Hackney

REPORT OF THE GROUP DIRECTOR, FINANCE & CORPORATE RESOURCES		
Quarterly Update Report **Pensions Committee** **10 March 2022**	**Classification** **Public** **Ward(s) affected** **ALL**	**Enclosures** **Three** **9**

1. INTRODUCTION

1.1 This report is an update on key quarterly performance measures, including an update on the funding position, investment performance, responsible investment, administration performance and reporting of breaches. It provides the Committee with information on the position of the Fund between November and December 2021. The report also provides an update on the implementation of the investment strategy approved at previous meetings.

2. RECOMMENDATIONS

2.1 The Pensions Committee is recommended to note the report.

3. RELATED DECISIONS

- Pensions Committee (Urgency Delegation March 2020) – 2019 Final Valuation Report and Funding Strategy Statement
- Pensions Committee 23rd November 2021 –Investment Strategy Statement
- Pensions Committee January 2022 –Pension Administration Strategy (PAS)

4. COMMENTS OF THE GROUP DIRECTOR OF FINANCE & CORPORATE RESOURCES

4.1 The Pensions Committee has delegated responsibility for management of the Pension Fund. Quarterly monitoring of key aspects of the management of the Pension Fund is good practice and assists the Committee in making informed decisions.

4.2 Monitoring the performance of the Fund's investment managers is essential to ensure that managers are achieving performance against set benchmarks and targets. Performance of the Fund's assets will continue to have a significant influence on the valuation of the scheme's assets going forward. The investment performance of the Fund is a key factor in the actuarial valuation process and therefore directly impacts on the contributions that the Council is required to make into the Pension Scheme.

4.3 Reporting on administration is included within the quarterly update for the Committee as best practice. Monitoring of key administration targets and ensuring that the administration functions are carried out effectively will help to minimise costs and ensure that the Fund is achieving value for money.

4.4 Whilst there are no direct impacts from the information contained in this report, quarterly monitoring of key aspects of the Pension Fund helps to provide assurance to the Committee of the overall financial performance of the Fund and enables the Committee to make informed decisions about the management of the Fund.

5. COMMENTS OF THE DIRECTOR OF LEGAL AND GOVERNANCE

5.1 The Pensions Committee's Terms of References sets out its responsibility for management of the Pension Fund. The Committee has delegated responsibility:

- To make arrangements for the triennial actuarial valuation, monitor liabilities and to undertake any asset/liability and other relevant studies as required.
- To monitor the performance and effectiveness of the investment managers and their compliance with the Statement of Investment Principles (Investment Strategy Statement).
- To set an annual budget for the operation of the Pension Fund and to monitor income and expenditure against budget.
- To act as Scheme Manager for the Pension Fund

5.2 Given these responsibilities, it is appropriate for the Committee to consider a regular quarterly update covering funding and investment matters, budget monitoring and scheme administration and governance.

6. FUNDING UPDATE

6.1 An update on the funding level of the Fund as at 31 December will be provided at the meeting pending completion of associated analysis required at the time of writing this report.

7. INVESTMENT UPDATE

7.1 Appendix 1 to this report provides a manager performance update from the Fund's Investment consultants, Hymans Robertson. The report includes an analysis of the last quarter, 1 year and 3 year performance against benchmark and target, as well as Hymans Robertson's current ratings for each manager. The report shows that the Fund produced positive absolute returns over the quarter of 4.2%, slightly underperforming its benchmark. As set out in the January Quarterly Update Report to the Committee, the Fund fully disinvested from the Invesco Diversified Growth Fund and reinvested this in the LCIV Diversified Growth Fund, as per the agreed investment strategy. The LCIV Renewable Infrastructure Fund also began to drawdown from the Fund's commitment. Over the last 12 months, the Fund outperformed the benchmark by 1%, producing overall returns of 12.9%. Over the last 3 years, returns of 12.2% were achieved out-performimg benchmark by 1.2%.

8. INVESTMENT STRATEGY IMPLEMENTATION UPDATE

8.1 Following the Committee's approval of its refreshed investment strategy, Officers agreed to provide a quarterly update on its actual implementation.

8.2 In January's update report it was reported that the following had been achieved:

- Due diligence has been completed on the LCIV private debt and renewable infrastructure funds and suitability notes issued by our investment advisers.
- Subscription documentation has been completed for the LCIV private debt and renewable infrastructure funds and initial capital calls have now been made and funded.
- Due diligence has also been completed on the LCIV Paris Aligned Global Alpha Fund, Emerging Market Equity Fund and Diversified Growth Fund with suitability notes to be issued shortly (now received).
- Liaison with Hymans and LCIV regarding approved transitions into Paris Aligned Global Alpha Fund, Emerging Market Equity Fund and the Diversified Growth Funds, along with the receipt of transition advice in order to ensure they are undertaken is the most cost effective manner.
- The BlackRock UK Equity Fund mandate had been fully redeemed along with part redemption of the BlackRock World Equity Fund mandates in order to transition funds to the LCIV Paris Aligned Global Alpha Fund. In addition, the RBC Emerging Market mandate was fully redeemed in order to finance transition over to the LCIV Emerging Market Fund.

8.3 The transition from GMO Diversified Growth Fund (DGF) mandate to the LCIV DGF mandate, along with the full redemption of the Invesco DGF mandate took place during the last quarter.

9. RESPONSIBLE INVESTMENT UPDATE

9.1 The Pensions Committee has looked to increase the level of engagement with the underlying companies in which it invests. This includes taking a more proactive role in encouraging managers to take into consideration the voting recommendations of the Local Authority Pension Fund Forum (LAPFF). This section of the quarterly report therefore provides the Committee with an update on the work of the LAPFF. In addition the update will include key topical issues concerning environmental and social governance issues in order to provide scope for discussion on these key issues.

9.2 The LAPFF Quarterly Engagement report is attached at Appendix 2 to this report, setting out LAPFF's engagement activity over the Quarter in relation to environmental, social and governance issues. As the Committee will recognise, the Fund no longer retains any segregated mandates and therefore has no direct holdings in the companies referenced. It does, however, retain exposure via its pooled passive funds to a large number of the companies LAPFF engages with.

9.3 As can be seen from the LAPFF Quarterly Update Report, much of the engagement with companies has continued to focus on human rights, social and climate change issues. LAPFF continue to issue voting alerts in respect of both climate change issues and wider social/human rights issues.

9.4 Officers have continued to work with advisors in the development of the RI work and in particular have produced a more detailed workplan in respect of the related work required during 2022 in respect of both the Fund's carbon targets and wider RI policies. A separate paper is included on the agenda for this meeting in respect of the recommended RI Policy and refreshed climate change targets. In addition, Trucost have completed the analysis of the Fund's current position against the carbon reduction target and the results of thai are reported to Committee elsewhere on the agenda.

10. PENSION ADMINISTRATION

10.1 Pension Administration Management Performance

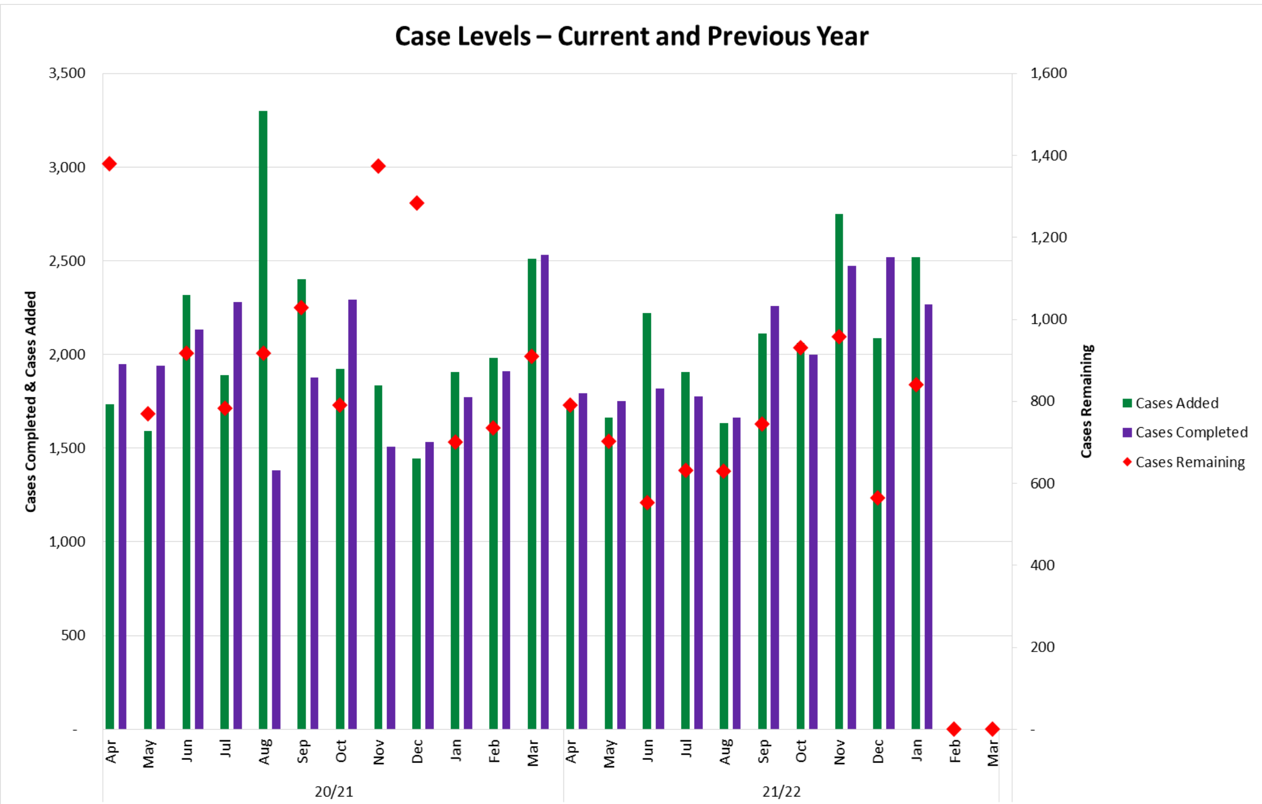
The following sections provide information on the numbers of cases being received and processed by Equiniti, as well as their performance against the Fund's service level agreement standards (SLAs).

Case Levels

The graphs below show historical cases levels received and processed by Equiniti dating back to April 2019. For each month, the graph shows:

- "cases added" - the number cases received by Equiniti during the month ("cases added") and
- "cases completed" - the number of cases completed by Equiniti during the month ("cases completed")
- "cases remaining" - the numbers of cases that are outstanding and therefore waiting to be processed by Equiniti at the end of each month ("cases remaining")

For December 2021 to January 2022, the number of cases received has decreased from November but the number of cases completed by Equiniti has stayed at a high level after the substantial increase that occurred in the previous quarter. The impact of this is that the cases still to be processed ("cases remaining") are lower than the previous quarter.



SLA and KPI monitoring

The contract with Equiniti includes a large number of service level agreement standards (SLAs). The most significant of these for the Fund are categorised as being key performance indicators (KPIs) and these are monitored closely. The KPIs include target timescales for processes such as:

- providing new members with information about the scheme
- notifying retiring members of the amount of retirement benefits and paying them their tax free cash lump sum
- informing members who leave the scheme before retirement of their deferred benefit entitlement.

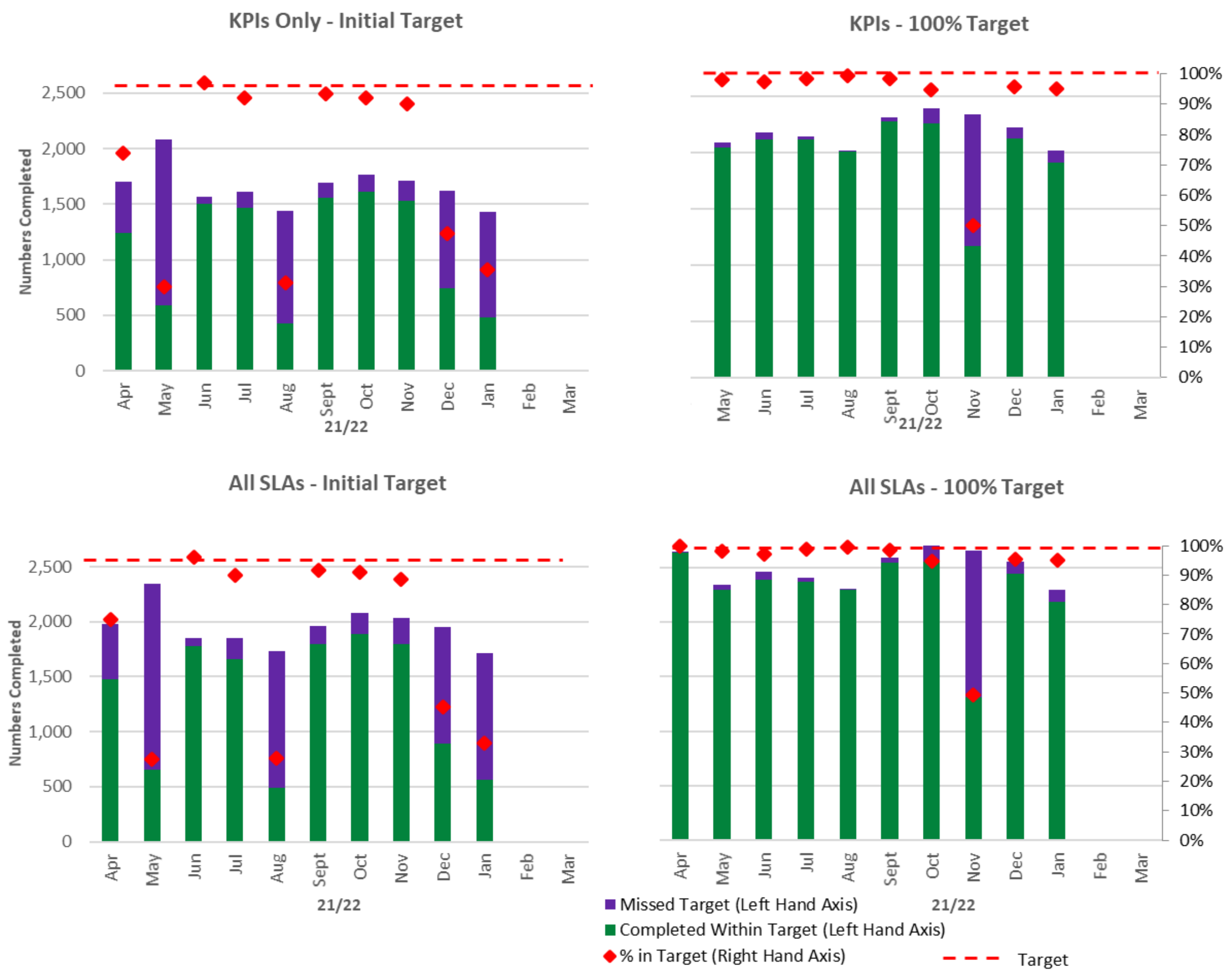
For most SLAs there are two targets:

- an initial target – this is the initial timescale within which the majority of cases must be processed (typically 95% is the target to be processed by the initial target period)
- the 100% target – this is a later timescale by which it is expected that 100% of cases will be processed by.

The following graphs show Equiniti's performance against the various targets since April 2021. Each graph illustrates the numbers of cases completed within the target (green) and the number outstanding (purple), as well as the percentage of cases completed within the target (red diamond which relates to the right hand axis). The four graphs are as follows:

- KPIs Only – Initial Target: this shows the performance against **only** the key performance indicators based on the initial target where it is expected that (in the main) 95% of cases will be processed.
- KPIs Only – 100% Target: this shows the performance against **only** the key performance indicators based on the 100% target where it is expected that all cases will be processed.
- All SLAs – Initial Target: this shows the performance against **all** service level agreement standards based on the initial target where it is expected that (in the main) 95% of cases will be processed.
- All SLAs – 100% Target: this shows the performance against **all** service level agreement standards based on the 100% target where it is expected that all cases will be processed.

For the period December 2021 to January 2022, Equiniti have performed very close to 100% target in all measures but there has been a decrease in the number of cases completed within the initial KPI target. A key element of this may be due to Equiniti focussing on tacking historic cases caused by the significant increases in cases that were received during the previous quarter (as illustrated in the graphs above).



10.2 New Starters and Opt-Outs

	Total Active Membership at end of Quarter	Total Opt Outs for Quarter
Q3 2021/22	7,019	73
Q3 2020/21	6,953	103

The figures are inline with usual trends.

10.3 **Ill Health Pension Benefits**

The release of ill health benefits fall into two main categories, being those for deferred and active members. The administering authority team at Hackney process all requests for the release of deferred members' benefits. Deferred members' ill health benefits are released for life, are based on the benefits accrued to the date of leaving employment, (with the addition of pension increases whilst deferred), but they are not enhanced by the previous employer.

The team also assist the Council's HR team with the process for requests to release an active members' benefits on the grounds of ill health retirement.

Active members' ill health pensions are released on one of three tiers:

- Tier 1 - the pension benefits are fully enhanced to the member's normal retirement date – paid for life, no review
- Tier 2 – the pension benefits are enhanced by 25% - paid for life, no review
- Tier 3 - the pension benefits accrued to date of leaving employment - paid for a maximum of 3 years and a review undertaken when pension has been in payment for 18months.

The applications received have been similar in volume compared to the same period in the previous year:

DEFERRED MEMBER'S ILL HEALTH RETIREMENT					
	CASES RECEIVED	SUCCESSFUL	UNSUCCESSFUL	ONGOING	WITHDRAWN
Q3 2021/22	1	0	1	2	0
Q3 2020/21	0	0	0	0	0

ACTIVE MEMBER'S ILL HEALTH RETIREMENT CASES					
	CASES RECEIVED	BENEFITS RELEASED ON TIER 1	BENEFITS RELEASED ON TIER 2	BENEFITS RELEASED ON TIER 3	UNSUCCESSFUL
Q3 2021/22	1	1	0	0	0
Q3 2020/21	2	2	0	0	0

10.4 **Internal Disputes Resolution Procedure (IDRP)**

This is the procedure used by the Fund for dealing with appeals from members both active and deferred. The majority of the appeals are in regard to either disputes around scheme membership or the non-release of ill health benefits. The process is in two stages:-

- Stage 1 IDRP's are reviewed and determinations made either by the Pensions Manager or by a senior technical specialist at the Fund's pension administrators, Equiniti.

- Stage 2 IDRP's are determined by the Group Director, Finance & Corporate Resources taking external specialist technical advice from the Fund's benefits consultants.

Stage 1 – Two applications were submitted in this quarter against the administering authority. One was in relation to a refund dispute, which was not upheld. The second was in relation to a Cash Equivalent Transfer Value (CETV) dispute and at the date of writing the report investigations are still ongoing.

Stage 2 – No applications were received in this quarter.

10.5 **Other work undertaken in Q3 2021/22**

Third Party Administration Implementation update

As previously reported, the major outstanding point of delivery under the new contract specification is in relation to employer interfaces and member online services. These were delayed due to the onset of the COVID-19 outbreak in the UK in late March 2020 which unfortunately halted the planned rollout and training programme. However, the first phase of the employer online portal work is in progress. The inhouse Hackney pension team has worked closely with the project delivery manager from Equiniti and have agreed a detailed specification proposal. Employer training for the portal was held and follow-up work is now in progress with the employers. At the time of writing, it is anticipated that the council, the largest employer, will move into the "live" environment imminently and several other smaller employers are now ready to fully onboard into live.

Address Tracing and Verification Exercise

As referred to in previous reports Equiniti have carried out an address tracing and verification exercise on the entire deferred member population. This was in order to help to trace those members which the Fund currently holds no current address for, but also to verify that the addresses that are held are still up to date, which is essential for data protection purposes.

Some 2,400 verification letters were sent - these are those in the deferred population that were flagged as living at a different address to that which was currently held on the administration system, or where no current address was held on the system. The overall response rate has been 49%.

This leaves some 1,200 addresses which require a chaser verification letter. The Fund is working with Equiniti to issue these.

Equiniti also identified some 500 addresses that have not generated a result from the electronic tracing nor from a further manual trace. This group had no last known address held on compendia and therefore can prove very difficult to trace. Following a deep dive on the backing documents held on members' records, last known addresses were found. An additional electronic trace was performed which found address matches for over half. A manual trace was then performed on the remaining 200 and 142 of these still show a nil result.

McCloud Programme Update

Programme background

Regulatory changes are required to rectify the age discrimination identified in the transitional protections put in place across the public sector in moving from final salary to career average revalued earnings (CARE) benefits schemes in 2014 and 2015. The key features of the proposed remedy for the LGPS include levelling up benefits for the younger members who suffered discrimination using a form of final salary underpin. Final regulations are now expected to be effective from 1 April 2023 (see Regulatory Update Report) and will relate to an underpin period from 1 April 2014 to 31 March 2022.

In order to prepare the Hackney Pension Fund for the expected regulatory changes the administering authority has set up a Programme to ensure smooth and timely implementation of the changes in the regulations.

Update

The Public Service Pension and Judicial Offices Bill was considered by the Public Bill Committee on 27 January and some amendments were made concerning the LGPS. This is the Bill which, when enacted, will enable the Department of Levelling up, Housing and Communities (DLUHC) to make the regulations needed to implement the McCloud remedy within the LGPS.

DLUHC's consultation response following the 2020 consultation on LGPS Regulations is expected before the Summer Recess, along with a first set of LGPS regulations which will set the end date for the remedy period (expected to be 31 March 2022 assuming the Bill becomes an Act by that date). A second set of LGPS regulations will be issued later this year containing details of how the underpin will operate. Final regulations are still not expected to be in force before 1 April 2023 and may be delayed until 1 October 2023 in line with the expected timeframe for the unfunded schemes.

The amendments to the Bill include:

1. changes to the qualification criteria meaning that more members are now in scope
2. a requirement for multiple periods of service to be aggregated to qualify for McCloud
3. provisions for teachers to be offered membership of the LGPS in respect of 'excess teacher service'

With regards to the first amendment, the London Borough of Hackney Pension Fund have been collecting data for the category of members now in scope and so there is no impact on the work currently underway.

The amendments relating to the second and third points will be discussed at upcoming workstream meetings and appropriate actions agreed and implemented.

Workstreams are progressing with regular meetings being attended by key Hackney pensions officers and representatives from Equiniti and Aon. Good progress is being made in relation to the Data, Communications, Finance and Governance Workstreams. The Ongoing Administration and Systems and Benefits Rectification workstreams are still slightly behind where we would want them to be at this stage of the project. However, regular meetings for the Ongoing Administration and Systems and Benefits Rectification workstreams should be in place in the next few weeks.

The Programme update is as follows:

- Within the Data Workstream, nearly all employers have now submitted their data and the reconciliation of this data is almost complete. Officers have also met with Equiniti regarding the data reconciliation and queries arising from this. For the small number of employers who have not yet submitted data and those employers where there are data queries, a deadline of 31 March 2022 has been given in order that this doesn't adversely affect or delay progress in other workstreams. For employers where data discrepancies are being found and cannot be confirmed (such as Hackney Council where the original data was lost in the cyber-attack) and for those employers who don't submit their data by 31 March 2022 deadline, a data acceptance principles document has been drafted by the project team and will be approved by the Programme Management Group in the next couple of weeks.

- The Communications, Finance and Governance workstreams' actions are now up to date, and meetings will continue to ensure future planning of programme deliverables. There may be some further actions to consider once the regulatory changes are confirmed by DLUHC.

- Planning work is still required for the Ongoing Administration and Benefit Rectification workstreams to ensure that all programme deliverables are achieved as set out in the Programme Charter. A workstream lead from Equiniti has now been determined for each workstream and draft plans and key milestones are being worked on by Equiniti. These are due to be shared with the project team very shortly. Also, Equiniti have recently appointed a new Client Relationship Director who has overall responsibility for the programmes deliverables and will provide support to the programme when required

- For the Specialist Cases workstream, an initial workshop was held last year, and it has been agreed within the project team to put this workstream on hold until after the final regulations have been published, with the expectation of guidance for certain types of cases.

- Risks for all workstreams continue to be actively managed within the programme and these are reviewed regularly by the Programme Management Group (PMG). There are no new key risks identified by the PMG since the last update.

Whilst the overall project is running slightly behind the original schedule, principally due to the slower than expected progress with the Ongoing Administration and Benefit Rectification workstreams, this needs to be considered in the context of the regulatory timetable. It is expected that these workstreams will be able to make good progress on receipt of the high-level plans from Equiniti which are expected imminently. We do however need to maintain our momentum as part of our ongoing programme management to ensure that all key deliverables are met. A further update will be provided at the next meeting.

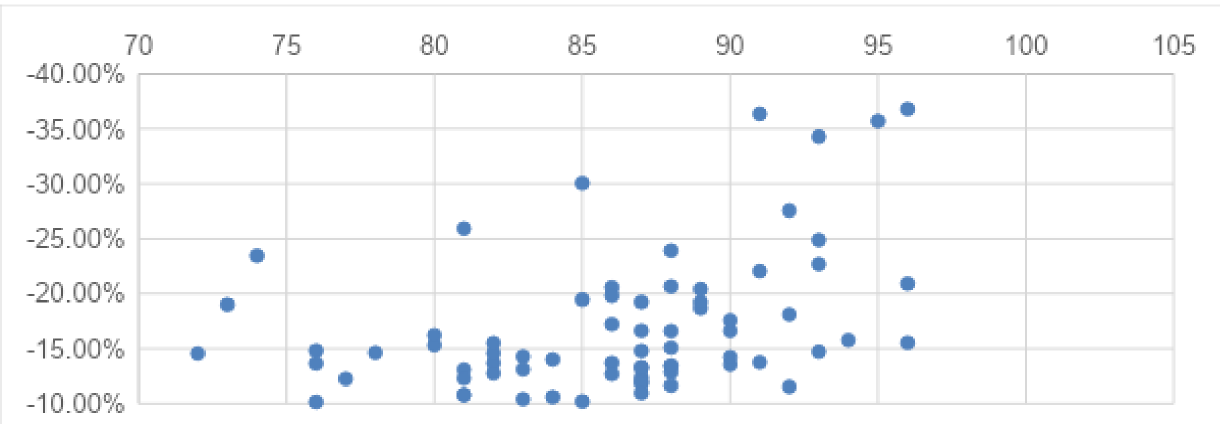
Guaranteed Minimum Pension (GMP) Reconciliation

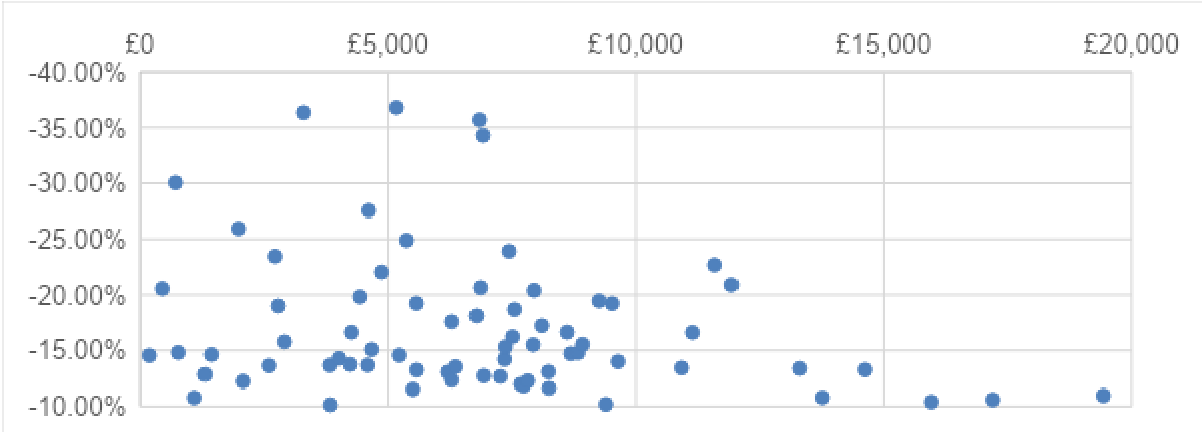
At the meeting on 23rd November 2021, the Committee was provided with an update on the number of members affected by the GMP reconciliation exercise and some data analysis was provided. As you will recall, underpaid pensioners had their pensions corrected (and the arrears paid) in the October pensioner payroll, and overpaid pensioners had their pensions decreased from the November pensioner payroll.

The Fund confirms that the figures provided in November are final, as Equiniti have confirmed that the one month additional interest was immaterial and so there is no change to the figures previously provided. The table and graphs have been included again here for completeness.

Item	Number
Underpayment cases	71
Overpayment cases	414
Arrears for underpayment cases to 31 October 2021	£61,362
Interest due on arrears as at 30 September 2021	£7,778
Write off on overpayment cases to 30 November 2021	£1,837,470
Change in pensioner payroll (increases)	£6,418
Change in pensioner payroll (reductions)	-£175,913
Net change to pensioner payroll	-£169,495

The first scatter chart below shows the spread of these members based on the percentage reduction and the members' current age. The chart indicates that the members with the highest percentage reduction are among the oldest members affected, which is to be expected given that these pensions are likely to have been in payment for the longest period. The second scatter chart shows the spread of the same 71 members based on the percentage reduction and the amount of pension the members were in receipt of prior to the reduction. This chart indicates that the members with the highest percentage reductions are in receipt of relatively small pensions.





As previously reported to the committee the above figures do not contain the figures in relation to those member groups which were descoped from the main reconciliation process. The first group are members who became entitled to their GMP before reaching their State Pension Age and therefore required more complex calculations and checks. The second group is 240 survivor pensioners, who were also identified as requiring additional investigations and checks. A more detailed scope of the issues and the actions which need to be taken has now been received by the Fund and, at the date of writing, is in the process of being reviewed. It is anticipated that a verbal update will be given at the meeting regarding this.

11. REPORTING BREACHES

11.1 There have been no reportable breaches in the last quarter.

Ian Williams
Group Director, Finance & Corporate Resources

Appendices:
Appendix 1 – Investment Performance Report (Hymans Robertson – Investment Consultant)
Appendix 2 – LAPFF Quarterly Engagement Report
Appendix 3 - Funding Level Update (TO FOLLOW)

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