

NOTICE OF MEETING

Pensions Committee

TUESDAY, 22ND FEBRUARY, 2011 at 19:00 HRS - CIVIC CENTRE, HIGH ROAD, WOOD GREEN, LONDON N22 8LE.

PLEASE NOTE: THE ADVISOR WILL BRIEF ALL MEMBERS OF THE PENSIONS COMMITTEE PRIOR TO THE MEETING, AT 18:30HRS.

MEMBERS: Councillors Watson (Chair), Adje (Vice-Chair), Gibson, Stennett, Beacham,

Jenks and Wilson

IN ATTENDANCE: Howard Jones, Roger Melling, Michael Jones and Keith Brown

AGENDA

1. APOLOGIES FOR ABSENCE

2. URGENT BUSINESS

The Chair will consider the admission of any late items of urgent business. Late items will be considered under the agenda item where they appear. New items of unrestricted urgent business will be considered under agenda item 9, and new items of exempt urgent business will be considered under agenda item 13.

3. DECLARATIONS OF INTEREST

A member with a personal interest in a matter who attends a meeting of the authority at which the matter is considered must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.

A member with a personal interest in a matter also has a prejudicial interest in that matter if the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgement of the public interest and if this interest affects their financial position or the financial position of a person or body as described in paragraph 8 of the Code of Conduct and/or if it relates to the determining of any approval, consent, license, permission or registration in relation to them or any person or body described in paragraph 8 of the Code of Conduct.

4. MINUTES (PAGES 1 - 4)

To approve the unrestricted minutes of the meeting held on 20th December 2010.

5. 2010 VALUATION AND FUNDING STRATEGY STATEMENT

Report of the Director of Corporate Resources to:

- i) Present the actuary's final report on the actuarial valuation undertaken as at 31st March 2010;
- ii) To present the draft Funding Strategy Statement for the Committee's approval.

TO FOLLOW

6. MYNERS PRINCIPLES COMPLIANCE - ASSESSMENT OF EFFECTIVENESS (PAGES 5 - 10)

Report of the Director of Corporate Resources to present to the Committee a proposed framework for the formal assessment of its effectiveness to enable full compliance with the Myners Principles.

7. FUND PERFORMANCE UPDATE (PAGES 11 - 24)

Report of the Director of Corporate Resources to:

- i) Consider the latest investment performance data for the Pension Fund and for each of the Fund's investment managers;
- ii) To report on key responsible investment issues using information provided by the Fund Managers and the Local Authority Pension Fund Forum (LAPFF);
- iii) To report on budget monitoring against the Pension Fund budget;
- iv) To report on late payments of contributions to the Pension Fund.

8. PENSIONS ADMINISTRATION STRATEGY (PAGES 25 - 44)

Report of the Assistant Chief Executive, People and Organisational Development, to approve the implementation of a Pensions Administration Strategy.

9. NEW ITEMS OF UNRESTRICTED URGENT BUSINESS

10. EXCLUSION OF PRESS AND PUBLIC

11. EXEMPT MINUTES (PAGES 45 - 46)

To approve the exempt minutes of the meeting of the Pensions Committee held on 20th December 2010.

12. INVESTMENT STRATEGY UPDATE

TO FOLLOW

London N22 8HQ

13. NEW ITEMS OF EXEMPT URGENT BUSINESS

14. DATE OF NEXT MEETING

12th April 2011, 7pm.

Ken Pryor
Deputy Head of Local Democracy and Member
Services
5th Floor
River Park House
225 High Road
Wood Green

Helen Chapman
Principal Committee Coordinator
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Monday, 14 February 2011



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Agenda Item 4

MINUTES OF THE PENSIONS COMMITTEE MONDAY, 20 DECEMBER 2010

Councillors Watson (Chair), Gibson, Stennett, Beacham, Jenks and Wilson

Apologies Councillor Adje

Also Present: Keith Brown, Howard Jones, Michael Jones and Roger Melling

| MINUTE NO. | | ACTION BY |
|---------------|--|--------------|
| PRPP15. | APOLOGIES FOR ABSENCE | |
| | Apologies for absence were received from Cllr Adje. | |
| PRPP16. | URGENT BUSINESS | |
| | There were no items of urgent business. | |
| PRPP17. | DECLARATIONS OF INTEREST | |
| | Cllr Watson declared a personal interest as a deferred member of the Haringey Pension Scheme. | |
| | Michael Jones declared a personal interest as a pensioner member of the Haringey Pension Scheme. | 7 |
| | Cllr Wilson declared a personal interest as an employee of the National Association of Pension Funds. | |
| | Cllr Jenks declared a personal interest as a current member of the Haringey Pension Scheme. Cllr Jenks also declared a personal interest as a member of the Friends of Cooperscroft, a care home owned by TLC Group Ltd, one of the scheduled and admitted bodies of the Fund. | t |
| | Roger Melling declared a personal interest as a pensioner member of the Haringey Pension Scheme. | 7 |
| PRPP18. | MINUTES | |
| | RESOLVED | |
| | That the unrestricted minutes of the meeting of the Pensions Committee held on 1 November 2010 be approved and signed by the Chair. | |
| PRPP19. | FUND PERFORMANCE REPORT | |
| | The Committee considered a report on the performance data for the Pension Fund and the Fund's investment managers, key responsible investment issues using information provided by the Fund Managers and | : |

MINUTES OF THE PENSIONS COMMITTEE MONDAY. 20 DECEMBER 2010

the Local Authority Pension Fund Forum (LAPFF), budget monitoring against the Pension Fund budget and late payment of contributions.

In response to a suggestion from the Committee, it was agreed that responsible investment issues should also be monitored in respect of Legal and General in future reports. It was noted that further to the production of the report, the situation with regards to late payments had improved since letters to address this issue had been sent out.

RESOLVED

- i) That the Fund performance position as at end of September 2010 be noted.
- ii) That the responsible investments information provided be noted.
- iii) That the pension fund budget monitoring position be noted.
- iv) That the late payments of contributions be noted.

PRPP20. | RESULTS OF ACTUARIAL VALUATION

Bryan Chalmers, the Fund's Actuary, presented the summary of the results of the 2010 Actuarial Valuation of the Fund to the Committee, covering events since 2007, the proposed approach for 2010, assumptions, initial results and conclusions. Mr Chalmers then answered questions from the Committee.

In response to a question from the Committee regarding the basis on which the 6.1% investment return assumption was made, Mr Chalmers reported that this incorporated an assumed 6.5% equity return, on the basis on a 2% equity risk premium. Mr Chalmers reported that a best assumption would be a 3% equity risk premium, which would lead to a 7.5% return. The Committee noted that when cross-referencing the reports of Hymans Robertson and Aon Hewitt it was important to ensure that the figures were comparable; based on the information provided by the actuary, it was suggested that the higher return assumption of 7.5% should be used for comparison purposes with the report provided by Aon Hewitt.

RESOLVED

That the content of the report be noted and the assumptions set out by the Fund's actuary in his report for the 2010 valuation be agreed.

PRPP21. NEW ITEMS OF UNRESTRICTED URGENT BUSINESS

There were no new items of unrestricted urgent business.

PRPP22. EXCLUSION OF PRESS AND PUBLIC

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MINUTES OF THE PENSIONS COMMITTEE MONDAY, 20 DECEMBER 2010

| | RESOLVED | |
|---------|---|--|
| | That the press and public be excluded for the remainder of the meeting. | |
| PRPP23. | EXEMPT MINUTES | |
| | RESOLVED | |
| | That the exempt minutes of the meeting held on 1 November 2010 be approved and signed by the Chair. | |
| PRPP24. | INVESTMENT STRATEGY | |
| | The Committee discussed the report presented by Aon Hewitt. | |
| | RESOLVED | |
| | That the content of the report be noted. | |
| PRPP25. | NEW ITEMS OF EXEMPT URGENT BUSINESS | |
| | There were no new items of exempt urgent business. | |
| PRPP26. | DATE OF NEXT MEETING | |
| | Tuesday, 22 February, 2011. | |

COUNCILLOR RICHARD WATSON

Chair

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Agenda item:

4.2

| Pensions Committee | On 22 nd February 2011 | | | |
|---|---|--|--|--|
| Report Title. Myners Principles complian | ce – assessment of effectiveness | | | |
| Report of Director of Corporate Resource | :es | | | |
| Signed: J. Pawer 11/211 | | | | |
| Contact Officer: Nicola Webb – Corporate Finance Telephone 020 8489 3726 | | | | |
| Wards(s) affected: All Report for: Non Key Decision | | | | |
| | oposed framework for the formal assessment compliance with the Myners Principles. | | | |
| 2. Introduction by Cabinet Member 2.1 Not applicable. | | | | |
| State link(s) with Council Plan Priorities and actions and / or other Strategies: 3.1. Not applicable. | | | | |
| 4. Recommendations4.1 That the Committee approve the assessment of it's effectiveness. | proposed framework for the formal | | | |

That the Committee determine if they wish to make the assessment as a group at the meeting on 12th April 2011 or individually in advance of that meeting.

5. Reason for recommendations

5.1. To ensure that the Committee is able to record the result of it's assessment in the 2010/11 Annual Report and report full compliance with the Myners Principles on investment.

6. Other options considered

6.1. Not applicable.

7. Summary

7.1 A proposed framework is presented which provides members with information and data and the facility for members to award a score in a number of areas along with the ability to record areas for future development. The Committee is asked to consider whether to complete this individually for collation or as a group.

8. Head of Legal Services Comments

8.1 The Head of Legal Services has been consulted on the content of this report. The approval of the assessment framework indicated by the recommendation will assist the administering authority in complying with its duty under the provisions of Regulation 12(3) of the LGPS (Management and Investment of Funds) Regulations 2009.

9. Equalities & Community Cohesion Comments

9.1. There are no equalities issues arising from this report.

10. Consultation

10.1. Not applicable.

11. Service Financial Comments

11.1 Completion of a formal assessment on an annual basis is considered to be good practice and will ensure the Pension Fund complies with the Myners Principles.

12. Use of appendices

12.1 Appendix 1: Proposed assessment framework

13. Local Government (Access to Information) Act 1985

Statement of Investment Principles report to Pensions Committee 21st June 2010

14. Background

- 14.1 At the Pensions Committee meeting on 21st June 2010, the Committee approved a revised Statement of Investment Principles, which included the level of compliance with the Myners Principles on investment, as required by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. The only area of non-compliance was the lack of a formal assessment of the Committee's effectiveness and therefore the absence of reporting on it in the Pension Fund's Annual Report. This was recorded as a development area in the Statement of Investment Principles document.
- 14.2 It was agreed at the meeting that the Committee would undertake a formal assessment of it's effectiveness during 2010/11 to be able to include the results in the 2010/11 Annual Report. Members asked officers to provide a suggested framework to facilitate their assessment.

15. Assessment Framework

- 15.1 The Myners Principle relating to performance assessment states:
 - "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."
- The suggested framework shown at Appendix 1 is therefore designed for members of the Committee to complete either individually to be collated into an overall assessment, or complete together as a group. The Committee is asked to consider how they wish to make the assessment.
- 15.3 The framework is split into five key areas to cover a range of issues:
 - Attendance statistics
 - Training undertaken
 - Achievement of the business plan
 - Monitoring of decisions taken
 - Compliance with best practice and statutory guidance

It has been designed with a section for officers to provide information or data for members to assist in the completion of their assessment section. In the assessment section, there is space for a score (between 5 for excellent and 1 for poor) and a space to provide comments or note areas for further development.

- 15.3 It is proposed that the statement in the Annual Report states the result of the assessment (between Excellent and Poor) and notes any areas identified for further development in the future.
- 15.4 The Annual Report needs to be prepared before the end of June to meet the statutory timescale and so the assessment will need to be completed at or before the next meeting of the Committee on 12th April 2011.

Pensions Committee assessment of effectiveness as a decision-making body

| | Measure of | Information provided by officers | Commit | Committee members' assessment |
|-----------------------------|--|---|--------|---|
| | enectiveness | | Score* | Comments & proposed areas for development |
| 1. Attendance Statistics | Average % of Committee members present at each formal meeting | Average % 15 th April to 20 th December 2010; 5 meetings: 80% | | |
| 2. Training undertaken | Training sessions held during the year relevant to the business of the Committee | Introductory training – June 2010 Elements of training within investment strategy workshops – October and November 2010 | | |
| 3. Business Plan | Areas of work identified in the business plan have been covered during the year | Business Plan identified: Governance – review of Statement of Investment Principles and Funding Strategy Statement – undertaken in June 2010 and February 2011 respectively Investments - strategy review – on-going throughout 2010/11 Funding – review of valuation results – undertaken in December 2010 | | |

| | Measure of | Information provided by officers | Commit | Committee members' assessment |
|---|---|--|--------|---|
| | effectiveness | | Score* | Comments & proposed areas for development |
| Plan continued | | Accounting – review 2009/10 draft accounts and audit report – draft reviewed in June 2010 and audit report reviewed in September 2010 Administration – review annual report on administration – 2010/11 review to reported in June 2011 | | |
| 4. Monitoring of decisions | Data reviewed regularly to inform decisions | Data provided in quarterly update reports: Fund manager performance Cash investment Budget monitoring Responsible investment activity | | |
| 5. Compliance with best practice and statutory guidance | Comply with Governance Compliance Statement Guidance and Myners Principles | Full compliance with Governance Compliance Statement statutory guidance – reported in Annual Report. Compliance with Myners Principles reported in June 2010 with exception of members' assessment of effectiveness. | | |

* Score 1-5 where 5 is excellent, 4 is good, 3 is average, 2 is below average, 1 is poor.



Agenda item:

| Pensions Committee | On 22 February 2011 | | | |
|--|--|--|--|--|
| | | | | |
| Report Title. Fund Performance update | | | | |
| Report of Director of Corporate Resource | es | | | |
| Signed: J. Pare 10/2/11 | | | | |
| Contact Officer: Nicola Webb – Corporate Finance Telephone 020 8489 3726 | | | | |
| Wards(s) affected: All Report for: Noting | | | | |
| Purpose of the report | | | | |
| 1.1. To consider the latest investment for each of the Fund's investment | t performance data for the Pension Fund and managers. | | | |
| 1.2. To report on key responsible invented the Fund Managers and the Loca | .2. To report on key responsible investment issues using information provided by the Fund Managers and the Local Authority Pension Fund Forum (LAPFF). | | | |
| 1.3. To report on budget monitoring ag | .3. To report on budget monitoring against the Pension Fund budget. | | | |
| 1.4. To report on late payments of contributions to the Pension Fund. | | | | |
| 2. Introduction by Cabinet Member | | | | |
| 2.1 Not applicable. | | | | |
| State link(s) with Council Plan Prioriti 3.1. Not applicable. | es and actions and /or other Strategies: | | | |

4. Recommendations

- 4.1 That the Fund performance position as at end of December 2010 be noted.
- 4.2 That the responsible investments information provided be noted.
- 4.3 That the pension fund budget monitoring position be noted.
- 4.4 That the late payments of contributions be noted.

5. Reason for recommendations

5.1. This report is for noting.

6. Other options considered

6.1. Not applicable.

7. Summary

- 7.1 The investment return achieved in the quarter to December 2010 was 5.24%, which was 0.57% behind the benchmark and 0.98% behind the target. The Fidelity bonds portfolio is the only one to have met or exceeded the target since the inception of the investment strategy in April 2007.
- 7.2 The budget monitor shows an overall variance of £6.55m at the end of December 2010, mainly due to the change in the timing of contributions paid by the Council to the Pension Fund.

8. Head of Legal Services Comments

8.1 The Head of Legal Services has been consulted on the content of this report. There are no specific legal comments on the report which is for noting.

9. Equalities & Community Cohesion Comments

9.1. There are no equalities issues arising from this report.

10. Consultation

10.1. Not applicable.

11. Service Financial Comments

- 11.1 Performance of the Fund Managers continues to be carefully monitored in the current market conditions. The investment strategy of the Fund is being reviewed during this year, which will address the performance issues.
- 11.2 The switch to the separate Pension Fund bank account in October has resulted in a change to the timing of the payment of the Council's contributions into the Fund. This has impacted on the budget monitoring position at the end of December 2010, but will be fully accounted for in the year end accounts.

12. Use of appendices /Tables and photographs

- 12.1 Appendix 1: Fund holdings and top ten equity holdings.
- 12.2 Appendix 2: Fund performance to 31 December 2010.
- 12.3 Appendix 3: Responsible Investment update.
- 12.4 Appendix 4: Budget Management: monitoring to 31 December 2010.

13. Local Government (Access to Information) Act 1985

Northern Trust performance monitoring reports.

Fund performance update report to Pensions Committee on 20th December 2010.

14. Previous Quarter Investment performance

- 14.1 The investment performance of the Pension Fund was last reported to Pensions Committee in December 2010. That report covered the period up to 30 September 2010, at which time the following points were noted:
 - Since monitoring against the new benchmark commenced on 1 April 2007, the combined Haringey fund had increased slightly in absolute terms by 0.45% per cent up to 30 September 2010, underperformed the gross benchmark by 2.26% and also underperformed the gross target by 3.90%.
 - The performance by the Fund Managers over the same period was as follows:
 - Fidelity's Bond mandate out performed the gross target by 0.92% and the Equity mandate under performed the gross target by 2.08%.
 - Capital's Equity and Bond mandates were below target by 3.00% and 1.65% respectively.
 - ING were below target by 1.96%.

- 15. Total Fund investment performance for quarter to 31st December 2010
- 15.1 The current investment strategy was implemented on 1st April 2007 and so all the performance figures which follow show performance since that date.
- 15.2 Performance of the combined Haringey fund compared to benchmark and target for the three months to end of December 2010 and annualised performance from 1 April 2007 to end of December 2010 are shown below. The target is shown gross of Fund Managers fees and assumes that returns above benchmark are achieved evenly throughout the year.

| | 3 months to end of Dec 2010 | 1 April 2007 to 31 Dec 2010 |
|------------------------------|--------------------------------|--------------------------------|
| | | (annualised) |
| | % | % |
| Overall fund performance | 5.24 | 1.80 |
| Benchmark | 5.81 | 4.04 |
| Performance versus benchmark | (0.57) | (2.24) |
| Overall fund performance | 5.24 | 1.80 |
| Target | 6.22 | 5.68 |
| Performance versus target | (0.98) | (3.88) |

- 15.3 This shows that in the period to 31st December 2010:
 - The annualised performance of the combined Haringey fund since 1 April 2007 was a small increase in absolute terms of 1.80%, the fund under performed the benchmark by 2.24% and under performed the target by 3.88%;
 - The annualised position has improved very marginally since the report to the last meeting with the under performance versus target decreasing from (3.90%) to (3.88%).
- The cash held in-house has been invested in line with the Treasury Management Strategy Statement for 2010/11 see the cash management section below.
- 15.5 Appendix 1 shows how the value of the Fund was split into the various types of investments at the end of December 2010 and for comparison the end of the previous quarter. The top ten equity holdings include the whole of the Fund's exposure to equities including both directly held shares and those in pooled funds.

16. Fund Manager Performance

- Appendix 2 shows investment performance to the end of December 2010 for each Fund Manager, compared to benchmarks and targets as supplied by the custodian, Northern Trust. The data covers the period since 1 April 2007 when the current investment strategy was implemented.
- The performance targets for each Fund Manager's mandate are shown below together with the fund managers' performance against those benchmarks since 1 April 2007 when the strategy was implemented. The contract with Legal & General has been in place for less than two years and so long term performance data is not available. However their portfolio is invested in line with the benchmark, so the variation from the benchmark is minimal. The variation has amounted to +0.06% since the contract started.
- There have been 52 calls on the Pantheon Asia, Europe and USA funds totalling £19.9 million to date. There have been no distributions yet. Private equity is a long term asset class and therefore performance numbers are excluded as they are not considered meaningful when the funds are still in the drawdown phase.
- 16.4 Targets are set out in the table below and are gross of fees.

| | % Target above benchmark | % annualised performance above / (below) benchmark in the period 1 Apr 07 to 31 Dec 10 | % annualised performance above/ (below) target in the period 1 Apr 07 to 31 Dec 10 |
|---------------------------|--------------------------------|---|--|
| Capital - equities | 2.0 | (1.03) | (3.03) |
| Capital - bonds | 1.0 | (0.74) | (1.74) |
| Fidelity - equities | 1.7 | 0.13 | (1.57) |
| Fidelity - bonds | 0.6 | 1.40 | 0.80 |
| ING - property | 1.0 | (1.10) | (2.10) |
| Pantheon – private equity | 0.75 | N/A | N/A |

The latest quarterly meetings took place in February 2010 between each active Fund Manager and the Head of Finance: Treasury & Pensions. A summary of the key issues discussed at those meetings is set out below.

Capital International

- o Performance to date.
- Future outlook for markets.
- Review of Responsible Investment issues.

Fidelity

- Performance to date.
- Future outlook for markets.
- Review of Responsible Investments Issues.

ING

- Performance to date.
- Volatility in the property market and future estimated returns.

Pantheon

- Performance to date.
- Future outlook for markets.
- Future pattern of cash flows.

17. Conclusions

- 17.1 Since monitoring against the benchmark commenced on 1 April 2007, the annualised performance of the combined Haringey fund has shown a small increase in absolute terms of 1.80% up to 31 December 2010. During this period the Fund under performed the gross benchmark by 2.24% and under performed the gross target by 3.88%.
- 17.2 Capital and ING are underperforming against both the benchmark and the target. Fidelity have outperformed the benchmark and target in the bonds portfolio, but the equity portfolio performance has been below both the benchmark and target.
- 17.3 Investment returns in the equity markets were positive in the quarter, but in bond markets the returns were negative. There are a number of ongoing issues which are likely to impact on future performance, and the situation will continue to be monitored carefully. These include:
 - Sovereign debt issues, particularly in the Eurozone;
 - The price of oil and commodities;
 - The trends of inflation and risks of deflation;
 - Interest rates;
 - Property prices and rental values.

18. Responsible Investments

- At Pensions Committee on 23 June 2008 a review of the Fund's Responsible Investment Policy was considered and agreed by members. One of the recommendations was that officers monitor the fund managers' approach to the revised Responsible Investment Policy. The Fund is a member of the Local Authority Pension Fund Forum (LAPFF) which provides information about responsible investment issues and undertakes engagement with companies on these issues on behalf of local authorities.
- Appendix 3 compares responsible investment information provided by the Council's three equity Fund Managers for the quarter ending 31 December 2010 with the information supplied by LAPFF over the same time period. This highlights engagement work on environmental and governance issues.

19. Budget Management

- The budget monitoring analysis to the end of December 2010 is shown in detail in Appendix 4. In overall terms the variance was £6.55m
- 19.2 The significant variances to date are:
 - Since the introduction of the separate Pension Fund bank account in October 2010, contributions from the Council to the Fund are paid only when they become due in the month following deduction from salaries, rather than being automatically transferred. This means that there is one month's worth less contributions than budgeted for, which amounts to £3.5m. This will be fully accounted for in the year end accounts.
 - Transfers in and out of the Fund continue to be volatile, as the volume and timing varies throughout the year;
 - Investment income was £3.2m less than budgeted as the value of dividends paid by companies continues to remain low in the current economic climate;
 - Investment management expenses are significantly lower than budgeted at this stage in the year due to the timing of the receipt of invoices from fund managers.

20. Cash Management

- 20.1 The Pension Fund is holding cash in-house for a number of reasons:
 - Funding property investments it was agreed in 2007 at the last investment strategy review to increase the allocation of the Fund to property. An amount of £18m was invested in cash to fund this. The balance still to be drawn down is £1.4m.
 - Funding private equity investments at the last investment strategy review it was agreed that in addition to the original allocation, £10m a year be allocated

- to private equity and that this should be funded from cash surpluses and kept in cash pending drawdown. To date £19.9m has been drawn down and £15.7m remains in cash.
- Reduction in bond holdings at the Committee meeting on 15th April 2010, it
 was decided to reduce the Fund's holdings in bonds and invest in cash.
 Bonds were sold and cash of £29.5m was transferred to the in-house account.
- 20.2 The elements of the cash invested in-house at the end of December 2010 can be summarised as follows:

| Property allocation | £1.4m |
|--|--------|
| Private equity allocation | £15.7m |
| Sale of bonds | £29.5m |
| Other surplus of contributions over benefits | £15.6m |
| Total | £62.2m |

The table below shows key statistics, which are used for the Council's treasury management reporting, applied to the pension fund cash investments during the quarter. Descriptions of the statistics are provided below:

| | | Q 30 Jun | Q 30 Sept | Q 31 Dec |
|---|----------------------------------|----------|-----------|----------|
| Α | Credit score – value weighted | 2.88 | 3.55 | 3.69 |
| В | Credit score – time weighted | 4.12 | 4.26 | 4.27 |
| С | Weighted Average Maturity (days) | 81 | 85 | 91 |
| D | Interest Rate earned | 0.64% | 0.65% | 0.75% |

<u>A & B:</u> These measures score credit risk on a scale of 0 to 10 on both a value weighted and a time weighted basis and the table below demonstrates how to interpret the scores:

| Above target | AAA to AA+ | Score 0 - 2 |
|--------------|------------|--------------|
| Target score | AA to A+ | Score 3 - 5 |
| Below target | Below A+ | Score over 5 |

- <u>C:</u> This is a measure of how liquid the portfolio is. It shows the weighted average maturity of the fixed term deposits. In addition the Fund holds instant access funds in money market funds.
- <u>D:</u> This is the interest rate earned in the quarter on the deposits placed.
- The statistics show that the cash is invested in highly rated institutions with an average maturity of 91 days, up slightly from 85 days at the end of the previous quarter. This level of liquidity allows the Pension Fund to pay drawdowns to the property and private equity managers as required while investing long enough to achieve a reasonable rate of return. 0.75% was the rate earned which was 0.25% higher than the Bank of England base rate.

21. Late payment of contributions to the Pension Fund

- 21.1 It was agreed by the Committee at the last meeting that those employers paying contributions after the deadline of no more than 19 days after the end of the month in which they were deducted, would be reported in this report on a quarterly basis.
- 21.2 The table below shows the late payment of contributions relating to the period October to December 2010:

| | Occasions late | Average Number of days late | Average monthly contributions |
|--------|-------------------|-----------------------------------|-------------------------------|
| Europa | 2 | 22 | £800 |
| TLC | 3 | 4 | £6,300 |

21.3 Europa is in a transition phase of handing over their contract to their parent company and it is anticipated the situation will improve at that point. Officers have written again to TLC and will continue to press the issue with the backing of the Pensions Administration Strategy. The amounts of interest due as a result of these delays total less than £5 and therefore it remains uneconomic to invoice the employers for this. The situation will continue to be monitored and reported back to the Committee.

Appendix 1

a) Fund Holdings

| | As at 31 I | December 201 | 0 | As at 30 S | eptember 2 | 010 |
|--|---------------------|------------------|--------------|--------------------|------------------|-----------|
| Fund Holdings | Market Val £'000 | ue | % of Fund | Market Va £'000 | lue | % of Fund |
| UK equities held in individual shares held in pooled funds | 36,019 155,477 | 191,496 | 27.1% | 37,210 143,154 | 180,364 | 26.7% |
| Overseas equities held in individual shares held in pooled funds | 95,581 159,067 | 254,648 | 36.1% | 85,010 145,167 | 230,177 | 34.1% |
| Bonds held in individual bonds held in pooled funds | 27,558 99,071 | 126,629 | 18.0% | 27,882 101,283 | 129,165 | 19.2% |
| Property Private Equity | 49,513 17,802 | 49,513 17,802 | 7.0% 2.5% | 47,475 18,818 | 47,475 18,818 | 2.8% |
| Cash held by Fund Managers held in-house | 3,337 62,201 | 65,538 | 9.3% | 2,750 66,283 | 69,033 | 10.2% |
| Totals | | 705,626 | 100.0% | | 675,032 | 100.0% |

b) Top Ten equity shares - held directly and in pooled funds

| | | As at | t 31 December | 2010 |
|--------------------------|-----------------|-------|---------------|--------------|
| | | | Percentage | |
| Company | Sector | Rank | of Equities | Market Value |
| | | | % | £m |
| Royal Dutch Shell | Oil & Gas | 1 | 3.29% | 14.70 |
| HSBC | Banks | 2 | 2.40% | 10.70 |
| Vodafone | Telecomms | 3 | 2.11% | 9.41 |
| BP | Oil & Gas | 4 | 1.77% | 7.90 |
| Glaxosmithkline | Pharmaceuticals | 5 | 1.50% | 6.69 |
| BG Group | Oil & Gas | 6 | 1.46% | 6.53 |
| Rio Tinto | Mining | 7 | 1.31% | 5.83 |
| BHP Billiton | Mining | 8 | 1.28% | 5.70 |
| Astrazeneca | Pharmaceuticals | 9 | 1.05% | 4.69 |
| British American Tobacco | Tobacco | 10 | 0.98% | 4.37 |

Appendix 2 Fund Performance to 31st December 2010

| Gross of Fees | | | | | | | | | | | | |
|---------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|--|---|----------------------------------|--|---|---|--|--|
| | Market valuations 31.03.08 | Market valuations 31.03.09 | Market valuations 31.03.10 | Market valuations 31.12.10 | Weighted % Fund change 1 Oct to 31 Dec 2010 | % benchmark change 1 Oct to 31 Dec 2010 | % target 1 Oct to 31 Dec 2010 | Under (-)/over (+) performance versus target 1 Oct to 31 Dec 2010 | Weighted % Fund change 1 April 2007 to 31 Dec 2010 | % benchmark change 1 April 2007 to 31 Dec 2010 | % target 1 April 2007 to 31 Dec 2010 | Under (-)/over (+) annualised performance versus target 1 April 2007 to 31 Dec 2010 |
| | €,000 | £,000 | £,000 | 000,3 | % | % | % | % | % | % | % | % |
| Capital -Equities | 125,246 | 609'56 | 139,785 | 150,224 | 8.47 | 8.71 | 9.21 | (0.74) | 3.56 | 4.59 | 6.59 | (3.03) |
| Capital -Fixed Income | 62,451 | 63,111 | 70,923 | 44,427 | (1.51) | (66.0) | (0.74) | (0.77) | 5.46 | 6.20 | 7.20 | (1.74) |
| Fidelity -Equities | 126,566 | 98,171 | 144,909 | 152,482 | 10.47 | 8.53 | 96.8 | 1.51 | 4.46 | 4.33 | 6.03 | (1.57) |
| Fidelity - Fixed Income | 062'390 | 64,390 | 77,481 | 82,361 | (2.03) | (2.03) | (1.88) | (0.15) | 7.79 | 6:39 | 6.99 | 08.0 |
| Bernstein -UK Equity | 117,805 | 71,622 | 1 | , | • | , | • | 1 | , | , | 1 | ı |
| Bernstein -Global Equity | 28,299 | 18,875 | , | , | ı | , | 1 | , | 1 | | ı | 1 |
| L & G-UK Equity | • | • | 108,949 | 117,027 | 7.37 | 7.38 | 7.38 | (0.01) | • | ı | , | , |
| L & G-Global Equity | 1 | | 28,077 | 29,626 | 9.71 | 69.6 | 69.6 | 0.02 | , | , | 1 | 1 |
| ING | 51,505 | 36,000 | 46,167 | 49,421 | 1.14 | 1.90 | 2.15 | (1.01) | (7.71) | (6.61) | (5.61) | (2.10) |
| Pantheon - private equity | 2,719 | 11,509 | 13,131 | 17,857 | (15.32) | 11.07 | 11.82 | (27.14) | 1 | • | N/A | N/A |
| Total | 579,981 | 459,287 | 629,422 | 643,425 | 5.24 | 5.81 | 6.22 | (86:0) | 1.80 | 4.04 | 5.68 | (3.88) |
| | | | | | | *************************************** | 1 | | | | | |

| 1,358 | | | 15,736 | 45,107 | 705,626 |
|---|-----------------|-----------------------|--------|--------|------------|
| 3,252 | | | 13,174 | 17,504 | 663,352 |
| 9,350 | | | 6,500 | 4,154 | 482,291 |
| 9,350 | | | 9,500 | 544 | 599,375 |
| In house cash - earmarked for property | In house cash - | earmarked for private | equity | Other | Total Fund |

Appendix 3

Comparison of Responsible Investment Activity Quarter ending 31 December 2010 Equity Fund Managers and the Local Authority Pension Fund Forum (LAPFF)

| Fidelity | Capital International | Legal & General | LAPFF |
|--|--|---|--|
| Environmental Issues | | | |
| Fidelity is engaging with a number of power generation companies to determine how the Energy Market Reforms which plan to decarbonise energy generation will impact on them and shareholder value. The reforms are subject to consultation at the present time and the expectation is they will be introduced in 2013. | Capital staff went on a research trip to China recently and took particular note of environmental issues in a number of industries including property development, car manufacturing and steel production amongst others. One specific example is that they have noted that the government is putting in measures to address the small energy inefficient and polluting steel mills. | Legal & General met with Tesco management during the quarter to discuss their progress on carbon reduction and how they plan to meet their aim of being carbon neutral by 2050. | LAPFF is supporting the Carbon Disclosure Project's Water Disclosure initiative which aims to highlight issues around water constraints and water security and encourage companies to put these issues higher on their agendas. |
| Governance / Remuneration Issues | Issues | | |
| Fidelity has voted against the recommendation that Ramsay Health Care's compensation strategy for senior executives be approved in previous years on the basis that no performance targets were set out in the strategy. Following this feedback, the 2010 strategy included performance targets. | Capital met with JP Morgan during the quarter to discuss their compensation policy and other executive pay issues. This was particularly timely in the light of these issues remaining a controversial issue in the media. | L&G attended an investor briefing with Lloyds Banking Group and met with the Chairman to discuss their approach to corporate responsibility following the takeover of HBOS Bank. The areas the Board are looking at include financial inclusion and supporting local communities. | The LAPFF has been engaging with Associated British Foods for some time to address the lack of a company wide approach to corporate responsibility issues. The result of this engagement is that in December 2010 the company presented a corporate responsibility |

| Fidelity | Capital International | Legal & General | LAPFF |
|-------------------------------|---------------------------------|----------------------------|-----------------------------|
| Other Engagement activity | | | |
| During discussions with Oil | Following the Liberty | A meeting was held with | LAPFF are currently |
| Search Ltd, Fidelity explored | International de-merger of it's | Glaxosmithkline to discuss | undertaking a targeted |
| the impact on the local | property business earlier this | their access to medicine | engagement campaign with |
| community and issues of | year, Capital met with the | strategy in emerging | food and drink companies to |
| wealth redistribution arising | chairman of one of the new | markets, which tries to | discuss the risks and |
| from their project in Papua | companies formed as a | balance pricing with | opportunities created by |
| New Guinea. | result. They discussed a | accessibility in these | obesity. |
| | range of issues including | markets. | |
| | corporate governance and | | |
| | diversity. | | |
| | | | |
| 04404 | | | |

Other Issues

UK Investor Stewardship Code

Stewardship Code for Institutional Investors. The aim of the Code is to improve the quality of corporate governance through promoting better dialogue between shareholders and company boards and encouraging more transparency about the way investors oversee companies they own. Fund management firms have been encouraged to sign up to the code and it has been confirmed that Fidelity, Capital International and Legal & General have all published policies showing how they apply In September 2010 it was reported to the Pensions Committee that the Financial Reporting Council published the first the Code.

Appendix 4
Pension Fund Budget Management - monitor at 31st December 2010

| | 2010/11 | Budget to 31 | Actual to 31 Dec | Over/under (-) at | |
|---|-----------------|-------------------|------------------|----------------------|---|
| | Budget £'000 | Dec 2010 £'000 | 2010 £'000 | 31 Dec 2010 £'000 | Explanations of significant variations |
| Income | | | | | |
| Contributions and benefits: | | | | | |
| Employee Contributions | (10,700) | (8,025) | (7,023) | 1,002 | Following the change to a separate Pension Fund bank account the Council contributions are not paid into the Fund |
| Employer Contributions | (36,000) | (27,000) | (24,485) | 2,515 | 2,515 until the month following deduction from salaries. This will be fully accounted for in the year end accounts. |
| Transfer Values Received | (5,100) | (3,825) | (4,348) | (523) | |
| Total income | (51,800) | (38,850) | (35,856) | 2,994 | |
| Expenditure: | | | | | |
| Pensions and other benefits | 30 000 | 22 500 | 23 325 | 825 | |
| Transfer values paid | 5,300 | 3,975 | 5.310 | | Transfer values are very unpredictable in terms of volume and timino |
| Administrative expenses | 800 | 009 | 499 | | |
| Total expenditure | 36 100 | 27 075 | 20 434 | 2.069 | |
| | 20.152 | 2 (5) | 101104 | 200,4 | |
| Net addition from dealings with members | (15,700) | (11,775) | (6,722) | 5,053 | |
| Returns on Investment: | | | | | |
| Investment income | (15,200) | (11,400) | (8,190) | 3,210 | 3.210 Dividends from companies continue to be low. |
| Taxation | 190 | 143 | 114 | (53) | |
| Investment management expenses | 3,300 | 2,475 | 795 | (1,680) | (1,680) The timing of the submission of invoices from fund managers affects this figure. |
| Net return on investments | (11,710) | (8,782) | (7,281) | 1,501 | |

(14,003)

(27,410)

Totals

Agenda item:

| Pensi | ions Committee | On 22 February 2011 | | |
|---|--|---|--|--|
| | A Title. | | | |
| Repor | t Title: Pensions Admini | stration Strategy | | |
| Repor | | ple and Organisational Development | | |
| Signe | d: Stat > | Dated: 11/2/11 | | |
| | Stuart Young Assistant Chief Exec | utive People and Organisational Development | | |
| Conta | ct Officer: I M Benson – Human R Telephone 020 8489 38 | | | |
| Wards | s(s) affected: All | Report for: Non key decision | | |
| | rpose of the report To approve the implementation of | a Pensions Administration Strategy (DAS) | | |
| 1.1 To approve the implementation of a Pensions Administration Strategy (PAS) . | | | | |
| 2. Int | roduction by Cabinet Member | | | |
| 2.1 | Not applicable. | | | |
| 3. Sta | ate link(s) with Council Plan Prioriti | es and actions and /or other Strategies: | | |
| 3.1 | The local government pension and Administering Authorities to publis | scheme regulations provide a discretion to | | |
| 3.2 | The aim of the PAS is to disting | uish those administering authority functions to create a standard set of Service Level | | |

4. Recommendations

- 4.1 That the Council adopt the PAS document attached as Appendix 1 to this report.
- 4.2 That the PAS is reviewed on a triennial basis commencing from 1st April 2014.
- 4.3 That authority is delegated to the Head of Human Resources to develop the PAS within the policy framework approved by this committee, in consultation with the employing bodies and the trade unions.

Reason for recommendations

5.1. Formal approval by the Committee is required to exercise the discretion of the Administering Authority to publish a PAS under Regulation 65 of the Local Government Pension Scheme (Administration) Regulations 2008.

6. Other options considered

6.1. Not applicable.

7. Summary

- 7.1 The scheme regulations give administering authorities the discretion to prepare a PAS policy statement on such matters as:-
 - procedures for liaison and communication with employing bodies
 - establishment of levels of performance
 - compliance with statutory requirements
 - serving notice of unsatisfactory performance
- 7.2 Although admission agreements set out the compliance obligations on employing bodies, there is no agreement setting out performance standards. The PAS addresses this issue Publishing a PAS will assist in improving efficiency, governance and good working relations. This in turn will both raise the profile of the scheme and reduce unnecessary costs.
- 7.3 The administering authority and its employing bodies must have regard to the PAS when carrying out their scheme functions.

8 Head of Financial Services Comments

8.1 There are no costs associated with implementing this strategy. The introduction is a positive step as it provides clarity about respective responsibilities, which should enable the service to improve efficiency. It will also enable the Pension Fund to recover additional costs which arise from employers not meeting their

responsibilities.

9 Head of Legal Services Comments

9. 1 The Head of Legal Services has been consulted concerning the content of this report. The Council as administering authority has the power under Regulation 65 of the LGPS (Administration)Regulations 2008 (as amended) to prepare a pensions admission strategy. Once the authority has determined its strategy, the authority must keep it under review. The content of the proposed strategy meets the requirements contained within Regulation 65(1).

10 Equalities & Community Cohesion Comments

10.1There are no equalities issues arising from this report.

11 Consultation

11.1 The trade unions and employing bodies have been consulted on the draft PAS. The trade unions confirmed they had no comments. There has been no response from the employing bodies.

12 Service Financial Comments

12.1 There are no anticipated costs arising out of the proposals. In fact it is anticipated that over time costs will be managed more effectively through these proposals

13 Use of appendices /Tables and photographs

13.1 Appendix 1 is the draft PAS

14. Local Government (Access to Information) Act 1985

14.1 Local Government Pension Scheme (Administration) Regulations 2011

15. Background

15.1 Regulation 65 of the Local Government Pension Scheme (Administration)
Regulations 2008 allows the Council as the Administering Authority to create a
PAS which sets out the roles and responsibilities of the administering authority
and the employing bodies in administering the LGPS. Regulation 43 allows the
administering to recover costs from the employing bodies resulting from their
underperformance

- The admission agreement sets out both the obligation on employing bodies to provide relevant information to the administering authority and the general requirement to comply with statutory requirements under the scheme. But there is no agreement setting out the expected performance standards around which the provision of data and notifications should operate. The PAS addresses this issue for the benefit of both the administering authority, the employing bodies and ultimately the scheme membership. It also sets the standard by which underperformance can be measured and costs recovered by the administering authority.
- 15.3 The implementation of the PAS has regulatory backing as mentioned above and applies to all current employing bodies listed in Appendix 1 of the PAS document. It will also apply to employing bodies which may be admitted in the future.

16. Aims and Objectives

- 16.1 The aim of the strategy is to define the quality and performance standards expected of all employing bodies participating in the Haringey Council Pension Scheme. The performance standards are set out in Section 3 the PAS document
- The PAS seeks to promote good working relationships and improve efficiency within a framework that is transparent to all and which is reviewed in conjunction with the scheme employers and the trade unions
- As the Council redefines its role as a service provider it is expected that the number of bodies admitted to the fund will increase. At the same time the government's policy of encouraging academy and free schools will also increase the number of admitted bodies. The statutory status of a PAS enhances its status as an important tool in managing the participation of outside bodies in the LGPS.

17. Ensuring compliance and good governance

- 17.1 Ensuring compliance is the responsibility of both the administering authority and the employing bodies. The PAS formalises procedures that are currently in place to ensure that employers are kept up to date with scheme changes, training opportunities and are provided with templates and documents to assist them in providing data and publishing information for which they have responsibilities.
- 17.2 The London Borough of Haringey Pension Fund is subject to annual audit of its processes and internal controls. The PAS will be a reference for auditors carrying out this function. Employing bodies are expected to comply with requests for information from both internal and external auditors. Any consequent recommendations made will be considered by the Council and implemented following consultation as necessary.

- 17.3 Performance will be monitored against specific tasks e.g. timely payment of contributions and provision of data for starters and leavers. There will be close liaison with employing bodies to ensure that agreed performance standards are met. An annual report will be submitted in Q2 of each year for the scheme as a whole including the performance of the administering authority. Concerns regarding an individual employer will be reported as and when required.
- 18 Levying costs for poor performance
- 18.1 Regulation 43 of the LGPS (Administration) Regulations 2008 provides that an administering authority may recover any additional costs associated with the poor level of performance by an employing body. Details of the approach to be taken by the Council are set out in Section 5 of the PAS document
- Where persistent under performance is identified, every effort will be made to assist the employing body in addressing the causes of the poor performance.

 Only when all opportunities to improve performance are exhausted will action be initiated to recover costs.



LOCAL GOVERNMENT PENSION SCHEME LONDON BOROUGH OF HARINGEY

Pension Administration Strategy Statement

DD/MM /2009



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INTRODUCTION

This is the Pension Administration Strategy Statement of the London Borough of Haringey Pension Fund, administered by the London Borough of Haringey Council (the administering authority). It has been developed following consultation with employers who participate in the London Borough of Haringey Pension Fund and schools who employ their own Payroll Providers..

This strategy statement sets out the performance standards expected of the Council in its role of administering authority and scheme employer, as well as all other scheme employers and school payroll providers within the London Borough of Haringey Pension Fund. It seeks to promote good working relationships, improve efficiency and ensure quality amongst the scheme employers and school payroll providers and the administering authority and sets out details on how performance levels will be monitored and the action that might be taken where persistent failure occurs.

The Fund comprises 15 scheme employers and approximately (20,500) scheme members (as at March 2009) The efficient delivery of the benefits of the LGPS is dependent on reliable administrative procedures being in place between the administering authority and scheme employers. The scheme employers who participate in the London Borough of Haringey Pension Fund are included in the appendix to this strategy.

It is effective from dd mm yyyy.

Any enquiries in relation to this pension administration strategy statement should be sent to:

| Pensions Administration issues: | Pension Fund Accounts /Investment/Governance |
|---------------------------------|--|
| I M Benson | Nicola Webb |
| Pensions Manager | Head of Finance Treasury and Pensions Team |
| Haringey Council | Haringey Council |
| Alexandra House | Alexandra House |
| 10 Station Road | 10 Station Road |
| London N22 7TR | London N22 7TR |
| Telephone: 020 8489 3826 | Telephone 020 8489 3731 |
| · | |
| | |

1. REGULATORY FRAMEWORK

Regulation 65(1) of the Local Government Pension Scheme (Administration) Regulations 2008 enables the Council as the Administering Authority to prepare a document ("the pension administration strategy") which contains such of the matters mentioned below as it considers appropriate:-

- Procedures for liaison and communication with their relevant employing authorities
- The establishment of levels of performance which the administering authority and the relevant employing authorities are expected to achieve in carrying out their functions under the LGPS by-

- (i) the setting of performance targets;
- (ii) the making of agreements about levels of performance and associated matters; or
- (iii) such other means as the administering authority consider appropriate;
- Procedures which aim to secure that the administering authority and the relevant employing authorities comply with the statutory requirements in respect of those functions and with any agreement about levels of performance.
- Procedures for improving the communication by the administering authority and the relevant employing authorities to each other of information relating to those functions.
- The circumstances in which the administering authority may consider giving written notice to a relevant employing authority on account of that employer's unsatisfactory performance in carrying out its functions under these Regulations when measured against established levels of performance.
- Such other matters as appear to the administering authority to be suitable for inclusion in that strategy.

In addition, the regulation 65(6) of the Administration Regulations also requires that, where a pension administration strategy is produced, a copy is issued to each of their relevant employing authorities as well as to the Secretary of State. Similarly, when the strategy is revised at any future time the administering authority (after say a material change to any policies contained within the strategy) must notify all of its relevant employing authorities and also the Secretary of State.

It is a requirement that, in preparing or revising any pension administration strategy, that the administering authority must consult its relevant employing authorities and such other persons as it considers appropriate.

Regard must be had by both the administering authority and employing authorities to the current version of any pension administration strategy when carrying out their functions under the LGPS Regulations.

In addition, regulation 43 of the Administration Regulations allows an administering authority to recover additional costs from a scheme employer where, in its opinion, they are directly related to the poor performance of that scheme employer. Where this situation arises the administering authority is required to give written notice to the scheme employer, setting out the reasons for believing that additional costs should be recovered, the amount of the additional costs, together with the basis on which the additional amount has been calculated.

The following strategy statement, therefore, sets out the information required in accordance with regulation 65(1) and forms the basis of the day to day relationship between the London Borough of Haringey as the administering authority and the employing authorities of the London Borough of Haringey Pension Fund. It also sets out the circumstances under regulation 43 where additional costs incurred as a result of the poor performance of a scheme employer might be recovered, together with the steps that would be taken before any such action were taken.

RESPONSIBILITIES AND PROCEDURES

PROCEDURES FOR LIAISON AND COMMUNICATION WITH EMPLOYERS

The Council has published a number of documents covering procedures and policy statement. These include the following:

- Administering Authority discretions
- Guide for employers and Payroll Providers.
- Communication Policy Statement
- Governance Compliance Statement
- Responsible Investment Policy
- Statement of Investment Principles
- Funding Strategy Statement
- Annual Report

These policy statements can be viewed on the Pensions Web Page (www.haringey.gov.uk/pensionfund)

The Council is concerned to ensure the full participation of the employing bodies in the efficient management of the Fund. Both the Council and the Employing Bodies have a joint role and responsibility to ensure that a high quality cost effective service is provided to scheme members and other stakeholders in the Local Government Pension Scheme. The Administration Strategy Statement sets out a framework which will assist all involved in achieving this objective.

Employing Bodies also have a responsibility to formulate and publish a policy statement on the use of employer discretions e.g early and flexible retirements. These policy statements must be kept under review.

This strategy statement has been developed following consultation with scheme employers and other interested parties. It takes account of scheme employers' current pension knowledge, perception of current administration standards and specific training needs to ensure the level of service can be delivered to the standard required by the London Borough of Haringey Pension fund and set out in this statement.

ESTABLISHING LEVELS OF PERFORMANCE

Performance standards

The LGPS regulations require that certain decisions be taken by either the administering authority or the scheme employer, in relation to the rights and entitlements of individual scheme members. In order to meet these obligations in a timely and accurate manner, and also to comply with overriding disclosure requirements, the London Borough of Haringey Fund has agreed levels of performance between itself and scheme employers which are set out below:

Overriding legislation

In carrying out their roles and responsibilities in relation to the administration of the Local Government Pension Scheme, the administering authority and scheme employers will, as a minimum, comply with overriding legislation, including:

- Pensions Act 1995 and associated disclosure legislation;
- Freedom of Information Act 2000:
- Age Discrimination Act 2006;
- Data Protection Act 1998:
- Disability Discrimination Act 1995;

- Finance Act 2004; and
- Health and Safety legislation
- TUPE Transfers Pensions Act 2004, especially sections 257 and 258
- The Transfer of Employment (Pensions Protection) Regulations 2005 (SI 2005/649).

Where agreed, the administering authority and scheme employers will comply with local standards which go beyond the minimum requirements set out in overriding legislation. Such best practice standards are outlined in the section on timeliness set out below.

Internal standards

The administering authority and scheme employers will ensure that all functions/tasks are carried out to agreed quality standards. In this respect the standards to be met are:

- Compliance with all requirements set out in the employer procedural guide;
- Work to be completed in the required format and/or on the appropriate forms contained within the employer procedural guide;
- Information to be legible and accurate;
- Communications to be in a plain language style;
- Information provided to be checked for accuracy by an appropriately qualified member of staff;
- Information provided to be authorised by an agreed signatory; and
- Actions carried out, or information provided, within the timescales set out in this strategy document.

Timeliness

Overriding legislation dictates minimum standards that pension schemes should meet in providing certain pieces of information to the various parties associated with the scheme. The LGPS itself sets out a number of requirements for the administering authority or scheme employers to provide information to each other, scheme members and prospective scheme members, dependants, other pension arrangements or other regulatory bodies. Local performance standards have been agreed which cover all aspects of the administration of the scheme, where appropriate going beyond the overriding legislative requirements. These locally agreed standards for the London Borough of Haringey Pension Fund are set out below.

| S | Service Provided By London Borough of Haringey As The Administering Authority | | | | |
|---------------|--|--|--|--|--|
| Function/Task | | Performance target | | | |
| A 1 | LIASON AND COMMUNICATION | (Pensions Team) | | | |
| a) | Publish and keep under review the London Borough of Haringey Pension Fund Administration Strategy Statement. Within three months of ar changes being agreed with scheme employers | | | | |
| b) | Issue and keep up to date scheme guide and all other literature for issue to scheme members | | | | |
| с) | Issue and keep up to date all forms required for completion by either scheme members, prospective scheme members or scheme employers Within three months from admission of new employer or date of change/amendment | | | | |
| d) | Formulate and publish policies in relation to all areas where the administering authority may exercise a discretion within the scheme | Within 60 working days of policy being agreed by the Pension Committee | | | |

| e) | Host employer forum | Annually (at dates to be | |
|----|--|--|--|
| f) | Attend meetings with scheme employers | As and when required, following agreement with individual scheme employers | |
| g) | Organise training sessions for scheme employers | Upon request from scheme employers or as required | |
| h) | Publish changes to the scheme rules | Within one month of the change(s) coming into effect | |
| i) | Notify scheme employer (including the London Borough of Haringey in its role as a scheme employer) of issues relating to scheme employer's poor performance (including arranging meeting if required) | Within 5 working days of performance issue becoming | |
| j) | Notify scheme employer (including the London Borough of Haringey in its role as a scheme employer) of decision to recover additional costs associated with the scheme employer's poor performance (including any interest that may be due) | Within 10 working days of scheme | |
| k) | Issue annual benefit statements to active members as at 31 March each year | By the following end of June | |
| l) | Issue annual benefit statements to deferred benefit members as at 31 March each year | By the following end of June | |
| m) | Issue Pensions Newsletter to pensioner members annually | By April in each year | |
| n) | Issue Pensions Bulletins to active members | As and when required | |

| A2 | FUND ADMINISTRATION (Treasury Team) | | |
|----|--|---|--|
| a) | Issue formal valuation results (including individual employer details) | 10 working days following approval by Pensions Committee / Section 151 Officer (but in any event no later than 31 March following the valuation date) | |
| b) | Publish and keep under review, the fund's Governance Compliance Policy Statement | Within 30 working days of policy being agreed by the Pension Committee | |
| c) | Publish and keep under review the Council' Statement of Investment Principles | Within 30 working days of policy being agreed by the Pension Committee | |
| d) | Publish and keep under review the Council' Responsible Investment Policy Statement | Within 30 working days of policy being agreed by the Pension Committee | |
| e) | Publish and keep under review the Pension Fund's funding strategy statement | To be reviewed at each triennial valuation, following the consultation with scheme employers and the fund's actuary. Revised statement to be issued with the final valuation report | |
| f) | Publish Pension Fund Annual Report | Summary Report in June of each year. Full Report not later then 31st December in each year. | |
| g) | Arrange Pension Fund Annual General Meeting | To be held by July of each year and no later then December of each year. | |

| A3 | SCHEME ADMINISTRATION |
|----|-----------------------|

| a) | Maintain member records and issue statutory notices | 10 working days of social for the | |
|----|---|---|--|
| α, | and respond to requests for information or data | 10 working days of receipt of all necessary information or enquiry. | |
| b) | Process Transfers in and out of the Fund | | |
| c) | Process all applications to pay arrears of pension contributions in relation to leave of absence (inc. maternity/paternity/adoption leave) | 20 working days of receipt of all necessary information | |
| d) | Process requests to pay/amend/cease additional regular contributions | 20 working days of receipt of required documentation from scheme member | |
| е) | Process all enquiries relating to pension sharing on divorce | 20 working days of receipt of all necessary information | |
| f) | Provide requested estimates of benefits to employees/employers | 10 working days from date of request | |
| g) | Notify leavers of deferred benefit entitlements | Within 20 working days after leaving or such later date as all necessary documentation is available | |
| h) | Notify retiring employees of benefits. Pay benefits plus interest were required | Within 10 working days after retirement or such later date as all necessary documentation is available | |
| i) | Death notifications | Condolence letter within 5 working days of receipt of notification. Payment / final letter within 20 working days of receipt of required documents | |
| j) | Recovery of arrears of scheme member's contributions | Via issue of invoice to the scheme employer within 10 working days of notification of arrears by the scheme employer | |
| k) | Return of employee contributions plus interest where applicable | 20 working days following receipt of all necessary documentation | |
| l) | Appoint stage 2 "appointed person" for the purposes of the pension dispute process and notify all scheme employers of the appointment | Within 30 working days following the resignation of the current "appointed person" | |
| m) | Process all stage 2 pension dispute applications | Within two months of receipt of the application, or such longer time as is required to process the application where further information or clarification is required | |

| | Service By The Employing Bodies | | | |
|---------------|--|--------------------|--|--|
| Function/Task | | Performance target | | |
| B1 | | | | |
| a) | Formulate and publish policies in relation to all areas where the employing authority/administering authority may exercise a discretion within the scheme (including providing a copy of the policy decision(s) to the London Borough of Haringey Pension Fund | | | |

| b) | Remit and provide schedule of employer/employee contributions | By the 19th calendar day of month after deduction | |
|--|--|---|--|
| c) | Respond to enquiries from administering authority | 5 working days from receipt of enquiry | |
| d) | Provide year-end information required by the London Borough of Haringey Fund, in a format agreed with the London Borough of Haringey Pension Fund | By 30 April following the year end | |
| e) | Make payment of additional costs to the London Borough of Haringey Pension Fund associated with the poor performance of the scheme employer | Within 28 working days of receipt of invoice from the London Borough of Haringey Pension Fund | |
| f) Distribute any information provided by the London Within Borough of Haringey Pension Fund to scheme information | | Within 5 working days of receipt of information from the London Borough of Haringey Pension Fund | |
| g) | Provide new/prospective scheme members with scheme information and new joiner forms | Before joining and not later then two months after joining. | |
| B2 | FUND ADMINISTRATION | | |
| а) | All new prospective admitted bodies to undertake, to the satisfaction of the London Borough of Haringey Pension Fund, a risk assessment of the level or bond required in order to protect other scheme employers participating in the pension fund | To be completed before the body can be admitted to the London Borough of Haringey Pension Fund | |
| b) | All admitted bodies to undertake a review of the level of bond or indemnity required to protect the other scheme employers participating in the fund | Annually, or such other period as may be agreed with the administering authority | |
| c) | | | |
| В3 | SCHEME ADMINIST | | |
| a) | Make all necessary decisions in relation to new scheme members in the LGPS (whether full or part time pensionable pay, appropriate pay band, etc) | | |
| b) | Provide administering authority with scheme membe details in the format required via paper notification electronic interface | | |
| c) | Arrange for the correct deduction of employed contributions from a scheme members pensionable pay on becoming a scheme member | e Immediately on joining the | |
| d) | Ensure correct rate of employer contribution is applied | Immediately following notification of employer contribution rate by London Borough of Haringey | |
| е) | Ensure correct deduction of pension contributions during any period of child related leave, trade dispute or other forms of leave of absence from duty | Immediately following receipt of | |
| f) | Commence deduction of additional regular contributions or amend such deductions, as appropriate | | |
| g) | Cease deduction of additional regular contributions | Immediately following receipt of notification from the London Borough of Haringey Pension Fund | |
| h) | Arrange for the deduction of AVC's and payment over of | | |

| [| | | |
|--|--|---|--|
| | contributions to AVC provider(s) | month following the month of election/notification from the London Borough of Haringey Pension Fund Pay over contributions to the AVC provider(s) by the 19 th of the month following the month of | |
| i) | Refund any employee contributions deducted in error | deduction Month following month of deduction or month notified of the deduction in error? | |
| j) | Cease deduction of employee contributions where a scheme member opts to leave the scheme | Month following month of receipt of notification from the London Borough of Haringey Pension Fund, or such later date | |
| k) | Provide administering authority with details of all contractual changes to a scheme members hours and/or weeks of employment, in a format required by the Administering Authority via paper notification/ electronic interface | change event | |
| I) Notify other material changes in employee's Within 30 | | Within 30 working days of change event | |
| m) | Notify unpaid leave of absence and maternity/paternity leave in a format required by the administering authority | Within 30 working days of change event | |
| n) | Determine reason for leaving and provide notification in a format required by the administering authority of scheme leavers via paper notification/via electronic interface | Within 30 working days of change event | |
| 0) | Determine reason for retirement and provide notification to administering authority of retiree in a format required by the administering authority via paper notification/electronic interface | Immediately at point of resignation/notice given by employer | |
| p) | Accurately assess final pay for each scheme member who leaves/retire/dies and forward details in the format required by the administering authority | Unless Payroll Service provided by London Borough of Haringey notify London Borough of Haringey immediately date of leaving is known | |
| q) | Notification to the London Borough of Haringey Pension Fund of death of scheme member via paper notification/via electronic interface | Immediately on being notified of the death | |
| r) | Appoint an independent medical practitioner qualified in occupational health medicine in order to consider all ill health retirement applications and agree appointment with the London Borough of Haringey Pension Fund | Within one month of commencing participation in the scheme or date of resignation of existing medical adviser, | |
| s) | Appoint person for stage 1 of the pension dispute process and provide full details to the administering authority | Within 30 working days following the resignation of the current "appointed person", although employers currently make use of the stage 1 person used by the London Borough of Haringey Pension Fund | |
| t) | Review Third Tier III Health Retirement Cases | Notify London Borough of Haringey Pension Fund immediately a member retired with a third tier ill-health benefit | |

| | returns to paid employment or the outcome of the 18 month |
|--|---|
| | review whichever is earlier |

External Providers

The administering authority or scheme employers will ensure that any external service providers with responsibility for carrying out any functions relating to the administration of the Local Government Pension Scheme are aware of the standards to be met (such as external pension administration providers, payroll and HR providers). They will also be responsible for ensuring that those standards are met.

PROCEDURES FOR ENSURING COMPLIANCE WITH STATUTORY REQUIREMENTS AND LEVELS OF PERFORMANCE

Ensuring compliance is the responsibility of the administering authority and scheme employers. We will work closely with all scheme employers to ensure compliance with all statutory requirements, whether they are specifically referenced in the LGPS Regulations, in overriding legislation or in this Administration Strategy. We will also work with them to ensure that overall quality and timeliness is improved as part of an agreed service development plan. Various means will be employed, in order to ensure such compliance and service improvement, seeking views from as wide an audience as possible. These include:

Audit

The London Borough of Haringey Pension Fund will be subject to annual audit of its processes and internal controls. The London Borough of Haringey Pension Fund and scheme employers will be expected to fully comply with any requests for information from both internal and approved external auditors. Any subsequent recommendations made will be considered by the London Borough of Haringey Pension Fund and where appropriate duly implemented (following discussions with scheme employers where necessary).

Performance Monitoring

The London Borough of Haringey Pension Fund will monitor performance against specific tasks (set out above) from the event date (e.g. date of leaving/retirement, etc) to date of the completion of the task (notwithstanding that service levels for benchmarking purposes are measured from the date that all necessary data has been received/is available). As part of this monitoring exercise we will include the monitoring of the performance of each scheme employer in the provision of all necessary data required by the administering authority enabling completion of each task. The London Borough of Haringey Pension Fund will also monitor the performance of the administering authority in carrying out its responsibilities in relation to the scheme.

The London Borough of Haringey Pension Fund, as the administering authority, will benchmark our performance against other administering authorities by using benchmarking comparators available.

Employer liaison meetings

Such meetings will take place with representatives of the London Borough of Haringey Pension Fund and the scheme employer as and when required, to monitor and review performance against targets, the quality of information exchange and ensure compliance with statutory obligations.

Employing Body Forums (excluding LEA schools)

Annual meetings will take place to enable an exchange of experience between the London Borough of Haringey Pension Fund and the Fund Employing Bodies to promote statutory compliance.

Communication policy statement

The London Borough of Haringey Pension Fund's communication policy statement currently does not include specific details on monitoring the compliance of the administering authority and scheme employers in communication with various parties associated with the Local Government Pension Scheme. This statement is included as an appendix to this strategy and is subject to regular review to ensure that it remains fit-for-use.

Provision of Information pamphlets

Where necessary the London Borough of Haringey Pension Fund will update the provision of information pamphlets to reflect changes to processes, forms and/or responsibilities highlighted as a result of the monitoring of quality and timeliness.

Technical bulletins

The London Borough of Haringey ensures that all communication received from Communities and Local Government and/or the Employers Organisation is made available to all employers in the London Borough of Haringey Pension Fund. Where necessary, employers will also be notified of any resultant changes to their responsibilities.

Training sessions

The London Borough of Haringey Pension Fund will provide training to scheme employers as and when required in order to rectify significant performance issues where identified, or on request from the scheme employer.

Employing Body forums

Regular meetings (at least annually) will take place with representatives of the London Borough of Haringey Pension Fund and scheme employing bodies to discuss recent developments within the LGPS or pensions generally, as well as to monitor and review communication strategies. Liaison with LEA schools will be conducted through the existing communication channels.e.g The Schools Forum

Employer liaison meetings

Such meetings will take place with representatives of the London Borough of Haringey Pension Fund and the scheme employer as and when required, to discuss any issues relating to the LGPS and/or raise any issues around the performance of the scheme employer or services provided by the administering authority. More frequent meetings will be arranged if necessary (particularly if specific issues around the perceived poor performance of the scheme employer arise).

Continual review

The London Borough of Haringey Pension Fund will continually review the performance of the administering authority and scheme employers against the targets and standards set out in this strategy and address with scheme employers any issues that might be highlighted. The London Borough of Haringey Pension Fund will also monitor success against the targets set out in the three year rolling service improvement plan and take action where necessary.

CIRCUMSTANCES WHERE THE ADMINISTERING AUTHORITY MAY LEVY COSTS ASSOCIATED WITH THE EMPLOYING AUTHORITIES POOR PERFORMANCE

Regulation 43 of the Local Government Pension Scheme (Administration) Regulations 2007 provides that an administering authority may recover from an employing authority any additional costs associated with the administration of the scheme incurred as a result of the poor level of performance of that employing authority. Where an administering authority wishes to recover any such additional costs they must give written notice stating:-

- The reasons in their opinion that the scheme employer's poor performance contributed to the additional cost;
- The amount of the additional cost incurred:
- · The basis on how the additional cost was calculated; and
- The provisions of the pension administration strategy relevant to the decision to give notice.

CIRCUMSTANCES WHERE COSTS MIGHT BE RECOVERED

It is the policy of the London Borough of Haringey Pension Fund to recover all additional costs incurred in the administration of the LGPS as a direct result of the poor performance of any scheme employer or third party service provider. The circumstances where such additional costs will be recovered from the employing authority are:

- Persistent failure to provided relevant information to the administering authority, scheme member or other interested party in accordance with specified performance targets (either as a result of timeliness of delivery or quality of information);
- Failure to pass relevant information to the scheme member or potential members, either due to poor quality or not meeting the agreed timescales outlined in the performance targets;
- Failure to deduct and pay over correct employee and employer contributions to the London Borough of Haringey Pension Fund within the stated timescales;
- Instances where the performance of the scheme employer results in fines being levied against the administering authority by the Pension Regulator, Pensions Ombudsman or other regulatory body.

Approach Taken By Administrating Authority

The London Borough of Haringey Pension Fund will seek, at the earliest opportunity, to work closely with employers in identifying any areas of poor performance, provide the necessary training and development and put in place appropriate processes to improve the level of service delivery into the future. Consideration for seeking additional administration costs where persistent failure occurs and no improvement is demonstrated by a scheme employer would be seen as a failure and should only be taken once all opportunities to resolve any issues identified are exhausted. The following sets out the steps we will take in dealing with poor performance by a scheme employer:

- Write to the scheme employer, setting out area(s) of poor performance;
- Meet with the scheme employer, to discuss area(s) of poor performance and how these can be addressed;

- Issue formal written notice, where no improvement is demonstrated by the scheme employer/failure to take agreed action by the scheme employer, setting out the area(s) of poor performance that have been identified, the steps taken to resolve those area(s) and notice that the additional costs will now be reclaimed:
- Clearly set out the calculations of any loss resulting to the London Borough of Haringey Pension Fund or administering authority, or additional cost, taking account of time and resources in resolving the specific area of poor performance; and
- Make claim against the scheme employer, setting out reasons for doing so, in accordance with the Regulations.

REVIEW PROCESS

We will review our administration strategy to ensure it remains up to date and meets the necessary regulatory requirements at least every three years. A current version of the strategy statement will always be available on our website at www.haringey.gov.uk/pensionfund and paper copies will be available on request.

CONSULTATION

In preparing this pension administration strategy we have consulted with the relevant employing authorities and other persons considered appropriate. Where it is necessary to revise the pension administration strategy the relevant employing authorities will again be involved in the consultation process, along with other persons considered appropriate and will be notified in writing of the changes and where a copy of the revised strategy may be obtained.

Appendix 1

Scheme Employers

| ADMITTED AND SCHEDULED BODIES PARTICIPATING IN THE | | | |
|--|---------------------------|-------------|--|
| LONDON BOROUGH OF HARINGEY PENSION FUND | | | |
| Employing Body | Status | Open/Closed | |
| Age Concern Haringey | Community Admission Body | C | |
| Haringey C A B | Community Admission Body | C | |
| Alexandra Palace Trading Co | Community Admission Body | C | |
| | | | |
| Urban Futures London Ltd | Transferee Admission Body | C | |
| Enterprise Ltd | Transferee Admission Body | С | |
| Europa Ltd (pending completion) | Transferee Admission Body | С | |
| RM Education Ltd | Transferee Admission Body | C | |
| TLC Group Ltd | Transferee Admission Body | С | |
| Ontime Parking Solutions Ltd | Transferee Admission Body | С | |
| | | | |
| Homes for Haringey | Scheduled Body | 0 | |
| College of North East London | Scheduled Body | 0 | |
| Greig City Academy | Scheduled Body | 0 | |
| Fortismere School | Scheduled Body | 0 | |
| John Loughborough School | Scheduled Body | 0 | |
| Updated October 2009 | | | |

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Agenda Item 11

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is exempt

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