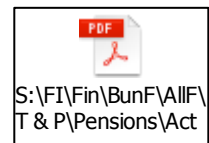
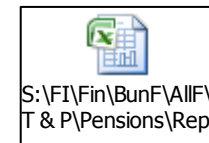
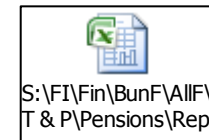
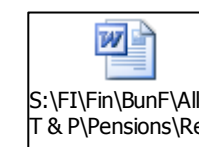
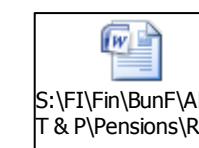
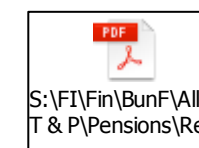


No	Key Indicator	Examples of Levels of Concern	Examples of good practice for high performing fund	Evidence and Comments	Fund Score	Previous Score	Maximum Score
1	Risk management	No or only partial and / or unclear risk register with no or poorly specified or un-implemented mitigation actions over time leading to increased fund risk. No evidence of risk register being:	Comprehensive risk register covering the key risks (in accordance with current CIPFA guidance) with prioritisation, robust mitigation actions, defined deadlines, with action tracking completion.				
		a) Prioritised	a) risks prioritised on a RAG red, amber, green or by a scoring methodology	The risk register has been approved by Committee.	1	1	1
		b) annually reviewed by Pensions Committee	b) completed actions signed off by Pensions Committee after at least an annual update.	The risk register is being reviewed at every meeting of the Board/Committee.	1	1	1
		c) annually reviewed by internal or external audit	c) annual review by internal and external audit	Internal audit review the risk register and use it to identify areas of the Scheme to be included in the annual audit plan.	0	0	1
		d) used to reduce high risk	d) less than three priority / red risks	The current risk register does not include any very high risk areas.	1	1	1
		e) available for public scrutiny	e) Public disclosure of a summary version published on fund website or in fund annual report.	An abridged version of the risk register will be included in the Fund's annual report.	1	1	1
		Score 1 point for each one		4	4	5	
2	Funding level and contributions	a) Decreased funding level (calculated on a standardised and consistent basis) and / or in bottom decile of LGPS over the last three triennial valuations on a standardised like for like basis.	a) Funding level rising and getting closer to 100% funded (or above) over the last three triennial valuations on a standardised like for like basis. Funding % - 91 to 100 = score +5, 80-90= +4, 70-70= +3, 60-69 = +2, less than 59 = +1	For fund as a whole? For council at the last two reported funding levels of 69% and 70%. Funding levels constant.	3	2	5
		b) No or minimal employer funding risk assessment and monitoring and not reported to Pensions Committee.	b) Employer funding risk assessment and monitoring reports to Pension Committee.	An employer profiling exercise has been undertaken where each employer in the Fund are measured against set criteria and risk scored in order to determine the level of risk they pose to the Fund. This assessment has been made available to the Actuary and will be presented to Committee in November.	1	1	1
		c) Total actual contributions received in the last 6 years less than that assumed and certified in last two triennial valuations.	c) Total actual contributions received in the last 6 years less than that assumed and certified in last two triennial valuations.	The Fund has contributed in line with assumptions made in the last two triennial valuations.	1	1	1
		d) Net inward cash flow less than benefit outgoings so need for any unplanned or forced sale of assets	d) Net inward cash flow less than benefit outgoings.	Overall, the Fund is cashflow negative as cash inflow is less than outflow.	0	0	1
			Score - 1 point for each		5	4	8

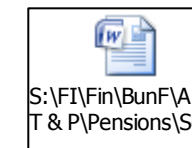


No	Key Indicator	Examples of Levels of Concern	Examples of good practice for high performing fund	Evidence and Comments	Fund Score	Previous Score	Maximum Score
3	Deficit Recovery	a) No or opaque deficit recovery plan.	a) transparent deficit recovery plans for tax raising and non-tax raising bodies	A schedule is produced for each employer indicating the deficit recovery period. The deficit recovery plan is clearly set out in the triennial valuation for Haringey Council, the only tax raising body in the Haringey Pension Fund.	1	1	1
		b) lengthening implied deficit recovery period for contributions	b) implied deficit recovery period reducing at each valuation.	Stable at 20 years.	0	0	1
		c) Implied deficit recovery periods > 25 years for last three valuations.	c) Implied deficit recovery period is less than 15 years for last three valuations.	20 year deficit recovery plan.	0	0	1
			Score 1 point for each.		1	1	3
4	Investment returns	a) required future investment returns as calculated by the actuary are consistent with and aligned to the investment strategy so higher likelihood of the fund meeting its funding strategy.	a) required future investment returns as calculated by the actuary are consistent with and aligned to the investment strategy so higher likelihood of the fund meeting its funding strategy.	The actuary uses the investment strategy to determine that there is a prudent probability of the deficit being eliminated.	1	1	1
		b) Actual investment returns consistently exceed actuarially required returns.	b) Actual investment returns consistently exceed actuarially required returns.	The 3, 5 and since inception average returns at 31 Dec 2015 of 9.63%, 7.70% and 7.82% exceed those assumed in the actuarial valuation.	1	1	1
			Score 1 point for each.		2	2	2
5	Pension Committee member competence	Appointees unclear of statutory role and unable to clearly articulate the funds funding and investment objectives.	Appointees understand their statutory role and are able to clearly articulate the funds funding and investment objectives.	Board members are required to complete the tPR's public service toolkit tutorial. Completion of the tutorial indicates sufficient knowledge about the role of a scheme board member.			1
		No evidence of:					
		a) different employer types and no or minimal scheme member representation.	a) representatives on Committee of different employer and employee types.	The Joint Pensions Committee and Board has employer and employee representatives members with full and equal voting rights.	1	1	1
		b) No training needs analysis or training strategy or training log or use of CIPFA LGPS training framework	b) annual training plan recorded against CIPFA's knowledge and understanding framework.	The Committee has approved a training policy framework that requires each member to complete a training needs analysis form which will be used to develop individual training programmes for all scheme board members	1	1	1
	c) No training recover disclosure	c) annual training records disclosed in the annual accounts.	Member training records are disclosed in the 2015-16 draft fund annual report and accounts	1	1	1	

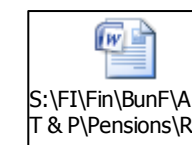


No	Key Indicator	Examples of Levels of Concern	Examples of good practice for high performing fund	Evidence and Comments	Fund Score	Previous Score	Maximum Score
		d) Self assessment	d) annual self - assessment of training undertaken and identification of future needs.	The Committee is in the process of assessing individual training needs of its members. This will be completed by December 2016.	0	0	1
			Score 1 point for each.		3	3	5
6	Administering authority staff accountability, leadership, experience and training	a) No or only part time Head of Fund and or only part time officers	a) Experienced Head of Fund with full time dedicated officers with at least three years experience.	Yes. The Head of Pension has over 3 years experience managing pension funds and has a team of staff that are wholly dedicated to the Scheme/Fund. It expected that a permanent Head of Pensions will be in post by the end of 2016.	1	1	1
		b) No or little induction or no on-going training provision or experience recorded on the adoption of CIPFA LGPD knowledge and understanding framework.	b) staff undertake regular CIPFA LGPS TKU or other CPD training recorded across all LGPS skills (governance, benefits administration, funding, investments and communications) Score 1 point for each.	Training undertaken via seminars and also using TPR on line training.	1	1	1
					2	2	2
7	Statutory Governance standards and principles (as per DCLG and TPR Codes)	Several key areas of non-compliance with:					
		a) DCLG LGPS Statutory Guidance	a) Full Compliance with DCLG LGPS statutory guidance	To be confirmed.	1	0	1
		b)TPR Guidance and codes	b) Full compliance with TPR guidance and codes for public sector pension schemes.	Although progress toward compliance with tPR Code of Practice has been made, the Fund is not yet fully compliant. The November meeting of joint Board and Committee will receive a comprehensive update on where the Fund is in terms of compliance.September meeting.	0	0	1
		c) No, little or poor key decision taking records and no or poor self, or scheme employers or scheme members assessment of overall fund effectiveness.	c) Meet or exceed other LGPS best practice on recording all key decision taking and annual self, scheme employers, scheme members assessment of effectiveness.	The Haringey Pension Fund Committee/Board has not undertaken any self assessment exercises so far. This will be included in Fund's work programme.	0	0	1
			Score 1 point for each.		1	0	3
8	Quality and accessibility of information and statutory statements, strategies, policies (governance, FSS, SIP, Communications, admin authority and employer discretion policies)	a) Statutory publications not all in place or published on fund web site or updated in accordance with regulatory requirements and due timelines.	a) Statutory publications all in place and published on fund web site and updated in accordance with regulatory requirements and due timelines.	All provided for loading on to the Hymans' sponsored member web site	1	1	1

No	Key Indicator	Examples of Levels of Concern	Examples of good practice for high performing fund	Evidence and Comments	Fund Score	Previous Score	Maximum Score
		b) Fund and employers discretions not published.	b) Fund and employers discretions published.	The Council's discretions policy is published. Those for other employers are their responsibility.	1	1	1
		c) Do not seek to meet any recognised 'Plain English' or e-publishing standards.	c) Meet 'Plain English' or and or other recognised e-publishing standards.	The content of the Pension Fund website has been tested readability and above 60 scores well on 'plain english' using the	1	1	1
			Score 1 point for each.		3	3	3
9	Adoption and report compliance with Investment Governance Principles (IGP) (was Myners Principles) and voluntary adoption / signatory to FRC Stewardship Code and UNPRI	No or un-explained non-compliance and /or support of					
		a) IGP	a) 100% compliance with IGP	The Fund is fully compliant with IGP.	1	1	1
		b)UK Stewardship Code	b) adoption and public reporting of compliance against the FRC UK stewardship Code.	The Fund has not adopted the FRC UK Stewardship Code.	0	0	1
		c)UN PRI	c) External managers or fund are PRI signatories.	All managers are PRI signatories	1	1	1
			Score 1 point for each.		2	2	3
						3	
10	Historic investment returns (last 1,3, 5) and total investment costs compared to other LGPS funds.	a) overall fund investment returns (net of fees) for last 1,3 and 5 years bottom two quintiles.	a) overall fund management returns (net of fees) or last 1,3 and 5 years. Top quarter score 5 points. 2nd quarter 3 points, 3rd quarter 0 points and 4th quarter -3 points.	Using CEM Benchmarking latest data, the Fund posted above average performances in the last 3 years - it is estimated that the Fund is in the 2nd quartile in terms of performance	3	3	5
		b)Retain fund managers under performing their benchmarks for two triennial valuation cycles.	b) Greater than 75% of fund managers deliver target performance over rolling three years periods. Score 1 point.	As at Sep 2016, only 2 out of three of the Fund's current managers with a history of 3 years of managing the fund's assets is performing to or above target. The other two managers are outperforming benchmark over one year.	1	0	1
		c) Fund does not benchmark its fund managers and total investment costs relative to other LGPS funds.	c) Fund benchmarks its fund manager and total investment costs. Score 1 point	Annual comparison reported to Committee as part of the annual accounts.	1	1	1
			Score 1 point for each.		5	4	7
11	Annual report and audited accounts	a) Do not fully meet some regulatory requirements or CIPFA LGPS guidance.	a) Meet all regulatory requirements and CIPFA LGPS guidance.	Yes	1	1	1
		b) Not published in Admin Authority Accounts by 1st October.	b) Published in Admin Authority Accounts by 1st October.	Yes	1	1	1



<https://www.unpri.org/sign>

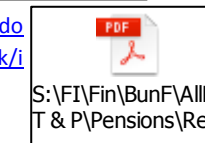


No	Key Indicator	Examples of Levels of Concern	Examples of good practice for high performing fund	Evidence and Comments	Fund Score	Previous Score	Maximum Score
		c) Published on SAB website after 1st November	c) Published on SAB website before 1st November	Yes	1	0	1
			Score 1 point for each		3	2	3
12	Scheme membership data	a) Common data does not meet TPR standards.	a) Greater than 99% of common data meets TPR quality and due date standards.	To be confirmed	0	0	1
		b) Conditional data do not meet the TPR standards. No plans in place to rectify this.	b) Greater than 95% of conditional data meets the TPR quality and due date standards. Plans in place to improve this.	To be confirmed	0	0	1
			score 1 point for each.		0	0	2
13	Pension queries, pension payments and annual benefit statements	a) No or poor website with no scheme member or employer access.	a) Good website with interactive scheme member and employer access.	Haringey utilise a Hymans hosted web site	1	1	1
		b) ABS do not meet regulatory requirements or due timelines for issuance.	b) ABS meets or exceeds regulatory requirements and due timelines for issuance.	The Scheme had some issues getting out the Annual Benefit Statements for active members last. We are working to ensure that the difficulties experienced in 2015 do not re-occur in 2016.	1	0	1
			Score 1 point for each.		2	1	2
14	Cost efficient administration and overall value for money fund management.	a) In bottom quartile with high total admin costs pa per member (based on CIPFA or other benchmarking tool).	a) In top quartile with low total admin costs pa per member (based on CIPFA or other benchmarking tool).	Using the CEM benchmarking analysis, the Haringey Scheme is in the top quartile for cost of administering the Scheme	1	1	1
		b) Not in any national or regional frameworks for any externally procured services or collective investments.	b) Lead or actively participates in collaborative working and collective LGPS procurement, shared services or CIV.	The Fund utilised the Norfolk Framework to appoint the current fund actuary and is an active member of London CIV.	1	1	1
			Score one point for each.		2	2	2
15	Handling of formal complaints and IDRPCs	a) Any Pensions Ombudsman determinations and any appeals or fines were against the action of the fund (not employers)	No stage 2 IDRPCs and no Pensions Ombudsman finding against the fund's actions in the last three years.	There were no IDRPCs on Pension Ombudsman finding against the Funds actions in the last three years.	1	1	1
			Score one point for each.		1	1	1
16	Fraud Prevention	No or minimal systems / programme or plan or mechanism in place to:					
		a) Prevent fraud	a) Fraud prevention programme in place.	The Fund has an internal control system in place to combat fraud. This includes regular reconciliation of done on members list to ensure there are no duplicates.	1	1	1
		b) detect fraud	b) Use external monthly, quarterly or annual mortality screening services.	Monthly screening used	1	1	1

<http://www.haringeypensionfund.co.uk/>



<http://londoncivil.org.uk/investors>

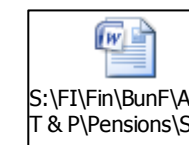
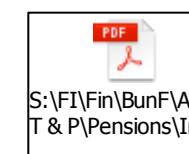


No	Key Indicator	Examples of Levels of Concern	Examples of good practice for high performing fund	Evidence and Comments	Fund Score	Previous Score	Maximum Score
		c) detect pension overpayment due to unreported deaths.	c) Pariticipate in bi-annual fraud initiatives.	The Council participates in the bi-annual national fraud initiative.	1	1	1
			Score one point for each.		3	3	3
17	Internal and external audit	a) No annual internal audit or qualified internal and external audit opinions.	a) Unqualified annual internal audit report with no or only low priority management action.	Full assurance in most recent internal audit reports.	1	1	1
		b) Urgent management action recommended on high / serious risk.	b) Unqualified annual external audit report with no or only low priority management action.	No recommendations in last external audit report.	1	1	1
		c) Only moderate or low level of assurance and a number of high priority action recommendations.	c) Full or substantial assurance against all key audit areas with no high risk recommendation.	Full assurance in most recent internal audit reports.	1	1	1
			Score one point for each.		3	3	3
18	Quality assurance	No evidence of:					
		a) quality management system	a) Fund has formal quality management external certification.	no.	0	0	1
		b) externally reviewed publications.	b) Crystal Mark for plain English for publications.	Text from the Pension Fund website has been subjected to a 'plain english' test - the text achieved a reasonable score.	1	1	1
		c) externally approved website accessibility	c) Externally approved web site accessibility.	Yes	1	1	1
		d) any awards	d) pensions & investment recognition awards.	The Fund has not entered into any competitions.	0	0	1
			Score one point for each.		2	2	4

42 37 59

Level of Compliance

71%



GOVERNANCE REVIEW - FOLLOW UP ACTION REQUIRED					
Ref No.	Recommendation	Action	Responsibility	Deadline	Duplicated
1	A revised Governance Compliance Statement is prepared, consulted upon and approved by the combined Pensions Committee and Board, as soon as practical, to reflect the arrangements for the exercise of the functions of the Administering Authority and Pensions Board arising from the replacement of the former Pensions Committee by the combined Pensions Committee and Board	The review and updating of the Fund's Governance Compliance Statement has been programmed into the Fund's work plan for the municipal year.	Head of Pensions	Sep-17	No
2	The Training and Conferences update report to be presented to the combined Pensions Committee and Board at its meeting on 22 November 2016 specifically include coverage of the completion by members of the Pensions Regulator's on-line "Public Service Toolkit" and also the application of the Training Needs Analysis forms completed by the members of the combined Committee and Board	The training and conferences report now includes a report on completion by members of The Pension Regulator's on-line Public Service Toolkit and receipt of completed Training Needs Analysis forms.	Head of Pensions	Jan-17	No
5	A comprehensive Medium Term Business Plan (MTFP) incorporating an Annual Plan and including a Medium Term and detailed Annual Budget, is considered and approved annually by the Pensions Committee and Board and formally monitored by the Committee and Board on a quarterly basis	An MTFP is being prepared and will be presented to the March 2017 meeting of the Committee for approval.	Head of Pensions	Mar-17	No

GOVERNANCE REVIEW - FOLLOW UP ACTION REQUIRED					
Ref No.	Recommendation	Action	Responsibility	Deadline	Duplicated
11	The "Compliance with Myners Principles" section of the Statement of Investment Principles is revised so that against each of the Principles the explanation commences with either of three phrases "Compliant," "Partially Compliant," or "Not Compliant and the explanations in respect of compliance with each of the revised Myners Principles be extended so as to provide a fuller explanation of compliance or otherwise	The Myners compliance statement will be revised to clearly indicate whether the Fund is compliant or not.	Head of Pensions	Sep-17	No
12	A revised Statement of Investment Principles which reflects the changes to the Fund's Investment Strategy agreed in January 2016 is prepared and approved as soon as practical	A revised Statement of Investment Principles will be presented and approved by the Committee/Board by March 2017.	Head of Pensions	Mar-17	No
13	The Policy Statement on Communications with Scheme Members and Employers be reviewed with a view to updating it	Review of Communications Policy is on the work plan.	Pensions Manager	Jan-17	No
14	The Quarterly Reports on the performance of the Pensions Administration function include consideration of quality and performance issues including information on the adherence to the requirements of Code of Practice No 14 by both the Pension Fund and individual Employers within the Fund	The Committee receives a report on pensions administration at each of its meetings. This report will be reviewed to include more qualitative information, especially around compliance with the requirements of TPR CoP No 14.	Head of Pensions	Mar-17	No
15	The Quarterly Pensions Administration report should also include monitoring of a broad range of Performance Standards in terms of processing issues relating to individual members of the Fund	See comments at 14.	Head of Pensions	Mar-17	No

GOVERNANCE REVIEW - FOLLOW UP ACTION REQUIRED					
Ref No.	Recommendation	Action	Responsibility	Deadline	Duplicated
16	The Officers prepare a draft Pension Administration Strategy under Regulation 59 of the LGPS Regulations 2013 (As amended) for approval by the Pensions Committee and Board after due consultation	An approved pension administration strategy is in place. The current version will be reviewed and presented for approval by the Committee.	Pensions Manager	Jan-17	No
17	That consideration is given to the Fund levying a charge on both LEA and Academy schools that do not use the Council's payroll	This is still under review. A report will be presented to Committee in January 2017.	Pensions Manager	Mar-17	No

GOVERNANCE REVIEW - DUPLICATE/NO FURTHER ACTION REQUIRED

Ref No.	Recommendation	Action	Responsibility	Deadline	Duplicated
3	Each meeting of the combined Pensions Committee and Board commences with an item “Declarations of Interest and Conflicts of Interest” rather than simply “Declarations of Interest”	Declaration of conflicts of interest now included as a standing item on the agenda of Committee meetings.	Clerk of the Committee	Completed - No Further Action Required	No
4	Given the legal requirements in relation to Conflicts of Interest/potential Conflicts of Interest and Reporting Breaches of the Law a training session covering these two issues, with particular reference to the relevant policies adopted by the former Pensions Committee, is arranged and presented to the members of the combined Pensions Committee and Board as soon as practical	Members receive training on conflicts of interest. The Committee recently considered in detail a report on breaches of the law in July and have also completed the online training for breaches of the law.	Head of Pensions	Completed - No Further Action Required	No
6	The Officers implement and utilise a Risk management cycle in accordance with the approach and detail provided on pages 6 to 8 of the CIPFA Publication <i>“Managing Risk in the Local Government Pension Scheme”</i> (November 2012). This should include a consideration by the Officers of all areas of Risk and potential risk on a quarterly basis	The Committee/Board already manage risk on a cyclical basis, so that each area of risk will be considered once a year.	Head of Pensions	Completed - No Further Action Required	Yes
7	As part of the ongoing review of the Risk Register it should be ensured that each of the seven areas of Risk in the relevant CIPFA guidance is actively considered	Based on current work plan/ programme each area of risk will be considered by the Committee.	Head of Pensions	Completed - No Further Action Required	Yes

GOVERNANCE REVIEW - DUPLICATE/NO FURTHER ACTION REQUIRED

Ref No.	Recommendation	Action	Responsibility	Deadline	Duplicated
8	The Pension Fund have a separate and specific Annual Internal Audit Plan (which includes a focus on Pension Administration issues) and that the combined Pensions Committee and Board receive this Plan, the findings and recommendations of individual Audits, and also an Annual Report from Internal Audit	To liaise with the Head of Audit & Risk Management to create an Annual Audit Plan for the Pension Fund.	Head of Pensions	N/A	Yes
9	The Fund liaise with the Actuary as soon as practical to seek to ensure that the Funding Strategy Statement prepared in conjunction with the 2016 Actuarial Valuation is fully compliant with the 2016 CIPFA guidance on the preparation of the FSS and facilitates a Valuation which is likely to meet the tests of Compliance, Consistency, Solvency and Long Term Cost Efficiency as applied by the Government Actuary's Department to the 2016 Actuarial Valuation of the Haringey Pension Fund	The FSS and valuation is compliant.	Head of Pensions	Completed - No Further Action Required	No
10	In order to enhance the ongoing monitoring of the Funding Level and inform Investment Strategy decisions the Fund consider whether to request more regular Funding Updates (Interim Valuations) from the Fund Actuary	The Fund invests on a long term basis. Also, the FSS is reviewed at each valuation. This is sufficient for the purposes of the Haringey Fund.	Head of Pensions	Completed - No Further Action Required	No