

LONDON BOROUGH OF BROMLEY PENSION FUND INVESTMENT STRATEGY STATEMENT (ISS)



INTRODUCTION

This Statement has been prepared by the London Borough of Bromley (the Administering Authority) to set out the Investment Strategy for the London Borough of Bromley Pension Fund (the Fund), in accordance with Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 and the guidance paper issued by the Department for Communities and Local Government, having consulted with such persons as it considers appropriate.

The Regulations provide that an administering authority must prepare, maintain and publish a written statement of the principles governing its decisions about investments. The Regulations specify six issues that must be addressed in the statement. The following sections of this statement address these issues in turn.

This statement will be kept under review and revised from time to time, but at least every three years.

(a) Investing fund money in a wide variety of investments

The Fund's main long-term objective is to ensure that it has sufficient assets to meet its pension liabilities as they fall due. In order to achieve this, the Fund invests its assets with the aim of maximising investment returns whilst maintaining an acceptable risk level.

The Fund's asset allocation strategy of 70% Global Equities, 20% Fixed Income and 10% Diversified Growth Funds aims to ensure that the Fund's assets are broadly diversified in terms of geographic, foreign exchange, sector or asset class exposure to help reduce overall portfolio risk and volatility, whilst aiming to deliver or exceed the target returns on its investments.

Within these classes, there are three investment managers with a mandate to invest in Global Equities, two for Fixed Income and two Diversified Growth Funds, who are all authorised to invest in all assets permitted under the Regulations, subject to the provisions of their benchmarks and certain minor restrictions. Details of the Investment Guidelines and Restrictions are included below.

(b) The suitability of particular investments and types of investments

The funding strategy adopted for the 2016 valuation is based on an assumption of real investment return of 2.0% per annum above CPI inflation for past service benefits and 2.65% above inflation for future service benefits. In order to maintain as stable as possible a level of employer contributions, the investment returns of the Fund are targeted to match this level.

The trustees of the Fund, the Pensions Investment Sub-Committee, recognise the changing nature of the cash flow and liquidity requirements of the Fund as it matures, with increasing cash outflows from the payment of benefits exceeding cash inflows from employer and employee contributions leading to a cash-negative position which requires investment income to meet its liabilities.

The asset allocation strategy and investment manager selection will be kept under review to ensure that it is able to meet the future cash flow and liquidity requirements of the Fund whilst aiming to meet or exceed the target return and maintain an appropriate balance of risk and volatility.

(c) The approach to risk, including the ways in which risks are to be assessed and managed

At the last full valuation of the Fund (as at 31st March 2016), the Scheme Actuary valued the fund's assets at 91% of the fund's liabilities (82% in the previous valuation as at 31st March 2013), and determined employers' contribution rates with a view to achieving 100% solvency over a 12-year period, taking into account the investment strategy as set out in this statement.

The Pensions Investment Sub-Committee has set targets to out-perform various benchmarks and it believes that the risks associated with a high allocation to growth assets, in particular equities, are justified by the need to improve its funding level and maintain employer contribution rates at a relatively stable level.

By maintaining a diverse portfolio through multiple asset classes and fund managers, the investment strategy is designed to mitigate investment risks such as:

- Concentration/credit – The risk of underperformance or default from a significant allocation to any single investment or type of investment.
- Illiquidity – The risk that the Fund has insufficient liquid assets to meet its cash flow requirements.
- Currency risk – The risk that the currencies of the Fund's assets underperform relative to Sterling.
- Manager underperformance – The failure by the investment managers to achieve their benchmark rate of investment return.

Other key risks that could have an adverse impact on the achievement of the fund's funding strategy and target funding levels are analysed in the fund's Funding Strategy Statement, where they are analysed over financial, demographic, regulatory and governance risks.

(d) The approach to pooling investments, including the use of collective investment vehicles and shared services

The Fund formally became a member of the London Collective Investment Vehicle (CIV) in October 2016 as part of the Government's pooling agenda. The London CIV has been operational for some time and is in the process of opening a range of sub-funds covering liquid asset classes, with less liquid asset classes to follow.

Following the outcome of the asset allocation review in February 2017, work will commence on exploring options to transfer investments into the CIV. Assets may be retained outside of the London CIV pool, for example if it is not deemed cost effective in terms of management fees and transition costs, or if the CIV does not have a suitable sub-fund which meets the requirements of the Funds asset allocation and investment strategy.

(e) How social, environmental and corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments;

The authority has been advised that its primary responsibility is to secure the best returns for the fund in the interests of its council taxpayers and its members. The Council has decided to take no action at this time in developing an ethical investment policy, having also considered:

- the difficulties involved in identifying companies meeting any ethical investment criteria;
- the possibility of judicial review in the case of any company included in error;
- the difficulty and cost of monitoring any policy;
- the unpredictable impact on investment performance;
- the complications that would arise in relation to performance measurement;
- the requirement this would imply for segregated mandates for all investment managers, potentially leading to increased management and custody costs, and
- the lack of support for such a policy from other employers in the fund.

The authority therefore does not impose any obligation on the investment managers to take account of such considerations in making investments other than to require that investments are not made contrary to UK foreign policy or UK defence policy. However, the managers seek to encourage best corporate practice in companies' management of the social, environmental and ethical impact of their activities. They seek to achieve this by engaging in dialogue with companies in which they invest in order to encourage them to improve policies and practices. In their investments they seek to favour those companies that pursue best practices provided it does not act to the detriment of the return or risk of the portfolio. They also take account of any social, environmental or ethical factors that they consider to be relevant to investment risk.

(f) The exercise of the rights (including voting rights) attaching to the investments

The investment managers have been authorised to exercise voting rights on behalf of the Fund unless specifically instructed to vote in a particular way on any individual resolution. In exercising those rights, they will have regard to the Combined Code issued by the Hampel Committee on Corporate Governance. They have been instructed to report back to the Council's Pensions Investment Sub-Committee every quarter on any material divergence from the recommendations of the Combined Code by companies in which the Council is invested and on action taken by them in response to the divergence. They have also been instructed to report to the Sub-Committee at least every six months on their corporate governance activities generally, including their dialogue with companies' management to encourage sound social, environmental and ethical practices in their activities.

The Sub-Committee will issue instructions on individual matters only in exceptional circumstances, when asked for instructions by a manager or when a specific resolution is brought to their attention. With regard to other rights such as the taking up of rights issues, this is left for the investment managers to decide in the light of their assessment of market conditions at the time.

INVESTMENT GUIDELINES AND RESTRICTIONS

General

Investment is permitted in all classes of assets, subject to the limits imposed by the Regulations on the proportion of the fund which may be invested in certain investments and certain other restrictions imposed by the authority. In addition, the investment managers do not use certain investments as a matter of policy.

All references to percentages in this appendix are to percentages of the total value of all existing investments in the fund before making the investment which is subject to the limit. The limits only apply at the time the investment is made.

Limits imposed by the Regulations

- 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(d): 5%

Other restrictions imposed by the authority

- Cash held at custodian's bank is not to exceed £2.5m for each individual fund manager, with any excess placed on the money market with the main clearing banks or placed in institutional cash funds approved by the authority
- No sub-underwriting
- Certain limits on use of futures and options are recorded in the relevant investment management agreements and fund prospectuses
- All contributions to any single partnership: 2%
- All contributions to partnerships: 5%
- All deposits with any local authority or precepting body which is an exempt person (within the meaning of the Financial Services and Markets Act 2000) in respect of accepting deposits as a result of an order made under section 38(1) of that Act, and all loans: 10%
- All deposits with any single bank, institution or person (other than the National Savings Bank): 10%
- All investments in unlisted securities of companies: 10%
- Any single holding in unlisted securities: 2% (limit imposed by the authority)
- Any other single holding, apart from investments in OEICs and unit trusts: 10% (there is no limit on investment in single OEICs or unit trusts)
- Any single insurance contract: 25%
- All securities transferred under stocklending arrangements: 25%

Asset Allocation

The current investment strategy comprises the following strategic asset allocations:

	%
Global Equities	70
Fixed Income	20
Diversified Growth	10
Grand Total	100

The strategic asset allocations are regularly compared to the actuals and adjusted where required following appropriate advice from the Fund's Independent Investment Advisor.

The Fund Managers have been set the following targets/benchmarks which their performance is measured against:

- Global equities – Baillie Gifford, Blackrock and MFS are all required to outperform the MSCI All Countries World Index.
- Fixed income – Baillie Gifford are required to outperform 88% Sterling Aggregate Benchmark (50% FTSE UK Conventional Gilts Actuaries All stocks index and 50% Bank of America Merrill Lynch Sterling Non-Gilt Index), 6% JP Morgan GBI-EM Global Diversified Index un-hedged in Sterling and 6% Bloomberg Barclays Global Aggregate Credit GBP Hedged Index; Fidelity are required to outperform 50% iBoxx Gilts/50% iBoxx non-Gilts.
- DGF – Baillie Gifford are required to achieve Base Rate + 3.5%; Standard Life are required to achieve 6 month Libor + 5%.