assets can be exchanged between parties at a market price. The Accounting Policies describe how fair value is measured. Assets which have fixed payments and are not quoted in an active market are classified as "Loans and Receivables". The only financial assets in this class held by the Fund are cash deposits and debtors. Creditors to the Fund are classified as

financial liabilities at amortised cost because they are not held for trading. No assets or liabilities have been reclassified.

31/03/2016			31/03/2015	
Carrying Value	Fair Value	Name of holding	Carrying Value	Fair Value
£000	£000		£000	£000
		<b>Financial assets at fair value through profit or loss</b>		
1,022,302	1,022,302	- Pooled investment vehicles	1,032,723	1,032,723
2,581	2,581	- Other investment balances	68	68
<b>1,024,883</b>	<b>1,024,883</b>		<b>1,032,791</b>	<b>1,032,791</b>
		<b>Loans and receivables</b>		
20,694	20,694	- Cash deposits	13,150	13,150
2,290	2,290	- Debtors	727	727
<b>22,984</b>	<b>22,984</b>		<b>13,877</b>	<b>13,877</b>
		<b>Financial liabilities at amortised cost</b>		
(1,467)	(1,467)	- Creditors	(1,129)	(1,129)
(123)	(123)	- Cash overdrawn	(184)	(184)
<b>(1,590)</b>	<b>(1,590)</b>		<b>(1,313)</b>	<b>(1,313)</b>
<b>1,046,277</b>	<b>1,046,277</b>	<b>Net Assets</b>	<b>1,045,355</b>	<b>1,045,355</b>

#### 8b. Net gains and losses on financial instruments

The table below analyses gains and losses according to financial instrument classification.

31/03/2016		31/03/2015
£000		£000
	<b>Financial Assets</b>	
1,305	Fair value through profit or loss	146,330
1,901	Loans and receivables	(87)
<b>3,206</b>		<b>146,243</b>
	<b>Financial Liabilities</b>	
0	Fair value through profit or loss	0
0	Financial liabilities at amortised cost	0
<b>0</b>		<b>0</b>

**8c. Valuation of Financial Instruments Carried at Fair Value**

In accordance with IFRS 7 Financial Instruments, the valuation of financial instruments has been classified into three levels according to the quality and reliability of information used to determine fair values. Criteria utilised in the instrument classifications are detailed below.

**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. Products classified as level 1 comprise quoted equities, quoted fixed securities, quoted index linked securities, cash and short term investment debtors and creditors and pooled funds whose value is derived wholly in such investments.

**Level 2**

Financial instruments at level 2 are those where quoted market prices are not available; for example, where an investment 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. Property is treated as level 2.

**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 (private equity and infrastructure), and hedge fund of funds, which are valued using various valuation techniques that require significant judgement in determining appropriate assumptions.

The following table provides an analysis of the financial assets of the pension fund grouped into levels 1 to 3, based on the level at which the fair value is observable.

	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Financial assets:</b>				
- At FV through Profit and Loss	0	908,046	114,256	<b>1,022,302</b>
- Loans and receivables	2,581	0	0	<b>2,581</b>
<b>Net financial assets at 31st March 2016</b>	<b>2,581</b>	<b>908,046</b>	<b>114,256</b>	<b>1,024,883</b>
	Level 1	Level 2	Level 3	Total
	£000	£000	£000	£000
Financial assets:				
- At FV through Profit and Loss	881,982	94,112	56,697	1,032,791
Loans and receivables	13,877	0	0	13,877
Net financial assets at 31st March 2015	895,859	94,112	56,697	1,046,668

## 9. Nature and extent of risks arising from Financial Instruments

The Pension Fund's investment objective is to achieve a return on Fund assets, which is sufficient, over the long term, to fully meet the cost of benefits and to ensure stability of employer's contribution rates. Achieving the investment objectives requires a high allocation to growth assets in order to improve the funding level without increasing contribution rates, although this leads to a potential higher volatility of future funding levels and contribution rates.

### a) Management of risk

The Pension Fund is invested in a range of different types of asset – equities, bonds, property, private equity and cash. This is done in line with the Local Government Pension Scheme (Management & 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 SIP which sets out the Fund's approach to investment including the management of risk. The latest version is attached to the Pension Fund Annual Report and Accounts.

The majority of the Pension Fund's assets are managed by external fund managers and they are required to provide an audited internal controls report regularly to the Council which sets out how they ensure the Fund's assets are safeguarded against loss and misstatement.

The listed equity and index linked portfolios, representing 75% of the fund's strategy, are managed on a passive basis to minimise the volatility of returns compared with market indices and to reduce the fees and governance requirements.

### b) Market price risk

The key risk for the Pension Fund is market risk, which is the risk that the values of the investments fluctuate due to changes in market prices. The majority of the Fund is invested in pooled funds with underlying assets which can fluctuate on a daily basis as market prices change e.g. equities and bonds. To demonstrate the impact of this volatility, the table below shows the impact of potential price changes based on the observed historical volatility of asset class returns. The potential volatilities are consistent with a one standard deviation movement in the change in value of the assets over the last three years. The value for total assets adjusts for correlations across asset classes and therefore the value of increase / decrease for the asset classes will not sum to the total asset figure.

<b>As at 31/03/2016</b>	<b>Value</b>	<b>% change</b>	<b>Value on increase</b>	<b>Value on decrease</b>
	£000	%	£000	£000
UK equities	159,980	10.3	176,458	143,502
Overseas equities	499,971	9.3	546,468	453,474
UK bonds	197,196	9.1	215,141	179,251
Cash	20,496	0.0	20,496	20,496
Property	100,989	2.7	103,716	98,262
Alternatives	66,945	6.5	71,296	62,594
<b>Total Assets</b>	<b>1,045,577</b>		<b>1,133,575</b>	<b>957,579</b>

As at 31/03/2015	Value	% change	Value on increase	Value on decrease
	£000	%	£000	£000
UK equities	167,209	10.3	184,365	150,054
Overseas equities	520,901	9.3	569,449	472,353
UK bonds	165,314	9.1	180,358	150,271
Cash	13,218	0.0	13,219	13,217
Property	94,113	2.7	96,644	91,581
Alternatives	85,186	6.5	90,732	79,641
<b>Total Assets</b>	<b>1,045,941</b>	<b>7.0</b>	<b>1,119,262</b>	<b>972,621</b>

A number of controls have been put in place to minimise this risk. A key method to reduce risk is to diversify the Pension Fund's investments. This is achieved through the setting of a benchmark, which incorporates a wide range of asset classes and geographical areas. Five investment managers (2014/15: six investment managers) have been appointed to further diversify the Pension Fund's investments and lower risk. In addition to diversification, parameters have been set for the investment managers to work within to ensure that the risk of volatility and deviation from the benchmark are within controlled levels.

Investment values and performance of the fund managers is measured on a quarterly basis through reporting to Pensions Committee.

Analysis of investment income accrued during the reporting period is show below.

	Uk	Non-UK	Global	Total
	£000	£000	£000	£000
Equities	5	31	0	36
Bonds			0	0
Alternatives	4,338	38	0	4,376
Cash and cash equivalents	21		0	21
Property (direct holding)			0	0
Other	236	7	0	243
<b>Total Assets</b>	<b>4,599</b>	<b>76</b>	<b>0</b>	<b>4,675</b>

### c) Exchange rate risk

The Pension Fund holds assets in currencies other than sterling, which made up 49% of the Fund value on 31<sup>st</sup> March 2016, equivalent to £509 million (2014/15: £595 million). These arise from passive pooled equities, private equity, property, multi-sector credit and cash. Foreign currency exposures are not hedged.

The main non-sterling currency exposures at 31<sup>st</sup> March 2016 were US dollars. Other major exposures were the Euro, Asian and emerging market countries and the Canadian \$.

There is a risk that due to exchange rate movements the sterling equivalent value of the investments falls. The table below is derived on a currency basket based on the Fund's currency mix. The weight of each currency is multiplied by the change in its exchange rate relative to GBP. The volatility shown for total currencies incorporates

the impact of correlations across the currencies, which dampens volatility and therefore the value of increase / decrease for the currencies will not sum to the total currency figure.

**Currency Risk (by asset class)**

<b>As at 31/03/2016</b>	<b>Value</b>	<b>% change</b>	<b>Value on increase</b>	<b>Value on decrease</b>
	£000	%	£000	£000
Overseas equities	499,971	6.0	529,969	469,973
Overseas property	420	6.0	445	395
Multi-sector credit	0	6.0	0	0
Private equity	6,904	6.0	7,318	6,490
Cash	1,301	6.0	1,379	1,223
<b>Total Assets</b>	<b>508,596</b>		<b>539,111</b>	<b>478,081</b>

<b>As at 31/03/2015</b>	<b>Value</b>	<b>% change</b>	<b>Value on increase</b>	<b>Value on decrease</b>
	£000	%	£000	£000
Overseas equities	520,901	6.0	552,321	489,481
Overseas property	54	6.0	57	51
Multi-sector credit	31,024	6.0	32,893	29,154
Private equity	39,436	6.0	41,813	37,060
Cash	3,493	6.0	3,703	3,282
<b>Total Assets</b>	<b>594,908</b>	6.0	<b>630,763</b>	<b>559,052</b>

The cash balances managed internally are only permitted to be in sterling.

**d) Interest Rate risk**

Movements in interest rates affect the income earned by the Fund and can have an impact on the value of net assets, in particular fixed income bonds. To demonstrate this risk, the table below shows the impact on income earned of a 1% increase and decrease in interest rates. For cash, the average rate earned was less than 1%, and the potential reduced income is limited to nil.

The Fund also has exposure to fixed interest bonds through the multi-sector credit and infrastructure mandates with CQS and Allianz respectively. Income earned is retained within these funds and potential changes thereto are reflected in the price risk above.

	<b>Interest earned 2015/16 £'000</b>	<b>Interest if rates 1% higher £'000</b>	<b>Interest if rates 1% lower £'000</b>
Cash Deposits	68	160	0
	<b>68</b>	<b>160</b>	<b>0</b>

	<b>Interest earned 2014/15 £'000</b>	<b>Interest if rates 1% higher £'000</b>	<b>Interest if rates 1% lower £'000</b>
Cash Deposits	454	1,362	0
	<b>454</b>	<b>1,362</b>	<b>0</b>

e) Credit risk and counterparty risk

Credit risk is the risk a counterparty fails to fulfil a transaction it has committed to entering into. This risk is particularly relevant to the Council's non-sovereign bonds (including those held in pooled funds) and cash investments.

The Investment Management Agreements the Council has signed with the external fund managers set out limits on the types of bonds the fund managers can purchase for the Fund in order to limit the possibility of default. The table below shows the split of the bond investments by credit rating at 31<sup>st</sup> March 2016 and 31<sup>st</sup> March 2015. The majority of bonds (2016: £197 million) are UK Government index linked, with the balance being corporate bonds. The UK Government has an AA+ credit rating.

	<b>Market value 31/03/2016 £000</b>	<b>AA %</b>	<b>A %</b>	<b>BBB %</b>	<b>Below BBB %</b>
Bond exposure in pooled investment vehicles	197,196	76	3	1	20
<b>Total / Weighted Average</b>	<b>197,196</b>	<b>76</b>	<b>3</b>	<b>1</b>	<b>20</b>

  

	<b>Market value 31/03/2015 £000</b>	<b>AA %</b>	<b>A %</b>	<b>BBB %</b>	<b>Below BBB %</b>
Bond exposure in pooled investment vehicles	210,364	70	3	9	18
<b>Total / Weighted Average</b>	<b>21,364</b>	<b>70</b>	<b>3</b>	<b>9</b>	<b>18</b>

The cash that the Council manages internally on behalf of the Pension Fund is invested in line with the Council's Treasury Management Strategy, which sets out very strict limits on the counterparties which can be used and the amounts that can be invested with them. The amount of cash held by fund managers is kept to a minimum and when held for a period of time is invested in the custodian bank's AAAM rated money market fund. The table below details the credit ratings of the institutions the cash was held with.

<b>31/03/2016</b>		<b>31/03/2015</b>	
<b>Exposure</b>	<b>Credit rating</b>	<b>Exposure</b>	<b>Credit rating</b>
London Borough of Haringey			

£000			£000	
9,029	AA-	Northern Trust	9,228	AA-
0	A	Barclays Bank	762	A
11,665	AAAm	Money Market Funds	3,160	AAAm
<b>20,694</b>			<b>13,150</b>	

The limits for both bonds and cash are kept under constant review to be able to respond quickly to changes in the creditworthiness of counterparties which may increase risk.

#### f) Liquidity risk

Liquidity risk is the risk that monies are not available to meet the Pension Fund's obligation to pay pension benefits on time. Maintaining a level of internally managed cash balances enables the Pension Fund to ensure liquidity is not an issue. All of the internally managed cash held on 31<sup>st</sup> March 2016 was in money market funds and bank accounts with the main bank or custodian, ensuring cash is available as required. Monitoring of the cash flow position daily assists with maintaining this position.

The majority of the Council's non cash investments are in pooled funds whose underlying holdings are listed equities or bonds. These funds have regular (at least monthly) trade dates, which ensure it is possible to realise the investments easily if necessary.

The Fund's holdings in private equity and infrastructure are expected to be realised when the underlying instruments are sold by the fund manager or reach maturity and the timing of realisation events is not within the control of the Fund. These investments represent 9.2% of total investments.

## 10. Debtors

<b>2015/16</b>		<b>2014/15</b>
£000		£000
	Debtors	
105	- Contributions due - employees	418
1,830	- Contributions due - employers	274
355	- Sundry debtors	35
<b>2,290</b>	<b>Total</b>	<b>727</b>

## 11. Creditors

<b>2015/16</b>		<b>2014/15</b>
£000		£000
(1,313)	Sundry creditors	(1,129)
(154)	Benefits payable	0
(123)	Bank overdraft	(184)
<b>(1,590)</b>	<b>Total</b>	<b>(1,313)</b>



**12. Contingent assets**

Seven admitted body employers in the Haringey Pension Fund hold insurance bonds 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.

**13. Commitments**

The Fund had the following outstanding commitments to invest at the balance sheet date:

<b>31/03/16</b>		<b>31/03/15</b>
<b>£'000</b>		<b>£'000</b>
51,800	Pantheon - Private Equity	8,452
100	CBRE - Real Estate	3,865
29,600	Allianz - Infrastructure Debt	28,093
<b>81,500</b>	<b>Total</b>	<b>40,410</b>

The commitments relate to outstanding call payments due in relation to the private equity portfolio.

**14. Related party transactions**Haringey Council

In 2015-16 the Pension Fund paid £571k to the Council for administration and legal services (2014-15: £518k). As at 31 March 2016 a £1,446k was due from the Council to the Fund (2014-15: £247k), mainly in relation to employer and employee contributions.

Governance

During 2015-16 no council members who served on the Pensions Committee were also members of the Pension Fund. Committee members are required to declare their interests at the beginning of each Committee meeting.

Key Management Personnel

Local Authorities are exempt from the key management personnel requirements of IAS24, on the basis of the disclosures required by the Accounts and Audit (England) Regulations. This also applies to the Haringey Pension Fund. The disclosures prepared in line with the Regulations can be found in the main accounts of Haringey Council. The key management person is Tracie Evans, Chief Operating Officer, who is the "Scheme Administrator".

There were no other material related party transactions.

**15. Actuarial present value of promised retirement benefits**

Annex 1 to the Financial Statements is a report from the Fund's Actuary setting out this information.

The figures included in this note are for the purpose of accounting under International Accounting Standard 19 only. It is the results of the formal funding valuation that are

used to determine the funding strategy and employer contribution rates for the Pension Fund. Details of the results of the formal funding valuation can be found in the Actuarial Position section.

## 16. Additional Voluntary Contributions ("AVCs")

Separately invested AVCs are held with the Equitable Life Assurance Society, Prudential Assurance, and Clerical Medical in a combination of With Profits, Unit Linked and Building Society accounts, securing additional benefits on a money purchase basis for those members electing to pay additional voluntary contributions.

Movements by provider are summarised below:

31/03/2016	Equitable Life Assurance Society	31/03/2015
£		£
344,177	Value as at 6 April	331,682
2,123	Contributions received	2,945
(89,391)	Retirement benefits and changes	(9,188)
(179)	Changes in market value	18,738
<b>256,730</b>	<b>Value as at 5 April</b>	<b>344,177</b>
138,298	Equitable with profits	138,639
45,572	Equitable with deposit account fund	134,469
72,860	Equitable unit linked	71,069
<b>256,730</b>	<b>Total</b>	<b>344,177</b>
2	Number of active members	5
35	Number of members with preserved benefits	37

31/03/2016	Prudential Assurance	31/03/2015
£		£
844,895	Value as at 1 April	891,664
136,436	Contributions received	125,066
(272,722)	Retirement benefits and changes	(237,091)
45,053	Changes in market value	65,256
<b>753,662</b>	<b>Value as at 31 March</b>	<b>844,895</b>
466,261	Prudential with profits cash accumulation	493,359
86,977	Prudential deposit fund	194,059
200,424	Prudential unit linked	157,477
<b>753,662</b>	<b>Total</b>	<b>844,895</b>
77	Number of active members	76
26	Number of members with preserved benefits	28

31/03/2016	Clerical and Medical	31/03/2015
£		£
40,860	Value as at 1 April	35,429
1,800	Contributions received	2,017
(632)	Changes in market value	3,414
<b>42,028</b>	<b>Value as at 31 March</b>	<b>40,860</b>

5,593	Clerical Medical with profits	5,561
36,435	Clerical Medical unit linked	35,299
<b>42,028</b>	<b>Total</b>	<b>40,860</b>
2	Number of active members	2
3	Number of members with preserved benefits	3

## 17. Post Balance Sheet Events

On 23 June 2016, the United Kingdom voted to exit the European Union. This decision has led to broad-based slump across manufacturing, services and construction and upside inflation pressure as a result of the weak currency leading to increased cost of imports. The Bank of England has also cut base rate by half to 0.25%. There may be implications for the investments held with the fund managers in the short to medium term, but the exact impact has yet to be quantified at the time of compiling these financial statements.

## Annex 1 to the Financial Statements

As referred to in note 18 to the Financial Statements, the following actuarial report has been provided by Hymans Robertson.

LONDON BOROUGH OF HARINGEY PENSION FUND  
HYMANS ROBERTSON LLP

001

## Pension Funds Accounts Reporting Requirement

### Introduction

CIPFA's Code of Practice on Local Authority Accounting 2015/16 requires Administering Authorities of LGPS funds that prepare pension fund accounts to disclose what IAS26 refers to as the actuarial present value of promised retirement benefits.

The actuarial present value of promised retirement benefits is to be calculated similarly to the defined benefit obligation under IAS19. There are three options for its disclosure in pension fund accounts:

- showing the figure in the Net Assets Statement, in which case it requires the statement to disclose the resulting surplus or deficit;
- as a note to the accounts; or
- by reference to this information in an accompanying actuarial report.

If an actuarial valuation has not been prepared at the date of the financial statements, IAS26 requires the most recent valuation to be used as a base and the date of the valuation disclosed. The valuation should be carried out using assumptions in line with IAS19 and not the Pension Fund's funding assumptions.

I have been instructed by the Administering Authority to provide the necessary information for the London Borough of Haringey Pension Fund, which is in the remainder of this note.

### Present value of Promised Retirement Benefits

Present value of Promised Retirement Benefits (£m)	Year ended	
	31 March 2016	31 March 2015
Active members	719	734
Deferred pensioners	371	419
Pensioners	501	555
<b>Total</b>	<b>1,590</b>	<b>1,708</b>

Liabilities have been projected using a roll forward approximation from the latest formal funding valuation as at 31 March 2013. The approximation involved in the roll forward model means that the split of scheme liabilities between the three classes of member may not be reliable. However, I am satisfied the aggregate liability is a reasonable estimate of the actuarial present value of benefit promises. I have not made any allowance for unfunded benefits.

The above figures include both vested and non-vested benefits, although the latter is assumed to have a negligible value.

It should be noted the above figures are appropriate for the Administering Authority only for preparation of the accounts of the Pension Fund. They should not be used for any other purpose (i.e. comparing against liability measures on a funding basis or a cessation basis).

### Assumptions

The assumptions used are those adopted for the Administering Authority's IAS19 report as required by the Code of Practice. These are given below. I estimate that the impact of the change of assumptions to 31 March 2016 is to decrease the actuarial present value by £158m.

**Financial assumptions**

My recommended financial assumptions are summarised below:

Year ended	31 March 2016 % p.a.	31 March 2015 % p.a.
Inflation/pensions increase rate	2.2%	2.4%
Salary increase rate	4.2%	4.3%
Discount rate	3.5%	3.2%

**Longevity assumptions**

As discussed in the accompanying report, the life expectancy assumption is 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 long term rate of 1.25% p.a.. Based on these assumptions, the average future life expectancies at age 65 are summarised below:

Average future life expectancies at age 65 (years)	Males	Females
Current pensioners	21.9	24.1
Future pensioners*	24.2	26.5

\* Future pensioners are assumed to be aged 45 at the most recent formal valuation as at 31 March 2013.

Please note that the assumptions are identical to last year's IAS26 disclosure for the Fund.

**Commutation assumption**

An allowance is included for future retirements to elect to take 50% of the maximum additional tax-free cash up to HMRC limits for pre-April 2008 service and 75% of the maximum tax-free cash for post-April 2008 service.

**Sensitivity Analysis**

CIPFA guidance requires the disclosure of the sensitivity of the results to the methods and assumptions used. The sensitivities regarding the principal assumptions used to measure the liabilities are set out below:

Change in assumptions for the year ended 31 March 2016	Approximate % increase to liabilities	Approximate monetary amount (£m)
0.5% decrease in discount rate	11%	167
1 year increase in member life expectancy	3%	48
0.5% increase in salary increase rate	3%	48
0.5% increase in pensions increase rate	7%	117

**Professional notes**

This paper accompanies my covering report titled 'Actuarial Valuation as at 31 March 2016 for accounting purposes'. The covering report identifies the appropriate reliances and limitations for the use of the figures in this paper, together with further details regarding the professional requirements and assumptions.

Prepared by:-



Douglas Green FFA

14 April 2016

**Independent auditor's statement to the members of the London Borough of Haringey on the pension fund financial statements included in the pension fund financial statements**

I have examined the pension fund financial statements for the year ended 31 March 2016, which comprise the Fund Account, the Net Assets Statement and the related notes.

**Respective responsibilities of Chief Financial Officer and auditor**

As explained more fully in the Statement of the Chief Financial Officer's Responsibilities, the Chief Financial Officer is responsible for the preparation of the pension fund's financial statements in accordance with applicable United Kingdom law.

My responsibility is to report to you my 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 the London Borough of Haringey, and its compliance with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2015/16.

I also read the other information contained in the pension fund annual report and consider the implications for my report if I become aware of any apparent misstatements or material inconsistencies with the pension fund financial statements. The other information consists only of Introduction, Management and Financial Performance Report, Investment Policy and Performance Report, Scheme Administration Report, Actuarial Funding Report and Financial Report.

I conducted my work in accordance with Auditor Reporting issued by the National Audit office. My 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 the London Borough of Haringey for the year ended 31 March 2016 and comply with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2015/16.

30 September 2016

## Appendices

### Current approved versions of key policy statements

- 1 Governance Compliance Statement
- 2 Statement of Investment Principles
- 3 Communications Policy
- 4 Funding Strategy Statement



## **Appendix 1: Governance Compliance Statement**

### **1 Introduction**

This Governance Compliance Statement document sets out how governance of the Pension Fund operates in Haringey. It is prepared in accordance with paragraph 55 of the Local Government Pension Scheme Regulations 2013 and the associated statutory guidance issued by the Department for Communities and Local Government.

The objective of the Governance Compliance Statement is to make the administration and stewardship of the scheme more transparent and accountable to the stakeholders.

### **2 Council delegation**

Haringey Council, in its role as Administering Authority, has delegated responsibility for administering the Local Government Pension Scheme to the Pensions Committee. The terms of reference for the Committee were adopted by the Council on 24th March 2014, are included in the Council's constitution and are set out in the section below:

### **3 Terms of reference**

The terms of reference for Pensions Committee are set out below:

- (a) To exercise the functions which are stated not to be the responsibility of The Executive in Regulation 2 and Schedule 1 paragraph H of The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) and in any Statute or subordinate legislation further amending these Regulations relating to those matters concerning the Local Government Pension Scheme. The Committee's functions are those of the "Administering Authority" under the Pensions legislation.
- (b) Exercising all the Council's functions as "Administering Authority" and being responsible for the management and monitoring of the Council's Pension Fund and the approval of all relevant policies and statements. This includes:
  - (i) Selection, appointment and performance monitoring of investment managers, AVC scheme providers, custodians and other specialist external advisers;
  - (ii) Formulation of investment, socially responsible investment and governance policies and maintaining a statement of investment principles and funding strategy statement;
  - (iii) Determining the allocation of investments between each asset class;
  - (iv) Reviewing specialist external advisers performance;
  - (v) Publicising statements and policy documents as required by legislation, government directives and best practice.
- (c) To monitor and as appropriate to decide upon Pensions Administration issues.
- (d) Monitoring the Pension Fund Budget including Fund expenditure and actuarial valuations; and to receive the Pension Fund Budget annually.
- (e) To agree to the admission of bodies into the Council's Pension scheme.

- (f) To receive actuarial valuations.
- (g) To ensure that members of the Committee receive appropriate training to undertake their responsibilities.
- (h) To approve the Annual Accounts of the Local Government Pension Scheme and consider recommendations from the Auditor.

**4 Membership of Committee**

The Committee's membership is made up of five elected members of Haringey Council and three members representing Scheduled & Admitted Bodies, Active Members and Pensioners.

**5 Compliance with statutory guidance**

The Council is fully compliant with the statutory guidance issued by the Department for Communities and Local Government in 2008. Annex 1 details this compliance in each area of the guidance.

**6 Local Pension Board**

The Local Government Pension Scheme Regulations 2013 (paragraph 53 (4)) requires the Council to establish a Local Pension Board to assist the Pensions Committee. The Council has applied under paragraph 106(2) of the Local Government Pension Scheme (Amendment) (Governance) Regulations 2015 to operate a combined Board and Committee. While awaiting a decision by the Government, the functions of the Local Pension Board are being performed by the Pensions Committee.

**Annex 1: Compliance with Statutory Guidance**

<p><b>A. Structure</b></p> <p>a) <i>The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.</i></p> <p>b) <i>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.</i></p> <p>c) <i>That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.</i></p> <p>d) <i>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.</i></p>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>The terms of reference for Pensions Committee are clear that administration of benefits and strategic management of fund assets are part of the remit. In addition to elected members, there are three representative members on the Committee representing Scheduled &amp; Admitted Bodies, Active members and Pensioners. There is no secondary committee dealing with pension issues.</p>
<p><b>B. Representation</b></p> <p>a) <i>That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include:-</i></p> <p style="margin-left: 20px;"><i>i) employing authorities (including non-scheme employers, e.g. admitted bodies);</i></p> <p style="margin-left: 20px;"><i>ii) scheme members (including deferred and pensioner scheme members);</i></p> <p style="margin-left: 20px;"><i>iii) independent professional observers, and</i></p> <p style="margin-left: 20px;"><i>iv) expert advisers (on an ad-hoc basis).</i></p> <p>b) <i>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.</i></p>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>In addition to elected members, there are three representative members on the Committee representing Scheduled &amp; Admitted Bodies, Active members and Pensioners. Independent and expert advisers attend as required by the Committee. All representative members of the Committee have access to all papers, meetings and training on an equal footing with elected members.</p>
<p><b>C. Selection and role of lay members</b></p> <p><i>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.</i></p>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>The terms of reference for the Committee sets out the role and function of the Committee in relation to Pensions. This is supplemented by induction training offered to all new members of the Committee.</p>

<b>D. Voting</b>
<i>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.</i>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>The policy regarding voting rights is clearly set out and only elected members of the Committee are permitted to vote. Representative members are able to participate fully in all discussions of the Committee and the nature of the decisions is such that almost all have been reached by consensus, rather than voting.</p>
<b>E. Training, Facility time, Expenses</b>
<p>a) <i>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.</i></p> <p>b) <i>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.</i></p>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>There is a clear policy on reimbursement of expenses for elected members of the Committee. All members of the Committee, including non-voting representatives, have equal access to training.</p>
<b>F. Meetings (frequency/quorum)</b>
<p>a) <i>That an administering authority's main committee or committees meet at least quarterly.</i></p> <p>b) <i>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.</i></p> <p>c) <i>That administering authorities who do not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.</i></p>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>The Committee meets four times a year. Additional formal or informal e.g. training meetings are held when necessary.</p>
<b>G. Access</b>
<i>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.</i>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>All members of the Committee have equal access to all papers, documents and advice.</p>
<b>H. Scope</b>

<p><i>That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.</i></p>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>The Committee's terms of reference include the wide range of pension's issues – investment, funding, administration, admission and budgeting.</p>
<p><b>I. Publicity</b></p>
<p><i>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.</i></p>
<p><u>Haringey position</u></p> <p>Fully compliant.</p> <p>The Governance Compliance Statement is circulated to all employers in the Pension Fund and published on the Council's website.</p>

## **Appendix 2: Statement of Investment Principles**

### **1 Introduction**

This Statement of Investment Principles document sets out the principles governing the Haringey Council Pension Fund's decisions about the investment of Pension Fund money. It is prepared in accordance with Regulation 12 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009.

### **2 Governance and decision making**

Haringey Council is the Administering Authority for the Local Government Pension Scheme in the London Borough of Haringey area and as such is responsible for the investment of Pension Fund money. The Council has delegated this responsibility to the Pensions Committee.

The Committee is responsible for setting the investment strategy for the Pension Fund, appointing fund managers to implement it and monitoring the performance of the strategy. The Committee retains an independent adviser and the services of an investment consultancy company, in addition to the advice it receives from the Chief Financial Officer and their staff.

Further information on the governance of the Pension Fund can be found in the Governance Compliance Statement on the website [www.haringey.gov.uk/pensionfund](http://www.haringey.gov.uk/pensionfund)

Stock level decisions are taken by the investment managers appointed by the Committee to implement the agreed investment strategy. These decisions are taken within the parameters set out for each manager – more detail is provided in section 6 below.

### **3 Objectives of the Pension Fund**

The primary objective of the Pension Fund is:

- To provide for members' pension and lump sums benefits on their retirement or for their dependants benefits on death before or after retirement on a defined benefits basis.

The investment objective of the Pension Fund is:

- To achieve a return on Fund assets, which is sufficient, over the long term, to meet the funding objectives.

The Pension Fund recognises that the investment performance of the Fund is critical as it impacts directly on the level of employer's contributions that the employers are required to pay.

The key funding objectives that relate to investment strategy are summarised below and more detail about them and how they will be achieved can be found in the Pension Fund's Funding Strategy Statement on the website [www.haringey.gov.uk/pensionfund](http://www.haringey.gov.uk/pensionfund)

- To ensure the long-term solvency of the Fund;
- To ensure that sufficient funds are available to meet all benefits as they fall due for payment; and
- Not to restrain unnecessarily the investment strategy of the Fund so that the Administering Authority can seek to maximise investment returns (and hence minimise the cost of the benefits) for an appropriate level of risk.

This Statement of Investment Principles describes how the Haringey Council Pension Fund seeks to meet its objectives.

#### 4 Investment Parameters

The investment strategy of the Pension Fund must operate within the parameters set out in the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 ("the regulations"). The regulations state that the Pension Fund must invest any monies not needed immediately to make payments.

The regulations also state that the Pension Fund must have regard to the suitability and range of investments used and take proper advice in determining its investment strategy. These issues are covered in more detail in sections 5-7 below.

The limits within which the Pension Fund operates are shown below. All the limits are the lowest set by Schedule 1 to the regulations with the exception of the single insurance contract limit the Committee has exercised its right to increase its limit for a single insurance contract limit within the range set by the regulations. This was done, after taking proper advice, in order to maximise the diversification and performance of the Fund's assets while minimising the costs to the Pension Fund.

Type of Investment	Limit
Any single sub-underwriting contract	1%
All contributions to any single partnership	2%
All contributions to partnerships	5%
The sum of all loans (except a Government loan) and all deposits with local authorities	10%
All investments in unlisted securities of companies	10%
Any single holding (except unit trusts & UK gilts)	10%
All deposits with any single institution	10%
All sub-underwriting contracts	15%
All investments in units or shares of the investments subject to the trusts of unit trust scheme managed by any one body	25%
All investments in open ended investment companies where the	

collective investment schemes constituted by the companies are managed by one body	25%
All investments in unit or other shares of the investments subject to the trusts of unit trust schemes and all investments in open-ended investment companies where the unit trust schemes and the collective investment schemes are constituted by those companies are managed by any one body.	25%
Any single insurance contract	35%*

\* This limit is at the higher limit of the range (25-35%) laid down in the regulations.

## 5 Types of investments

The Committee has determined an overall asset allocation for the Pension Fund to meet the objectives within the parameters set out in section 4 above and to comply with the regulations. The Committee have considered the suitability of different investments and the need to diversify the investments to reduce risk. The Fund's revised strategic benchmark is shown in the table overleaf.

Asset class	Benchmark %		Range %
UK Equities		15	12-18%
Overseas Equities		45	40-50%
North America	21.7		
Europe ex UK	7.4		
Pacific ex Japan	3.4		
Japan	3.5		
Emerging Markets	9		
UK Index linked gilts		15	12-18%
Property		10	6-12%
Multi Sector Credit		5	4-6%
Private Debt		5	4-6%
Private Equity		5	4-6%
Cash		0	0-10%

The Committee's investment strategy was set following the results of the 2013 actuarial valuation of the Pension Fund and takes into consideration the value and timing of projected future benefit payments, the funding position and the range of possible future economic and financial conditions. The strategy aims to achieve the objectives set out in section three and balance the need to achieve full funding and maintain stability of contribution rates. Normally, a



full review of the investment strategy is undertaken every three years following an actuarial valuation. The factors influencing the investment strategy are monitored and changes thereto may require more frequent reviews of the investment strategy.

The allocations to each asset classes will be impacted by changes in market value, income reinvested and cash investments and withdrawals. The Committee will monitor actual allocations against the ranges shown above and rebalance when considered appropriate.

In setting investment policy the Committee has discussed their investment beliefs (annex D), which inform the setting of strategy and its implementation, including manager selection.

The Committee has decided to invest the majority of the Pension Fund investments in passively managed equity and bond funds to remove the risk of underperformance and ensure benchmark performance at a low cost.

Due to the size of the portfolios allocated to the investment managers, the investments are generally held in pooled funds, which are more cost effective for the Fund.

The majority of the investments types the Committee have decided to invest in are quickly realisable if required, as they are quoted on major markets. The investments in property, multi sector credit, private debt and private equity, which represent 25% of the strategic allocations, are long term less liquid investments not designed to be realised early. At the present time the Pension Fund has sufficient regular cash receipts to cover benefit payments and does not need to realise investments quickly. As the Pension Fund matures, income from equity investments is available to meet expenditure.

The asset allocation and associated benchmark is expected to produce a return in excess of the investment return assumed in the actuarial valuation over the long term.

## **6 Investment Management arrangements**

The Committee has appointed a number of external investment managers to implement its investment strategy. The current investment managers and the percentage of the Pension Fund they currently manage are shown in the table below:

Investment Manager	Mandate	%
Legal & General Investment Management	Global Equities & Index Linked Bonds	75
CQS Investment Management	Multi Sector Credit	5
Allianz Global Investors	Private Debt	5
CBRE Global Investors	Property	10
Pantheon	Private Equity	5

A range of investment managers have been appointed to diversify the Pension Fund and so reduce the risk of poor performance. The allocations above reflect the asset class benchmarks shown in section 5. Movements away from benchmarks and rebalancing are managed at asset class level for which monitoring ranges have been set.

The equity and index linked bond investment managers are expected to perform in line with their benchmarks, as they are investing on behalf of the Fund on a passive basis. The detail of their benchmarks is set out in Annex B. The other investment managers are expected to meet the targets set above the benchmarks detailed in Annex A over the long term.

The investment managers' performance is assessed on a quarterly basis, with independent performance data provided by the Pension Fund's global custodian Northern Trust. The Chief Financial Officer and/or their representative meet with the investment managers on an annual or more frequent basis to discuss performance.

The investment managers are paid fees relating to the value of the funds they are managing on the Pension Fund's behalf, or in the case of private equity on the amount committed. In some case e.g. private equity an additional performance related fee based is also payable.

There will always be a balance of cash used to manage benefit payments invested in-house and there may be occasions when the Committee decide to invest in cash on a short term basis. These investments will be placed in line with the Treasury Management Strategy Statement in place at the time.

## 7 Advice

The regulations set out the requirement for the Pension Fund to obtain proper advice at reasonable intervals. The Committee has three sources of advice independent of the investment managers used by the Pension Fund:

- Chief Financial Officer and their staff
- Investment Consultant – Mercer
- Independent Adviser – John Raisin

The Chief Financial Officer (or their representative) attends all Committee meetings to support the Committee to scrutinise both the performance of the investment managers and the investment consultant. The Investment Consultant and Independent Adviser attend Committee meetings as required.

## 8 Risk

The Pension Fund's investment strategy has an inherent degree of risk which has to be taken in order to achieve the rate of return required. The Pension Fund has put in place a number of controls in order to minimise the level of risk taken.

The benchmark the Committee has set involves a wide range of asset classes and geographical areas. This diversification reduces the risk of low returns. As the majority of the Fund is invested on a passive basis, risk of underperforming the benchmark has been significantly reduced.

Appointing a range of investment managers ensures that the risk of underperformance is reduced through diversification.

## **9 Responsible ownership**

The Committee has agreed a responsible investment policy, which can be found on the website [www.haringey.gov.uk/pensionfund](http://www.haringey.gov.uk/pensionfund)

The Pension Fund believes the adoption by companies of positive Environmental, Social and Governance principles can enhance their long term performance and increase their financial returns. The Pension Fund has demonstrated this by adopting the United Nations Principles for Responsible Investment and by being a member of the Local Authority Pension Fund Forum, which undertakes engagement activity with companies on behalf of its members.

The investment managers are expected to consider responsible investment issues when voting on behalf of the Pension Fund. However in instances where shareholder value and responsible investment conflict, the investment managers are instructed to vote for shareholder value and report these instances to the Committee. All investment managers are expected to vote in respect of all pooled funds.

## **10 Compliance with Myners Principles**

The regulations require Local Government Pension Funds to state in their Statement of Investment Principles the extent to which the Fund's investment policy complies with published guidance on the Myners Principles. The Myners principles are a set of principles on investment decision making for occupational pension schemes. The Pension Fund complies with all of these principles. The detail of the principles is set out in Annex D.

## **11 Additional Voluntary Contributions (AVCs)**

The Pension Fund is required to provide scheme members with the opportunity to invest additional voluntary contributions. These are invested separately from the Pension Fund's other assets and the scheme members take the investment risk.

AVCs are invested with Prudential Assurance, Clerical & Medical and Equitable Life. Scheme members can choose which company to invest with

(except Equitable Life, which is not open to new members) and select from a range of policies to suit their appetite for risk.

## 12 Other issues

Custody – The Pension Fund's assets are held by an independent global custodian, Northern Trust. The performance and fees for their contract are reviewed regularly. As the Pension Fund does not directly own equities, bonds or properties, custody activity is limited to controlling cash, valuation record keeping and performance analysis.

Stock Lending – The Pension Fund does not undertake any stock lending activities. However, the pooled funds operated by Legal & General do engage in stock lending and the Pension Fund receives a share of the revenue generated.

Review process – This document is reviewed by the Committee on an annual basis and whenever any major change to the investment strategy is undertaken to ensure it remains up to date.

Publication – This document is published on the Haringey Council Pension Fund website [www.haringey.gov.uk/pensionfund](http://www.haringey.gov.uk/pensionfund) and forms part of the Pension Fund Annual Report.

### Annexes

- A Investment managers and mandates
- B Global Equity & Bond benchmarks
- C Compliance with Myners principles
- D Investment beliefs

**Annex A: Investment Managers and mandates**

<b>Manager</b>	<b>% of Total Portfolio</b>	<b>Mandate</b>	<b>Benchmark</b>	<b>Performance Target</b>
Legal & General Investment Management	75.00%	Global Equities & Bonds	See below	Index (passively managed)
CQS	5.00%	Multi Sector Credit	3 month GBP libor + 5.5% p.a.	Benchmark
Alliance	5.00%	Infrastructure Debt	5.5% p.a.	Benchmark
CBRE Global Investors	10%	Property	IPD UK Pooled Property Funds All Balanced Index	+1% gross of fees p.a. over a rolling 5 yr period
Pantheon Private Equity	5%	Private Equity	MSCI World Index plus 3.5%	Benchmark.
<b>Total</b>	<b>100%</b>			

**Annex B: Global Equity & Bond Benchmarks**

<b>Asset Class</b>	<b>Benchmark</b>	<b>Legal &amp; General Investment Management</b>	<b>Total</b>
UK Equities	FTSE All Share	15.00%	15.00%
Overseas Equities		45.00%	45.00%
North America	FT World Developed North America GBP Unhedged	21.70%	21.70%
Europe ex UK	FT World Developed Europe X UK GBP Unhedged	7.40%	7.40%
Pacific ex Japan	FT World Developed Pacific X Japan GBP Unhedged	3.40%	3.40%
Japan	FT World Developed Japan GBP Unhedged	3.50%	3.50%
Emerging Markets	FT World Global Emerging Markets GBP Unhedged	9.00%	9.00%
Index Linked Gilts	FTA Index Linked Over 5 Years Index	15.00%	15.00%
		75.00%	75.00%

**Annex C: Compliance with Myners Principles**

<p><b>1. Effective Decision Making</b></p>
<p><i>Administering authorities should ensure that:</i></p> <ul style="list-style-type: none"> <li>• <i>decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation;</i></li> <li style="padding-left: 20px;"><i>and</i></li> <li>• <i>those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest.</i></li> </ul>
<p><u>Haringey position</u>                  Haringey offers regular training to all members of the Committee to ensure they have the necessary knowledge to make decisions and challenge the advice they receive.</p>
<p><b>2. Clear Objectives</b></p>
<p><i>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, and these should be clearly communicated to advisers and investment managers.</i></p>
<p><u>Haringey position</u>                  The Pension Fund sets out an investment objective in section 2 of this Statement of Investment Principles, which reflects the current deficit position of the Pension Fund and the desire to return to full funding with a minimum impact on the local tax payer. The Statement of Investment Principles is provided to all the Pension Fund’s advisers and investment managers whenever it is updated.</p>

**3. Risk 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.*

Haringey position

The Committee's investment strategy was set following the results of the last formal valuation of the Pension Fund, which incorporated these issues.

**4. Performance Assessment**

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

Haringey position

The Committee reviews the performance of Pension Fund investments on a quarterly basis and meets with investment managers at least once a year. Contracts with advisers are reviewed regularly. The Committee undertakes an assessment of their own effectiveness on a regular basis.



<p><b>5. Responsible ownership</b></p>
<p><i>Administering authorities should:</i></p> <ul style="list-style-type: none"> <li>• <i>adopt or ensure their investment managers adopt, the Institutional Shareholders' Committee Statement of Principles on the responsibilities of shareholders and agents</i></li> <li>• <i>include a statement of their policy on responsible ownership in the statement of investment principles</i></li> <li>• <i>report periodically to scheme members on the discharge of such responsibilities.</i></li> </ul>
<p><u>Haringey position</u>                  The Pension Fund's fund managers have adopted or are committed to the Institutional Shareholders' Committee Statement of Principles. The Pension Fund includes a statement of their policy on responsible ownership in section 9 of this Statement of Investment Principles. This is monitored on a quarterly basis through the Committee and reported to scheme members through the annual report to scheme members.</p>
<p><b>6. Transparency and reporting</b></p>
<p><i>Administering authorities should:</i></p> <ul style="list-style-type: none"> <li>• <i>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</i></li> <li>• <i>provide regular communication to scheme members in the form they consider most appropriate.</i></li> </ul>
<p><u>Haringey position</u>                  The Pension Fund communicates with its stakeholders through the publication of policy statements and an Annual Report on its website. The Pension Fund communicates regularly with its scheme members and the communication policy statement provides information about how this is done.</p>

Annex 4

## Statement of Investment Beliefs

The objective of this Statement is to set out the key investment beliefs held by the Pensions Committee (the Committee) of Haringey Council. These beliefs will form the foundation of discussions, and assist decisions, regarding the structure of the Haringey Pension Fund, strategic asset allocation and the selection of investment managers.

The Investment beliefs have been prepared by the administering authority in consultation with the Independent Advisor and Investment Consultant. In forming these beliefs the Committee take into consideration the ongoing advice received from Officers and Advisors.

### 1) Investment Governance

- a) The Fund has the necessary skills, expertise and resources to take decisions on asset allocations, rebalancing and fund manager appointments.
- b) Day to day investment decisions are delegated to regulated external fund managers that have appropriate skills & experience.
- c) Investment consultants, independent advisors and officers are a source of expertise and research to inform Committee decisions.
- d) The Committee primary goal is the security of assets and will only take decisions when the Committee is convinced that it is right to do so. In that regard, training in advance of decision making is a priority.

### 2) Long Term Approach

- a) The strength of the employers' covenant allows a longer term deficit recovery period and for the Fund to take a long term view of investment strategy.
- b) The most important aspect of risk is not the volatility of returns but the risk of absolute loss and of not meeting the objective of facilitating low, stable contribution rates for employers.
- c) Illiquidity and volatility are shorter term risks which offer potential sources of additional compensation to the long term investor. Moreover, it is important to avoid being a forced seller in short term markets.
- d) Participation in economic growth is a major source of long term equity return.

- e) Over the long term, equities are expected to outperform other liquid assets, particularly government bonds.
- f) Well governed companies that manage their business in a responsible manner will produce higher returns over the long term.

### **3) Appropriate Investments**

- a) Allocations to asset classes other than equities and government bonds (e.g. corporate bonds, private equity and property) offer the Fund other forms of risk premia (e.g. additional solvency risk/illiquidity risk).
- b) Diversification across asset classes and asset types will tend to reduce the volatility of the overall Fund return.

### **4) Management Strategies**

- a) Passive management provides low cost exposure to asset class returns and is especially attractive in efficient markets where there is limited evidence that active management can consistently generate returns (after additional costs) that exceed index benchmarks. Most equity markets are sufficiently efficient to prefer passive equity investments.
- b) Active management will only be considered in markets in which passive approaches are either impossible or there is strong evidence that active management can add value over the long-term. Fixed income, property and alternatives are suited to active management.
- c) Active managers are expensive and fees should be aligned to the value created in excess of the performance of the market.
- d) Active management performance should be monitored over multi-year rolling cycles and assessed to confirm that the original investment process on appointment is being delivered and that continued appointment is appropriate.
- e) Implementation of strategies must be consistent with the governance capabilities of the Committee.

### **Appendix 3: Communications Policy**

#### **Local Government Pension Scheme Regulations 2013 Regulation 61**

#### **Policy Statement on Communications with Scheme Members and Employers**

Effective communication between Haringey Council, the scheme members, and the employers within the fund is essential to the proper management of the LGPS on a transparent and accountable basis.

This document sets out a policy framework within which the Council will communicate with :-

- Members of the scheme and their family units.
- Representatives of members
- Employing bodies and
- Prospective members

It identifies the format, frequency and method of distributing information and publicity. It also outlines the processes for promoting the scheme to prospective members and employing bodies.

#### **Members of the scheme:**

##### **A. Points of Contacts:**

- i. Pension Team for day-to-day contact and visits.
- ii. Ad hoc briefings and workshops
- iii. Harinet
- iv. Pensions Web Page

A pensions page is maintained on Harinet and on the Haringey Web Site which provides:-

- Guides to the LGPS including Pension Sharing on Divorce, Increasing Pension Benefits and the Appeals Process
- Forms which allow members to :-
  - Join or leave the scheme or opt to join the 50/50 scheme.
  - Indicate to the Council how any death grant should be disbursed.
- Policy Statements on the use of the Council's Discretionary Powers, Investment Principles. The Financial Strategy Statement and the Communications Strategy
- Annual Reports and Pensions Bulletins

- Notice of events
- Contact details for the Pensions Team
- Links to other useful sites including the scheme regulations and on-line to the Local Government Pension Scheme.

The information held on the Harinet and Pensions Web Pages is reviewed and updated on a regular basis. Although the web page mirrors the information held on Harinet, it extends to a wider audience and allows the family unit to access pensions information relevant to them.

#### B. Levels of Communication:

- i. General day to day administration of the scheme
- ii. Annual payslips and annual newsletter to Pensioner Members
- iii. Statutory notices and statements e.g : individual notices regarding entry to the scheme or hours changes and Annual Benefits Statements .
- iv. Formal notice of significant proposals to change the scheme
- v. Life certificates to Pensioners living abroad.

#### C. Medium of communication

- i. Telephone and e-mail
- ii. Hard copy dispatches
- iii. Workshops/ Employee Briefings
- iv. Face to face meetings

#### D. Timing

- i. General policy is to issues statutory notifications and statements within the prescribed limits and to respond to written enquiries within 10 working days.
- ii. An Annual Report on the Fund is published annually.
- iii. Pension Bulletins on items of significance are issued as the need arises.
- iv. The Pensions Newsletter is published in April of each year to coincide with pensions increase awards.
- v. The Deferred Members Newsletter is published each year and coincides with the distribution of the Deferred Members Annual Benefits Statements

We are proposing to introduce a new online feature in 2015 called Member Self Service (MSS). Member Self Service will allow Local Government Pension Scheme members to access their pension records via a secure portal, update certain personal information and perform their own bespoke calculations.

## **Representatives of members**

### **A. Points of Contact**

- i. The Corporate Industrial Relations Group
- ii. Council and Staff Joint Consultative Committee
- iii. Pensions Committee and General Purposes Committee
- iv. Face to face meetings or issues raised in correspondence or by telephone.
- v. Ad hoc presentations to Trade Union Officers and work place representatives.

### **B. Levels of communication**

- i. Consultation on proposed scheme changes and significant policy issues on the use of employer discretions.
- ii. Joint meetings with staff affected by TUPE transfers
- iii. Response to employee complaints or queries via their representatives.
- iv. Semi- formal meetings to brief employee representatives on scheme changes or to explain existing scheme rules.

### **C. Medium of communication**

- i. Telephone and e-mail
- ii. Hard copy dispatches
- iii. Group meetings at Officer level
- iv. Committee meetings at Elected Member level
- v. Face to face meetings

### **D. Timing**

Formal meetings are dictated by pre determined dates. Informal meetings as an when required.

## **Employers**

### **A. Points of contact:**

Day to day contact falls into three categories:-

- i. Pensions Team for day to day administration

- ii. Pay Support (where the Council provides a payroll service)
- iii. Finance for FRS 17 disclosure and funding issues.

**B. Levels of Communication:**

- i. General day to day administration of the scheme
- ii. Formal notification of discussion documents and consultation papers
- iii. Employer briefings on issues affecting the scheme including an Employers Guide to the LGPS
- iv. Pre and post fund valuation meetings.

**C. Medium of communication**

- i. Telephone and e-mail
- ii. Site visits
- iii. Hard copy dispatches

**D. Timing**

The general policy is to keep employers informed of issues as they arise or are expected to arise in good time for the appropriate action to be taken or comments considered.

We are proposing to improve the data quality from the employers through the implementation of iconnect which is a system to interface between employer payroll systems and the pension systems and should improve data quality at source.

**Prospective Members and promoting the LGPS**

- i. All new starters are issued with a leaflet Important Pensions Information as part of their new starter packs. This gives a brief outline of the scheme benefits and the alternative choices available.
- ii. An Annual Benefits Statement are issued yearly. This ensures that members appreciate the value of being a scheme member which they can share with colleagues.
- iii. Promotions of the Additional Voluntary Contributions Scheme are held in conjunction with the Council's AVC providers. These events are open to all staff and act to attract non members to the LGPS.

**Appendix 4: Funding Strategy Statement**

**London Borough of Haringey Pension Fund**  
**Funding Strategy Statement**

**March 2014**

**Funding Strategy Statement**

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# 1 Introduction

## 1.1 What is this document?

This is the Funding Strategy Statement (FSS) of the London Borough of Haringey Pension Fund (“the Fund”), which is administered by the London Borough of Haringey, (“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 advisers. It is effective from 1 April 2014.

## 1.2 What is the London Borough of Haringey 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 Haringey Fund, in effect the LGPS for the Haringey area, 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 roles and 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 of which includes:

- the LGPS Regulations;

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- 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;
- 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: 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 funding strategy objectives, which are:

- 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,

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- 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 Dapo Shonola, Head of Finance: Treasury & Pensions in the first instance at e-mail address [oladapo.shonola@haringey.gov.uk](mailto:oladapo.shonola@haringey.gov.uk) or on telephone number 02084893726.

## 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 employer’s 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 17 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](#).

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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 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: academy schools, contractors, housing associations, charities, etc.

The LGPS Regulations define various types of employer as follows:

**Scheduled bodies** – The Council 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 – **transfree 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.

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## **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. Whilst 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 benefitting 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	Local Authorities	Academies	Colleges	Open to new entrants	Closed to new entrants	(all)
Basis used	Ongoing, assumes long-term Fund participation (see <a href="#">Appendix E</a> )			Ongoing, but may move to "gilts basis" - see <a href="#">Note (a)</a>		Ongoing, assumes fixed contract term in the Fund (see <a href="#">Appendix E</a> )
Future service rate	Projected Unit Credit approach (see <a href="#">Appendix D – D.2</a> )			Attained Age approach (see <a href="#">Appendix D – D.2</a> )		Projected Unit Credit approach (see <a href="#">Appendix D – D.2</a> )
Stabilised rate?	Yes - see <a href="#">Note (b)</a>	Yes - see <a href="#">Note (b)</a>	No	No	No	No
Maximum deficit recovery period – <a href="#">Note (c)</a>	20 years	20 years	20 years	20 years	20 years	Outstanding contract term
Deficit recovery payments – <a href="#">Note (d)</a>	Monetary amount	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	3 years - <a href="#">Note (e)</a>	3 years - <a href="#">Note (e)</a>	3 years - <a href="#">Note (e)</a>	None
Review of rates – <a href="#">Note (f)</a>	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	<a href="#">Note (g)</a>	n/a	<a href="#">Note (h)</a>		<a href="#">Notes (h) &amp; (i)</a>
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 principles applied would be as per <a href="#">Note (j)</a> .			Can be ceased subject to terms of admission agreement. Cessation debt will be calculated on a basis appropriate to the circumstances of cessation – see <a href="#">Note (j)</a> .		Participation is assumed to expire at the end of the contract. Cessation debt (if any) calculated on ongoing basis. Awarding Authority will be liable for future deficits and contributions arising.



## **Note (a)** (Basis for CABs 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
Starting rate*	23.9% (as at 1 <sup>st</sup> April 2014)
Max contribution increase	+1% of pay
Max contribution decrease	-1% of pay

\*In practice, contribution rates will show the future service rate based on a percentage of pay and the past service adjustment as a monetary amount.

The stabilisation criteria and limits will be reviewed at the 31 March 2016 valuation, to take effect from 1 April 2017. This will take into account the employer's 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 target date for full funding 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 prudent period to be agreed with the body or its successor.

For academies where written notice has been served terminating their funding agreement with the Department for Education, the period is reduced to the period of notice (with immediate effect).

For Community Admission Bodies without a guarantor, the period will generally be equal to the average future working lifetime of their active employee members.

#### **Note (d)** (Deficit Recovery Payments)

The Administering Authority reserves the right to amend the deficit recovery payments between valuations and/or to require these payments in monetary terms (if they are paid in percentage of pay terms), for instance where:

- the employer is relatively mature, i.e. has a large deficit recovery contribution rate (e.g. above 15% of payroll), in other words its payroll is a smaller proportion of its deficit than is the case for most other employers, or
- there has been a significant reduction in payroll due to outsourcing or redundancy exercises, or

- the employer has closed the Fund to new entrants.

**Note (e)** (Phasing in of contribution changes)

All phasing is subject to the Administering Authority being satisfied as to the strength of the employer's covenant.

Normally the Fund will require the employer to pay at least its future service rate each year.

Employers which have no active members at this valuation will not be phased.

**Note (f)** (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)

At the time of writing, 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;
- 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) The academy may, if it chooses, restrict its contribution rate to be no more than 24.9% in 2014-15, 26.9% in 2015-16 and 28.9% in 2016-17. However, this does not affect the Academy's ultimate obligations to the Fund, and it remains responsible for the funding of all benefits of its employees.

The Fund's policies on academies are subject to change in the light of any amendments to DCLG guidance. Any changes will be notified to academies, and will be reflected in a subsequent version of this FSS. In particular, policies (d) and (e) above will be reconsidered at each valuation.

## **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 future 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 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 the council or an 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 is 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 is willing to administer any of the above options as long as the approach is documented in the Admission Agreement as well as the transfer agreement. The Admission Agreement should ensure that some element of risk transfers to the contractor where it relates to their decisions and it is unfair to burden the letting employer with that risk. 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. The pooling of contributions is 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.

Haringey Council may be pooled with the legacy liabilities and assets following cessation of an employer. Schools generally are also pooled with the Council, however there may be exceptions for specialist or independent schools.

In general, the Administering Authority does not permit other pools, but will consider new proposals on a case by case basis.

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.

Normally the payment is payable as a single lump sum and is not spread.

### **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 holds satisfactory current insurance policy covering ill health early retirement strains the Administering Authority may agree to waive some or all of the ill health allowance set out in 3.7.

### 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 \(i\)](#)) 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 employers in the Fund.
- 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.

### 3.11 Collection of contributions

To avoid loss of income and the administration cost of late payment of contributions, employers will be required to pay employer and employee contributions by way of direct debits in favour of the pension fund.

## 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 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.

A particular issue 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 [3.3 Note \(b\)](#)). The modelling demonstrated that retaining the present investment strategy, coupled with constraining employer contribution rate changes as described in [3.3 Note \(b\)](#), 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 annually monitors the relative funding position, i.e. changes in the relationship between asset values and the liabilities value. It reports this to the Corporate Committee.

## 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 [DATE] for comment;
- b) Comments were requested within [30] days;
- c) Following the end of the consultation period the FSS was updated where required and then published, in [DATE].

### A3 How is the FSS published?

The FSS is made available through the following routes:

- Published on the website, at [CLIENT URL];
- A copy sent by [post/e-mail] to each participating employer in the Fund;
- A copy sent to [employee/pensioner] representatives;
- A full copy [included in/linked from] the annual report and accounts of the Fund;
- Copies sent to investment managers and investment 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 Corporate 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 [CLIENT URL].

## 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:-**

- council officers and investment advisers (investment consultant and independent advisor) 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 advice may be sought by the Administering Authority on efficient structures, 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 <a href="#">3.9</a>).</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 <a href="#">Note (b)</a> to <a href="#">3.3</a>).</p> <p>For other employers, review of contributions is</p>



Risk	Summary of Control Mechanisms
	permitted in general between valuations (see <a href="#">Note (f) to 3.3</a> ) 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 pension's 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. The next triennial valuation of the is as at 31 March 2016.</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 Best Value 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, where-ever possible (see <u>Notes (h) and (j) to 3.3</u>).</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 <u>Note (f) to 3.3</u>).</p> <p>Reviewing contributions well ahead of cessation if thought appropriate (see <u>Note (a) to 3.3</u>).</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*<sup>1</sup>, 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 employer<sup>2</sup>. 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](#)).

<sup>1</sup> See LGPS (Administration) Regulations 36(5).

<sup>2</sup> See LGPS (Administration) Regulations 36(7).

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.

**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 1% above the retail prices index (RPI) per annum. This is a change from the previous valuation, which assumed a two year restriction at 1% per annum followed by longer term growth at RPI plus 1.5% per annum.

The current assumption of 1% pa above RPI in effect captures the anticipated continued short term public sector pay restrictions, with an expectation of return to real salary growth in the long term thereafter.

**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. This is a change from the 2010 valuation, when actuarial profession standard tables were adopted.

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.

The combined effect of the above changes from the 2010 valuation approach is to maintain broadly the same life expectancies on average. The approach taken is considered reasonable in light of the long term nature of the Fund and the assumed level of security underpinning members’ benefits.

**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

<b>Actuarial assumptions/basis</b>	The combined set of assumptions made by the actuary, regarding the future, to calculate the value of <b>liabilities</b> . The main assumptions will relate to the <b>discount rate</b> , salary growth, pension increases and longevity. More prudent assumptions will give a higher liability value, whereas more optimistic assumptions will give a lower value.
<b>Administering Authority</b>	The council with statutory responsibility for running the Fund, in effect the Fund's "trustees".
<b>Admission Bodies</b>	Employers which voluntarily participate in the Fund, so that their employees and ex-employees are <b>members</b> . There will be an Admission Agreement setting out the employer's obligations. For more details (see <a href="#">2.5</a> ).
<b>Common contribution rate</b>	The Fund-wide <b>future service rate</b> plus <b>past service adjustment</b> . It should be noted that this will differ from the actual contributions payable by individual <b>employers</b> .
<b>Covenant</b>	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.
<b>Deficit</b>	The shortfall between the assets value and the <b>liabilities</b> 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).
<b>Deficit repair/recovery period</b>	The target length of time over which the current <b>deficit</b> is intended to be paid off. A shorter period will give rise to a higher annual <b>past service adjustment</b> (deficit repair contribution), and vice versa.
<b>Designating Employer</b>	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.
<b>Discount rate</b>	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 <b>liabilities</b> value which is consistent with the present day value of the assets, to calculate the <b>deficit</b> . A lower discount rate gives a higher liabilities value, and vice versa. It is similarly used in the calculation of the <b>future service rate</b> and the <b>common contribution rate</b> .
<b>Employer</b>	An individual participating body in the Fund, which employs (or used to employ) <b>members</b> of the Fund. Normally the assets and <b>liabilities</b> values for each employer are individually tracked, together with its <b>future service rate</b> at each <b>valuation</b> .
<b>Funding level</b>	The ratio of assets value to <b>liabilities</b> value: for further details (see <a href="#">2.2</a> ).
<b>Future service rate</b>	The actuarially calculated cost of each year's build-up of pension by the current active <b>members</b> , excluding members' contributions but including Fund

administrative expenses. This is calculated using a chosen set of **actuarial assumptions**.

<b>Gilt</b>	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.
<b>Guarantee / guarantor</b>	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 <b>covenant</b> to be as strong as its guarantor’s.
<b>Letting employer</b>	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.
<b>Liabilities</b>	The actuarially calculated present value of all pension entitlements of all <b>members</b> of the Fund, built up to date. This is compared with the present market value of Fund assets to derive the <b>deficit</b> . It is calculated on a chosen set of <b>actuarial assumptions</b> .
<b>LGPS</b>	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.
<b>London CIV</b>	London Collective Investment Vehicle is an investment vehicle and aims to be the investment vehicle of choice for Local Authority Pension Funds through successful collaboration and delivery of compelling performance.
<b>Maturity</b>	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.
<b>Members</b>	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).
<b>Past service</b>	The part of the employer’s annual contribution which relates to past service <b>deficit</b>

<b>adjustment</b>	repair.
<b>Pooling</b>	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 <b>deficit</b> , or (if formally agreed) it may allow <b>deficits</b> to be passed from one employer to another. For further details of the Fund's current pooling policy (see <a href="#">3.4</a> ).
<b>Profile</b>	The profile of an employer's membership or liability reflects various measurements of that employer's <b>members</b> , 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 <b>maturity</b> also.
<b>Rates and Adjustments Certificate</b>	A formal document required by the LGPS Regulations, which must be updated at least every three years at the conclusion of the formal <b>valuation</b> . 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.
<b>Scheduled Bodies</b>	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).
<b>Solvency</b>	In a funding context, this usually refers to a 100% <b>funding level</b> , i.e. where the assets value equals the <b>liabilities</b> value.
<b>Stabilisation</b>	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.
<b>Theoretical contribution rate</b>	The employer's contribution rate, including both <b>future service rate</b> and <b>past service adjustment</b> , which would be calculated on the standard <b>actuarial basis</b> before any allowance for <b>stabilisation</b> or other agreed adjustment.
<b>Valuation</b>	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.

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**Report for:** Pensions Committee 20<sup>th</sup> September 2016

**Item number:** 9

**Title:** Ill Health Liability Insurance Report

**Report authorised by:** Tracie Evans, Chief Operating Officer (COO)

**Lead Officer:** Oladapo Shonola, Head of Finance - Treasury & Pensions  
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**Ward(s) affected:** N/A

**Report for Key/  
Non Key Decision:** Non Key decision

## 1. Describe the issue under consideration

- 1.1. This paper provides information on the potential impact of Ill Health Early Retirement (IHER) on Haringey Pension Fund and how this liability could be mitigated by taking out Ill Health Liability Insurance (IHLI).
- 1.2. The report also considers three possible options to adopt as to the level of ill health insurance that should be adopted by the Fund; Whole Fund, Partial Fund or Employer Choice.
- 1.3. The paper proposes how the cost of purchasing ill health liability insurance should be funded by considering three approaches: No Allowance; Partial Allowance; or Full Allowance.

## 2. Cabinet Member Introduction

- 2.1. Not applicable.

## 3. Recommendations

- 3.1. That the Committee note the content (including the appendix) of this report around ill health early retirement (IHER) cost risks and the possibility that some employers could find it difficult to remain a going concern if their employee(s) were forced to take early retirement due to ill health if IHLI is not in place.
- 3.2. That the Committee agree that the Fund should adopt a whole of fund approach to funding the cost of IHER insurance.

- 3.3. That the Committee agree that the cost of purchasing IHLI is met by the Fund on a Full Allowance basis.

#### **4. Reason for Decision**

- 4.1. At present the Fund self insures itself against ill-health retirement. When an employee is retired on grounds of ill-health, the strain to the Fund will be apportioned to the relevant employer. At the next triennial valuation, the strain cost arising from early retirements will be calculated and added to relevant employer's future contribution rates.
- 4.2. For the larger employers, like the Council, this is not necessarily a significant risk. However, for smaller employers in the Fund, such as academies and contractors providing lunches in schools, it could be the difference between going out of business and remaining a going concern.
- 4.3. While there has not been a case of an employer in the Fund going out of business due to inability to mitigate the cost of ill health retirement, an employer has complained about the potential cost of having to do so. Furthermore, Age UK recently went into liquidation as a result of its inability to fulfil its financial responsibility to the Fund in respect of payments relating to outstanding liability/deficit. Although, it is possible that some of the cost may have been accrued through ill health retirement of staff in the past.
- 4.4. Taking out IHER insurance would mitigate the risk of potential financial difficulties that may arise from an employer having to meet the cost of one or more of its employees having to retire due to ill health.

#### **5. Other options considered**

- 5.1. The Fund could continue as it currently does where it charges any strain costs arising from ill-health retirement to the relevant employer and increase the employers' contribution at the next valuation to recover the cost of the ill-health retirement to the Fund.

#### **6. Background information**

- 6.1. When a member of the pension scheme is retired on grounds of ill-health, the Fund incurs additional costs and the liability for this cost is added to the relevant employers' deficit/liability to the Fund.
- 6.2. At present the Fund's approach is that employers effectively self-insure against ill health early retirement (IHER) costs via an element of their contribution rate. For example, in the London Borough of Haringey

Council Pool, employers pay around 3.0% of pensionable payroll per annum towards IHERs but this amount varies from employer to employer depending on membership profile.

- 6.3. When a member of an employer retires due to ill health the strain cost is added to the employer's deficit at the next valuation and subsequently recovered via increased contributions.
- 6.4. This arrangement works for larger employers (e.g. the Council) but not for smaller employers (e.g. Academies, school lunch providers/cleaners). There is a risk that some employers in the Fund may be unable to meet the strain cost arising from an ill-health early retirement. In the worst case the increased deficit and contributions could put an employer out of business.
- 6.5. There are currently 22 funds that have taken out a form of ill health liability insurance to protect the employers and it is being considered by another 16 funds. This equates to approximately 40% of Funds that are either considering or already have ill health liability insurance in place.
- 6.6. An illustration of the potential strain cost of an employee, which will result in an immediate increase in the relevant employers' deficit/liability to the Fund, is shown below.

Member Age	Salary	Tier 1 Strain Cost
46	£32,000	£375,000
31	£26,000	£350,000
48	£67,000	£575,000
43	£110,000	£1,600,000

- 6.7. There had previously not being a tailored product for LGPS that would allow insurance against IHER risk. However, Legal and General are now able to offer ill health liability insurance to LGPS schemes at cost of £0.88p, £0.95p and £1.28p per £100 of payroll for Whole Fund, Partial Fund and Employers choice respectively.
- 6.8. Using approximate payroll cost of £115m for all employers in the Fund, the total cost to the whole fund of taking out IHLI is estimated at £1.1m. The IHER could be funded using the assumed ill health element of employers' contributions. This currently stands at 3% of payroll (£3.45m), but the actuary has estimated that this could fall to 2% (£2.3m) for the next valuation.
- 6.9. Employer contribution rates would normally be adjusted up where IHER costs have been incurred between triennial valuations. Otherwise, the ongoing ill health percentage within the overall contribution rate will be maintained.

6.10. The Fund should consider implementation of one of the following approaches:

- **Whole Fund** - This is an approach to managing the ill health risk as part of funding strategy whereby the Administering Authority maintains an ill health liability insurance policy on behalf of all of the employers;
- **Partial Fund** - the Administering Authority maintains an ill health liability insurance policy on behalf of all of the employers except for the Council;
- **Employer's Choice** - Individual employers given the option to take out their own insurance policy with Legal and General. This will result in multiple policies across the Fund.

6.11. In terms of how the insurance premium is funded, the Fund could take the following three approaches:

- **Full Allowance** – Fully allow for the premium in the contribution rate (i.e. the full amount would be deducted from the employers contribution rate);
- **Partial Allowance** – partially allow for the premium in the contribution rate;
- **No Allowance** – premium will be charged on top of the contribution rate, so that no allowance is given for premium to be deducted for contribution rate.

6.12. The attached appendix to this report sets out, in more detail, the insurance options against IHER cost.

## 7. Contribution to Strategic Outcomes

7.1. None.

## 8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

### Finance and Procurement

8.1. In the past, the Fund has taken the approach of allowing employers to pay for the cost of ill health retirement by adjusting employer



contribution rates at each triennial valuation. This carries a risk that due to ill health retirement and a subsequent adjustment of contribution rates, smaller employers in the Fund may find the resulting annual monetary contribution prohibitive and therefore unable to carry on as a going concern.

- 8.2. The availability of an insurance product that allows the Fund to eradicate this risk for all employers is an attractive option that merits serious consideration.
- 8.3. The report proposes that the Fund purchase ill health liability insurance at whole fund level and that the cost of premiums is funded from contributions/existing fund assets. This option is deemed the best approach to ensure that the risk to the Fund from ill health early retirement is fully mitigated.

#### Assistant Director of Corporate Governance

- 8.4. The Assistant Director of Corporate Governance has been consulted on the content of this report. The recommendation set out in this report is in effect a review of the funding strategy statement. The Fund must keep the funding strategy statement under review and, after consultation with such persons as it considers appropriate, make such revisions as are appropriate following a material change in its policy set out in the statement, and if revisions are made.
- 8.5. In reviewing the funding strategy statement the Fund must have regards to the guidance set out in the document published in March 2004 by CIPFA, the Chartered Institute of Public Finance and Accountancy and called "CIPFA Pensions Panel Guidance on Preparing and Maintaining a Funding Strategy Statement and the statement of investment principles published by the administering authority under regulation 12 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 (members should note that this Regulation is due to be replaced by Regulation 7 in the proposed new Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016)..

#### Equalities

- 8.6. There are no equalities issues arising from this report.

### **9. Use of Appendices**

- 9.1. Appendix 1 – Ill Health Retirement Cost: Risk Mitigation Using Insurance

### **10. Local Government (Access to Information) Act 1985**

10.1. Not applicable.

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## Ill health early retirement costs: risk mitigation using insurance

### Purpose

This paper has been requested by and is addressed to London Borough of Haringey Council as the Administering Authority to London Borough of Haringey Council Pension Fund (“the Fund”). It is intended to provide a general overview of some issues and considerations surrounding ill health retirement insurance for Funds in the Local Government Pension Scheme (“LGPS”). This paper is not intended to provide advice and should not be read as such.

### Background on Ill Health Early Retirements (“IHERs”)

When an LGPS member is awarded early retirement on grounds of ill-health there is an increase in the pension liability for the participating employer (“the strain cost”). This results from:

- early payment of the pension; and
- an increase in the benefits payable to the member through augmentation awarded on ill-health retirement (either based on full prospective service for a Tier 1 early retirement or 25% of prospective service for a Tier 2 early retirement).

Examples of sample member potential strain costs are given below. These represent an immediate increase to the liabilities (and hence deficit) of an employer.

Member age	Salary	Tier 1 strain cost
46	£32,000	£375,000
31	£26,000	£350,000
48	£67,000	£575,000
43	£110,000	£1,600,000

At present the Fund’s approach is that employers effectively self-insure against IHERs via an element of their contribution rate. For example, in the London Borough of Haringey Council Pool, employers pay around 3.0% of pensionable payroll p.a. towards IHERs but this amount varies from employer to employer depending on membership profile. When a member of an employer retires due to ill health the strain cost is added to the employer’s deficit at the next valuation and subsequently recovered via increased contributions. This arrangement works for larger employers (e.g. the Council) but not for smaller employers (e.g. Academies). There is a risk that some employers in the Fund may be unable to meet the strain cost arising from an ill-health early retirement. In the worst case the increased deficit and contributions could put a Fund employer out of business.

### What is ill health liability insurance (IHLI)?

In 2008 Hymans Robertson was approached by an LGPS client raising their concerns about the ill health cost risks employers face. It was clear that insurance might be a good solution but there was no insurance product covering the benefits payable in the LGPS. Hymans Robertson’s Group Risk team searched the market and chose Legal and General as partner to develop what was, and remains, the only insurance solution specifically designed for LGPS ill-health early retirement benefits.

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The IHLI policy provided by Legal and General pays a one-off lump sum to insured employers or Funds in the event that an employee is awarded IHER (Tier 1 or Tier 2 only). This payment is equal to the strain cost as calculated by the Fund using standard factors. It provides an immediate increase to an employer's assets to offset the increase in liability. (Note that this sum may eventually prove to be more or less than the actual additional cost: IHLI covers the immediate strain cost calculated at the time of the IHER, as opposed to insuring the ill-health pension payments for the future.)

The insurance premium can be paid from the assets of the Fund. Each employer covered by insurance will have its share of the premium deducted from its own assets (the share would be in proportion to the employer's LGPS pensionable payroll).

In the event of an IHER, a short form is provided to Legal and General to make a claim (further details below). Upon accepting a valid claim, Legal and General will then pay the strain cost to the Fund or employer. This will be attributed to the assets of the affected employer as an additional lump sum contribution.

### Summary of benefits of purchasing an ill-health insurance policy

- Protects employers from large and volatile costs.
- Helps stability of employer contribution rates and balance sheets.
- Additional benefits from the policy include access to Legal & General's 24h Employee Assistance Programme as part of cover.

### Ill Health Liability Insurance – policy options

The Fund officers are considering the below policy options for the Fund:

Whole Fund policy – all employers in the Fund would be covered by this policy

Partial Fund policy – all employers except London Borough of Haringey Council ("the Council") would be covered by this policy

Employer choice policies – each employer that decides to insure would have their own individual policy

Further details on the options are set out below.

#### 1. Whole Fund policy

##### What is it?

This is an approach to managing the ill health risk as part of funding strategy whereby the Administering Authority maintains an ill health liability insurance policy on behalf of all of the employers.

##### Premium rate

The Whole Fund policy rate would be £0.88 per £100 of employer's salary roll. This quotation was issued on the 16<sup>th</sup> June 2016 by Legal and General and is valid until 16<sup>th</sup> September 2016. For full details of the terms and conditions relating to this quote, please contact the Fund Officers.

##### Whole Fund policy advantages

- This Fund policy is available at a lower premium rate compared to employer choice and partial fund policies. This is due to the certainty of the employers which will be insured and the likely larger number of employees (volume) being covered.
- As the insurance covers all employers in the fund, the insurer can be more confident that it is not only employers with a high likelihood of larger or multiple claims that are covered. This again allows for a lower premium.

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- The employers do not have to make their own payment arrangement as with individual employer choice policies.
- Claim payments would be paid directly to the Fund, not the employer.

#### **Whole Fund policy challenges**

- Larger employers with available cashflow and low ill health retirement experience may not appreciate this as a benefit as they may be able to effectively self-insure.

### **2. Partial Fund policy**

#### **What is it?**

In line with option 1, this approach again manages the ill health risk as part of funding strategy whereby the Administering Authority maintains an ill health liability insurance policy on behalf of all of the employers except for the Council.

#### **Premium rate**

The Partial Fund policy rate would be £0.95 per £100 of employer's salary roll. This quotation was issued on the 16<sup>th</sup> June 2016 by Legal and General and is valid until 16<sup>th</sup> September 2016. For full details of the terms and conditions relating to this quote, please contact the Fund Officers.

#### **Partial Fund policy advantages**

- This Fund policy is available at a lower premium rate compared to employer choice but the rate is slightly higher than that for the Whole Fund. The reason for this is that the volume of employees being covered is still large but less so than the whole fund option;
- Like the Whole Fund policy, a lower premium is available (compared to employer choice) due to the certainty of the employers being covered.
- The policy will cover all employers except for the Council, ensuring they are safeguarded from the risks that ill health retirement pose.
- The employers do not have to make their own payment arrangement as with individual employer choice policies.
- Claim payments would be paid directly to the Fund, not the employer.

#### **Partial Fund policy challenges**

- If the Council has adverse IHER experience, this may result in volatile cashflows and less cashflow may be available to be used by the Council elsewhere (i.e. there is an opportunity cost).
- The premium rate is more expensive than at Whole Fund because less members are covered.

### **3. Employer choice policies**

#### **What is it?**

Under this approach, individual employers are given the option to take out their own insurance policy with Legal and General.

This would result in multiple policies across the Fund.

#### **How does it work?**

##### **Process to set-up multiple employer choice policies**

A communication exercise would be carried out to request a decision from each employer on whether they wish to set up their own insurance policy. This would typically take the form of an email sent by the Administering Authority with all responses monitored by and queries directed to Hymans' IHLI team to ensure no additional workload for Officers.

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Any employers who opt to take out the insurance would do so independently of the Fund. Insured employers will submit membership data (names, dates of birth, gender, salary) in order for Legal and General to calculate the premium due on an individual employer basis.

For the avoidance of doubt the same premium would be payable for all employers in the Fund.

#### Employer choice claims process

- Claims are the responsibility of the individual employers e.g. they submit their own claims. The forms required to submit a claim are the same as under the Fund policy.
- Once assessed as valid, L&G will pay the claim amount directly to the insured employer, not the Fund.

#### Premium rate

The Employer Choice policy rate would be £1.28 per £100 of employer's salary roll. This quotation was issued on the 16<sup>th</sup> June 2016 by Legal and General and is valid until 16<sup>th</sup> September 2016. For full details of the terms and conditions relating to this quote, please contact the Fund Officers.

#### Employer choice policy advantages

- Reduces the risk of small employers experiencing cashflow problems or going out of business if they have any IHERs as the strain cost will be covered by the insurance.

#### Employer choice policy challenges

- The insurance premium rate is higher under this approach than the Fund policy approach. This is due to the expected smaller insured group, the uncertainty surrounding which employers will opt to take up the cover, and the risk of anti-selection (where employers may be keen to take insurance if they know if their employees are more likely to go off on ill-health).
- The employer would not be obliged to pay the claim amount across to the Fund.
- A number of Funds have opted to take this approach but have found it difficult to get engagement with the smaller employer when these are often most at risk. If one of these employer was to go out of business as a result of an ill health retirement then the debt could fall back to the other fund employers.

#### How the Ill Health Liability Insurance premium affects the contribution rate

There are three approaches the Administering Authority may wish to take with regards to how the insurance premium is charged to employers.

- Do not make any allowance for the IHLI premiums being deducted from the employer contribution rate (premiums would be charged on top of the employer contribution rate)
- Partially allow for the IHLI premium in the contribution rate
- Fully allow for the premium in the contribution rate (i.e. the full amount would be deducted from the employers contribution rate)

An illustration of the three options for an employer who normally pays contributions of £1m and whose IHLI premium would be £50,000 is shown below:

	Fund receives	IHLI Premium	Total paid by employer
Option A	£1,000,000	£50,000	£1,050,000
Option B	£975,000	£50,000	£1,025,000
Option C	£950,000	£50,000	£1,000,000

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Under option A, if the premium were to be charged in addition to current employer contribution rates, then the employers may not find this an attractive option as they are having to pay extra for something they may not feel they require (especially if the claims experience is low).

Under option B, a decision could be made as to how much you wish to partially allow for the IHLI premiums in employer contribution rates. This would be more attractive than option A as the current contribution rate for employers would not increase as much.

Under option C, the premium amount would be offset from the current contribution rate payable (which already includes a margin to reserve for ill health strains). This would be an attractive option for employers as they see no additional cash cost as their combined payment (Pension Fund contribution plus IHLI premium) will remain unchanged.

However, as the cash contributions being paid into the Fund are used to offset deficits, if the premium amount is being offset from the current contribution rate (either partially or fully, options B or C), then:

- there will be less money being paid towards the employer's deficit if there are no or fewer IHLI claims than expected – the money will have been paid for insurance which is not fully claimed on;
- there will be around the same, or more, money being used to pay off deficits if the employer's claims experience in the Fund is reasonable (and IHLI strains are being paid into the Fund). This is because the claim payments are likely to exceed the IHLI premium in such cases.

In practice, for options 1 and 2 (Whole Fund and Partial Fund), it is more common for Funds to pay the premium as an administration expense which is then recouped from the employers at each valuation (i.e. in effect option C) rather than explicitly allow for the premium payments in employer contribution rates (contribution allowance options A and B).

As with any insurance, for a given employer it may prove to be more or less costly depending on its IHLI experience: in turn, this may mean more or less money going to pay off its deficit, compared with the non-insured alternative. However it is worth noting that:

- The differences are likely to be small (the IHLI premium is c.1% of pay, compared to typical employer contribution rates in the Fund of c.25%)
- Whilst some employers will pay more and some pay less towards their deficits, depending on their IHLI experience, the overall Fund experience is likely to even out on average.

#### Effect on cashflow

Based on the draft 2016 London Borough of Haringey Pension Fund accounts, the net cashflow position (excluding transfers in and out of the Fund) is -£1m., i.e. benefit outgo exceeds contribution income by c. £1m p.a. currently.

The table below illustrates the effect on the net cashflow position of the Fund under each IHLI and contribution rate allowance options.

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		Ill Health Liability Insurance Policy Option		
		Option 1	Option 2	Option 3
<b>Ill health liability insurance salary roll</b>		£140m	£40m	£10m
Contribution rate allowance option	<b>Option A</b>	nil	nil	nil
	<b>Option B</b>	-£0.60m	-£0.20m	-£0.06m
	<b>Option C</b>	-£1.20m	-£0.40m	-£0.13m

The above table illustrates the potential changes in cashflow under each IHLI option. It is important to note that this excludes the potential claim payments that would be made by Legal and General if there were any ill health retirements. Were the Fund to have an IHLI policy and any claims were made, claim payments would be paid immediately so there would be an immediate positive cashflow into the Fund. This differs from the current process where the ill health strain may be paid over a significant number of years.

These results above have been calculated to give an approximate indication of the possible net cashflow of the Fund under each IHLI policy and contribution rate allowance option. The figures have been calculated based on the following assumptions:

- Payroll has been estimated from the employee contributions in the 2016 draft accounts, assuming the average employee contribution rate is 6.6%;
- The non-Council employers make up 30% of the whole Fund;
- The take-up of the employer choice option has been assumed to be 25% of the non-Council employers.
- No allowance has been made for the claim payments they Fund may receive from Legal and General if they were to experience any ill health retirements.

### Practicalities

#### Claims process

- A short claim form is required to submit a claim. This has a section for both the employer and employee to complete confirming that ill health retirement has taken place.
- A separate note is provided from the Administering Authority regarding the strain cost amount.
- Once assessed as valid, L&G will pay the claim amount directly to the Fund.

#### Additional information

- The above processes can be tailored to fit the Administering Authority's existing administration processes.
- Unless advised otherwise, all policies automatically renew annually on 1 April - although policies can be cancelled at any time (14 day notice period required).



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**Committee decision**

The Committee is asked to consider the preferred approach to ill health liability insurance on behalf of employers.

1. Set up a Whole Fund ill health insurance policy
2. Set up a Partial Fund ill health insurance policy which covers all employers except for the Council
3. Ask employers to make their own arrangement to insure ill health retirement risk via an individual employer policy that covers their own employees.

It is also asked to consider which option to adopt for allowing for IHLI premiums in employers contributions,

- A. No allowance
- B. Partial allowance
- C. Full allowance



Douglas Green

August 2016

For and on behalf of Hymans Robertson LLP

*The information contained herein should not be construed as advice and should not be considered a substitute for specific advice. Examples given are based on actual LGPS fund data. This paper is written for commercial customers as defined by the Financial Conduct Authority and should not be shared with any other third party without our prior written consent. Hymans Robertson LLP is authorised and regulated by the Financial Conduct Authority and is licensed by the Institute and Faculty of Actuaries for a range of investment business activities. Hymans Robertson LLP accepts no liability for errors, omissions or opinions contained herein nor for any loss howsoever arising from the use of this paper.*

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