



Pension Board

Tuesday 3 November 2020 at 6.00 pm

This will be held as an online virtual meeting

Details on how to access the link in order to view proceedings will be made available online via the following link: [Democracy in Brent](#)

Membership:

Members

David Ewart

Representing

Independent Chair

Councillor Members

Councillor Crane

Councillor Kabir

Brent Employer representative

Brent Employer representative

Co-opted Members

Bola George

Chris Bala

Robert Wheeler

Member representative (Unison)

Pension Scheme Members Representative

GMB Trade Union

For further information contact: Joe Kwateng, Governance Officer
joe.kwateng@brent.gov.uk; 020 8937 1354

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:

www.brent.gov.uk/committees

The press and public are welcome to attend part of this attend this meeting as an on online virtual meeting. The link to attend and view proceedings will be made available online via the following link: [Democracy in Brent](#)

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences**- Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

(a) Anybody of which you are a member or in a position of general control or management, and:

- To which you are appointed by the council;
- which exercises functions of a public nature;
- which is directed is to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party of trade union).

(b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;

a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

Apologies for absence and clarification of alternate members.

Item	Page
1 Apologies for absence	
2 Declarations of interests	
Members are invited to declare at this stage of the meeting, any relevant personal and prejudicial interests and discloseable pecuniary interests in any matter to be considered at this meeting.	
3 Minutes of the previous meeting - 5th August 2020	1 - 10
To approve the minutes of the previous meeting as a correct record.	
4 Matters arising (if any)	
5 Pension Fund Administration Update	11 - 48
This report updates the Pensions Board on various pensions administration matters as part of its remit to oversee the administration of the Brent Pension Fund.	
6 Actuarial Update: COVID-19 and Regulatory Changes	49 - 96
The purpose of this report is to assist the Pension Sub-Committee to understand the nature and impact of several recent changes to Regulations on the Fund as well as recent market movements. I have attached an appendix to the main report.	
7 Brent Risk Register	97 - 114
This report presents the updated Risk Register for the Brent Pension Fund Pensions Administration Service. I have attached 2 appendices to the report.	
8 Investment Monitoring report 2020, Q2	115 - 134
This report by Hymans Robertson sets out the investment monitoring for quarter 2, 2020.	

9 Investment Strategy: Transition Roadmap 135 -
152

The purpose of this report is to detail the investment strategy transition roadmap prepared by the Fund's investment advisors, Hymans Robertson.

I have attached 2 appendices to the main report.

10 Competitive Markets Authority (CMA) Objectives 153 -
158

The purpose of this report is to the outline proposed approach to be taken by the Fund in relation to the assessment of Hymans Robertson against CMA objectives set in 2019.

I have attached an appendix to the main report.

11 Brent Pension Fund: Annual Report and Accounts 2019-2020 159 -
330

This report presents the draft Pension Fund Annual Report and audited Annual Accounts for the year ended 31 March 2020.

I have attached an appendix to the main report.

12 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Head of Executive and Member Services or his representative before the meeting in accordance with Standing Order 60.

13 Exclusion of Press and Public

The press and public will be excluded from the remainder of the meeting as the report to be considered contains the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely:

"Information relating to the financial or business affairs of any particular person (including the authority holding that information)."

14 London CIV Update 331 -
380

The purpose of this report is to update the committee on recent developments within the London CIV (LCIV).

I have attached 3 appendices to the main report.

Date of the next meeting: Tuesday 23 March 2021



MINUTES OF THE PENSION BOARD
Held as an online meeting on Wednesday 5 August 2020 at 6.00 pm

PRESENT:

Independent Member	Mr David Ewart (Chair)
Council Members	Councillor George Crane
	Councillor Sandra Kabir
Unison Members	Ms Bola George
	Mr Robert Wheeler
Scheme Member	Mr Chris Bala

1. **Apologies for absence**

Received from Councillor Aden.

2. **Declarations of interests**

None declared.

3. **Minutes of the previous meeting**

RESOLVED:

That the minutes of the last meeting held on 22nd October 2019 be approved as an accurate record.

4. **Matters arising**

None.

5. **Deputation**

None.

6. **2019 Triennial Valuation Results and Funding Strategy Statement**

This report set out the results of 2019 triennial actuarial valuation and the Funding Strategy Statement (FSS) for consideration and approval. In introducing the report, Sawan Shah (Senior Finance Analyst) referenced the background to the valuation process including the presentation at the meeting in October 2019 at which Hymans Robertson (Fund's Actuary) gave a presentation on the valuation process, the assumptions used and the initial results.

Since that meeting the draft valuation results schedules, which set the contribution rate for each employer for the next three financial years, have been produced for the Council and for most employers within the Fund. Most employers within the Fund had been informed about this. He drew Members' attention to the draft valuation report, attached in restricted Appendix 1 that summarised the process, the valuation results, funding position and employer contribution rates for 2020/21 to 2022/23. In line with the valuation process, the Council commissioned a contribution rate modelling exercise to allow officers to consider a long term funding strategy for the stabilised employers within the Fund, that is, Brent Council, academies and local authority schools.

Based on the modelling results and discussions with the fund actuary, officers proposed to freeze contribution rate at 35% of pay for next 3 years and stabilised thereafter at +/- 1% per annum to take account of risks on the 16 or 19 year time horizon. The Fund actuary had agreed this proposal. He drew Members' attention to the restricted Appendix 2 that set out the full contribution rate modelling report. He continued that as part of the valuation, the council was considering paying a large part of its employer contributions upfront as a lump sum. A report commissioned by the Fund actuary to model a number of options, set out further in Appendix 3, concluded that there was an economic benefit to the Council in considering this without negative impact on the pension fund. This proposal, quite common across a number of LGPS funds, would require advance clearance with the Council's auditor and subject to independent advice. Officers envisaged that a decision on this in early March 2020, so that it could be reflected in the formal valuation.

Ms Anna McCormack (Senior Pensions Manager) updated members on the abatement policy, following the Board's decision to consult with members. She added that the policy that affected only 7 recipients had gone live since April 2020.

With no further issues to be raised, the Chair thanked all officers for the updates and it was;

RESOLVED:

- (i) That the draft valuation report be noted and agree that delegated authority be granted to the Director of Finance to finalise the report before 31 March 2020.
- (ii) That the contribution rate for the next three financial years, 2020/21, 2021/22 and 2022/23 for Brent Council be approved as 35.0% as set out in section 3.8 of this report and Appendix 2.
- (iii) That delegated authority be granted to the Director of Finance to finalise details of the advance payment of Brent Council's employer contributions and the subsequent impact on the rates and adjustment certificate, as set out in section 3.9 of this report and Appendix 3.
- (iv) That the Funding Strategy Statement (FSS) as set out in section 3.13 of this report and Appendix 4 be approved.

7. Chair's Annual Report

This report provided a summary of the work carried out by the Council's Pensions Board for the period June 2019 to the end of 2019/20 Municipal Year. The report presented details of the Board members, training and items covered during the

Board's meetings. It also raised a number of items the Board wishes to draw to the Councils attention.

The Chair expressed thanks to the other members of the Board for their contribution and officers for their guidance and steer in organising a series of training sessions for Board members. He then highlighted the key issues identified from the Board's discussions during the year report including the following;

- Transfer of the Pensions Administration Contract.
- Risk Management.
- Pension Administration Strategy.
- Annual Benefit Statements.
- 2019 Triennial Valuation Results and Funding Strategy Statement.

Members welcomed the report and with no further issues being raised, it was;
RESOLVED:

The Board note the annual report, and agree to submit it to the General Purposes Committee.

8. **Pensions Administration Update**

This report updated the Pensions Board on various pensions administration matters as part of the Board's remit to oversee the administration of the Brent Pension Fund. With reference to the tables within the report, John Crowhurst (Operations Director, LPP) informed the Board about the following salient points;

Administration

- The percentage of cases completed on time had remained high with an average of 99.1% of cases being completed on time in June.
- Further details provided in the report showed that overall 85% of the 348 cases completed on time were completed early.

Covid-19

In line with government guidance, the pension administration team were considered key workers as they were 'delivering essential public services such as the payment of benefits. The Pensions Team both LPP and Brent staff have adapted successfully to working from home and all had been encouraged to use web-based channels and email where possible, for non-urgent queries. In line with the guidance issued by The Pensions Regulator (TPR) that administrators focussed their activities on making sure they deliver critical processes, LPP had been prioritising payment to existing pensioners, processing new benefit cases and dealing with bereavement cases.

Annual Benefit Statements.

At the time of dispatch of this report, eight employers which represent 6% of active members in the Fund had not submitted their end of year return. Officers contacted senior management at these employers to ensure that these returns were received promptly and to date all year returns had been received.

Data Cleanse and GAD Valuation

The first phase of the project was completed ahead of submission of membership data for the 2019 triennial valuation. The Fund submitted the data to the

Government Actuary's Department (GAD) in October 2019 and cost cap assessment at 31 March 2020. Ahead of the September 2020 submission, the Fund was carrying out a focussed exercise with a view to clearing a large proportion of the backlog of cases.

Record Keeping Plan (RKP)

The Fund's Record Keeping Plan (RKP) formally documents the actions being taken to review and address the data issues facing the Fund. The RKP was being updated to reflect phase two of the data cleanse project incorporating new activities undertaken including GAD data collection exercise and the tracing of pensioner addresses. The new RKP will be presented to the board at the next meeting.

Internal Audit

During the audit, internal audit identified a number of examples of good practice but no issues of high risk. There were two each of low risk issues and medium risk issues (Terms of Reference for the Pension Fund Sub Committee and vacant posts within the two governing bodies and Absence of a skills matrix for members). In order to address this, recruitment for two vacant posts had commenced and officers had received two expressions of interest to serve as an interview panel member. Mr Ravinder Jassar (Head of Finance) sought a third member and asked that expressions of interest be sent to him for consideration. The Head of Finance also outlined further measures to address the absence of skills matrix. Overall, the scheme manager was pleased with the outcome of this audit and actions taken to address some of the issues identified.

With no further issues to be raised, the Chair thanked all officers for the updates and it was;

RESOLVED:

That the position in relation to annual benefit statements the actions taken by the scheme manager against employers who do not comply with the Pensions Administration Strategy be noted.

9. **LPP Scheme Administration**

Mr John Crowhurst (Operations Director LPP) gave a slide presentation highlighting the following:

- Continued stability in the face of Covid-19 despite some disruption in the move to homeworking. Casework performance of over 99% for Brent in May/June respectively.
- Best ever satisfaction scores since Business Continuity Planning (BCP)
- Helpdesk remote working temporary solution was replaced on 11th June with robust solution delivering enhanced functionality and management reporting.
- All post redirected from our offices and being scanned by a third party supplier, and currently investigating products to enable digital signing of documents.
- Temporary lull in incoming post, email and call volumes experienced whilst people adjusted to the pandemic but have now generally returned to normal levels. Reported deaths were c.30% higher than normal.

- Fortnightly client calls were in place between LPPA and Brent Officers (weekly at the start of the pandemic).
- Work on our IT platforms to support LPPA continues with the core focus on administration systems including procurement options.
- Finalising new service metrics to be the basis for future management reporting.

Service Level performance

- Overall pension administration casework performance consistently exceeding Service Level Agreement with focus on payment and priority cases and new targets to track elapsed time of retirement and cases of bereavement.

Helpdesk

- Overall wait times generally under 2 minutes with over 90% of calls answered and all bereavement cases prioritised in the call queue.

Retirement satisfaction

- 177 retirees responded to surveys with feedback on the retirement experience achieving 89% satisfaction. The main reasons for dissatisfaction were; delays in making payment of retirement benefits, lack of understanding of the process/expected timescales and communication when there were delays.

Engagement priorities 2020/21

- Recruited Head of Engagement & Communications / Recruitment of Member Engagement Manager & investment in the function
- Introducing new KPI's and targets aligned to improving the member experience
- New client report
- Formalise communications plans for members and employers & review all letters.
- Improved member and employer experience.

Members welcomed the presentation and with no further issues raised, the Chair thanked Mr Crowhurst for the updates.

RESOLVED:

That the LPP scheme administration report be noted.

10. **LPP Complaints data 2019/2020**

Mr John Crowhurst (Operations Director LPP) introduced the report. He informed the Board that in 2019/2020 LPP received a total of 25 complaints split over 4 quarters as set out in the report. In comparison with other Funds this figure was not high. The majority of complaints received were in respect of historic data issues which pre-date LPP. In order to address these, LPP appointed a dedicated Complaints Manager in June 2019. Monthly meetings with the pension administration operational teams to identify service improvements had been set up and the following reviews were being carried out:

- A review of all letters ensuring that they meet all regulatory guidelines and are understandable to the recipient. i.e. Jargon will be removed
- The new member website will go live during Q3 of 2020/21. Officers were also reviewing the content of the website and the site to ensure that it is user friendly and easy to navigate.
- Client reports enhanced to provide a broader overview of performance against the service being provided to Brent members and employers
- More in-depth reporting that outlined the customer journey for a range of processes that helped to target the right areas through use of our Engagement team was now available.

11. **LPP COVID-19 Impact Analysis**

This report presented analysis from the Fund's administration provider Local Pensions Partnership (LPP) regarding the impact of the COVID-19 coronavirus pandemic, on the number of death notifications (bereavements) received, relating to members in the Brent Pension Fund and Brent Teachers Pension Fund since the start of this year.

Mr Saagar Raithatha drew the Board's attention to appendices 1 and 2 that provided insight for both the Brent Pension Fund and the Brent Teachers Pension Fund. Members noted that death notifications for members of the Brent Pension Fund were higher in April than in the same period last year (28 vs 3) and members of the Brent Teachers Pension Fund 16 vs 6). He continued that additional resources were being deployed consequently. He added that the increase in the number of death notifications would not be material to the extent of affecting the value of the Fund's liabilities.

Members welcomed the report and with no additional issues raised, the Chair thanked officers for the update. It was RESOLVED:

That the update be noted.

12. **LGPS Update**

The report updated the Board on recent developments within the LGPS regulatory environment and any recent consultations issued by the Ministry of Housing, Communities and Local Government (MHCLG) which have would have a significant impact on the Fund. Saagar Raithatha informed the Board that early analysis indicated that around 1.2 million members across LGPS, equivalent to roughly a quarter of all members, may be affected. Officers were working together with the Fund's actuary, Hymans Robertson and the Fund's admin provider LPP to further work through the details of the consultation before preparing a response.

The closing date of this consultation will be on 8 October 2020. Comments from any member of the Board regarding the consultation should be sent to Ravinder Jassar (Head of Finance) ahead of the closing date.

The other update involved the plans to cap exit payments in the public sector of £95,000. On 10 April 2019, HM Treasury (HMT) launched a consultation on draft

regulations, guidance and directions to implement the cap. The consultation closed on 3 July 2019 and received around 600 responses. Despite the concerns, there has been no proposal to change the level of the cap at this stage.

In response to Members' questions, officers stated that they were awaiting details of how the cap would be implemented and whilst the Government had not made the impact clear, there would be no impact on Brent retirees and beneficiaries.

13. **Brent Risk Register**

This report presented the updated Risk Register for the Brent Pension Fund Pensions Administration Service. Brent Pension Fund Sub-Committee considered this report at its last meeting and noted the following:

Key changes to the Risk Register:

- The key changes to the risk register had been updated to reflect the impact of coronavirus (COVID-19).
- Following the release of the McCloud consultation, the risk register had provided an update on the work to be conducted by officers ahead of the response on the consultation.
- No major concerns received to the draft accounts.
- Manageable risk had been assigned to the flexible use of remote working facilities

In response to a question as to whether redundancies would impact on the Fund, Sawan Shah replied that whilst it was unlikely to have a significant on the Council as an employer redundancies could adversely impact the smaller employers. The Actuary would project the number of redundancies and would feed that into the valuation.

Members welcomed the report which had been presented to Brent Pension Fund Sub-Committee and RESOLVED:

That the updated Brent risk register be noted.

14. **Investment Management Report Q1 2020**

This report gave an overview of the Fund's performance for the quarter. Brent Pension Fund Sub-Committee had considered this report at its last meeting and noted the following:

- The assets underperformed against the aggregate benchmark over the first quarter of 2020. The Fund returned -10.7% over the quarter, underperforming its benchmark by 3.2%.
- The value of the Fund's assets fell by £99.5m over the quarter, from £934.8m to £835.3m but to date had recovered to £917m. The fall in value was spread across the majority of asset classes as markets reacted to the global spread of COVID-19.
- Over the quarter the Fund received its first capital call for the LCIV Infrastructure fund.
- An analysis of each manager's performance in the quarter as set out in the report with no changes to manager rating changes to existing managers.

Members welcomed the report on investment management quarter1 and RESOLVED:

That the investment management report on quarter 1 be noted

15. **Low Carbon Equity Fund Investment**

The Sub-Committee received a report that presented an analysis and results of investment options agreed as part of the investment strategy review carried out in Q1 2020 to make an initial investment in a low-carbon equity fund. Brent Pension Fund Sub-Committee had considered the report at its last meeting at which the following were noted:

- Investing in low carbon equity fund was one of a number of ways in implementing a more Responsible Investment (RI) and environmental, social and governance (ESG) focussed investment strategy.
- The investment would be funded with a proportion (£28m) of the Fund's excess cash holdings.
- Viable options appraisal of the existing managers concluded that Blackrock (the Fund's existing passive fixed income manager) was a more suitable option as it delivers on fossil fuel exclusion, carbon reduction, active engagement and value for money.

RESOLVED:

- (i) That the analysis set out in Appendix 1 undertaken by the Fund's investment advisors, Hymans Robertson in relation to an initial investment in a low-carbon equity fund be noted.
- (ii) That the approval of an initial investment of c£28m in the BlackRock ACS World ESG Tracker Fund be noted.

16. **Investment Strategy: Transition Roadmap**

The report detailed the investment strategy transition roadmap prepared by the Fund's investment advisors, Hymans Robertson. Brent Pension Fund had considered this report at its last meeting at which the following summary of the key action points of the strategy were noted:

- Low carbon equities: subject to approval by the Committee, to invest £25m to £30m (c3% of Fund assets) in a passive low carbon equity fund and build further exposure to low carbon/sustainable oriented equities over time, partially using proceeds from reducing exposure to UK equities
- Increase interim allocations to equity and cash as a proxy for future infrastructure investments, until the agreed infrastructure allocation is built up. He recommended that the 3% overweight position be maintained alongside a 2% holding in cash while the Fund builds its investment in infrastructure.
- Build infrastructure investment over time: the Fund has undrawn commitments of c£50m to the LCIV infrastructure fund and c£12m to Alinda

(total 7% of Fund assets) so exposure to infrastructure will increase naturally.

- Baillie Gifford and Ruffer: Consider appropriate balance between these managers, acknowledging different styles.
- Cash holding: the Fund held c£54m of cash at 31 March 2020. £12m being used to increase the Fund's emerging markets equities (£8m) and multi-asset credit (£4m) holdings plus a proposal to invest £25m to £30m in a passive low carbon equity fund.

Members welcomed the report and RESOLVED:

- (i) That the report be noted;
- (ii) That the proposal to balance the Diversified Growth Funds be noted.

17. **Draft Statement of Accounts 2019/2020**

This report presented the draft Pension Fund Annual Accounts for the year ended 31 March 2020. Brent Pension Fund Sub-Committee had considered this report at its last meeting at which the following the key were noted:

- During 2019/20, the value of the Pension Fund's investments decreased from £856m to £835m (2018/19 £856m) due to the poor performance of equity markets in the final quarter of the year related to COVID-19.
- Total contributions received from employers and employees were £60m for the year, an increase on the previous year's £52.1m.
- Total benefits paid to scheme beneficiaries, in the form of pensions or other benefits, were £48m, an increase on the previous year's £46m.
- As in 2018/19, the cash-flow position was positive because its contributions exceed its outgoings to members.
- The Fund completed its 2019 valuation in the 2019/20 financial year when it was agreed that the employer contribution rate would remain stable at 35% for the next 3 years. This was consistent with the Fund's deficit recovery plan to clear its deficit within 19 years of the balance sheet date.
- The Triennial Valuation revealed that the Fund's assets, at 31 March 2019, were sufficient to meet 78% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date, a significant increase on the 55% funding level as at the March 2016 valuation.
- The external auditors had not raised any major queries with the annual accounts.

Members welcomed the report and officers' updates and RESOLVED:

That the Pension Fund Draft Annual Accounts 2019/20 be noted.

18. **Date of next meeting**

The next meeting will be held on 3rd November 2020 at 6.00pm.

19. **Any other urgent business**

None.

20. **Exclusion of Press and Public**

RESOLVED

The press and public be excluded from the remainder of the meeting as the report be considered contained the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely:

"Information relating to the financial or business affairs of any particular person (including the authority holding that information)"

21. **London CIV Update**

The purpose of this report was to update the Sub-Committee on recent developments within the London CIV (LCIV). Brent Pension Fund Sub-Committee had considered this report at its last meeting. Mr Ravinder Jassar (Head of Finance) provided updates on the following key aspects within the report:

- i) ESG reporting.
- ii) Multi asset credit fund.
- iii) Private debt.
- iv) Fund launches.

RESOLVED:

That the recent developments within the London CIV be noted.

The meeting closed at 7.35 pm

MR. D EWART
Chair

 <p>Brent</p>	<p>Pension Board 03 November 2020</p>
<p>Report from the Director of Finance</p>	
<p>Pensions Administration Update</p>	

Wards Affected:	ALL
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	OPEN
No. of Appendices:	<ol style="list-style-type: none"> 1. Breaches Policy 2. Reforming local government exit pay
Background Papers:	N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Minesh Patel, Director of Finance Ravinder Jassar, Head of Finance Sawan Shah, Senior Finance Analyst

1.0 Purpose of the Report

1.1 This report updates the Pensions Board on various pensions administration matters as part of its remit to oversee the administration of the Brent Pension Fund.

2.0 Recommendation(s)

2.1 The board is recommended to note the overall report.

3.0 Pensions Administration Performance Report

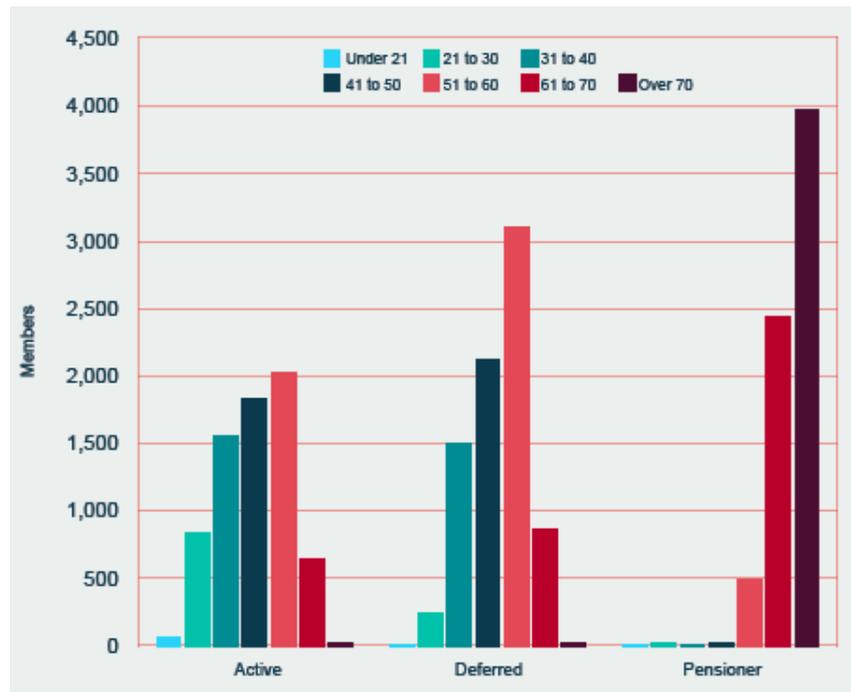
3.1 The administration of the Brent Pension scheme was transferred to LPP on 1 October 2018. This report reviews the performance of the LPP contract against agreed Service Level Agreements (SLA's) during June to September 2020.

3.2 The Pensions administration team are holding monthly meetings with LPP to monitor the performance of the contract looking at both the individual month and trends across months.

- 3.3 As of 30 September 2020, the Brent Pension Fund had 23,265 members, which was made up of:
- 6,806 active members
 - 7,090 pensioners (including dependants)
 - 9,369 deferred beneficiaries.

- 3.4 Figure 1 shows the current age demographic of the Brent Pension Fund members. This is broken down between active, deferred and pensioner members.

Figure 1:



- 3.5 The percentage of cases completed on time has remained high with a quarterly average of 99.49%. The cases completed on time in September 2020 was 99.5% which was above the target of 98%.
- 3.6 Figure 2, provides detail on the number of cases that have processed grouped by category. At the start of July, cases brought forward totalled 1,720 and there were 1,807 outstanding cases at the end of September. The biggest increases in outstanding cases were seen in the deaths and employer estimates category.

Figure 2:

ONGOING CASEWORK AT THE END OF THE REPORTING QUARTER

	Brought Forward	Completed	Received	Outstanding
New Starters	117	433	376	60
Transfer In	168	115	92	145
Transfer Out	69	104	87	52
Estimate - Individual	25	119	130	36
Deferred Benefits	301	652	622	271
Deaths	383	228	301	456
Retirements (Immediate)	23	19	36	40
Retirements (Deferred)	317	118	110	309
Refunds	72	195	192	69
Estimates - Employer	11	187	227	51
Correspondence	21	223	237	35
Aggregation	68	99	95	64
Other (see Definitions – page 3)	145	280	354	219

- 3.7 Helpdesk call performance measures the average wait time and calls answered. The Fund is disappointed with average wait times of 4 minutes and 48 seconds in July and August however September has shown improved performance of 2 minutes 29 seconds, which was closer to the target time of 2 minutes. The fund will be working with LPP to understand the reasons behind the delayed timings. The average calls answered should be 90% but in July it was below average with only 84.9% of calls being answered but this picked up in August and September and was above the target of 90%.
- 3.8 Service improvements delivered include the launch of a bereavement survey, an in-house bulk email solution procured and mortality tracing and address screening launched through Target.
- 3.9 Scheduled updates include launch of single website for all Members and Employers which is due in November 2020, members surveys to launch for estimates and transfers and a 'Livechat' feature to be available on the new website.
- 3.10 Since July 2020, 8 new complaint cases have been received. This included 3 new complaints in July, 2 new complaints in August and 3 new complaints in September. Out of the 3 cases in September, 2 related to delays and 1 related to general service. 1 of the delayed complaints have been resolved and 2 are outstanding. Brent and LPP are taking action to ensure that these cases are resolved swiftly however the complex nature of some cases means that this is not always possible. In addition, following the completion of each case, a process is undertaken to ensure any lessons learned are reviewed and consequently, if necessary, processes and procedures will be updated.

4.0 Annual Benefit Statements

- 4.1 It is a statutory responsibility for the scheme manager to issue an annual benefit statement (ABS) to all eligible active and deferred members by 31 August each year.
- 4.2 For active and deferred members, an ABS was issued online to all members identified on year end returns from employers by the deadline of 31 August 2020. Any members who have opted out of electronic communications will have received a printed copy of their ABS through the post.
- 4.3 The production of an ABS requires scheme employers to submit an end of year return. Overall, the timeliness of year-end returns from employers was disappointing this year, with many employers missing the 30th April deadline. Fund officers and LPP commenced an exercise in the summer to ensure that all returns were submitted, escalating to senior management where necessary. All returns were eventually received.
- 4.4 There were a small number of records where queries from year end returns had not been resolved in time. For these members an ABS could not be produced as employers had not been forthcoming with the relevant information. These outstanding queries are being monitored by LPP and as soon as the queries are resolved an ABS will be issued.
- 4.5 The Pensions Administration Strategy allows the scheme manager to take actions against employers that do not comply with their statutory and legal obligations to the Pension Fund. These actions will be considered should employers not respond to LPP's requests for information in a timely manner.
- 4.6 As outlined below, the Fund is carrying out a focussed exercise with a dedicated resource to clear historical unprocessed leavers. Due to this issue, it has not been possible to issue an ABS to these members. The project will be resolving these records and an ABS will be made available to these members as soon as possible. This project is expected to be completed by 31st March 2021.
- 4.7 As part of The Pensions Regulators Code of Practice, employers and other individuals involved in running a pension scheme have a legal duty to report a breach of the law where it is likely to be of material significance to the regulator. In order to clarify the decision making process with regards to reporting breaches, a breaches policy for the Brent Pension Fund was produced and agreed by the Pension Board in July 2018. This is attached as appendix 1 for reference. At this stage, it is not considered to be a material breach to report to TPR. The main considerations for this decision are set out below.
- In relation to active members, prompt action has been taken and a plan has been put in place to resolve the outstanding issues as soon as reasonably practical.
 - The scheme manager will work closely with LPP and employers to resolve the outstanding queries as soon possible, treating the overall exercise as a high priority.

- The Pensions Administration Strategy provides the scheme manager with the powers to take action against employers who not comply with the standards set out in the strategy.

5.0 Data Cleanse and GAD Valuation

- 5.1 Following the transition to LPP on 1 October 2018, regular monthly contract performance meetings have been arranged where performance against agreed service level agreements has been discussed.
- 5.2 In addition, a separate project was commissioned to review, cleanse and fix any errors identified in member data. This was to ensure that the Fund's data scores were compliant with The Pensions Regulator's expectations (for common and conditional data) and that the 2019 valuation was as accurate as possible.
- 5.3 The first phase of the project was completed ahead of submission of membership data for the 2019 triennial valuation.
- 5.4 Following feedback received from the 2019 valuation process and the recent analysis of the initial data exercise from GAD, the Fund is aware of records that are historical missing leavers which remain unsolved.
- 5.5 As part of business as usual, LPPA continue to work through year end query responses received from employers. However, in many cases, the responses received are not sufficient to process the leaver cases. Additionally, the Fund has carried out several initiatives to improve employer engagement including training sessions and Employers forums. Due to the age of the cases and considering that many employers have changed payroll providers, it has proven difficult to resolve these queries as part of business as usual.
- 5.6 Therefore, the Fund has commissioned a separate project to review and resolve these outstanding leaver queries. This will ensure that additional dedicated resources can be put in place until 31st March 2021 in order to ensure that this issue can be resolved as quickly as possible. Should a dedicated project not be commissioned, it is likely that these cases will remain un-solved into 2021/22 and continue to impact Brent's data scores.
- 5.7 The process for clearing the leavers will depend on the case. Options include: using data available through previous end of year returns, contacting the employer to resolve the query, reviewing archives for leaver information or contacting the member for payslip/P60 information.
- 5.8 1,385 missing leaver queries have been identified as within the scope of the project and the Fund will receive weekly updates on progress against the project from LPPA. The work began as planned on 12th October and good progress has been made initially. The starting position was 1,385 unprocessed leavers and the latest position at the time of writing was 1,281, a reduction of 104.

- 5.9 The project team includes an experienced member of the administration team who has relevant experience in handling complex cases. The project runs until 31st March 2021 however the Fund will review progress in December 2020. Should the project be unsuccessful, it will be stopped at this point. The full cost of the project (to March 2021) is in the region of £75,000. The Fund's record keeping plan will be updated to reflect this new phase of the data cleanse project incorporating new activities that are being undertaken.
- 5.10 The Fund does not consider doing nothing as a viable option for these cases. It has become clear over recent months that due to the complex nature of these queries, it will not be possible to resolve these in a timely through business as usual (BAU). Furthermore, lack of action will continue to pose a risk for the Fund including, but not limited to:
- Errors remaining on records at the next valuation therefore requiring assumptions to be made.
 - A material impact on the Fund's TPR data score, in particular the conditional score which records scheme specific data.
 - The GAD (Government Actuary Department) require good quality data to be submitted for their analysis of LGPS funds.

6.0 Consultations

- 6.1 In recent months, a number of consultations that relate directly to the LGPS and the wider pensions sector have been published.
- 6.2 As reported to the previous Pension Board, The Ministry of Housing, Communities and Local Government (MHCLG) had published a consultation on the proposed remedies for the LGPS to remove age discrimination following the McCloud judgement. This consultation ran for 12 weeks to 8 October and the Brent Pension Fund submitted a response prior to the deadline. MHCLG are in the process of analysing feedback and the outcome is due to be released shortly.
- 6.3 In addition to the HM Treasury £95k exit payments cap, on 7 September 2020 MHCLG launched a consultation on changes to the LGPS and compensation regulations. The consultation covers the required changes to regulations to introduce the £95k cap and bring the exit compensation terms for local government workers in line with the framework set out by the Government in September 2016. The consultation document is attached in appendix 2.
- 6.4 As part of the proposals, certain members aged 55 and over receiving statutory redundancy payments will lose the right to receive unreduced pensions where a pension strain is payable. Further detail on the proposals is provided in the actuarial update on this agenda.
- 6.5 The consultation closes on 9 November 2020. Comments from any member of the Board regarding the consultation should be sent to Ravinder Jassar ahead of the closing date.

6.6 On 6 April 2016, the government introduced the new State Pension (nSP). The reformed system simplified pension provision but removed the mechanism that enabled those public servants in 'contracted-out' employment between 1978 – 1997 to have their Guaranteed Minimum Pension (GMP) fully price protected. An interim solution was introduced, which was later consulted on and extended until 5 April 2021.

6.7 On 7 October 2020, the government published consultation on how it proposes to ensure it continues to meet these past commitments to public service employees regarding the full indexation of public service pensions, including for any related GMP element for members of public service pension schemes. The consultation considers the policy options available to the government and is open until 30 December 2020.

7.0 Financial Implications

7.1 As outlined in section 5 of the report, LPPA have been commissioned to undertake a separate project in order to process historical 'missing' leavers. Should the project run to end March 2020, the cost of the project will be in the region of £75k which will be funded from the Brent Pension Fund.

8.0 Legal Implications

8.1 Not applicable.

9.0 Equality Implications

9.1 Not applicable.

10.0 Consultation with Ward Members and Stakeholders

10.1 Not applicable.

11.0 Human Resources

11.1 Not applicable.

Report sign off:

Minesh Patel
Director of Finance

This page is intentionally left blank



Brent

London Borough of Brent

Breaches Policy

Table of Contents

1. Breaches Policy.....	3
2. Overview	3
3. Responsibilities Breaches	4
4. Reporting Requirements	4
5. Breaches required to be reported.....	4
6. Assessing reasonable cause.....	5
7. Determining if a breach is materially significant	5
8. Process for reporting breaches	8
9. Responsible officer.....	8
10. Maintaining Breaches Record	9
11. Whistleblowing.....	9
12. Training	9

1. Breaches Policy

The London Borough of Brent Pension Fund (“the Fund”) Breaches Policy sets out policy and procedures on identifying, managing, and reporting breaches of the law as covered in paragraphs 241 to 275 of The Pensions Regulator’s Code of Practice no 14, Governance and administration of public service pension schemes.

This policy sets out the responsibility of elected members, officers of The London Borough of Brent (“the Council”), and the Brent Pension Board in identifying, managing and where necessary reporting breaches of the law as they apply to the management and administration of the Fund.

This policy does not cover the responsibility of other reporters in relation to their obligation to report breaches in accordance with the Code of Practice where they relate to the management and administration of the Fund.

Where a breach of the law is identified all parties will take the necessary steps to consider the breach and report it to the Regulator, rather than having the breach solely reported by any of the other reporters.

This policy will be reviewed and approved by the Council annually. The Council will monitor all breaches and will ensure that adequate resources are allocated to managing and administering this process.

The Council’s Section 151 Officer is responsible for the management and execution of this breaches policy.

The Chair of the Pension Board will ensure that training on breaches of the law and this policy is conducted for all relevant officers and elected members.

2. Overview

The identification, management and reporting of breaches is a required by the Code of Practice.

In addition to identifying, rectifying and where necessary reporting a particular breach, such breaches will be used to review and improve processes in the areas where the breach occurred.

All staff involved in the administration and management of the Fund will take a proactive approach to the identification, management and reporting of all breaches that have occurred, or are likely to occur.

The Council, as the scheme manager for the Brent Pension Fund, will maintain a log of all breaches of the law (Breaches Log) as applicable to the management and administration of the Fund.

Where a breach has occurred it will be identified and logged as either an area of non-compliance under the LGPS Regulation, a breach under Pension Law as defined within section 13 of the 2004 Pension Act, or the Pension Regulator’s Code of Practice 14.

Where a breach has occurred and has been identified by the Council, officers or members of the Pension Board, or our third party administrators, it will be recorded, assessed and where necessary reported as soon as reasonably practicable.

3. Responsibility Breach Reporting

Responsibility to report identified breaches of the law in relation to the Code of Practice falls on the following (known as “reporters”):

- Elected members and officers of the Council (the Scheme Manager);
- Members of the Pension Board;
- Scheme employers;
- Professional advisers including the Fund actuary, investment advisers, legal advisers;
- Third party providers (where so employed).

This policy applies only to elected members and officers of the Council, and members of the Pension Board. It is for the other reporters to ensure adequate procedures and policies are put in place in order to identify, assess and where necessary report breaches. Both the Council and the Pension Board will take all necessary steps to consider the breach and report to the Regulator, rather than having the breach solely reported by any of the other reporters.

4. Reporting Requirements

Breaches of the law which affect pension schemes will be considered for reporting to the Pensions Regulator.

The decision whether to report an identified breach depends on whether:

- there is reasonable cause to believe there has been a breach of the law
- and if so, is the breach likely to be of material significance to the Regulator.

All incidents of breaches identified are recorded in the Council’s Breaches Log. This log is reviewed on an on-going basis to determine if there are any occurrences that indicate any serious failings or fraudulent behaviour. Where such failings or fraudulent behaviour are identified immediate action will be taken to put in place a plan of action to rectify the matter and prevent such an occurrence in the future.

5. Breaches required to be reported

A breach will be notified to the Regulator as soon as is reasonably practicable once there is reasonable cause to believe that a breach has occurred and that it is of material significance to the Regulator. Where a breach is considered to be of material significance it will be reported to the Regulator no later than one month after becoming aware of the breach or likely breach.

Where it is considered that a breach is of such significance that the Regulator is required to intervene as a matter of urgency, the matter will be brought to the attention of the Regulator immediately. A formal report will then be submitted to the Regulator marked as urgent.

6. Assessing reasonable cause

The Council and the Pension Board must be satisfied that a breach has actually occurred rather than acting on a suspicion of such an event.

Robust checks will be made by officers and elected members when acting on any suspicion of a breach having occurred drawing on legal advice from Brent's legal services and specialist external legal advice if necessary, as well as other advisers such as internal or external audit, the Fund actuary or investment advisers.

7. Determining if a breach is materially significant

When determining the materiality of any breach or likely breach, Council officers and the Pensions Board will consider the following:

- cause, e.g. dishonesty, poor governance, incomplete or inaccurate information, acting or failing to act in contravention of the law;
- effect, does the nature of the breach lead to an increased likelihood of further material breaches;
- reaction – e.g. taking prompt and effective action to resolve a breach, notifying scheme members where appropriate; and
- wider implications – e.g. where a breach has occurred due to lack of knowledge or poor systems and processes making it more likely that other breaches will occur in the future.

The Council uses The Pensions Regulator's decision tree as a means of identifying whether any breach is to be considered as materially significant and will need to be reported to the Regulator.

Green breach situations are not of material significance and do not have to be reported but should be recorded.

- **Green** – not caused by dishonesty, poor governance or a deliberate contravention of the law and its effect is not significant and a plan is in place to rectify the situation. In such cases the breach will not be reported to the Regulator, but will be recorded in the Council's Breaches Log.

Amber breach situations are less clear cut; a reporter must take into account the context of the breach in order to decide whether it is of material significance and should be reported.

- **Amber** – does not fall easily into either green or red and requires further investigation in order to determine what action to take. Consideration of other recorded breaches may also be relevant in determining the most appropriate course of action. The Council will make a decision on whether to informally inform the Regulator of the breach or likely breach, formally reporting the breach if it is subsequently decided to categorise the breach as red.

Red breach situations are always of material significance to the Pensions Regulator and should be reported.

- **Red** - caused by dishonesty, poor governance or a deliberate contravention of the law and having a significant impact, even where a plan is in place to rectify the situation. The Council will report all such breaches to the Regulator.

Once a breach or likely breach has been identified the relevant officer, in consultation with the Section 151 Officer, will review the circumstances of the breach in order to understand why it has occurred, the consequences of the breach and agree the corrective measures required to prevent re-occurrence, including an action plan where necessary.

All breaches will be recorded in the Council's Breaches Log.

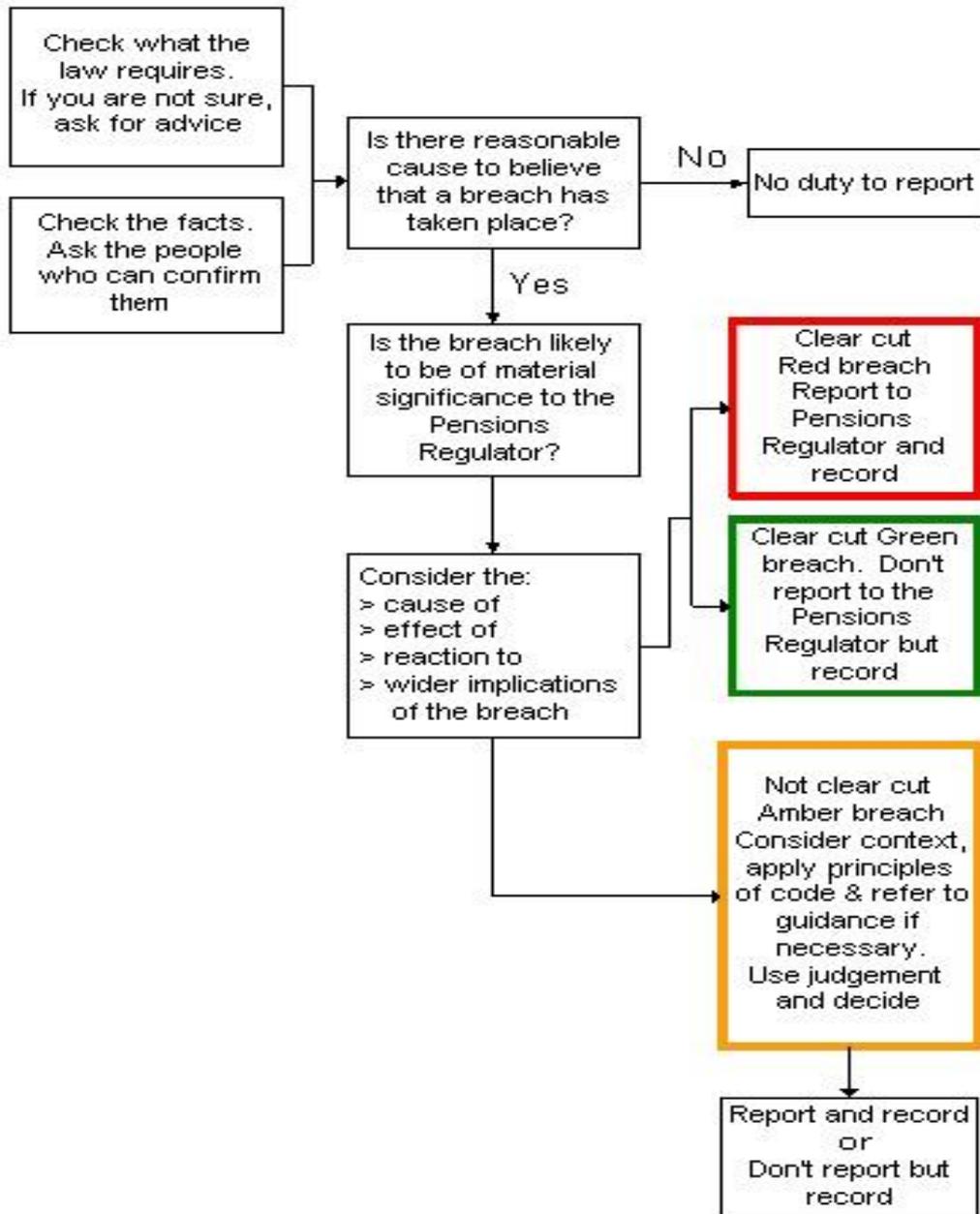
The Pensions Regulator Decision Tree

Deciding whether to report:

1. Reasonable cause to believe that a breach has taken place
 - No No duty to report
 - Yes Go to 2.

2. Is the breach likely to be of material significance, consider the:
 - Cause of
 - Effect of
 - Reaction to
 - Wider implications of the breach

The Pensions Regulator Decision Tree



8. Process for reporting breaches

All relevant officers and members of the Pension Board have a responsibility to:

- identify and assess the severity of any breach or likely breach
- report all breaches or likely breaches to the section 151 officer
- in conjunction with relevant colleagues agree a proposed course of action to rectify the breach and put in place measures to ensure the breach does not re-occur, and obtaining appropriate legal or other advice where necessary
- ensure that the appropriate corrective action has been taken to rectify the breach or likely breach and to prevent it from re-occurring
- co-operate with and assist in the reporting of breaches and likely breaches to the Pensions Board, and where necessary, the Regulator.

9. Responsible officer

The Section 151 Officer will be responsible for recording and reporting breaches and likely breaches as follows:

- record all identified breaches and likely breaches of which they are aware in the Councils Breaches Log
- investigate the circumstances of all reported breaches and likely breaches
- ensure where necessary that an action plan is put in place and acted on to correct the identified breach and ensure further breaches of a similar nature do not re-occur.

Report to the Pension Fund Sub Committee and Pension Board:

- all materially significant breaches or likely breaches that will require reporting to the Regulator as soon as practicable, but no later than one month after becoming aware of the breach or likely breach
- all other breaches at least quarterly as part of the Committee cycle

The Section 151 Officer will determine whether any breach or likely breach is materially significant having regard to the guidance set out in the Code of Practice and after consultation with parties they deem appropriate.

If appropriate, the matter will be referred to specialist advisors, such as Legal, the Fund actuary, audit or other advice before deciding if the breach is considered to be of material significance to the Regulator.

10. Maintaining breaches record

All breaches and likely breaches identified will be reported to the Section 151 Officer as soon as they are identified. All breaches will be recorded on the Council's breaches log, including the following information:

- date the breach or likely breach was identified
- name of the scheme
- name of the employer where appropriate
- any relevant dates
- a description of the breach its cause and effect including the reasons it is or is not believed to be of material significance

- whether the breach is considered to be red, amber or green
- a description of the actions taken to rectify the breach
- a brief descriptions of any longer term implications and actions required to prevent similar types of breaches recurring in the future.

The Section 151 Officer is responsible for ensuring the effective management and rectification of any breach identified, including submission of any report to the Regulator.

Any documentation supporting the breach will be retained.

11. Whistleblowing

The Council will ensure it adheres to the requirements of the Employment Rights Act 1996 in protecting an employee making a whistleblowing disclosure to the Regulator.

12. Training

The Section 151 officer will ensure that all relevant officers and members of the Pension Board receive appropriate training on this policy at the commencement of their employment or appointment to the local pension board as appropriate and on an ongoing basis.

End.

This page is intentionally left blank



Ministry of Housing,
Communities &
Local Government

Reforming local government exit pay

A consultation on the reform of exit payments in local government



© Crown copyright, 2020

Copyright in the typographical arrangement rests with the Crown.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/> or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gov.uk.

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

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

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

September 2020

Contents

1. Scope of the consultation	4
2. Introduction.....	6
3. Reforms to public sector exit payments	8
4. Proposals for reforms to exit payments in local government	9
5. Impact analysis	12
6. Next Steps.....	15
7. Consultation Questions	16
Annex A - Personal data	17
Annex B - About this consultation.....	19

1. Scope of the consultation

A consultation paper issued by the Ministry of Housing, Department for Communities and Local Government, on behalf of the Secretary of State.

Topic of this consultation:	As part of a wider programme of cross-public sector action on exit payment terms, this consultation paper sets out the government’s proposals for reforming local government exit payment.
Scope of this consultation:	The Ministry of Housing, Communities and Local Government is consulting on proposals to reform exit payment terms for local government workers, and specifically those who are eligible to be members of the local government pension scheme
Geographical scope:	The reforms would apply to those areas which are the responsibility of the UK government. It would be for the Scottish government, Welsh government and Northern Ireland Executive to determine if and how they wanted to take forward similar arrangements in relation to devolved bodies and workforces.
Impact Assessment:	The government believes, to a large extent, any impact on protected groups as a result of these reforms would simply be a natural consequence of the composition of the local government workforce and does not believe that there would necessarily be disproportionate impacts on particular groups aside from this. However, following this consultation, an impact assessment will be produced to examine whether this is the case; the government will carefully consider its policy in the light of that assessment.

Basic Information

Topic of this consultation:	This consultation is open to everyone. We particularly seek the views of local government, Trade Unions and other workforce representatives.
Body responsible for consultation:	The Local Government Strategy and Improvement team in the Ministry of Housing, Communities and Local Government is responsible for conducting the consultation.
Duration :	The consultation will last for 9 weeks from 7 September 2020. All responses should be received by no later than 9 November 2020.
Enquiries and responses:	During the consultation, if you have any enquiries, please contact: LGExitPay@communities.gov.uk <u>How to respond</u> Responses can be submitted online at:

https://forms.office.com/Pages/ResponsePage.aspx?id=EGg0v32c3kOociSi7zmVqDX2xIA9hPhJv2EHTx_8-ZUQTdZUKlxOFBJTjU2RjFEQzY4WIIHSUoyNy4u

or sent by email to:

LGExitPay@communities.gov.uk

with the subject heading 'Consultation on Exit Payment Cap'.

Due to current restrictions on office access, responses sent by post may have a delay in reaching our team.

By post, please address your response to:

Exit Pay Consultation
Local Government Workforce and Pay Team,
Ministry for Housing, Communities and Local Government
2nd Floor, Fry Building
2 Marsham Street
London
SW1P 4DF

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

2. Introduction

2.1 Redundancy provision and exit payments play an important role in enabling employers to reform and reorganise. They support employees during the transition to other employment or retirement following the loss of employment. However public sector arrangements vary significantly, including in the benefits provided for people with similar pay and length of service. Also, such provisions can often be out of line with practice in the wider economy.

2.2 The government announced in the Spending Review and Autumn Statement 2015 that it will continue to modernise the terms and conditions of public sector workers, by taking forward targeted reforms in areas where the public sector has more generous rights than most of the private sector. As part of this, the government committed to consulting on further cross public sector action on exit payment terms, to reduce the costs to the taxpayer of redundancy payments and ensure greater consistency between workforces. The government is therefore consulting on options to make public sector exit compensation terms fairer, more modern and more consistent.

2.3 **Taking forward exit payment reform proposals**

The Spending Review 2015 announced the government's intention to consult on cross-public sector action on exit payment terms, to reduce the costs of redundancy pay-outs and ensure greater consistency between workforces. This consultation, launched in February 2016, set out that the government would consider three key principles to underpin reform: fairness; modernity and flexibility; and greater consistency. It set out a package of proposed maximum levels for the calculation of different elements of exit packages to apply across the public sector, subject to negotiation at workforce level.

2.4 In September 2016, the government published a response to this initial consultation. Around 350 responses were received, from trade unions; public sector employers and employer organisations; and public sector workers and others responding in an individual capacity. The initial consultation document and the government's response can be accessed via this link: www.gov.uk/government/consultations/further-consultation-on-limiting-public-sector-exit-payments

2.5 **The current system for local government redundancy compensation payments**

Local government lump-sum redundancy arrangements vary considerably between employers. However, they must operate within a framework set by regulations. Those regulations are the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006 ("the 2006 Regulations")¹. These regulations provide that the total maximum lump-sum pay-out is 104 weeks' (24 months') pay, although most local authorities currently provide for less than this.

¹ Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006 SI/ 2914 <http://www.legislation.gov.uk/uksi/2006/2914/made>

2.6 The current system for local government early access to pensions

Under Regulation 30(7) of the Local Government Pension Scheme Regulations 2013² employees aged 55 or more who are members of the Local Government Pension Scheme (LGPS) are currently entitled to immediate access to unreduced pension where:

- The member is dismissed from an employment on redundancy or business efficiency grounds, or
- The employment is terminated by mutual consent on business efficiency grounds.

An employer participating in LGPS which provides early unreduced payment of pension benefits has to make additional payments to the relevant pension fund to make up the resulting shortfall in the pension funding. This is because provision for early exits is not included in their standard employer contributions. This extra payment is also known as the pension strain cost³.

The purpose of this consultation

2.7 This consultation is **not** seeking views or representations on the government's position regarding exit pay reform. The framework for reform has been produced following extensive consultation led by HM Treasury. Instead, this consultation is seeking information on:

- The effect/s that the proposals for reform outlined below will have on the regulations which currently govern exit payments (including both redundancy compensation pay and early access to pensions) in local government.
- The impact that the proposals for reform outlined in paragraph 3.4 will have on the local government workforce. Consultation responses will inform a full impact assessment, including equalities considerations which will be issued alongside the regulations when these are laid before Parliament.

² The Local Government Pension Scheme Regulations 2013
<http://www.legislation.gov.uk/ukxi/2013/2356/regulation/30/made>

³ The precise arrangement by which strain cost is paid varies between funds. Some funds ask for payment on a case by case basis, others may have allowed for a certain number of exits in setting the regular contribution level. In those cases, if experience differs from what is assumed then this is taken into account when that employers contributions are next adjusted.

3. Reforms to public sector exit payments

3.1 The government believes that it is an important principle that exit arrangements are determined at workforce level. However, given that exit arrangements in all workforces are ultimately funded by the taxpayer, it is clearly appropriate for the government to ensure that these provide value for money.

3.2 However, the government legislated for a cap of £95,000 for all exit payments in the public sector in the Small Business Enterprise and Employment Act 2015 (later amended by the Enterprise Act 2016). The 2015 Act sets out the duty to implement the cap through secondary legislation and HMT carried out a consultation on a Public Sector Exit Payment Cap in 2019 which proposed introducing a cap of £95,000 on the total value of exit payments across the Public Sector (although with some exceptions under consideration). That consultation was completed and regulations for this were laid on 21 July 2020.

The response to the consultation is available here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902087/Public_sector_exit_payments_Consultation_response.pdf

3.3 The government believes that an approach of individual sector workforce negotiations within an overarching framework strikes the right balance in ensuring fairness to the individual and the taxpayer and ensuring that there is greater consistency between schemes while recognising the differences between workforces. This consultation therefore contains proposals to implement the measures specifically for the local government workforce.

3.4 The overarching framework was set out in the Government Response published in February 2016⁴. The key elements can be summarised as:

- A maximum of three weeks' pay per year of service;
- A maximum of 15 months on the amount of a redundancy payment;
- A maximum salary of £80,000 on which an exit payment can be based;
- Limiting publicly funded pension top-ups;
- A £95k cap on the total of all forms of compensation, including redundancy payments, pension top-ups, compromise agreements and special severance payments.

⁴ <https://www.gov.uk/government/consultations/further-consultation-on-limiting-public-sector-exit-payments>

4. Proposals for reforms to exit payments in local government

4.1 The government has asked those government departments responsible for the main public sector workforces to negotiate and agree reforms directly with each sector. MHCLG is therefore leading on local government workforce reform⁵.

4.2 Total exit payments will be capped at £95,000 in line with HMT's proposed reforms.

4.3 Following preliminary discussions with local government sector representatives, MHCLG's proposals to reform redundancy payments in local government are as follows:

- a) A maximum tariff for calculating exit payments of three weeks' pay per year of service. Employers could apply tariff rates below these limits.
- b) A ceiling of 15 months (66 weeks) on the maximum number of months' or weeks salary that can be paid as a redundancy compensation payment. Employers will have discretion to apply lower limits, as they do at present under 2006 Regulations.
- c) A maximum salary of £80,000 on which a redundancy compensation payment can be based, to be reviewed on an annual basis using an appropriate mechanism, for example: CPI (Consumer Prices Index).

Question 1:

Are there any groups of local government employees that would be more adversely affected than others by our proposed action on employer funded early access to pension?

If so, please provide data/evidence to back up your views.

How would you mitigate the impact on these employees?

Question 2:

What is the most appropriate mechanism or index when considering how the maximum salary might be reviewed on an annual basis?

Question 3:

Are there any groups of local government employees that would be more adversely affected than others by our proposed ceiling of 15 months or 66 weeks as the maximum number of months' or weeks salary that can be paid as a redundancy payment?

If so, please provide data / evidence to back up your views.

How would you mitigate the impact on these employees?

⁵ These proposals will cover all employers which participate in the LGPS and are named in Schedule x of the draft Exit Payment Regulations, which are due to be made under s153A of the Small Business, Enterprise and Employment Act 2015.

Question 4:

Are there any groups of local government employees that would be more adversely affected than others by our proposal to put in place a maximum salary of £80,000 on which an exit payment can be based?

If so, please provide data / evidence to back up your views.

How would you mitigate the impact on these employees?

4.4 Most importantly we wish to introduce an element of choice into the current arrangements. At present, employees may have no option but to take immediate payment of their pension on being made redundant. That means that they cannot accrue further benefits (in that employment) and it sends a signal that their working life is over. In the modern world of work, people have good reasons for wanting to work longer and someone made redundant in their late 50's may still look forward to a satisfying career for many years to come. However, we recognise that for those who have done demanding work throughout their adult lives, they should have the security of a reliable income with a suitable enhancement.

4.5 We therefore propose that for members of the LGPS who are at least 55 years old when made redundant, the benefits and the associated strain cost due from the employer should be limited as follows:

- The strain cost cannot exceed the overall cap contained in the Exit Payment Regulations (£95k)
- Strain cost will be further reduced by the value of any Statutory Redundancy Payment required to be paid (which the employee will still receive as a cash payment)
- A further reduction would be made to reflect any voluntary payments made to cover grant of additional pension under regulation 31 of the LGPS Regulations 2013
- Any reduction in the strain cost due to the above limitations may be made up by the worker from his own resources
- The member will receive an actuarially adjusted pension benefit in line with the revised strain cost under these provisions.

4.6 Where the employer pays any amount of strain cost in respect of an employee's exit, an employer may not grant an employee any discretionary redundancy payment. However, in the rare cases where the discretionary payment would have had a higher value than the strain cost the member will be entitled to take the pension enhancement delivered by the strain cost due under paragraph 4.5 plus a cash payment equal to the difference between the strain cost and discretionary redundancy payment.

4.7 However, the member can choose to forgo the pension enhancement due under paragraph 4.5 and instead receive an actuarially reduced pension (using standard early retirement factors) and take the discretionary redundancy payment to which they would be entitled under their employer's redundancy scheme, subject to it being consistent with the proposals at paragraph 4.3 above.

4.8 We are also proposing to grant employees a further option which would be to defer their pension benefits (as accrued, with no enhancement and not coming into immediate payment) and to receive the discretionary redundancy payment under their

employer's redundancy scheme, subject to it being consistent with the proposals at paragraph 4.3 above.

4.9 As the effect of these provisions and the cap established by the Exit Pay Regulations will be the same for all pension funds in England, we believe that it would be appropriate to have a consistent approach taken to the calculation of strain costs between funds. Hence the Secretary of State has asked the Government Actuary's Department to provide actuarial guidance on this for funds to follow. We will consult on this actuarial guidance in due course.

Relaxation of the cap

4.10 There will be some circumstances where it is necessary or desirable to relax the overall cap on benefits set out in the Exit Payment Regulations (£95k). Therefore, the regulations allow for discretionary relaxation of the cap in exceptional circumstances, including where imposing the cap would cause genuine hardship.

4.11 The full council of a local authority has a delegated power to relax the cap in relation to local government bodies for which it has responsibility. The London Assembly has the power to relax in respect of exit payments made by the Greater London Authority.

4.12 The power to relax must be exercised in accordance with the mandatory directions in section 5 of the HMT statutory guidance to the Exit Payment Regulations. In line with that guidance, all requests by LGPS scheme employers to relax the cap must be approved by the appropriate Minister of the sponsoring department. For local councils that will the Secretary of State for Housing, Communities and Local Government.

4.13 There may be circumstances in which our Minister cannot approve a business case for relaxation in accordance with the mandatory directions but believes the cap should be relaxed on a discretionary basis. In these circumstances, MHCLG Ministers will require agreement from HMT Ministers to approve the relaxation.

Question 5:

Do you agree with these proposals? If not, how else can the Government's policy objectives on exit pay be delivered for local government workers?

Question 6:

Do you agree that the further option identified at paragraph 4.8 should be offered?

Question 7:

Are there any groups of local government employees that would be more adversely affected than others by our proposals?

If so, please provide data/ evidence to back up your views.

How would you mitigate the impact on these employees?

5. Impact analysis

5.1 Economic and fiscal impacts

Analysis of economic impact is being carried out for MHCLG by the Government Actuary Department. We will consult on this separately in due course.

5.2 Social impacts – including distributional and equalities

The Office for National Statistics (ONS) Labour Force Survey evidence suggests that the public sector has a significantly greater proportion of women and older workers than the workforce population as a whole, as well as slightly greater proportions of those with other protected characteristics, including disability. However, within this there are significant variations between different workforces.

5.3 MHCLG will produce a full impact assessment, including equalities considerations, and the government will carefully consider these impacts in making decisions on the appropriateness or otherwise of proposed reforms in each workforce. We are seeking more information to feed into the equalities assessment via this consultation document.

5.4 The government believes, to a large extent, that any impact on protected groups as a result of these reforms would simply be a natural consequence of the composition of these workforces and does not believe that there would necessarily be disproportionate impacts on particular groups aside from this.

5.5 Environmental impacts

This policy is assumed to have no tangible environmental impacts.

5.6 Costs and benefits – direct and indirect

The policy would produce a benefit to employers in terms of reductions in redundancy compensation payments which would contribute more widely to the public finances. The potential effects include: the reduction in redundancy compensation to affected employees (which the government believes is justified on grounds of fairness and affordability), and administrative costs to employers of implementing the necessary changes to their redundancy compensation arrangements.

5.7 Regulatory impact

This policy primarily affects the public sector and so is not expected to increase regulation on private business in the wider economy. Depending on final decisions on the scope of the Exit Payment Regulations, the policy may also have an impact on bodies employing staff previously from the public sector who are subject to Transfer of Undertakings (Protection of Employment) (TUPE) rules. These impacts cannot be quantified at this stage.

Question 8:

From a local government perspective, are there any impacts not covered at Section 5 (Impact Analysis) which you would highlight in relation to the proposals and/or process above?

5.8 Employees receiving pay and pension concurrently

To provide greater transparency in local authorities and give local taxpayers the information they need to hold authorities to account about how they spend their money, each local authority is required to have its own policy on the abatement of pension benefits when people in receipt of a local government pension are re-employed in local government.

5.9 Clearly, the purpose of a pension is to provide an income in retirement.

Therefore, local authorities should use their pay policy statements, which they are required by the Localism Act 2011 to prepare and publish annually, to explain their policies toward the reward of chief officers who were previously employed by the authority and who, on ceasing to be employed, were in receipt of a severance payment from that authority. Public bodies should seek to:

- Safeguard public expenditure, by restricting the total remuneration made from public funds for those who have not genuinely retired from a public service career;
- Avoid accusations of favouritism or even corruption if public servants, senior managers and Board Members were allowed to receive both pay and pension from public funds whilst remaining in public service, particularly if they remain in the same job, and;
- Ensure value for money is achieved and that public funding targeted through expenditure and tax relief at long-term retirement provision is focussed on retirement or preparation for retirement, rather than being used during part of an employee's working life.

Question 9:

Are these transparency arrangements suitably robust? If not, how could the current arrangements be improved?

5.10 This should include any local policy towards ex-employees later engaged as chief officers under a contract for services. Public authorities - which include local authorities - will be aware of their obligations, namely that if they plan to offer a temporary job to someone who works through their own intermediary (this is often their own company) they will need to decide whether the off-payroll working rules (known as IR35) apply. These off-payroll working rules are in place to make sure that where an individual would have been an employee if they were providing their services directly, they pay broadly the same tax and National Insurance contributions (NICs) as an employee.

5.11 Similarly, authorities should include their policies toward the reward of chief officers who are also in receipt of a pension under the Local Government Pension Scheme. These policies should take account of their agreed approach on abatement of pensions.

Question 10

Would any transitional arrangements be useful in helping to smooth the introduction of these arrangements?

Question 11

Is there any other information specific to the proposals set out in this consultation which is not covered above which may be relevant to these reforms?

6. Next Steps

6.1 Individual government departments are now working to negotiate, agree reforms and then implement them with specific public sector workforces. For reference, HMT's consultation on reforming exit payments in the public sector as a whole can be found at: <https://www.gov.uk/government/consultations/consultation-on-a-public-sector-exit-payment-cap/consultation-on-a-public-sector-exit-payment-cap>. MHCLG is therefore leading on local government exit pay reform.

6.2 Where applicable, implementation will be through changes to secondary regulations. The government will reserve the ability to set a reform framework in future primary legislation depending on progress in implementing the reforms.

6.3 The government would ensure any reforms do not breach the provisions of the Public Service Pensions Act 2013. Employees would remain entitled to pensions they have accrued during their employment and there would be no change to the age at which 'normal' retirement is available under existing scheme terms.

6.4 The government will carefully consider impacts around equalities and the economic and fiscal landscape as well as the practical implications of implementing any reforms.

In undertaking this consultation, we ask for general information and views on these proposed reforms and the draft regulations.

Question 12

Would you recommend anything else to be addressed as part of this consultation?

7. Consultation Questions

1. Are there any groups of local government employees that would be more adversely affected than others by our proposed action on employer funded early access to pension?
 - If so, please provide data/evidence to back up your views?
 - How would you mitigate the impact on these employees?
2. What is the most appropriate mechanism or index when considering how the maximum salary might be reviewed on an annual basis?
3. Are there any groups of local government employees that would be more adversely affected than others by our proposed ceiling of 15 months or 66 weeks as the maximum number of months' or weeks salary that can be paid as a redundancy payment?
 - If so, please provide data/evidence to back up your views?
 - How would you mitigate the impact on these employees?
4. Are there any groups of local government employees that would be more adversely affected than others by our proposal to put in place a maximum salary of £80,000 on which an exit payment can be based?
 - If so, please provide data/evidence to back up your views?
 - How would you mitigate the impact on these employees?
5. Do you agree with these proposals? If not, how else can the Government's policy objectives on exit pay be delivered for local government workers?
6. Do you agree that the further option identified at paragraph 4.8 should be offered?
7. Are there any groups of local government employees that would be more adversely affected than others by our proposals?
8. From a local government perspective, are there any impacts not covered at Section 5 (Impact Analysis), which you would highlight in relation to the proposals and/or process above?
9. Are these transparency arrangements suitably robust? If not, how could the current arrangements be improved?
10. Would any transitional arrangements be useful in helping to smooth the introduction of these arrangements?
11. Is there any other information specific to the proposals set out in this consultation, which is not covered above which may be relevant to these reforms?
12. Would you recommend anything else to be addressed as part of this consultation?

Annex A - Personal data

The data protection legislation is changing and a new Data Protection Act will be published in May 2018. It will give you greater powers to protect your own privacy, and place greater responsibility on those processing your data for any purpose. The following is to explain your rights and give you the information you will be entitled to under the new Act. Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

The identity of the data controller and contact details of our Data Protection Officer

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

Why we are collecting the data

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

Legal basis for processing the data

Part 2 of the draft Data Protection Bill (subject to change before it becomes an Act) states that as a government department, MHCLG may process personal data is necessary for the effective performance of a task carried out in the public interest i.e. a consultation.

With whom we will be sharing the data

We will not be sharing personal data outside of the MHCLG.

For how long we will keep the personal data, or criteria used to determine the retention period.

Your personal data will be deleted in accordance with our records retention and deletion policy which can be found on our website.

<https://www.gov.uk/government/publications/departmental-records-retention-and-disposals-policy>

Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record

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

MHCLG will not send your personal data overseas.

However, you may wish to be aware that Survey Monkey stores all data on its servers in the USA. Survey Monkey are certified under the EU-US Privacy Shield Programme which we consider to be adequate to protect the type of personal data we need from you to respond to this consultation. More information can be found on their website at https://help.surveymonkey.com/articles/en_US/kb/I-am-in-Europe-How-do-SurveyMonkey-s-privacy-practices-comply-with-laws-in-the-EU

This data will not be used for any automated decision making.

Annex B - About this consultation

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

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

Information provided in response to this consultation may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004.

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals with, amongst other things, obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Ministry.

Individual responses will not be acknowledged unless specifically requested.

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

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

This page is intentionally left blank

 <p>Brent</p>	<p>Pensions Board 3 November 2020</p> <hr/> <p>Report from the Director of Finance</p>
<p>Actuarial Update: COVID-19 and Regulatory Changes</p>	

Wards Affected:	ALL
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	<ol style="list-style-type: none"> 1. Brent LGPS Fund – COVID-19 and Regulatory Changes 2. LGPC Bulletin – July 2020 3. LGPC Bulletin – August 2020 4. LGPC Bulletin – September 2020
Background Papers:	<ul style="list-style-type: none"> ▪ N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Minesh Patel, Director of Finance Ravinder Jassar, Head of Finance Sawan Shah, Senior Finance Analyst Saagar Raithatha, Finance Analyst

1.0 Purpose of the Report

1.1 The purpose of this report is to assist the Pension Sub-Committee to understand the nature and impact of several recent changes to Regulations on the Fund as well as recent market movements.

2.0 Recommendation(s)

2.1 The Committee is asked to note the overall report.

3.0 Detail

3.1 This report provides a summarised overview of recent market movements and recent changes to the Fund Regulations. The full detailed paper is attached to this report in Appendix 1.

3.2 The report in Appendix 1 focuses on the following current topics:

- COVID-19
- The McCloud judgement
- Cost Management Valuations 2016 and 2020
- Public Sector Exit Payments Cap
- Goodwin ruling
- Regulation changes to support management of employer risk

COVID-19

3.3 COVID-19 has had a substantial impact on the global economy and the financial markets in 2020. This led to the Fund's funding level becoming increasingly volatile from February 2020 onwards.

3.4 The Fund experienced a sharp fall in the funding level in March however there has been some 'bounce-back' in recent months:



3.5 Many businesses and institutions in all sectors have been affected significantly by COVID-19. The impact will vary by sector and by source of funding. The majority of the Fund's employers are public sector bodies, where the covenant is strong.

3.6 The most significant impact on covenant is in respect of other employers including those who are close to exit, are not publicly-funded and/or had a weak covenant at the 2019 valuation.

The McCloud judgement

3.7 As previously reported to the committee, the outcome of the McCloud court case last summer ruled that the transition protections given (the 'underpin') to older members when the 2008 LGPS final salary scheme closed are age discriminatory.

- 3.8 This is because the transition protections given were only applicable to members within 10 years of their Normal Retirement Age as at 1 April 2012.
- 3.9 The remedy is to retrospectively apply the same protections to all members who were in the 2008 LGPS scheme on 31st March 2012. In some cases, this will mean retrospectively recalculating benefits for pensioners, and paying arrears and interest.
- 3.10 This will result in a small increase in liabilities at Fund level of c£1M or 0.1%. At whole fund level, it is not expected the McCloud remedy will have a sizable impact on the funding position and hence on employer costs. However, increases for some employers may be significantly higher.
- 3.11 From an administration perspective, the effort required to implement the remedy will be significant and it is estimated the project will take 2 years or more to complete.

Cost Management Valuations 2016 and 2020

- 3.12 The Cost Management Valuations are an ongoing national process which is resulting in current uncertainty around the benefit structure of the LGPS.
- 3.13 This mechanism works on the basis that every 3 or 4 years (the frequency varies between public sector pension schemes), a valuation at national level will be carried out by the Government Actuary's Department (GAD) on behalf of Treasury to assess the overall cost of pension provision.
- 3.14 The Government announced in January 2019 that the Cost Management valuation process would be put on hold until McCloud was resolved. The 2016 HM Treasury (HMT) cost management valuation process has recommenced and may result in changes to member benefits or member contribution rates. Any changes will be back dated to 1 April 2019. The 2020 HMT cost management valuation is expected to start shortly.

Public Sector Exit Payments Cap

- 3.15 HMT have announced that an exit payment cap of £95,000 applying to all exits from public sector employers will be in place by the end of the year. Exit payments include redundancy payments, severance payments and pension strain costs. If the total value of such payments including strain costs exceeds the £95,000 cap then an employee's pension will be reduced.
- 3.16 MHCLG have also proposed further changes to redundancy pay for public sector employees, notably that people over 55 will no longer be able to receive both redundancy pay and immediate pension in full.
- 3.17 Currently, Pension Strain Costs (the cost that an employer pays to the Fund on the early retirement of a member because of redundancy or efficiency retirement) are calculated at a local fund level. This local approach is unlikely to be suitable under the 95k cap and therefore the Ministry of

Housing, Communities and Local Government (MHCLG) have asked the Government Actuary's Department (GAD) to produce standardised factors for use in these calculations.

- 3.18 Although this policy was first announced back in 2015, there is now a very short timeframe for implementation and for the required changes to Regulations to be made. This has immediate implications for any employers planning redundancy exercises, as any quotes issued now may no longer be accurate when the time comes to pay them.

Goodwin ruling

- 3.19 The Goodwin case is another discrimination case addressing discrimination of the grounds of sexual orientation. Again, although the funding costs are small, this will be a further administration and communication burden to address.

Regulation changes to support management of employer risk

- 3.20 In May 2019, MHCLG launched its consultation "Local Government Pension Scheme: Changes to the Local Valuation Cycle and the Management of Employer Risk". The consultation sought views in the following areas:

- a) Changes to the LGPS local fund valuation cycle
- b) Increased flexibility for Funds to carry out interim valuations and/or review employer contributions between formal valuations
- c) Proposals for flexibility around employer cessation debts
- d) Proposals for policy changes for payments of employer exit credits
- e) Potential changes to employers required to offer LGPS membership.

- 3.21 The Government published a response to items (b) and (c) on 26 August with changes to regulations coming into force on 23 September 2020. Administering Authorities will now have increased powers to review employer contribution rates between valuations and to enter into repayment plans with exiting employers. It also introduces a "deferred employer" status for employers, whilst also giving employers the power to request a review of their contribution rate.

4.0 Financial Implications

- 4.1 These are set out throughout the report.

5.0 Legal Implications

- 5.1 Not applicable.

6.0 Equality Implications

- 6.1 Not applicable.

7.0 Consultation with Ward Members and Stakeholders

7.1 Not applicable.

8.0 Human Resources

8.1 Not applicable.

Report sign off:

Minesh Patel
Director of Finance

This page is intentionally left blank

Actuarial update

Brent LGPS Fund – COVID-19 and Regulatory Changes

Executive Summary

- **COVID-19** has had a substantial impact on the global economy and the financial markets in 2020, with a corresponding impact on the funding level and funding risks. It is too early to say what the long term impact could be, including the impact on mortality rates.
- The outcome of the **McCloud** court case last summer ruled that the transition protections given to older members when the 2008 LGPS final salary scheme closed are age discriminatory. The remedy is to retrospectively apply the same protections to all members who were in the 2008 LGPS scheme on 31st March 2012. This will result in a small increase in liabilities at Fund level of c£1M or 0.1%. Increases for some employers may be significantly higher. The effort required to implement the remedy will be significant and it is estimated the project will take 2 years or more to complete.
- The 2016 **HMT cost management** valuation process has recommenced and may result in changes to member benefits or member contribution rates. Any changes will be back dated to 1 April 2019. The 2020 HMT cost management valuation is expected to start shortly.
- HMT have announced that an **exit payment cap of £95,000** applying to all exits from public sector employers will be in place by the end of the year. Exit payments include redundancy payments, severance payments and pension strain costs. If the total value of such payments including strain costs exceeds the £95,000 cap then an employee's pension will be reduced.
- MHCLG have also proposed further changes to **redundancy pay for public sector** employees, notably that people over 55 will no longer be able to receive both redundancy pay and immediate pension in full.
- The **Goodwin** case is another discrimination case addressing discrimination of the grounds of sexual orientation. Again, although the funding costs are small, this will be a further administration and communication burden to address.
- The Government published a response to its consultation on "**management of employer risk**" on 26 August with changes to regulations coming into force on 23 September 2020. Administering Authorities will now have increased powers to review employer contribution rates between valuations and to enter into repayment plans with exiting employers. It also introduces a "deferred employer" status for employers, whilst also giving employers the power to request a review of their contribution rate.

Contents

Addressee and purpose.....	3
Introduction	3
1. COVID-19	4
2. The McCloud judgement	9
3. Cost Management Valuations 2016 and 2020	14
4. Public Sector Exit Payments	17
5. Goodwin ruling.....	19
6. Regulation changes to support management of employer risk	21
Summary and Next Steps.....	22
Reliances, limitations and professional notes.....	22

Addressee and purpose

This paper has been commissioned by and is addressed to the London Borough of Brent in its capacity as Administering Authority to the London Borough of Brent Pension Fund (“the Fund”). It has been prepared by Hymans Robertson LLP (as Fund Actuary) to assist the Fund’s Pension Sub-Committee to understand the nature and impact of several recent changes to Regulations on the Fund as well as recent market movements. This paper should not be used for any other purpose or published without our written consent.

Introduction

This paper addresses the following current issues, regulatory changes and processes:

1. funding and administration issues raised by COVID-19
2. McCloud (funding implications and cost)
3. Cost management valuations for 2016 and 2020
4. Proposed legislation on the £95k cap including some discussion on how it may impact on employer early retirement and redundancy strain calculations for some employers
5. Goodwin ruling regarding equality of survivor benefits in same sex marriages again including the funding implications for your Fund and employers
6. Employer contribution options, particularly around changes in contributions and potential employer exits.

1. COVID-19

COVID-19 has led to a worldwide increase in deaths and a significant shock to the global economy with large movements and increased volatility in stock market values and financial difficulties for some employers. Whilst the short-term impact on the number of deaths and the economy is significant, it is unclear at this stage what will be the medium and longer term impact.

This section focuses on what this means for the funding of defined benefit pension schemes like the Local Government Pension Scheme (“LGPS”). In particular, we consider the impact of:

- a) recent market movements on the funding level since the 2019 actuarial valuation;
- b) economic lockdown on employer covenant and risks; and
- c) the impact of higher death rates.

We also consider what measures the Fund could take to mitigate the identified risks. As the pandemic evolves, and the economic and political environment reacts, the conclusions contained within this paper may also evolve. Therefore we would recommend that the Fund and the Pension Fund Sub-Committee keep this situation and its response under regular review.

Employer funding strategies: a brief reminder

Before discussing the impact in further detail, it is useful to recap how the Fund approaches the funding of benefits to members. The focus of the funding strategy is to take a long term view and ensure that each employer’s own circumstances are taken into account. To do this, the Fund used a ‘risk based’ approach at the 2019 valuation to set contribution rates for all employers.

For each employer, three elements were considered:

1. What is the funding target?

The target is determined using the assumptions that were agreed at the valuation and described in the Funding Strategy Statement (“FSS”).

2. What is an appropriate time horizon over which the employer should reach this target?

The funding time horizon will depend on various employer-specific factors. For example, contractors or charities that are closed to new entrants tend to have short time horizons, typically less than five years. Secure, long term employers, such as councils, that are open to new entrants have much longer time horizons of up to 19 years.

3. How sure do you want to be that each employer will reach the target?

The Fund needs to rely on both contributions and investment returns to pay members’ benefits in the future. The more the Fund relies on investment returns, the less employers will pay in contributions, and vice versa. Given that future asset returns are unknown, there is an element of uncertainty when setting funding plans. Understanding the level of uncertainty is useful from a risk management point of view but it also allows the Fund to reflect the financial strength (“covenant”) of its employers. Asset liability modelling (ALM) was used at the 2019 valuation to quantify the likelihood of an employer meeting its funding target over its time horizon given a proposed contribution rate and investment strategy. For example, if an employer met its funding target in 4,000 out of 5,000 possible future scenarios modelled in the ALM, there would be an 80% likelihood of the funding strategy being successful. Employers with strong financial covenants have lower likelihoods than those for less secure employers.

Full details of the funding strategies that apply to the Fund’s employers are contained in the Funding Strategy Statement. This was reviewed and updated as part of the 2019 valuation.

As each employer has different circumstances, time horizon and covenant, the funding impact and risks resulting from the COVID-19 pandemic should be considered at both a Fund and employer level.

Impact analysis

a) Market movements

As at 31 March 2019 the Fund held assets of £856m against liabilities of £1,104m, corresponding to a funding level of 78%. The green line in the following chart shows how the funding level is estimated to have evolved since 31 March 2019 to a recent date (31 August 2020) by allowing for market movements over the period. Volatility in the funding level measure is to be expected given that the Fund is invested in assets whose day-to-day value can fluctuate significantly e.g. equities. However, it is insightful to understand how the current observed level of funding level volatility compares against the expectation at the last formal valuation. The blue shading in the below chart's background represents the 'corridor of potential funding levels' predicted by the ALM at the 2019 valuation, with the darker shading representing the less likely (i.e. more extreme) outcomes. Further detail on interpretation of the chart is provided underneath.



The key on the right hand side provides the likelihood of a funding level being below that level. For example, a funding level below c64% is expected in 5% (or 1 in 20) of all future outcomes. A funding level above c94% is similarly only expected in 5% of cases. The lightest shaded area represents funding levels between c69% and c87%, and indicates these are expected between the 16th and 84th percentiles, i.e. two thirds of the time.

The chart shows that as at the time of writing, the funding level remains comfortably within the 'corridor' of outcomes predicted by the ALM at the 2019 valuation. For the majority of the period of COVID-19 volatility the funding level remained within the two-thirds band of outcomes (with a few weeks when the level fell to a 1 in 20 outcome at worst). This can be seen by following the green line on the chart above over time. Some further notes on the funding progress are below:

- The funding level became increasingly volatile from February 2020 onwards as COVID-19 started to affect global markets. In particular, the FTSE100 suffered its second largest one day crash in its history, and the biggest since the 1987 market crash.
- Whilst there was a sharp fall in the funding level in March, there has been some 'bounce-back' in recent months. It is yet unknown if this will be sustained due to the continuing uncertainty in the global economy. The timing and shape of any rebound is uncertain and depends on containment of the virus and the effectiveness of policy responses in preventing temporary disruption to businesses and consumers from causing permanent damage.

b) Employer covenant and risks

Many businesses and institutions in all sectors have been affected significantly by COVID-19. The impact will vary by sector and by source of funding. The key challenges include:

- Payment of salaries – should staff be furloughed? Do redundancies have to be made and how are associated costs covered?
- Ensuring cash flow in the business is sufficient to cover costs as trading revenue dries up
- Weakened reserves and reduced financial strength (“covenant”), including the threat of insolvency
- Speed and ability to recover once lockdown measures are lifted
- Affordability of pension contributions resulting in requests for the Fund to reduce or suspend payment

The main funding risks posed to the Fund by its participating employers are:

- Inability to make contributions when the fall due; and/or
- Insolvency resulting in an employer ceasing in the Fund whilst a deficit exists, and that deficit therefore passing to remaining employers to Fund.

Below we consider the impact on covenant for each of the Fund’s main employer groups. Note that within these groups there will be variation between employers. The comments in this paper are general in nature and do not reflect on any one specific employer.

Long term secure, tax-backed employers

The majority of the Fund’s employers are public sector bodies, such as councils and academies, where the covenant is strong and backed by statute or the Department for Education guarantee. These types of bodies are unlikely to pose an insolvency risk to the Fund. Similarly, they are likely to be able to make contributions when they fall due, albeit some who may face cashflow challenges whilst balancing reduced income and increased outgo due to funding pandemic-related activity. This may be more of an issue as the timeframe of the pandemic extends.

Other employers

The most significant impact on covenant is in respect of other employers including those who are close to exit, are not publicly-funded and/or had a weak covenant at the 2019 valuation. The specific employer funding issues that should be considered include the following:

- Contractors – these employers tend to only participate in the Fund for a few years. Recent market movements may have opened up large deficits in their funding positions requiring a cessation payment at the point of exit. This may be counter to the position as at the 2019 formal valuation where such employers may have been in surplus and expecting an exit credit to be paid on cessation. Trading ability and covenant may also be an issue in stressed market conditions depending on the function they carry out.
- Charities and other third sector employers – these bodies are usually closed to new entrants, may already have had weak covenants prior to COVID-19 and may have seen income streams reduce. This group is likely to be one of the most significantly impacted and some will have little financial reserves to call upon to tide them through.
- Leisure centres - their ‘trading revenue’ will be badly hit by lockdown measures although ceding council support may be available

c) Higher death rates

The tragedy of increased death rates due to COVID-19 that is currently unfolding in the UK and globally will inevitably affect all pension schemes. The key impacts of higher mortality from a funding perspective are:

- Liquidity risk – ensuring the Fund has sufficient cash to pay out lump sum death benefits promptly to beneficiaries
- Death-in-service ‘strains’ – the death benefits for an active member may be significantly bigger than the valuation liability. Whilst such strains tend to be ‘absorbed’ easily by large employers, a strain for a small employer with very few actives could materially reduce its funding level. In normal circumstances, these would be very rare events, however they may increase in occurrence due to the level of excess deaths linked to COVID-19.
- Reduced liabilities – higher deaths than expected amongst pensioners will lead to lower liabilities. Mature employers, with higher proportions of pensioner members, may be most ‘affected’.

The evidence of deaths related to COVID-19 is emerging, but it is difficult at this stage to attach any certainty to mortality rates (not least because testing has not been widespread in the UK). However, as the majority of deaths are occurring at older ages, it is reasonable to assume that the overall impact will be a reduction in liabilities and a general improvement to funding levels, all else being equal. The impact is unlikely to offset market movements to any material extent e.g. an infection rate of 33% across the pensioner population might reduce liabilities by around 1% for a typical employer.

At this stage, it is not possible to extrapolate the longer-term impact of a higher death rate in 2020/21 either on future mortality or morbidity rates. There are a number of factors to consider. The responses to COVID-19 including social distancing, increased hygiene measures and the resulting improved air quality and lifestyle changes may act to improve life expectancy. Additionally, the virus may have sadly hastened the deaths of some of the population which would have died anyway of other causes resulting in a lower death rate over the next few years. This may be offset or outweighed if the virus persists over time, like influenza or if there is a long-term impact on the health of those who recover from COVID-19 (which could result in future higher ill health retirement rates. Data is still being collected and analysed and we will monitor any future impacts on life expectancy at subsequent valuations or sooner if necessary.

Risk mitigation measures

There are a number of measures that the Fund may take to mitigate the funding risks outlined above.

a) Market movements

The 2019 valuation was positive with all LGPS funds reporting an improvement in funding over the preceding three years, driven by asset outperformance. Whilst a reduction in funding level is clearly not welcome, it must be remembered that the LGPS is an open scheme with a strong covenant and is able to take a long-term outlook when considering the high-level funding implications of external shocks. This has been the case during past events, such as the “Credit Crunch” or the “Dot Com bubble”, and in both cases the Fund did not make knee-jerk reactions to contribution rates for long-term employers.

No one knows what the long-term impact of COVID-19 may be on the economy and ultimately on the long-term cost of funding defined benefit pensions. We suggest that the Fund

- continues to monitor the funding level and outlook for the long-term economy and returns on the Fund’s assets on a regular basis; but
- does not revisit contribution rates for long-term employers at this stage.

The asset allocation of different LGPS funds will result in a variety of returns over the period since the 31 March 2019 valuation date. LGPS funds each have their own investment strategy, beliefs and attitude to risk. As ultimately the two levers of funding are contributions and investment returns, the Fund should consider if it remains happy with the relative dependence on each for employers and the Fund as a whole as more information about the long-term economic impact comes to light. Whilst these are not immediate risk mitigation measures, the Fund may also wish to consider, when appropriate, how investment strategy may be used to mitigate the funding risks for exiting employers.

b) Employer covenant and risks

Taking the various employer types in turn:

All employers

- The Fund may wish to agree a policy for consistent handling of any requests to defer, reduce or suspend contributions to ensure that each is treated equitably and transparently.

Contractors

- Communicate ongoing uncertainty to employers by reviewing funding positions for those due to cease before 31 March 2023 and discuss whether adjustments are needed to contribution rates prior to exit.
- Consider communication with guarantors/letting authorities in relation to the above pension funding risks. (It is likely the letting authority is actively managing all aspects of contracts in the current climate).
- Check that paperwork on any security e.g. bond or indemnity, is in place and up-to-date

Charities and other third sector employers

- Seek to understand impact on covenant through sector analysis or direct engagement with employers
- Review funding positions for those that might cease before 31 March 2023 and discuss whether adjustments are needed to contribution rates.
- Consider if it is appropriate to commence discussions in relation to post-cessation funding on a case by case basis if cessation by the planned exit date is likely to risk insolvency and a default on the cessation payment due (either in part or in full).
- Check that paperwork on any security e.g. bond or indemnity, is in place and up-to-date.

Leisure centres

- Monitor sector's financial position over coming weeks and months and review covenant if deemed necessary through direct engagement with employer(s).

c) Higher death rates

- Liquidity – the Fund may already have some idea of the likely increase in death benefits from the first few months of the pandemic. Sensitivity around increased death benefit payments can be provided to feed into this.
- Death-in-service 'strains' - identify and communicate risk to small employers with few actives. The Fund may wish to consider a period of risk sharing / self-insurance of this risk given the extreme nature of the event. This could be carried out as a one-off exercise or via an adjustment at the 2022 formal valuation of the Fund.
- Reduced liabilities – the Fund already manages its longevity risk via Club Vita. This involves the regular collection of mortality data from the Fund and many other LGPS and private sector schemes, allowing accurate longevity assumptions to be set at actuarial valuations and emerging trends and experience to be quantified for future discussion.

2. The McCloud judgement

The cause: transitional protections

One feature of the reform of all public sector pension schemes in the first half of the 2010s was the commitment to protect older members. For the LGPS, this protection was transitional and took the form of an underpin. From 1 April 2014, an eligible member would receive the better of benefits earned under the old 2008 scheme (60ths accrual, final salary, retirement age of 65) or the new 2014 scheme (49ths accrual, Career Average Revalued Earnings (CARE), retirement age equal to State Pension Age).

The format of the protections differed between public sector pension schemes, however they were all uniform in applying the eligibility criteria – the protections would only be applicable to members who were:

- active in the scheme as at 31 March 2012;
- within 10 years of their Normal Retirement Age (as defined under the pre-reform scheme rules, 65 in the LGPS) as at 1 April 2012.

Who benefits from the underpin?

A summary of the benefit changes introduced in 2014 are shown below:

	Final Salary scheme	CARE scheme	Impact on value of member's benefits
Accrual rate	1/60th	1/49th	Increase of 22%
Revaluation rate	Salary increases	Consumer Price Index	Depends on an individual's salary growth vs CPI inflation
Retirement age	65	State Pension Age (SPA)	Decrease for members whose SPA is after 65

Due to the significant increase in accrual rate, the underpin only kicks in if salary increases throughout their working life outweigh the additional 22% of CARE benefit (revalued in line with CPI) that had been earned each year. The difference in retirement age could also make a difference, particularly for marginal cases.

The challenge

In 2016/17, members of the Judicial Pension Scheme (including one member named McCloud) brought a claim of age discrimination against the Ministry of Justice (MOJ) due to the imposition of the transitional protections. The members contested that, by applying the protections only to those members within 10 years of retirement at March 2012, younger members of the scheme were at a disadvantage.

The Ministry of Justice conceded that the protections did put younger members at a disadvantage, however they argued that this treatment was justified. The justification being that the members in scope of the protections would likely already have made advanced plans for financing their retirement and any change to their pension scheme may adversely affect these plans.

A separate but similar challenge was also launched by a member of the Firefighters' Pension Scheme.

The Employment Tribunal found against the MOJ and the members' complaints were upheld.

This original decision was appealed by the Government until it reached the Court of Appeal for consideration in November 2018. On 20 December 2018, the Court of Appeal ruled that:

- the Government's appeal was to be dismissed; and
- the claim of discrimination of the grounds of age is valid.

Following on from this ruling, in the first half of 2019 the Government sought leave to appeal this ruling at the Supreme Court. However, in June 2019, the Supreme Court refused the Government's application to appeal, meaning that the Court of Appeal's decision was final.

Following the Court of Appeal's decision at the end of 2018, in January 2019 the decision was taken by the Government to suspend the ongoing Cost Management valuations¹. Further detail about the Cost Management valuation, its interaction with McCloud and impact on funding is contained later in this note (section 3).

After the Supreme Court confirmed they would not hear the Government's appeal, in July 2019, the Government accepted² that the protections put in place were discriminatory and committed to remedying the situation. The court cases to date were only in respect of the Judicial and Firefighters' Pension Schemes. However, the Government also accepted that the ruling would, if tested, also apply to all other public sector pension schemes which implemented age-based transitional protections during the reform process. This includes the LGPS.

Since then, discussions have been taken place to assess how best to resolve the discriminatory elements of the benefit structure (what has now become commonly referred to as "finding a solution" to "McCloud" or "the McCloud judgement"). It is not a viable option to entirely remove the transitional protections as that would involve reducing the accrued rights of some members (i.e. those eligible for the original protections and who would have benefitted, via higher benefits, from the existence of the protections). Therefore, the discussions have been focussed on how to adequately "level up".

Remedy

On 16th July 2020 MHCLG published consultation documents³ setting out detailed proposals for addressing the discrimination. The consultation process closes on 8 October. Hymans Robertson have published our response to the consultation which can be found at the link below⁴.

In summary, the proposed remedy extends the 'transitional protections' underpin (that was promised to active members in 2012 who were within 10 years of normal retirement age) to all other active members, regardless of age. The underpin gives the member the better of CARE or final salary benefits for the eligible period of service.

In general terms, the key features of the underpin are:

- Eligibility is restricted to members who were active in the LGPS on 31 March 2012 and have accrued benefits since 1 April 2014;
- The underpin period applies between 1 April 2014 and 31 March 2022, but ceases when the member leaves active membership or dies in service;
- The final salary for comparison purposes applies at the point that the member leaves active status or reaches age 65 if sooner; and

¹ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2019-01-30/HCWS1286/>

² <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2019-07-15/HCWS1725/>

³ <https://www.gov.uk/government/consultations/local-government-pension-scheme-amendments-to-the-statutory-underpin>

⁴ https://www.hymans.co.uk/media/uploads/Hymans_Robertson_McCloud_Consultation_Response.pdf

- The normal pension age for CARE benefits can be after the normal pension age for final salary benefits. The underpin requires the impact of any applied actuarial reductions to be considered in assessing which benefit is higher.

The changes will be retrospective and will apply to anyone who has left, retired or died and who didn't meet the old underpin criteria but meets the new one. In some cases, this will mean retrospectively recalculating benefits for pensioners, and paying arrears and interest.

There is significant complexity in the detail of how the underpin will apply and the consultation addresses the topics of early leavers, deaths in service, early and late retirements, ill health retirements, members with multiple posts, breaks in service and aggregations of service across different LGPS employments, transfers between public sector schemes, annual allowance implications and the requirement to include information on the underpin on members' annual benefit statements.

Impact on funding and employer costs

At whole fund level, we don't expect the McCloud remedy to have a significant impact on the funding position and hence on employer costs. For the Brent Fund, assuming pay growth assumption of CPI + 0.3%, we estimate that the McCloud underpin may add around 0.1% to the liabilities.

Previous estimates of the impact of McCloud were typically higher than this as they assumed that all members of the Fund would be eligible. Estimates from the Government Actuary were also higher because they tended to assume a higher rate of future salary increases

Whilst at whole Fund level the impact is small, it may be material at individual employer level. This is where the LGPS differs from the other public sector schemes - everything is funded at employer level and contributions can and do vary materially across the employers in the Fund.

The variation in McCloud underpin impact arises due to differing membership profiles, and particularly age. Younger members will have a longer period of salary increases compared to older members (especially once promotional increases are considered, which tend to be higher at younger ages). There is therefore a higher likelihood that the underpin 'bites' for younger members. Our modelling suggests that some employers may see their total liabilities increase by as much as 0.5% whilst other employers will see no impact at all. There is also the potential for one-off significant events which may result in an impact greater than noted above, for example, an employer with only one member who is awarded a significant pay increase.

It is worth noting that the introduction of the underpin to all eligible members, and the fact that the link to final salary will be retained up until the member retires, means that another source of volatility and uncertainty is introduced into the funding of LGPS benefits. We may see employers' funding positions and contribution rates changing by larger amounts between valuations because of this factor.

Formal valuation approach

SAB asked funds and actuaries to allow for McCloud costs at the 2019 valuation in England and Wales when setting funding strategies. For this Fund, we increased the required likelihood of achieving full funding for employers (e.g. from 66% to 70% or 70% to 75%) to build in some margin for McCloud costs. The approach taken to allow for the uncertainty caused by McCloud is set out in Section 2.7 of the Funding Strategy Statement.

Administration impact of McCloud

Despite the relatively small liability impact of the McCloud ruling, the administration impact will be significant. In conjunction with key stakeholders, including the Local Pensions Partnership as administrators, the Fund will have to adjust member's records to reflect the new underpin and to correct any benefits which have already come into payment.

This project will take many months, and potentially years of effort depending on the membership affected. Key stages will include:

Understanding McCloud and establishing a project plan

The key outcomes from this stage will be to identify who is going to be working on the project, the key stakeholders and ensuring that they have the right level of knowledge. This stage would be expected to last until after the consultation process concludes and some outstanding policy decisions have been made. The UK Government have indicated that final Regulations may not be available until 2022/23 but have urged Funds to begin work in the interim.

Identifying cases

Cases in scope then need to be identified using the key criteria set out in the consultation. In most funds around 20-30% of members are impacted. We would strongly suggest that work should commence to identify the groups and employers of members impacted within this Fund.

Adjusting records

Member records need to have the correct information to enable an underpin calculation to be completed. This is one of the most challenging areas of the project and will involve significant engagement with employers to gather salary and working hours data back-dated from 1 April 2014. This data has not previously been collected, as it wasn't needed to administer CARE benefits. This will be challenging as some employers will have left the Fund, some may have changed payroll providers and some simply won't have kept the records required. There will be a need for policy decisions on how to approach situations where it isn't possible to complete the data record but the Fund must ensure the members' benefits are calculated accurately and the underpin applied fairly. The data specification for employers will have to be changed in order to ensure the correct data is captured within future processes.

Recalculation of benefits

When the data is sourced for identified cases, the members' benefits will need to be re-calculated. For members still in service, or those who have left the Fund before retirement, their accrued pension may have changed and their annual benefit statement may need to be adjusted. There may be annual allowance tax implications for some members. Some of these calculations will be complex as a result of some of the issues mentioned above. Liaison with system providers is underway to specify changes required to the administration software to support the recalculation processes and ongoing requirements to assess the underpin. Early indications are that it may take around 12 months for administration providers to fully develop the calculation routines required.

Calculate arrears and interest and then pay arrears

Arrears and interest payments may be due for some members whose benefits are already in payment, if the McCloud underpin would have resulted in a different pension for these members. In some cases where benefits are changing there may also be tax charges for members. The tax implications of these proposals are complex as members who would not have breached annual allowance under the CARE scheme may breach annual allowance if they become eligible for an underpin.

Final record adjustment to both the administration and payroll record if applicable

Finally, the member administration and payroll records will need to be updated with the calculated position and this must be maintained going forward.

Audit check and Stakeholders

There is a significant list of stakeholders who will be involved in the project including current and former employees, their dependents, fund employers, your actuary, your administrator, pensions committee and board, MHCLG and Treasury departments, SAB and others. Different stakeholders require different levels of involvement at the different stages of the project but communication across all groups about progress, issues and outcomes and costs will be vital. Given the complexity of the project checking and audit processes will also have to be robust.

Project management

The size and complexity of this project means that it will also require proportionate project management resource and expertise.

McCloud summary

Remedying the discrimination identified by the McCloud judgment will be a significant undertaking for the Fund's administration team. We expect further updates to be provided to Pension Sub-Committee in due course.

3. Cost Management Valuations 2016 and 2020

In addition to McCloud, the “Cost Management Valuations” are an ongoing national process which is resulting in current uncertainty around the benefit structure of the LGPS. These valuations were similarly borne out of the public service pension reform in the early 2010s.

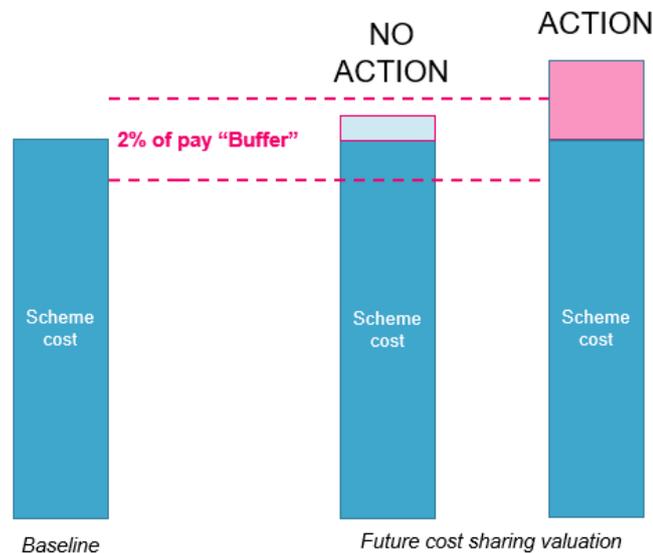
Background

As part of the reforms discussed earlier in this note, a mechanism was put in place which sought to put in a safety valve and protect employers from significant increases in future pension costs and to support the long-term sustainability of a defined benefit pension offering.

Historically, any variations in pension costs fell to the employer to fund as both benefits earned and employee contributions were defined in the Regulations. The cost mechanism sought to re-distribute the risk and share any cost variations with members. Prior to this mechanism being introduced, employer contributions had been on an upwards trend across a number of valuation cycles.

This mechanism works on the basis that every 3 or 4 years (the frequency varies between public sector pension schemes), a valuation at national level will be carried out by the Government Actuary’s Department on behalf of Treasury to assess the overall cost of pension provision. The assessed cost will then be compared against a benchmark cost, and if the difference is equivalent to more than 2% of pay, then action will be taken to amend the benefit structure or employee contribution rates such that the current cost matches the benchmark cost. If the variation is less than 2% of pay then no action is taken.

This valuation is carried out on a set of assumptions set by HMT, and differ from those used for the purposes of your formal valuation to set employer contributions. One of the key features of the Cost Management valuation is that it limits the factors for inclusion to those that have an impact on the benefit received by a member. Critically, it makes no allowance investment returns earned on assets.



The mechanism was originally intended to act as a capping mechanism on costs i.e. action would only be taken if costs were higher than expected. However, during the reform implementation, the mechanism was amended to a symmetrical design i.e. there would be a cap and a floor on cost. Therefore, if costs were less than expected, then action would be taken to improve the benefit structure to restore the cost to its benchmark level. In essence, the Cost “Cap” became Cost “Management”.

Alongside the Treasury Cost Management process (TCM) described above, the LGPS in England and Wales also has a SAB Cost Management process (SCM). The SCM is carried out ahead of the TCM and takes into account different factors from the TCM, including factors which are unique to the LGPS. Importantly, any change in benefits as a result of the outcome of the SCM process is allowed for within the TCM.

The SCM also works slightly differently in how it may implement amendments to benefits if the costs of the scheme have moved.

- A movement of between 0% and 1% from the target in either direction **may** result in agreed recommendations for action to move back to the target.
- A movement of between 1% and 2% from the target in either direction **should** result in agreed recommendations for action to move back to the target.
- A movement of 2% or more from the target in either direction **must** result in agreed recommendations for action to move back to the target.

By contrast, for the TCM mechanism, no corrective action will be required to move the costs back to the target unless there is a movement of 2% or more from the target in either direction. This gives SAB the opportunity to make a small change in the benefit structure during the SCM to avoid a larger change being triggered by the TCM process.

The first Cost Management valuations were carried out as at 31 March 2016 and initial results communicated in Autumn/Winter 2018. Early indications were that the cost of the scheme had fallen as a result of falling improvements in life expectancy and lower than expected pay growth. The SCM process reported a fall of around 1% of pay and the TCM process was expected to report a fall in excess of 2% of pay below target therefore requiring future benefit improvements.

The SCM process proposed benefit improvements of around 1% of pay, mainly involving changes to employee contributions, and it was expected that after these benefit improvements were implemented no further action would be needed by the TCM process as their assessment of the scheme cost would be restored within the 2% of pay buffer.

These changes were due to be come into force under the relevant regulations by 1 April 2019.

Interaction with McCloud

Whilst the Government was dealing with the emerging Cost Cap results, they also learnt of the Court of Appeal's ruling in the McCloud case.

It was the Government's opinion that any increase in benefits due to McCloud should be factored into the ongoing Cost Management valuations. Given that the McCloud remedy will result in an increase in pension costs, it may be of such a magnitude that the cost saving identified at the Cost Management valuations reduces to less than 2% of pay when assessed using their approach. If this were to be the case then no action would be needed to amend benefits from 1 April 2019. (Note that at this stage we are unable to assign a probability to how likely this outcome is).

Therefore, the Government announced in January 2019 that the Cost Management valuation process would be put on hold until McCloud was resolved. After the resolution, the Cost Management valuations would be restarted and, if any changes are required to be made to benefits or contributions, then they would be backdated to 1 April 2019.

Legal challenge

The action by Government to suspend the implementation of scheme changes as a result of the Cost Management valuations has recently been challenged by four Unions (Fire Brigades Union, Public and Commercial Services Union, the Professional Trades Union for Prison, Correctional & Secure Psychiatric Workers and the GMB Union).

In April 2020, these Unions have filed court proceedings against the UK Government arguing that the suspension breaches the Cost Management regulations (which states benefits changes must come into force from 1 April 2019)⁵.

The challenge also effectively asserts the Unions' belief that the costs associated with resolving McCloud sit outside the Cost Management mechanism.

The case is still ongoing, however, on 16th July 2020 the Treasury announced that the Cost Management processes for the LGPS will be re-started assuming that the McCloud costs are included in the calculations.

The future of the Cost Management

The results of the 2016 Cost Management valuation were likely to have been unexpected when agreeing to implement a symmetrical design. The rigid regulations that were put in place gave the Government no option but to implement benefit increases following the publication of the Cost Management valuation results. It is also worth noting that in the absence of agreement on the proposed benefit increases, the default approach is to increase the accrual rate to restore the scheme cost to the benchmark level.

For many public service schemes, an increase to future benefits was announced at the same time as an increase to contributions (which arose due to a change in the HMT valuation assumptions).

In light of the unexpected results, the Government confirmed in September 2018⁶ (when the first initial results started to emerge) that the Cost Management mechanism will be reviewed ahead of the next round of Cost Management valuations (due to take place as at 31 March 2020) to ascertain whether it still meets the policy intent.

However, until such a review has been completed, existing legislation requires that the next round of Cost Management valuations should take place. We understand that data will be requested for the 2020 Cost Management valuation in late 2020.

⁵ <https://www.fbu.org.uk/news/2020/04/25/firefighters-take-government-court-over-pension-%E2%80%98robbery%E2%80%99>

⁶ <https://hansard.parliament.uk/commons/2018-09-06/debates/18090633000015/PublicServicePensionSchemesQuadrennialValuations>

4. Public Sector Exit Payments

The government first announced plans to cap exit payments in the public sector in 2015. On 10 April 2019 HM Treasury (HMT) launched a consultation on draft regulations, guidance and Directions to implement the cap. HMT published its response to the consultation⁷ on 21 July 2020, and MHCLG issued their consultation for local government on 7 September 2020⁸.

Statutory redundancy pay and early retirement strain

The consultation included an unexpected proposal affecting redundancy pay (both statutory and discretionary). This relates to all public sector workers being made redundant with an immediate entitlement to an early retirement pension (i.e. those at or over age 55 but below normal pension age). Under the proposals, affected employees would not be able to take both their full redundancy pay and their full unreduced pension immediately. Instead, they would have to give up all or part of either one, with the decision being up to them. This rule would apply to anyone in these circumstances, regardless of the value of their redundancy pay or pension strain cost relative to £95k.

Exit Payments £95k Cap

The cap will apply to all public sector employers. The exit payment cap is set at a total of £95,000 with no provision for this amount to be index-linked. Exit payments include redundancy payments (including statutory redundancy payments), severance payments, **pension strain costs** – which arise when an LGPS pension is paid unreduced before a member's normal pension age – and other payments made as a consequence of termination of employment. Although statutory redundancy is included as an exit payment it cannot be reduced. If the cap is exceeded, therefore, other elements that make up the exit payment must be reduced to achieve an exit payment of £95,000 or less.

Applying the cap in the LGPS

The major impact of the regulations will be on LGPS members aged 55 or over who currently qualify for an unreduced pension because of redundancy or efficiency retirement as well as a severance payment under The Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006.⁹ We understand that changes to those regulations will prevent the payment of severance in addition to a pension strain cost. Not only will a severance payment no longer be payable but if a pension strain payment cannot be made in full because of the cap, then the member's pension would be reduced.

Pension strain cost

Currently the pension strain cost that an employer pays on the early retirement or redundancy of a member over the age of 55 is calculated at a local fund level using factors provided by your actuary which reflect your local funding assumptions. These factors were most recently reviewed following the 2019 valuation process. These factors are intended to reflect the difference in cost arising to the Fund as result of paying benefits sooner than expected and for a longer period of years. The local approach to calculating the strain could mean that members in different LGPS funds with the same accrued pension may have a different strain cost to take into account in the calculation of the exit payment limit and hence a different reduction. Therefore, MHCLG have asked the Government Actuary's Department (GAD) to produce standardised factors for use in these calculations.

⁷ <https://www.gov.uk/government/consultations/restricting-exit-payments-in-the-public-sector>

⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/916615/Reforming_local_government_exit_pay_consultation.pdf

⁹ <https://www.legislation.gov.uk/uksi/2006/2914/contents/made>

This will result in equity between members in different funds but will lead to less accurate assessments of the strain costs for the employers and could result in employers paying less in strain costs at the time of exit. Any shortfalls will feed into an employer's position at the next triennial valuation and may result in contribution increases at that time.

How much are pension strain costs?

GAD have not yet published the factors to be used in these calculations so we cannot yet assess with certainty the pension strain amounts. However, using current strain factors for a typical Fund, some case studies are shown below, noting that in all four cases the member's LGPS pension would be a similar amount (broadly £15,000 p.a.).

Member	A	B	C	D
Salary	£30,000	£45,000	£90,000	£150,000
Exit Age	55	55	60	64
Service	30 years	20 years	10 years	6 years
Early retirement pension strain	£112,000	£112,000	£58,000	£12,000

Implementation Issues

Although this policy was first announced back in 2015, there is now a very short timeframe for implementation and for the required changes to Regulations to be made. Any member leaving from an employer subject to the cap, after the end of the year, will have to have the employer strain cost calculated using the new standardised strain factors when available and members' pensions reduced as appropriate. As a result, it will be difficult to provide redundancy cost estimates to employers over the next few months.

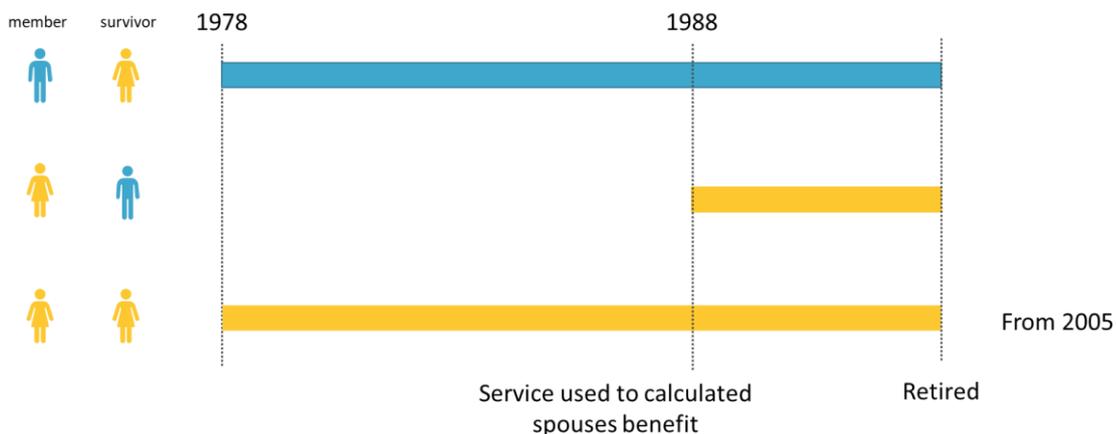
There will now be two different processes for early retirements for employers who must apply the public sector exit cap and for employers who are outside of the public sector exit cap, whose members are still entitled to benefits unreduced regardless of the strain cost.

The regulations to put this into practice are expected to come into force in the near future: this obviously has immediate implications for any employers planning redundancy exercises, as any quotes issued now may no longer be accurate when the time comes to pay them. Although the changes do not affect the Fund directly, it should alert employers to the changes as soon as possible. There will also be non-trivial administrative process implications.

5. Goodwin ruling

The Goodwin tribunal was raised in the Teachers’ scheme. It claimed members, or their survivors, were discriminated against due to their sexual orientation. The claim was because the Teachers’ scheme provides a survivor’s pension which is less favourable for a widower or surviving male partner, than for a widow or surviving female partner of a female scheme member. On 30 June 2020, the Tribunal found in favour of the claimant and agreed there was discrimination.

This finding and remedy is expected to apply across all public service pension schemes, including the LGPS. The diagram below illustrates the inequality.



The first case considers a male member who entered into their partnership/marriage with their spouse or partner after leaving active status. All of this member’s service from 1978 until retirement would count towards the calculation of the survivor’s pension.

The second case considers a female member who entered into their partnership/marriage with their **male** spouse or partner after leaving active status. Even if they had identical service histories to the male member in the first case, the survivor’s pension would only be based on service from 1988 until they retired if they entered into their partnership or marriage after leaving active employment. This was viewed as unfair and female members were given an option to purchase the “missing service” to uplift their dependent’s benefit.

However, in 2005, following on from the Walker case the definition of spouse in the Regulations was expanded to include same sex relationships. In effect, from 2005, if a female had a female spouse or partner and their partnership/marriage was after they left active status, all their service since 1978 counted towards their survivor’s pension and they weren’t required to pay additional contributions to benefit from this uplift. The only remaining discrimination was therefore against female members with male partners. Therefore, the tribunal found discrimination on grounds of sexual orientation.

Remedy

A group of members, namely females who have a male survivor, may have their survivor’s pension uplifted to include any service accrued between 1978 and 1988.

In order to administer this all post-2005 deaths of female members will need to be investigated. In some circumstances, the Fund may not have any data on survivors or their whereabouts which could prove to be a significant challenge. This would be an unwelcome burden alongside McCloud activity.

For employers, the impact is likely to be a small increase in their liabilities. For the Brent Fund these increases are estimated to be:

	Increase in Pensioner liability	Increase in Deferred liability
Overall increase for Fund	0.1%	0.1%
Increase for most-affected employer	6.4%	1.6%
Proportion of employers with an increase greater than 0.1%	18%	37%

Similar to McCloud the impact is largely administrative rather than on pension scheme funding but could be significant at employer level depending on the membership profile.

6. Regulation changes to support management of employer risk

In May 2019, MHCLG launched its consultation “Local Government Pension Scheme: Changes to the Local Valuation Cycle and the Management of Employer Risk”. The consultation sought views in the following areas:

- a) Changes to the LGPS local fund valuation cycle
- b) Increased flexibility for Funds to carry out interim valuations and/or review employer contributions between formal valuations
- c) Proposals for flexibility around employer cessation debts
- d) Proposals for policy changes for payments of employer exit credits
- e) Potential changes to employers required to offer LGPS membership.

The outcome of the exit credit consultation (d) was published in February this year. The Fund now has a policy on repayment of exit credits. There has been no update on changes to the valuation cycle proposals (a) or to the employers who are required to offer LGPS access (e).

The response published in August 2020¹⁰ dealt with items (b) and (c), with Regulation changes coming into force on 23 September 2020, allow the Fund to recalculate employer contributions in the following circumstances:

- There has been a significant change to the liabilities of an employer
- There has been a significant change in the employer’s covenant
- At the request of the employer.

This publication also allows greater flexibility around managing the exit of an employer from the Fund. On exit from the Fund, where the employer is in deficit, the following options are available:

- The Employer pays a full cessation payment carried out in line with regulation 64(4) of the 2013 LGPS Regulations
- The Fund can agree a repayment schedule with an employer to allow them to spread the exit payment over a number of years
- Enter into a Deferred Debt Arrangement (DDA) where an employer can continue in the Fund with no active members but continue to pay secondary contributions as determined at formal valuations. An employer entering into this arrangement would be known as a “deferred employer”.

Whilst many Funds have entered into these arrangements, these are now supported by the regulations.

The Fund’s officers will be working with the Fund’s actuaries to consider the Brent Fund policy on these new freedoms and will report back to Pension Sub-Committee in due course.

¹⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/911792/Government_response_Exit_payments_and_review_employer_contributions.pdf

Summary and Next Steps

This paper highlights several important regulatory changes that will directly impact both members and employers over the coming months. Together, they represent a significant challenge to Fund administration processes and bandwidth, especially given the challenges of the current working environment. The Fund will have to consider how to manage this change program including:

- Project planning and management;
- Stakeholder communications;
- Resource requirement;
- Risk management; and
- Appropriate audit and oversight.

We would be pleased to provide further information or support on any of the topics mentioned above.

Reliances, limitations and professional notes

This paper should not be released or disclosed to any third party without our prior consent. Hymans Robertson LLP accepts no liability to any other party unless we have expressly accepted such liability.

This report complies proportionately with the relevant Technical Actuarial Standards set out below:

- TAS 100 (Principles of Technical Actuarial Work); and
- TAS 300 (Pensions).

Prepared by:-



Douglas Green FFA

Fund Actuary

For and on behalf of Hymans Robertson LLP

17 September 2020

LGPC Bulletin 200 – July 2020

Local Government Pensions Committee (LGPC)
Secretary, Lorraine Bennett

Foreword

This bulletin contains important updates for administering authorities, Scheme employers and software suppliers. It also provides a general update for all LGPS stakeholders.

This bulletin contains important articles on:

- [McCloud data collection](#)
- [MHCLG consultation on changes to the statutory underpin](#)
- [Changes to male survivor benefits \(LGPS Scotland\)](#)
- [Unfunded public service pension schemes consultation](#)
- [HMT response to consultation on restricting exit payments](#)
- [Written Ministerial Statement on survivor benefits](#)
- [Updates to administrator websites and launch of employer bite-size training](#)

which need action by certain stakeholders.

If you have any comments or articles for future bulletins, please contact query.lgps@local.gov.uk.

Index

COVID-19	3
Welsh life assurance scheme	3
COVID-19 follow up survey	3
LGPS England & Wales Scheme Advisory Board (SAB)	4
SAB statement on local pension board meeting cancellations	4
Public sector exit payments cap summary updated	4
McCloud data collection survey	4

McCloud data collection	4
SAB summary of MHCLG McCloud remedy consultation	6
Corporate Insolvency and Governance Act 2020.....	6
Pension Schemes Bill – Clause 123	6
LGPS England & Wales.....	7
MHCLG consultation on amendments to the statutory underpin.....	7
Actuarial valuation of the LGPS 2016 published.....	7
LGPS Scotland	8
Male survivor benefits and opposite sex marriage	8
SPPA consultation on changes to underpin regulations.....	8
HMRC.....	8
Managing pension schemes service newsletter	8
GMP equalisation newsletter	9
HMT.....	9
Unfunded public service pension schemes consultation	9
Employer cost cap process	10
HMT responds to consultation on restricting exit payments	10
Written Ministerial statement on survivor benefits.....	11
Call for evidence on Pensions tax relief administration	12
DWP.....	12
DWP updates guidance on pensions after Brexit.....	12
TPO.....	12
TPO publishes corporate plan 2020/23.....	12
TPR.....	12
TPR publishes corporate plan for 2020/21	12
TPR publishes Annual Report and Accounts 2019/20	12
Other news and updates	13
Development of the NI Database	13
Updates to administrator websites and employer bite-size training	13
New version of Payroll guide published	14

Calculation of assumed pensionable pay	14
Call for input on pensions dashboards data standards published	15
National LGPS Frameworks July news Bulletin	16
The Finance Act 2020	16
Training	16
Wider landscape	17
Money and Pension Service (MaPS) launches Money Navigator tool	17
FCA launches enhanced Financial Services Register.....	17
Legislation.....	17
Acts.....	17
Statutory Instruments.....	17
Useful links	17
LGPS pensions section contact details.....	18
Further information.....	19
Copyright.....	19
Disclaimer	19

COVID-19

Welsh life assurance scheme

Further information is now available on the [NHS and Social Care Coronavirus Life Assurance Scheme 2020 Wales](#). The scheme will cover front-line health and social care workers who provide treatment, care and other related services directly to those suffering from the disease. The Welsh Government will pay a lump sum of £60,000 in respect of the death of NHS and social care staff if Welsh Ministers conclude the person's death was caused by the virus. The lump sum will be paid in addition to any pension scheme death benefit that also becomes payable.

COVID-19 follow up survey

On 13 July 2020, Rachel Abbey emailed all administering authorities to let them know that we had issued a COVID-19 follow up survey. The aim of the survey is to find out how the position for administering authorities has changed since the beginning of the pandemic. The survey has now closed, and we will make a summary of the results available shortly.

LGPS England & Wales Scheme Advisory Board (SAB)

SAB statement on local pension board meeting cancellations

It has come to the attention of the SAB that some administering authorities have cancelled meetings of their local pension boards during the COVID-19 emergency. Having taken legal advice, the SAB is satisfied that:

- arranging a virtual meeting of a local pension board would facilitate the discharge of a local pension board's duty to conduct business during the emergency, and
- a local pension board therefore has the power to hold virtual meetings by virtue of regulation 106(8) of the LGPS Regulations 2013.

A local pension board's terms of reference may already allow virtual meetings. If they do not, the SAB recommends amending them to allow virtual meetings in emergency situations.

You can read the full [SAB statement on virtual local pension board meetings](#) on the SAB website www.lgpsboard.org.

Public sector exit payments cap summary updated

The [Public sector exit payments cap summary](#) on the board website has been updated to take into account the HMT consultation response. You can read more about the consultation response in the [HMT responds to consultation on restricting exit payments](#) article later in this bulletin.

McCloud data collection survey

On 8 July 2020, Lorraine Bennett emailed all administering authorities in England, Wales and Scotland to ask them to complete a short survey about the working hours and service break data they have collected since 1 April 2014 (2015 in Scotland). Thank you to all administering authorities who completed the survey, which is now closed.

McCloud data collection

Administering authorities that have not collected working hours and details of service breaks for all members since 1 April 2014 (2015 in Scotland and Northern Ireland) will need to collect historical data to implement the McCloud remedy for members in scope of protection.

The McCloud implementation group has produced a collection of documents to assist administering authorities with the process of collecting the historical data they will need to calculate the statutory underpin. These new documents:

- guidance for administrators
- standard data collection template
- notes to accompany the standard data collection template
- key messages for employers
- Q&As for employers

can be found on the:

- [Administrator guides and documents](#) page of www.lgpsregs.org and
- [Administrator guides and documents](#) page of www.scotlgpsregs.org.

Administering authorities will also have to collect hours and service break data on an ongoing basis until the end of the remedy period.

We obtained legal advice from Squire Patton Boggs about the lawful basis that administering authorities could rely on when collecting and storing remedy data from employers. You can read the [legal advice on McCloud and the collection of personal data](#) on the [Legal opinions page](#).

The SAB recommends that the standard data collection template and notes are used by all administering authorities that need to collect historic data.

Scottish administering authorities and NILGOSC will need to adjust the documents as the current versions refer to the MHCLG consultation that applies to the LGPS in England and Wales only.

Active members over 2008 Scheme NPA

It is proposed in the consultation that provisional information about the underpin should be included in annual benefit statements. This means that an underpin comparison must be performed for qualifying members who remain active beyond their 2008 Scheme normal pension age (NPA) when they reach that age.

Administering authorities may wish to review their processes for members in this category. Any administering authorities who do not have the data they need to perform underpin comparisons for members who are over their 2008 Scheme NPA may wish to use the data collection exercise to collect the missing data.

You can read more about the MHCLG consultation in the next article, and in the [MHCLG consultation on amendments to the statutory underpin](#) article later in this bulletin. We understand that SPPA and the Department for Communities will shortly be issuing similar consultations for the LGPS in Scotland and Northern Ireland respectively.

Action for administering authorities

Please review the data collection template and supporting documents. These should form the basis of the exercise to collect historical service data from employers. You may wish to discuss the options for uploading data with your pension software provider.

SAB summary of MHCLG McCloud remedy consultation

On 16 July 2020, MHCLG published a [consultation on amendments to the statutory underpin](#). The amendments are designed to remove age discrimination from the LGPS. You can read a summary of the consultation proposals on the [McCloud page](#) of www.lgpsboard.org.

Following the publication of the MHCLG consultation, the SAB has updated the [McCloud Q&As for administering authorities](#). You can read more about the consultation in the [MHCLG consultation on amendments to the statutory underpin](#) article later in this bulletin.

Corporate Insolvency and Governance Act 2020

We let you know in Bulletin 199 that the [Corporate Insolvency and Governance Act 2020](#) came into force on 25 June 2020. The Government has published [Guidance on the Corporate Insolvency and Governance Act 2020](#). The Act includes provisions for a moratorium during which companies can defer debts. The SAB is seeking legal advice on the potential impact this may have on employer deficit contributions.

Pension Schemes Bill – Clause 123

The SAB Chair has written to the Local Government minister expressing support for the principles behind an amendment to clause 123 of the [Pension Schemes Bill](#) that was passed in the Lords. You can read more about the amendment and its potential implications for Scheme funding in the article dated 17 July 2020 on the [SAB website homepage](#).

LGPS England & Wales

MHCLG consultation on amendments to the statutory underpin

On 17 July 2020, Lorraine Bennett emailed all administering authorities to let them know that MHCLG has published a [consultation on amendments to the statutory underpin](#). The consultation seeks views on proposed changes to the LGPS in England and Wales to remove the unlawful age discrimination identified in the McCloud judgment.

In summary, the consultation proposes that:

- members who were active in the 2008 Scheme on 31 March 2012 who joined the 2014 Scheme and do not have a disqualifying break will be covered by underpin protection
- members do not need to have an immediate entitlement to benefits when they leave the Scheme to qualify for underpin protection
- underpin protection will take account of early and late payment actuarial adjustments
- information about the impact of the underpin must be included in annual benefit statements.

Other proposals clarify how the underpin affects the calculation of survivor benefits, transfer values and trivial commutation payments.

The 12-week consultation will close on 8 October 2020. The LGA will be submitting a response which we will share in advance of the closing date.

We have updated the [McCloud FAQs for members](#) to let members know that the consultation has been launched and to provide a link.

Action for administering authorities

Please publicise the consultation to your Scheme employers.

Actuarial valuation of the LGPS 2016 published

The Government Actuary's Department (GAD) is undertaking an [actuarial valuation of the LGPS as at 31 March 2016](#) as part of the cost control process. This work was on hold because of the changes to the scheme in response to the McCloud judgment. On 15 July 2020, the Government published a GAD report on the membership data that will be used to calculate the valuation results.

LGPS Scotland

Male survivor benefits and opposite sex marriage

On 27 July 2020, the Scottish Public Pensions Agency (SPPA) published [circular 2020/04](#). We have added the circular to the [SPPA circulars and guidance](#) page of www.scotlgpsregs.org.

The purpose of the circular is to publicise a recent legal case that will affect LGPS benefits payable to male survivors of opposite-sex marriages.

We have sought further clarifications about the impact of the circular from SPPA.

SPPA consultation on changes to underpin regulations

On 31 July 2020, SPPA published [Circular 2020/05](#). The purpose of the circular is to inform scheme members and employers of the upcoming SPPA consultation on proposals to address the age discrimination introduced as a results of scheme reforms in 2015. The circular also confirms that the cost cap element of scheme valuations will now resume.

You can read this and past circulars on the [SPPA circulars and guidance](#) page of www.scotlgpsregs.org.

HMRC

Managing pension schemes service newsletter

On 21 July 2020, HMRC published a [Managing pension schemes service newsletter](#). The newsletter provides updates for pension administrators on the Managing pension schemes service:

- submitting an AFT return and starting a new return for the July to September quarter
- the process to follow when making a payment for returns submitted using the service and how to request a refund or reallocation
- timeline for Phase 2 of the development of the service
- if an administrator has multiple scheme administrator IDs, how to move these to a single ID on the Pension schemes online service before migrating to the Managing pension schemes service
- a similar change for practitioners with multiple scheme practitioner IDs
- credentials for users who have not signed into a service for over three years will be deleted

- HMRC has provided guides for users of their online services. They have recently published [Submit an Accounting for Tax return using the Managing pension schemes service](#) and updated [Pension schemes online: user guide](#).

GMP equalisation newsletter

On 16 July 2020, HMRC published a [newsletter on Guaranteed Minimum Pension \(GMP\) equalisation](#). The newsletter supplements information in the Pensions Tax Manual and covers the possible impact of GMP equalisation on past and future lump sum payments.

HMT are currently working with MHCLG and GAD to assess if GMP equalisation applies to LGPS members.

HMT

Unfunded public service pension schemes consultation

On 16 July 2020, HM Treasury (HMT) published a [Public service pension schemes consultation](#) setting out proposals to remove the unlawful discrimination identified in the McCloud judgment from the unfunded public service pension schemes.

The consultation does not cover the LGPS in England & Wales, Scotland or Northern Ireland. It covers the NHS in England & Wales and Scotland, Teachers in England & Wales and Scotland, Firefighters in England, Wales and Scotland, Police in England & Wales and Scotland, Civil service in Great Britain, UK armed forces and the Civil Service (others).

In summary, the consultation proposes that:

- protection will be extended to scheme members on or before 31 March 2012 who have membership in the reformed schemes and do not have a disqualifying break
- protected members will have the right to choose to be a member of the final salary scheme for the remedy period from 1 April 2015 to 31 March 2022 (or their date of leaving the scheme, if earlier)
- views are sought as to when this choice is made, either within a limited period after 1 April 2022 or at the point benefits are paid.

You can read more about the contents of the consultation on the [McCloud page](#) of the SAB website. The LGA will submit a response to the consultation on behalf of the Firefighters' Pension Scheme, the Teachers' Pension Scheme and the Police Pension Scheme.

Employer cost cap process

Alongside the Public service pension schemes consultation, the Government made an announcement on the cost control mechanism that applies to **all public service pension schemes**. The announcement confirms that:

- the cost control mechanism pause will be lifted, and the cost control element of the 2016* valuations process will be completed
- the cost of addressing the discrimination identified in the McCloud judgment will be included in this process.

* we assume that the LGPS in Scotland will be included, even though the effective date of the valuation is 2017 under the Public Service Pensions (Valuations and Employer Cost Cap) Directions 2014.

The SAB (England and Wales) will consider its position on the SAB employer cost cap process in the coming weeks.

GAD issued a [Technical bulletin on public service pensions](#) on 16 July 2020 which summarises:

- the introduction of transitional protections when public service pension schemes were reformed in 2015
- proposals to remove the age discrimination
- the differences between immediate choice and deferred choice
- technical issues that need to be considered when implementing the remedy
- tax implications that may result from members changing scheme
- lifting the pause in the cost control mechanism.

HMT responds to consultation on restricting exit payments

On 21 July 2020, HMT published the [Government response to the consultation on restricting exit payments in the public sector](#). This was followed by the publication of draft [regulations for capping public sector exit payments](#) on 22 July. The draft regulations include a list of employers who will be covered by the cap.

You can read the Government response to the consultation, as well as the original consultation documents issued in April 2019 and the LGA response in the 2019 section of:

- the [Non-scheme consultations](#) page of www.lgpsregs.org and
- the [Non-scheme consultations](#) page of www.scotlgpsregs.org.

The Regulations will need to be approved by both houses of parliament and will come into force 21 days after that process is complete. We are expecting revised HMT Directions and guidance on the implementation of the cap and the waiver process.

We understand that the Regulations will affect LGPS members in England and Wales who currently qualify for an unreduced pension because of redundancy or efficiency retirement. If the cap is breached, then the member may have to take a reduced pension. MHCLG is looking at options to introduce choice to allow members in this position to opt for a deferred pension instead. We also expect the introduction of a standard strain cost calculation so that the cap will apply equally to members across the country.

You can read more information about the policy on the [Public sector exit payments cap](#) page of www.lgpsboard.org.

Action for administering authorities

Please let your Scheme employers know about the Government response to the consultation and the publication of the draft regulations. Employers can check the Schedule to the draft regulations to find out if the exit payment cap will apply to them.

Written Ministerial statement on survivor benefits

On 20 July 2020, the Chief Secretary to the Treasury made a [written statement on survivor benefits and public service pensions](#). The statement was in response to a Teachers' Pension Scheme Employment tribunal case concerning the lower survivor benefits paid to a male survivor of a female scheme member compared to the survivor benefits paid to a same sex survivor.

“The Government has concluded that changes are required to the Teachers’ Pension Scheme to address the discrimination. The Government believes that this difference in treatment will also need to be remedied in those other public service pension schemes, where the husband or male civil partner of a female scheme member is in similar circumstances.

Departments responsible for the administration of affected scheme will consult on and take forward changes as soon as possible.”

SPPA have issued a circular covering [male survivor benefits and opposite sex marriage](#) and the changes that will be introduced to the LGPS in Scotland in response to this statement. We await guidance from MHCLG on what action administering authorities in England and Wales should take.

Call for evidence on Pensions tax relief administration

On 21 July 2020, HMT published [Pensions tax relief administration: call for evidence](#). The Government is seeking views on how different methods of tax relief operated by pension schemes affects the take-home pay of low-earning individuals.

DWP

DWP updates guidance on pensions after Brexit

The Department for Work and Pensions (DWP) has updated the [guidance explaining the rights of UK nationals in the European Economic Area or Switzerland](#) to benefits and pensions from 1 February 2020.

TPO

TPO publishes corporate plan 2020/23

On 14 July 2020, the Pensions Ombudsman (TPO) published its [corporate plan 2020/23](#). The plan outlines TPO's strategic aims for the next three years and provides updated key performance indicators for 2020/21.

TPO's focus remains on improving the customer experience by resolving disputes at an early stage and making the process quicker and easier for all parties.

TPR

TPR publishes corporate plan for 2020/21

On 29 June 2020 the Pensions Regulator (TPR) published its [Corporate Plan 2020/21](#), setting out its priorities for the coming year. Publication had been delayed as TPR revised its plans to respond to the challenges presented by the COVID-19 pandemic.

TPR publishes Annual Report and Accounts 2019/20

On 16 July 2020, TPR published its [Annual Report and Accounts for 2019/20](#).

Other news and updates

Development of the NI Database

On 10 July 2020, Lorraine Bennett emailed all administering authorities to let them know that we have added a new facility to the LGPS National Insurance (NI) Database. We have added a bulk search facility so that users can now search for multiple National Insurance numbers in addition to carrying out individual searches. We have updated the user guide to cover how to use the bulk search facility. You can access the user guide on the [NI database website](#).

We would like to thank our colleagues at South Yorkshire, Wiltshire and the West Midlands for testing this new facility. If you have any feedback on the bulk search facility, please let us know by emailing query.lgps@local.gov.uk.

Updates to administrator websites and employer bite-size training

We have made updates to the LGPS administrator websites. The purpose of the changes is to make it easier for Scheme employers to access information and resources that are relevant to them.

Changes to www.scotlgpsregs.org

- The Old Timeline link has been removed from the main menu. You can find the Old Timeline by selecting Scheme Regulations from the menu.
- We have introduced an Employer resources section. This section currently contains guides and documents relevant to LGPS employers in Scotland and further resources will be added as we develop them.
- The Guides and sample documents page has been renamed Administrator guides and documents.

Changes to www.lgpsregs.org

- The Old Timeline link has been removed from the main menu. You can find the Old Timeline by selecting Scheme Regulations from the menu.
- The Guides and sample documents page has been renamed Administrator guides and documents.
- We have introduced an Employer resources section. This section contains:
 - guides and documents relevant to LGPS employers in England and Wales

- employer bite-size training – we have launched six modules on assumed pensionable pay. We will upload text only versions of these courses to the website in the coming days. We are producing further employer training modules which we will add to this page when they are completed
- information about other training and resources for employers.

Action for administering authorities

Please let your Scheme employers know about the Employer resources section of the administrator websites and the bite-size training available for employers in England and Wales:

[Employer resources – England and Wales](#)

[Employer resources - Scotland](#)

New version of Payroll guide published

On 31 July 2020, we published version 4.1 of the Payroll guide for LGPS employers in England and Wales. You can find clean and tracked versions of the guide on the [Employer guides and documents page](#) of www.lgpsregs.org. The guide has been updated to improve accessibility and to include 2020 updates. We have also updated the guide in response to a query concerning the calculation of assumed pensionable pay (APP). You can read more about this change in the next article.

Calculation of assumed pensionable pay

We have received a query concerning how regular lump sum payments should be treated by an employer when working out APP.

Regulations 21(4) and 21(5) of the LGPS Regulations 2013 say:

(4) Subject to paragraphs (4A), and (5A) to (5C), the annual rate of **assumed pensionable pay** for an employment for a **Scheme year** is-

(a) where the member is paid monthly-

(i) the **pensionable pay** the member received relating to that employment in the three months preceding the commencement of the pay period in which the circumstance specified in paragraph (2) began or, for the purposes of regulations **39(1)(a)** (calculation of ill health pension amounts), **40(3)** (death grants: active members), **41(4)(b)** (survivor benefits: partners of active members), **42(4)(b)**, **42(5)(b)**, **42(9)(b)** and **42(10)(b)** (survivor benefits:

children of active members), the pay period in which, respectively, the ill-health retirement or death occurred;

(ii) less any lump sum received during that period;

(iii) with the resulting sum being grossed up to an annual figure;

(iv) to which any regular lump sum payment received in the last 12 months preceding the date specified in paragraph (i) should be added;

[(b) explains the calculation for a member paid other than monthly]

5) For the purposes of paragraph (4) a "regular lump sum" is a payment for which the member's employer determines there is a reasonable expectation that such a payment would be paid on a regular basis.

Regulations 21(4) and 21(5) of the LGPS (Scotland) Regulations 2018 set out almost identical provisions. Regulations 23(4) and 23(5) of the LGPS Regulations (Northern Ireland) 2014 set out similar provisions. One difference is that in Northern Ireland, a lump sum is only deducted from the calculation initially if it is 'not payable every pay period'.

In earlier versions of our guides, we suggested that the employer had to assess whether any lump sum payment paid in the 12 months before the start of the APP period would be paid again during the period that APP applies. The employer then decides whether to add that lump sum back into the APP annual rate. Our current interpretation of the regulations is that the employer must assess whether any lump sum payment is regular. Any regular lump sum paid in the 12 months before the start of the APP period **must be** added into the annual APP figure. There is no requirement for the employer to assess how long the APP period is likely to last, nor the likelihood that the lump sum would have been paid again during that period.

Action for administering authorities

Please remind Scheme employers about the requirement to calculate APP and let them know that we have amended our guidance on how they should perform that calculation. Employers in England and Wales can learn more about calculating APP in the Payroll guide which they can find on the [Employer guides and documents](#) page of www.lgpsregs.org and from the [employer bite-size training](#) modules.

Call for input on pensions dashboards data standards published

We let you know in [Bulletin 197](#) that the Money and Pensions Service (MaPS) had published working papers:

- Data scope – which addresses the coverage of pensions dashboards and
- Data definitions – which considers the information dashboards should display.

The [MaPS has now launched a call for input](#) on the areas covered by these two working papers. Responses will help the MaPS to deliver an initial set of data standards. The online survey will close on 31 August 2020.

National LGPS Frameworks July news Bulletin

The [National LGPS Frameworks July News Bulletin](#) has been published. The bulletin contains updates on:

- the successful launch of the pensions administration software framework in April 2020
- actuarial, Benefits and Governance Consultancy Services framework extended by 12 months due to COVID-19. The new expiry date for this framework is 30 June 2021
- global custody services framework re-let planned for February or March 2021
- framework extensions and re-lets due to COVID-19.

Please visit the [National LGPS frameworks website](#) if you would like to find out more, or contact NationalLGPSFrameworks@norfolk.gov.uk.

The Finance Act 2020

The [Finance Act 2020](#) received royal assent on 22 July 2020. The Act introduces:

- the changes to the tapered annual allowance for the 2020/21 year that we summarised in the [2020 annual update bulletin](#), and
- temporary relaxations to the protected pension age rules for those who return to work to help an employer respond to the COVID-19 pandemic.

Training

Our Fundamentals course aimed at elected members and others who attend pension committees and local pension boards will not be running in its normal format this year. Instead, we are planning a series of short webinars in early October 2020 which will cover some of the main topics included in the Fundamentals training. These events will be advertised in August.

We have launched online bite-size training for LGPS employers in England and Wales. You can read more about these courses in the earlier article in this bulletin covering [Updates to administrator websites](#).

If you have any training requests or feedback about the employer bite-size training, please contact training.lgps@local.gov.uk

Wider landscape

Money and Pension Service (MaPS) launches Money Navigator tool

The MaPS has launched a new online tool to help people navigate their finances in the wake of the coronavirus. The [Money Navigator Tool](#) provides personalised guidance based on the users responses to a short series of question. You can read more about the [launch of the Money Navigator Tool](#) on the MaPS website.

FCA launches enhanced Financial Services Register

On 27 July 2020 the [FCA launched its updated Financial Services Register](#). The re-design aims to make the register easier to use and understand. The register is a vital tool to help consumers find firms and approved individuals that are involved in regulated activities. It can help consumers avoid scams and protect themselves from harm.

Legislation

Acts

[Finance Act 2020](#) [2020/14]

Statutory Instruments

[The Marriage and Civil Partnership \(Northern Ireland\) Regulations 2020](#)

[SI2020/742]

Useful links

[LGA Pensions page](#)

[LGPS member website \(England and Wales\)](#)

[LGPS member website \(Scotland 2015\)](#)

[LGPS Advisory Board website \(England and Wales\)](#)

[LGPS Advisory Board website \(Scotland\)](#)

[LGPS Regulations and Guidance website \(England and Wales\)](#)

[LGPS Regulations and Guidance website \(Scotland\)](#)

[Public Sector Transfer Club](#)

[Recognised Overseas Pension Schemes](#) that have told HMRC that they meet the conditions to be a ROPS and have asked to be included on the list.

LGPS pensions section contact details

If you have a technical query, please email query.lgps@local.gov.uk and one of the team's LGPS pension advisers will get back to you.

Jeff Houston (Head of Pensions)

Telephone: 07786 681936

Email: jeff.houston@local.gov.uk

Lorraine Bennett (Senior Pensions Adviser – LGPC Secretariat)

Telephone: 07766 252847

Email: lorraine.bennett@local.gov.uk

Jayne Wiberg (Pensions Adviser – LGPC Secretariat)

Telephone: 07979 715825

Email: jayne.wiberg@local.gov.uk

Rachel Abbey (Pensions Adviser – LGPC Secretariat)

Telephone: 07827 307003

Email: rachel.abbey@local.gov.uk

Steven Moseley (Pensions Adviser – LGPC Secretariat)

Telephone: 07780 227059

Email: steven.moseley@local.gov.uk

Karl White (Pensions Adviser (Training) – LGPC Secretariat)

Telephone: 07464 652886

Email: karl.white@local.gov.uk

Bob Holloway (Pensions Secretary – LGPS Scheme Advisory Board (E&W))

Telephone: 07919 562847

Email: robert.holloway@local.gov.uk

Liam Robson (Pensions Analyst – LGPS Scheme Advisory Board (E&W))

Telephone: 0207 664 3328

Email: liam.robson@local.gov.uk

Elaine English (LGPS Executive Officer)

Telephone: 07909 988968

Email: elaine.english@local.gov.uk

Further information

Copyright

Copyright remains with Local Government Association (LGA). This bulletin may be reproduced without the prior permission of LGA provided it is not used for commercial gain, the source is acknowledged and, if regulations are reproduced, the Crown Copyright Policy Guidance issued by HMSO is adhered to.

Disclaimer

The information contained in this bulletin has been prepared by the LGPC Secretariat, a part of the Local Government Association (LGA). It represents the views of the Secretariat and should not be treated as a complete and authoritative statement of the law. Readers may wish, or will need, to take their own legal advice on the interpretation of any piece of legislation. No responsibility whatsoever will be assumed by the LGA for any direct or consequential loss, financial or otherwise, damage or inconvenience, or any other obligation or liability incurred by readers relying on information contained in this bulletin.

Whilst every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring to the attention of the Secretariat any perceived errors or omissions by emailing query.lgps@local.gov.uk.

This page is intentionally left blank

 <p>Brent</p>	<p>Pension Board 3 November 2020</p>
<p>Report from the Director of Finance</p>	
<p>Brent Risk Register</p>	

Wards Affected:	N/A
Key or Non-Key Decision:	N/A
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	Two 1. Risk Register 2. Risk Strategy
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Minesh Patel, Director of Finance Ravinder Jassar, Head of Finance Sawan Shah, Senior Finance Analyst Saagar Raithatha, Finance Analyst Chidanand Bahadoor, Graduate Finance Trainee

1.0 Purpose of the Report

1.1 This report presents the updated Risk Register for the Brent Pension Fund Pensions Administration Service.

2.0 Recommendation(s)

2.1 The board is asked to note the report.

3.0 Background

3.1 Effective risk management is the foundation of sound corporate governance and for the LGPS the focus should be on all aspects of the scheme's operation, not just investment matters. Having a strategy and register in place is a way for the scheme manager to identify and manage scheme risks and it is considered good practice to have a strategy and register in place alongside established reporting mechanisms.

3.2 Using guidance from The Pensions Regulator and CIPFA, together with Brent's internal risk management resources, a process was undertaken in 2018 to produce

a risk management strategy that was unique to Brent's circumstances. This involved a workshop that identified all of the relevant risks, assessed those risks in terms of likelihood, understanding risk management and contingency planning, monitoring risks and documentation in a register.

3.3 It is recognised that risk management works well when the administering authority, the Pension Board and employers work together. All parties then understand each other's capacity and appetite for risk. Key elements of this strategy were discussed at a recent working party set up with the scheme manager, administrator and select employers for feedback and comment. The Risk Strategy is attached to this report in Appendix 2.

3.4 It has been agreed in previous Board meetings that the Risk Register would become a standing agenda item at these meetings, with new risks and any changes to classifications of risks being reported to the board.

3.5 Key changes to the Risk Register:

- Exit Pay Reform - New legislation which will alter the redundancy benefit entitlements to LGPS members aged 55 and above.
- Following the close of the McCloud consultation, Brent Officers have now provided a response to MHCLG following discussions with the Fund's actuary, Officers are now in discussions with LPP and Hymans to prepare for the impact as we await the government's formal response to the consultation and the subsequent change in regulations enacted in law.
- Brent Pension Fund Accounts 2020/21 have been signed off by the Auditors. The Brent Pension Annual Report is currently going through the audit sign-off process.

The board is asked to notify the scheme manager if it disagrees with these classifications and present any new risks that they would like to be considered.

3.6 The revised Risk Register is attached at Appendix 1 and it is proposed to present any changes or updates to this document to the Pension Board at every meeting.

4.0 Financial Implications

4.1 There are no specific financial implications associated with noting this report.

5.0 Legal Implications

5.1 None arising directly from this report

6.0 Equality Implications

6.1 None arising directly from this report

7.0 Consultation with Ward Members and Stakeholders

7.1 Not applicable for this report.

8.0 Human Resources/Property Implications (if appropriate)

8.1 None arising directly from this report

Report sign off:

Minesh Patel

Director of Finance

This page is intentionally left blank

The London Borough of Brent Pension Fund Risk Register 2020

Index	A	B	C	D	E	F	G	H	I	J
1	Risk Area Disaster Recovery	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment 1
1.1	Operational Disaster Recovery Plans Brent	Loss of or unable to access admin systems for: a) Pensions b) Payroll c) Pensioner payroll	1	10	10	Brent Council Business Continuity Procedures	Brent	Annual	2020	Brent Council disaster recovery plan in place
1.11		Pension Systems I.T.	1	10	10	Database of all: a) Advisors b) Suppliers c) Contracts	Brent	Annual	2020	Held as hard copy by Brent Council's Legal Department
1.2	Operational Disaster Recovery Plans LPP	Loss of or unable to access LPP admin systems for pensions	1	6	6	LPP Shared Service Agreement.	LPP	Annual	2020	From 1 October 2018 LPP disaster recovery plan in place as part of their Shared Service Agreement with Brent Council.
1.21		LPP Pensions Admin System (Altair) used by Brent Council Employers, Maintained Schools and Academy's	1	6	6	LPP Shared Service Agreement	LPP	Annual	2020	LPP have a recovery plan in place for their pension admin platform Altair (External provider Aquila/Haywood)
2	Risk Area Business Continuity Planning	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
2.1	Business Continuity	LPP Financial Standing	1	10	10	LPP Service Contract	Brent	Annual	2020	Brent Council discuss LPP budget at regular contract monitoring meetings.
3	Risk Area Risk Planning	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
3.1	Risk Planning And Monitoring	Not monitoring: a) Risk and the risk plan b) And amending it as required c) Or adding new areas of risk as they appear Will lead to the risk plan being: a) Inaccurate b) Known risks not being accounted for c) No plans to address these risks	1	10	10	Risk Plan	Brent	Annual	2020	The Risk Register is monitoring and reviewed by the Scheme Manager and the Pensions Board. Areas of risk are when required: a) Updated b) Amended c) New risks added if identified
4	Risk Area Data Security	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
4.1	Data Security	External attack, loss of data, locked out of data, poor internal procedures can lead to an increased risk of attack from: a) outside b) or internal fraud	2	10	20	Brent Council Data Security Procedures	Brent	Annual	2020	Procedures on data security in place, systems kept up to date with latest security updates
4.12		Not backing up data regular using secure backup systems	2	10	20	Data Back Up Procedures.	Brent	Annual	2020	Data is backed up on an incremental basis daily and fully backed up weekly, data kept in secure sites.
4.13		a) Clean desk policies not being adhered to: b) Cabinets left open or not locked c) Documents left out overnight d) Documents left on colleagues desk when they are away e) Computer not locked when operator leaves their desk	2	5	10	Brent Council Data Security Procedures	Brent	Annual	2020	Possibility of: a) Sensitive data being seen by unauthorised persons b) Data theft c) GDPR breached e) Brent Councils reputation put at risk
4.14		Taking laptops away from desk that are not password protected with encryption, using them on public transport Not storing laptops in secure location when not in use	1	5	5	Brent Council Data Security Procedures	Brent	Annual	2020	This can lead to: a) Large losses of sensitive data b) Unauthorised people seeing sensitive data while on public transport c) Breach of GDPR d) Breach of Councils policies and dismissal from service
4.2	General Data Protection Regulations	General Data Protection Regulations (GDPR) came into effect 25 May 2018, failure to comply with GDPR will lead to: a) Complaints b) Data breaches c) Possible fines d) Loss of reputation	1	10	10	Brent GDPR Policies	Brent	Annual	2020	Brent has GDPR policies in place and publishes GDPR privacy notices: a) Online b) Yammer c) In news letters d) In communications to its members, employers, academy's, maintained schools
4.21		Sending sensitive data by email ensuring it will be sent to the right recipient and encrypted, or using a secure transmission system	2	8	16	Brent GDPR Policies	Brent	Annual	2020	Sensitive data being sent to an unauthorised person or business leading to breach of GDPR
4.3	Cyber Security	Unlawful cyber access or attacks could be serious for a scheme and its members, and could in the end result in identity theft, loss of data or even loss of financial assets	2	10	20	Brent Council Data Security Procedures LPP Cyber Security Procedures	Brent	Annual	2020	Both Brent and LPP have significant cyber security policies and procedures in place to prevent and deter cyberattacks. The impact of a cyber attack could be significant, so it is important for these to be permanently up to date.
5	Risk Area Pension Administration	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
5.1	(Backlog) LPP Pension Administration Post Capita Handover November 2018	Backlog of work from Capita: a) Delay in administrative processing because of incomplete scheme data b) Increased administration costs c) Members benefits being delayed d) Increase in complaints e) Places an unwarranted and costly drain on Brent resources	5	10	50	LPP Shared Service Agreement	Brent	Monthly	Monthly	Extra resource outside of BAU provided by the LPP, phase 1 complete. Plan in place to treat the backlog inherited from Capita as being done as a separate project so resources not take away from BAU administration. Phase 2 under consideration.
5.2	(Scheme Data) Scheme Data Provided to LPP by Capita for: Maintained Schools Academy's Employers	Missing common and Scheme Specific data not provided by employers, maintained schools and academy's leads to delay in progressing administration for members	5	10	50	LPP Data Check November 2018	Brent	Annual	2020	LPP run a test of the data sent by Capita October 2018 Common Data 98% improved from 2017 Scheme Specific data 93% same as 2017
5.3	Record Keeping Planning	Not updating the record keeping plan to take into account changes of circumstances through the year could lead to a failure to take corrective action leading to a drop in the quality of scheme data or delays in processing member benefits	5	10	50	RKP 2019	Brent	Monthly	Monthly	Brent record keeping plan to be created to deal with poor common data and scheme specific data being below requirements as highlighted the LPP November 2018 data check. Phase 1 of data cleanse project is now complete. Officers are working with LPP to identify requirements of phase 2 of the project.

5.4	(Employer Data) Maintained Schools Academy's Employers Supplied Data to Capita	Failure by Maintained Schools, Academy's, Employers to provide data accurately and on time to the LPP results in poor scheme data held by the LPP	5	10	50	PAS 2018	Brent	Annual	2020	Employers to export data monthly to LPP system highlighting data problems by import validation, also reporting from the admin systems of missing files leads to early indication of employers having data problems Training to be provided to employers by the LPP on using the systems and what LPP requires from employers Revised PAS sets out what employer need to be doing
5.5	Loss of Key Staff Members	Specialist nature of the work means there are relatively few staff members with knowledge of the Local Authority Pensions Regulations and Pensions Administration requirements. Significant knowledge gap left if specialist staff leave, likely to cause short-term disruption.	4	8	32	Training Plan	Brent	Annual	2020	Key Officers to ensure processes are documented and knowledge is being passed on to other members of the team, to ensure limited disruption in the event of an unexpected absence or leaving the position. Training events delivered by external parties are available and staff are encouraged to attend External Support is available to mitigate this risk, both from external advisors and LPP who manage the fund's administration
5.6	Impact of Coronavirus (COVID-19)	Increase in staff who are unwell leading to: a) Delays in administrative processing and increase in backlog cases b) Member benefits being delayed c) Increase in complaints d) Difficulties in meeting key deadlines such as year-end Delays in implementing the agreed investment strategy due to volatile financial markets.	10	7	70	Brent Council Business Continuity Procedures LPP Business Continuity Procedures Hymans Robertson Business Continuity Plan (as Fund Actuary and Investment Advisors)	Brent	Ongoing	Ongoing	Situation is being monitored on an ongoing basis. Staff to observe Government and NHS guidance which is being updated on a regular basis. Increased use of flexible and remote working technologies are now in place to enable staff to operate in an efficient and effective manner. The Pensions Administration and Finance team have shifted to working from home. Priority over the last few months has been focussed on ensuring completion of year end activities and prioritisation of admin related tasks such as death benefits, retirements including ill health and refunds. The Fund will not experience any issues in payment of member benefits as a result of market movements. The Fund will continue to hold a well-diversified portfolio of investments and maintain a long-term perspective.
6	Risk Area Plan Events	Risk Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
6.1	Pension Plan Events Planning	Plan events such as: a) Annual benefits statements b) Year end reporting to the TPR c) Accounting d) Pension increases e) Plan valuations f) All require planning in advance to ensure completion on time	4	10	40	Plan Calendar	Brent	Annual	2020	Plan Calendar to identify events: a) What work is required b) What recourses will be used c) Completion and sign off
6.12		Pension projects such: a) GMP reconciliation b) Changes in legislation that needs to be actioned c) GMP equalised for men and woman	5	10	50	Plan Calendar	Brent	Annual	2020	To allow longer term planning for items such as: a) GMP reconciliation b) New legislation coming in to effect c) Ensure Plan events are completed on time d) Prepare for GMP equalisation
6.2		Failure to have the necessary correct and accurate data will lead to: a) Statements not being sent b) Possible delay sending statements whilst this data is obtained and systems updated	6	10	60	LLP Shared Service Agreement	Brent	Annual	2020	Data improvement being carried out under RKP 2019
6.21	Active Benefits Statements 2019/20	Annual Benefits Statement dependant on: a) Common Data b) Scheme Specific data c) Data being improved from the RKP 2019 (RKP 2019 to be finalised December 2018)	5	10	50	LLP Shared Service Agreement	Brent	Annual	2020	Improvement to common and Scheme Specific data being carried out under RKP 2019
6.3	Deferred Member Benefit Statements 2019/20	Incorrect Statuses, no address, missing data to calculate leads to: a) Statements not being issued b) statement inaccurate c) Incorrect valuation and liabilities for the Plan.	5	10	50	LLP Shared Service Agreement	Brent	Annual	2020	Member data is being dealt with under the 2019 Record keeping Plan
6.4	Year End Return	Failure to complete year end return and submit on time leads to fines	2	10	20	PAS 2018 & Plan Calendar	Brent	Annual	2020	All Plan calendar events to be recorded with plans to ensure they are carried out, better planning for EOY with pro active action to get employers to provide data on time in place. Training session provided to employers to assist completion.
6.5		Failure to process an admission agreement within the time frames set on in LGPS regulations can lead to transferring employers pension entitlements being delayed, legal issues stopping the agreement from being implemented and costs incurred that can not be recovered	5	10	50	Internal Controls	Brent	Annual	2020	Process for admission agreements to be strengthened
6.52	Admission Agreements	Not having procedures and processes to processes and monitor agreements are on track and any reason for delayed identified and acted on could lead to delays in implementation of the agreement	5	10	50	Internal Controls	Brent	Annual	2020	Monitoring for admission agreement to be improved
6.53		Oversight of the legal team and ensuring that they are processing the legal agreements in the time set out in the procedures and requirements of admission agreements is a major factor on processing an admission agreement on time	5	10	50	Internal Controls	Brent	Annual	2020	Overseeing of the legal team on admission agreement by the Scheme Manager to ensure no delays and prompt processing of agreement becomes a priority
6.54		Failure to keep to rules and regulation on admission agreement will require this failure to be reported to the TPR	5	10	50	Internal Controls	Brent	Annual	2020	Breaches log to bring attention of failing and lessons learned in processing admission agreements
7	Risk Area Auto Enrolment	Risk Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
7.1	Auto Enrolment	Failure to process auto enrolment on time leads to: a) Member complaints b) Members unable to opt out or in c) Delayed administration d) Possible action by the regulator to improve or be fined	1	40	40	Auto Enrolment Procedures	Brent	2020	2020	Auto enrolment checked monthly for: a) Enrolment b) Opt outs c) Opt Ins d) Auto Enrol Renewal, as part of Brent procedures for pensions and payroll
8	Risk Area Regulatory	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
8.1	Anti Fraud Initiatives Mortality Existence	Benefits paid to people not entitled to benefits from the LGPS	2	5	10	2019 Anti Fraud Plan	Brent	Annual	2020	Administration processes check for fraud
8.2	Pension Board Training	Pension Board members not having the appropriate degree of knowledge and understanding to perform their duties. Pension Board member not having the right knowledge to make informed decisions and challenge Officers of the Council	1	5	5	Pension Board Training Plan	Brent	Annual	2020	Regular training is provided via a training programme for Pension Board members All Pensions Board members to complete and pass the TPR public pensions course online

8.3	Pension Board Conflict Of Interest	Conflicts of interest must be declared in the Register of Interests Failure to declare an interest can lead to serious consequences and pose a risk to the Plan and possibly member	1	5	5	Conflict of Interest Register	Brent	Annual	2020	The register of interests and other relevant documents are circulated to the Pension Board for ongoing review and are published on the Brent Council's website
8.4	Governance	Failure to have good governance plans in place which are reviewed and monitored can lead to: a) Poor administration b) Increased administration costs c) Poor investment outcomes d) Increased levels of risk e) Not understanding what the risks are and having plans to manage the risk f) Statutory requirements not being met such as: g) Annual benefits statements not being produce and sent out h) Pension saving statements not being produce and sent out i) Year end returns late	1	3	3	Multi areas cover governance: a) Plan Rules b) Business Plan c) PAS 2018 d) Scheme Manager e) Pensions Board f) Pensions Sub Committee.	Brent	Annual	2020	Governance is monitored by: a) Scheme Manager b) Pensions Board c) Pensions Sub Committee d) Internal and External Controls
8.5	Failure to make provision for oversight of the administration of the Plan	Failure to ensure that overall oversight is in place and carried out can lead to: a) Breaches of the law b) Poor administration and record keeping c) Unauthorised payments d) Poor administration being allowed to continue e) Failure to meet deadline on time f) Possible fines g) Fraud to occur h) Loss of confidence and reputation for the Council	1	2	2	The Pension Board assists the Scheme Manager in the provision of oversight of how the Plan is administered	Brent	Ongoing	2020	The oversight of the plan is carried out by the Scheme manager with assistance from the Pension Board
8.6	Discretions	A decision to add pension or disregard a reduction on pension for early payment leads to increased costs to the employer	1	5	5	Chief Financial Officer	Brent	Annual	2020	Discretions under review on early retirement with actuarial reduction, Discretions are covered under LGPS Rule 30 (2&5) In preparing such a statement the Council must have regard to the extent to which the discretions are exercised to avoid a loss of confidence in the service provided
8.7	Data Protection Breaches	Breaches not recorded and failure to report a breach to the regulator can lead to fines and loss of reputation	3	6	18	Breaches Log	Brent	Monthly	Monthly	Breaches log to monitor all breaches and report of breached to the regulator
9	Risk Plan Funding & Accounting	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
9.1	The Fund's Assets Insufficient To Meet Long Term Liabilities	Pension Fund Assets not sufficient to pay: a) Pension benefits b) Transfers c) Death benefits d) Could lead to raising of pensions contributions e) Plan has to reduce benefits f) Reassessment of the funding strategy	2	10	20	Public Sector Payroll Controls	Brent	2020	Monthly	Contributions are checked on a monthly basis Overdue Contributions: Employers Academy's Maintained Schools Are actively chased
9.11			1	10	10	The Funding Strategy Statement	Brent	Tri Annual	2022	A report on the 2019 Triennial Review (including the Funding Strategy Statement) was presented to the Pension Board at the March 2020 meeting.
9.12			1	10	10	Fund's Funding Level Assessment	Brent	Monthly	Monthly	The Fund receives regular performance reports on its investments from the custodian. The Fund actuary, Hymans Robertson, completes a valuation of liabilities every 3 years.
9.2	Impact of McCloud judgement on Long Term Liabilities	Court of Appeal ruling that transitional protections were unlawful on the grounds of age discrimination could increase employer contributions.	8	6	48	Triennial valuation/ Funding Strategy Statement	Brent	Quarterly	Ongoing	Following the close of the McCloud consultation, Brent Officers have now provided a response to MHCLG following discussions with the Fund's actuary, Hymans Robertson and the Fund's admin provider LPP. At this stage, it is likely that greater admin resource will be required and it is expected that there will be a cost to the Pension Scheme. Officers are now in discussions with LPP and Hymans to prepare for the impact as we await the government's formal response to the consultation and the subsequent change in regulations enacted in law.
9.3	Exit Pay Reforms	New legislation being introduced in the autumn which will alter the way redundancy benefits are carried out for members aged 55 and over.	8	6	48	Governance & Compliance	Brent	Quarterly	Ongoing	New legislation which will alter the redundancy benefit entitlements to LGPS members aged 55 and above. The MHCLG consultation closes on 8 November, however the legislation is set to be in place by this autumn. There will not be sufficient time to reconfigure the pensions system and therefore certain manual calculations will need to be undertaken in the interim period.
9.4	Pension Contributions not Paid by:	Effects the Plans abilities to: a) Pay out benefits b) Braking the law on pension contribution collections. c) Unnecessary costs for chasing for contributions. d) Continuing non payment for pension contributions will lead to: e) Breaches for the payment of pension contribution regulations f) Being reported for breaches as required by law g) Delay benefits beginning paid h) Can lead to delays in accounting for pension contributions	2	10	20	PAS	Brent	2020	2020	Procedures in place to deal with pension contributions not being made or late
9.41	Maintained Schools Academy's Employers	a) On time b) Or not at all c) Refusal to pay	2	10	20	PAS	Brent	Annual	2019	Enggong with: a) Employers b) Academy's c) Maintained Schools d) With working parties and employer forums e) LPP to provide more support in this area
9.42			2	10	20	PAS	Brent	2020	2020	Contributions are monitored on a monthly basis and late or non payers reported. 2019 Revised PAS to include fines for non compliers
9.5			2	10	20	Annual audit	Brent	Annual	2020	Accounts for the year to 31 March 2020 went through review with Grant Thornton and has been signed off. Annual reports has been produced and is currently going through the audit sign off process.
9.51	Pension Plan Accounting	Failure to comply with accounting regulations will lead to serious consequences: a) Possible fines b) Loss of reputation	1	10	10	Triennial valuations	Brent	Tri Annual	2022	2019 Triannual completed. Next triannual valuation 2022
9.52			1	10	10	The Funding Strategy Statement	Brent	Tri Annual	2022	A report on the 2019 Triennial Review (including the Funding Strategy Statement) was presented to the Pension Board at the March 2020 meeting.
9.53			1	10	10	Fund's Funding Level Assessment	Brent	Monthly	Monthly	The Fund receives regular performance reports on its investments from the custodian. The Fund actuary, Hymans Robertson, completes a valuation of liabilities every 3 years.

Risk level Reasoning	Likelihood		Impact	Score	Risk Types	Risk Planning	Expected Outcomes
	Risk level	%	1 Least Likely 10 Most Likely	1 Least Likely 10 Most Likely			
Low	1 to 20	1	10	10	Risk known	Planned for in advance	Countered by plans and procedures in place if needed
Low to Medium	21 to 50	2	10	20	Risk possible concerns	Monitored	Monitored and plans in action or more actions will be put in place if required
Medium to High	51 to 75	5	10	50	Risk manageable	Managed	Active and pro active longer term plans in place, subject to close monitoring and rapid action if required
High	76 to 100	8	10	80	Risk having a major impact	Planned actions in place	Action plans in place, monitored weekly, longer term before risk will reduce



Brent

London Borough of Brent Risk Strategy

Brent Risk Strategy July 2018

Table of Contents

1. Introduction	3
2. Strategy objectives.....	3
3. Purpose of the strategy	3
4. Effective date	4
5. Review	4
6. Scope.....	4
7. Risk Management Philosophy	4
8. CIPFA and the Pensions Regulator’s Requirements	4
9. Responsibility	6
10. The London Borough of Brent Pension Fund Risk Management Process	6
11. Reporting and monitoring	8
13. Risk Register Appendix A.....	9

1. Introduction

1.1 This is the Risk Strategy for the London Borough of Brent Fund ("the Fund"), which is part of the Local Government Pension Scheme ("LGPS") managed and administered by the London Borough of Brent ("the Administering Authority").

The Risk Strategy details the Fund's approach to managing risk including:

- the risk approach adopted for the management of the Fund, attitudes to risk, how risk is managed and implemented
- risk management responsibilities
- the procedures that are adopted in the Fund's risk management process
- the key internal controls operated by the Administering Authority and other parties responsible for the management of the Fund

2. Strategy objectives

2.1 In relation to understanding and monitoring risks, the Administering Authority aims to:

- integrate risk management into the procedures, internal controls, and the day-to-day activities of the Fund
- raise awareness of the need for risk management by all those connected with the management of the Fund including, the Pensions Board, maintained schools, academy's, employers and other partners
- minimise the probability of negative outcomes for the Fund and its stakeholders
- establish and maintain a robust framework and procedures for identification, analysis, assessment and management of risk, and the reporting and recording of events, based on best practice and TPR guidance of risk
- ensure consistent application of the risk management methodology across all Fund activities, including projects and partnerships.

2.2 To assist in achieving these objectives in the management of the Fund, the Administering Authority will aim to comply with:

- the CIPFA Managing Risk publication
- the Pensions Act 2004
- the Pensions Regulator code of practise 14 as related to risk
- the pensions Regulator Essential guide to the public service code as related to risk

3. Purpose of the strategy

3.1 The Administering Authority recognises that effective risk management is an essential element of good governance in the LGPS. By identifying and managing risks through an effective policy and risk management strategy, the Administering Authority can:

- demonstrate best practice in governance
- improve financial management
- minimise the risk and effect of adverse conditions
- identify and maximise opportunities for improvement and a reduction in risk along with better outcomes for members
- minimise threats

3.2 The Administering Authority adopts best practice risk management, which supports a structured and focused approach to managing risks, and ensures risk management is an integral part in the governance of the Fund at a strategic and operational level.

4. Effective date

4.1 This policy is to go before the Pension Board on 24 July 2018 for approval and will be in effect from that date.

5. Review

5.1 To be viewed quarterly by the Scheme Manager and the Pensions Board and updated as required, or if the risk management arrangements, or other matters included within it, merit reconsideration.

6. Scope

6.1 This Risk Strategy applies to all members of the Pension Board and the Pensions Fund SubCommittee, including scheme member and employer representatives. It also applies to officers involved in the management of the Fund including the Chief Finance Officer (Section 151 Officer), Head of Finance and the Head of Pensions.

6.2 Advisers and suppliers to the Fund are also expected to be aware of this Policy, and assist officers, Committee and Sub-Committee members and Board members as required in meeting the objectives of this Policy.

7. Risk Management Philosophy

7.1 The Administering Authority recognises that it is not possible to eliminate all risks. Accepting and actively managing risks is therefore a key part of the risk management strategy for the Fund.

7.2 In managing risk, the Administering Authority will:

- ensure that there is a proper balance between risk taking and the opportunities to be gained
- adopt a system that will enable the Fund to anticipate and respond positively to change
- minimise loss and damage to the Fund and to other stakeholders who are dependent on the benefits and services provided
- make sure that any new areas of activity (new investment strategies, further joint-working, framework agreements etc.), are only undertaken if the risks they present are fully understood and taken into account in making decisions.

7.3 The benefits of a sound risk management approach include better decision-making, improved performance and delivery of services, more effective use of resources and the protection of reputation.

8. CIPFA and the Pensions Regulator's Requirements

8.1 CIPFA Managing Risk Publication

CIPFA has published technical guidance on managing risk in the LGPS. The publication explores how risk manifests itself across the broad spectrum of activity that constitutes LGPS financial management and administration, and how, by using established risk management techniques, those risks can be identified, analysed and managed effectively.

The publication also considers how to approach risk in the LGPS in the context of the role of the administering authority as part of a wider local authority and how the approach to risk might be communicated to other stakeholders.

8.2 The Pension Regulator's Code of Practice

The Public Service Pensions Act 2013 added the following provision to the Pensions Act 2004 relating to the requirement to have internal controls in public service pension schemes.

249B Requirement for internal controls: public service pension schemes

1) The scheme manager of a public service pension scheme must establish and operate internal controls which are adequate for the purpose of securing that the scheme is administered and managed: (a) in accordance with the scheme rules, and
(b) in accordance with the requirements of the law.

(2) Nothing in this section affects any other obligations of the scheme manager to establish or operate internal controls, whether imposed by or by virtue of any enactment, the scheme rules or otherwise.

(3) In this section, "enactment" and "internal controls" have the same meanings as in section 249A." Section 90A of the Pensions Act 2004 requires the Pensions Regulator to issue a code of practice relating to internal controls. The Pensions Regulator has issued such a code in which he encourages scheme managers (i.e. administering authorities in the LGPS) to employ a risk based approach to assessing the adequacy of their internal controls and to ensure that sufficient time and attention is spent on identifying, evaluating and managing risks and developing and monitoring appropriate controls.

The Pensions Regulator's code of practice guidance on internal controls requires scheme managers to carry out a risk assessment and produce a risk register which should be reviewed regularly.

The risk assessment should begin by:

- setting the objectives of the scheme
- determining the various functions and activities carried out in the running of the scheme, and
- identifying the main risks associated with those objectives, functions and activities.

The code of practice goes on to say that schemes should consider the likelihood of risks arising and the effect if they do arise when determining the order of priority for managing risks, and focus on those areas where the impact and likelihood of a risk materialising is high. Schemes should then consider what internal controls are appropriate to mitigate the main risks they have identified and how best to monitor them. The code of practice includes the following examples as issues which schemes should consider when designing internal controls to manage risks:

- how the control is to be implemented and the experience of the person(s) performing the control
- the level of reliance that can be placed on information technology solutions where processes are automated
- whether a control is capable of preventing future recurrence or merely detecting an event that has already happened
- the frequency and timeliness of a control process
- how the control will ensure that data are managed securely, and
- the process for flagging errors or control failures, and approval and authorisation controls.

The code states that risk assessment is a continual process and should take account of a changing environment and new and emerging risks. It further states that an effective risk assessment process will provide a mechanism to detect weaknesses at an early stage and that schemes should periodically review the adequacy of internal controls in:

- mitigating risks
- supporting longer-term strategic aims, for example relating to investments
- identifying success (or otherwise) in achieving agreed objectives, and
- providing a framework against which compliance with the scheme regulations and legislation can be monitored.

8.3 The Administering Authority adopts the principles contained in CIPFA's Managing Risk in the LGPS document and the Pension Regulator's code of practice in relation to the Fund. This Risk Strategy highlights how the Administering Authority strives to achieve those principles through use of risk management processes and internal controls incorporating regular monitoring and reporting.

9. Responsibility

9.1 The Administering Authority must be satisfied that risks are appropriately managed. For this purpose, the officers are responsible for ensuring the process outlined below is carried out, subject to the oversight of the Pension Board.

However, it is the responsibility of each individual covered by this Strategy to identify any potential risks for the Fund and ensure that they are fed into the risk management process.

10. The London Borough of Brent Pension Fund Risk Management Process

10.1 The Administering Authority's risk management process is in line with that recommended by CIPFA and is a continuous approach which systematically looks at risks surrounding the Fund's past, present and future activities. The main processes involved in risk management are identified in the figure below and detailed in the following sections.

(1)	Risk Identification
(2)	Risk Analysis
(3)	Risk Control
(4)	Risk monitoring

10.2 Risk identification (1)

The risk identification process is both a proactive and reactive one. Risks are identified by a number of means including, but not limited to:

- formal risk assessment exercises overseen by the Scheme Manager, Pension Board, and Pension Sub Committee
- performance measurement against agreed objectives
- monitoring against the Fund's business plan to be available Q4 2018
- findings of internal and external audit and other adviser reports
- feedback from the Pension Board, maintained schools, academy's, employers and other stakeholders
- liaison with other organisations, regional, national associations, and professional groups

Once identified, risks will be documented in the Fund's risk register, which is the primary control document for the subsequent analysis, control and monitoring of those risks.

10.3 Risk analysis (2)

Once potential risks have been identified, the next stage of the process is to analyse and profile each risk. Risks will be assessed by considering the likelihood of the risk occurring and the effect if it does occur, with the score for likelihood multiplied by the score for impact to determine the current overall risk rating, as illustrated in the table below.

Risk level Reasoning		Likelihood	Impact	Score	Risk Types	Risk Planning	Expected Outcomes
Risk Level	%	1 Least Likely 10 Most Likely	1 Least Likely 10 Most Likely	Likelihood Times Impact			
Low	1 to 20	1	10	10	Risk known	Planned for in advance	Countered by plans and procedures in place if needed
Green Low							
Low to Medium	20 to 50	2	10	20	Risk possible concerns	Monitored	Monitored and plans in action or more actions will be put in place if required
Yellow Low to Medium							
Medium to High	50 to 75	5	10	50	Risk manageable	Managed	Active and pro active longer term plans in place,
Orange Midium to High							
							subject to close monitoring and rapid action if required
High	75 to 100	8	10	80	Risk having a major impact	Planned actions in place	Action plans in place, monitored weekly, longer term before risk will reduce
Red High							

When considering the risk rating, the Administering Authority will have regard to the existing controls in place and these will be summarised on the risk register.

10.4 Risk control (3)

The Head of Finance (Pensions) will review the extent to which the identified risks are covered by existing internal controls and determine whether any further action is required to control the risk, including reducing the likelihood of a risk event occurring or reducing the severity of the consequences should it occur.

Before any such action can be taken, Pension Board and Pension Sub Committee approval may be required where appropriate officer delegations are not in place.

The result of any change to the internal controls could result in any of the following:

- Risk elimination, for example, ceasing an activity or course of action that would give rise to the risk.
- Risk reduction, for example, choosing a course of action that has a lower probability of risk or putting in place procedures to manage risk when it arises.
- Risk transfer, for example, transferring the risk to another party either by insurance or through a contractual arrangement.

The Fund's risk register details all further action in relation to a risk and the owner for that action. Where necessary the Administering Authority will update the Fund's business plan (Due Q4 2018) in relation to any agreed action as a result of an identified risk.

10.5 Risk monitoring (4)

Risk monitoring is the final part of the risk management cycle and will be the responsibility of the Pensions Board. In monitoring risk management activity, the Pension Board will consider whether:

- the risk controls taken achieved the desired outcomes
- the procedures adopted and information gathered for undertaking the risk assessment were appropriate
- greater knowledge of the risk and potential outcomes would have improved the decision-making process in relation to that risk
- are there any lessons to be learned for the future assessment and management of risks.

11. Reporting and monitoring

11.1 Progress in managing risks will be monitored and recorded on the risk register. The risk register, including any changes to the internal controls, will be provided on a quarterly basis to the Pension Board.

The Pension Committee will be provided with updates on an ongoing basis in relation to any significant changes to risks (for example where a risk has changed by a score of 10 or more) or new major risks (for example, scored 25 or more).

As a matter of course, the Pension Fund Board will be provided with the same information as is provided to the Pension Committee (or Pension Sub-Committee as appropriate) and they will be able to provide comment and input to the management of risks.

In order to identify whether the objectives of this policy are being met, the Administering Authority will review the delivery of the requirements of this Strategy on a quarterly basis taking into consideration any feedback from the Pensions Board and Pensions Sub Committee.

12. Key risks to the effective delivery

12.1 The key risks to the delivery of this Strategy are outlined below. The Pension Board will monitor these and other key risks and consider how to respond to them following updates and recommendations from officers:

- Risk management is not embodied into the day to day management of the Fund and consequently the objectives of the Policy are not delivered
- Changes in Pension Board membership and/or senior officers mean key risks are not identified due to lack of knowledge
- Insufficient resources are available to satisfactorily assess or take appropriate action in relation to identified risks
- Risks are incorrectly assessed due to a lack of knowledge or understanding, leading to inappropriate levels of risk being taken without proper controls
- Lack of engagement or awareness of external factors means key risks are not identified
- Conflicts of interest or other factors lead to a failure to identify or assess risks appropriately
- Risk plan is not monitored to ensure actions to reduce risk have been taken and new risks that

have been identified are not recorded, monitored and carried out, will lead to risk not being managed in line with Risk Policy

13. Risk Register Appendix A

The Risk Register Appendix A :

- 1 Risk Area Disaster Recovery
- 2 Risk Area Business Continuity Planning
- 3 Risk Area Risk Planning
- 4 Risk Area Data Security
- 5 Risk Area Pension Administration
- 6 Risk Area Plan Events
- 7 Risk Areas
- 8 Risk Area TPA Transition
- 9 Risk Area Regulatory
- 10 Risk Plan Funding & Accounting

End

This page is intentionally left blank

London Borough of Brent Pension Fund

Page 115

Q2 2020 Investment Monitoring Report

Kameel Kapitan, Associate Consultant
Kenneth Taylor, Associate Consultant

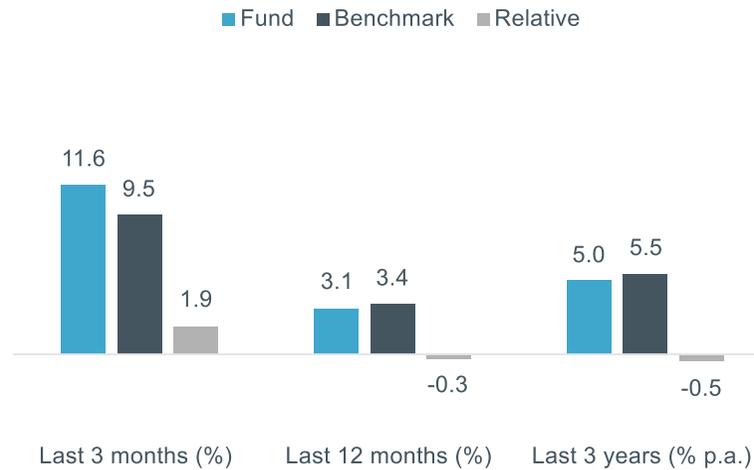
Asset classes recovered strongly during the second quarter of 2020 from the steep declines suffered in the first quarter.

Enormous amounts of stimulus provided by global central banks and reopening economies after lockdown have been the key positive drivers.

The Fund's assets produced a return of 11.6% and outperformed against the aggregate benchmark over the second quarter of 2020.

The value of the Fund's assets increased over the quarter, from £835.3m to £926.9m, recovering almost all of the ground lost during the first quarter.

Fund performance vs benchmark/target



High Level Asset Allocation

As part of the investment strategy review carried out in Q2 2020, the Fund's DGF mandates were recategorised as 'Diversifiers' and included within the 'Income' bucket.

GrIP	Actual	Benchmark	Relative
Growth	58.4%	55.0%	3.4%
Income	22.4%	30.0%	-7.6%
Protection	14.4%	15.0%	-0.6%
Cash	4.8%	0.0%	4.8%

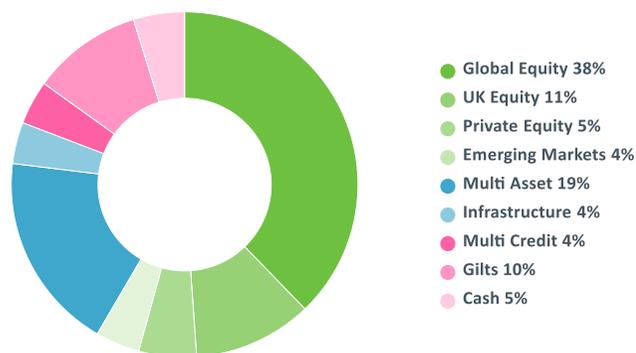
Whilst on the journey to its interim and long term targets for Property, Infrastructure and Private Debt, the current agreement is that the Fund will hold the excess assets within the DGF's, most notably the Baillie Gifford diversified growth allocation.

Asset Allocation

Manager	Valuation (£m)		Actual Proportion	Benchmark	Relative
	Q1 2020	Q2 2020			
LGIM Global Equity	293.4	353.3	37.8%	40.0%	-2.2%
LGIM UK Equity	94.1	103.7	11.1%	5.0%	6.1%
Capital Dynamics Private Equity	49.1	50.3	5.4%	5.0%	0.4%
JP Morgan Emerging Markets	25.2	38.6	4.1%	5.0%	-0.9%
Total Growth	461.9	545.9	58.4%	55.0%	3.4%
LCIV Baillie Gifford Multi Asset	110.8	120.1	12.8%	10.0%	2.8%
LCIV Ruffer Multi Asset	50.1	53.3	5.7%	10.0%	-4.3%
Alinda Infrastructure	24.6	22.8	2.4%	0.0%	2.4%
Capital Dynamics Infrastructure	10.1	10.1	1.1%	0.0%	1.1%
Aviva Property	0.1	0.1	0.0%	0.0%	0.0%
London LGPS CIV Infrastructure	0.5	3.4	0.4%	10.0%	-9.6%
Total Income	196.3	209.7	22.4%	30.0%	-7.6%
CQS Multi Credit	30.6	38.5	4.1%	5.0%	-0.9%
BlackRock UK Gilts Over 15 yrs	92.6	96.2	10.3%	10.0%	0.3%
Total Protection	123.2	134.6	14.4%	15.0%	-0.6%
Cash	53.9	44.6	4.8%	0.0%	4.8%
Total Scheme	835.3	934.9	100.0%	100.0%	

Benchmark currently shown as the interim-target allocation as the first step in the journey towards the long-term target. As the Fund's allocations and commitments to private markets increase over time, we will move towards comparison against the long-term target.

Asset class exposures



Following the results of the Q1 2020 investment strategy review, the following target allocations were agreed:

Interim
Growth – 55%
Income/Diversifiers – 30%
Protection – 15%

Long-term
Growth – 50%
Income/Diversifiers – 35%
Protection – 15%

The Fund is currently overweight growth assets and underweight diversifiers.

It is also overweight cash although c£28m of cash (c3% of assets) will be invested in a low carbon passive equity fund. As agreed at the June meeting, the interim target allocations will be updated to reflect this increase in growth assets and this will be reflected in future reports.

Over the quarter, £8m has been invested in emerging market equities, and £4m has been invested in the CQS multi-asset credit fund. Both investments have taken the respective allocations closer to their interim targets.

Manager performance

	Last 3 months (%)			Last 12 months (%)			Last 3 years (% p.a.)		
	Fund	B'mark	Relative	Fund	B'mark	Relative	Fund	B'mark	Relative
Growth									
LGIM Global Equity	20.4	20.4	-0.0	7.7	7.7	-0.1	9.5	9.5	0.0
LGIM UK Equity	10.2	10.2	0.1	-12.9	-13.0	0.1	-1.5	-1.6	0.1
Capital Dynamics Private Equity	4.7	20.2	-12.9	8.5	5.6	2.7	14.6	7.2	6.9
JP Morgan Emerging Markets	21.2	18.5	2.3	-4.5	-0.5	-4.0			
Income									
LCIV Baillie Gifford Multi Asset	8.4	0.5	7.8	-2.2	2.8	-4.8	0.7	3.6	-2.8
LCIV Ruffer Multi Asset	6.4	0.5	5.8	8.1	2.8	5.1	2.7	3.7	-0.9
Alinda Infrastructure				5.6	3.2	2.4	-5.3	6.4	-11.0
Capital Dynamics Infrastructure				-10.3	3.2	-13.1	5.2	6.4	-1.1
Protection									
CQS Multi Credit	12.7	0.8	11.9	-4.6	3.4	-7.7			
BlackRock UK Gilts Over 15 yrs	3.9	3.9	0.0	19.8	19.7	0.1			
Total	11.6	9.5	1.9	3.1	3.4	-0.3	5.0	5.5	-0.5

Performance from Alinda and Capital Dynamics Infrastructure is based on information provided by Northern Trust. For such investments, there are more appropriate measures to assess performance. Furthermore, performance in respect of Alinda is skewed by the Alinda III fund which is in the relatively early stages. It is therefore difficult to judge performance from this mandate at this stage on a purely percentage basis. However, as the Fund's commitments continue to be drawn, and the size of investments increase, it will become more appropriate to consider return measures in percentage terms. More detail on relevant measures of assessment for infrastructure funds is provided in the individual manager pages. This is also the case for Private Equity as an asset class.

The table above also excludes the opening quarters performance of the Fund's investment in the London CIV's infrastructure sub-fund. Given initial draw downs only occurred during Q1 2020, it remains too early to report appropriate performance at this stage. Like the Alinda above, as the Fund's commitments continue to be drawn under this mandate, and the size of investments increase, it will become more appropriate to report and consider return measures in percentage terms. At this stage, we have also not included a separate manager page.

The total Fund return was positive during Q2 2020, on both an absolute and relative basis. Absolute 12-month performance has returned to positive territory.

Equity markets led the recovery, with global equities performing particularly strongly. This can be seen in the performance of LGIM's mandates: global returned 20.4% and UK 10.2%.

The Fund's DGF mandates produced strong positive returns over the quarter, with Baillie Gifford returning 8.4% and Ruffer 6.4%.

The economic stimulus provided by governments also boosted credit markets with spreads narrowing. The CQS mandate produced a return of 12.7% over the quarter recovering some of the ground lost during Q1. Performance over 12 months remains negative.

Gilts again delivered positive returns over the quarter and are now the strongest performing of the Fund's assets over the last 12 months.

There were no manager rating changes to existing managers over the quarter.

Manager ratings

Manager	Mandate	Hymans Rating
LGIM	Global Equity	Preferred
LGIM	UK Equity	Preferred
JP Morgan Emerging Markets	Emerging Markets (LCIV)	Suitable
Capital Dynamics	Private Equity	Suitable
LCIV Baillie Gifford	Multi Asset (LCIV)	Preferred - On-watch
LCIV Ruffer	Multi Asset (LCIV)	Positive
Alinda	Infrastructure	Not Rated
Capital Dynamics	Infrastructure	Not Rated
London LGPS CIV	Infrastructure	Not Rated
CQS	Multi Credit (LCIV)	Suitable
BlackRock	UK Gilts Over 15Yrs	Preferred

Baillie Gifford business update

Four Partners retired at Baillie Gifford over the quarter and seven new partners were appointed over the period. In addition, it was announced more recently that Charles Plowden, Baillie Gifford's Joint Managing Partner, will retire next year on 30 April 2021. Malcolm MacColl will replace Plowden as Joint Managing Partner on 1 May 2021. In relation to the Multi Asset Team, over the quarter, James Squires also formally became of the head of the team following Patrick Edwardson's retirement.

LGIM Global Equity

The LGIM global equity mandate returned 20.4% over the quarter.

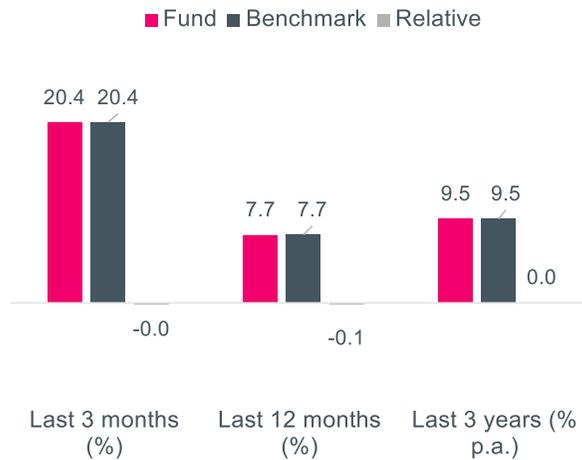
As a passively managed fund, it has matched its benchmark over all periods.

Global markets have fared better compared to the UK due to:

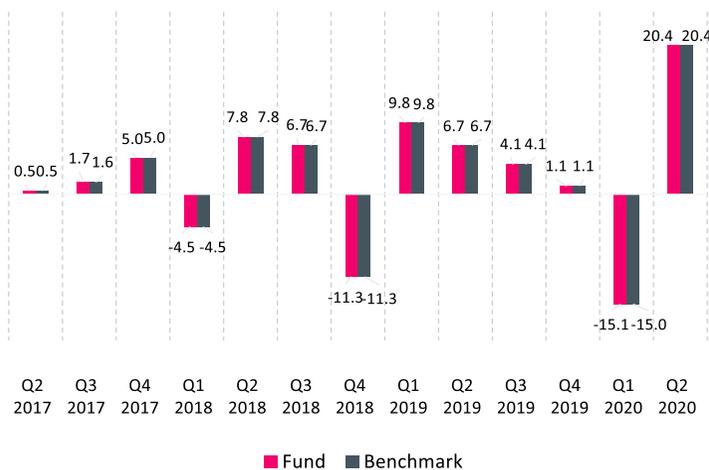
- Lower weighting to oil & gas and industrials
- Higher weightings to technology
- The continuing weakening of the Pound

We continue to rate LGIM's passive equity capabilities as 'Preferred'.

Fund Performance vs benchmark/target



Historical Performance/Benchmark



LGIM UK Equity

UK equity markets also responded to the unprecedented package of monetary and fiscal measures to stabilise the economy.

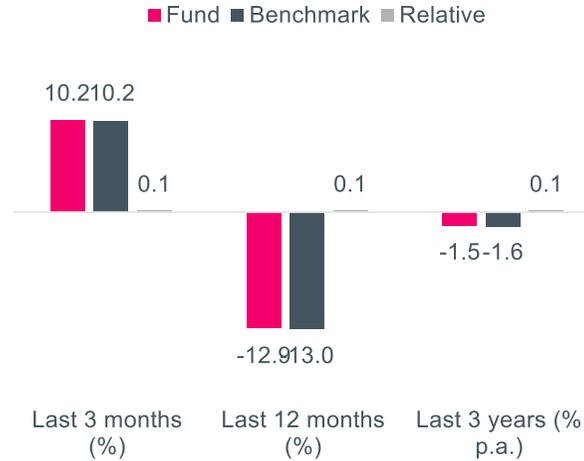
The LGIM UK equity mandate returned 10.2% in Q2 2020.

This was in line with its benchmark as we would expect for a passively managed portfolio.

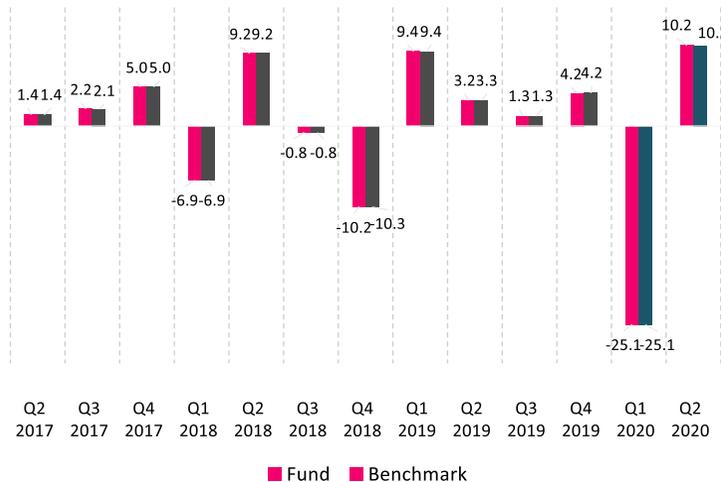
Despite this rebound, 12 month and 3 year performance remain in negative territory.

We continue to rate LGIM's passive equity capabilities as 'Preferred'.

Fund Performance vs benchmark/target



Historical Performance/Benchmark



JP Morgan Emerging Markets

In Q4 2019 the LCIV emerging markets fund transitioned from Janus Henderson to JP Morgan.

In its second full quarter under JP Morgan, the fund returned 21.2%, representing a significant rebound on the return of -17.5% during Q1.

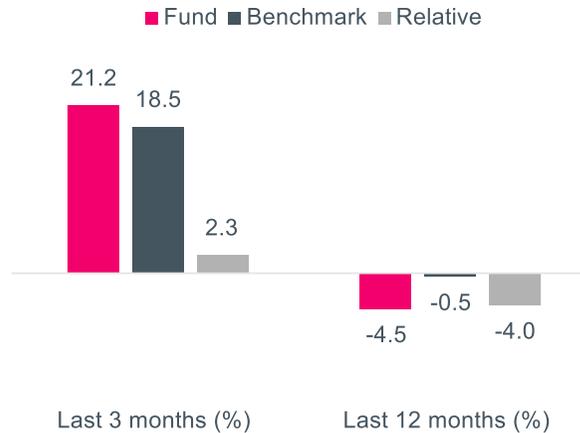
JP Morgan outperformed its MSCI Emerging Market benchmark over Q2.

Longer term underperformance is dominated by the previous LCIV manager for emerging markets, Janus Henderson.

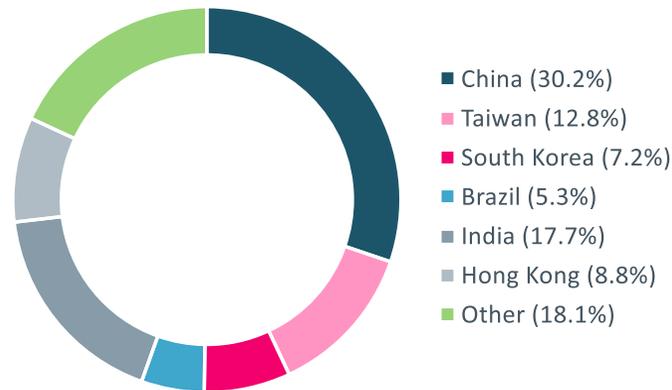
Over the quarter, the Fund utilised excess cash holdings to invest a further £8m into the JP Morgan mandate. This was part of a rebalancing review and served to take the actual allocation closer to the interim target of 5%.

We rate JP Morgan's Emerging Market equity fund as 'Suitable'.

Fund performance vs benchmark/target



Fund Regional Allocation



Capital Dynamics
Private Equity

The Capital Dynamics Private Equity fund is invested across a range of sub-funds offering good diversification.

Based on information provided by Northern Trust, the fund delivered a positive return over the quarter although it lagged its benchmark return. 3-year returns are ahead of benchmark.

In practice, there are two key metrics to assess performance for private equity investments; Internal Rate of Return (IRR) and the Total Value to Paid-In (TVPI) ratio.

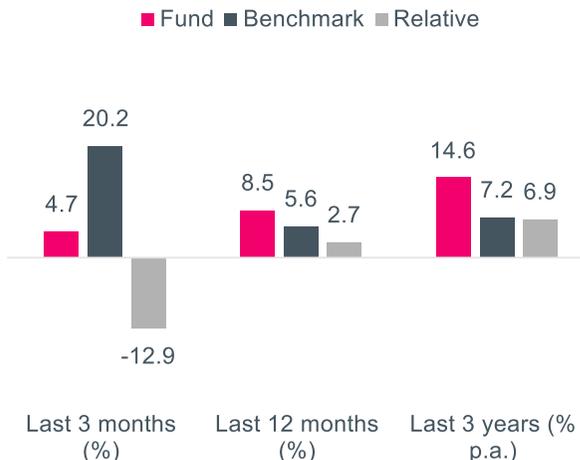
The investment is at a mature stage meaning assessing the IRR (a percentage value) alongside the TVPI carries greater weight. As at 31 March 2020 the IRR was approximately 10.9% with a TVPI of 1.53. This represents a healthy return to date for the Fund.

The following distributions occurred over Q2:

6 May 2020 – EUR 675,000
24 June 2020 – \$91,384

There were no capital calls during Q2.

Fund Performance



Summary as at 31 March 2020

Capital committed	£124.5m
Total contributed	c91.4%
IRR (approx.)	10.9%
TVPI	1.53x

Baillie Gifford Multi-asset

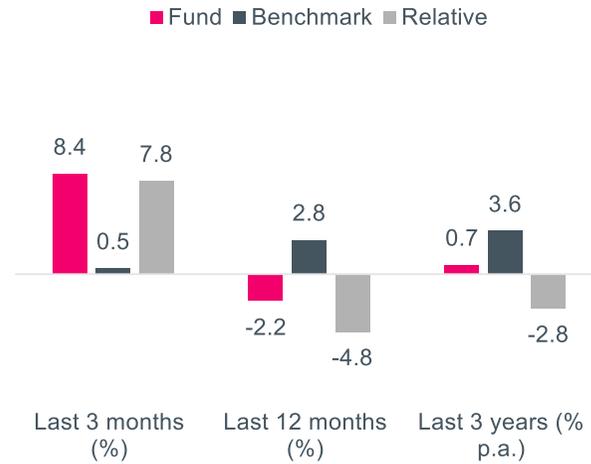
In Q2 2020 the Baillie Gifford multi-asset fund produced a return of 8.4%, well ahead of its benchmark return.

3-year performance is positive on an absolute basis although negative relative to benchmark.

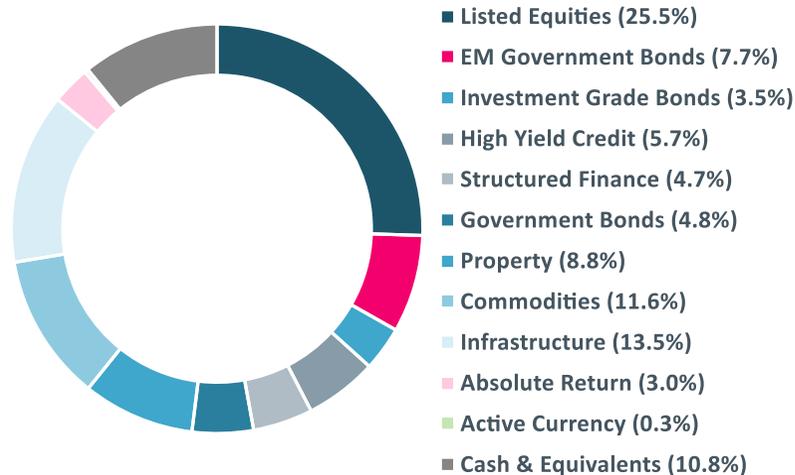
The general recovery in asset prices has benefitted most of the asset classes in which the fund is invested.

As confidence returned to market, Baillie Gifford invested a significant proportion of the cash held at the end of Q1, leading to increased allocations to listed equities, credit and infrastructure.

Fund Performance



Fund Asset Allocation



Ruffer Multi-asset

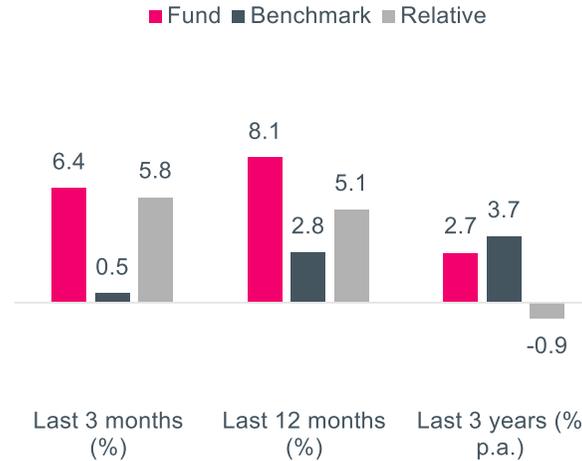
The Ruffer Multi-Asset fund returned 6.4% in absolute terms over the quarter, ahead of its benchmark.

It is the more defensively positioned of the two multi-asset mandates held by the Fund within the LCIV.

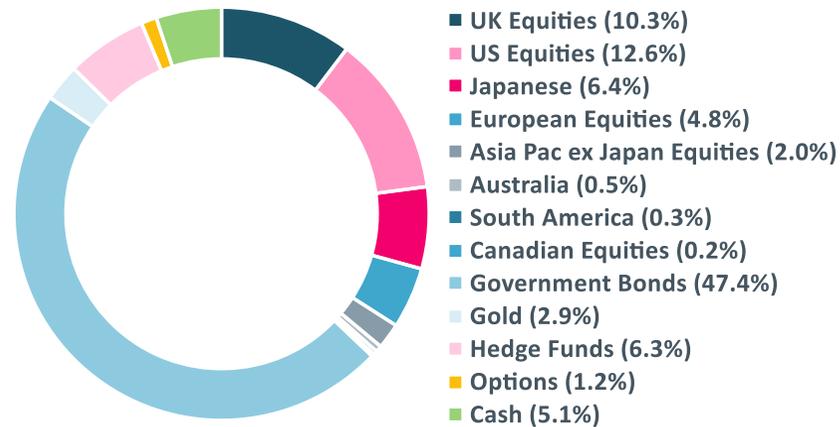
Ruffer maintained this more defensive position during Q2 by continuing its higher weighting to longer duration government bonds (c47%). Government bonds delivered positive performance during the quarter.

Ruffer also marginally increased its exposure to equities over Q2 and this provided a positive contribution to performance.

Fund Performance



Fund Asset Allocation



Alinda Infrastructure

Target: Absolute return of 8.0% p.a.

The two key metrics to assess performance for infrastructure investments are the Internal Rate of Return (IRR) and the Total Value to Paid-In (TVPI) ratio.

At the beginning it is too early to assess performance on a purely percentage basis. TVPI is more informative. This essentially seeks to outline what the Fund has achieved (its return) so far as a multiple of the deployed capital to date.

The Alinda III Infrastructure fund is in the ramp-up stage, drawing down and deploying capital which is skewing and adding volatility to the combined percentage return.

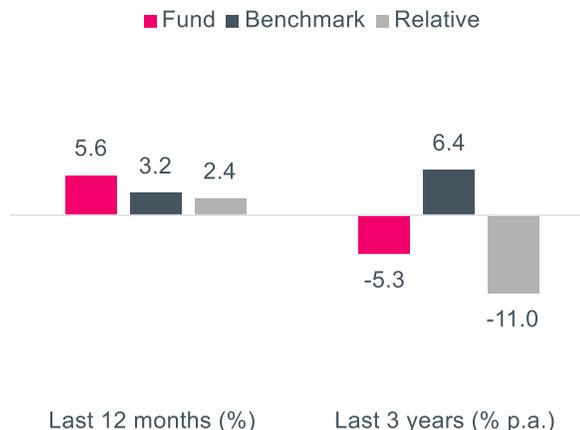
Remaining capital commitments as at 30 June 2020 are as follows:

Alinda II: \$3,646,739
Alinda III: \$13,527,095

The following net distributions (distributions less contributions) were made over Q2:

Alinda II: \$nil
Alinda III: \$1,431,653

Fund performance vs benchmark/target



Summary as at 30 June 2020

	Alinda Fund II	Alinda Fund III
IRR (Gross)	5.8%	19.4%
IRR (Net)	3.2%	11.0%
Cash yield	7.0%	9.2%
DPI	1.1x	0.5x
TVPI (Net)	1.2x	1.2x

Capital Dynamics Infrastructure

Target: Absolute return of 8.0% p.a.

The Fund's holdings are currently solely held within the Capital Dynamics Clean Energy and Infrastructure fund.

The two key metrics to assess performance for infrastructure investments are the Internal Rate of Return (IRR) and the Total Value to Paid-In (TVPI) ratio.

With the fund having deployed most of the capital commitment it is appropriate to assess performance on both measures.

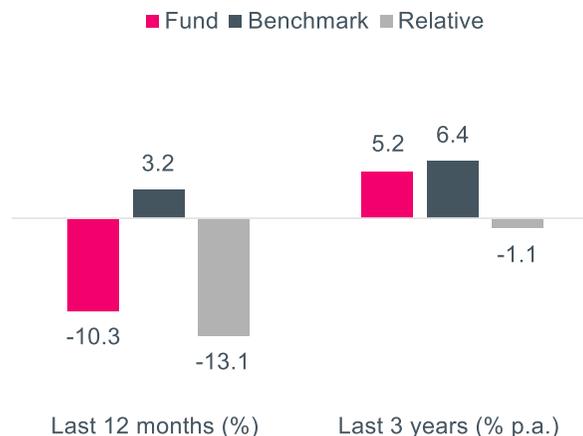
Reporting on underlying commitments is as at 31 March 2020 due to the lag in reporting from the manager, which is typical for funds of this nature.

As can be seen by both the IRR and TVPI, performance has been lower than expected to date.

In terms of activity over Q1 2020:

Distributions = \$0m
Capital calls = \$0m

Fund performance vs benchmark/target



Summary as at 31 March 2020 (figures in \$m where applicable)

Capital committed	\$15.0	Net IRR since inception	(1.2%)
Total contributed	\$14.7	Total value-to-paid-in-ratio (TVPI)	0.93x
Distributions	\$0.2		
Value created	(\$0.8)		
Net asset value	\$13.7		

CQS Multi Credit

Over the second quarter of 2020 CQS's multi-asset credit strategy returned 12.7%.

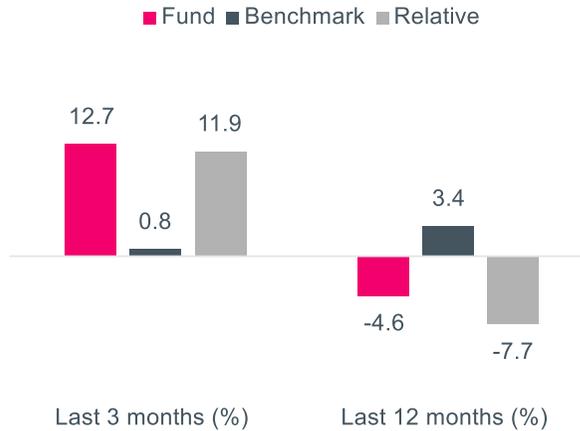
This was not enough to offset the return of -17% for Q1 and the 12 month performance continues to be behind benchmark.

During Q1, CQS adjusted the portfolio in response to the changing landscape. Leisure and travel related exposure was sold down in favour of more defensive industries like utilities and consumer non-discretionary goods, to reduce the likelihood of defaults within the portfolio. CQS also took the opportunity to invest in higher quality companies to offer better protection should the crisis be more prolonged and hard felt.

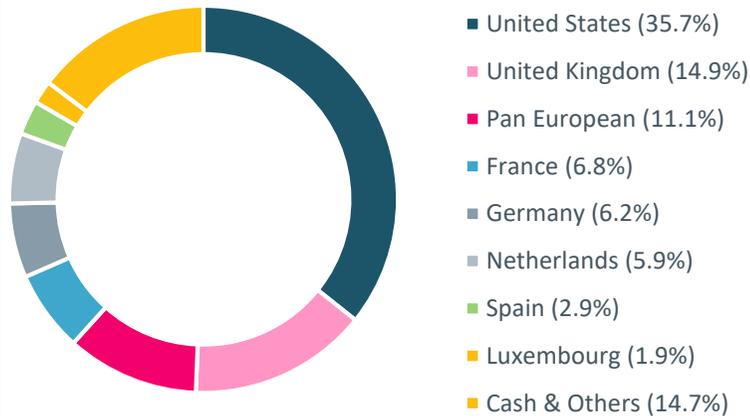
The economic stimulus provided by governments, including bond purchase programmes, resulted in a narrowing of credit spreads during Q2, boosting valuations and resulting in the positive performance seen during Q2.

Over the quarter, the Fund utilised excess cash holdings to invest a further £4m into the LCIV MAC mandate. This was part of a rebalancing review and served to take the actual allocation closer to the interim target of 5%.

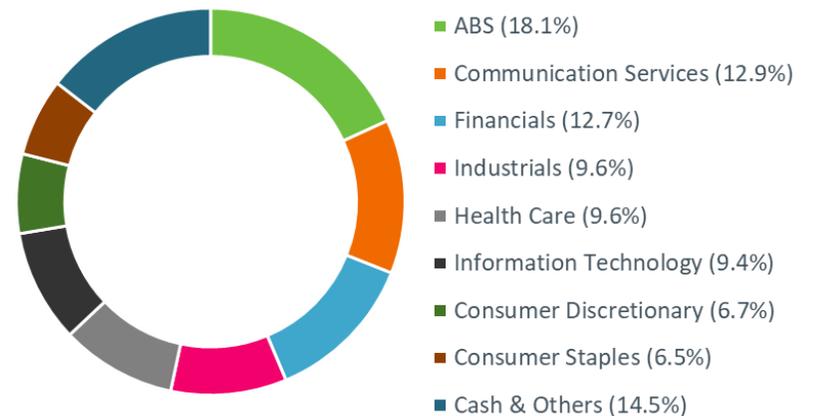
Fund performance vs benchmark/target



Country Weights



Sector Weights



Source: Investment Manager

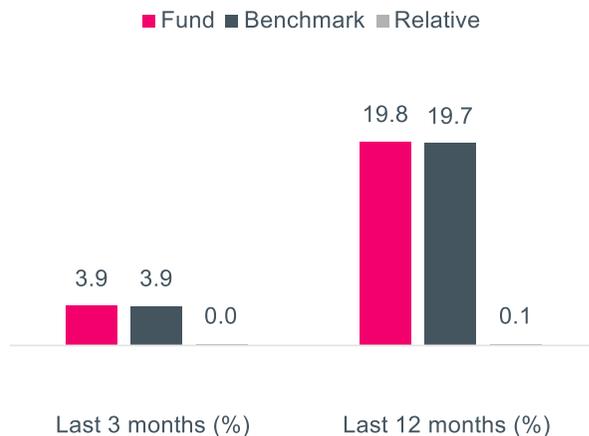
BlackRock UK gilts

BlackRock were appointed in March 2019 to oversee the Fund's bond allocation.

It is a passively managed mandate aimed at matching the FTSE UK Gilts Over 15 Yrs index.

Over the second quarter of 2020 the fund returned 3.9%.

Fund performance vs benchmark/target



Q1 figures confirmed GDP had fallen across the world since the end of 2019. As many of the developed economies went into lockdown during March, falls in second-quarter GDP are likely to be even greater. Purchasing Managers' Indices for both services and manufacturing in the major western economies plunged to record lows in April but, after rebounding in May, saw record rises in June. Though remaining at a level consistent with further economic contraction since May, most commentators suggested the sharp rise from May's numbers provided a better guide to the likely growth in output over the month.

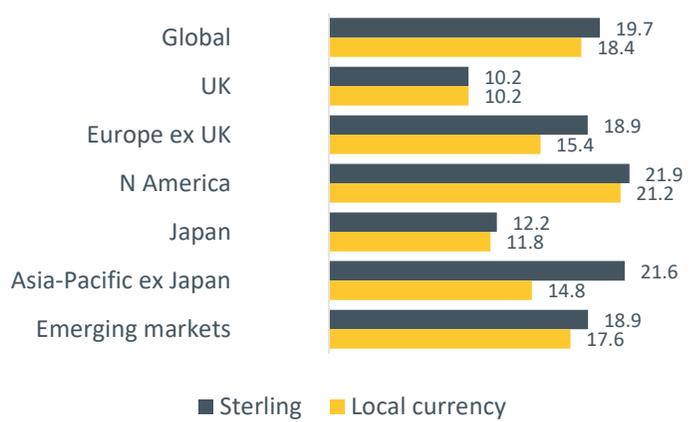
Forecasts for global GDP growth in 2020 as a whole have fallen significantly since the end of the first quarter. However, there has been some moderation in the pace of downgrades to global 2020 GDP data, with some country-level exceptions. UK CPI inflation fell from 1.5% in March to 0.5% in May. Lower energy prices made a big contribution to the fall but core inflation (excluding food and energy) has also fallen from 1.6% to 1.2%, as low as it has been since 2016.

In April, the Fed significantly expanded the corporate credit purchase programmes it had announced in March to include, for the first time, speculative-grade debt. In June, the European Central Bank announced a further €600bn of QE and the Bank of England raised its QE programme from £645bn to £745bn. Sterling consolidated the rebound from its late-March depths in April, but subsequently weakened. In trade-weighted terms, it has fallen more than 2% since the end of March.

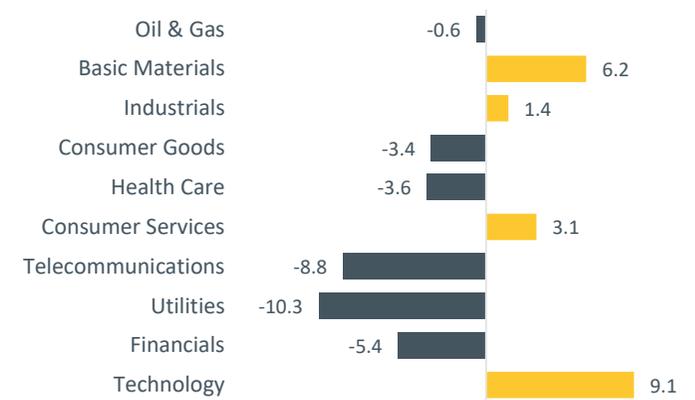
Historic returns for world markets [1]



Regional equity returns [2]



Global equity sector returns (%) [3]



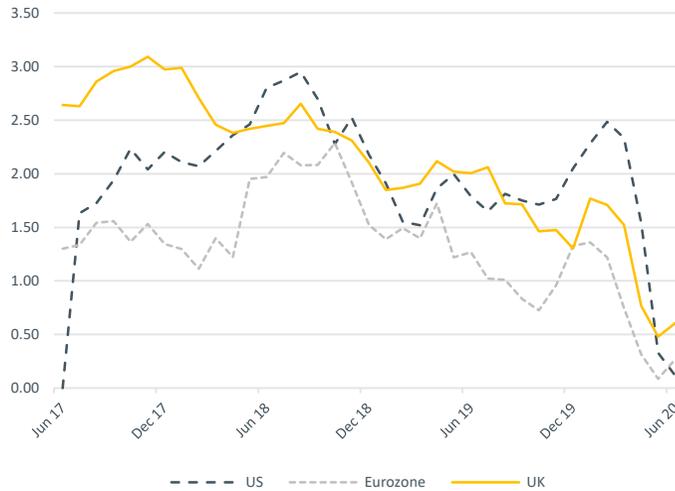
[1] All returns are in Sterling terms. Indices shown (from left to right) are as follows: FTSE All Share, FTSE AW Developed Europe ex-UK, FTSE North America, FTSE Japan, FTSE AW Developed Asia Pacific ex-Japan, FTSE Emerging, FTSE Fixed Gilts All Stocks, FTSE Index-Linked Gilts All Maturities, iBoxx Corporates All Investment Grade All Maturities, JP Morgan GBI Overseas Bonds, MSCI UK Monthly Property Index; UK Interbank 7 Day. [2] FTSE All World Indices [3] Relative to FTSE All World Indices.

Sovereign bond yields changed little in the US and Germany, but UK 10-year gilts have fallen a further 0.2%. Index-linked gilt yields have fallen further than conventional gilt yields, resulting in a slight rise in implied inflation. Reflecting the expansion of central bank support, global investment-grade spreads fell from 2.8% p.a. to 1.6% p.a. Global speculative-grade credit spreads fell from 9.2% p.a. to 6.4% p.a., further supported by the specific details of the Fed's purchases and a rise in oil prices from \$22 to \$41 per barrel. Energy companies comprise c.10% of the US high yield market.

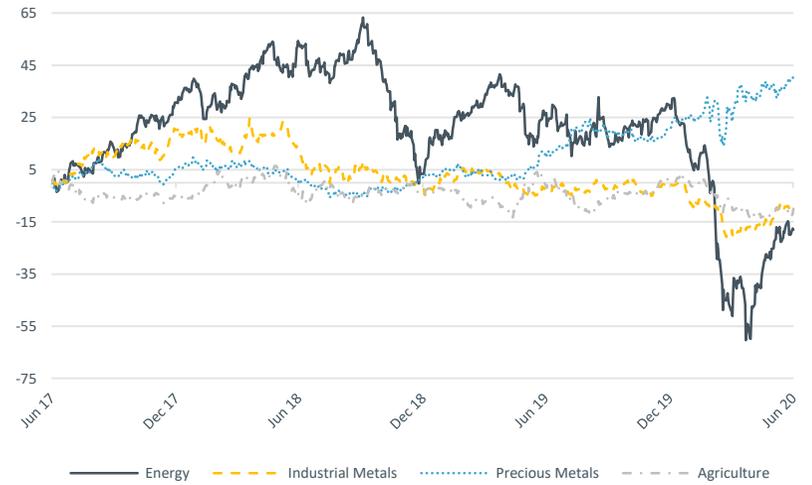
Global equity indices rose 18.4% in local currency terms. Sector composition helps to explain why the US (heavy in technology) leads the regional ranking tables for both this quarter and the year to date and why the UK (hardly any technology and heavy in financials) brings up the rear over both periods. After a poor first quarter, cyclical sectors have fared better in the second: basic materials, industrials and consumer services have outperformed the market; oil & gas has been broadly in line. But financials have fallen further behind. Technology is again at the head of the global performance rankings and, after a relatively resilient first quarter, defensive sectors, such as utilities, telecoms and healthcare, have lagged.

UK commercial property values continue to fall, although there is little or no transaction activity to guide valuations. As measured by the MSCI UK Monthly Property Index, capital values in May were almost 6% below end-2019 levels. Initial evidence suggests commercial tenants withheld rents at the June quarter collection day in England & Wales to a greater extent than in March.

Annual CPI Inflation (% p.a.)



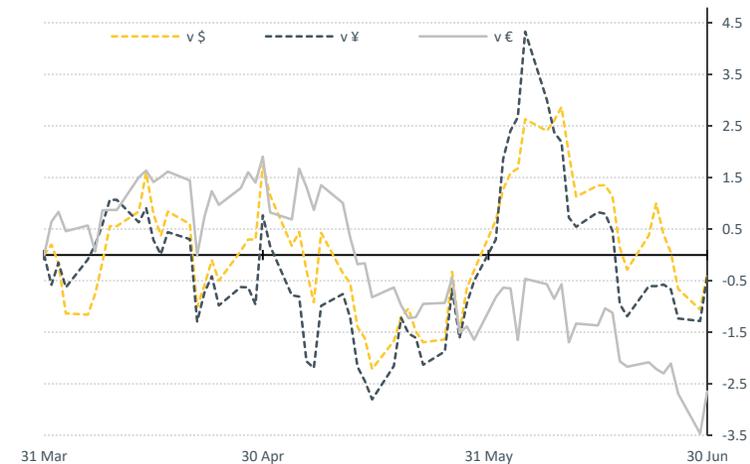
Commodity Prices (% change)



Gilt yields chart (% p.a.)



Sterling trend chart (% change)



Source: Reuters

Hymans Rating

Preferred	Our highest rated managers in each asset class. These should be the strategies we are willing to put forward for new searches.
Positive	We believe there is a strong chance that the strategy will achieve its objectives, but there is some element that holds us back from providing the product with the highest rating.
Suitable	We believe the strategy is suitable for pension scheme investors. We have done sufficient due diligence to assess its compliance with the requirements of pension scheme investors but do not have a strong view on the investment capability. The strategy would not be put forward for new searches based on investment merits alone.
Negative	The strategy is not suitable for continued or future investment and alternatives should be explored.
Not Rated	Insufficient knowledge or due diligence to be able to form an opinion.

Responsible Investment

Strong	Strong evidence of good RI practices across all criteria and practices are consistently applied.
Good	Reasonable evidence of good RI practices across all criteria and practices are consistently applied.
Adequate	Some evidence of good RI practices but practices may not be evident across all criteria or applied inconsistently.
Weak	Little to no evidence of good RI practices.
Not Rated	Insufficient knowledge to be able to form an opinion on.

Risk Warning

Please note the value of investments, and income from them, may fall as well as rise. This includes equities, government or corporate bonds, and property, whether held directly or in a pooled or collective investment vehicle. Further, investment in developing or emerging markets may be more volatile and less marketable than in mature markets. Exchange rates may also affect the value of an investment. As a result, an investor may not get back the amount originally invested. Past performance is not necessarily a guide to future performance.

In some cases, we have commercial business arrangements/agreements with clients within the financial sector where we provide services. These services are entirely separate from any advice that we may provide in recommending products to our advisory clients. Our recommendations are provided as a result of clients' needs and based upon our independent research. Where there is a perceived or potential conflict, alternative recommendations can be made available.

Hymans Robertson LLP has relied upon third party sources and all copyright and other rights are reserved by such third party sources as follows: DataStream data: © DataStream; Fund Manager data: Fund Manager; Morgan Stanley Capital International data: © and database right Morgan Stanley Capital International and its licensors 2018. All rights reserved. MSCI has no liability to any person for any losses, damages, costs or expenses suffered as a result of any use or reliance on any of the information which may be attributed to it; Hymans Robertson data: © Hymans Robertson. Whilst every effort has been made to ensure the accuracy of such estimates or data - including third party data - we cannot accept responsibility for any loss arising from their use. © Hymans Robertson LLP 2019.

Geometric v Arithmetic Performance

Hymans Robertson are among the investment professionals who calculate relative performance geometrically as follows:

$$\frac{(1 + \text{Fund Performance})}{(1 + \text{Benchmark Performance})} - 1$$

Some industry practitioners use the simpler arithmetic method as follows:

$$\text{Fund Performance} - \text{Benchmark Performance}$$

The geometric return is a better measure of investment performance when compared to the arithmetic return, to account for potential volatility of returns.

The difference between the arithmetic mean return and the geometric mean return increases as the volatility increases.

This page is intentionally left blank

	<p align="center">Pensions Fund Sub-Committee 6 October 2020</p>
	<p align="center">Report from the Director of Finance</p>
<p>Investment strategy: Transition Roadmap</p>	

Wards Affected:	ALL
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	Two 1. Investment strategy: Transition Roadmap 2. Rebalancing Options
Background Papers:	<ul style="list-style-type: none"> ▪ Review of Investment Strategy - 25 February 2020
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Minesh Patel, Director of Finance Ravinder Jassar, Head of Finance Sawan Shah, Senior Finance Analyst Saagar Raithatha, Finance Analyst

1.0 Purpose of the Report

1.1 The purpose of this report is to detail the investment strategy transition roadmap prepared by the Fund's investment advisors, Hymans Robertson.

2.0 Recommendation(s)

2.1 The Committee is asked to:

- As agreed during the investment strategy review in February 2020, in line with Brent's long term asset allocation strategy, to note the position to reduce the allocation of UK equities to the interim target allocation of 5% by selling down LGIM's UK equity holding in two steps, each of 3%.
- Note the two steps to reinvest the proceeds from LGIM's UK equity holding, each of 3%, into Ruffer and LGIM global equity moving towards the interim target allocation of 10% and 43% respectively.
- Note the overall report.

3.0 Detail

3.1 In February 2020, the Committee agreed to the investment strategy review undertaken by the Fund's investment advisors, Hymans Robertson.

3.2 In summary, the investment strategy review considered:

- An expansion of the committee's Responsible Investment beliefs in light of the increased focus on, and importance of, this area;
- The current long term strategy is fit for purpose from a returns perspective as it is expected to return in excess of the required return;
- A 5% increase in the long term allocation to equities, and a 5% allocation to private debt, both funded from "diversifiers";
- To introduce a global low carbon mandate as part of the Fund's equity allocation;
- A degree of rebalancing takes place on a regular basis to try and prevent too much deviation from the desired strategic allocation.

3.3 The following paragraphs, together with the details set out in Appendix 1, summarise the actions being taken to move the investment strategy towards the strategic target allocations agreed in February 2020.

3.4 It is acknowledged that transitioning to the targets agreed in February will be fluid in practice and will depend on numerous factors including market conditions and the attractiveness of investment opportunities in the relevant asset classes.

3.5 As at 31 August 2020, the following allocations are currently held.

- Global equities are 4.2% underweight.
- UK equities are 5.9% overweight.
- Imbalance between Baillie Gifford and Ruffer – current allocations are 13.3% and 5.7% respectively.

3.6 Appendix 2 sets out how the Fund will rebalance its positions to achieve the agreed strategic target allocations.

3.7 As summarised in the appendix, UK equities have underperformed their global counterparts in recent times. Although there is a chance the UK may experience a recovery in relative performance, transitioning to its weighting as currently targeted (to 5%) will further diversify the Fund's equity exposure based the current expected benefits. Furthermore, the remaining UK equity allocation of 5% would still benefit should there be a domestic market recovery.

3.8 Once the Fund has reached its interim target allocation of 5%, UK equities will still represent c10% of the Fund's total listed equities. A future consideration for Officers and Sub-Committee members therefore can be whether the long-term allocation to UK equities should be revisited, possibly looking to bring the Fund's exposure to UK equities more into line with the UK's share of the global equity market.

- 3.9 However, initially the focus is on the current imbalance within the Fund's asset allocation. In transitioning to the agreed strategic target allocations, the 5% interim target allocation of UK equities is to be reached by selling down LGIM's UK equity holding in two steps, each of 3%.
- Reinvest 3% in LGIM global equity.
 - Reinvest 3% in Ruffer.
- 3.10 Investment of 3% into LGIM global equity will bring the Fund closer to its interim target allocation of 43% for global equities.
- 3.11 The Fund's multi-asset funds (Baillie Gifford and Ruffer) had contrasting fortunes during Q1, with the more defensively positioned Ruffer fund performing better during the initial market downturn. At 31 August 2020, the Fund held £125m with Baillie Gifford and £54m with Ruffer. Page 7 of Appendix 2 also considers the balance between Baillie Gifford and Ruffer, acknowledging the different investment styles.
- 3.12 The Fund's interim target allocation is to invest 10% each in Baillie Gifford and Ruffer. At end of August 2020, the actual allocations were 13.3% and 5.7% respectively. However, in addressing the split between these two mandates through some form of rebalancing, the most cost-effective transition is to disinvest 3% from UK equities for the reasons set out in the appendix and invest the proceeds with Ruffer. This would take the allocations to 13.3% for Baillie Gifford and 8.7% for Ruffer. Therefore the Fund would be more closely aligned to the interim target split of 10% each. As the Fund's allocation to private markets and property build up over time, it will be necessary to monitor these multi-asset allocations and act accordingly in order to not only maintain an appropriate split but manage the gradual reduction in allocation to a combined 5%, the agreed current long-term target.
- 3.13 In addition to this, the Committee also approved an initial investment of c£28m into the BlackRock passive low carbon equity fund on 16 July 2020. This investment is set to be made in 2 stages. Brent officers are in the process of liaising with Blackrock and the Fund's custodian, completing the necessary paperwork and investment will now be made as soon as possible.

4.0 Financial Implications

- 4.1 These are discussed throughout the report and further set out in Appendix 2.

5.0 Legal Implications

- 5.1 Not applicable.

6.0 Equality Implications

- 6.1 Not applicable.

7.0 Consultation with Ward Members and Stakeholders

7.1 Not applicable.

8.0 Human Resources

8.1 Not applicable.

Report sign off:

Minesh Patel
Director of Finance

Investment strategy: transition roadmap (June 2020)

Introduction

This paper is addressed to the Pension Fund Sub-Committee (the “Committee”) of the London Borough of Brent Pension Fund (the “Fund”). Its purpose is to summarise the actions being taken to move the investment strategy towards the strategic target allocations agreed in February 2020. Transitioning to the interim and long-term targets in practice will be fluid and will depend on numerous factors including market conditions and the attractiveness of investment opportunities in the relevant asset classes. However, as a guide, we would expect the Fund to move towards the interim target over the next 12-24 months (so by mid-2022) and towards the long-term target over the next 3-5 years (so by 2025). We understand the Fund remains in a positive cashflow position following the conclusion of the 2019 valuation and new contribution rates coming into force on 1 April 2020. The cashflow position will be monitored at regular intervals. To date we are not aware of any requests for contribution deferrals.

Key points/actions are as follows:

- **Low carbon equities:** subject to approval by the Committee, invest £25m to £30m (c3% of Fund assets) in a passive low carbon equity fund. Build further exposure to low carbon/sustainable oriented equities over time, partially using proceeds from reducing exposure to UK equities.
- **Increase interim allocations to equity and cash as a proxy for future infrastructure investments, until the agreed infrastructure allocation is built up:** investing £25m to £30m will take listed equity allocation c3% above the previously outlined interim target. We recommend this 3% overweight position is maintained alongside a 2% holding in cash while the Fund builds its investment in infrastructure. This is on the basis that a 5% allocation to equities/cash is expected to deliver a similar long-term risk/return profile to 5% in diversifiers.
- **Build infrastructure investment over time:** the Fund has undrawn commitments of c£50m to the LCIV infrastructure fund and c£12m to Alinda (total 7% of Fund assets) so exposure to infrastructure will increase naturally. Balancing this, Alinda (II), Alinda (III) and Capital Dynamics will run off over time (2, 6 and 2 years respectively). Proceeds from Alinda/Capital Dynamics and equity/cash holding can be invested in LCIV’s Infrastructure Fund or other suitable alternatives e.g. LCIV’s new Renewables Fund which has ESG benefits (subject to due diligence on the funds to ensure they meet the Committee’s beliefs/objectives).
- **Baillie Gifford and Ruffer:** Consider appropriate balance between these managers, acknowledging different styles.
- **Cash holding:** the Fund held c£54m of cash at 31 March 2020. £12m being used to increase the Fund’s emerging markets equities (£8m) and multi-asset credit (£4m) holdings plus there is a proposal to invest £25m to £30m in a passive low carbon equity fund. As explained above, we recommend a cash balance of £15m to £20m is maintained while the Fund builds its investment in infrastructure.

This paper should not be released or otherwise disclosed to any third party except with our prior written consent, in which case it should be released in its entirety. We accept no liability to any party unless we have expressly accepted such liability in writing.

Summary – current and target allocations

Asset class	31 March 2020 value (£m)	31 March 2020 allocation (%)	Interim target allocation (%)	Long-term target allocation (%)	Comments
Total growth	461.8	55.3	58	50	Focus is to introduce low carbon equity fund, seeded by c£25-30m of cash (approx. 3% of assets). Will take allocation 3% above the previously outlined interim target.
Total diversifiers	196.2	23.5	25	35	Will take time to for initial commitment to infrastructure to be drawn. Meantime increased interim positions in equities (+3%) and cash (+2%) expected to deliver similar risk/return to 5% invested in diversifiers. Unwind equity/cash position as infrastructure investment increases.
Total protection	123.2	14.8	15	15	In line with interim target allocation.
Cash	53.9	6.5	2	-	£12m being used to increase emerging markets equities (£8m) and multi-asset credit (£4m) holdings Proposal to invest c£25-30m (c3% of assets) in low carbon equity fund Retain remainder in cash, partly as part of the infrastructure proxy and partly to reflect current market uncertainty
Total	835.1	100.0	100	100	

Growth assets

Asset class	Style	Manager	31 March 2020 value (£m)	31 March 2020 allocation (%)	Interim target allocation (%)	Long-term target allocation (%)	Comments
Equities	Global passive	LGIM	293.4	35.1			Proposal to establish low carbon equity holding, seeded by c£25-30m of cash (c3% of assets).
	Global low carbon	Discussed in a separate paper	-	-			43
	UK passive	LGIM	94.1	11.3	5	5	Increase exposure to low carbon equities over time. Options are to build investment in BlackRock low carbon fund and/or diversify by manager/style via London CIV offerings or suitable alternative.
	EM active	JP Morgan (LCIV)	25.2	3.0	5	5	Prepare plan to reduce UK exposure over time. Rebalancing towards global equities could be time-based and/or based on relative market movements.
Private Equity	Fund of funds	Capital Dynamics	49.1	5.9	5	0	Investing c£8m of cash to increase allocation to c4%.
Total growth			461.8	55.3	58	50	Long-term target allocation is 0%. Prepare plan to reduce exposure over the longer term and reallocate to diversifiers.

Diversifiers

Asset class	Style	Manager	31 March 2020 value (£m)	31 March 2020 allocation (%)	Interim target allocation (%)	Long-term target allocation (%)	Comments
Div Growth	Multi-asset	Baillie Gifford (LCIV)	110.8	13.3	20	5	Consider balance between BG and Ruffer, acknowledging different styles. Longer term plan to reduce exposure to 5%.
Abs Return	Multi-asset	Ruffer (LCIV)	50.1	6.0			
Infrastructure	Direct	Alinda	24.6	2.9	5	15	Undrawn commitments of c£50m to the LCIV infrastructure fund, c£12m to Alinda (total 7% of assets) so exposure will increase. Balancing this, Alinda and Capital Dynamics to run off over time (6 and 2 years respectively). Proceeds could be reinvested in LCIV funds, including new renewables fund which has ESG benefits. Carry out due diligence on LCIV renewables fund to ensure meets Brent beliefs/objectives. Initially work to interim target then increase this as additional commitments are made to the asset class.
	Funds+ Direct	Capital Dynamics	10.1	1.2			
		LCIV		0.5			
Property	UK and potentially some global	Aviva (current holding a Europe fund of funds)	0.1	-	-	10	Consider options to access property market, including LCIV, as part of a longer term plan. Outside of LCIV options are one or more core balanced funds and supplement this with allocations to other parts of the market such as secure income (long lease), UK residential and/or global property. Would involve reassessing current strategic 10% allocation to 'UK Core'.
Private debt	-	-	-	-	-	5	No immediate action.
Total diversifiers			196.2	23.5	25	35	

Protection assets

Asset class	Style	Manager	31 March 2020 value (£m)	31 March 2020 allocation (%)	Interim target allocation (%)	Long-term target allocation (%)	Comments
Multi-asset credit	Active credit focused	CQS	30.6	3.7	5	5	Investing c£4m of cash to increase holding to c4.2% Worth noting the CQS mandate, through its credit exposure provides diversification benefits, rather than any protection of capital.
Gilts	Passive duration	BlackRock	92.6	11.1	10	10	Fixed interest gilts. No immediate action.
Cash		Fund	53.9	6.5	2	0	As part of the infrastructure proxy.
Total protection			177.1	21.3	17	15	

Page 143

Prepared by:-

William Marshall, Partner

Kenneth Taylor, Associate Investment Consultant

Kameel Kapitan, Associate Investment Consultant

For and on behalf of Hymans Robertson LLP

June 2020

General Risk Warning

Please note the value of investments, and income from them, may fall as well as rise. This includes equities, government or corporate bonds, and property, whether held directly or in a pooled or collective investment vehicle. Further, investments in developing or emerging markets may be more volatile and less marketable than in mature markets. Exchange rates may also affect the value of an overseas investment. As a result, an investor may not get back the amount originally invested. Past performance is not necessarily a guide to future performance.

This page is intentionally left blank

Rebalancing options

Introduction

This paper is addressed to the Officers of the London Borough of Brent Pension Fund (“the Fund”) and has been prepared to set out options that could be considered to address two particular areas of the investment strategy:

1. The current split of the passive equity mandates between UK and Global (ex UK)
2. The split between the two multi-asset funds within the London CIV (Baillie Gifford and Ruffer)

Background and beliefs

The Fund adopts a diversified approach to investing in order to meet its long term funding objectives and carries out regular reviews to ensure the Fund remains on track. The last review was carried out in February 2020 when the Sub-Committee ratified the revised interim and long-term strategic target allocations. The interim allocation was subsequently refined in June 2020.

Integral to setting this long-term strategy is the Fund’s investment beliefs. They also play a role in monitoring the asset allocation and taking appropriate action to transition towards target. The Fund’s beliefs specific to the areas considered in this paper are:

- *Strategic asset allocation is a key determinant of risk and return, and thus typically more important than manager or stock selection*
- *Rebalancing policies are important*
- *Fees and transaction costs matter*

What these beliefs draw out is that investment strategy (the allocation between growth (equities), diversifiers, and protection assets) is the key driver of investment outcomes. Structural decisions (what makes up each of the aforementioned buckets) do not have as significant an impact, but they do still matter. Additionally, when undertaking any transition or rebalancing, it is advisable to seek the most cost efficient route of implementation as transaction costs are essentially a tax on returns.

With these principles in mind, the table in appendix 1 highlights the Fund is broadly in line with the interim strategic allocation but that structural imbalances prevail. The rest of the paper therefore covers how these imbalances can be addressed and whether further structural changes could be considered within the equity portfolio itself.

Rebalancing priorities

From a structural perspective the table in appendix 1 highlights the following:

1. Global equities are 4.2% underweight
2. UK equities are 5.9% overweight
3. Imbalance between Baillie Gifford and Ruffer – current allocations are 13.3% and 5.7% respectively

The global equity allocation will be increased by 3% once the initial investment in BlackRock’s low carbon fund has been completed. This suggests the priority rebalancing actions are to reduce exposure to UK equities and adjust the allocations to Baillie Gifford and Ruffer.

UK equities

Points to note:

- In the early 2000s, UK equities represented c10% of the global equity market. Today this stands at c4% and the reduction can be attributed in part to sector composition of the UK market and the depreciation of Sterling. Further details are set out in appendix 2.
- As summarised in appendix 2, UK equities have underperformed their global counterparts in recent times. Although there is a chance the UK may experience a recovery in relative performance, we remain comfortable with reducing its weighting as currently targeted (to 5%) on the basis of the expected benefits of further diversifying the Fund's equity exposure. Furthermore, the remaining UK equity allocation of 5% would still benefit should there be a domestic market recovery.
- Once the Fund has reached its interim target allocation of 5%, UK equities will still represent c10% of the Fund's total listed equities. A future consideration for Officers and Sub-Committee members therefore can be whether the long-term allocation to UK equities should be revisited, possibly looking to bring the Fund's exposure to UK equities more into line with the UK's share of the global equity market.
- The Sub-Committee could, if they feel appropriate, rationalise the Fund's equity holdings by disinvesting from the LGIM UK equity fund completely and investing all of the equity holdings in passive global equity instead.
- However, initially the focus is on the current imbalance relative to target. We therefore propose reducing the allocation to UK equities to the interim target allocation of 5% by selling down LGIM's UK equity holding in two steps, each of 3%, and reinvesting the proceeds as follows:
 1. Reinvest 3% in Ruffer for the reasons set out in the next section
 2. Reinvest 3% in LGIM global equity

We would be happy to discuss the timing of these transactions with you.

Baillie Gifford and Ruffer

Points to note:

- Both funds have a target return of Cash + 3.5% p.a. and aim to deliver equity-like performance but with lower volatility by capturing returns when the markets are rising and protecting capital when markets are falling.
- The managers have different styles with Baillie Gifford regarded as more of a directional fund (i.e. it tends to follow the direction of broader markets) and Ruffer having more of a focus on capital preservation (i.e. Ruffer may not perform as well as Baillie Gifford in a rising market but may fare better in a falling market). Having such complementary styles offers an added element of diversification and suggests an equitable split between the mandates may prove beneficial over the longer term.
- The first 2 quarters of 2020 provided an illustration of these complementary styles. Baillie Gifford delivered returns of -14.0% in Q1 and of +8.4% in Q2 while Ruffer delivered returns of -2.3% in Q1 and +6.4% in Q2.
- As with equity investing, investment in multi-asset funds should be considered over appropriate timeframes. It is therefore informative to look at the performance of these funds over longer periods, including past performance from the equivalent versions of the Baillie Gifford and Ruffer funds that were in place before pooling. Appendix 3 illustrates this past performance.

- The Fund's interim target allocation is to have 10% each in Baillie Gifford and Ruffer. At end of August 2020, the actual allocations were 13.3% and 5.7% respectively. Therefore, we believe there is scope to redress the split between these two mandates through some form of rebalancing.
- One option is to disinvest c3% from Baillie Gifford and reinvest the proceeds in Ruffer. However, we believe a more cost-effective option is to disinvest 3% from UK equities (for the reasons set out on the previous page) and invest the proceeds with Ruffer.
- This would take the allocations to 13.3% and 8.7% respectively, more closely aligned to the interim target split of 10% each. As the Fund's allocations to private markets and property build up over time it will be necessary to monitor these multi-asset allocations and act accordingly in order to not only maintain an appropriate split but manage the gradual reduction in allocation to a combined 5%, the agreed current long-term target.

Prepared by:-

William Marshall, Partner
Kameel Kapitan, Associate Investment Consultant
Kenneth Taylor, Associate Investment Consultant
22 September 2020

For and on behalf of Hymans Robertson LLP

General Risk Warning

Please note the value of investments, and income from them, may fall as well as rise. This includes equities, government or corporate bonds, and property, whether held directly or in a pooled or collective investment vehicle. Further, investments in developing or emerging markets may be more volatile and less marketable than in mature markets. Exchange rates may also affect the value of an overseas investment. As a result, an investor may not get back the amount originally invested. Past performance is not necessarily a guide to future performance.

Appendix 1 – Asset allocation as at 31 August 2020

Asset class	Fund	Value as at 31 Aug 2020 £m	Actual asset allocation	Interim strategic allocation
Global equities (ex UK)	LGIM passive	365.4	38.8%	43%
Global equities (inc UK)	BlackRock low carbon	-	-	
UK equities	LGIM passive	102.4	10.9%	5%
Emerging markets	LCIV (JP Morgan)	41.8	4.4%	5%
Private equity	Capital Dynamics	40.9	4.3%	5%
Total growth		550.5	58.4%	58%
Diversified growth	LCIV (Baillie Gifford)	125.4	13.3%	10%
Absolute return	LCIV (Ruffer)	53.7	5.7%	10%
Infrastructure	LCIV, Cap Dynamics, Alinda	33.1	3.5%	5%
Property	Aviva	0.0	-	-
Total diversifiers		212.2	22.5%	25%
Multi-asset credit	LCIV (CQS)	39.6	4.2%	5%
Government bonds	BlackRock	91.3	9.7%	10%
Cash		49.1	5.2%	2%
Total protection		180.0	19.1%	17%
Total		942.8		

Appendix 2 – Background on UK equities

Sector composition

While there are many reasons that UK equities have underperformed the wider global equity index not limited to: economic growth, political factors, monetary policy and currency movements, one of the most commonly sighted reasons is the sector composition of the UK equity market. The UK market has less sector diversification when compared with the global index (see table below).

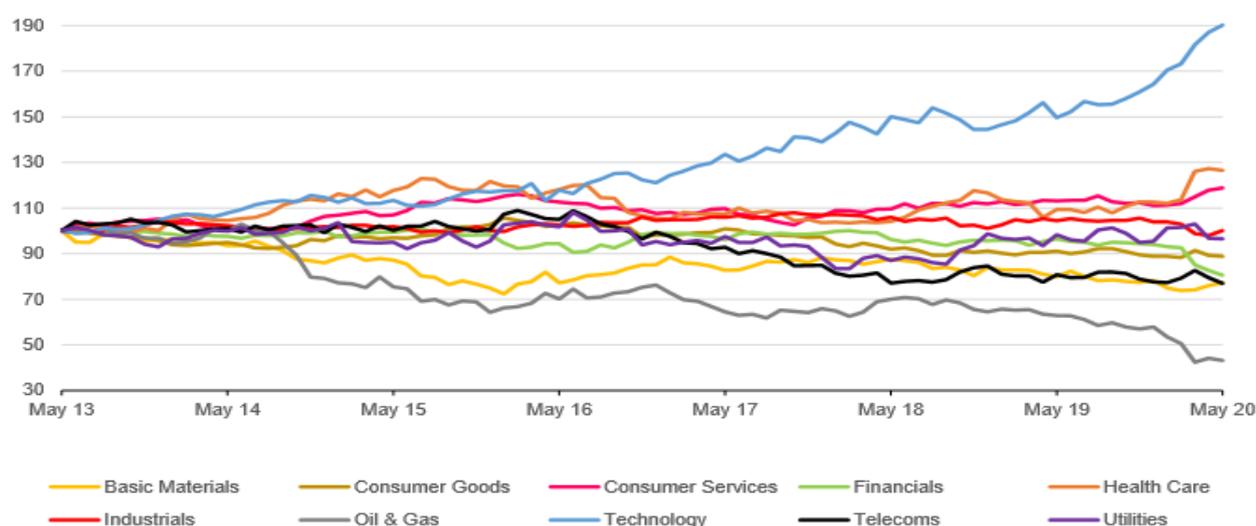
	FTSE All Share (%)	FTSE All World (%)	Relative (%)
Oil & Gas	7.7	3.5	+4.2
Basic Materials	8.9	4.0	+4.9
Industrials	12.2	12.0	+0.2
Consumer Goods	15.7	11.0	+4.7
Health Care	11.7	12.0	-0.3
Consumer Services	11.5	12.6	-1.1
Telecommunications	2.3	2.6	-0.3
Utilities	3.5	3.2	+0.3
Financials	25.2	17.6	+7.6
Technology	1.2	21.5	-20.3
Total	100.0	100.0	-

Source: FTSE Russell. As at 31 July 2020. Totals may not sum due to rounding.

Relative to the global index, the UK has a high weighting to Oil and Gas, Basic Materials, Financials and Consumer Goods sectors – most of which have a high degree of cyclicity and a very significant underweight to Technology – that has been delivering outstanding performance, particularly over the last 5 years.

The reason for the sector-driven underperformance becomes clear when looking at the chart below showing relative sector performance over the last 7 years. All 4 of the most overweight UK sectors (Oil and Gas, basic Materials, Financials and Consumer Goods) are in the bottom 5 performing sectors relative to the Global index. Furthermore, technology – where the UK is underweight – has outperformed all other sectors over the period.

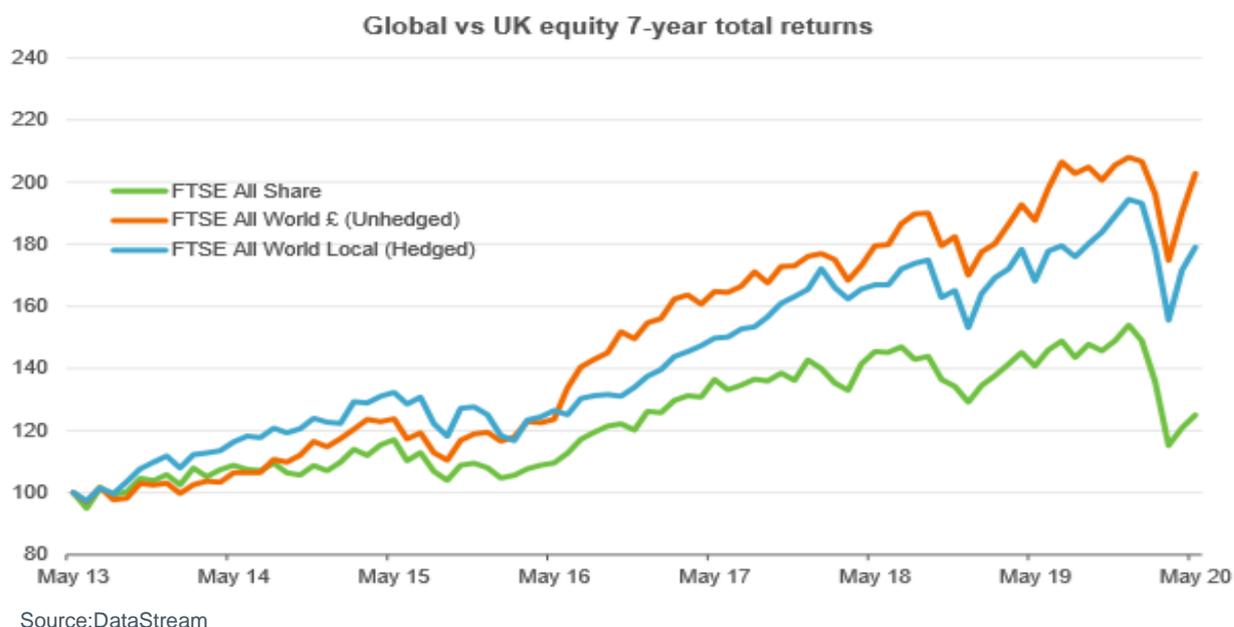
Global equity sectors v FTSE All World 7 years to 31 May 2020



Source:DataStream

Impact of Sterling depreciation

A common challenge on the outperformance of the Global index vs UK is that this outperformance has been driven by currency effects. The chart below compares UK equity total returns vs global over the last 7 years.



Over the last 5 years sterling has weakened significantly. However, as the above chart shows, even if fully hedging foreign currency exposure the global index has still outperformed the UK market by some margin over the last 7 years. While decisions on foreign currency hedging do play a part in returns (certainly over the short and medium term) we would expect the regional allocation to have an even greater bearing on returns.

Concentration of holdings

A further observation is the high concentration of the largest companies in the UK index relative to that of the global index. This is illustrated in the below table which shows that the top 10 holdings in the UK represents c34% of the total index – more than double that of the global index. The UK index also has c1/7th of the total number of constituents: FTSE All Share = 613 and FTSE All World = 3,945 (as at 31 July 2020).

Position	FTSE All Share	Weight (%)	FTSE All World	Weight (%)	Country
1	AstraZeneca	6.0	Apple	3.5	USA
2	GSK	4.0	Microsoft	3.1	USA
3	HSBC	3.7	Amazon	2.7	USA
4	Diageo	3.4	Facebook	1.2	USA
5	British American Tobacco	3.1	Alphabet A	0.9	USA
6	BP	2.9	Alibaba	0.9	China
7	Rio Tinto	2.7	Alphabet C	0.9	USA
8	Unilever	2.7	Tencent	0.8	China
9	Reckitt Benckiser Group	2.6	Johnson & Johnson	0.8	USA
10	Shell	2.5	Taiwan Semiconductor Manufacturing	0.7	Taiwan
	Total	33.6		15.4	

Source:FTSE Russell. As at 31 July 2020. Totals may not sum due to rounding.

Appendix 3 – Past performance of multi-asset funds

Ruffer

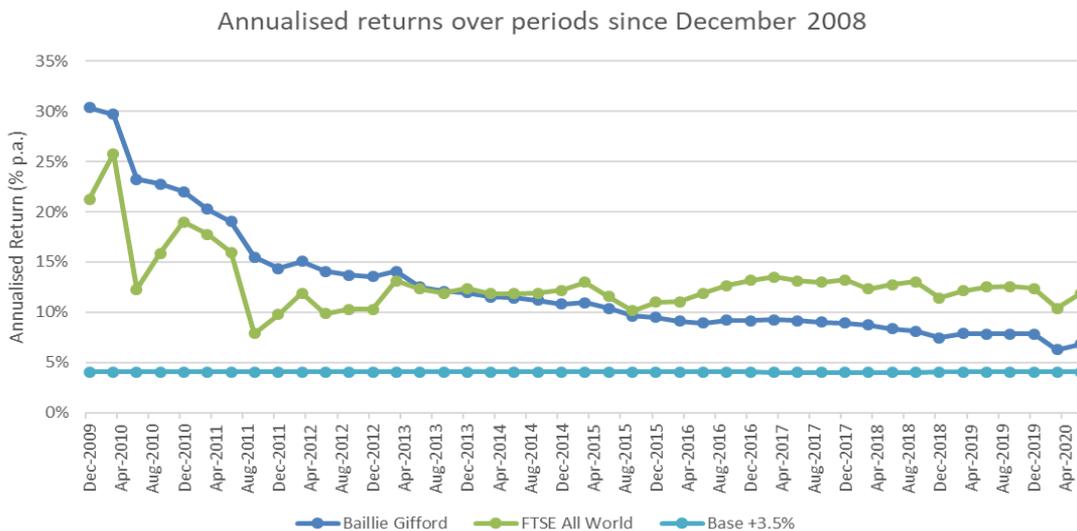
The chart below shows the annualised return over various time periods, all starting from 30 June 1995. As an example, this shows that the return achieved by Ruffer over the 10 year period to June 2005 is around 12% p.a. Over the same time period, the FTSE All World index produced a return of around 6% p.a. This chart shows that Ruffer have achieved a return broadly in line with the FTSE All World Index over the last c25 years.



Source: eVestment

Baillie Gifford

The chart below shows the annualised return over various time periods, all starting from 31 December 2008. As an example, this shows that the return achieved by Baillie Gifford over the 10 year period to December 2018 is around 7% p.a. Over the same time period, the FTSE All World index produced a return of around 11% p.a. The chart also shows that over the period since December 2008, the return achieved by Baillie Gifford has lagged behind the return on the FTSE All World Index.



Source: eVestment

This page is intentionally left blank

 <p>Brent</p>	<p>Pensions Fund Sub-Committee 6 October 2020</p> <hr/> <p>Report from the Director of Finance</p>
<p>CMA Objectives</p>	

Wards Affected:	ALL
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	1. Strategic objectives for Investment Consultants
Background Papers:	▪ N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Minesh Patel, Director of Finance Ravinder Jassar, Head of Finance Sawan Shah, Senior Finance Analyst

1.0 Purpose of the Report

1.1 The purpose of this report is to the outline proposed approach to be taken by the Fund in relation to the assessment of Hymans Robertson against objectives set in 2019.

2.0 Recommendation(s)

2.1 The Committee is asked to note:

- The objectives set by the Fund and the metrics to be used by Officers in assessment of these objectives;
- The approach to be taken by Officers in respect of the CMA objectives.

3.0 Detail

3.1 In June 2019, the Competition and Markets Authority (“CMA”) published its final order following a review of the investment consulting and fiduciary management markets. The order included a requirement for pension scheme trustees (in the case of the LGPS, this is the Pensions Sub-committee) to set objectives for their investment consultants and made this a regulatory requirement.

- 3.2 Since 10 December 2019 pension scheme trustees must set strategic objectives for their investment consultants before they enter into a contract or continue to receive services from them.
- 3.3 Pension scheme trustees must submit 'compliance statements' stating that they have complied with the above requirement. Currently the CMA order only requires trustees to confirm that they have complied with the requirements over the period having had objectives in place.
- 3.4 The 'compliance statements' need to be submitted within 12 months and 4 weeks from the 10 December 2019 and annually thereafter. Therefore the Compliance Statement must be submitted to the CMA by **07 January 2021**.
- 3.5 It is expected that the Department for Work and Pensions (DWP) will amend current legislation so that the CMA requirements become part of pension law (and will then be overseen by The Pensions Regulator).
- 3.6 Supplementary detail is expected in due course from the Ministry for Housing, Communities and Local Government ("MHCLG") on how the CMA's requirements will be translated into LGPS regulation. Until then though the CMA rules continue to apply to the LGPS as per the original order.
- 3.7 Under the CMA requirements, the Fund is only required to complete a compliance statement, essentially acknowledging they have and will continue to have objectives in place for their investment consultants.
- 3.8 However, the Fund believe it is important to regularly monitor and assess performance against the objectives set as part of a robust governance regime.
- 3.9 This is in line with guidance¹ from The Pensions Regulator ("tPR") which suggests that the Fund should look to assess performance on an annual basis and complete a detailed review of the objectives to ensure these remain suitable at least every three years.
- 3.10 The objectives the Fund agreed last year and the metrics to be used by Officers in assessment of these objectives are set out in Appendix 1. Officers will work with Hymans Robertson to collate the necessary information before undertaking assessment over the next few months. The outcome of the assessment will be reported to the next meeting of the Sub-committee.
- 3.11 Separately, the compliance notice to the CMA will be submitted by January 2021 as required.

4.0 Financial Implications

- 4.1 Not applicable.

¹ <https://www.thepensionsregulator.gov.uk/en/document-library/regulatory-guidance/tender-and-set-objectives-for-investment-service-providers/set-objectives-for-your-investment-consultant/#f83029c35e34463583f91097dbd681b7>

5.0 Legal Implications

5.1 Not applicable.

6.0 Equality Implications

6.1 Not applicable.

7.0 Consultation with Ward Members and Stakeholders

7.1 Not applicable.

8.0 Human Resources

8.1 Not applicable.

Report sign off:

Minesh Patel
Director of Finance

This page is intentionally left blank

Appendix 1

Your requirements	Our objectives	Metrics
Ensure members' benefits are met as they fall due	Advise on a suitable investment strategy, and amendments to the strategy, to deliver the required investment returns, within specified risk tolerance.	Assessment of current and alternative investment strategies including evaluation of expected return.
Support a long term funding approach that is consistent with a stable and affordable contribution approach from the employers	Deliver an investment approach that reflects the Fund's cashflow position, and likely evolution, and minimises the risk of forced disinvestment	Evidence of proactivity on strategy monitoring (including cashflow requirements) and recommendations including accounting for periods of market volatility and the evolution of the LCIV.
Align the Fund's approach with the objectives of pooling and associated guidance	Advise on the cost-efficient implementation of the Fund's investment strategy as required, considering approaches including via the London CIV.	Evidence of clear communication with the London CIV and feedback to Officers.
Seek cost efficient implementation of the Fund's investment strategy		Evidence of advice regarding cost efficient implementation e.g. advice in relation to any transitions undertaken over the period and where necessary provide cost analysis.
Ensure the Fund's approach reflects relevant regulatory and legislative requirements	Ensure our advice complies with relevant pensions regulations, legislation and supporting guidance.	RI training delivered over the last 12 months leading to initial investment in low carbon fund, plus high level review of other asset classes.
Develop the Committee's Responsible Investment policy and ensure this is reflected in ongoing governance and decision making processes	Develop the Committee's policies and beliefs, including those in relation to Responsible Investment.	Evidence of review of beliefs and objectives
	Provide advice that reflects the Committee's own policies and beliefs, including those in relation to Responsible Investment considerations	Evidence of investment advice and recommendations provided over the last 12 months capturing Committee's beliefs,
Seek to ensure the Fund's investment objectives are supported by an effective governance framework	Provide relevant and timely advice	Feedback in relation to responsiveness and timelessness of advice
	Develop knowledge and understanding of investment matters	Evidence of training delivered over the last 12 months
	Our services to support your ongoing governance shall be proportionate and competitive in terms of costs relative to our peer group	Evidence of development of relevant governance documents e.g. strategic roadmap/business plan to deliver strategic objectives over short-medium term Evidence of review of governance documents, e.g. ISS review

This page is intentionally left blank

 <p>Brent</p>	<p>Pensions Fund Sub-Committee 06 October 2020</p>
	<p>Report from the Director of Finance</p>
<p>Brent Pension Fund: Annual Report and Accounts 2019/20</p>	

Wards Affected:	ALL
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	OPEN
No. of Appendices:	1. Annual Report and Accounts 2019/20
Background Papers:	<ul style="list-style-type: none"> ▪ N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Minesh Patel, Director of Finance Ravinder Jassar, Head of Finance Sawan Shah, Senior Finance Analyst

1.0 Purpose of the Report

1.1 This report presents the draft Pension Fund Annual Report and audited Annual Accounts for the year ended 31 March 2020.

2.0 Recommendation

2.1 The Committee is recommended to note and approve:

- The audited accounts included as part of the annual report;
- The draft Pension Fund Annual report which will be published as set out in paragraph 3.3;
- The updated Investment Strategy Statement (ISS).

3.0 Detail

3.1 The accounts (Appendix A) have been prepared to meet the requirements of the Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 (the Code) governing the preparation of the 2019/20 financial statements for Local Government Pension Scheme funds. The audited accounts aim to give a true and fair view of the financial transactions of the

Pension Fund during the year ended 31 March 2020 and the amount and disposition of the Fund's assets and liabilities as at 31 March 2020.

3.2 The main items to note are as follows:

- There have been no major changes to the Audited Annual Accounts since the submission of the Draft Annual Accounts. Only minor changes and additional clarifications have been made.
- During 2019/20, the value of the Pension Fund's investments has decreased to £835m (2018/19 £856m). This is due to the poor performance of equity markets in the final quarter of the year related to COVID-19. At the end of December 2019, investments were valued at £935m.
- Total contributions received from employers and employees totalled £60m for the year, an increase on the previous year's £52.1m.
- Total benefits paid to scheme beneficiaries, in the form of pensions or other benefits, totalled £48m, an increase on the previous year's £46m.
- As in 2018/19, the Fund is in a positive cash-flow position because its contributions exceed its outgoings to members.
- The Fund completed its 2019 valuation in the 2019/20 financial year. It was agreed in the valuation that the employer contribution rate would remain stable at 35% for the next 3 years. This is consistent with the Fund's deficit recovery plan to clear its deficit within 19 years of the balance sheet date.

3.3 The annual accounts have been audited since the draft accounts were presented to the committee at the previous meeting. Only minor amendments and additional clarifications were made to the draft accounts. The draft Pension Fund annual report is currently in the process of being audited and is due to conclude shortly. To date no major queries have been raised by the auditors. Regulations require the annual report to be published on or before 1 December. The Fund will publish the report on completion of the audit process and before the required deadline.

3.4 The Pension Fund Annual report also includes the Fund's updated Investment Strategy Statement (ISS). This in line with Regulation 7 of the Local Government Pension Fund (Management and Investment of Funds) Regulations 2016 which requires administering authorities to prepare, publish, and when appropriate revise, a written statement recording the investment policy of the pension fund.

3.5 The ISS has been updated to reflect the outcome of the Investment Strategy Review agreed by the Sub-committee in February 2020. Key changes include:

- Updated interim and long term target asset allocations and the maximum percentage of the total Fund value that will be invested in these assets;
- A summary of updates made to the long term strategic allocation;
- The Committee's commitment to ongoing development of its ESG policy;
- Additional investment beliefs agreed in light of the Fund's increased focus on, and importance of, responsible investment.

3.6 The Pension Fund annual report also incorporates the Pensions Administration Strategy, Funding Strategy Statement and Communications Policy Statement which have been approved by the Committee at previous meetings.

4.0 Financial Implications

4.1 Not applicable.

5.0 Legal Implications

5.1 Not applicable.

6.0 Equality Implications

6.1 Not applicable.

7.0 Consultation with Ward Members and Stakeholders

7.1 Not applicable.

8.0 Human Resources

8.1 Not applicable.

Report sign off:

Minesh Patel
Director of Finance

This page is intentionally left blank



Brent Pension Fund

Annual Report and Accounts 2019/20

Pensions Regulator Scheme Number: 10272080

1. Chairman’s Foreword	3
2. Management and Financial Performance	4
a. Scheme management and advisors	4
b. Risk management	8
c. Financial performance.....	11
3. Investment Policy and Performance	13
4. Asset Pools	17
5. Scheme Administration.....	19
6. Actuarial Information.....	25
7. Governance.....	28
8. Brent Pension Accounts	33
9. Independent Auditor’s Report	64
10. Glossary	67
11. Appendices.....	75
a. Pensions Administration Strategy.....	75
b. Employer Numbers Table.....	94
c. Funding Strategy Statement.....	98
d. Investment Strategy Statement	142
e. Communications Policy Statement.....	156

1. Chairman's Foreword

It is my pleasure to present the Annual Report and Accounts of the Brent Pension Fund for 2019/20.

The Fund has 7,070 contributors, 6,986 pensioners and 7,910 deferred pensioners.

The scheme is administered locally and is a valuable part of the pay and reward package for employees working in Brent Council or working for other employers in the Borough participating in the scheme.

During 2019/20, the value of the Pension Fund's investments has decreased to £835m (2018/19 £856m). This is due to the poor performance of equity markets in the final quarter of the year related to COVID-19. At the end of December 2019, investments were valued at £935m.

Total contributions received from employers and employees was £60m for the year, an increase from the previous year. Total benefits paid to scheme beneficiaries, in the form of pensions or other benefits, was £48m, an increase on the previous year's £46m. As in 2018/19, the Pension Fund is in a positive cash-flow position because its contributions exceed its outgoings to members. This means that the Pension Fund is able to invest some of the contributions from members in order to further increase the assets available to pay future benefits. This is in contrast to some Local Government Pension Scheme funds, who have to use some of their investments each year, reducing the assets on which they can make returns.

The Brent Pension Fund is revalued every three years by an independent actuary. The Pension Fund had its most recent Triennial Review in 2019. This is a detailed appraisal that uses economic and demographic assumptions in order to estimate future liabilities and set employer contribution rates. It was agreed in this valuation that the employer contribution rate would remain stable at 35% for the next 3 years. This is consistent with the Fund's deficit recovery plan to clear its deficit within 19 years of the balance sheet date. This Triennial Valuation revealed that the Fund's assets, at 31 March 2019, were sufficient to meet 78% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. This is a significant increase on the 55% funding level as at the March 2016 valuation.

In conclusion, I would like to extend my thanks and appreciation to all members of the Pension Fund Sub-Committee and officers for their continued input to the strong governance and management arrangements of the Fund.

Clr Shafique Choudhary
Chairman, Brent Pension Fund Sub-Committee

2. Management and Financial Performance

a. Scheme management and advisors

Administering Authority:	Brent Council Civic Centre Engineers Way Wembley Middlesex HA9 0FJ
Brent Pension Fund Officers:	Minesh Patel, Director of Finance Ravinder Jassar, Head of Finance Sawan Shah, Senior Finance Analyst Saagar Raitthatha, Finance Analyst Kastur Varsani, Assistant Accountant
Legal Advisers:	In-house
Custodian:	Northern Trust
Actuary:	Hymans Robertson
Financial Adviser:	William Marshall - Hymans Robertson LLP
Fund Managers:	Legal & General Capital Dynamics London CIV LCIV – Baillie Gifford LCIV – CQS LCIV – Henderson/JP Morgan* LCIV – Stepstone LCIV –Ruffer Aviva Alinda Blackrock * Manager changed from Henderson to JP Morgan in 2019/20.
Banker:	NatWest
Auditor:	Grant Thornton
Performance Measurement:	Northern Trust
AVC Providers:	Prudential Clerical Medical Equitable Life (legacy only)

The Local Government Pension Scheme

The Government Pension Scheme (LGPS) is a statutory pension scheme.

This means that it is very secure as its benefits are defined and set out in law.

Under regulation 34 of The Local Government Pension Scheme (Administration) Regulations 2008 No.239, all LGPS funds are required to publish an Annual Report.

This document is the Annual Report and Accounts of the Brent Pension Fund for 2019/20

The LGPS in brief

- The LGPS is one of the largest public sector pension schemes in the UK, with 5.9 million members.
- It is a nationwide pension scheme for people working in local government or for other types of employer participating in the scheme.
- The LGPS is administered locally by 90 regional pension funds – one of which is the Brent Pension Fund.
- It is a funded scheme, which means that Fund income and assets are invested to meet future pension fund commitments.
- Benefits are defined and related to members' salaries, so they are not dependant on investment performance. Ultimately the local authority and local taxpayers are the final guarantors.
- The scheme is regulated by Parliament.

Governance

Governance Statement

The Brent Pension Fund publishes a Governance Statement each year. The latest version of this document is at page 28.

The Governance Statement reflects the Fund's commitment to transparency and engagement with employers and scheme members.

We monitor, review and consult where appropriate to ensure that our governance arrangements continue to be effective and relevant.

Administering Authority

Brent Council is the Administering Authority of the Brent Pension Fund and administers the LGPS on behalf of its participating employers.

- Brent Council has delegated its pensions functions to the Pension Fund Sub-Committee
- Brent Council has delegated responsibility for the administration and financial accounting of the Fund to the Director of Finance
- This report supports Brent Council's Annual Governance Statement, which is published at page 28.

Governance Compliance

The Brent Pension Fund is fully compliant with the principles set out in the Local Government Pension Scheme (Administration) Regulations 2008 (as amended) Regulation 31.

The full compliance statement is at page 30.

Pension Fund Sub-Committee

The Pension Fund Sub-Committee is responsible for the strategic management of the assets of the Fund and the administration of benefits. The Pension Fund Sub-Committee meets quarterly to:

- Ensure compliance with legislation and best practice
- Determine policy for the investment, funding and administration of the Fund
- Monitor performance across all aspects of the service
- Consider issues arising and make decisions to secure efficient and effective performance and service delivery
- Appoint and monitor advisers
- Ensure that arrangements are in place for consultation with stakeholders as necessary.

Pension Fund Sub-Committee Membership as at 31 March 2020

Chair: Cllr S Choudhary

Other Members: Cllr A Aden
Cllr M Daly
Cllr M Maurice
Cllr K Perrin
Cllr T Stephens

Employee representatives: Elizabeth Bankhole (UNISON)

Other attendees: Minesh Patel, Director of Finance
Ravinder Jassar, Head of Finance
William Marshall, Financial Adviser

Pension Fund Sub-Committee Training

Training is business driven, therefore the programme is flexible. This allows us to effectively align training with operational needs and current agenda items, helping to support Member decision making.

Member training is supplemented by attendance at investment conferences and other associated events.

Conflict of Interests

There is a standing agenda item at each Pension Fund Sub-Committee meeting for Members to declare any personal or prejudicial interests.

Accountability and Transparency

Pension Fund Sub-Committee agendas, reports and minutes are published on the Brent Council website at www.brent.gov.uk.

b. Risk management

The Fund's primary long-term risk is that the Fund's assets will fall short of its liabilities (i.e. promised benefits payable to members). Therefore, the aim of investment risk management is to minimise the risk of an overall reduction in the value of the Fund and to maximise the opportunity for gains across the whole Fund portfolio.

The Fund looks to achieve this through asset diversification to reduce exposure to market risk (price risk, currency risk, and interest rate risk) and credit risk to an acceptable level. In addition, the Fund manages its liquidity risk to ensure there is sufficient liquidity to meet the Fund's forecast cash flows.

The Pension Fund manages these investment risks as part of its overall pension fund risk management programme. Responsibility for the Fund's risk management strategy rests with the Pension Fund Sub-Committee.

Risk management policies are established to identify and analyse the risks faced by the Pension Fund's operations. Policies are reviewed regularly to reflect changes in activity and in market conditions.

The Brent Pension Fund maintains a Risk Register which is reviewed and reported to every Pension Board meeting. Risks are rated on a "traffic light system" and are monitored on a regular basis for review. Controls are documented and further actions identified where necessary. Attached an appendix to the annual report is the Brent Pension Fund Risk Register.

This Risk Management Programme in place ensures that key risks are identified and that mitigating actions are taken to control these Risks. Appendix C as part of the Funding Strategy Statement notes each Objective Area in which these Risks are summarized and the mitigating actions being taken to control them.

Third Party Risks

Third party risks such as payments of contributions are robustly monitored, as laid out in the Pensions Administration Strategy. The receipt and calculation of employer pension contributions is monitored monthly. Employers are required to complete a return, which reconciles to the pension payment and verifies the calculation of both employee and employer contributions.

The Council has also outsourced the following functions of the Fund:

- Custodianship of assets.
- Pensions administration in coordination with the Brent pensions administration team who monitors and manages the Fund's contractor for pension administration services, Local Pensions Partnership (LPP).

As these functions are outsourced, the Council is exposed to Third Party Risk. A range of investment managers are used to diversify risk. To mitigate the risks regarding custodianship of assets, assurance over third party operations is sought by requesting relevant documentation, such as AAF 01/06 and ISAE3402 assurance reports on the internal controls of these service organisations. Any weaknesses in controls are reviewed and reported as necessary to the Pension Fund Sub-Committee.

Fund Manager	Type of Assurance	Control Framework	Compliance with Control	Reporting Accountant
Alinda	ISAE4302	Reasonable assurance	Reasonable assurance	Deloitte LLP
Aviva	ISAE4302	Reasonable assurance	Reasonable assurance	PwC LLP
BlackRock	ISAE4302	Reasonable assurance	Reasonable assurance	Deloitte LLP
Capital Dynamics	ISAE4302	Reasonable assurance	Reasonable assurance	PwC LLP
London CIV	ISAE4302	Reasonable assurance	Reasonable assurance	PwC LLP
LGIM	ISAE4302	Reasonable assurance	Reasonable assurance	KPMG LLP

An on-going framework of inspection and review by the Fund's internal auditors (PwC) and external auditors (Grant Thornton) supports and assists with the management of risks.

During 2019/20, internal audit undertook a review of the Council's arrangements in regards to current investments, strategic asset allocation and compliance with MHCLG regulations. This review aimed to provide assurance over the following sub-processes and control objectives. The audit focused on key controls in place in relation to the sub-processes listed below, to mitigate the potential risks:

- Governance;
- Governance compliance statement;
- Risk management;
- Investments;
- Monitoring;
- Environmental, social and governance factors;
- Independent Advisor, and
- Pension Fund
- Policies.

All the scope areas were examined during the audit and no high level risk areas were reported. In addition, internal audit has identified a number of examples of good practice. 2 medium risk and 2 low risk recommendations were reported. Any risks identified were agreed between internal audit and management and actions are being undertaken to ensure that the recommendations are implemented and are operating effectively.

Other Investment Risk

Brent Pension Fund constantly monitors risk at all levels. In investment, risk is defined as the permanent loss of capital. Risks are assessed at market level, and also at the fund manager level. Fund managers may employ a range of measures to mitigate risk, wherever possible. This may range from a process which avoids overpaying for an asset, or fund manager's risk committees and investment committees, which meet regularly to review and challenge the fund manager's approach and assumptions. Fund managers must contend with the potential mispricing of risk, caused by the hunger for yield.

The Pension Fund employs an Investment Advisor, Hymans Robertson to assist and advise the Pensions Sub Committee. Investment performance is reviewed by the committee every quarter.

Brent Pension Fund monitors the fund managers at least every quarter, when they report their performance. At this stage, it is not just the net returns which are studied, but also the attribution, i.e. the way in which the returns were achieved. The returns should be measured against the expected returns given prevailing market conditions and the investment process, in order to ensure that the fund manager is not tending towards "investment drift" or "style drift". Particular attention is paid to the actions taken by funds when market conditions change.

Pension Fund Officers ensure that all tasks carried out are compliant with best practise as detailed in the Statement of Investment Principles. This is in order to mitigate any governance risk (such as acting *ultra vires*).

Pension Fund Officers document meetings with fund managers, and report back to the Pension Fund Sub-Committee on a quarterly basis.

The key risks and controls in place to mitigate investment risks are included in the Funding Strategy Statement.

c. Financial performance

Financial Summary

Income and expenditure of the fund over the past four years is shown below. This shows that a net increase in the Fund's market value of £163m over the period. This is mostly attributable to the change on market value of £171m over the period. During 2019/20, the Fund value decreased by £26m. This is primarily due to the poor performance of equity markets in the final quarter of the year related to COVID-19. A detailed analysis of the Fund's financial performance, including the movement in non-investment assets and liabilities, can be found in the statement of accounts at page 33 of this report.

Financial Summary	2016/17	2017/18	2018/19	2019/20
	£m	£m	£m	£m
Contributions receivable	(51.0)	(53.5)	(54.9)	(65.2)
Benefits payable	44.7	75.0	47.7	54.2
Net (additions)/withdrawals from dealings with members	(6.3)	21.5	(7.2)	(11.1)
Management expenses	3.9	4.3	6.8	3.8
Net return on investments	(4.1)	(0.9)	(1.4)	(1.2)
Change in market value	(121.2)	(22.4)	(61.7)	34.1
Net (increase)/decrease in Fund Value	(127.7)	2.5	(63.5)	25.6

Analysis of Dealings with Scheme Members

As shown in the table below, net contributions from members has been mainly positive over the past four years. The large outflow in 2017/18 related to the transfer out of the College of North West London from the Fund. Employer contributions have risen due to an increase in the main employer contribution rate and pension stain income. Transfers in increased due to more new members choosing to transfer in benefits. Transfers out also increased reflecting more members electing to transfer their benefits to their new employer.

Analysis of Dealings with Scheme Members	2016/17	2017/18	2018/19	2019/20
	£m	£m	£m	£m
Contributions receivable				
Members	(8.3)	(8.1)	(9.2)	(8.5)
Employers	(40.3)	(41.8)	(42.9)	(51.5)
Transfers In	(2.4)	(3.6)	(2.8)	(5.2)
Total	(51.0)	(53.5)	(54.9)	(65.2)
Benefits payable				
Pensions	33.0	34.4	37.7	38.6
Lump sum retirement and death benefits	7.2	4.5	8.2	9.3
Transfers Out	4.2	35.9	1.7	6.2
Refunds to members leaving service	0.3	0.2	0.1	0.0

Total	44.7	75.0	47.7	54.1
Net dealings with members	(6.3)	21.5	(7.2)	(11.1)

Analysis of Management Expenses

The costs of managing the Pension Fund are split into three areas: Administration expenses, Oversight and Governance costs and Investment management expenses. Administration costs increased in 2018/19 due to the new pensions administration contract and an increased level of data cleanse activity.

Analysis of Management Expenses	2016/17	2017/18	2018/19	2019/20
	£m	£m	£m	£m
Administration costs	0.7	0.7	1.2	1.1
Oversight and Governance costs	0.1	0.1	0.2	0.3
Other expenses	0.0	0.0	2.2	0.0
Investment management expenses				
Management fees	2.8	3.4	2.7	2.4
Custody fees	0.1	0.1	0.1	0.0
One-off transaction costs	0.1	0.0	0.4	0.0
Total	3.8	4.3	6.8	3.8

Contributions

Members of the LGPS pay a contribution rate dependant on the salary band they fall in to. The contribution rate employees pay depends on their salary. The bands and contribution rates for 2019/20 are set out in the table below.

Annual Pensionable Pay	Rate
Up to £14,400	5.5%
£14,401 to £22,500	5.8%
£22,501 to £36,500	6.5%
£36,501 to £46,200	6.8%
£46,201 to £64,600	8.5%
£64,601 to £91,500	9.9%
£91,501 to £107,700	10.5%
£107,701 to £161,500	11.4%
£161,501 or more	12.5%

Individual employers' rates vary depending on the demographic and actuarial factors particular to each employer. The most commonly applied employer contribution rate within the Brent Pension Fund was 35.0% in 2019/20.

Regulations state that contributions must be paid to the Fund by the 22nd day of the month following deduction. The Fund reserves the right to levy interest on an employer for the late payment of contributions. In 2019/20, this power was not exercised.

3. Investment Policy and Performance

Introduction

The Administering Authority invests the Fund in compliance with the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 which came into force on the 1st November 2016.

During 2019/20, the following external investment managers managed the Fund's assets:

- Legal & General (UK and overseas equities)
- Capital Dynamics (private equity and infrastructure)
- London CIV
- LCIV Baillie Gifford (diversified growth fund)
- LCIV Ruffer (diversified growth fund)
- LCIV CQS (Multi Asset Credit)
- LCIV Henderson/JP Morgan* (Emerging Markets)
- LCIV Stepstone (infrastructure)
- Aviva (property)
- Alinda (infrastructure)
- Blackrock (UK Gilts)

The cash balance is deposited with money market funds.

* Manager changed from Henderson to JP Morgan in 2019/20.

2019/20 Investment Results

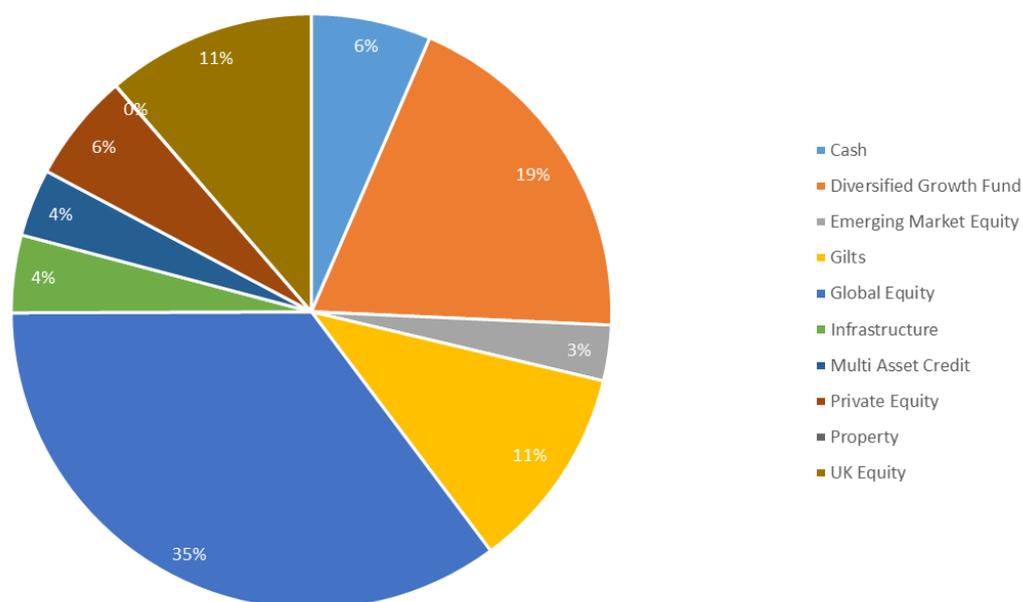
Asset Allocation and Fund Performance

The investment performance of the Brent Pension Fund in comparison to its benchmark for the period ended 31 March 2020 is shown below:

	Total Fund Return %	Fund Benchmark Return %
1 year	(3.9)	(2.7)
3 years	1.5	2.8
5 years	4.6	5.4

The current asset allocation includes allocations to passive UK and global equities, emerging market equities, diversified growth funds, infrastructure, longer dated gilts and multi-asset credit. The allocations to private equity and property are currently being wound down. A further allocation to infrastructure was agreed in 2018/19 and the fund made its first investment in this mandate in 2019/20. It will be some time before funds are fully invested. The asset allocation as at 31 March 2020 is illustrated by the below chart.

Asset Allocation at 31 March 2020



Overall the fund delivered a negative return of 3.9% for the year. Positive returns were achieved in quarters 1 (4.0%), 2 (3.2%) and 3 (0.3%). Returns in quarter 1 were mainly attributable to the increase in the value of Global Equities whilst in quarter 2 UK government bonds performed strongly. Fund performance was held back in quarter 4 where it contracted by 10.7%. This was primary attributable to the global spread of coronavirus and its impact on financial markets. In particular, equities fell significantly through this quarter.

The Fund's holdings by fund manager showing target asset allocation and performance over one, three and five year periods are shown below.

Investment	Asset Class	Planned Asset Allocation (%)	Market value 31 March 2020 (£m)	Allocation at 31 March 2020 (%)	Last Year (%)		Last 3 Years (%)		Last 5 Years (%)	
					Fund	Benchmark	Fund	Benchmark	Fund	Benchmark
UK Equities - L&G	UK Equity	40	94.1	11	-18.5	-18.5	-4.2	-4.2	0.7	0.6
Global Equities - L&G	Global Equity		293.4	35	-4.6	-4.6	3.1	3.1	8.1	8.1
UK Equities - London CIV	UK Equity		0.2	0	n/a	n/a	n/a	n/a	n/a	n/a
LCIV Henderson EM	Emerging Market Equity	5	25.2	3	-16.6	-13.5	-	-	-	-
DGF LCIV Baillie Gifford	Diversified Growth Fund	18	110.8	13	-8.8	3.3	-1.4	3.8	0.9	3.8
DGF LCIV Ruffer	Diversified Growth Fund		50.1	6	3.2	3.3	0.5	3.8	-	-
LCIV Multi Asset Credit	Multi Asset Credit	15	30.6	4	-13.9	4.0	-	-	-	-
Blackrock - Over 15 year GILTS	Gilts		92.6	11	17.7	17.6	-	-	-	-
Property (European) - Aviva	Property	5	0.1	0	3.5	0.0	-28.9	4.9	-13.6	-
Private Equity - Capital Dynamics	Private Equity	5	49.1	6	8.2	-10.4	13.1	1.5	14.4	4.0
Infrastructure - Capital Dynamics	Infrastructure	12	10.1	1	-11.3	4.7	-3.3	6.9	3.9	7.3
Infrastructure - ALINDA	Infrastructure		24.6	3	13.0	4.7	-4.9	6.9	1.1	7.3
Infrastructure - LCIV Stepstone	Infrastructure		0.5	0	-	-	-	-	-	-
Cash	Cash	0	53.9	6	-	-	-	-	-	-
TOTAL		100.0	835.3	100	-3.9	-2.7	1.5	2.8	4.6	5.4

Further analysis and commentary on the investment performance of individual mandates can be found within the Fund's performance monitoring reports that are presented to the Pensions Sub-committee.

It is important to consider the risk framework in which the investment results are achieved. If the Fund takes more risk in its asset allocation decisions, it offers the potential for higher returns but it also increases the uncertainty of the outcome, potentially increasing the chances of a negative downside. The Fund is committed to on-going review of its asset allocation and achieving an appropriate balance between risk and reward. Further information can be found in the Investment Strategy Statement.

Comparison of investment performance with other LGPS Funds

The Fund's investment performance in comparison to the PIRC Local Authority percentile average for all Local Government Pension Schemes (LGPS) funds nationally is shown below (the PIRC universe consists of 63 LGPS funds):

	Rank	Period ended 31 Mar 20	PIRC Local authority Average
1 year	42	(3.9)	(4.8)
3 years	60	1.5	1.9
5 years	60	4.6	5.2
10 years	88	6.0	6.9

It is important to note that, as a long term investor, investment returns over a longer period of time should be considered. The table below shows the rolling three year performance of the Fund compared to other LGPS funds:

	Rank	Rolling 3 year return
2019/20	42	1.5
2018/19	26	8.5
2017/18	80	6.8
2016/17	75	9.9
2015/16	49	6.5
2014/15	80	10.1

Funding Strategy Statement (FSS)

In accordance with the Local Government Pension Regulations, Brent Pension Fund has a Funding Strategy Statement in place which can be found at page 98.

Investment Strategy Statement (ISS)

The Investment Strategy Statement sets out the policy which determines how the Fund invests its assets. This can be found on page 142 of this document. The Scheme rules require that we publish the ISS that covers our policy on:

- The types of investment to be held
- The balance between different types of investments
- Attitude to risk and approach to its management
- the expected return on investments
- The extent to which social, environmental or ethical considerations are taken into account.

4. Asset Pools

In 2015 the Department of Housing, Communities and Local Government (as it then was) issued LGPS: Investment Reform Criteria and Guidance which set out how the government expected funds to establish asset pooling arrangements. The objective was to deliver:

- benefits of scale
- strong governance and decision making
- reduced costs and excellent value for money, and
- an improved capacity and capability to invest in infrastructure.

This has led to the creation of eight asset pools which have significantly changed the previous approach to investing, although it should be stressed that the responsibility for determining asset allocations and the investment strategy remains with individual pension funds.

The Brent Pension Fund joined other London local authorities in creating the London Collective Investment Vehicle (LCIV), the regional pool operator for the capital. The London CIV is now established and has £7.6bn of LGPS assets under management as at 31 March 2020. Additionally, the value of passive assets was £9.1bn with £6.4bn invested with LGIM and £2.7bn managed by Blackrock.

London CIV's annual review for the year ended 31st March 2020 can be found at: <https://londonciv.org.uk/wp-content/uploads/2020/07/london-civ-annual-review-2019-20-2786.pdf>

Pooled assets

Overall, the Fund continued to increase the investments it has made through the London CIV. During 2019/20, the Fund made its first investment in the London CIV infrastructure fund. In line with standard industry practice for infrastructure investments, it will be some time before funds are fully invested.

As at 31/03/2020, the Fund had 5 investments with the London CIV: Emerging Market equities (through JP Morgan), Diversified Growth Funds (Baillie Gifford/Ruffer), Multi Asset Credit (CQS) and Infrastructure (Stepstone). Additionally, the Fund's passive equity investments through Legal and General and Gilts through Blackrock are arranged through the London CIV's negotiated mandate where the Fund benefits from lower negotiated fees.

All asset classes except Property, Private Equity, Infrastructure and Cash are managed by the London CIV asset pool. Therefore, the Fund has approximately 84% of its investments held with the regional pool or under the pool's oversight.

The table below shows the pooling status of the Fund's investments grouped by asset class:

	Pooled £m	Non- pooled £m	Total
Asset Class			
Global Equities	318.6		318.6
UK Equities	94.3		94.3
Diversified Growth Fund	160.9		160.9
Fixed Income	123.2		123.2
Property		0.1	0.1
Private Equity		49.1	49.1
Infrastructure	0.5	34.7	35.2
Cash		53.9	53.9
Total	697.5	137.8	835.3
Investment Management Costs	1.2	1.2	2.4

Investment management costs totalled £2.4m in 2019/20 as disclosed in the Pension Fund Accounts. A breakdown of pooled and non-pooled investment management costs for the year is provided in the table above.

Pool set-up and ongoing costs

The table below shows pool setup and on-going costs paid to London CIV during 2019/20 and since inception:

	2019/20 £'000	Cumulative £'000
Set up costs		
Shareholding at cost	0	150
Development Funding Charge	65	205
Annual Service Charge	25	125
Ongoing investment management costs		
Investment management costs*	26	66
Total	116	546

*Only includes management fees for passive investments arranged through London CIV.

Contact Details

The London CIV can be contacted as follows:

Post: London CIV, Fourth Floor, 22 Lavington Street, London, SE1 0NZ

Telephone: 0208 036 9000

Website: londonciv.org.uk

Email: pensionsCIV@londonciv.org.uk

5. Scheme Administration

The Brent Pensions Team

The Brent Pensions Team monitors and manages the Fund's contractor for pension administration services, Local Pensions Partnership (LPP). The team is a contact point for employees who wish to join the scheme, for advice on procedures and for queries and complaints.

The Pensions Team is accountable to the Pension Fund Sub-Committee, participating employers and scheme members. The team are fully committed to providing a quality service to meet the needs of the Fund's various stakeholders and to delivering excellent customer care.

The team's responsibilities include the following:

- Ensuring the accuracy of pensions records, including the preparation and distribution of the Annual Benefit Statements to all scheme members
- The timely collection of contributions
- Advice and guidance to scheme members
- Advice and guidance to employers
- Early retirement schemes for Fund employers.

Operational costs

The Fund's operational costs are monitored throughout the year by the Fund's management team and reported in the Pension Fund Annual Accounts.

To enable assurances to be obtained as to the effective and efficient operation of the Fund's investments, performance is benchmarked on an annual basis against other local authority pension funds subscribing to the PIRC Local Authority Pension Performance Analytics' Universe of local authority pension funds. Internal controls are also in place to support the reliability and integrity of financial information and the Fund is subject to internal and external audit.

Value for Money Statement

The Brent Pension Fund aims to deliver value for money services to all members and employers within the Fund. In order to demonstrate the efficiency and effectiveness of these services provided, officers in the Brent Pensions Team in coordination with the Fund's Pensions Administration provider, collect data on key service related performance indicators and cost data which is used for comparisons over time and comparisons with other Funds where possible. Alongside performance discussions, regular monthly performance meetings are also held with LPP to discuss key projects taking place throughout the year and updates such as end of year queries, resourcing, reporting and other administration services.

The key data to confirm value for money is set out on the following pages. In summary this data confirms that the Brent Pension Fund continues to deliver a good quality service which meets the expectations of members of the fund. Overall performance over the last 12 months

was 91.33%. That being said, LPP continued to process a large number of outstanding backlog cases, which had transferred from the previous Pensions Administration provider. Since this backlog has been cleared, performance has regularly achieved the agreed service levels, achieving 98%+.

Summary of Activity

Performance Indicators

The LPP Pensions Administration Service is measured against key performance indicators that measure compliance, efficiency, and effectiveness of the service.

Workflow summary

The table below shows a summary of the total top 10 cases received and completed for the year 1 April 2019 to 31 March 2020.

Staffing

LPP currently has 3.5 FTE working on Brent administration with a ratio of 1 member of staff to 5,642 fund members. The team completed a total of 6,572 cases including other contractual cases outside of the top 10 for the period 1st April 2019 to 31st March 2020 which is an average of 1,878 cases per staff member.

Description – Top 10 Cases	Received	Completed	On Time	On Time %
Joiners	1,479	1,718	1,628	94.76%
Transfer In	278	322	246	76.40%
Transfer Out	416	487	418	85.83%
Estimates - Members	363	393	369	93.89%
Estimates - Employers	119	116	115	99.14%
Retirements	569	599	585	97.66%
Deferred Benefits	712	755	681	90.20%
Refunds	704	822	790	96.11%
Deaths	305	442	316	71.49%
Correspondence	495	575	541	94.09%
Totals	5,440	6,229	5,689	91.33%

Cases completed

Of the 5,866 cases completed on time 2,836 were completed early as detailed below.

Description – Top 10 cases	1 Day Early	2 Days Early	3 Days Early	4+ Days Early
Joiners	143	42	139	684
Transfer In	42	14	14	53
Transfer Out	69	18	11	81
Estimates - Members	71	24	25	67
Estimates - Employers	18	13	13	11
Retirements	74	27	13	88
Deferred Benefits	103	42	28	174
Refunds	128	49	50	192
Deaths	41	21	6	43
Correspondence	91	25	22	67
Totals	780	275	321	1,460

III health and employer consents

Reason	Total
III- Health – Tier 1	2
III Health Tier 2	0
III health Tier 3	1
Flexible Retirement	5
Redundancy	24

Complaints

LPP now have a dedicated complaints team who deal with all complaints. This allows the complaint to be dealt with independently of the administration team and gives consistency when responding to complaints. There was a total of 25 complaints received during the year, broken down by quarter below.

Quarter	Number of complaints
Q1	6
Q2	4
Q3	3
Q4	12
Totals	25

Dispute resolution procedure

There were 3 Dispute resolutions received during the period 1st April 2019 to 31st March 2020.

Where a member is unsure of their benefit entitlement or has problems with their benefits, the Local Pensions Partnership (LPP) should be contacted. If a member is not satisfied with any decision they have a right to ask for it to be re-examined under the formal complaints procedure, which is officially called 'internal dispute resolution procedure'. The formal complaints procedure has 2 stages and full details can be obtained from the LPP by either phone on 01708 952299 or by writing to Local Pensions Partnership, PO Box 1383, Preston, PR2 0WR.

Accuracy of data

Each year, following year-end processing, LPP raise queries with Brent employers such as missing joiners, leavers, change of hours and pay queries. In most instances the queries are reducing year on year, however LPP continue to identify any errors and work with employers prior to the queries being created. To this end, feedback has been received from employers and subsequently, LPP have improved templates and literature to ensure the data supplied by Brent employers is accurate and continues to improve the overall data quality position.

Financial Indicators

Unit Costs per Member

	2018/19	2019/20
Investment Management Expenses		
Total Costs £'000s	3,171	2,449
Total Membership Numbers	21,354	23,138
Cost per member £	148.50	105.84
Administration Expenses		
Total Costs £'000s	1,156	1,147
Total Membership Numbers	21,354	23,138
Cost per member £	54.14	49.57
Oversight and Governance Costs		
Total Costs £'000s	214	287
Total Membership Numbers	21,354	23,138
Cost per member £	10.02	12.40
Total cost per member £	212.65	167.82

The management fees disclosed above include investment management fees directly incurred by the Fund i.e. including those charged on pooled fund investments which tend to be deducted from the market value of the investments rather than invoiced to the Fund. In addition to these costs, indirect costs are incurred through the bid offer spread on investment sales and purchases. These are reflected in the cost of investment acquisitions and in the proceeds from the sales of investments.

Staffing Indicators

The table below shows the number of staff over the last two years in the Pensions Administration Team working exclusively on Local Government pension benefits.

	2018/19	2019/20
Number of full time equivalent staff	8.5	8.8
Total fund membership	21,354	23,138
Number of fund members to one member of administration staff	2,512	2,629

Other Information

Further information regarding analysis of the Brent Pension Fund's membership data and list of contributing employers to the Fund can be found under the Brent Pension Fund Annual Accounts for 19-20.

A summary of the number of employers in the fund analysed by scheduled bodies and admitted bodies which are active (with active members) and ceased (no active members but with some outstanding liabilities) has been provided in the appendix to this report.

For information about the Scheme generally, please see the following contact details:

pensions@brent.gov.uk	For non teachers pension enquiries
tppensions@brent.gov.uk	For teachers pensions enquiries
Returns@brent.gov.uk">Pension>Returns@brent.gov.uk	For all monthly contribution schedules only
askpensions@localpensionspartnership.org.uk	To communicate directly with the LPP

6. Actuarial Information

An actuarial valuation of the Fund is carried out every three years by the Fund's actuary. The most recent actuarial valuation carried out under Regulation 36 of the Local Government Pension Scheme (Administration) Regulations 2008 was as at 31 March 2019.

The purpose of this is to establish that the Brent Pension Fund is able to meet its liabilities to past and present contributors and to review employer contribution rates. The funding objective is to achieve and then maintain assets equal to the funding target. The funding target is the present value of 100% of accrued liabilities.

In summary, the key funding principles are as follows:

- ensure that sufficient resources are available to meet all benefits as they fall due for payment;
- recover any shortfall in assets, relative to the value of accrued liabilities, over broadly the future working lifetime of current employees;
- enable employer contributions to be kept as stable as possible and at reasonable cost; and
- maximise the returns from investments within reasonable risk parameters.

The most recent valuation revealed that the Fund's assets, which at 31 March 2019 were valued at £856m, were sufficient to meet 78% of the £1,104m liabilities (i.e., the present value of promised retirement benefits) accrued up to that date. The resulting deficit at the 2019 valuation was £248m.

During 2019/20, the most commonly applied employer contribution rate within the Brent Pension Fund was 35.0% of pensionable pay. Other employers have different rates of contributions depending on their past experience, their current staff profile, and the recovery period agreed with the Administering Authority.

A summary of the last triennial valuation report and details of the full version of the actuarial report can be obtained below.

<https://www.brent.gov.uk/your-council/transparency-in-brent/performance-and-spending/budgets-and-finance/pensions/>

London Borough of Brent Pension Fund (“the Fund”)

Actuarial Statement for 2019/20

This statement has been prepared in accordance with Regulation 57(1)(d) of the Local Government Pension Scheme Regulations 2013. It has been prepared at the request of the Administering Authority of the Fund for the purpose of complying with the aforementioned regulation.

Description of Funding Policy

The funding policy is set out in the Administering Authority’s Funding Strategy Statement (FSS), dated March 2020. In summary, the key funding principles are as follows:

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

The FSS sets out how the Administering Authority seeks to balance the conflicting aims of securing the solvency of the Fund and keeping employer contributions stable. For employers whose covenant was considered by the Administering Authority to be sufficiently strong, contributions have been stabilised to have a sufficiently high likelihood of achieving the funding target over 19 years. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is at least a 70% likelihood that the Fund will achieve the funding target over 19 years.

Funding Position as at the last formal funding valuation

The most recent actuarial valuation carried out under Regulation 62 of the Local Government Pension Scheme Regulations 2013 was as at 31 March 2019. This valuation revealed that the Fund’s assets, which at 31 March 2019 were valued at £856 million, were sufficient to meet 78% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. The resulting deficit at the 2019 valuation was £248 million.

Each employer had contribution requirements set at the valuation, with the aim of achieving full funding within a time horizon and probability measure as per the FSS. Individual employers’ contributions for the period 1 April 2020 to 31 March 2022 were set in accordance with the Fund’s funding policy as set out in its FSS.

Principal Actuarial Assumptions and Method used to value the liabilities

Full details of the methods and assumptions used are described in the 2019 valuation report.

Method

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

Assumptions

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

The key financial assumptions adopted for the 2019 valuation were as follows:

Financial assumptions	31 March 2019
Discount rate	4.4%
Salary increase assumption	2.6%
Benefit increase assumption (CPI)	2.3%

The key demographic assumption was the allowance made for longevity. The life expectancy assumptions are based on the Fund's VitaCurves with improvements in line with the CMI 2018 model, an allowance for smoothing of recent mortality experience and a long term rate of 1.25% p.a. Based on these assumptions, the average future life expectancies at age 65 are as follows:

	Males	Females
Current Pensioners	22.1 years	24.3 years
Future Pensioners*	23.0 years	25.5 years

*Aged 45 at the 2019 Valuation.

Copies of the 2019 valuation report and Funding Strategy Statement are available on request from the Administering Authority to the Fund.

Experience over the period since 31 March 2019

Markets were disrupted by COVID 19 which resulted in difficult market conditions towards the end of the financial year. As a result, the funding level of the Fund as at 31 March 2020 has reduced versus that reported in the previous formal valuation.

The next actuarial valuation will be carried out as at 31 March 2022. The Funding Strategy Statement will also be reviewed at that time.

Douglas Green FFA

14 May 2020

For and on behalf of Hymans Robertson LLP

7. Governance

Annual Governance Statement

The Local Government Pension Scheme (Amendment) (No 3) Regulations 2007 require the Fund to maintain a Governance Policy Statement.

The Council, as Administering Authority for the Brent Pension Fund, has delegated responsibility for managing the Fund's investments to its Pension Fund Sub-Committee.

The Pension Fund Sub-Committee oversees the proper administration and management of the Pension Fund. It is responsible for:

- undertaking statutory functions on behalf of the Local Government Pension Scheme and ensuring compliance with legislation and best practice
- determining policy for the investment, funding and administration of the Pension Fund
- considering issues arising and making decisions to secure efficient and effective performance and service delivery
- appointing and monitoring all relevant external service providers:
 - fund managers
 - advisers
 - custodian
 - actuary
 - all other professional services associated with the structure and functions of the Pension Fund
- monitoring performance across all aspects of the service
- ensuring that arrangements are in place for consultation with stakeholders as necessary
- considering the annual statement of Pension Fund accounts
- considering and approving the Pension Fund actuarial valuation.

The Pension Fund Sub-Committee normally meets four times each year. These meetings are used mainly for discussions about the Fund's investment management activities, using reports on strategies and performance prepared by the Director of Finance and considering any views of the investment advisers. The Pension Fund Sub-Committee will also consider reports from the Director of Finance, the investment advisers and other consultants as necessary on a range of issues, for example reviews of the Statement of Investment Principles, training, and proposals for scheme change.

Training

Members of the Pension Fund Sub-Committee and Brent officers have opportunities to attend training courses and seminars on pension fund matters, when necessary and appropriate. The cost of attending is charged to the Pension Fund.

Training is delivered in advance of all committee meetings and to ensure that the sessions are effective, topics are usually arranged in line with agenda items.

Training provided in 2019/20 included:

- Responsible Investment (RI) and ESG
- Introduction to the actuarial valuation
- Valuation: Whole fund results
- Implementation of RI and actions
- Hot topics, Governance Framework and Legal Framework

The Fund plans to conduct a training needs analysis in 2020/21 which sets out the various knowledge and understanding requirements for Committee and Board members and indicates the various methods available to deliver each.

Use of advisers

The Director of Finance and Head of Finance advise the Pension Fund Sub-Committee on all Pension Fund investment and administrative matters.

The Fund's Investment advisor advises the Pension Fund Sub-Committee on investment matters.

The Pension Fund Sub-Committee uses the Fund's actuary, Hymans Robertson, and other consultants as necessary, for advice on matters when in-house expertise is not available. The Pension Fund Sub-Committee takes advice from the actuary, the fund managers or specialist consultants or advisers as required on asset allocation, selecting managers, and investment performance targets.

Communications with Fund employers and members

Each financial year, an annual report on the Fund is prepared for the Fund's employers. The report covers the Fund's accounts, investment arrangements and policy, investment performance, scheme changes and other issues of current interest.

Annual benefit statements are provided to contributors and deferred pensioners, together with an annual newsletter to pensioners.

Governance Compliance Statement

This statement shows how Brent Council as the Administering Authority of the Brent Pension Fund complies with guidance on the governance of the Local Government Pension Scheme (LGPS) issued by the Secretary of State for Communities and Local Government in accordance with the Local Government Pension Scheme (Administration) Regulations 2008.

Ref.	Principles	Compliance and comments
A	Structure	
a.	That the management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Full compliance. Brent Council's constitution sets out the terms of reference for the Pension Fund Sub-Committee.
b.	That representatives of participating LGPS employers, admission bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Full compliance.
c.	That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	No formal secondary committees or panels have been established.
d.	That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.	No formal secondary committees or panels have been established.
B	Representation	
a.	That all key stakeholders have the opportunity to be represented within the main or secondary committee structure. These include: <ul style="list-style-type: none"> i) employing authorities (including non-scheme employers, e.g. admission bodies) ii) scheme members (including deferred and pensioner scheme members) iii) where appropriate, independent professional observers, and iv) expert advisers (ad-hoc basis only). 	Full compliance. The Pension Fund Sub-Committee includes a representative of the other employers in the Fund and contributor members. The Fund's independent adviser attends Pension Fund Sub-Committee meetings. Independent professional observers are not regarded as appropriate.
b.	That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers, meetings, and training and are given full opportunity to contribute to the decision-making process, with or without voting rights.	Full compliance. Equal access is provided to all members of the Pension Fund Sub-Committee.
C	Selection and role of lay members	
a.	That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.	Full compliance.
D	Voting	
a.	That the individual administering authorities on voting rights are clear and transparent, including	Full compliance. All representatives on the Pension Fund Sub-Committee

Ref.	Principles	Compliance and comments
	the justification for not extending voting rights to each body or group represented on main LGPS committees.	have full voting rights, but the Sub-Committee works by consensus without votes being required.
E	Training/facility time/expenses	
a.	That in relation to the way in which the administering authority takes statutory and related decisions, there is a clear policy on training, facility time and reimbursement of expenses for members involved in the decision-making process.	Full compliance. Full training and facilities are made available to all members of the Pension Fund Sub-Committee.
b.	That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.	Full compliance.
c.	That the administering authority considers adopting annual training plans for committee members and maintains a log of all such training undertaken.	Full compliance. A training plan has been prepared for the Pension Fund Sub-Committee and training logs are maintained for all such training undertaken.
F	Meetings (frequency/quorum)	
a.	That an administering authority's main committee or committees meet at least quarterly.	Full compliance. The Pension Fund Sub-Committee meets regularly throughout the year. Additional meetings can be arranged to fit its business needs.
b.	That an administering authority's secondary committee or panel meets at least twice a year and is synchronised with the dates when the main committee sits.	No formal secondary committees or panels have been established.
c.	That an administering authority that does not include lay members in its formal governance arrangements must provide a forum outside of those arrangements to represent the interests of key stakeholders.	Full compliance. The Pension Fund Sub-Committee includes lay members. Road shows are arranged for employers.
G	Access	
a.	That, subject to any rules in the Council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that are due to be considered at meetings of the main committee.	Full compliance. Equal access is provided to all members of the Pension Fund Sub-Committee.
H	Scope	
a.	That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Full compliance. The Pension Fund Sub-Committee deals with fund administration issues as well as fund investment.

Ref.	Principles	Compliance and comments
I	Publicity	
a.	That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in how the scheme is governed can say they want to be part of those arrangements.	Full compliance. The Council's Governance Policy Statement is published in the Pension Fund's Annual Report and on its website.

8. Brent Pension Accounts

Brent Pension Fund Accounts

Pension Fund Accounts as at 31 March 2020

2018/19 £m		Notes	2019/20 £m
	Dealings with members, employers and others directly involved in the fund		
(52.1)	Contributions	7	(60.0)
(2.8)	Transfers in from other pension funds	8	(5.2)
(54.9)			(65.2)
45.9	Benefits	9	47.9
1.8	Payments to and on account of leavers	10	6.2
47.7			54.2
(7.2)	Net (additions)/withdrawals from dealings with members		(11.1)
6.8	Management expenses	11	3.8
(0.4)	Net (additions)/withdrawals including management expenses		(7.3)
	Returns on investments		
(1.4)	Investment income	12	(1.2)
0.0	Taxes on income	13	0.0
(61.7)	(Profits) and losses on disposal of investments and changes in the market value of investments	14	34.1
(63.1)	Net return on investments		32.9
(63.5)	Net (increase)/decrease in the net assets available for benefits during the year		25.6
(801.1)	Opening net assets of the scheme		(864.6)
(864.6)	Closing net assets of the scheme		(839.0)

Net Assets Statement

31 March 2019 £m		Notes	31 March 2020 £m
856.4	Investment assets	14	835.3
856.4			835.3
9.1	Current assets	20	4.0
0.0	Non-current assets		0.0
(0.9)	Current liabilities	21	(0.4)
864.6	Net assets of the fund available to fund benefits at the period end		839.0

The net asset statement includes all assets and liabilities of the Fund as at 31 March 2020 but excludes long-term liabilities to pay pensions and benefits in future years. The actuarial present value of promised retirement benefits is disclosed in Note 19.

Notes to the Brent Pension Fund accounts

1. Description of Fund

The Brent Pension Fund (the 'Fund') is part of the Local Government Pension Scheme, and is administered by Brent Council.

The following description of the Fund is a summary only.

a) General

The Fund is a contributory defined benefit pension scheme administered by Brent Council to provide pensions and other benefits for pensionable employees of Brent Council and a range of other scheduled and admitted bodies.

b) Membership

Membership of the LGPS is voluntary and employees are free to choose whether to join the scheme, remain in the scheme or make their own personal arrangements outside the scheme. Organisations participating in the Brent Pension Fund include:

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

There were 40 employer organisations with active members within the Brent Pension Fund at 31 March 2020, listed below:

Scheduled bodies

London Borough of Brent
Alperton Community School
ARK Academy
ARK Elvin Academy
ARK Franklin Academy
Braintcroft Primary School
Capital City Academy
Claremont High School Academy
Compass Learning Partnership
Convent of Jesus & Mary Language College
Crest Academy
Furness Primary School
Gladstone Park Primary School
Kingsbury High School
Manor School
Michaela Community School
North West London Jewish Day School
Oakington Manor Primary School
Our Lady of Grace RC Infants School
Our Lady of Grace RC Juniors School
Preston Manor High School
Queens Park Community School
St Andrews and St Francis School
St Gregory's RC High School
St Margaret Clitherow
Sudbury Primary School

The Village School
Wembley High Technology College
Woodfield School Academy

Admitted bodies

Apleona HSG Ltd (previously Bilfinger originally Europa Facility (Services Limited))
Barnardos
Caterlink
Conway Aecom
Local Employment Access Project (LEAP)
National Autistic Society (NAS)
Ricoh UK
Sudbury Neighbourhood Centre
Taylor Shaw
Veolia
Veolia (Ground Maintenance)

31 March 2019	Brent Pension Fund	31 March 2020
36	Number of employers with active members	40
	Number of employees in scheme	
5,209	Brent Council	5,239
1,547	Other employers	1,834
6,756	Total	7,073
	Number of pensioners	
6,193	Brent Council	6,320
537	Other employers	666
6,730	Total	6,986
	Deferred pensioners	
7,053	Brent Council	6,975
815	Other employers	935
7,868	Total	7,910

c) Funding

Benefits are funded by contributions and investment earnings. Contributions are made by active members of the Fund in accordance with the LGPS (Benefits, Membership and Contributions) Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ending 31 March 2020. Employee contributions are matched by employers' contributions which are set based on triennial actuarial funding valuations. The last such valuation was at 31 March 2019. During 2019/20, the most commonly applied employer contribution rate within the Brent Pension Fund was 35.0% of pensionable pay.

d) Benefits

Since April 2014, the scheme is a career average scheme, whereby members accrue benefits based on their pensionable pay in that year at an accrual rate 1/49th. Accrued pension is updated annually in line with the Consumer Price index.

For a summary of the scheme before April 2014 and details of a range of other benefits provided under the scheme including early retirement, disability pensions and death benefits, please refer to the LGPS website: www.lgpsmember.org

2. Basis of preparation

The Statement of Accounts summarises the Fund's transactions for the 2019/20 financial year and its position at year-end as at 31 March 2020. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector.

The accounts summarise the transactions of the Fund and report on the net assets available to pay pension benefits. The accounts do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year. The actuarial present value of promised retirement benefits, valued on an International Accounting Standard (IAS) 19 basis, is disclosed at Note 19 of these accounts.

3. Summary of significant accounting policies

Fund Account – revenue recognition

a) Contribution income

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

Employers' augmentation contributions and pensions strain contributions are accounted for in the period in which the liability arises. Any amount due in year but unpaid will be classed as a current financial asset. Amounts not due until future years are classed as long-term financial assets.

b) Transfers to and from other schemes

Transfer values represent the amounts received and paid during the year for members who have either joined or left the Fund during the financial year and are calculated in accordance with the Local Government Pension Scheme Regulations (see Notes 8 and 10).

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

Transfers in from members wishing to use the proceeds of their additional voluntary contributions (see section n below) to purchase scheme benefits are accounted for on a receipts basis and are included in Transfers In (see Note 8).

Bulk (group) transfers are accounted for on an accruals basis in accordance with the terms of the transfer agreement.

c) Investment income

i) Interest income

Interest income is recognised in the Fund Account as it accrues, using the effective interest rate of the financial instrument as at the date of acquisition or origination. Income includes the amortisation of any discount or premium, transaction costs or other differences between the initial carrying amount of the instrument and its amount at maturity calculated on an effective interest rate basis.

ii) Dividend income

Dividend income is recognised on the date the shares are quoted ex-dividend. Any amount

not received by the end of the reporting period is disclosed in the Net Assets Statement as a current financial asset.

iii) **Distributions from pooled funds**

Distributions from pooled funds are recognised at the date of issue. Any amount not received by the end of the reporting period is disclosed in the Net Assets Statement as a current financial asset.

iv) **Movement in the net market value of investments**

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

Fund Account – expense items

d) Benefits payable

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

e) Taxation

The Fund is a registered public service scheme under section 1(1) of Schedule 36 of the Finance Act 2004 and as such is exempt from UK income tax on interest received and from capital gains tax on the proceeds of investments sold. Income from overseas investments suffers withholding tax in the country of origin, unless exemption is permitted. Irrecoverable tax is accounted for as a Fund expense as it arises.

f) Administration expenses

All administration expenses are accounted for on an accruals basis. All staff costs of the pensions' administration team are charged direct to the Fund. Management, accommodation and other overheads are apportioned to the Fund in accordance with Council policy.

g) Investment management expenses

All investment management expenses are accounted for on an accruals basis. Fees of the external investment managers are agreed in the respective mandates governing their appointments. Broadly, these are based on the market value of the investments under their management and therefore increase or reduce as the value of these investments change.

The cost of obtaining investment advice from external consultants is included in investment management charges.

Net Assets Statement

h) Financial assets

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

The values of investments as shown in the Net Assets Statement have been determined as follows:

i) **Market-quoted investments**

The value of an investment for which there is a readily available market price is determined

by the bid market price ruling on the final day of the accounting period.

ii) Fixed interest securities

Fixed interest securities are recorded at net market value based on their current yields.

iii) Unquoted investments

The fair value of investments for which market quotations are not readily available is determined as follows:

- Valuations of delisted securities are based on the last sale price prior to delisting, or where subject to liquidation, the amount the Fund expects to receive on wind-up, less estimated realisation costs.
- Securities subject to takeover offer – the value of the consideration offered under the offer, less estimated realisation costs.
- Directly held investments include investments in limited partnerships, shares in unlisted companies, trusts and bonds. Other unquoted securities typically include pooled investments in property, infrastructure, debt securities and private equity. The valuation of these pools or directly held securities is undertaken by the investment manager or responsible entity and advised as a unit or security price. The valuation standards followed in these valuations adhere to industry guidelines or to standards set by the constituent documents of the pool or the management agreement.
- Investments in unquoted property and infrastructure pooled funds are valued at the net asset value or a single price advised by the fund manager.
- Investments in private equity/infrastructure funds and unquoted listed partnerships are valued based on the Fund's share of the net assets in the private equity/infrastructure fund or limited partnership using the latest financial statements published by the respective fund managers in accordance with the guidelines set out by the British Venture Capital Association.

iv) Limited partnerships

Fair value is based on the net asset value ascertained from periodic valuations provided by those controlling the partnership.

v) Pooled investment vehicles

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

i) Contingent Assets

Admitted body employers in the Brent Pension Fund hold bonds to guard against the possibility of being unable to meet their pension obligations. These bonds are drawn in favour of the pension fund and payment will only be triggered in the event of employer default. Contingent Assets are disclosed in Note 25.

j) Foreign currency transactions

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

k) Derivatives

The Fund does not use derivative financial instruments to manage its exposure to specific risks arising from its investment activities in its own name. Neither does it hold derivatives for

speculative purposes.

l) Cash and cash equivalents

Cash comprises cash in hand and demand deposits.

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

m) Financial liabilities

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

n) Actuarial present value of promised retirement benefits

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

As permitted under IAS 26, the Fund has opted to disclose the actuarial present value of promised retirement benefits by way of a note to the Net Assets Statement (Note 19).

o) Additional voluntary contributions

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

AVCs are not included in the accounts in accordance with Section 4(1)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (SI 2016/946) but are disclosed as a note only (Note 22).

4. Critical judgements in applying accounting policies

Unquoted private equity/infrastructure investments

It is important to recognise the highly subjective nature of determining the fair value of private equity investments. They are inherently based on forward-looking estimates and judgements involving many factors. Unquoted private equities and infrastructure investments are valued by the investment managers using guidelines set out by the British Venture Capital Association. The value of unquoted private equities and infrastructure investments at 31 March 2020 was £84m (£95m at 31 March 2019).

Pension fund liability

The pension fund liability is calculated every three years by the appointed actuary, with annual updates in the intervening years. The methodology used is in line with accepted guidelines and in accordance with IAS 19. Assumptions underpinning the valuations are agreed with the

actuary and are summarised in Note 19. This estimate is subject to significant variances based on changes to the underlying assumptions.

5. Assumptions made about the future and other major sources of estimation uncertainty

The Statement of Accounts contains estimated figures that are based on assumptions made by the Council about the future or that are otherwise uncertain. Estimates are made taking into account historical experience, current trends and other relevant factors. However, because balances cannot be determined with certainty, actual results could be materially different from the assumptions and estimates.

The items in the Net Assets Statement at 31 March 2020 for which there is a significant risk of material adjustment in the forthcoming financial year are as follows:

Item	Uncertainties	Effect if actual results differ from assumptions
Actuarial present value of promised retirement benefits (Note 19)	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. A firm of consulting actuaries is engaged to provide the Fund with expert advice about the assumptions to be applied.	The effects on the net pension liability of changes in individual assumptions can be measured. For instance, a 0.5% increase in the discount rate assumption would result in a decrease in the pension liability of approximately £136m. A 0.5% increase in assumed earnings inflation would increase the value of liabilities by approximately £8m, and a one-year increase in assumed life expectancy would increase the liability by approximately 3 to 5%.
Private equity/infrastructure	Private equity/infrastructure investments are valued at fair value using recognised valuation techniques. These investments are not publicly listed and as such, there is a degree of estimation involved in the valuation.	The total private equity/infrastructure investments in the financial statements are £84m. There is a risk that this investment may be under- or overstated in the accounts.
Effect of Coronavirus pandemic on investment valuations	Due to the uncertainties in the financial markets caused by the current Coronavirus pandemic, there is an increased risk that the valuation of the Fund's level 3 investments may be affected and the valuations may be mis-stated. The Fund's private equity and infrastructure investments are usually valued in the accounts based on the 31st	There is a risk that this investment may be under- or overstated in the accounts. The Fund's investment advisors estimate this to be up +/- 24.3% of the reported value. Further detail is provided in note 17.

	December valuations, with adjustments to roll forward cashflows to 31st March as appropriate and therefore do not fully take into account the impact of the Covid-19 pandemic.	
McCloud Ruling	The “McCloud judgment” refers to a legal challenge in relation to historic benefit changes for all public sector schemes. The courts have ruled that the ‘transitional protections’ awarded to some members of public service pension schemes when the schemes were reformed (on 1 April 2014 in the case of the LGPS and Brent Pension Fund) were unlawful on the grounds of age discrimination. This will increase the liabilities of the Fund however the exact size of such liability is unknown. However, the IAS19 valuation included in London Borough of Brent’s accounts do include an estimated allowance for McCloud.	There is a risk that the estimate of the McCloud additional liabilities may be over or understated in these accounts.

6. Events after the Reporting Date

There have been no events since 31 March 2020, and up to the date when these accounts were authorised that require any adjustments to these accounts.

7. Contributions receivable

By category

	2018/19	2019/20
	£m	£m
Employees’ contributions	9.2	8.5
Employers’ contributions:		
Normal contributions	39.7	45.6
Deficit recovery contributions	1.7	1.7
Augmentation contributions	1.5	4.3
Total employers’ contributions	42.9	51.5
Total	52.1	60.0

By authority

	2018/19	2019/20
	£m	£m
Administering Authority	42.0	47.8
Scheduled bodies	8.5	10.3

Admitted bodies	1.6	1.8
Total	52.1	60.0

8. Transfers in from other pension funds

	2018/19 £m	2019/20 £m
Individual transfers	2.8	5.2
Total	2.8	5.2

9. Benefits payable

By category

	2018/19 £m	2019/20 £m
Pensions	37.7	38.6
Commutation and lump sum retirement benefits	7.1	8.5
Lump sum death benefits	1.1	0.8
Total	45.9	47.9

By authority

	2018/19 £m	2019/20 £m
Administering Authority and Scheduled bodies	44.1	47.4
Admitted bodies	1.8	0.5
Total	45.9	47.9

10. Payments to and on account of leavers

	2018/19 £m	2019/20 £m
Individual transfers	1.8	5.9
Refunds to members leaving service	0.1	0.3
Group transfers	(0.1)	0.0
Total	1.8	6.2

11. Management Expenses

	2018/19 £m	2019/20 £m
Administration costs	1.2	1.1
Investment management expenses	3.2	2.4
Oversight and Governance costs	0.2	0.3
Other expenses	2.2	0.0
Total	6.8	3.8

The management fees disclosed above include all investment management fees directly incurred by the Fund including those charged on pooled fund investments. Audit fees were £25k (£16.1k 2018/19).

a) Investment management expenses

	2018/19	2019/20
	£m	£m
Management fees	2.7	2.3
Custody fees	0.1	0.0
One-off transaction costs	0.4	0.0
Total	3.2	2.3

Transaction costs are incremental costs that are directly attributable to the acquisition, issue or disposal of a financial liability {see Appendix A, paragraph AG13 of IAS 39}. An incremental cost is one that would not have been incurred if the authority had not acquired, issued or disposed of the financial instrument.

12. Investment income

	2018/19	2019/20
	£m	£m
Dividend income private equities/infrastructure	0.2	0.5
Income from Pooled property investments	0.5	0.1
Income from private equities/infrastructure	0.2	0.3
Interest on cash deposits	0.5	0.3
Total	1.4	1.2

13. Taxes on income

	2018/19	2019/20
	£m	£m
Withholding tax	0.0	0.0
Total	0.0	0.0

14. Investments

	Market value 31 March 2019	Market value 31 March 2020
	£m	£m
Investment assets		
Pooled investments	737.7	697.0
Pooled property investments	0.2	0.1
Private equity/infrastructure	95.0	84.3
Total investments	832.9	781.4

14a) Investments 19/20

	Market value 1 April 2019	Purchases during the year	Sales during the year	Change in market value during the year	Market value 31 March 2020
	£m	£m	£m	£m	£m
Pooled investments	737.7	0.0	(1.2)	(39.5)	697.0
Pooled property investments	0.2	0.0	(3.3)	3.2	0.1
Private equity/infrastructure	95.0	3.2	(16.1)	2.2	84.3
	832.9	3.2	(20.6)	(34.1)	781.4
Other investment balances: Cash Deposit	23.5				53.9
Investment income due	0.0				0.0
Net investment assets	<u>856.4</u>				<u>835.3</u>

Investments 18/19

	Market value 1 April 2018	Purchases during the year	Sales during the year	Change in market value during the year	Market value 31 March 2019
	£m	£m	£m	£m	£m
Pooled investments	636.9	181.9	(122.0)	40.9	737.7
Pooled property investments	2.1	0.0	(1.4)	(0.5)	0.2
Private equity/infrastructure	98.3	6.2	(30.8)	21.3	95.0
	737.3	188.1	(154.2)	61.7	832.9
Other investment balances: Cash Deposit	94.0				23.5
Investment income due	0.0				0.0
Net investment assets	<u>831.3</u>				<u>856.4</u>

14b) Analysis of investments by category

	31 March 2019 £m	31 March 2020 £m
Pooled funds - additional analysis		
UK		
Fixed income unit trust	35.5	30.6
Unit trusts	224.6	212.1
Diversified growth funds	170.1	160.9
Overseas		
Unit trusts	307.5	293.4
Total Pooled funds	737.7	697.0
Pooled property investments	0.2	0.1
Private equity/infrastructure	95.0	84.3
Total investments	832.9	781.4

14c) Investments analysed by fund manager

			Market value	
31 March 2019			31 March 2020	
£m	%		£m	%
422.9	50.8%	Legal & General	387.5	49.6%
0.2	0.0%	London CIV	0.2	0.0%
30.3	3.6%	Janus Henderson	0.0	0.0%
0.0	0.0%	JP Morgan	25.2	3.2%
69.4	8.3%	Capital Dynamics	59.2	7.6%
0.0	0.0%	Yorkshire Fund Managers	0.0	0.0%
121.5	14.6%	LCIV - Baillie Gifford	110.8	14.2%
48.6	5.8%	LCIV - Ruffer	50.1	6.4%
35.5	4.3%	LCIV- MAC (CQS)	30.6	3.9%
0.0	0.0%	LCIV - Infrastructure	0.5	0.1%
0.2	0.0%	Aviva	0.1	0.0%
25.6	3.1%	Alinda	24.6	3.1%
78.7	9.4%	Blackrock	92.6	11.9%
832.9	100.0		781.4	100.0

The following investments represent over 5% of the net assets of the fund. All of these companies are registered in the United Kingdom.

Security	Market value 31 March 2020	% of total fund	Market value 31 March 2019	% of total fund
L&G - Global Equities	293.4	35.1%	307.5	35.9%
L&G - UK Equities	94.1	11.3%	115.4	13.5%
Blackrock - Over 15 year Gilts	92.6	11.1%	78.7	9.2%
LCIV - Baillie Gifford DGF	110.8	13.3%	121.5	14.2%
LCIV - Ruffer DGF	50.1	6.0%	48.6	5.7%
Capital Dynamics - Private Equity	49.1	5.9%	58.0	6.8%
Cash	53.9	6.5%	23.5	2.7%

d) Stock lending

The London Borough of Brent Pension Fund does not operate a Stock Lending programme.

15a. Valuation of financial instruments carried at fair value

The basis of the valuation of each asset class of investment asset is set out below. There has been no change in the valuation techniques used during the year. All assets have been valued using fair value techniques which represent the highest and best price available at the reporting date.

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Market quoted investments	Level 1	Published bid market price ruling on the final day of the accounting period	Not required	Not required
Quoted bonds	Level 1	Fixed interest securities are valued at a market value based on current yields	Not required	Not required
Pooled investments – overseas unit trusts and property funds	Level 2	Closing bid price where bid and offer prices are published. Closing single price where single price published	NAV-based pricing set on a forward pricing basis	Not required
Unquoted equity	Level 3	Comparable valuation of similar companies in	EBITDA multiple Revenue multiple	Valuations could be affected by material events occurring between the date of

		accordance with International Private Equity and Venture Capital Valuation Guidelines (2012)	Discount for lack of marketability Control premium	the financial statements provided and the pension fund's own reporting date, by changes to expected cash flows, and by any differences between audit and unaudited accounts
--	--	--	--	---

Sensitivity of assets valued at Level 3

Having analysed historical data and current market trends, and consulted with our independent investment advisor, the fund has determined that the valuation methods described above are likely to be accurate to within the following ranges, and has set out below the consequent potential impact on the closing value of investments held at 31 March 2020.

	Assessed valuation range (+/-)	Value at 31 March 2020	Value on increase	Value of decrease
		£m	£m	£m
Private equity/ Infrastructure	24.3%	84.3	104.7	63.9

15b. Fair value hierarchy

The valuation of financial instruments had been classified into three levels, according to the quality and reliability of information used to determine fair values. Transfers between levels are recognised in the year in which they occur.

Level 1

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

Listed investments are shown at bid prices. The bid value of the investment is based on the bid market quotation of the relevant stock exchange.

Level 2

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

Level 3

Financial instruments at Level 3 are those where at least one input that could have a significant effect on the instrument's valuation is not based on observable market data.

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

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

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

Transfers between levels will be recognised when there has been a change to observable mark data (improvement or reduction) or other change in valuation technique.

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

Values at 31 March 2020	Quoted market price Level 1 £'000	Using observable inputs Level 2 £'000	With significant unobservable inputs Level 3 £'000	Total £'000
Financial assets				
Financial assets at fair value through profit and loss	0.0	697.1	84.3	781.4
Loans and receivables	53.9	0.0	0.0	53.9
Total Financial assets	53.9	697.1	84.3	835.3
Financial liabilities				
Financial liabilities at amortised cost	(0.4)	0.0	0.0	(0.4)
Total Financial liabilities	(0.4)	0.0	0.0	(0.4)
Net Financial assets	53.5	697.1	84.3	834.9

Values at 31 March 2019	Quoted market price	Using observable inputs	With significant unobservable inputs	Total
	Level 1	Level 2	Level 3	
	£m	£m	£m	£m
Financial assets				
Financial assets at fair value through profit and loss	0.0	737.9	95.0	832.9
Loans and receivables	23.5	0.0	0.0	23.5
Total Financial assets	23.5	737.9	95.0	856.4
Financial liabilities				
Financial liabilities at amortised cost	(0.9)	0.0	0.0	(0.9)
Total Financial liabilities	(0.9)	0.0	0.0	(0.9)
Net Financial assets	22.6	737.9	95.0	855.5

15c. Transfers between Levels 1 and 2

There were no transfers between levels 1 and 2 during the year

15d. Reconciliation of Fair Value Measurements within Level 3

	£m
Value at 31 March 2019	95.0
Transfers into Level 3	0
Transfers out of Level 3	0
Purchases	3.2
Sales	(16.1)
Issues	0
Settlements	0
Unrealised gains/losses	0
Realised gains/losses	2.2
Value at 31 March 2020	84.3

16. Classification of financial instruments

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

Fair value through profit and loss	31 March 2019		Financial liabilities at amortised cost	Fair value through profit and loss	31 March 2020	
	Loans and receivables	Financial liabilities at amortised cost			Loans and receivables	Financial liabilities at amortised cost
£'000	£'000	£'000		£'000	£'000	£'000
			Financial assets			
737.7			Pooled investments	697.0		
0.2			Pooled property investments	0.1		
95.0			Private equity/infrastructure	84.3		
	23.5		Cash		53.9	
	9.1		Debtors		4.0	
832.9	32.6	0.0	Total Financial assets	781.4	57.9	0.0
			Financial liabilities			
		(0.9)	Creditors			(0.4)
0	0	(0.9)	Total Financial liabilities	0	0	(0.4)
832.9	32.6	(0.9)	Net Financial assets	781.4	57.9	(0.4)

a) Net gains and losses on financial instruments

31 March 2019		31 March 2020
£m		£m
	Financial assets	
61.7	Fair value through profit and loss	(34.1)
61.7	Total	(34.1)

b) Fair value of financial instruments and liabilities

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

31 March 2019		31 March 2020	
Carrying Value	Fair Value	Carrying Value	Fair Value
£'000	£'000	£'000	£'000
Financial assets			
832.9	832.9	781.4	781.4
32.6	32.6	57.9	57.9
865.5	865.5	839.3	839.3
Financial liabilities			
(0.9)	(0.9)	(0.4)	(0.4)
(0.9)	(0.9)	(0.4)	(0.4)

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

17. Nature and extent of risks arising from financial instruments

Risk and risk management

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

Responsibility for the Fund's risk management strategy rests with the Pension Fund Sub-Committee. Risk management policies are established to identify and analyse the risks faced by the Pension Fund's operations. Policies are reviewed regularly to reflect changes in activity and in market conditions.

a) Market risk

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

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

In general, excessive volatility in market risk is managed through the diversification of the

portfolio in terms of geographical and industry sectors and individual securities. To mitigate market risk, the Pension Fund and its investment advisers undertake appropriate monitoring of market conditions and benchmark analysis.

Other price risk

Other price risk represents the risk that the value of a financial instrument will fluctuate as a result of changes in market prices (other than those arising from interest rate risk or foreign exchange risk), whether those changes are caused by factors specific to the individual instrument or its issuer or factors affecting all such instruments in the market.

The Fund is exposed to share and derivative price risk. This arises from investments held by the Fund for which the future price is uncertain. All securities investments present a risk of loss of capital. Except for shares sold short, the maximum risk resulting from financial instruments is determined by the fair value of the financial instruments. Possible losses from shares sold short are unlimited.

The Fund's investment managers mitigate this price risk through diversification and the selection of securities and other financial instruments is monitored by the Pension Fund to ensure it is within limits specified in the Fund investment strategy.

Other price risk – sensitivity analysis

Following analysis of historical data and expected investment return movement during the financial year, in consultation with the fund's investment advisers, the council has determined that the following movements in market price risk are reasonably possible for the 2019/20 reporting period. (based on data as at 31 March 2020 using data provided by investment advisers scenario model). The sensitivities are consistent with the assumptions contained in the investment advisers' most recent review. Some of these sensitivities have risen significantly compared to last year. This reflects the prevailing volatility in the markets since the global outbreak of coronavirus. This analysis assumes that all other variables, in particular foreign currency exchange rates and interest rates, remain the same.

Other price risk – sensitivity analysis

Asset Type	31/03/2020 Value (£m)	Potential market movements (+/-)
Bonds	123.2	7.6%
Equities	412.9	26.3%
Other Pooled investments	160.9	13.0%
Pooled Property investments	0.1	14.2%
Private Equity/Infrastructure	84.3	24.3%

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

Asset Type	31/03/2020 Value	Potential value on increase	Potential value on decrease
Bonds	123.2	132.6	113.8
Equities	412.9	521.5	304.3
Other Pooled investments	160.9	181.8	140.0
Pooled Property investments	0.1	0.1	0.1
Private Equity/Infrastructure	84.3	104.7	63.9
Total	781.4	940.7	622.1

Interest rate risk exposure asset type

The Fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments are subject to interest rate risks, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The Fund's interest rate risk is routinely monitored by the Pension Fund in accordance with the Fund's risk management strategy, including monitoring the exposure to interest rates and assessment of actual interest rates against the relevant benchmarks.

The Fund's direct exposure to interest rate movements as at 31 March 2019 and 31 March 2020 is set out below. These disclosures present interest rate risk based on the underlying financial assets at fair value:

	31 March 2019	31 March 2020
	£m	£m
Cash balances	23.5	53.9
UK Fixed income unit trust	35.5	30.6
Total	59.0	84.5

Asset type	Carrying amount as at 31 March 2020	Change in year in the net assets available to pay benefits	
		+100 BPS	-100 BPS
	£m	£m	£m
Cash balances	53.9	0.5	(0.5)
UK Fixed income unit trust	30.6	0.3	(0.3)
Total change in assets available	84.5	0.8	(0.8)

Asset type	Carrying amount as at 31	Change in year in the net assets available to pay benefits	
-------------------	---	---	--

	March 2019		
	£m	+100 BPS £m	-100 BPS £m
Cash balances	23.5	0.2	(0.2)
UK Fixed income unit trust	35.5	0.4	(0.4)
Total change in assets available	59.0	0.6	(0.6)

Currency risk

Currency risk represents the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The Fund is exposed to currency risk on financial instruments that are denominated in any currency other than the functional currency of the Fund (£UK). The Fund holds both monetary and non-monetary assets denominated in currencies other than £UK.

The Fund's currency rate risk is routinely monitored by the Pension Fund in accordance with the Fund's risk management strategy, including monitoring the range of exposure to currency fluctuations.

The following table summarises the Fund's currency exposure as at 31 March 2020 and as at the previous period end:

Currency risk exposure – asset type	Asset value at 31 March 2019 £m	Asset value at 31 March 2020 £m
Overseas unit trusts	307.5	293.4
Overseas pooled property investments	0.2	0.1
Overseas private equity/infrastructure	95.0	84.3
Total overseas assets	402.7	377.8

A 1% strengthening/weakening of the pound against the various currencies in which the Fund holds investments would increase/decrease the net assets available to pay benefits as follows:

	Asset value as at 31 March 2020 £m	Change to net assets available to pay benefits	
		+1% £m	-1% £m
Overseas unit trusts	293.4	2.9	(2.9)
Overseas pooled property investments	0.1	0.0	(0.0)
Overseas private equity/infrastructure	84.3	0.8	(0.8)
Total change in assets available	377.8	3.8	(3.8)

	Asset value as at 31 March 2019	Change to net assets available to pay benefits	
		+1%	-1%
	£m	£m	£m
Overseas unit trusts	307.5	3.1	(3.1)
Overseas pooled property investments	0.2	0.0	(0.0)
Overseas private equity/infrastructure	95.0	1.0	(1.0)
Total change in assets available	402.7	4.0	(4.0)

b) Credit risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the Fund's financial assets and liabilities.

In essence, the Fund's entire investment portfolio is exposed to some form of credit risk. However, the selection of high quality counterparties, brokers and financial institutions minimises credit risk that may occur through the failure to settle a transaction in a timely manner.

The Pension Fund's cash balance is held in an interest bearing instant access deposit account with NatWest plc, which is rated independently and meets Brent Council's credit criteria.

The Pension Fund believes it has managed its exposure to credit risk, and has had no experience of default or uncollectable deposits over the past five financial years. The Fund's cash holding under its treasury management arrangements at 31 March 2020 was £54.0m (31 March 2019: £23.5m). This was held with the following institutions:

	Rating	Balances as at 31 March 2019	Balances as at 31 March 2020
		£m	£m
Bank deposit accounts			
NatWest	BBB+	1.1	0.8
Northern Trust		3.3	0.1
Money Market deposits	A+	19.1	53.1
Other short-term lending			
Local authorities		0.0	0.0
Total		23.5	54.0

c) Liquidity risk

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

The Pension Fund has immediate access to its cash holdings.

The Fund defines liquid assets as assets that can be converted to cash within three months. Illiquid assets are those assets which will take longer than three months to convert into cash. At 31 March 2020 the value of illiquid assets was £84.4m, which represented 10% (31 March 2019: £95.2m, which represented 11%) of the total fund assets.

Periodic cash flow forecasts are prepared to understand and manage the timing of the Fund's cash flows. The appropriate strategic level of cash balances to be held forms part of the Fund investment strategy.

All financial liabilities at 31 March 2020 are due within one year.

d) Refinancing risk

The key risk is that the Pension Fund will be bound to replenish a significant proportion of its financial instruments at a time of unfavourable interest rates. However, the Pension Fund does not have any financial instruments that have a refinancing risk as part of its treasury management and investment strategies.

18. Funding arrangements

In line with the LGPS (Administration) Regulations 2008, the Fund's actuary undertakes a funding valuation every three years for the purpose of setting employer contribution rates for the forthcoming triennial period. The last such valuation took place as at 31 March 2019. The next valuation will take place as at March 2022.

The key elements of the funding policy are:

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

The aim is to achieve 100% solvency over a period of 19 years from 1 April 2019 and to provide stability in employer contribution rates by spreading any increases in rates over a period of time. Solvency is achieved when the funds held, plus future expected investment returns and future contributions are sufficient to meet expected future pension benefits payable.

At the 2019 actuarial valuation, the Fund was assessed as 78% funded, which is a significant improvement to the 55% valuation at the 2016 valuation. This corresponded to a deficit of £248m (2016 valuation: £562m) at that time. As a result, a deficit recovery plan is in place which aims to achieve 100% funding over a period of 19 years from April 2019.

Contribution increases or decreases may be phased in over the three-year period beginning 31 March 2020 for both Scheme employers and admitted bodies. The most commonly applied employer contribution rate within the Brent Pension Fund is:

Year	Employers' contribution rate
2018/19	33.8%
2019/20	35.0%
2020/21	35.0%

Individual employers' rates will vary from the common contribution rate depending on the demographic and actuarial factors particular to each employer. Full details of the contribution rates payable can be found in the 2019 actuarial valuation report and the funding strategy statement on the Fund's website.

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

The main actuarial assumptions used for the March 2019 actuarial valuation were as follows:

Discount rate	4.4% p.a.
Pay increases	2.6% p.a.
Pension increases	2.3% p.a.

Mortality assumptions

Future life expectancy based on the Actuary's fund-specific mortality review was:

Mortality assumption at age 65	Male	Female
Current pensioners	22.1 years	24.3 years

Commutation assumption

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

19. Actuarial present value of promised retirement benefits

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

In order to assess the value of the benefits on this basis, the Actuary has updated the actuarial assumptions (set out below) from those used for funding purposes (see Note 18). The Actuary has also used valued ill health and death benefits in line with IAS 19.

Calculated on an IAS19 basis, the actuarial present value of promised retirement benefits at 31 March 2020 was £1,489m (31 March 2019: £1,826m). This figure includes both vested and non-vested benefits, although the latter is assumed to have a negligible value. The Fund Accounts do not take account of liabilities to pay pensions and other benefits in the future.

The liabilities above are calculated on an IAS 19 basis and therefore differ from the results of

the 2019 triennial funding valuation because IAS 19 stipulates a discount rate rather than a rate which reflects market rates.

Financial assumptions

Inflation/pensions increase rate	1.9%
Salary increase rate	2.2%
Discount rate	2.3%

Longevity assumption

The average future life expectancies at age 65 are summarised below:

	Males	Females
Current pensioners	22.1 years	24.3 years
Future pensioners*	23.0 years	25.5 years

* Future pensioners are assumed to be currently aged 45

Commutation assumption

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

Sensitivity Analysis

Sensitivity to the assumptions for the year ended 31 March 2020	Approximate % increase to liabilities	Approximate monetary amount (£m)
0.5% p.a. increase in the Pension Increase Rate (CPI)	9%	127
0.5% p.a. increase in the Salary Increase Rate	1%	8
0.5% p.a. decrease in the discount rate	9%	136

20. Assets

a) Current assets

	31 March 2019	31 March 2020
	£m	£m
Debtors:		
- Contributions due – employees	1.3	0.7
- Contributions due – employers	7.0	2.9
- Sundry debtors	0.8	0.5
Total	9.1	4.0

Analysis of debtors

	31 March 2019	31 March 2020
	£m	£m
Central government bodies	0.1	0.4
Other local authorities	6.8	3.5
Other entities and individuals	2.2	0.1
Total	9.1	4.0

Non- current assets comprises of contributions due from employers, repayable later than a year from the Balance Sheet date.

21. Current liabilities

	31 March 2019	31 March 2020
	£m	£m
Group transfers	(0.1)	0.0
Sundry creditors	1.0	0.4
	<u>0.9</u>	<u>0.4</u>

Analysis of creditors

	31 March 2019	31 March 2020
	£m	£m
College of North West London	(0.1)	0.0
Other entities and individuals	1.0	0.4
Total	<u>0.9</u>	<u>0.4</u>

22. Additional voluntary contributions

	Market value 31 March 2019	Market value 31 March 2020
	£m	£m
Clerical Medical	1.3	1.3
Equitable Life	0.2	0.2
Prudential	0.1	0.3
Total	<u>1.5</u>	<u>1.8</u>

The Pension Fund's former provider, Equitable Life, no longer accepts AVC contributions from Scheme members.

For information, Prudential has since replaced Clerical Medical as the Fund's AVC provider with effect from 1 April 2014.

In accordance with Regulation 4(1)(b) of the Pension Scheme (Management and Investment of Funds) Regulations 2016, the contributions paid and the assets of these investments are not included in the Fund's Accounts.

23. Related party transactions

Brent Council

The Brent Pension Fund is administered by Brent Council. Consequently, there is a strong relationship between the Council and the Pension Fund.

The Council incurred costs of £0.997m (2018/19: £0.796m) in relation to the administration of the Fund and was subsequently reimbursed by the Fund for these expenses. The Council is also the single largest employer of members of the Pension Fund and contributed £33.7m to the Fund in 2019/20 (2018/19: £32.5m).

Governance

There are no members of the Pension Fund Sub-Committee who are either in receipt of pension benefits from or active members of the Brent Pension Fund. Each member of the Pension Fund Sub-Committee is required to declare their interests at each meeting.

Key management personnel

The key management personnel of the fund are the Chief Executive, the Assistant Chief Executive the Director of Legal & HR, the Director of Finance (s.151 officer) and the Head of Finance (Pensions). The proportion of the total remuneration payable to key management personnel that is charged to the Pension Fund is set out below:

	31st March 2019	31st March 2020
	£m	£m
Short Term Benefits	0.036	0.039
Post Employment Benefits	0.008	0.011
Termination Benefits	0.000	0.000
Total Remunerations	0.044	0.050

24. Contingent liabilities

Outstanding capital commitments (investments) at 31 March 2020 totalled £76m (31 March 2019: £26.9m).

	31st March 2019	31st March 2020
	£m	£m
Capital Dynamics	14.1	13.9
Alinda Fund II	2.9	3.1
Alinda Fund III	9.9	9.5
London CIV Infrastructure Fund	n/a	49.5
Total	26.9	75.9

These commitments relate to outstanding call payments due on unquoted limited partnership funds held in the private equity and infrastructure parts of the portfolio. The amounts 'called' by these funds are irregular in both size and timing over a period of between four and six years from the date of each original commitment.

25. Contingent Assets

Other Contingent assets

Two non-associated admitted body employers in the Brent Pension Fund hold insurance bonds to guard against the possibility of being unable to meet their pension obligations. These bonds are drawn in favour of the Pension Fund and payment will only be triggered in the event of employer default.

	31st March 2019	31st March 2020
	£m	£m
Apleona HSG Limited (previously Bilfinger)	0.1	0.1
Conway Aecom	0.1	0.1
Capita Business Services*	0.1	0.0
Total	0.3	0.2

*Admission agreement has ended, therefore Contingent Assets are £0.0m as at 31st March 2020.

26. Impairment Losses

The Fund had no contingent liabilities at 31 March 2020.

Statement of Responsibilities

The Fund's responsibilities

The Fund is required to:

- make arrangements for the proper administration of its financial affairs and to make one of its officers responsible for the administration of those affairs. At Brent Council, the Director of Finance fulfils that responsibility.
- manage its affairs so as to use resources economically, efficiently and effectively, and safeguard its assets
- approve the Brent Pension Fund's statement of accounts.

Director of Finance's responsibilities

The Director of Finance is responsible for preparing the Brent Pension Fund's statement of accounts in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the UK 2019/20 ('the Code of Practice').

In preparing this statement of accounts, the Director of Finance has:

- selected suitable accounting policies and applied them consistently
- made judgements and estimates that were reasonable and prudent
- complied with the Code of Practice.

The Director of Finance has also:

- kept proper accounting records, which are up to date
- taken reasonable steps to prevent fraud and other irregularities.

Director of Finance's statement

I certify that the statement of accounts as set out on pages 33 to 62 presents a true and fair view of the financial position of the Brent Pension Fund as at the accounting date and its income and expenditure for the year ended 31 March 2020.

Minesh Patel CPFA

Director of Finance

Date TBC

9. Independent Auditor's Report

Independent auditor's report to the members of London Borough of Brent on the pension fund financial statements of Brent Pension Fund

Opinion

We have audited the financial statements of Brent Pension Fund (the 'pension fund') administered by London Borough of Brent (the 'Authority') for the year ended 31 March 2020 which comprise the Fund Account, the Net Assets Statement and notes to the pension fund financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20.

In our opinion, the financial statements:

- give a true and fair view of the financial transactions of the pension fund during the year ended 31 March 2020 and of the amount and disposition at that date of the fund's assets and liabilities,
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20; and
- have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the pension fund's financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

The impact of macro-economic uncertainties on our audit

Our audit of the pension fund financial statements requires us to obtain an understanding of all relevant uncertainties, including those arising as a consequence of the effects of macro-economic uncertainties such as Covid-19 and Brexit. All audits assess and challenge the reasonableness of estimates made by the Director of Finance and the related disclosures and the appropriateness of the going concern basis of preparation of the financial statements. All of these depend on assessments of the future economic environment.

Covid-19 and Brexit are amongst the most significant economic events currently faced by the UK, and at the date of this report their effects are subject to unprecedented levels of uncertainty, with the full range of possible outcomes and their impacts unknown. We applied a standardised firm-wide approach in response to these uncertainties. However, no audit should be expected to predict the unknowable factors or all possible future implications for a fund associated with these particular events.

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the Director of Finance's use of the going concern basis of accounting in the preparation of the pension fund's financial statements is not appropriate; or
- the Director of Finance has not disclosed in the pension fund's financial statements any identified material uncertainties that may cast significant doubt about the Authority's ability to continue to adopt

the going concern basis of accounting for the pension fund for a period of at least twelve months from the date when the pension fund's financial statements are authorised for issue.

In our evaluation of the Director of Finance's conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20 that the pension fund financial statements shall be prepared on a going concern basis, we considered the risks associated with the fund's operating model, including effects arising from macro-economic uncertainties such as Covid-19 and Brexit, and analysed how those risks might affect the fund's financial resources or ability to continue operations over the period of at least twelve months from the date when the financial statements are authorised for issue. In accordance with the above, we have nothing to report in these respects.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the absence of reference to a material uncertainty in this auditor's report is not a guarantee that the fund will continue in operation.

Emphasis of Matter - effects of Covid-19 on the investment valuation

We draw attention to Note 5 of the financial statements, which describes the effects of the Covid-19 pandemic on the valuation of the pension fund's private equity and infrastructure investments as at 31 March 2020. As disclosed in note 5 to the financial statements, due to the uncertainty in the financial markets caused by the current Coronavirus pandemic, there is an increased risk that the valuation of the Fund's level 3 investments maybe affected and the valuations may be misstated. The Fund's private equity and infrastructure investments are usually valued in the accounts based on 31st December valuations, with adjustments to roll forward cashflows to 31st March as appropriate and therefore do not fully take into accounts the impact of Covid-19 pandemic. Our opinion is not modified in respect of this matter.

Other information

The Director of Finance is responsible for the other information. The other information comprises the information included in the Statement of Accounts, the Narrative Report and the Annual Governance Statement, other than the pension fund's financial statements, our auditor's report thereon and our auditor's report on the Authority's and group's financial statements. Our opinion on the pension fund's financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the pension fund's financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the pension fund's financial statements or our knowledge of the pension fund obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the pension fund's financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinion on other matter required by the Code of Audit Practice published by the National Audit Office on behalf of the Comptroller and Auditor General (the Code of Audit Practice)

In our opinion, based on the work undertaken in the course of the audit of the pension fund's financial statements and our knowledge of the pension fund the other information published together with the pension fund's financial statements in the Statement of Accounts, the Narrative Report, the Annual Governance Statement for the financial year for which the financial statements are prepared is consistent with the pension fund's financial statements.

Matters on which we are required to report by exception

Under the Code of Audit Practice, we are required to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make a written recommendation to the Authority under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or

- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters.

Responsibilities of the Authority, the Director of Finance and Those Charged with Governance for the financial statements

As explained more fully in the Statement of Responsibilities for the Statement of Accounts, the Authority is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this authority, that officer is the Director of Finance. The Director of Finance is responsible for the preparation of the Statement of Accounts, which includes the pension fund's financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20, for being satisfied that they give a true and fair view, and for such internal control the Director of Finance determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the pension fund's financial statements, the Director of Finance is responsible for assessing the pension fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention by government that the services provided by the pension fund will no longer be provided.

The Audit and Standards Committee is Those Charged with Governance. Those charged with governance are responsible for overseeing the Authority's financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the pension fund's financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of our report

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the Authority's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

Paul Dossett

Paul Dossett, Key Audit Partner
for and on behalf of Grant Thornton UK LLP, Local Auditor, London

11 September 2020

10. Glossary

Active Management

A style of investment management which seeks to provide outperformance of a relevant benchmark through either asset allocation, market timing or stock selection (or a combination of these). Directly contrasted with passive management that seeks to replicate the performance of a selected benchmark.

Actuarial assumptions

The combined set of assumptions made by the actuary, regarding the future, to calculate the value of liabilities. The main assumptions will relate to the discount rate, salary growth, pension increases and longevity. More prudent assumptions will give a higher liability value, whereas more optimistic assumptions will give a lower value.

Actuarial Valuation

A review of the Pension Fund by a qualified Actuary, which takes place every three years to ensure that employers' contributions are sufficient to maintain the solvency of the Fund in the long term.

Actuary

An independent qualified consultant who carries out the Actuarial Valuation and advises on new investment strategies.

Administering Authority

A local authority with statutory responsibility for running a pension fund under LGPS regulations, in effect the Fund's "trustees". Within the geographical boundary of the London Borough of Brent this is Brent Council.

Admitted Bodies

An organisation, which, under the Pension Scheme Regulations, is able to apply to the Administering Authority to join the Scheme (e.g., a contractor providing services to the Council or another scheduled body). Upon acceptance, an Admission Agreement is prepared which sets out the employer's obligations and admits the organisation to voluntarily participate in the Fund and allowing its employees to join.

Alternative Investments

Less traditional investments where risks can be greater but potential returns higher over the long term, for example investments in private equity partnerships, hedge funds, commodities, foreign currency and futures.

Asset Allocation / Asset Mix

The apportionment of the Fund's assets between asset classes and/or markets. Asset allocation may be either strategic, i.e., long term, or Tactical, i.e., short term, aiming to take advantage of relative market movements.

Auditor

An independent qualified accountant who is required to verify and agree the Pension Fund Accounts and issue an opinion on their accuracy.

AVCs

Additional voluntary contributions – paid by a contributor who decides to supplement his or her pension by paying extra contributions to the scheme's AVC providers (Clerical Medical and Equitable Life).

Benchmark

A “notional” fund or model portfolio which is developed to provide a standard against which a manager's performance is measured, e.g., for a global equity fund the benchmark against which it will be measured could be made up 70%/30% by overseas equities/UK equities. A target return is generally expressed as some margin over the benchmark.

Bond

A certificate of debt, paying a fixed rate of interest for a defined period of time, issued by companies, governments or government agencies.

Bulk Transfer

A transfer of a group of members agreed by and taking place between two pension schemes.

Cessation Valuation

A calculation carried out by the Actuary when an employer leaves the Fund, which may result in a final deficit payment becoming due to the Fund.

Common contribution rate

The Fund-wide future service rate plus past service adjustment. It should be noted that this will differ from the actual contributions payable by individual employers.

Commutation

The conversion of an annual pension entitlement into a lump sum on retirement.

Contingent Liability

A possible loss, subject to confirmation by an event after the Balance Sheet date, where the outcome is uncertain in terms of cost.

Covenant

The assessed financial strength of the employer. A strong covenant indicates a greater ability (and willingness) to pay for pension obligations in the long run. A weaker covenant means that it appears that the employer may have difficulties meeting its pension obligations in full over the longer term.

Deficit

The shortfall between the assets value and the liabilities value. This relates to assets and liabilities built up to date, and ignores the future build-up of pension (which in effect is assumed to be met by future contributions).

Discount rate

The annual rate at which future assumed cash flows (in and out of the Fund) are discounted to the present day. This is necessary to provide a liabilities value which is consistent with the present day value of the assets, to calculate the deficit. A lower discount rate gives a higher liabilities value, and vice versa. It is similarly used in the calculation of the future service rate and the common contribution rate.

Dividends

Income to the Fund on its holdings of UK and overseas shares.

Emerging Markets

The financial markets of developing economies.

Equities

Shares in UK and overseas companies that can be traded on public markets.

Final Pay

This is the figure used to calculate most of a member's pension benefits and is normally their pay in the last year before they retire, or one of the previous two years' pay if that amount is higher. For a part-time employee, the figure used is normally the pay they would have received had they worked whole time.

Fixed Interest Securities

Investments in stocks mainly issued by governments, which guarantee a fixed rate of interest.

FTSE

A company that specialises in index calculation. Although not part of a stock exchange, co-owners include the London Stock Exchange and the Financial Times. They are best known for the FTSE 100, an index of the top 100 UK companies (ranked by size).

Fund Manager

A firm of professionals appointed by the Pension Fund Sub-Committee to carry out day to day investment decisions for the Fund within the terms of their Investment Management Agreement.

Funding Level

The ratio of assets value to liabilities value.

Funding Target

The amount of assets which the Fund needs to hold at any point in time to meet all benefits promised.

Future service rate

The actuarially calculated cost of each year's build-up of pension by the current active members, excluding members' contributions but including Fund administrative expenses. This is calculated using a chosen set of actuarial assumptions.

Gilts

Fixed-interest bonds issued by the British government, i.e., a promise by the Government to pay interest and capital as per the terms of that particular gilt, in return for an initial payment of capital by the purchaser. Gilts can be “fixed interest”, where the interest payments are level throughout the gilt’s term, or “index-linked” where the interest payments vary each year in line with a specified index (usually RPI). Gilts can be bought as assets by the Fund, but their main use in funding is as an objective measure of solvency. They are the equivalent of U.S. Treasury securities.

Global Custodian

A bank that looks after the Fund’s investments, implements investment transactions as instructed by the Fund’s managers and provides reporting, performance and administrative services to the Fund.

Guarantor

A body which guarantees to pay for an Admitted Body’s liabilities in case of default. For any new Admitted Body wishing to join the Fund, the Administering Authority will require a Guarantor. The presence of a Guarantor will mean, for instance, that the Fund can consider the employer’s covenant to be as strong as its Guarantor’s.

Hedge Fund

A specialist fund that seeks to generate consistent returns in all market conditions by exploiting opportunities resulting from inefficient markets.

Hedging

A strategy which aims to eliminate a risk in an investment transaction (both upside and downside potential). Often used in the context of overseas investments to eliminate the impact of currency movements.

Income Yield

Annual income on an investment divided by its price and expressed as a percentage.

Index

A measure of the value of a stock market based on a representative sample of stocks. An index is often used as a benchmark for the performance of a group of shares or bonds.

Index-Linked Securities

Investments which generate returns in line with an index.

Investment Adviser

A professionally qualified individual or company whose main livelihood is derived from providing objective, impartial investment advice to companies, pension funds or individuals.

Letting employer

An employer which outsources or transfers a part of its services and workforce to another employer (usually a contractor). The contractor will pay towards the LGPS benefits accrued by the transferring members, but ultimately the obligation to pay for these benefits will revert to the letting employer. A letting employer will usually be a local authority, but can sometimes be another type of employer such as an Academy.

LGPS

Local Government Pension Scheme – a nationwide scheme for employees working in local government or working for other employers participating in the scheme. Government Regulations dictate eligibility (particularly for Scheduled Bodies), members' contribution rates, benefit calculations and certain governance requirements. The LGPS is divided into 101 Funds which map the UK. Each LGPS Fund is autonomous to the extent not dictated by Regulations, e.g., regarding investment strategy, employer contributions and choice of advisers.

Liabilities

The actuarially calculated present value of all pension entitlements of all members of the Fund, built up to date. This is compared with the present market value of Fund assets to derive the deficit. It is calculated on a chosen set of actuarial assumptions.

LIBOR

London Inter Bank Offer Rate – the interest rate that banks charge each other in the short-term international money market. It is often used as a benchmark to set other interest rates or to measure returns on investments.

Mandate

A set of instructions given to the fund manager by the client as to how a fund is to be managed (e.g., targets for performance against a benchmark may be set or the manager may be prohibited from investing in certain stocks or sectors).

Market Value

The “on paper” value of a security at a specific point in time. It is calculated by multiplying the number of shares held by market price of that share in sterling terms.

Maturity

A general term to describe a Fund (or an employer's position within a Fund) where the members are closer to retirement (or more of them already retired) and the investment time horizon is shorter. This has implications for investment strategy and, consequently, funding strategy.

Members

The individuals who have built up (and may still be building up) entitlement in the Fund. They are divided into actives (current employee members), deferreds (ex-employees who have not yet retired) and pensioners (ex-employees who have now retired, and dependants of deceased ex-employees).

Orphan Liabilities

Residual liabilities of employers from whom no further funding can be obtained.

Outperformance / underperformance

The difference in returns gained by a particular fund against the “average” fund or an index over a specified time period, i.e., a target for a fund may be outperformance of a given benchmark over a three-year period.

Past service adjustment

The part of the employer’s annual contribution which relates to past service deficit repair.

Performance

A measure, usually expressed in percentage terms, of how well a fund has done over a particular time period – either in absolute terms or as measured against the “average” fund of a particular benchmark.

Pooled Investment Fund

A collective investment scheme that works by pooling money from different individual investors.

Pooling

Employers may be grouped together for the purpose of calculating contribution rates, so that their combined membership and asset shares are used to calculate a single contribution rate applicable to all employers in the pool. A pool may still require each individual employer to ultimately pay for its own share of deficit, or (if formally agreed) it may allow deficits to be passed from one employer to another.

Portfolio

Term used to describe all investments held.

Private Equity

Mainly specialist pooled partnerships that invest in private companies not normally traded on public stock markets – these are often illiquid (i.e., not easily turned into cash) and higher-risk investments that should provide high returns over the long term.

Profile

The profile of an employer’s membership or liability reflects various measurements of that employer’s members, i.e., current and former employees. This includes: the proportions which are active, deferred or pensioner; the average ages of each category; the varying salary or pension levels; the lengths of service of active members vs their salary levels, etc. A membership (or liability) profile might be measured for its maturity also.

Rates and Adjustments Certificate

A formal document required by the LGPS Regulations, which must be updated at least every three years at the conclusion of the formal valuation. This is completed by the actuary and confirms the contributions to be paid by each employer (or pool of employers) in the Fund for the three year period until the next valuation is completed.

Recovery Period

Timescale allowed over which surpluses or deficiencies to the Fund can be eliminated.

Regulations

The Scheme is governed by Regulation approved by Parliament. Necessary amendments are made to these Regulations by means of Statutory Instruments.

Risk

Generally taken to mean the variability of returns. Investments with greater risk must usually promise higher returns than more “stable” investments before investors will buy them.

Scheduled Bodies

These are organisations as listed in the Local Government Pension Scheme Regulations 1997 (Schedule 2) who must be offered membership of their local LGPS Fund as of right. These include Councils, colleges, universities, academies, police and fire authorities, etc., other than employees who have entitlement to a different public sector pension scheme (e.g., teachers, police and fire officers, university lecturers).

Securities

Investment in company shares, fixed interest or index-linked stocks.

Solvency

When the Fund’s assets are greater than or equal to 100% of the Funding Target, which is the liabilities value.

Stabilisation

Any method used to smooth out changes in employer contributions from one year to the next. This is very broadly required by the LGPS Regulations, but in practice is particularly employed for large stable employers in the Fund. Different methods may involve: probability-based modelling of future market movements; longer deficit recovery periods; higher discount rates; or some combination of these.

Statement of Investment Principles

Requirement, arising from the Pensions Act 1995, that all occupational pension plan trustees must prepare and maintain a written Statement of Investment Principles outlining policy on various investment matters (e.g., risk, balance between real and monetary assets, realisability of assets, etc.).

Theoretical contribution rate

The employer’s contribution rate, including both future service rate and past service adjustment, which would be calculated on the standard actuarial basis, before any allowance for stabilisation or other agreed adjustment.

Transfer Value

Capital value transferred to or from a scheme in respect of a contributor’s previous periods of pensionable employment.

Unit Trust

A method which allows investors’ money to be pooled and used by fund managers to buy a variety of securities.

Valuation

An actuarial investigation to calculate the liabilities, future service contribution rate and common contribution rate for a Fund, and usually individual employers too. This is normally carried out in full every three years (last done as at 31 March 2016), but can be approximately updated at other times. The assets value is based on market values at the valuation date, and the liabilities value and contribution rates are based on long term bond market yields at that date also.

Yield Curve

A graphic line chart that shows interest rates at a specific point for all securities having equal risk, but different maturity dates. For bonds, it typically compares the two- or five-year Treasury with the 30-year Treasury

11. Appendices

a. Pensions Administration Strategy

London Borough of Brent

Pension Administration Strategy (PAS)

December 2018

Contents

1. Introduction

2. PAS Policy Statement

2.1 Pension Administration Strategy Statement

2.2 Legislative Context

2.3 Aims

2.4 Objectives

2.5 Documents which make up the strategy

3. Service Level Agreement

3.1 Employer Functions

3.2 Actuarial Work

3.3 Administering Authority Functions

3.4 Employer Responsibilities

4. Staff Charging Schedule

5. Pensions Administration Strategy - Charging

5.1 Why we need to charge

5.2 Circumstances on when we would charge

5.3 Monitoring after a Levy has been made on an employer

6. Fees

Annex1

Appendix 1 – Regulation Extract

Appendix 2 – Employers Guide

London Borough of Brent Pension Administration Strategy (PAS)

1. Introduction

The Local Pensions Partnership (LPP) started as the pension administrators for the Brent Pension Fund on 1 October 2018. The LPP perform their pension administration in a different way to the previous pension administrators and the PAS has been revised to take those changes into account.

In addition, the Pension Administration Strategy has been updated to take account of changes to the LGPS regulations and the guidance from The Pensions Regulator.

This revised Pension Administration Strategy applies to all employers, academies, and maintained schools (referred to as here as scheme employers or employers).

The aim of the revised Pension Administration Strategy is to ensure that the London Borough of Brent Pension Fund (“the Fund”), “the Administering Authority” (The London Borough of Brent), and employers work together to ensure that accurate data is submitted in a timely manner and member events are notified within the service level agreement set out in this document. The Fund’s strategy is to work with employers to achieve this and to assist and support employers to do so.

2. Pension Administration Strategy Policy Statement

2.1 Pensions Administration Strategy Statement

The statement sets out the aims and objectives of the Pensions Administration Strategy and gives a summary of the major elements which make up the strategy.

2.2 Legislative context

- Local Government Pension Scheme (Benefits, Membership and Contributions) Regulations 2007 (as amended)
- Local Government Pension Scheme (Administration) Regulations 2008 (as amended)
- Local Government Pension Scheme (Transitional Provisions) Regulations 2008 (as amended)
- Local Government Pension Scheme Regulations 2013 (as amended)
- Local Government Pension Scheme (Transitional Provisions and savings) Regulations 2013.

2.3 Aims

In making this strategy the Funds aims are:

- To clarify the roles and responsibilities of the “Fund” and scheme employers in administering the Local Government Pension Scheme
- To ensure the services provided by the “Fund” are equitable and transparent
- To assist employers in the effective provision of necessary data.

2.4 Objectives

The Pension Administration Strategy will meet those objectives by introducing a service level agreement between the “Fund” and scheme employers.

2.5 Documents which make up the strategy

Together with this statement the strategy is set out in the following documents:

Pensions Administration Strategy - Service Level Agreement

The service level agreement sets out the roles and responsibilities of the “Fund” and scheme employers.

Pensions Administration Strategy - Employer guide

The guide sets out the processes and procedures employers should follow in order to comply with their legal responsibilities under the LGPS regulations.

3. Service Level Agreement

Pensions Administration Strategy - Service level agreement

3.1 Employer Functions

The following functions have been designated employer functions. This means that they are outside the responsibilities of the administering authority. The “Fund” provides these services for a fee (staffing charges applied by the day or per hour) and the amounts are set out in Annex 1.

There are no changes to these functions as a result of the revised strategy.

Task	Description
Redundancy and Severance	Calculation and payment of redundancy and/or severance payments
FRS 17	Provision of data required for FRS17 calculations
Cessation and interim valuation data	Provision of data required for interim and/or cessation valuations
Miscellaneous non LGPS	Any requests for advice or work which are outside of the requirements of an administering authority as defined by the LGPS regulations
Admission Agreements	Setting up and amendment of admission agreements
3 rd Party activity	Recharges will apply to any work for which a third party is required e.g lawyer or actuary, and the cost will be incurred by the employer

3.2 Actuarial Functions

The following functions have been designated actuarial functions that employers will require input from both the LPP and the Fund's Actuary Hymans Robertson. This means that they are functions which if required, must be provided by the LPP and/or Hymans Robertson.

As above, there are no changes to these functions as a result of the revised strategy.

Task	Description
Legal work & non-standard actuarial work	Any work in relation to this will require input from both the LPP and the Funds Actuary
Cessation valuations	Any work in relation to this will require input from both the LPP and the Funds Actuary
Employer actuarial valuations	Any work in relation to this will require input from both the LPP and the Funds Actuary
Academy conversion	Any work in relation to this will require input from both the LPP and the Funds Actuary
Valuation of unfunded liabilities	Any work in relation to this will require input from both the LPP and the Funds Actuary

3.3 Administrating Authority Functions

The following functions have been designated administrating authority functions since they relate directly to the core purpose of administering the scheme.

Also shown are the timescales we will complete the task within (from receipt of all information) and the on time target for each task.

Case Type/Task	Limitation	Timescale (working days)	Target (% within timescale)
Admissions	No	10	95%
Transfers In	No	10	95%
Transfer Out	No	15	95%
Estimates employee	No	10	95%
Retirements	No	5	95%
Deferred Benefits	No	10	95%
Refunds	No	10	95%
Deaths	No	5	95%
Correspondence	No	5	95%
PR update	No	20	95%
Queries to employer	No	15	95%

3.4 Employer Responsibilities

Employers will be responsible for the following functions/tasks to be performed/supplied in the manner and timescale set out below.

An employer guide can be found at Annex 2.

<p>Payments of monies due</p>	<ul style="list-style-type: none"> • Monthly contributions – on time and the correct amount • Payroll Recharge – on time, and the correct amount • Capital Sums – on time, and the correct amount • Single payments of contributions
<p>End of year error rates</p> <p>Examples of end of year errors</p> <ul style="list-style-type: none"> • A missing joiner Form • A missing leaver Form • A missing change of hours • A missing notification of absence • Return from absence • Missing additional contributions • Significantly low/high pensionable remuneration compared to the previous year with no explanation as to the reason 	<p>Respond to errors within 10 working days of notification</p> <p>If you are unable to respond in ten working days then inform the LPP of the likely time frame that you can respond in and advise Brent Pensions of the delay</p>
<p>Submission of year end return</p>	<p>You must submit your year end return by 30th April each year</p> <p>If you are unable to submit your yearend return then inform the LPP of the likely time frame that you can provide it and the reason why and advise Brent Pensions of the delay</p>
<p>Response to other queries raised (e.g. by the LPP Pensions Services or Employer Services teams)</p> <p>There are times where the LPP may need to confirm with you that a member’s record is correct before issuing them with a benefit calculation. It is these types of queries that we are referring to</p>	<p>2 weeks from notification by the LPP Pensions Operations or Data Management teams</p> <p>If unable to respond in 2 weeks then inform the LPP of the likely timeframe that you can respond in and advise Brent Pensions of the delay</p>

On-line access Employer LPP portal “YourFund”	Use of online Forms for all relevant tasks
Submission of joiners/leavers	<ul style="list-style-type: none"> • Notification of joiners within 1 month of joining the scheme • Notification of leavers within 1 month of leaving the scheme • Notification of retirement within 1 month prior to the last day of service
Notification of other changes during employment	<ul style="list-style-type: none"> • Relevant changes e.g. change of hours, absence notification online within 1 month of the event
Correct admission of members into the Fund	You must ensure that you are correctly admitting members into the “Fund”
Up to date discretions policies in place	Discretionary policies to be in place and up to date
Customer Relationship Management contacts	<ul style="list-style-type: none"> • LPP notified of contact change or new contact within 1 month via the employers contact form

4. Staff Charging Schedule

The Fund’s staffing charges for work over and above the responsibilities of the administering authority as at December 2018.

VAT is charged on all applicable items.

Staffing level	Charge per day excluding VAT	Charge per hour excluding VAT
Admin Staff	£382.00	£53.00
Team Leader	£534.00	£78.00
Specialist	£534.00	£78.00
Manager	£727.00	£103.00
Senior Manager	£998.00	£142.00
Director	£1,470.00	£210.00

5. Pensions Administration Strategy – Charging

5.1 Why we need to charge

Whilst the vast majority of employers do provide accurate scheme data on time and process member pension events such as joiners and leavers, there remains a small cohort of employers who have not done so. The Pension Regulator is insistent that all employers comply with their legal duties and for the “Fund” to have in place a mechanism to impose a levy on employers who fail to do this. Following The Pension Regulator’s guidance the “Fund” has incorporated levies for non-compliance of these duties.

5.2 Circumstances on when we would charge

The “Fund” has not set out to arbitrarily impose levies on employers for every minor infraction an employer makes in regards to providing scheme data and processing member’s events. The aim is for all employers to work together with the “Fund” and our pension administrator to comply with their legal duties. The service level agreement sets out the timeframes on how long particular functions should be completed by. The “Fund” recognises that there are times when this will not be met or be possible and it is not the Funds intention to automatically levy an employer for this, however employers are expected to remedy matters as soon as is practicable. Should it be the case that an employer persistently takes no regard of the Funds request to comply with their legal duties, and does not work with the Fund to overcome these shortcomings, then imposing a Levy on an employer would be considered (please note that it is the Funds aim is to actively engage with employers to provide them with support to bring them into line with meeting their legal duties before imposing a levy).

5.3 Monitoring after a Levy has been made on an employer

Should it be the case that the “Fund” has imposed a levy on an employer, then that employer will be encouraged and supported to meet its legal duties. Their performance will be monitored and if they are complying with and continue to comply with their legal duties, then consideration will be made by the “Fund” to refund the Levy imposed on them by the “Fund”.

6. Fees – Annex 1

As a last resort and after trying to assist the employer with support or training, the “Fund” reserves the right to levy a fee on an employer whose performance consistently falls short of the standards set out in this document.

Activities	Fees excluding VAT
Late payment of monthly contributions - electronically after 22 th Calendar month following deduction and 19 th for cheques (Required by law)	£60 plus interest calculated on a daily basis
Monthly Contributions – non provision of the correct schedule of payments in stipulated Format and accompanying the respective contribution payment	£60 per occasion
Change Notification – failure to notify administrators of a change to a members working hours, leave of absence with permission (maternity, paternity, career break) or leave of absence without permission (strike, absent without permission) – within 1 month of the change of circumstances	£60 per occasion
Year End Data – failure to provide year end data by 30th April following the year end	£235 initial fee then £95 for every month the information remains outstanding
Year End Data Queries – failure to respond to the administrators requests for information to resolve data queries within the prescribed timescale	£60 initial fee then £25 for every month the information remains outstanding
New Starter - failure to notify the administrator of a new starter within 1 month of joining the scheme	£60 initial fee then £25 for every month the information remains outstanding
Leaver – failure to notify the administrator of any leaver within 1 month of leaving the scheme	£60 initial fee then £25 for every month the information remains outstanding
Retirees – failure to notify the administrators when a scheme member is due to retire within 1 month before the retirement date	£60 initial fee then £25 for every month the information remains outstanding

<p>Late payment of pension benefits – if due to an employer’s failure to notify the administrator of a scheme members retirement, interest becomes payable on any lump sum paid. The administrator will recharge the total interest paid to the employer</p>	<p>Interest charged in accordance with regulation 44 of the LGPS administration regulations</p> <p>Charged at Bank of England Base rate plus 1%</p>
<p>Change of employer contact details - The “Fund” not notified of contact change or new contact within 1 month of alteration</p>	<p>£60 per occasion</p>
<p>Submission of pension contribution data – The “Fund” not informed by the employer of not having submitted pension contribution data or contributions within the timelines set out in this agreement</p>	<p>£60 per occasion</p>

Appendix 1 - Regulation Extract

LOCAL GOVERNMENT PENSION SCHEME REGULATIONS 2013

The Regulations in relation to the Pension Administration Strategy are contained in the Local Government Pension Scheme Regulations 2013, and are set out below:

Pension administration strategy

Regulation 59(1) of the Local Government Pension Scheme Regulations 2013, enables a Local Government Pension Scheme Fund to prepare a written statement of the authority's policies ("its pension administration strategy") as one of the tools which can help in delivering a high quality administration service to its scheme members and other interested parties.

In addition, Regulation 59(2)e of the 2013 regulations, allows a fund 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 fund 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.

59. (1) An administering authority may prepare a written statement of the authority's policies in relation to such of the matters mentioned in paragraph (2) as it considers appropriate ("its pension administration strategy") and, where it does so, paragraphs (3) to (7) apply.

(2) The matters are-

(a) procedures for liaison and communication with Scheme employers in relation to which it is the administering authority ("its Scheme employers");

(b) the establishment of levels of performance which the administering authority and its Scheme employers are expected to achieve in carrying out their Scheme functions 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 considers appropriate;

(c) procedures which aim to secure that the administering authority and its Scheme employers comply with statutory requirements in respect of those functions and with any agreement about levels of performance;

(d) procedures for improving the communication by the administering authority and its Scheme employers to each other of information relating to those functions;

(e) the circumstances in which the administering authority may consider giving written notice to any of its Scheme employers under regulation 70 (additional costs arising from Scheme employer's level of performance) on account of that employer's unsatisfactory performance in carrying out its Scheme functions when measured against levels of performance established under sub-paragraph (b);

(f) the publication by the administering authority of annual reports dealing with—

(i) the extent to which that authority and its Scheme employers have achieved the levels of performance established under sub-paragraph (b), and

(ii) such other matters arising from its pension administration strategy as it considers appropriate; and

(g) such other matters as appear to the administering authority after consulting its Scheme employers and such other persons as it considers appropriate, to be suitable for inclusion in that strategy.

(3) An administering authority must—

- (a) keep its pension administration strategy under review; and
- (b) make such revisions as are appropriate following a material change in its policies in relation to any of the matters contained in the strategy.

(4) In preparing or reviewing and making revisions to its pension administration strategy, an administering authority must consult its Scheme employers and such other persons as it considers appropriate.

(5) An administering authority must publish—

- (a) its pension administration strategy; and
- (b) where revisions are made to it, the strategy as revised.

(6) Where an administering authority publishes its pension administration strategy, or that strategy as revised, it must send a copy of it to each of its Scheme employers and to the Secretary of State as soon as is reasonably practicable.

(7) An administering authority and its Scheme employers must have regard to the pension administration strategy when carrying out their functions under these Regulations.

(8) In this regulation references to the functions of an administering authority include, where applicable, its functions as a Scheme employer.

Payment by Scheme employers to administering authorities

69.—(1) Every Scheme employer must pay to the appropriate administering authority on or before such dates falling at intervals of not more than 12 months as the appropriate administering authority may determine—

- (a) all amounts received from time to time from employees under regulations 9 to 14 and 16 (contributions);
- (b) any charge payable under regulation 68 (employer's further payments) of which it has been notified by the administering authority during the interval;
- (c) a contribution towards the cost of the administration of the fund; and
- (d) any amount specified in a notice given in accordance with regulation 70 (additional costs arising from Scheme employer's level of performance).

(2) But—

(a) a Scheme employer must pay the amounts mentioned in paragraph (1)(a) within the prescribed period referred to in section 49(8) of the Pensions Act 1995(41); and

(b) paragraph (1)(c) does not apply where the cost of the administration of the fund is paid out of the fund under regulation 4(5) of the Local Government Pensions Scheme (Management and Investment of Funds) Regulations 2009 (management of pension fund)(42).

(3) Every payment under paragraph (1)(a) must be accompanied by a statement showing—

(a) the total pensionable pay received by members during the period covered by the statement whilst regulations 9 (contributions) applied (including the assumed pensionable pay members were treated as receiving during that period),

(b) the total employee contributions deducted from the pensionable pay referred to in subparagraph (a),

(c) the total pensionable pay received by members during the period covered by the statement whilst regulation 10 applied (including the assumed pensionable pay members were treated as receiving during that period),

(d) the total employee contributions deducted from pensionable pay referred to in subparagraph (c),

(e) the total employer contributions in respect of the pensionable pay referred to in subparagraphs (a) and (c),

(f) the total additional pension contributions paid by members under regulation 16 (additional pension contributions) during the period covered by the statement, and

(g) the total additional pension contributions paid by the employer under regulation 16 (additional pension contributions) during the period covered by the statement.

(4) An administering authority may direct that the information mentioned in paragraph (3) shall be given to the authority in such form, and at such intervals (not exceeding 12 months) as it specifies in the direction.

(5) If an amount payable under paragraph (1)(c) or (d) cannot be settled by agreement, it must be determined by the Secretary of State.

Additional costs arising from Scheme employer's level of performance

70. (1) This regulation applies where, in the opinion of an administering authority, it has incurred additional costs which should be recovered from a Scheme employer because of that employer's level of performance in carrying out its functions under these Regulations.

(2) The administering authority may give written notice to the Scheme employer stating-

(a) the administering authority's reasons for forming the opinion mentioned in paragraph (1);

(b) the amount the authority has determined the Scheme employer should pay under regulation 69(1)(d) (payments by Scheme employers to administering authorities) in respect of those costs and the basis on which the specified amount is calculated; and

(c) where the administering authority has prepared a pension administration strategy under regulation 59, the provisions of the strategy which are relevant to the decision to give the notice and to the matters in sub-paragraphs (a) or (b).

Background

- (A) The Administering Authority is an administering authority. It administers and maintains the Fund in accordance with the Regulations.
- (B) The Employer is a transferee admission body listed in Schedule 2 of the Administration Regulations.
- (C) In accordance with Regulation 59 of the Administration Regulations, the Administering Authority has prepared the Pension Administration Strategy Statement setting out amongst other things the Service Level Agreement.
- (D) In preparing the Pension Administration Strategy Statement, the Administering Authority consulted the employing authorities in the Fund (including the Employer), the Pensions Board, and such other persons it considered appropriate.

The Administering Authority published the Pension Administration Strategy Statement and sent a copy of it to each of the employing authorities in the Fund (including the Employer) and to the Secretary of State.

- (E) The Administering Authority will keep the Pension Administration Strategy Statement (including the Service Level Agreement) under review and will make such revisions as are appropriate following any material change in its policies in relation to any of the matters contained in the Pension Administration Strategy Statement.
- (F) The Administering Authority and the Employer have agreed to enter into this Agreement to document their agreement to comply with and be bound by the terms of the Service Level Agreement.

Now it is agreed as follows:

1. Interpretation

1.1 The following expressions have the following meanings:

“1997 Regulations”	the Local Government Pension Scheme Regulations 1997 (to the extent applicable by reason of the Transitional Regulations)
“Administration Regulations”	the Local Government Pension Scheme (Administration) Regulations 2008
“Benefit Regulations”	the Local Government Pension Scheme (Benefits, Membership and Contributions) Regulations 2007
“Core Scheme Functions”	the functions identified in the Service Level Agreement as being core Scheme functions
“Fund”	the Pension Fund

“Pension Administration Strategy Statement”	the Administering Authority’s statement prepared in accordance with Regulation 59 of the Administration Regulations as revised from time to time in accordance with that Regulation
“Regulations”	the Administration Regulations, the Benefit Regulations, the Transitional Regulations and the 1997 Regulations
“Scheme”	the Local Government Pension Scheme established by the Regulations made by the Secretary of State under sections 7 and 12 of the Superannuation Act 1972
“Service Level Agreement”	the section of the Pensions Administration Strategy Statement setting out the levels of performance which the Administering Authority and its employing authorities are expected to achieve in carrying out their Scheme functions including performance targets. The Service Level agreement may be revised from time to time as part of the Pensions Administration Strategy Statement. A copy of the Service Level Agreement current as at the date of this Agreement is included in the documentation
“Transitional Regulations”	the Local Government Pension Scheme (Transitional Provisions) Regulations 2008 & 2013

1.2 Expressions have the same meaning as in the Regulations, except where the context otherwise requires.

1.3 Any reference in the Agreement to any law or piece of legislation shall include any subsequent amendment to it and any ancillary legislation made under it.

2. The Service Level Agreement

2.1 With effect from the date of this Agreement, the Administering Authority and the Employer agree to use their best endeavours to comply with and be bound by the terms of the Service Level Agreement.

2.2 In consideration of this Agreement the Administering Authority will charge the Employer a contribution towards the cost of the administration of the Fund which reflects the fact that compliance with the Service Level Agreement will result in greater efficiencies and lower administration costs for the Fund.

2.3 If in the opinion of the Administering Authority the Employer has not complied with the terms of the Service Level Agreement the Administering Authority may charge the Employer a higher contribution towards the cost of the administration of the Fund.

2.4 When considering whether to charge the Employer a higher contribution towards the cost of the administration of the Fund in accordance with Clause 2.3 the Administering Authority shall take into account any failure on its own part to comply with the terms of the Service Level Agreement.

2.5 Clause 2.3 shall not affect the Administering Authority's ability under Regulation 70 of the Administration Regulations to give written notice to the Employer where it has incurred additional costs which should be recovered from the Employer because of the Employer's level of performance in carrying out its functions under the Regulations or the Service Level Agreement.

2.6 The Employer acknowledges that the Service Level Agreement may be revised from time to time by the Administering Authority in accordance with Regulation 59 of the Administration Regulations and that the Employer will comply with and be bound by the terms of the revised Service Level Agreement.

3. Other Charges

3.1 The Employer acknowledges that the contribution it is required to pay towards the cost of the administration of the Fund is to cover the cost of meeting the Core Scheme Functions.

3.2 Where the Employer requests that the Administering Authority provides services beyond these functions the Administering Authority reserves the right to charge the Employer for the provision of such services. Non-core services include by way of example and without limitation the provision of FRS17 reports, bulk redundancy calculations, bulk information requests, member presentations, site visits and the payment of compensatory added year's benefits. Such services will be provided on terms agreed at the time with the Administering Authority and the Employer.

4. Notices

Any notices under this Agreement shall be in writing and shall be served by sending the same by first class post, fax, facsimile or by hand or leaving the same at the headquarter address of the Employer or the headquarter address of the Administering Authority.

5. Waiver

Failure or neglect by the Administering Authority to enforce at any time any of the provisions of this Agreement shall not be construed nor shall be deemed to be a waiver of the Administering Authority's rights nor in any way affect the validity of the whole or any part of this Agreement nor prejudice the Administering Authority's rights to take subsequent action.

6. More than one Counterpart

This Agreement may be executed in more than one counterpart, which together constitute one agreement. When each signatory to this Agreement has executed at least one part of it, it will be as effective as if all the signatories to it had executed all of the counterparts. Each counterpart Agreement will be treated as an original.

7. Laws

This Agreement will be governed by and interpreted in accordance with the laws of England and Wales.

Any rights that a third party may have under the Contracts (Rights of Third Parties) Act 1999 are excluded.

Appendix 2 – Employer Guide

Employer Guide

What the “Fund” and the LPP needs from you to administer your employees’ pensions, with accuracy and efficiency.

Clean and accurate data

This means that we need to know details of all changes to your employees regarding their pension.

This includes:

- Joining the scheme
- Changing their working hours and/or working weeks
- Any unpaid leave (i.e. authorised absences, whether maternity/paternity/adoption leave, or ordinary unpaid leave)
- Any unauthorised absences (these are automatically entered as breaks in service as the member is not allowed to repay pension contributions for that period)
- Any strike periods
- Any reductions in pay
- Leaving the scheme (whether opting out, normal leaver or retiring).

The above changes can be notified by completing the relevant online Form.

We also need accurate data for the end of year returns. This enables us to identify any missing data in our records quickly, thus enabling accurate valuation of the fund and thereby keeping employer contribution rates down.

Brief Summaries of Actions needed

Joining the scheme

The online Joining Form must be completed with the following information:

- date from which the member first had contributions deducted
- the contribution rate
- the weekly hours the member works, and, if appropriate, the weeks per year that they work
- what pensionable pay the member receives, and, if appropriate, the full-time equivalent pensionable pay
- confirmation that the member has a contract of employment that lasts at least three months.

Change of hours

The online Change of Hours Form must be completed when you need to inform the LPP that a member has changed their weekly working hours, their working weeks per year, or both. We will need to know the hours (and/or weeks) they are changing to, and also the hours (and/or weeks) that they have changed from to enable us to check that our records are completely up to date.

Sick Leave

The LPP does not need to be informed if a member of the scheme is placed on reduced pay, or no pay due to sick leave.

Unauthorised Absence

It is not common for an employee to have a leave of absence that is not authorised by their employer. However, if a member does have such a period, the LPP need to be informed as this period will not count towards the calculation of their benefits and they will not have the opportunity to repay the contributions for that period. Therefore, please complete the Unauthorised Absence online Form if such a situation occurs.

Unpaid leave (Including maternity/paternity/adoption leave)

Any period of ordinary unpaid leave (or leave on reduced pay) that lasts less than 31 days does not need to be notified to LPP, although the member must have contributions for that period deducted from his pay on his return, and employer contributions must also be paid.

If the ordinary unpaid leave (or leave on reduced pay) lasts 31 days or more, then the LPP must be informed. The online Notification of Absence and Return from Absence Forms must be completed.

A strike period must be treated differently to ordinary unpaid leave, but it is not classified as unauthorised absence. The online Notification of Absence and Return from Absence Forms must be completed.

A member who goes on parental leaves must continue to have contributions deducted, but on the pay that they are actually receiving (including any statutory entitlement), not the pay they would have received, but for being on leave.

Once the member goes onto unpaid parental leave, the online Notification of Absence Form must be completed.

The LPP do not need to be informed if a member has a period of leave to enable them to perform jury service, but the contributions for that period must be paid by both employer and employee and must be based upon the pay that the member would have received if not performing jury service.

Leaving the scheme

It is essential that the LPP receives accurate, timely information regarding a member's pay when they cease to contribute to the pension scheme. When a member leaves the scheme, please complete the online Leaver Form. The appropriate online Ill Health Declaration Form, must also be completed if the member is retiring on the grounds of ill-health.

A member who opts-out of the scheme with less than three months membership must have their pension contributions refunded to them and will be treated as never having been in the scheme. In such cases, please complete the online Leaver Form.

If a member leaves your employment with less than three months membership, their contributions will be refunded to them. Please complete the online Leaver Form.

Monthly remittance/end of year returns

Each month a schedule of contributions paid must be completed with details of:

- Total pensionable remuneration against which contributions calculated
- The total employees' contributions
- The total employer's contributions
- Any cash payments that may be due from the employer
- The payment method and date.

The completed schedule of contributions paid and the contributions must be received by the Fund within 21 days of the end of the month, or 19 days for cheques, within which they were deducted from the employees' pay.

At the end of each year, a full submission of contributions must be submitted by each employer.

Please note that late submission of end of year returns will result in delayed annual benefit statements being sent to your employees, and could result in the Fund being incorrectly valued, leading to an increase in your employer contribution rate.

Using online Forms

To fully co-operate with the terms of the Pension Administration Strategy, online Forms must be used. To enable you to do this, a member of staff must be nominated to be your "Site Administrator" who will be able to/responsible for:

- Set up new users and determine their access levels
- Reset usernames and password
- Unlock locked accounts
- Disable user accounts
- Keeping your organisation's contact details up to date.

In this way, you can retain control over who has access to the site and is able to input the information required. The Site Administrator will also be our first contact for any news on updates to the website.

Nothing in this guide can override the information given in the Employer's Guide, the provisions of the Pension Regulations, or related legislation. The guide was up-to-date at the time of publication in October 2018. It is for general use and cannot cover every personal circumstance, nor does it cover specific protected rights that apply to a very limited number of employees. In the event of any dispute over a member's pension benefits, the appropriate legislation will prevail as this guide does not confer any contractual or statutory rights and is provided for information purposes only. The Fund will not be held responsible for any loss, damage or inconvenience caused as a result of any inaccuracy or error.

Online Forms

Online Forms must be completed and the details immediately forwarded to the LPP to enter onto the relevant LPP systems. Any errors or inconsistencies in the data can be quickly identified and can be remedied.

b. Employer Numbers Table

The table below shows the Brent employers and their members' details as at 31 March 2020

Employer	Active	Undecided Leaver	Deferred	Pensioner	Dependant	Frozen Refund
London Borough of Brent	3159	21	6583	5207	1000	812
Ark Elvin Academy	49		7	8	2	3
The Capita Pension & Life Ass.						
Age Concern			4	3		
Mencap			5	2		
Wettons South Ground Maintenance				3		
Wettons North Ground Maintenance			2	5		
Ark Academy	90		69	1	1	22
Torah Temimah Primary School			1			
Goldsborough H&N Svc Ltd			18	99	4	
Churchill Contracts Baces			1			
Churchill Contracts Day Centre	2		2	1		
Capital City Academy	53		68	11	3	4
North West London Jewish Day School		1	12	4		
Newman Catholic College	51		40	16	2	11
Kilburn Park School	16	1	24	1		4
Malorees Junior School	22		4	8		2
St Josephs Rc Primary School	55		31	15	5	6
Preston Manor High School			35	17	2	1
St Gregorys Rc School			5	13		
Copland Community School	9	1	27	33	1	
Convent Of Jesus & Mary Infant School	32		40	14	3	2
Claremont High School			17	12		1
Alperton High School			33	22		
Oakington Manor	13		13	7	1	1
John Kelly Girls Technology College			6	7		
John Kelly Boys Technology College			15	2	1	1
Kingsbury High School			67	44	3	9
Queens Park Community School			24	10	1	4
National Autistic Society	40	3	120	106	6	3
Kilburn Skills			3	10	1	
Sudbury Neighbourhood Centre	10		6	16		
Brent Samaritans				1		
Brent Crossroads				2		
Pakistani Workers Association				1	1	

Brent Association Disabled People			1	3		
Harlesden Young Mums Project				2		
Harlesden Methodist Day Nursery						
Wise				1	2	
Sudbury Primary School	113		5	2		6
Leap	7		2	1		
Childcare				2		
Carequest				1		
Islamia Primary School	62		23	2		3
Claremont High School Academy	82		12	1		5
Brent Care At Home Ltd	1		9	73	8	
JFS School	73		26	12	1	4
Brent Housing Partnership Ltd			6	2		3
Wetton Clean Svc North Wembley				3		
Wetton Clean Svc South Wembley			1	1		
Jarvis Workspace Fm Ltd			1	1		
Wembley High Technology College	31		17	4	1	11
Willow Housing & Care Ltd	1					
Sanctuary Housing Association			1			
Alperton Community School	91		41	12	1	15
Furness Primary School	34		8	3		3
Oakington Manor Primary School	67		8	1		10
Queens Park Community School	56		19	6		7
The Crest Boys Academy			12	6		
The Crest Girls Academy			6	3		
Xerox UK Limited	1					
Capita						
Apleona Hsg Ltd	6		5	2		
Thames Reach Housing Ass			1			
Mount Stewart Jm School	37		9	4		5
Braintcroft Primary School	27		1	1		4
Brentfield Primary School	81		7	2		6
Carlton Vale Infant School	20		8	2		4
Christchurch CE Primary School	16		4	1		
Elsley Primary School	40		8	3		5
Gladstone Park Primary School				1		
Kingsbury Green Primary School	76		7	1		5
St Margarets Clitheroe School	22		2	8		1
College Green Nursery	18		2			3
Wykeham Primary School	30					
Vernon House				1		

Leopold School	90		11			14
St Andrew & St Francis Academy	41		2	1		
Veolia	45		10	10	1	
Veolia Ground Maintenance	2		1			
Conway Aecom Ltd	5		1			
Barnardos	31		16	2		3
Michaela Community School Academy	29		4	1		3
Preston Manor High School Academy	122		71	5		22
Ark Franklin Primary School	41		9	1		15
Convent Of Jesus & Mary Language College	39	1	18	2		4
Gladstone Park Primary School	62		13	4	2	4
Kingsbury High School Academy	143		15	4		16
The Crest Academy	55		12	3		5
Woodfield School Academy	26		9			14
North West London Jewish Day School Academy	29			3	1	1
St Gregorys Rc School Academy	38		13	3		4
Manor Park Academy	2					
Taylor Shaw	2		1			
Manor School Academy	102		5	2	1	6
Caterlink Ltd	2		1			
Anson Primary School	26		8	1		
Barham Primary School	56		7			6
Byron Court	35		3	1		1
Chalkhill Primary School	60		5			1
Curzon Crescent Children's Centre	21			1		1
Donnington Primary School	27		1	1		2
Fawood Children's Centre	25					
Fryent Primary School	57		3	4		3
Granville Childrens Centre	26		2			1
John Keeble CE School	39		1			
Lyon Park Infants School			2			
Lyon Park Juniors School	48		4	1		3
Malorees Infant School	26		2	1		1
Michael Sobell Sinai School	47		8			1
Mitchell Brook Primary School	63		10			4
Mora Primary School	19		2	1		2
Mount Stewart Infants	29		6			1
Newfield Primary School	25		8	2		
Northview Primary School	21	1	5			
Oliver Goldsmith	28		4			1
Our Lady Of Grace Rc Infants	19		1	2		

Our Lady Of Grace Rc Juniors	16		1			
Our Lady Of Lourdes Primary School	28		1			1
Park Lane Primary School	41		4	1		3
Phoenix Arch School Vernon House	13		2			1
Preston Park Primary	60		9	1		7
Princess Frederica CE Primary School	27		5			1
Roe Green Infant School	47		4			1
Roe Green Junior School	41		3			1
Salisbury Primary School	55		8			3
St Mary Magdalenes School	22			1		1
St Mary's CE School	21		3			1
St Mary's Rc School	17		1			5
St Robert Southwell Catholic School	45		4			1
Stonebridge Primary School	44		6	2		2
The Village School	145		19			6
Uxendon Manor School	40		1			1
Wembley Primary School	78		5			1
Harlesden Primary School	45		2			4
Compass Learning Partnership	27		2			2
St Joseph's Infant School	18		1			1
St Joseph's Junior School	18		1	1		1
	7044	29	7910	5931	1055	1169

c. Funding Strategy Statement

London Borough of Brent Pension Fund

Funding Strategy Statement

March 2020

Contents

Funding Strategy Statement PAGE

1	Introduction	100
2	Basic Funding issues	103
3	Calculating contributions for individual Employers	108
4	Funding strategy and links to investment strategy	121
5	Statutory reporting and comparison to other LGPS Funds	122

Appendices

Appendix A – Regulatory framework	124
Appendix B – Responsibilities of key parties	126
Appendix C – Key risks and controls	128
Appendix D – The calculation of Employer contributions	132
Appendix E – Actuarial assumptions	135
Appendix F – Glossary	139

1. Introduction

What is this document?

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

It has been prepared by the Administering Authority in collaboration with the Fund’s actuary, Hymans Robertson LLP, and after consultation with the Fund’s employers and investment adviser. It is effective from 31 March 2020.

What is the London Borough of Brent Pension Fund?

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

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

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

Why does the Fund need a Funding Strategy Statement?

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

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

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

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

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

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

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

How does the Fund and this FSS affect me?

This depends who you are:

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

What does the FSS aim to do?

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

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

How do I find my way around this document?

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

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

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

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

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

If you have any other queries please contact Ravinder Jassar in the first instance at e-mail address Ravinder.jassar@brent.gov.uk or on telephone number 0208 937 1487.

2. Basic Funding issues

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

How does the actuary calculate the required contribution rate?

In essence this is a three-step process:

- Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See [Appendix E](#) for more details of what assumptions we make to determine that funding target;
- Determine the time horizon over which the employer should aim to achieve that funding target. See the table in [3.3](#) and [Note \(c\)](#) for more details;
- Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See [2.3](#) below, and the table in [3.3 Note \(e\)](#) for more details.

What is each employer's contribution rate?

This is described in more detail in [Appendix D](#). Employer contributions are normally made up of two elements:

- a) the estimated cost of benefits being built up each year, after deducting the members' own contributions and including an allowance for administration expenses. This is referred to as the "Primary rate", and is expressed as a percentage of members' pensionable pay; plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "Secondary rate". In broad terms, payment of the Secondary rate is in respect of benefits already accrued at the valuation date. The Secondary rate may be expressed as a percentage of pay and/or a monetary amount in each year.

The rates for all employers are shown in the Fund's Rates and Adjustments Certificate, which forms part of the formal Actuarial Valuation Report. Employers' contributions are expressed as minima, with employers able to pay contributions at a higher rate. Account of any higher rate will be taken by the Fund actuary at subsequent valuations, i.e. will be reflected as a credit when next calculating the employer's contributions.

What different types of employer participate in the Fund?

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

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

The LGPS Regulations define various types of employer as follows:

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

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

Designating employers – some employers are able to participate in the LGPS via a resolution (and the Fund cannot refuse them entry where the resolution is passed). These employers can designate which of their employees are eligible to join the scheme.

Other employers are able to participate in the Fund via an admission agreement, and are referred to as ‘admission bodies’. These employers are generally those with a “community of interest” with another scheme employer – **community admission bodies** (“CAB”) or those providing a service on behalf of a scheme employer – **transferee admission bodies** (“TAB”). CABs will include housing associations and charities, TABs will generally be contractors. The Fund is able to set its criteria for participation by these employers and can refuse entry if the requirements as set out in the Fund’s admissions policy are not met. (NB The terminology CAB and TAB has been dropped from recent LGPS Regulations, which instead combine both under the single term ‘admission bodies’; however, we have retained the old terminology here as we consider it to be helpful in setting funding strategies for these different employers.

How does the calculated contribution rate vary for different employers?

All three steps above are considered when setting contributions (more details are given in [Section 3](#) and [Appendix D](#)).

1. The **funding target** is based on a set of assumptions about the future, (e.g. investment returns, inflation, pensioners’ life expectancies). If an employer is approaching the end of its participation in the Fund then its funding target may be set on a more prudent basis, so that its liabilities are less likely to be spread among other employers after its cessation;
2. The **time horizon** required is the period over which the funding target is achieved. Employers may be given a lower time horizon if they have a less permanent anticipated membership, or do not have tax-raising powers to increase contributions if investment returns under-perform; and
3. The **likelihood of achieving** the funding target over that time horizon will be dependent on the Fund’s view of the strength of employer covenant and its funding profile. Where an employer is considered to be weaker, then the required likelihood will be set higher, which in turn will increase the required contributions (and vice versa).

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

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

Costs of ill-health early retirements are covered in [3.7](#) and [3.8](#).

How is a funding level calculated?

An employer's "funding level" is defined as the ratio of:

- the market value of the employer's share of assets (see [Appendix D](#), section [D5](#), for further details of how this is calculated), to
- the value placed by the actuary on the benefits built up to date for the employer's employees and ex-employees (the "liabilities"). The Fund actuary agrees with the Administering Authority the assumptions to be used in calculating this value.

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

It is important to note that the funding level and deficit/surplus are only measurements at a particular point in time, on a particular set of assumptions about the future. Whilst we recognise that various parties will take an interest in these measures, for most employers the key issue is how likely it is that their contributions will be sufficient to pay for their members' benefits (when added to their existing asset share and anticipated investment returns).

In short, funding levels and deficits are short term high level risk measures, whereas contribution-setting is a longer term issue.

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

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

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

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

- The Fund provides invaluable financial security to local families, whether to those who formerly worked in the service of the local community who have now retired, or to their families after their death;
- The Fund must have the assets available to meet these retirement and death benefits, which in turn means that the various employers must each pay their own way. Lower contributions today

will mean higher contributions tomorrow: deferring payments does not alter the employer's ultimate obligation to the Fund in respect of its current and former employees;

- Each employer will generally only pay for its own employees and ex-employees (and their dependants), not for those of other employers in the Fund;
- The Fund strives to maintain reasonably stable employer contribution rates where appropriate and possible. However, a recent shift in regulatory focus means that solvency within each generation is considered by the Government to be a higher priority than stability of contribution rates;
- The Fund wishes to avoid the situation where an employer falls so far behind in managing its funding shortfall that its deficit becomes unmanageable in practice: such a situation may lead to employer insolvency and the resulting deficit falling on the other Fund employers. In that situation, those employers' services would in turn suffer as a result;
- Council contributions to the Fund should be at a suitable level, to protect the interests of different generations of council tax payers. For instance, underpayment of contributions for some years will need to be balanced by overpayment in other years; the council will wish to minimise the extent to which council tax payers in one period are in effect benefitting at the expense of those paying in a different period.

Overall, therefore, there is clearly a balance to be struck between the Fund's need for maintaining prudent funding levels, and the employers' need to allocate their resources appropriately. The Fund achieves this through various techniques which affect contribution increases to various degrees (see [3.1](#)). In deciding which of these techniques to apply to any given employer, the Administering Authority takes a view on the financial standing of the employer, i.e. its ability to meet its funding commitments and the relevant time horizon.

The Administering Authority will consider a risk assessment of that employer using a knowledge base which is regularly monitored and kept up-to-date. This database will include such information as the type of employer, its membership profile and funding position, any guarantors or security provision, material changes anticipated, etc.

For instance, where the Administering Authority has reasonable confidence that an employer will be able to meet its funding commitments, then the Fund will permit options such as stabilisation ([see 3.3 Note \(b\)](#)), a longer time horizon relative to other employers, and/or a lower likelihood of achieving their funding target. Such options will temporarily produce lower contribution levels than would otherwise have applied. This is permitted in the expectation that the employer will still be able to meet its obligations for many years to come.

On the other hand, where there is doubt that an employer will be able to meet its funding commitments or withstand a significant change in its commitments, then a higher funding target, and/or a shorter time horizon relative to other employers, and/or a higher likelihood of achieving the target may be required.

The Fund actively seeks employer input, including to its funding arrangements, through various means: see [Appendix A](#).

What approach has the Fund taken to dealing with uncertainty arising from the McCloud court case and its potential impact on the LGPS benefit structure?

The LGPS benefit structure from 1 April 2014 is currently under review following the Government's loss of the right to appeal the McCloud and other similar court cases. The courts have ruled that the 'transitional protections' awarded to some members of public service pension schemes when the schemes were reformed (on 1 April 2014 in the case of the LGPS) were unlawful on the grounds of age discrimination. At the time of writing, the Ministry of Housing, Communities and Local Government (MHCLG) has not provided any details of changes as a result of the case. However it is expected that benefits changes will be required and they will likely increase the value of liabilities. At present, the scale and nature of any increase in liabilities are unknown, which limits the ability of the Fund to make an accurate allowance.

[The LGPS Scheme Advisory Board \(SAB\) issued advice to LGPS funds in May 2019](#). As there was no finalised outcome of the McCloud case by 31 August 2019, the Fund Actuary has acted in line with SAB's advice and valued all member benefits in line with the current LGPS Regulations.

The Fund, in line with the advice in the SAB's note, has considered how to allow for this risk in the setting of employer contribution rates. As the benefit structure changes that will arise from the McCloud judgement are uncertain, the Fund has elected to make an approximate allowance for the potential impact in the assessment of employer contribution rates at the 2019 valuation: this will be achieved by building in a slightly higher required likelihood of reaching funding target, all other things being equal.

The fund will reassess the employer contribution rates at the next formal valuation of the Fund. If the outcome of the McCloud case is then known, a more accurate allowance for the impact will be made at that time.

The Fund has also considered the McCloud judgement in its approach to cessation valuations. Please see note (j) to table 3.3 for further information.

When will the next actuarial valuation be?

On 8 May 2019 MHCLG issued a [consultation](#) seeking views on (among other things) proposals to amend the LGPS valuation cycle in England and Wales from a three year (triennial) valuation cycle to a four year (quadrennial) valuation cycle.

The Fund intends to carry out its next actuarial valuation in 2022 (3 years after the 2019 valuation date) in line with MHCLG's desired approach in the consultation. The Fund has therefore instructed the Fund Actuary to certify contribution rates for employers for the period 1 April 2020 to 31 March 2023 as part of the 2019 valuation of the Fund.

3. Calculating contributions for individual Employers

General comments

A key challenge for the Administering Authority is to balance the need for stable, affordable employer contributions with the requirement to take a prudent, longer-term view of funding and ensure the solvency of the Fund. With this in mind, the Fund's three-step process identifies the key issues:

1. What is a suitably (but not overly) prudent funding target?
2. How long should the employer be permitted to reach that target? This should be realistic but not so long that the funding target is in danger of never actually being achieved.
3. What likelihood is required to reach that funding target? This will always be less than 100% as we cannot be certain of the future. Higher likelihood "bars" can be used for employers where the Fund wishes to reduce the risk that the employer ceases leaving a deficit to be picked up by other employers.

These and associated issues are covered in this Section.

The Administering Authority recognises that there may occasionally be particular circumstances affecting individual employers that are not easily managed within the rules and policies set out in the Funding Strategy Statement. Therefore the Administering Authority reserves the right to direct the actuary to adopt alternative funding approaches on a case by case basis for specific employers.

The effect of paying lower contributions

In limited circumstances the Administering Authority may permit employers to pay contributions at a lower level than is assessed for the employer using the three step process above. At their absolute discretion the Administering Authority may:

- extend the time horizon for targeting full funding;
- adjust the required likelihood of meeting the funding target;
- permit an employer to participate in the Fund's stabilisation mechanisms;
- permit extended phasing in of contribution rises or reductions;
- pool contributions amongst employers with similar characteristics; and/or
- accept some form of security or guarantee in lieu of a higher contribution rate than would otherwise be the case.

Employers which are permitted to use one or more of the above methods will often be paying, for a time, contributions less than required to meet their funding target, over the appropriate time horizon with the required likelihood of success. Such employers should appreciate that:

- their true long term liability (i.e. the actual eventual cost of benefits payable to their employees and ex-employees) is not affected by the pace of paying contributions;
- lower contributions in the short term will result in a lower level of future investment returns on the employer's asset share. Thus, deferring a certain amount of contribution may lead to higher contributions in the long-term; and

- it may take longer to reach their funding target, all other things being equal.

Overleaf [\(3.3\)](#) is a summary of how the main funding policies differ for different types of employer, followed by more detailed notes where necessary.

[Section 3.4](#) onwards deals with various other funding issues which apply to all employers.

The different approaches used for different employers

Type of employer	Scheduled Bodies			Community Admission Bodies and Designating Employers		Transferee Admission Bodies
	Local Authorities	Academies	Other	Open to new entrants	Closed to new entrants	(all)
Funding Target Basis used	Ongoing participation basis, assumes long-term Fund participation (see Appendix E)			Ongoing participation basis, but may move to “gilts exit basis” - see Note (a)		Contractor exit basis, assumes fixed contract term in the Fund (see Appendix E)
Primary rate approach	(see Appendix D – D.2)					
Stabilised contribution rate?	Yes - see Note (b)	Yes - see Note (b)	No	No	No	No
Maximum time horizon – Note (c)	19 years	19 years	19 years	19 years	Future working lifetime of actives	As per letting employer
Secondary rate – Note (d)	% of payroll	% of payroll	Monetary	Monetary	Monetary	Monetary
Treatment of surplus	Covered by stabilisation arrangement		Preferred approach: contributions kept at Primary rate. However, reductions may be permitted by the Administering Authority		Reduce contributions by spreading the surplus over the remaining contract term if less than 4 years, else no reduction	
Likelihood of achieving target – Note (e)	70%	75%	70%	75%	80%	70%
Phasing of contribution changes	Covered by stabilisation arrangement		3 years	3 years	3 years	None
Review of rates – Note (f)	Administering Authority reserves the right to review contribution rates and amounts, and the level of security provided, at regular intervals between valuations					Particularly reviewed in last 3 years of contract
New employer	n/a	Note (g)	n/a	Note (h)		Notes (h) & (i)
Cessation of participation: exit debt/credit payable	Cessation is assumed not to be generally possible, as Scheduled Bodies are legally obliged to participate in the LGPS. In the rare event of cessation occurring (machinery of Government changes for example), the cessation calculation principles applied would be as per Note (j) .			Can be ceased subject to terms of admission agreement. Exit debt/credit will be calculated on a basis appropriate to the circumstances of cessation – see Note (j) .		Participation assumed to expire at end of contract. Cessation debt/credit calculated on the contractor exit basis, unless the admission agreement is terminated early by the contractor in which case low risk basis would apply. Letting employer

HYMANS ROBERTSON LLP

			liable for future deficits and contributions arising. See Note (i) for further details
--	--	--	--

Note (a) (Gilts exit basis for CABs and Designating Employers closed to new entrants)

In the circumstances where:

- the employer is a Designating Employer, or an Admission Body but not a Transferee Admission Body, and
- the employer has no guarantor, and
- the admission agreement is likely to terminate, or the employer is likely to lose its last active member, within a timeframe considered appropriate by the Administering Authority to prompt a change in funding,

the Administering Authority may set a higher funding target (e.g. based on the return from long term gilt yields) by the time the agreement terminates or the last active member leaves, in order to protect other employers in the Fund. This policy will increase regular contributions and reduce, but not entirely eliminate, the possibility of a final deficit payment being required from the employer when a cessation valuation is carried out.

The Administering Authority also reserves the right to adopt the above approach in respect of those Designating Employers and Admission Bodies with no guarantor, where the strength of covenant is considered to be weak but there is no immediate expectation that the admission agreement will cease or the Designating Employer alters its designation.

Note (b) (Stabilisation)

Stabilisation is a mechanism where employer contribution rate variations from year to year are kept within a pre-determined range, thus allowing those employers' rates to be relatively stable. In the interests of stability and affordability of employer contributions, the Administering Authority, on the advice of the Fund Actuary, believes that stabilising contributions can still be viewed as a prudent longer-term approach. However, employers whose contribution rates have been "stabilised" (and may therefore be paying less than their theoretical contribution rate) should be aware of the risks of this approach and should consider making additional payments to the Fund if possible.

This stabilisation mechanism allows short term investment market volatility to be managed so as not to cause volatility in employer contribution rates, on the basis that a long term view can be taken on net cash inflow, investment returns and strength of employer covenant.

The current stabilisation mechanism applies if:

- the employer satisfies the eligibility criteria set by the Administering Authority (see below) and;
- there are no material events which cause the employer to become ineligible, e.g. significant reductions in active membership (due to outsourcing or redundancies), or changes in the nature of the employer (perhaps due to Government restructuring), or changes in the security of the employer.

Currently the only eligible Fund employer is the London Borough of Brent's Council Pool, although Academies will pay the same rate as the Council for at least the three years beginning 1 April 2020 (see Note (g)).

On the basis of extensive modelling carried out for the 2019 valuation exercise (see [Section 4](#)), the current stabilised rate for the Council Pool is a total contribution rate 35.0%, payable for the three years beginning 1 April 2020.

The stabilisation criteria and limits will be reviewed at the next formal valuation. This will take into account the Council's membership profile, whether stabilisation should continue to apply (and if so, whether this should be extended to other employers), and other relevant factors.

Note (c) (Maximum time horizon)

The maximum time horizon starts at the commencement of the revised contribution rate (1 April 2020 for the 2019 valuation). The Administering Authority would normally expect the same period to be used at successive triennial valuations, but would reserve the right to propose alternative time horizons, for example where there were no new entrants.

For employers with no (or very few) active members at this valuation, the deficit should be recovered by a fixed monetary amount over a period to be agreed with the body or its successor, typically not to exceed 3 years.

Note (d) (Secondary rate)

The Secondary contributions for each employer are typically expressed in monetary terms (as opposed to percentage of payroll). This is to avoid the situation where a stagnating or falling payroll results in insufficient secondary contributions being made over the three year period.

For certain employers, at the Administering Authority's discretion but currently including all Academies, these payments may instead be set as a percentage of salaries. However, the Administering Authority reserves the right to amend these rates between valuations and/or to require these payments in monetary terms instead, for instance where:

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

Note (e) Likelihood of achieving funding target)

Each employer has its funding target calculated, and a relevant time horizon over which to reach that target. Contributions are set such that, combined with the employer's current asset share and anticipated market movements over the time horizon, the funding target is achieved with a given minimum likelihood. A higher required likelihood bar will give rise to higher required contributions, and vice versa.

The way in which contributions are set using these three steps, and relevant economic projections, is described in further detail in [Appendix D](#).

Different likelihoods are set for different employers depending on their nature and circumstances: in broad terms, a higher likelihood will apply due to one or more of the following:

- the Fund believes the employer poses a greater funding risk than other employers,
- the employer does not have tax-raising powers;

- the employer does not have a guarantor or other sufficient security backing its funding position; and/or
- the employer is likely to cease participation in the Fund in the short or medium term.

Note (f) (Regular Reviews)

Such reviews may be triggered by significant events including but not limited to: significant reductions in payroll, altered employer circumstances, Government restructuring affecting the employer's business, or failure to pay contributions or arrange appropriate security as required by the Administering Authority.

The result of a review may be to require increased contributions (by strengthening the actuarial assumptions adopted and/or moving to monetary levels of deficit recovery contributions), and/or an increased level of security or guarantee.

Note (g) (New Academy conversions)

At the time of writing, the Fund's policies on academies' funding issues are as follows:

- i. The new academy will be regarded as a separate employer in its own right and will not be pooled with other employers in the Fund. The only exception is where the academy is part of a Multi Academy Trust (MAT) in which case the academy's figures will be calculated as below but can be combined with, for the purpose of setting contribution rates, those of the other academies in the MAT;
- ii. The new academy's past service liabilities on conversion will be calculated based on its active Fund members on the day before conversion. For the avoidance of doubt, these liabilities will include all past service of those members, but will exclude the liabilities relating to any ex-employees of the school who have deferred or pensioner status;
- iii. The new academy will be allocated an initial asset share from the ceding council's assets in the Fund. This asset share will be calculated using the estimated funding position of the ceding council at the date of academy conversion. The share will be based on the active members' funding level, having first allocated assets in the council's share to fully fund deferred and pensioner members. The assets allocated to the academy will be limited if necessary so that its initial funding level is subject to a maximum of 100%. The asset allocation will be based on market conditions and the academy's active Fund membership on the day prior to conversion;
- iv. The new academy's calculated contribution rate will be based on the time horizon and likelihood of achieving funding target outlined for Academies in the table in Section [3.3](#) above;
- v. The new academy's actual contribution rate will be as per the Council rate, expressed purely as a percentage of pensionable pay. This applies whether or not the theoretical rate is above the Council rate. All other things being equal, this will mean some academies taking longer to pay off their deficit (where the theoretical rate is higher than the Council rate), or paying off the deficit more quickly (where the theoretical rate is below the Council rate).

The Fund's policies on academies are subject to change in the light of any amendments to MHCLG and/or DfE guidance or removal of the formal guarantee currently provided to academies by the DfE. Any changes will be notified to academies, and will be reflected in a subsequent version of this FSS. In particular, policies (iv) and (v) above will be reconsidered at each valuation.

Note (h) (New Admission Bodies)

With effect from 1 October 2012, the LGPS 2012 Miscellaneous Regulations introduced mandatory new requirements for all Admission Bodies brought into the Fund from that date. Under these Regulations, all new Admission Bodies will be required to provide some form of security, such as a guarantee from the letting employer, an indemnity or a bond. The security is required to cover some or all of the following:

- the strain cost of any redundancy early retirements resulting from the premature termination of the contract;
- allowance for the risk of asset underperformance;
- allowance for the risk of a greater than expected rise in liabilities;
- allowance for the possible non-payment of employer and member contributions to the Fund; and/or
- the current deficit.

Transferee Admission Bodies: For all TABs, the security must be to the satisfaction of the Administering Authority as well as the letting employer, and will be reassessed on an annual basis. See also [Note \(i\)](#) below.

Community Admission Bodies: The Administering Authority will only consider requests from CABs (or other similar bodies, such as section 75 NHS partnerships) to join the Fund if they are sponsored by a Scheduled Body with tax raising powers, guaranteeing their liabilities and also providing a form of security as above.

The above approaches reduce the risk, to other employers in the Fund, of potentially having to pick up any shortfall in respect of Admission Bodies ceasing with an unpaid deficit.

Note (i) (New Transferee Admission Bodies)

A new TAB usually joins the Fund as a result of the letting/outsourcing of some services from an existing employer (normally a Scheduled Body such as a council or academy) to another organisation (a “contractor”). This involves the TUPE transfer of some staff from the letting employer to the contractor. Consequently, for the duration of the contract, the contractor is a new participating employer in the Fund so that the transferring employees maintain their eligibility for LGPS membership. At the end of the contract the employees revert to the letting employer or to a replacement contractor.

Ordinarily, the TAB would be set up in the Fund as a new employer with responsibility for all the accrued benefits of the transferring employees; in this case, the contractor would usually be assigned an initial asset allocation equal to the past service liability value of the employees’ Fund benefits. The quid pro quo is that the contractor is then expected to ensure that its share of the Fund is also fully funded at the end of the contract: see [Note \(j\)](#).

Employers which “outsource” have flexibility in the way that they can deal with the pension risk potentially taken on by the contractor. In particular there are three different routes that such employers may wish to adopt. Clearly as the risk ultimately resides with the employer letting the contract, it is for them to agree the appropriate route with the contractor:

- i) Pooling

Under this option the contractor is pooled with the letting employer. In this case, the contractor pays the same rate as the letting employer, which may be under a stabilisation approach.

ii) Letting employer retains pre-contract risks

Under this option the letting employer would retain responsibility for assets and liabilities in respect of service accrued prior to the contract commencement date. The contractor would be responsible for the future liabilities that accrue in respect of transferred staff. The contractor's contribution rate could vary from one valuation to the next. It would be liable for any deficit (or entitled to any surplus) at the end of the contract term in respect of assets and liabilities attributable to service accrued during the contract term. Please note, the level of exit credit payable would be determined by the Administering Authority in accordance with the Regulations.

iii) Fixed contribution rate agreed

Under this option the contractor pays a fixed contribution rate throughout its participation in the Fund and on cessation does not pay any deficit or receive an exit credit. In other words, the pension risks "pass through" to the letting employer.

The Administering Authority is willing to administer any of the above options as long as the approach is documented in the Admission Agreement as well as the transfer agreement. Any risk sharing agreement should ensure that some element of risk transfers to the contractor where it relates to their decisions and it is unfair to burden the letting employer with that risk. For example the contractor should typically be responsible for pension costs that arise from:

- above average pay increases, including the effect in respect of service prior to contract commencement even if the letting employer takes on responsibility for the latter under (ii) above; and
- redundancy and early retirement decisions.

redundancy and early retirement decisions.

Note (j) (Admission Bodies Ceasing)

Notwithstanding the provisions of the Admission Agreement, the Administering Authority may consider any of the following as triggers for the cessation of an admission agreement with any type of body:

- Last active member ceasing participation in the Fund (NB recent LGPS Regulation changes mean that the Administering Authority has the discretion to defer taking action for up to three years, so that if the employer acquires one or more active Fund members during that period then cessation is not triggered. The current Fund policy is that this is left as a discretion and may or may not be applied in any given case);
- The insolvency, winding up or liquidation of the Admission Body;
- Any breach by the Admission Body of any of its obligations under the Agreement that they have failed to remedy to the satisfaction of the Fund;

- A failure by the Admission Body to pay any sums due to the Fund within the period required by the Fund; or
- The failure by the Admission Body to renew or adjust the level of the bond or indemnity, or to confirm an appropriate alternative guarantor, as required by the Fund.

On cessation, the Administering Authority will instruct the Fund actuary to carry out a cessation valuation to determine whether there is any deficit or surplus. Where there is a deficit, payment of this amount in full would normally be sought from the Admission Body; where there is a surplus, the Administering Authority will determine the amount of exit credit to be paid in accordance with the Regulations. In making this determination, the Administering Authority will consider the extent of any surplus, the proportion of surplus arising as a result of the Admission Body's employer contributions, any representations (such as risk sharing agreements or guarantees) made by the Admission Body and any employer providing a guarantee to the Admission Body.

As discussed in Section 0, the LGPS benefit structure from 1 April 2014 is currently under review following the Government's loss of the right to appeal the McCloud and other similar court cases. The Fund has considered how it will reflect the current uncertainty regarding the outcome of this judgement in its approach to cessation valuations. For cessation valuations that are carried out before any changes to the LGPS benefit structure (from 1 April 2014) are confirmed, the Fund's policy is that the actuary will apply a [x%] loading to the ceasing employer's post 2014 benefit accrual value, as an estimate of the possible impact of resulting benefit changes.

For non-Transferee Admission Bodies whose participation is voluntarily ended either by themselves or the Fund, or where a cessation event has been triggered, the Administering Authority must look to protect the interests of other ongoing employers. The actuary will therefore adopt an approach which, to the extent reasonably practicable, protects the other employers from the likelihood of any material loss emerging in future:

- (a) Where a guarantor does not exist then, in order to protect other employers in the Fund, the cessation liabilities and final surplus/deficit will normally be calculated using a "gilts exit basis", which is more prudent than the ongoing participation basis. This has no allowance for potential future investment outperformance above gilt yields, and has added allowance for future improvements in life expectancy. This could give rise to significant cessation debts being required.
- (b) Where there is a guarantor for future deficits and contributions, the details of the guarantee will be considered prior to the cessation valuation being carried out. In some cases the guarantor is simply guarantor of last resort and therefore the cessation valuation will be carried out consistently with the approach taken had there been no guarantor in place. Alternatively, where the guarantor is not simply guarantor of last resort, the cessation may be calculated using the ongoing participation basis or contractor exit basis as described in [Appendix E](#);
- (c) Again, depending on the nature of the guarantee, it may be possible to simply transfer the former Admission Body's liabilities and assets to the guarantor, without needing to crystallise any deficit or surplus. This approach may be adopted where the employer cannot pay the contributions due, and this is within the terms of the guarantee.

Under (a) and (b), any shortfall would usually be levied on the departing Admission Body as a single lump sum payment. If this is not possible then the Fund may spread they payment subject to there being some security in place for the employer such as a bond indemnity or guarantee.

In the event that the Fund is not able to recover the required payment in full, then the unpaid amounts fall to be shared amongst all of the other employers in the Fund. This may require an immediate revision to the Rates and Adjustments Certificate affecting other employers in the Fund, or instead be reflected in the contribution rates set at the next formal valuation following the cessation date.

As an alternative, where the ceasing Admission Body is continuing in business, the Fund at its absolute discretion reserves the right to enter into an agreement with the ceasing Admission Body. Under this agreement the Fund would accept an appropriate alternative security to be held against any deficit on the gilts exit basis, and would carry out the cessation valuation on the ongoing participation basis. Secondary contributions would be derived from this cessation debt. This approach would be monitored as part of each formal valuation and secondary contributions would be reassessed as required. The Admission Body may terminate the agreement only via payment of the outstanding debt assessed on the gilts exit basis. Furthermore,, the Fund reserves the right to revert to the “gilts exit basis” and seek immediate payment of any funding shortfall identified. The Administering Authority may need to seek legal advice in such cases, as the Admission Body would have no contributing members.

Pooled contributions

From time to time, with the advice of the Actuary, the Administering Authority may set up pools for employers with similar or complementary characteristics. This will always be in line with its broader funding strategy. The current pools in place within the Fund are as follows:

- LEA schools generally are also pooled with the Council. However there may be exceptions for specialist or independent schools.
- Academy schools may be pooled within their Multi Academy Trust (if this applies).
- Smaller Transferee Admission Bodies may be pooled with the letting employer, provided all parties (particularly the letting employer) agree.

The intention of the pool is to minimise contribution rate volatility which would otherwise occur when members join, leave, take early retirement, receive pay rises markedly different from expectations, etc. Such events can cause large changes in contribution rates for very small employers in particular, unless these are smoothed out for instance by pooling across a number of employers.

On the other hand it should be noted that the employers in the pool will still have their own individual funding positions tracked by the Actuary, so that some employers will be much better funded, and others much more poorly funded, than the pool average. This therefore means that if any given employer was funding on a stand-alone basis, as opposed to being in the pool, then its contribution rate could be much higher or lower than the pool contribution rate.

It should also be noted that, if an employer is considering ceasing from the Fund, its required contributions would be based on its own funding position (rather than the pool average), and the cessation terms would also apply: this would mean potentially very different (and in particular possibly much higher) contributions would be required from the employer in that situation.

Those employers which have been pooled are identified in the Rates and Adjustments Certificate.

Employers who are permitted to enter (or remain in) a pool at the 2019 valuation will not normally be advised of their individual contribution rate unless agreed by the Administering Authority.

Community Admission Bodies that are deemed by the Administering Authority to have closed to new entrants are not usually permitted to participate in a pool.

Additional flexibility in return for added security

The Administering Authority may permit greater flexibility to the employer's contributions if the employer provides added security to the satisfaction of the Administering Authority.

Such flexibility includes a reduced rate of contribution, an extended time horizon, or permission to join a pool with another body (e.g. the Local Authority).

Such security may include, but is not limited to, a suitable bond, a legally-binding guarantee from an appropriate third party, or security over an employer asset of sufficient value.

The degree of flexibility given may take into account factors such as:

- the extent of the employer's deficit;
- the amount and quality of the security offered;
- the employer's financial security and business plan; and
- whether the admission agreement is likely to be open or closed to new entrants.

Non ill health early retirement costs

It is assumed that members' benefits are payable from the earliest age that the employee could retire without incurring a reduction to their benefit (and without requiring their employer's consent to retire). (**NB** the relevant age may be different for different periods of service, following the benefit changes from April 2008 and April 2014). Employers are required to pay additional contributions ('strain') wherever an employee retires before attaining this age. The actuary's funding basis makes no allowance for premature retirement except on grounds of ill-health.

Employers must make these additional contributions as a one off payment to the Fund in the financial year following the award of an early retirement. In exceptional circumstances, the Administering Authority may at its absolute discretion agree to spread the payment over a period not exceeding three years. If this is agreed, interest will be charged using factors provided by the actuary.

Ill health early retirement costs

In the event of a member's early retirement on the grounds of ill-health, a funding strain will usually arise, which can be very large. Such strains are currently met by each employer, although individual employers may elect to take external insurance (see [3.8](#) below).

The cumulative cost of ill health retirements between actuarial valuations will in effect be reflected in the employer's results at the next valuation.

Where a different approach is adopted (eg regularly monitoring ill health experience and requesting contributions between valuations), details will be included in each that employer's Admission Agreement.

External Ill health insurance

If an employer provides satisfactory evidence to the Administering Authority of a current external insurance policy covering ill health early retirement strains, then:

- the employer's contribution to the Fund each year is reduced by the amount of that year's insurance premium, so that the total contribution is unchanged, and

- there is no need for monitoring of allowances.

The employer must keep the Administering Authority notified of any changes in the insurance policy's coverage or premium terms, or if the policy is ceased.

Employers with no remaining active members

In general an employer ceasing in the Fund, due to the departure of the last active member, will pay a cessation debt or receive an exit credit on an appropriate basis (see [3.3, Note \(j\)](#)) and consequently have no further obligation to the Fund. Thereafter it is expected that one of two situations will eventually arise:

- a) The employer's asset share runs out before all its ex-employees' benefits have been paid. In this situation the other Fund employers will be required to contribute to pay all remaining benefits: this will be done by the Fund actuary apportioning the remaining liabilities on a pro-rata basis at successive formal valuations;
- b) The last ex-employee or dependant dies before the employer's asset share has been fully utilised. In this situation the remaining assets would be apportioned pro-rata by the Fund's actuary to the other Fund.

In exceptional circumstances the Fund may permit an employer with no remaining active members and a cessation deficit to continue contributing to the Fund. This would require the provision of a suitable security or guarantee, as well as a written ongoing commitment to fund the remainder of the employer's obligations over an appropriate period. The Fund would reserve the right to invoke the cessation requirements in the future, however. The Administering Authority may need to seek legal advice in such cases, as the employer would have no contributing members.

Policies on bulk transfers

The Fund has a separate written policy which covers bulk transfer payments into, out of and within the Fund. Each case will be treated on its own merits, but in general:

- The Fund will not pay bulk transfers greater than the lesser of (a) the asset share of the transferring employer in the Fund, and (b) the value of the past service liabilities of the transferring members;
- The Fund will not grant added benefits to members bringing in entitlements from another Fund unless the asset transfer is sufficient to meet the added liabilities; and
- The Fund may permit shortfalls to arise on bulk transfers if the Fund employer has suitable strength of covenant and commits to meeting that shortfall in an appropriate period. This may require the employer's Fund contributions to increase between valuations.
- Active members switching employment from one Fund employer to another will result in assets equal to the past service liabilities being reallocated between the employers, i.e. a "fully funded transfer". This means that the deficit at the point of transfer is retained by the ceding employer.

However, in the case of schools converting to academy status (i.e. the members switch from Council employment to the new Academy); the process is instead as per Note (g) to section 3.3 above. This is because the guidance from the Department for Education and the Department for Communities and Local Government anticipates that the past service deficit will be inherited by the new Academy.

4. Funding strategy and links to investment strategy

What is the Fund's investment strategy?

The Fund has built up assets over the years, and continues to receive contribution and other income. All of this must be invested in a suitable manner, which is the investment strategy.

Investment strategy is set by the Administering Authority, after consultation with the employers and after taking investment advice. The precise mix, manager make up and target returns are set out in the Investment Strategy Statement, which is available to members and employers.

The investment strategy is set for the long-term, but is reviewed from time to time. Normally a full review is carried out as part of each actuarial valuation, and is kept under review annually between actuarial valuations to ensure that it remains appropriate to the Fund's liability profile.

The same investment strategy is currently followed for all employers.

What is the link between funding strategy and investment strategy?

The Fund must be able to meet all benefit payments as and when they fall due. These payments will be met by contributions (resulting from the funding strategy) or asset returns and income (resulting from the investment strategy). To the extent that investment returns or income fall short, then higher cash contributions are required from employers, and vice versa

Therefore, the funding and investment strategies are inextricably linked.

How does the funding strategy reflect the Fund's investment strategy?

In the opinion of the Fund actuary, the current funding policy is consistent with the current investment strategy of the Fund. The actuary's assumptions for future investment returns (described further in Appendix E) are based on the current benchmark investment strategy of the Fund. The future investment return assumptions underlying each of the fund's three funding bases include a margin for prudence, and are therefore also considered to be consistent with the requirement to take a "prudent longer-term view" of the funding of liabilities as required by the UK Government (see Appendix [A1](#)).

In the short term – such as the three yearly assessments at formal valuations – there is the scope for considerable volatility in asset values. However, the actuary takes a long term view when assessing employer contribution rates and the contribution rate setting methodology takes into account this potential variability.

The Fund does not hold a contingency reserve to protect it against the volatility of equity investments.

Does the Fund monitor its overall funding position?

The Administering Authority monitors the relative funding position, i.e. changes in the relationship between asset values and the liabilities value, quarterly. It reports this to the regular Pensions Committee meetings, and also to employers through newsletters and Employers Forums.

5. Statutory reporting and comparison to other LGPS Funds

Purpose

Under Section 13(4)(c) of the Public Service Pensions Act 2013 (“Section 13”), the Government Actuary’s Department must, following each triennial actuarial valuation, report to MHCLG on each of the LGPS Funds in England & Wales. This report will cover whether, for each Fund, the rate of employer contributions are set at an appropriate level to ensure both the solvency and the long term cost efficiency of the Fund.

This additional MHCLG oversight may have an impact on the strategy for setting contribution rates at future valuations.

Solvency

For the purposes of Section 13, the rate of employer contributions shall be deemed to have been set at an appropriate level to ensure solvency if:

- (a) the rate of employer contributions is set to target a funding level for the Fund of 100%, over an appropriate time period and using appropriate actuarial assumptions (where appropriateness is considered in both absolute and relative terms in comparison with other funds); and either
- (b) employers collectively have the financial capacity to increase employer contributions, and/or the Fund is able to realise contingent assets should future circumstances require, in order to continue to target a funding level of 100%; or
- (c) there is an appropriate plan in place should there be, or if there is expected in future to be, a material reduction in the capacity of fund employers to increase contributions as might be needed.

Long Term Cost Efficiency

The rate of employer contributions shall be deemed to have been set at an appropriate level to ensure long term cost efficiency if:

- i. the rate of employer contributions is sufficient to make provision for the cost of current benefit accrual,
- ii. with an appropriate adjustment to that rate for any surplus or deficit in the Fund.

In assessing whether the above condition is met, MHCLG may have regard to various absolute and relative considerations. A relative consideration is primarily concerned with comparing LGPS pension funds with other LGPS pension funds. An absolute consideration is primarily concerned with comparing Funds with a given objective benchmark.

Relative considerations include:

- 1. the implied deficit recovery period; and
- 2. the investment return required to achieve full funding after 20 years.

Absolute considerations include:

1. the extent to which the contributions payable are sufficient to cover the cost of current benefit accrual and the interest cost on any deficit;
2. how the required investment return under “relative considerations” above compares to the estimated future return being targeted by the Fund’s current investment strategy;
3. the extent to which contributions actually paid have been in line with the expected contributions based on the extant rates and adjustment certificate; and
4. the extent to which any new deficit recovery plan can be directly reconciled with, and can be demonstrated to be a continuation of, any previous deficit recovery plan, after allowing for actual Fund experience.

MHCLG may assess and compare these metrics on a suitable standardised market-related basis, for example where the local funds’ actuarial bases do not make comparisons straightforward.

Appendix A – Regulatory framework

A1 Why does the Fund need an FSS?

The Ministry of Housing, Communities and Local Government (MHCLG) has stated that the purpose of the FSS is:

*“to establish a **clear and transparent fund-specific strategy** which will identify how employers’ pension liabilities are best met going forward;*

*to support the regulatory framework to maintain **as nearly constant employer contribution rates as possible**; and*

*to take a **prudent longer-term view** of funding those liabilities.”*

These objectives are desirable individually, but may be mutually conflicting.

The requirement to maintain and publish a FSS is contained in LGPS Regulations which are updated from time to time. In publishing the FSS the Administering Authority has to have regard to any guidance published by Chartered Institute of Public Finance and Accountancy (CIPFA) (most recently in 2016) and to its Statement of Investment Principles / Investment Strategy Statement.

This is the framework within which the Fund’s actuary carries out triennial valuations to set employers’ contributions and provides recommendations to the Administering Authority when other funding decisions are required, such as when employers join or leave the Fund. The FSS applies to all employers participating in the Fund.

A2 Does the Administering Authority consult anyone on the FSS?

Yes. This is required by LGPS Regulations. It is covered in more detail by the most recent CIPFA guidance, which states that the FSS must first be subject to “consultation with such persons as the authority considers appropriate”, and should include “a meaningful dialogue at officer and elected member level with council tax raising authorities and with corresponding representatives of other participating employers”.

In practice, for the Fund, the consultation process for this FSS was as follows:

- a) A draft version of the FSS was issued to all participating employers in October 2019 for comment;
- b) Comments were requested to be received no later than 31st January 2020;
- c) There was an Employers Forum on 13th November 2019 at which questions regarding the FSS could be raised and answered;
- d) Following the end of the consultation period the FSS was updated where required and then published, in March 2020.

A3 How is the FSS published?

The FSS is made available through the following routes:

A full copy included in the annual report and accounts of the Fund;

A copy sent by e-mail to each participating employer in the Fund;

A copy sent to employee representatives;

A summary issued to all Fund members;

Copies sent to investment managers and independent advisers;

Copies made available on request.

A4 How often is the FSS reviewed?

The FSS is reviewed in detail at least every three years as part of the triennial valuation (which may move to every four years in future – see Section 2.8). This version is expected to remain unaltered until it is consulted upon as part of the formal process for the next valuation.

It is possible that (usually slight) amendments may be needed within the three year period. These would be needed to reflect any regulatory changes, or alterations to the way the Fund operates (e.g. to accommodate a new class of employer). Any such amendments would be consulted upon as appropriate:

- trivial amendments would be simply notified at the next round of employer communications,
- amendments affecting only one class of employer would be consulted with those employers,
- other more significant amendments would be subject to full consultation.

In any event, changes to the FSS would need agreement by the Pensions Committee and would be included in the relevant Committee Meeting minutes.

A5 How does the FSS fit into other Fund documents?

The FSS is a summary of the Fund's approach to funding liabilities. It is not an exhaustive statement of policy on all issues, for example there are a number of separate statements published by the Fund including the Investment Strategy Statement, Governance Strategy and Communications Strategy. In addition, the Fund publishes an Annual Report and Accounts with up to date information on the Fund.

These documents can be found on the web at

<https://www.brent.gov.uk/your-council/transparency-in-brent/performance-and-spending/budgets-and-finance/pensions/>.

Appendix B – Responsibilities of key parties

The efficient and effective operation of the Fund needs various parties to each play their part.

B1 The Administering Authority should:-

- operate the Fund as per the LGPS Regulations;
- effectively manage any potential conflicts of interest arising from its dual role as Administering Authority and a Fund employer;
- collect employer and employee contributions, and investment income and other amounts due to the Fund;
- ensure that cash is available to meet benefit payments as and when they fall due;
- pay from the Fund the relevant benefits and entitlements that are due;
- invest surplus monies (i.e. contributions and other income which are not immediately needed to pay benefits) in accordance with the Fund's Investment Strategy Statement (ISS) and LGPS Regulations;
- communicate appropriately with employers so that they fully understand their obligations to the Fund;
- take appropriate measures to safeguard the Fund against the consequences of employer default;
- manage the valuation process in consultation with the Fund's actuary;
- provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see [Section 5](#));
- prepare and maintain a FSS and a ISS, after consultation;
- notify the Fund's actuary of material changes which could affect funding (this is covered in a separate agreement with the actuary); and
- monitor all aspects of the fund's performance and funding and amend the FSS and ISS as necessary and appropriate.

B2 The Individual Employer should:-

- deduct contributions from employees' pay correctly;
- pay all contributions, including their own as determined by the actuary, promptly by the due date;
- have a policy and exercise discretions within the regulatory framework;
- make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits, early retirement strain; and
- notify the Administering Authority promptly of all changes to its circumstances, prospects or membership, which could affect future funding.

B3 The Fund Actuary should:-

- prepare valuations, including the setting of employers' contribution rates. This will involve agreeing assumptions with the Administering Authority, having regard to the FSS and LGPS Regulations, and targeting each employer's solvency appropriately;
- provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see [Section 5](#));

- provide advice relating to new employers in the Fund, including the level and type of bonds or other forms of security (and the monitoring of these);
- prepare advice and calculations in connection with bulk transfers and individual benefit-related matters;
- assist the Administering Authority in considering possible changes to employer contributions between formal valuations, where circumstances suggest this may be necessary;
- advise on the termination of employers' participation in the Fund; and
- fully reflect actuarial professional guidance and requirements in the advice given to the Administering Authority.

B4 Other parties:-

- investment advisers (either internal or external) should ensure the Fund's ISS remains appropriate, and consistent with this FSS;
- investment managers, custodians and bankers should all play their part in the effective investment (and dis-investment) of Fund assets, in line with the ISS;
- auditors should comply with their auditing standards, ensure Fund compliance with all requirements, monitor and advise on fraud detection, and sign off annual reports and financial statements as required;
- governance advisers may be appointed to advise the Administering Authority on efficient processes and working methods in managing the Fund;
- legal advisers (either internal or external) should ensure the Fund's operation and management remains fully compliant with all regulations and broader local government requirements, including the Administering Authority's own procedures;
- MHCLG (assisted by the Government Actuary's Department) and the Scheme Advisory Board, should work with LGPS Funds to meet Section 13 requirements.

Appendix C – Key risks and controls

C1 Types of risk

The Administering Authority has an active risk management programme in place. The measures that it has in place to control key risks are summarised below under the following headings:

- financial;
- demographic;
- regulatory; and
- governance.

C2 Financial risks

Risk	Summary of Control Mechanisms
Fund assets fail to deliver returns in line with the anticipated returns underpinning the valuation of liabilities and contribution rates over the long-term.	<p>Only anticipate long-term returns on a relatively prudent basis to reduce risk of under-performing.</p> <p>Assets invested on the basis of specialist advice, in a suitably diversified manner across asset classes, geographies, managers, etc.</p> <p>Analyse progress at three yearly valuations for all employers.</p> <p>Inter-valuation roll-forward of liabilities between valuations at whole Fund level.</p>
Inappropriate long-term investment strategy.	<p>Overall investment strategy options considered as an integral part of the funding strategy. Used asset liability modelling to measure 4 key outcomes.</p> <p>Chosen option considered to provide the best balance.</p>
Active investment manager under-performance relative to benchmark.	<p>Quarterly investment monitoring analyses market performance and active managers relative to their index benchmark.</p>
Pay and price inflation significantly more than anticipated.	<p>The focus of the actuarial valuation process is on real returns on assets, net of price and pay increases.</p> <p>Inter-valuation monitoring, as above, gives early warning.</p> <p>Some investment in bonds also helps to mitigate this risk.</p> <p>Employers pay for their own salary awards and should be mindful of the geared effect on pension liabilities of any bias in pensionable pay rises towards longer-serving employees.</p>

Risk	Summary of Control Mechanisms
Effect of possible increase in employer's contribution rate on service delivery and admission/scheduled bodies	An explicit stabilisation mechanism has been agreed as part of the funding strategy. Other measures are also in place to limit sudden increases in contributions.
Orphaned employers give rise to added costs for the Fund	<p>The Fund seeks a cessation debt (or security/guarantor) to minimise the risk of this happening in the future.</p> <p>If it occurs, the Actuary calculates the added cost spread pro-rata among all employers – (see 3.9).</p>
Effect of possible asset underperformance as a result of climate change	Covered in the Fund's Investment Strategy Statement

C3 Demographic risks

Risk	Summary of Control Mechanisms
Pensioners living longer, thus increasing cost to Fund.	<p>Set mortality assumptions with some allowance for future increases in life expectancy.</p> <p>The Fund Actuary has direct access to the experience of over 50 LGPS funds which allows early identification of changes in life expectancy that might in turn affect the assumptions underpinning the valuation.</p>
Maturing Fund – i.e. proportion of actively contributing employees declines relative to retired employees.	Continue to monitor at each valuation, consider seeking monetary amounts rather than % of pay and consider alternative investment strategies.
Deteriorating patterns of early retirements	<p>Employers are charged the extra cost of non ill-health retirements following each individual decision.</p> <p>Employer ill health retirement experience is monitored, and insurance is an option.</p>
Reductions in payroll causing insufficient deficit recovery payments	<p>In many cases this may not be sufficient cause for concern, and will in effect be caught at the next formal valuation. However, there are protections where there is concern, as follows:</p> <p>Employers in the stabilisation mechanism may be brought out of that mechanism to permit appropriate contribution increases (see Note (b) to 3.3).</p> <p>For other employers, review of contributions is permitted in general between valuations (see Note (f) to 3.3) and may require a move in deficit contributions</p>

Risk	Summary of Control Mechanisms
	from a percentage of payroll to fixed monetary amounts.

C4 Regulatory risks

Risk	Summary of Control Mechanisms
Changes to national pension requirements and/or HMRC rules e.g. changes arising from public sector pensions reform.	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>The Administering Authority is monitoring the progress on the McCloud court case and will consider an interim valuation or other appropriate action once more information is known.</p> <p>The government's long term preferred solution to GMP indexation and equalisation - conversion of GMPs to scheme benefits - was built into the 2019 valuation.</p>
Time, cost and/or reputational risks associated with any MHCLG intervention triggered by the Section 13 analysis (see Section 5).	Take advice from Fund Actuary on position of Fund as at prior valuation, and consideration of proposed valuation approach relative to anticipated Section 13 analysis.
Changes by Government to particular employer participation in LGPS Funds, leading to impacts on funding and/or investment strategies.	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>Take advice from Fund Actuary on impact of changes on the Fund and amend strategy as appropriate.</p>

e) C5 Governance risks

Risk	Summary of Control Mechanisms
Administering Authority unaware of structural changes in an employer's membership (e.g. large fall in employee members, large number of retirements) or not advised of an employer closing to new entrants.	<p>The Administering Authority has a close relationship with employing bodies and communicates required standards e.g. for submission of data.</p> <p>The Actuary may revise the rates and Adjustments certificate to increase an employer's contributions between triennial valuations</p> <p>Deficit contributions may be expressed as monetary amounts.</p>

Risk	Summary of Control Mechanisms
<p>Actuarial or investment advice is not sought, or is not heeded, or proves to be insufficient in some way</p>	<p>The Administering Authority maintains close contact with its specialist advisers.</p> <p>Advice is delivered via formal meetings involving Elected Members, and recorded appropriately.</p> <p>Actuarial advice is subject to professional requirements such as peer review.</p>
<p>Administering Authority failing to commission the Fund Actuary to carry out a termination valuation for a departing Admission Body.</p>	<p>The Administering Authority requires employers with Best Value contractors to inform it of forthcoming changes.</p> <p>Community Admission Bodies' memberships are monitored and, if active membership decreases, steps will be taken.</p>
<p>An employer ceasing to exist with insufficient funding or adequacy of a bond.</p>	<p>The Administering Authority believes that it would normally be too late to address the position if it was left to the time of departure.</p> <p>The risk is mitigated by:</p> <p>Seeking a funding guarantee from another scheme employer, or external body, where-ever possible (see Notes (h) and (j) to 3.3).</p> <p>Alerting the prospective employer to its obligations and encouraging it to take independent actuarial advice.</p> <p>Vetting prospective employers before admission.</p> <p>Where permitted under the regulations requiring a bond to protect the Fund from various risks.</p> <p>Requiring new Community Admission Bodies to have a guarantor.</p> <p>Reviewing bond or guarantor arrangements at regular intervals (see Note (f) to 3.3).</p> <p>Reviewing contributions well ahead of cessation if thought appropriate (see Note (a) to 3.3).</p>
<p>An employer ceasing to exist resulting in an exit credit being payable</p>	<p>The Administering Authority regularly monitors admission bodies coming up to cessation</p> <p>The Administering Authority invests in liquid assets to ensure that exit credits can be paid when required.</p>

Appendix D – The calculation of Employer contributions

In [Section 2](#) there was a broad description of the way in which contribution rates are calculated. This Appendix considers these calculations in much more detail.

As discussed in Section 2, the actuary calculates the required contribution rate for each employer using a three-step process:

- Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See Appendix E for more details of what assumptions we make to determine that funding target;
- Determine the time horizon over which the employer should aim to achieve that funding target. See the table in 3.3 and Note (c) for more details;
- Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See the table in 3.3 Note (e) for more details.

The calculations involve actuarial assumptions about future experience, and these are described in detail in [Appendix E](#).

D1 What is the difference between calculations across the whole Fund and calculations for an individual employer?

Employer contributions are normally made up of two elements:

- a) the estimated cost of ongoing benefits being accrued, referred to as the "Primary contribution rate" (see [D2](#) below); plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "Secondary contribution rate" (see [D3](#) below).

The contribution rate for each employer is measured as above, appropriate for each employer's assets, liabilities and membership. The whole Fund position, including that used in reporting to MHCLG (see section 5), is calculated in effect as the sum of all the individual employer rates. MHCLG currently only regulates at whole Fund level, without monitoring individual employer positions.

D2 How is the Primary contribution rate calculated?

The Primary element of the employer contribution rate is calculated with the aim that these contributions will meet benefit payments in respect of members' **future** service in the Fund. This is based upon the cost (in excess of members' contributions) of the benefits which employee members earn from their service each year.

The Primary rate is calculated separately for all the employers, although employers within a pool will pay the contribution rate applicable to the pool as a whole. The Primary rate is calculated such that it is projected to:

0. meet the required funding target for all future years' accrual of benefits*, excluding any accrued assets,
1. within the determined time horizon (see [note 3.3 Note \(c\)](#) for further details),

2. with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see [3.3 Note \(e\)](#) for further details).

* The projection is for the current active membership where the employer no longer admits new entrants, or additionally allows for new entrants where this is appropriate.

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund's actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in [Appendix E](#). The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

The approach includes expenses of administration to the extent that they are borne by the Fund, and includes allowances for benefits payable on death in service and on ill health retirement.

D3 How is the Secondary contribution rate calculated?

The Secondary rate is calculated as the balance over and above the Primary rate, such that the total contribution rate is projected to:

meet the required funding target relating to combined past and future service benefit accrual, including accrued asset share (see [D5](#) below)

at the end of the determined time horizon (see [3.3 Note \(c\)](#) for further details)

with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see [3.3 Note \(e\)](#) for further details).

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund Actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in [Appendix E](#). The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

D4 What affects a given employer's valuation results?

The results of these calculations for a given individual employer will be affected by:

1. past contributions relative to the cost of accruals of benefits;
2. different liability profiles of employers (e.g. mix of members by age, gender, service vs. salary);
3. the effect of any differences in the funding target, i.e. the valuation basis used to value the employer's liabilities at the end of the time horizon;
4. any different time horizons;
5. the difference between actual and assumed rises in pensionable pay;
6. the difference between actual and assumed increases to pensions in payment and deferred pensions;
7. the difference between actual and assumed retirements on grounds of ill-health from active status;
8. the difference between actual and assumed amounts of pension ceasing on death;

9. the additional costs of any non ill-health retirements relative to any extra payments made; and/or
10. differences in the required likelihood of achieving the funding target.

D5 How is each employer's asset share calculated?

The Administering Authority does not operate separate bank accounts or investment mandates for each employer. Therefore it cannot account for each employer's assets separately. Instead, the Fund Actuary must apportion the assets of the whole Fund between the individual employers. There are broadly two ways to do this:

- 1) A technique known as "analysis of surplus" in which the Fund actuary estimates the surplus/deficit of an employer at the current valuation date by analysing movements in the surplus/deficit from the previous actuarial valuation date. The estimated surplus/deficit is compared to the employer's liability value to calculate the employer's asset value. The actuary will quantify the impact of investment, membership and other experience to analyse the movement in the surplus/deficit. This technique makes a number of simplifying assumptions due to the unavailability of certain items of information. This leads to a balancing, or miscellaneous, item in the analysis of surplus, which is split between employers in proportion to their asset shares.
- 2) A 'cashflow approach' in which an employer's assets are tracked over time allowing for cashflows paid in (contributions, transfers in etc.), cashflows paid out (benefit payments, transfers out etc.) and investment returns on the employer's assets.

Until 31 March 2016 the Administering Authority used the 'analysis of surplus' approach to apportion the Fund's assets between individual employers.

Since then, the Fund has adopted a cashflow approach for tracking individual employer assets.

In particular, with effect from 1 April 2019, the Fund Actuary uses the Hymans Robertson's proprietary "HEAT" system to track employer assets on a monthly basis. Starting with each employer's assets from the previous month end, cashflows paid in/out and investment returns achieved on the Fund's assets over the course of the month are added to calculate an asset value at the month end.

The Fund is satisfied that this new approach provides the most accurate asset allocations between employers that is reasonably possible at present.

D6 How does the Fund adjust employer asset shares when an individual member moves from one employer in the Fund to another?

Under the cashflow approach for tracking employer asset shares, the Fund has allowed for any individual members transferring from one employer in the Fund to another, via the transfer of a sum from the ceding employer's asset share to the receiving employer's asset share. This sum is equal to the member's Cash Equivalent Transfer Value (CETV) as advised by the Fund's administrators.

f)

Appendix E – Actuarial assumptions

E1 What are the actuarial assumptions used to calculate employer contribution rates?

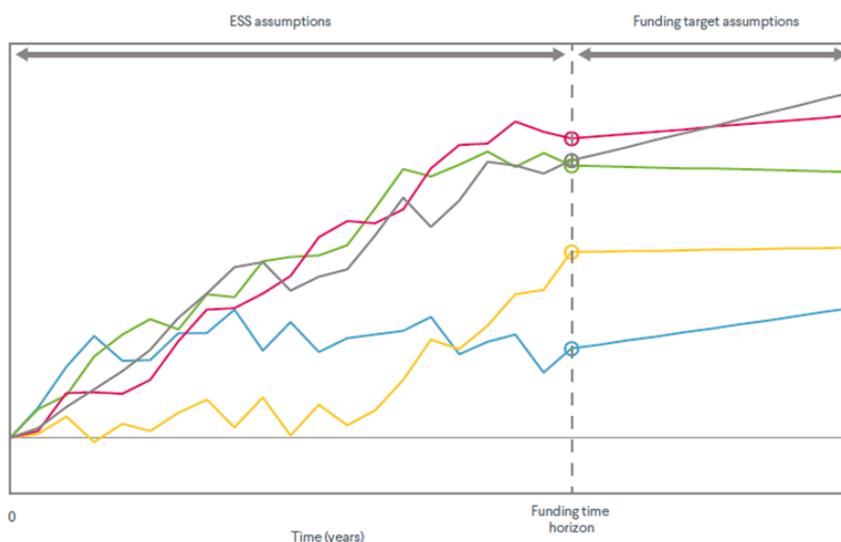
These are expectations of future experience used to place a value on future benefit payments (“the liabilities”) and future asset values. Assumptions are made about the amount of benefit payable to members (the financial assumptions) and the likelihood or timing of payments (the demographic assumptions). For example, financial assumptions include investment returns, salary growth and pension increases; demographic assumptions include life expectancy, probabilities of ill-health early retirement, and proportions of member deaths giving rise to dependants’ benefits.

Changes in assumptions will affect the funding target and required contribution rate. However, different assumptions will not of course affect the actual benefits payable by the Fund in future.

The actuary’s approach to calculating employer contribution rates involves the projection of each employer’s future benefit payments, contributions and investment returns into the future under 5,000 possible economic scenarios. Future inflation (and therefore benefit payments) and investment returns for each asset class (and therefore employer asset values) are variables in the projections. By projecting the evolution of an employer’s assets and benefit payments 5,000 times, a contribution rate can be set that results in a sufficient number of these future projections (determined by the employer’s required likelihood) being successful at the end of the employer’s time horizon. In this context, a successful contribution rate is one which results in the employer having met its funding target at the end of the time horizon.

Setting employer contribution rates therefore requires two types of assumptions to be made about the future:

1. Assumptions to project the employer’s assets, benefits and cashflows to the end of the funding time horizon. For this purpose the actuary uses Hymans Robertson’s proprietary stochastic economic model - the Economic Scenario Service (“ESS”).
2. Assumptions to assess whether, for a given projection, the funding target is satisfied at the end of the time horizon. For this purpose, the Fund has three different funding bases.



Details on the ESS assumptions and funding target assumptions are included below (in E2 and E3 respectively).

E2 What assumptions are used in the ESS?

The actuary uses Hymans Robertson's ESS model to project a range of possible outcomes for the future behaviour of asset returns and economic variables. With this type of modelling, there is no single figure for an assumption about future inflation or investment returns. Instead, there is a range of what future inflation or returns will be which leads to likelihoods of the assumption being higher or lower than a certain value.

The ESS is a complex model to reflect the interactions and correlations between different asset classes and wider economic variables. The table below shows the calibration of the model as at 31 March 2019. All returns are shown net of fees and are the annualised total returns over 5, 10 and 20 years, except for the yields which refer to the simulated yields at that time horizon.

E3 What assumptions are used in the funding target?

At the end of an employer's funding time horizon, an assessment will be made – for each of the 5,000 projections – of how the assets held compare to the value of assets required to meet the future benefit payments (the funding target). Valuing the cost of future benefits requires the actuary to make assumptions about the following financial factors:

- Benefit increases and CARE revaluation
- Salary growth
- Investment returns (the “discount rate”)

Each of the 5,000 projections represents a different prevailing economic environment at the end of the funding time horizon and so a single, fixed value for each assumption is unlikely to be appropriate for every projection. For example, a high assumed future investment return (discount rate) would not be prudent in projections with a weak outlook for economic growth. Therefore, instead of using a fixed value for each assumption, the actuary references economic indicators to ensure the assumptions remain appropriate for the prevailing economic environment in each projection. The economic indicators the actuary uses are: future inflation expectations and the prevailing risk free rate of return (the yield on long term UK government bonds is used as a proxy for this rate).

The Fund has three funding bases which will apply to different employers depending on their type. Each funding basis has a different assumption for future investment returns when determining the employer's funding target.

Funding basis	Ongoing participation basis	Contractor exit basis	Low risk exit basis
Employer type	All employers except Transferee Admission Bodies and closed Community Admission Bodies	Transferee Admission Bodies	Community Admission Bodies that are closed to new entrants
Investment return assumption underlying the employer's funding target (at the end of its time horizon)	Long term government bond yields plus an asset outperformance assumption (AOA) of 1.6% p.a.	Long term government bond yields plus 1.6% (appropriate to the basis used to allocate assets to the employer on joining the Fund)	Long term government bond yields with no allowance for outperformance on the Fund's assets

g)

E4 What other assumptions apply?

The following assumptions are those of the most significance used in both the projection of the assets, benefits and cashflows and in the funding target.

a) Salary growth

After discussion with Fund officers, the salary increase assumption at the 2019 valuation has been set to be a blended rate combined of short term restrictions plus longer term increases linked to price inflation; the agreed blended rate is RPI less 0.7% p.a.. This is the same assumption used at the previous valuation.

b) Pension increases

Since 2011 the consumer prices index (CPI), rather than RPI, has been the basis for increases to public sector pensions in deferment and in payment. Note that the basis of such increases is set by the Government, and is not under the control of the Fund or any employers.

At this valuation, we have continued to assume that CPI is 1.0% per annum lower than RPI. (Note that the reduction is applied in a geometric, not arithmetic, basis).

c) Life expectancy

The demographic assumptions are intended to be best estimates of future experience in the Fund based on past experience of LGPS funds which participate in Club Vita, the longevity analytics service used by the Fund, and endorsed by the actuary.

The longevity assumptions that have been adopted at this valuation are a bespoke set of "VitaCurves", produced by the Club Vita's detailed analysis, which are specifically tailored to fit the membership profile of the Fund. These curves are based on the data provided by the Fund for the purposes of this valuation.

Allowance has been made in the ongoing valuation basis for future improvements in line with the 2018 version of the Continuous Mortality Investigation model published by the Actuarial Profession and a 1.25% per annum minimum underpin to future reductions in mortality rates. This updated allowance for future improvements will generally result in lower life expectancy assumptions and hence a reduced funding target (all other things being equal).

The approach taken is considered reasonable in light of the long term nature of the Fund and the assumed level of security underpinning members' benefits.

d) General

The same financial assumptions are adopted for most employers (on the ongoing participation basis identified above) in deriving the funding target underpinning the Primary and Secondary rates: as described in [\(3.3\)](#), these calculated figures are translated in different ways into employer contributions, depending on the employer's circumstances.

The demographic assumptions, in particular the life expectancy assumption, in effect vary by type of member and so reflect the different membership profiles of employers.

Appendix F – Glossary

Administering Authority	The council with statutory responsibility for running the Fund, in effect the Fund’s “trustees”.
Admission Bodies	Employers where there is an Admission Agreement setting out the employer’s obligations. These can be Community Admission Bodies or Transferee Admission Bodies. For more details (see 2.3).
Covenant	The assessed financial strength of the employer. A strong covenant indicates a greater ability (and willingness) to pay for pension obligations in the long run. A weaker covenant means that it appears that the employer may have difficulties meeting its pension obligations in full over the longer term.
Designating Employer	Employers such as town and parish councils that are able to participate in the LGPS via resolution. These employers can designate which of their employees are eligible to join the Fund.
Employer	An individual participating body in the Fund, which employs (or used to employ) members of the Fund. Normally the assets and funding target values for each employer are individually tracked, together with its Primary rate at each valuation .
Funding basis	The combined set of assumptions made by the actuary, regarding the future, to calculate the value of the funding target at the end of the employer’s time horizon. The main assumptions will relate to the level of future investment returns, salary growth, pension increases and longevity. More prudent assumptions will give a higher funding target, whereas more optimistic assumptions will give a lower funding target.
Gilt	A UK Government bond, ie a promise by the Government to pay interest and capital as per the terms of that particular gilt, in return for an initial payment of capital by the purchaser. Gilts can be “fixed interest”, where the interest payments are level throughout the gilt’s term, or “index-linked” where the interest payments vary each year in line with a specified index (usually RPI). Gilts can be bought as assets by the Fund, but are also used in funding as an objective measure of a risk-free rate of return.
Guarantee / guarantor	A formal promise by a third party (the guarantor) that it will meet any pension obligations not met by a specified employer. The presence of a guarantor will mean, for instance, that the Fund can consider the employer’s covenant to be as strong as its guarantor’s.
Letting employer	An employer which outsources or transfers a part of its services and workforce to another employer (usually a contractor). The contractor will pay towards the LGPS benefits accrued by the transferring members, but ultimately the obligation to pay for these benefits will revert to the letting employer. A letting employer will usually

	be a local authority, but can sometimes be another type of employer such as an Academy.
LGPS	The Local Government Pension Scheme, a public sector pension arrangement put in place via Government Regulations, for workers in local government. These Regulations also dictate eligibility (particularly for Scheduled Bodies), members' contribution rates, benefit calculations and certain governance requirements. The LGPS is divided into 100 Funds which map the UK. Each LGPS Fund is autonomous to the extent not dictated by Regulations, e.g. regarding investment strategy, employer contributions and choice of advisers.
Maturity	A general term to describe a Fund (or an employer's position within a Fund) where the members are closer to retirement (or more of them already retired) and the investment time horizon is shorter. This has implications for investment strategy and, consequently, funding strategy.
Members	The individuals who have built up (and may still be building up) entitlement in the Fund. They are divided into actives (current employee members), deferreds (ex-employees who have not yet retired) and pensioners (ex-employees who have now retired, and dependants of deceased ex-employees).
Primary contribution rate	The employer contribution rate required to pay for ongoing accrual of active members' benefits (including an allowance for administrative expenses). See Appendix D for further details.
Profile	The profile of an employer's membership or liability reflects various measurements of that employer's members , ie current and former employees. This includes: the proportions which are active, deferred or pensioner; the average ages of each category; the varying salary or pension levels; the lengths of service of active members vs their salary levels, etc. A membership (or liability) profile might be measured for its maturity also.
Rates and Adjustments Certificate	A formal document required by the LGPS Regulations, which must be updated at the conclusion of the formal valuation . This is completed by the actuary and confirms the contributions to be paid by each employer (or pool of employers) in the Fund for the period until the next valuation is completed.
Scheduled Bodies	Types of employer explicitly defined in the LGPS Regulations, whose employees must be offered membership of their local LGPS Fund. These include Councils, colleges, universities, academies, police and fire authorities etc, other than employees who have entitlement to a different public sector pension scheme (e.g. teachers, police and fire officers, university lecturers).
Secondary contribution rate	The difference between the employer's actual and Primary contribution rates . See Appendix D for further details.
Stabilisation	Any method used to smooth out changes in employer contributions from one year to the next. This is very broadly required by the LGPS Regulations, but in practice is particularly employed for large stable employers in the Fund.

Valuation

A risk management exercise to review the Primary and Secondary contribution rates, and other statutory information for a Fund, and usually individual employers too.

d. Investment Strategy Statement

Introduction and background

This is the Investment Strategy Statement (“ISS”) of the London Borough of Brent Pension Fund (“the Fund”), which is administered by Brent Council, (“the Administering Authority”). The ISS is made in accordance with Regulation 7 of the Local Government Pension Fund (Management and Investment of Funds) Regulations 2016 (“the Regulations”). The Regulations require administering authorities to prepare, publish, and when appropriate revise, a written statement recording the investment policy of the pension fund; they also stipulate certain key issues which must be covered in the Statement.

The ISS has been prepared by the Pension Fund Sub Committee (“the Committee”) having taken advice from the Fund’s investment adviser, Hymans Robertson LLP. The Committee acts on the delegated authority of the Administering Authority.

The ISS, which was approved by the Committee in October 2020, is subject to periodic review at least every three years and without delay after any significant change in investment policy. The previous review took place in 2019 and was approved by Committee on 27 February 2019. The Committee has consulted on the contents of the Fund’s investment strategy with such persons it considers appropriate.

The Committee seeks to invest in accordance with the ISS, any Fund money that is not needed immediately to make payments from the Fund. The ISS should be read in conjunction with the Fund’s Funding Strategy Statement.

The Fund has chosen to opt up and be classified as a Professional client as defined in the Markets in Financial Instruments Directive.

In December 2019, in line with the Competition and Market Authority’s Order, the Fund agreed a set of objectives with Hymans Robertson LLP. These will be reviewed on, at least, an annual basis.

The suitability of particular investments and types of investments

The Fund’s primary objective is to provide pension and lump sum benefits for members on their retirement and/or benefits on death, before or after retirement, for their dependants, on a defined benefits basis. The funding position will be reviewed at each actuarial valuation, or more frequently as required.

The Committee aims to manage the Fund in such a manner that, in normal market conditions, all accrued benefits are fully covered by the value of the Fund’s assets and that an appropriate level of contributions are agreed by the employers to meet the cost of future benefits accruing.

For employee members, benefits will be based on service completed but will take account of future salary and/or inflation increases.

The Fund has the following funding principles:

- Ensure that sufficient resources are available to meet all benefit as they fall due for payment;
- Recover any shortfall in assets, relative to the value of accrued liabilities, over broadly the future working lifetime of current employees;
- Enable employer contributions to be kept as stable as possible and at reasonable cost
- Maximise the returns from investments within reasonable risk parameters.

The Committee has translated its objectives, taking into account the funding principles outlined above, into a suitable long-term strategic asset allocation benchmark for the Fund. This benchmark is consistent with the Committee's views on the appropriate balance between generating a satisfactory long-term return on investments whilst taking account of market volatility and risk and the nature of the Fund's liabilities.

The investment strategy takes due account of the maturity profile of the Fund (e.g. in terms of the relative proportions of liabilities in respect of pensioners, deferred and active members), together with the level of disclosed surplus or deficit (relative to the funding bases used).

The Committee monitors investment strategy on an ongoing basis, focusing on factors including, but not limited to:

- Suitability given the Fund's level of funding and liability profile.
- The level of expected risk.
- Outlook for asset returns.

The Committee also monitors the Fund's actual allocation on a regular basis to ensure it does not notably deviate significantly from the target allocation (accepting that, given the nature of some of the underlying investments, it may take the Fund time to move to the long-term target allocation). This is covered in more detail later in this Statement.

Providing a framework for all investment decision making to enable delivery of the above key objectives are the Fund's investment beliefs. The Fund's currently held investment beliefs which have been updated during the last review are set out in the Appendix.

Strategic allocation

The Fund's current assets include:

- Equities (UK and overseas)
- Diversified growth
- Government bonds
- Private equity
- Infrastructure
- Property
- Multi asset credit

The Fund is invested in these asset classes either directly or through pooled funds. The Fund may also make use of contracts for differences and other derivatives either directly or in pooled funds investing in these products for the purpose of efficient portfolio management or to hedge specific risks when it is deemed appropriate to do so.

The Regulations require the Fund to set out the maximum percentage relative to the total value of all investments that it will invest in particular investments or classes of investment. The Fund's long-term strategic target investment allocation is set out in Table 1 below and includes the associated maximum percentage limits for each asset class associated with the long-term strategic targets. In line with the regulations, the authority's investment strategy does not permit more than 5% of the total value of all investments of fund money to be invested in entities which are connected with that authority within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007(e).

The Regulations also require the Fund to have regards to the diversification of its investments. The overall strategic benchmark comprises a mix of different assets which provides considerable diversification for the Fund. Table 1 outlines both the long-term target and the interim stage, reflecting the time it takes to fund new mandates. The table also includes the maximum percentage (reflected by the upper limit set for rebalancing) of total Fund value that it will seek to have invested in these assets.

The strategic balance of investment takes account of the risk/return characteristics of each asset class e.g. the potential for higher long term returns from equity is balanced against an expectation of higher levels of short term volatility from this asset class; and by looking at the strategy as a whole and the interaction of the asset classes the Fund holds.

The Committee reviews the nature of Fund investments on a regular basis, with particular reference to suitability and diversification. The Committee seeks and considers written advice from a suitably qualified person in undertaking such a review. If, at any time, investment in a strategy not previously known to the Committee is proposed, appropriate advice is sought and training is provided to help the Committee reach an informed decision.

Table 1: Fund allocation

Asset class	Interim Target allocation %	Long-Term Target allocation %	Upper limit for rebalancing %
UK equities	53	50	65
Overseas equities			
Private Equity	5	0	7.5
Total Growth	58	50	N/A
Diversified Growth Funds	20	5	25
Infrastructure	5	15	20

Property	0	10	15
Private Debt	0	5	10
Total Income	25	35	N/A
Multi-asset credit	5	5	10
Government Bonds	10	10	15
Cash	2	0	5
Total Protection	17	15	N/A
Total	100	100	N/A

The latest investment strategy review took place during February 2020. At this time the Committee agreed the following updates to the long-term strategic allocation:

- A 5% increase in the allocation to equities;
- A new 5% allocation to private debt;
- A decrease of 10% in the allocation to diversified growth funds (DGFs).

At the same time, long term allocations to property and infrastructure were maintained at the same level (10% and 15% respectively). The Committee is aware that private market investments take time to invest in, with money committed but not drawn down immediately. This investment phase can take several years. During this investment period the Fund will retain its exiting target allocation to DGFs which will be monitored and regularly assessed in anticipation of its longer-term reduction in size.

The Fund's actual investment arrangements will deviate from their target over time and therefore regular monitoring takes place to prevent too much deviation from the desired strategic allocation. The rebalancing arrangements in place set out in the final section of this report.

Further details on the Fund's risks, including the approach to mitigating risks, is provided in the following section.

Restrictions on investment

The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 have removed the previous restrictions that applied to the 2009 Regulations. The Fund has agreed a number of its own restrictions as set out in the table below. All other investment restrictions will be negotiated with fund managers or the London CIV, subject to the Fund receiving appropriate investment and/or legal advice.

Table 2: Investment Restrictions

Type of investment	Maximum investment by the Fund % of assets
1. Contributions invested in any single partnership	5%
2. Contributions invested in partnerships	30%
3. Cash deposits	10%
4. Investment with any single manager strategy either directly or via the London CIV (excluding investments in passive index tracking strategies)	15%
5. Total investment in illiquid assets	30%

Managers

The Committee has appointed a number of investment managers all of whom are authorised under the Financial Services and Markets Act 2000 to undertake investment business.

The Committee, after seeking appropriate investment advice, has agreed specific benchmarks with each manager so that, in aggregate, they are consistent with the overall asset allocation for the Fund. The Fund's investment managers will hold a mix of investments which reflects their views relative to their respective benchmarks. Within each major market and asset class, the managers will maintain diversified portfolios through direct investment or pooled vehicles. The managers of the passive funds in which the Fund invests hold a mix of investments within each pooled fund that reflects that of their respective benchmark indices.

Risk Measurement and Management

The Committee is aware that the Fund has a need to take risk (e.g. investing in growth oriented assets) to help it achieve its funding objectives. It has a risk management programme in place that aims to help it identify the risks being taken and put in place processes to manage, measure, monitor and (where possible) mitigate the risks being taken. One of the Committee's overarching beliefs is to only to take as much investment risk as is necessary.

The principal risks affecting the Fund are set out below. We also discuss the Fund's approach to managing these risks and the contingency plans that are in place:

Funding risks

- Financial mismatch – The risk that Fund assets fail to grow in line with the developing cost of meeting the liabilities.
- Changing demographics – The risk that longevity improves and other demographic factors change, increasing the cost of Fund benefits.
- Environmental, social and governance (“ESG”) – The risk that ESG related factors (including climate change) reduce the Fund's ability to generate the long-term returns and/or have implications on the Fund's liabilities.
- Systemic risk – The possibility of an interlinked and simultaneous failure of several asset classes and/or investment managers, possibly compounded by financial ‘contagion’, resulting in an increase in the cost of meeting the Fund's liabilities.

The Committee measures and manages financial mismatch in two ways. As indicated above, the Committee has set a long-term strategic asset allocation benchmark for the Fund. This benchmark was set taking into account asset liability modelling which focused on probability of success and level of downside risk.

The Committee assesses risk relative to the strategic benchmark by monitoring the Fund's asset allocation and investment returns relative to the benchmark. The Committee also assesses risk relative to liabilities by monitoring the delivery of benchmark returns relative to liabilities.

The Committee also seeks to understand the assumptions used in any analysis and modelling so they can be compared to their own views and the level of risks associated with these assumptions to be assessed.

The Fund is a long-term investor and therefore, the Committee seeks to act as a responsible asset owner. Further details of the Fund's approach to managing ESG risks are set out later in this document.

The Committee seeks to mitigate systemic risk through holding a diversified portfolio, but appreciate it is not possible to make specific provision for all possible eventualities that may arise under this heading.

Asset risks

- Concentration – The risk that a significant allocation to any single asset category and its underperformance relative to expectation would result in difficulties in achieving funding objectives.
- Illiquidity – The risk that the Fund cannot meet its immediate liabilities because it has insufficient liquid assets. Also the risk that, due to the illiquid nature of the asset classes, the Fund cannot implement its agreed investment strategy on a timely basis.
- Currency risk – The risk that the currency of the Fund’s assets underperforms relative to Sterling (i.e. the currency of the liabilities).
- Manager underperformance – The failure by the fund managers to achieve the rate of investment return assumed in setting their mandates.

The Committee measure and manage asset risks as follows.

The Fund’s strategic asset allocation benchmark invests in a diversified range of asset classes. The Committee has rebalancing arrangements to ensure, where possible, the Fund’s “actual allocation” does not deviate substantially from its target.

The Fund invests in a range of investment mandates each of which has a defined objective, performance benchmark and manager process which, taken in aggregate, help reduce the Fund’s asset concentration risk.

By investing across a range of assets, including liquid quoted equities and bonds, the Committee has recognised the need for access to liquidity in the short term. The Fund also holds liquid diversifying assets over the period while the agreed exposure to less liquid alternatives are being built up.

The Fund invests in a range of overseas markets which provides a diversified approach to currency markets; the Committee also assess the Fund’s currency risk during their risk analysis.

The Committee has considered the risk of underperformance by any single investment manager and have attempted to reduce this risk by appointing more than one manager and having a large proportion of the Fund’s assets managed on a passive basis. The Committee assess the Fund’s managers’ performance on a regular basis, and will take steps, including potentially replacing one or more of their managers, if underperformance persists. Other factors include, but are not limited to, the Committee believing that the manager is not capable of achieving these performance objectives in the future, and/or the manager’s company status changes or there are significant staff changes to their investment team. The Fund also has regular correspondence with the London CIV regarding their managers and their approach to monitoring and assessing managers.

Other provider risk

- Transition risk - The risk of incurring unexpected costs in relation to the transition of assets among managers. When carrying out significant transitions, the Committee seeks suitable professional advice.
- Custody risk – The risk of losing economic rights to Fund assets, when held in custody or when being traded.
- Credit default – The possibility of default of a counterparty in meeting its obligations.
- Stock-lending – The possibility of default and loss of economic rights to Fund assets.

The Committee monitors and manages risks in these areas through a process of regular scrutiny of its providers, and audit of the operations it conducts for the Fund, or has delegated such monitoring and management of risk to the appointed investment managers as appropriate (e.g. custody risk in relation to pooled funds). The Committee has the power to replace a provider should serious concerns exist. Further details of the Fund's approach to pooling and relationship with the London CIV is provided in the section below.

A separate schedule of risks that the Fund monitors is set out in the Fund's Funding Strategy Statement (Appendix C).

The approach to pooling investments, including the use of collective investment vehicles and shared services

The Fund is a participating scheme in the London Collective Investment Vehicle (CIV). The proposed structure and basis on which the London CIV will operate was set out in the July 2016 submission to government.

Assets to be invested in the pool

The Fund's intention is to invest its assets through the London CIV as and when suitable Pool investment solutions become available. An indicative timetable for investing through the Pool was set out in the July 2016 to government and is reviewed on a regular basis. The key criteria for assessment of Pool solutions will be as follows:

1. The pool enables access to an appropriate solution that is consistent with the beliefs, objectives and benchmark criteria set by the Fund and/or
2. There is a benefit to the Fund in investing in the solution offered by the pool.

At the time of preparing this statement the Fund has already invested the following assets via the London CIV (see table below).

Asset class	Manager
Diversified Growth Fund	Baillie Gifford
Diversified Growth Fund	Ruffer
Multi-asset Credit	CQS
Emerging Markets Equities	JP Morgan
Infrastructure	StepStone

In addition, the Fund has passive equity exposure to LGIM and BlackRock both of which have LGPS specific fee scales in place and have benefits of scale due to being pooled with the managers' other clients' assets. The LCIV consider these passive investments to fall under the pool umbrella.

In time, as set out in the indicative timetable for investing through the pool and in line with one of the Committee's stated beliefs, the intention is for all assets (subject to due diligence) to be transitioned into the London CIV. The exceptions to this are the Fund's passive assets and the Fund's existing investments in closed ended funds (which will run-off over time).

Structure and governance of the London CIV

The July 2016 submission to government of the London CIV pool provided a statement addressing the structure and governance of the pool, the mechanisms by which the Fund can hold the pool to account and the services that will be shared or jointly procured. Over time the structure and governance of the Pool may evolve at which point the Fund will outline such details in the ISS. In the meantime, further information is provided on the London CIV's website (<https://londonciv.org.uk/>)

All participants of the CIV are both shareholders and investors in the London CIV company and the governance structure enables both formal and informal scrutiny.

How social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments

The Committee recognise that ESG factors can influence long term investment performance and the Fund's ability to achieve long term sustainable returns. The Committee commits to an ongoing development of its ESG policy to ensure it reflects not only their own (as well as members) evolving beliefs but also the latest industry developments and regulations. In doing so the Committee will seek to ensure ESG is integrated into all strategic considerations.

The Committee consider the Fund's approach to responsible investment in two key areas:

- **Sustainable investment / ESG factors** – considering the financial impact of environmental, social and governance (ESG) factors (including climate change) on its investments.
- **Stewardship and governance** – acting as responsible and active investors/owners, through considered voting of shares, and engaging with investee company management as part of the investment process.

In light of the latest investment strategy review and the Fund's increased focus and importance of responsible investment, the Fund has bolstered its beliefs in this area, specifically:

- *Ongoing engagement is preferable to divestment*
- *We must act as responsible owners*
- *The Fund's investment managers should embed the consideration of ESG factors into their investment process and decision-making*

More detail on these beliefs can be found in the appendix.

The Committee takes ESG matters very seriously. Its investment beliefs include explicit statements relating to ESG and climate change. The ESG criteria of its existing investment investments are assessed on an ongoing basis and ESG is a key consideration when assessing the relative merits of any potential new Fund investments. The Fund also conducts an annual review of its:

- Policies in this area,
- Investment managers' approach to responsible investing; and
- Members' training needs and implements training to reflect these needs.

At the present time the Committee does not take into account non-financial factors when selecting, retaining, or realising its investments. The Committee understand the Fund is not able to exclude investments in order to pursue boycotts, divestment and sanctions against foreign nations and UK defence industries.

The London CIV itself is committed to responsible investment and duly recognises the role of ESG factors in the investment decision making process, evidenced by its own 'responsible investment policy'. The Fund is supportive of this and will monitor the policy on a regular basis as more assets transfer into the pool to ensure consistency with its own beliefs. Details of the investment managers' governance principles can be found on their websites.

The exercise of rights (including voting rights) attaching to investments

Voting rights

The Committee wishes to be an active shareholder and exercise its voting rights to promote and support good corporate governance principles, which in turn will feed through into good performance.

In practice, the Committee has delegated the exercise of voting rights to the investment manager(s) on the basis that voting power will be exercised by them with the objective of preserving and enhancing long term shareholder value. Accordingly, the Fund's managers have produced written guidelines of their process and practice in this regard. The managers are strongly encouraged to vote in line with their guidelines in respect of all resolutions at annual and extraordinary general meetings of companies under Regulation 7(2)(f). The Committee monitor the voting decisions made by all its investment managers on at least an annual basis.

Stewardship

The Committee has formally agreed to adhere to the Stewardship Code as published by the Financial Reporting Council. The Committee expects both the London CIV and any directly appointed fund managers to also comply with the Stewardship Code and this is monitored on an annual basis. The Governance and Compliance Statement can be found within the Fund's Annual Report.

The Committee is willing to consider potential investor collaboration opportunities if such opportunities offer the scope to improve engagement with companies and help increase the potential for long-term sustainable returns to be achieved. In the spirit of collective engagement, the Fund became a member of the Local Authority Pension Fund Forum (LAPFF) in 2020, through which it collectively exercises a voice across a range of corporate governance issues.

Appendix – Investment Beliefs

Clear and well defined objectives are essential to achieve future success - the Committee is aware that there is a need to generate a sufficient level of return from the Fund's assets, while at the same time having a clear understanding of the potential risks and ensuring there is sufficient liquidity available to pay members' benefits as they fall due.

Strategic asset allocation is a key determinant of risk and return, and thus is typically more important than manager or stock selection - the Committee understands that having the appropriate strategy in place is a key driver of the Fund's future success. As a result, priority is given to more strategic investment matters. The Committee is aware that there is need to take investment risk in order to generate a sufficient level of return.

Return and risk should be considered relative to the Fund's liabilities, funding position and contribution strategy – the Committee believes that as the funding position of the Fund improves, the level of risk taken by the Fund should reduce as appropriate i.e. only take as much risk as necessary. The Committee believes that there exists a relationship between the level of investment risk taken and the rate of expected investment return. In reducing risk, the Fund's expected return would typically also reduce.

Long term investing provides opportunities for enhancing returns - As a long-term investor it is important that the Fund acts as an asset owner. As a long term investor, the Fund may choose to gain additional compensation by investing in assets that are illiquid or may be subject to higher levels of volatility (a premium return is required for any such investments).

Environmental, social and corporate governance ('ESG') issues can have a material impact on the long term performance of its investments - the Committee recognises that ESG issues can impact the Fund's returns. The Committee commits to an ongoing development of its ESG policy to ensure it reflects latest industry developments and regulations and ESG is integrated into strategic considerations.

Climate change and the expected transition to a low carbon economy is a long term financial risk to Fund outcomes - the Committee recognises that environmental issues can impact the Fund's returns. The Committee aims to be aware of, and monitor, financially material environmental-related risks and issues through the Fund's investment managers and advisors.

Ongoing engagement is preferable to divestment – The Committee believes that, in relation to ESG risks, ongoing engagement with investee companies is preferable to divestment. This engagement may be via our managers or alongside other investors (e.g. LAPFF). Where, over a considered period however, there is no evidence of a company making visible progress towards carbon reduction, we believe that divestment should be actively considered.

We must act as responsible owners – As asset owners in the 21st Century, we believe it is our responsibility to support the transition to a low carbon global economy, consistent with the aims of the Paris 2016 Climate Change agreement to limit temperature increases by 2050 to a maximum of 2°C degrees.

The Fund's investment managers should embed the consideration of ESG factors into their investment process and decision-making – Investment managers are responsible

for implementing the Fund's strategy. In this role, the managers should reflect the Fund's desire for achieving long-term sustainable returns and improve corporate behaviour.

Equities are expected to generate superior long term returns - the Committee believes that, over the longer term, equities are expected to outperform other liquid assets, in particular government bonds. However the Committee also recognise that equities can be highly volatile over the short-term.

Diversification reduces the overall volatility of the Fund's asset returns - the Committee believes that diversification across asset classes can help reduce the volatility of the Fund's overall asset value and improve its risk-return characteristics. However, the Committee also recognise that there is scope to over diversify and that any desire to diversify needs to be aligned to the Fund's governance arrangements.

Passive management has a role to play in the Fund's structure - The Committee recognises that passive management allows the Fund to access certain asset classes (e.g. equities) on a low cost basis and when combined with active management can help reduce the relative volatility of the Fund's performance. There is a belief that passive management is most suitable for markets that are deemed as being more efficient such as developed market equities.

Active management can add value but is not guaranteed - the Committee recognises that certain asset classes can only be accessed via active management. The Committee also recognises that active managers may be able to generate higher returns for the Fund (net of fees), or similar returns but at lower volatility, than equivalent passive exposure. There is a belief that active management is most suitable for markets that are deemed as being less efficient e.g. emerging market equities, specialist markets e.g. infrastructure or where views on the relative value of different asset classes are a targeted source of value e.g. DGF mandates.

Private markets can offer opportunities - Private markets can offer opportunities and give higher return due to higher illiquidity premia. However it is recognised that private markets can be more expensive, less transparent (e.g. fees and drivers of return), increase the Fund's governance burden and require ongoing maintenance to achieve target exposure. Such factors must be taken into account when considering such an allocation.

Choice of benchmark index matters - the Committee recognises that, for each asset class, there is a range of benchmark indices that they could use. As a result, the Committee focus on the benchmark's underlying characteristics and consider how they may be appropriate for the Fund.

Rebalancing policies are important – the Committee recognises that rebalancing the Fund's assets towards the strategic asset allocation is important in achieving the Fund's longer term objectives, in particular following a period of strong or weak market performance.

Fees and transaction costs matter - The Committee considers the fees and costs of its investment arrangements to ensure the Fund is getting value for money and to minimise, as far as possible, any cost leakages from its investment process. It also does not seek to move in and out of investments regularly due to the cost drag. The Committee also seek to have transparency on the fees that it is paying to its providers.

Governance “budget” matters – The Committee recognises that the resources (and time) involved in deciding upon (and implementing) an investment strategy and structure play a part in any investment decisions made. A low governance approach to accessing markets is likely to be preferred if it can offer similar risk adjusted returns to alternative approaches.

The London CIV is the Fund’s preferred approach to implementation – the Committee recognises the potential benefits of LGPS pooling. Their preferred route is to implement their investment strategy via the London CIV, subject to carrying out suitable due diligence on the CIV’s investment offering.

e. Communications Policy Statement

Introduction

An effective communications strategy is vital for any organisation which strives to provide a high quality and consistent service to their stakeholders.

The Communications Strategy is required by the provisions of Regulation 61 of the Local Government Pension Scheme Regulation 2013. The provision requires the Administering Authority to:

- (1) Prepare, Maintain and publish a written statement setting out its policy concerning communications with:
 - (A) Members
 - (B) Representatives of members
 - (C) Prospective members
 - (D) Scheme employers

- (2) In particular the statement must set out its policy on:
 - (A) the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers
 - (B) the format, frequency and method of distributing such information or publicity;
and
 - (C) the promotion of the Scheme to prospective members and their employers

The Fund aims to use the most appropriate communications medium for the audiences receiving the information. This may involve using more than one method of communication.

Pension Fund Administration

From October 2018, the London Borough of Brent delegated the pension administration service to Lancashire County Council (LCC) who have engaged the Local Pensions Partnership (LPP) to undertake their pensions portfolio. LPP was formed in 2016 through a collaboration between LCC and the London Pensions Fund Authority (LPFA) and provides pension services to the Local Government Pension Scheme, police, firefighters and other public sector funds.

Communication Responsibilities and Resources

The provision of timely, relevant information in a suitable format is key to ensuring efficient and effective communications. It is important that we consider the costs in terms of resource and staff time for all communications and work with the LPP to ensure there are appropriate systems and processes in place to facilitate these communications with our stakeholders.

Communications with Scheme Members

Our aims for communicating with our scheme members are:

- To better educate members of the benefits of the scheme to reduce the general queries being directed to the LPP administration team
- To encourage the use of the pension scheme website and registration to My Pension Online - Member Self Service.

The Key actions will be:

- continual review of employee communication methods to ensure they are effective and efficient
- on-going promotion of the Brent Pension Scheme website and Member Self Service
- Working with LPP to ensure communications are relevant and timely

Action	Audience	Media	End of Year Review 2020
Review and update the pension website https://www.yourpension.org.uk/Brent/Home.aspx	All	Web	
Promote the use of the pension website https://www.yourpension.org.uk/Brent/Home.aspx	All	Web	
Promote My Pension Online – Member Self Service	Active and Deferred	Web	
Explore the development of My Pensions Online – Member Self Service for pensioner members	Pensioner	Web	
Ensure relevant, accurate and timely communications are sent to all members	All	Paper or electronic	

The pension scheme will provide the following communications as required, in addition to day to day individual communications with members.

Communication	Media	Frequency of Issue	Distribution	Audience
https://www.yourpension.org.uk/Brent/Home.aspx Pension Website	Web	Continually available. Updated as required	Advertised on all communications	All
Scheme booklet	Web	Continually available. Updated as required	For viewing as required	All
Newsletters and scheme updates	Web or paper	As required	For viewing as required. Post to home address for targeted communication	All
Forms	Web or paper	As required	Available to download or post to home address	All
Annual Benefit Statements	Web or paper if opted out of online statements	Annually	For viewing as required. Members are informed of availability via personal email, email to employers or internal Global News	Active and Deferred
Road shows/ Workshops	Face to face	When required	Advertised via email, Global News, Posters and employers	Active
Pensioner payslips	Paper	1 st pension payment and every April and May. Payslip sent if a variation in £3 or more	Post to home address	Pensioner
Notice of Pensions Increase	Paper / Electronic	Annually in April	Post to home address for those who opted out of e-communication and upload to http://www.yourpension.org.uk/Brent/Home.aspx	Pensioner

Internal Disputes Resolution Procedure	Paper or Web	Continually available. Updated as required	Post to home address or available to download	All
Annual Report and Accounts	Web	Continually available. Replaced annually	For viewing as required.	All

Explanation of communications

Pension Website - The website will provide scheme specific information, forms, documents (such as newsletters and report and accounts), factsheets, links to related sites including My Pension Online Member Self Service and contact information. We continue to review and develop this site in partnership with LPP.

Scheme booklet - A booklet providing detailed overview of the LGPS, including who can join, how much it costs, the retirement and death benefits and how to purchase additional pension.

Newsletters - Newsletters are issued as required, usually when a significant change to the scheme occurs. Pensions Increase newsletters are sent annually to advise pensioner members of the increase to their pension.

Forms – Many of the required LGPS forms are available on the pension website such as opt out form, 50:50 or Main Scheme election form and expression of wish form.

Annual Benefit Statements – For active members these include the current value of benefits as well as the projected benefits to their normal retirement date. The associated death benefits are shown along with details of any individuals the member has nominated to receive the lump sum death grant. For deferred members these show the current value of the pension benefits, associated death benefits and details of any individuals the member has nominated to receive the lump sum death grant. These released at the end of August and are available on My Pension Online – Member Self Service. Members can opt out of the online service and elect to receive a paper copy sent to their home address.

Pensioner payslips – The payslips are sent when a member receives their first pension payment. They are posted to the pensioner’s home address.

Internal Disputes Resolution Procedure – A formal notification of the procedure to follow in the event that a dispute cannot be resolved by the LPP pension administration team or the Brent Pensions Projects or Contracts Manager

Annual Report and Accounts – Detailed document providing information regarding the value of the Pension Fund during the financial year, income, expenditure and other scheme based information such as the number of scheme members and scheme employers. This is published and available on the Brent Pensions website.

Communications with Prospective Scheme Members

Our aims for communicating with our prospective scheme members are:

- to increase the take up of the LGPS
- to better educate members of the benefits of the scheme to reduce the general queries being directed to the LPP administration team

The Key actions will be:

- review of communication methods to ensure they are effective and efficient
- ensuring automatic enrolment and re-enrolment is well communicated

Action	Audience	Media	End of Year Review 2020
Ensure pension forms are included in starter packs	New employees	Electronic	
Review and update the pension website	All	Web	
Work with employer to ensure automatic enrolment is correctly communicated	Existing employee	Paper or electronic	

The pension scheme will work with employers to provide the following communication as required.

Communication	Media	Frequency of Issue	Distribution	Audience
Pensions Joiner Option Form	Paper	On commencing employment	Via employers	New employees
https://www.yourpension.org.uk/Brent/Home.aspx Pension Website	Web	Continually available. Updated as required	Advertised on all communications	All
Scheme booklet	Web	Continually available. Updated as required	For viewing as required	All
Annual Report and Accounts	Web	Continually available. Replaced annually	For viewing as required.	All

Explanation of communications

Pensions Joiner Option Form – Form provided to all new employees which provides the details of the pension scheme website and allows them to advise of any previous pension entitlements.

Pension Website - The website will provide scheme specific information, forms, documents (such as newsletters and report and accounts), factsheets, links to related sites including My Pension Online Member Self Service and contact information. We continue to review and develop this site in partnership with LPP.

Scheme booklet - A booklet providing detailed overview of the LGPS, including who can join, how much it costs, the retirement and death benefits and how to purchase additional pension.

Annual Report and Accounts – Detailed document providing information regarding the value of the Pension Fund during the financial year, income, expenditure and other scheme based information such as the number of scheme members and scheme employers. This is published and available on the pensions website.

Communications with Scheme Employers

Our aims for communicating with our scheme employers are:

- to improve relationships
- to assist them in understanding their role as a scheme employer
- to assist them in understanding their funding/cost requirements
- to work together to achieve accurate scheme actuary data submissions
- to ensure smooth staff transfers

The Key actions will be:

- offer induction meetings for all new scheme employers
- assist with the implementation of Your Fund, the LPP's online submission portal
- on-going promotion of the employer section of the Brent pension website
- working with relevant parties to admit new employers to the fund

Action	Audience	Media	End of Year Review 2020
Maximise the use of the newly developed ERM employer communication database on Altair	Employers	System	
Meet with all new scheme employers to discuss responsibilities and requirements	Employers	Face to face	
Review and update the pension website	Employer	Web	
Work with LPP and Scheme employers to implement Your Fund.	Employer	Web	
Work with LPP and Scheme employers to ensure accurate and timely data submissions	Employer	Email, phone calls or face to face	

The pension scheme will provide the following communication to employers as required.

Communication	Media	Frequency of Issue	Distribution	Audience
Contact sheet	electronic	Annually	By email	All
Induction meeting	Face to Face	On becoming a scheme employer	By email	New scheme employers
Pension Website https://www.yourpension.org.uk/Brent/Home.aspx	Web	Continually available. Updated as required	Advertised on all communications	All
Tupe Manual and Admissions Policy	Web	Continually available. Updated as required	For viewing as required	Scheme employers and potential admitted bodies

Annual Report and Accounts	Web	Continually available. Replaced annually	For viewing as required.	All
Pension Fund Valuation reports	Electronic	Every three years	Via email	All
Funding Strategy Statement	Web	Continually available. Replaced every three years and updated as required	For viewing as required.	All

Explanation of communications

Contact sheet – A form distributed annually to all scheme employers to ensure contact details are kept up to date. Details are recorded on the ERM system on Altair

Induction Meeting – A meeting offered to all new academies and admitted bodies to discuss roles and responsibilities. An information leaflet is being updated to accompany the meeting and will be made available on the pension website once completed

Pension Website - The website will provide scheme specific information, forms, documents (such as newsletters and report and accounts), factsheets, links to related sites including My Pension Online Member Self Service and contact information. We continue to review and develop this site in partnership with LPP

Tupe Manual and Admissions Policy – These documents are relevant to Letting Authorities that are looking to outsource a service to a third party supplier

Annual Report and Accounts – Detailed document providing information regarding the value of the Pension Fund during the financial year, income, expenditure and other scheme based information such as the number of scheme members and scheme employers. This is published and available on the pensions website

Pension Fund Valuation Reports – A report issued every three years setting out estimates assets and liabilities of the Fund as a whole and setting individual employer contribution rates for the next three year period

Funding Strategy Statement – A summary of the Fund's approach to funding its liabilities, including reference to the Fund's other policies although it is not an exhaustive statement of policy on all issues.

Communications with Representatives of Members

Pensions Committee

Our aims for communicating with Pensions Committee are:

- To provide information to enable the Committee to make decisions delegated under the Council's constitution
- To provide information to ensure the Committee are kept informed of pension related matters
- To ensure the Committee are aware of their responsibilities in relation to the Scheme

The Key actions will be:

- to submit Committee reports, which have been reviewed by the relevant Council business partners and senior manager
- To arrange training sessions when required

Action	Audience	Media	End of Year Review 2020
To submit Committee reports in line with the annual plan and as and when required	Pensions Committee Members	Paper and web	
To arrange required training as and when required	Pensions Committee Members	Face to Face	

The pension scheme will provide the following communication to Pensions Committee Members as required.

Communication	Media	Frequency of Issue	Distribution	Audience
Pensions Committee Reports	Paper and Web	Quarterly and as and when required	By email and available on the Brent.Gov.uk website	Pension Committee Members and Trade Union representatives

Pensions Committee Briefings	Face to face	Quarterly and as and when required		Pensions Committee Members and Trade Union representatives
Training sessions	Face to face	When there is a new Pensions Committee and as and when required	By email	Pensions Committee Members and Trade Union representatives

Explanation of communications

Pensions Committee Reports – Formal reports written by Pension Fund officers and reviewed by Business Partners and a Senior Leadership Team member. Published on the Brent.gov.uk website

Pension Committee Briefings – Pension Fund officers attend each Committee meeting and provide a verbal briefing on each Committee report

Training sessions – Provided by Pension Fund officers, advisors or external experts on investment or administration related matters. Training is shared with the Local Pension Board members where applicable

Pensions Board

Our aims for communicating with the Local Pensions Board are:

- To provide information to enable the board to assist the Scheme Manager in executing their duties
- To provide information to ensure the board are kept informed of pension related matters
- To provide training with regards to investment and administration matters

The Key actions will be:

- To submit reports on areas identified for review by the Board.
- To arrange training sessions with Fund officers, advisors and external experts when required

Action	Audience	Media	End of Year Review 2020
To submit reports in line with the Board work plan and any additional areas identified at meetings	Local Pension Board	Paper and web	
To arrange required training as and when required	Local Pension Board	Face to Face and online	

The pension scheme will provide the following communication to the Pension Board as required.

Communication	Media	Frequency of Issue	Distribution	Audience
Pension Board Reports	Paper and Web	Quarterly and as and when required	By email and available on the Brent.Gov.uk and yourpension.org.uk websites	Local Pension Board
Local Pension Board Briefings	Face to face	Quarterly and as and when required	Fund officers attend each meeting	Local Pension Board
Training sessions	Face to face and online	Before each board meeting. Continual self- development is also required	Face to face delivered by Fund officers and targeted online training	Local Pension Board

Explanation of communications

Pension Board reports – Written by Pension Fund officers to provide a formal update to a particular area of work

Pension Board briefings – Pension Fund officers attend each Board meeting to provide a verbal overview of written reports and to provide updates on any on-going work

Training sessions – Provided by Pension Fund officers, advisors or external experts on investment or administration related matters. Targeted training is also available for Local Pension Board members online via the Pensions Regulator website. Training is shared with the Pensions Committee members where applicable

Other Stakeholders

Pension Fund Manager (Finance)

The Pension Fund Manager (Finance) responds to staff, employer and other enquiries. Skills and knowledge are kept up to date through participation in seminars and conferences.

Local Pensions Partnership

The scheme manager is responsible for monitoring the administration contract with the Local Pensions Partnership. Monthly client reviews take place to monitor the contract and check the service level agreements are being met. They are also responsible for maintaining relationships with scheme employers, trade unions and other relevant stakeholders.

Investment Fund Managers

Day to day contact between the Pension Fund Manager (Finance) and the investment fund managers is maintained. Each fund manager is required to present their performance reports to the Pensions Committee on a cyclical basis, unless performance concerns override this.

Trade Unions

Trade unions in the London Borough of Brent are valuable ambassadors for the Pension Scheme. They ensure that details of the Local Government Pension Scheme's availability are brought to their members' attention and assist in negotiations under TUPE transfers in order to ensure, whenever possible, continued access to the Scheme.

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank