



Meeting: **Local Pension Committee**

Date/Time: **Friday, 24 January 2020 at 9.30 am**

Location: **Guthlaxton Committee Room, County Hall, Glenfield**

Contact: **Miss C Tuohy (0116 305 5483).**

Email: **cat.tuohy@leics.gov.uk**

AGENDA

<u>Item</u>	<u>Report By</u>	<u>Marked</u>
1. Minutes of the meeting held on 8 November 2019.		(Pages 3 - 10)
2. Question Time.		
3. Questions asked by members under Standing Order 7(3) and 7(5).		
4. Declarations of interest in respect of items on the agenda.		
5. To advise of any other items which the Chairman has decided to take as urgent elsewhere on the agenda.		
6. Responsible Investment Plan 2020.	Director of Corporate Resources	(Pages 11 - 20)
7. Overview of the Leicestershire Pension Fund Asset Allocation Strategy.	Director of Corporate Resources	(Pages 21 - 34)
8. Any other items which the Chairman has decided to take as urgent.		



9. Exclusion of the Press and Public.

The public are likely to be excluded during consideration of the remaining item in accordance with Section 100(A)(4) of the Local Government Act 1972 (Exempt Information).

10. Annual Review of the Asset Strategy and Structure.

Director of
Corporate
Resources

(Pages 35 - 94)

TO:

Leicestershire County Council

Mr. P. C. Osborne CC (Chairman)
Mr. T. Barkley CC
Mr. P. Bedford CC

Dr. S. Hill CC
Mr. Max Hunt CC

Leicester City Council

Cllr Deepak Bajaj and Cllr. Ratilal Govind

District Council Representatives

Cllr Chris Frost and Cllr. Malise Graham MBE

University Representative

Mr. Z. Limbada

Staff Representatives

Mr. N. Booth
Ms. J. Dean

Mr. A. Wilson



Minutes of a meeting of the Local Pension Committee held at County Hall, Glenfield on Friday, 8 November 2019.

PRESENT:

Leicestershire County Council

Mr. P. C. Osborne CC (Chairman)
Mr. T. Barkley CC
Mr. I. E. G. Bentley CC

Dr. S. Hill CC
Mr. Max Hunt CC

Leicester City Council

Cllr. Ratilal Govind

Leicester City Council

District Council Representative

Cllr Chris Frost

University Representative

Mr. Z. Limbada

Staff Representatives

Mr. N. Booth

60. Minutes.

The minutes of the meeting held on 6 September 2019 were taken as read, confirmed and signed.

61. Question Time.

The Chief Executive reported that no questions had been received under Standing Order 35.

62. Questions asked by members.

The Chief Executive reported that no questions had been received under Standing Order 7(3) and 7(5).

63. Urgent Items.

There were no urgent items for consideration.

64. Declarations of interest.

The Chairman invited members who wished to do so to declare any interest in respect of items on the agenda for the meeting.

No declarations were made.

65. Pension Fund Valuation.

The Committee received a report by the Director of Corporate Resources and Hymans Robertson, the Fund's Actuary, regarding the draft valuation results for the Leicestershire Pension Fund. A copy of the report marked 'Agenda Item 6' is filed with these minutes.

Arising from the discussion the following points were noted:-

- i) While staffing levels of employers in the Fund had stabilised, due to auto-enrolment the number of members in the fund continued to increase as less employee's chose to 'opt-out' of the LGPS.
- ii) In order to measure the funding position of the Leicestershire Pension Fund the Actuary, Hymans Robertson, compared the value of the Fund's assets against its liabilities by making an assumption regarding the future investment returns. Hymans were prudent in the assumption of future investment returns and derived that there is an 80% likelihood of the investments achieving at least an annual return of 3.8%. A prediction over 70% was considered low risk for a statutory body. It was noted that whilst a higher investment risk approach could be taken to try and reach a fully funded position, the Committee understood the Fund's approach which carefully balanced the risk.
- iii) The model set out by Hymans was also used in the approach to set employer contribution rates and the projection of employer's future benefit payments, contributions and investment returns. Each employer would be valued separately based on their own membership data and consultation would commence following the Fund's Annual General Meeting on the 18th November 2019.
- iv) The Committee were pleased to note the strong position of the Fund, with an 38% increase in asset value since 2016. The Fund was cash flow positive, meaning that the Fund could lock away assets which would provide better results over time.
- v) The Fund was undertaking engagement with the Fund's employers to understand the financial risk they faced. Each employer was grouped based on their risk profile. Councils were considered the lowest risk group due to their statutory tax raising powers, universities and colleges were deemed more of a risk and private sector bodies the highest. Following the Fund's Annual General Meeting and the Employers Forum the Pensions Manager would write to all employers, informing them on rates, cash flow and the

investment return so that they could enter into a discussion about the rates they would pay.

- vi) If changes to pensions regulations arising from McCloud or changes to the pension age came into effect the Fund would revisit rates, however officers felt the prudent approach to the investment return took into account such risks.

RESOLVED:

- a) That the draft Funding Strategy Statement be approved for consultation, to commence following the Leicestershire Pension Fund Annual General meeting on the 18 November 2019;
- b) That the framework for setting individual employer rates be noted;
- c) That the whole fund results be noted.

66. Change in Order of Business.

The Chairman requested and obtained the Committee's consent to change the order of business from that set out on the Agenda.

67. The Pensions Regulator "Deep Dive" Findings.

The Committee received a report by the Director of Corporate Resources inform members of the Pension Regulator findings following their 'deep dive' into the administration of ten pension funds. A copy of the report marked 'Agenda Item 14' is filed with these minutes.

RESOLVED:

That the report be noted.

68. LGPS Transfer of Pension Rights

The Committee received a report by the Director of Corporate Resources which was to recommend a minor changes to the policy for transfer of pension rights to the Leicestershire Local Government Pension Scheme A copy of the report marked 'Agenda Item 15' is filed with these minutes.

The Director explained that "Non-Club" schemes was the term used to describe private companies which were not part of the Leicestershire Pension Scheme.

RESOLVED:

That the changes to the acceptance of pension transfers, as detailed in paragraphs 6-8 of the report, are approved.

69. Summary Valuation of Pension Fund Investments and Performance of Individual Managers.

The Committee received a report from the Director of Corporate Resources, the purpose of which was to present a summary valuation of the Fund's investments at 31st September 2019. A copy of the report is filed with these minutes, marked 'Agenda Item 7'.

The Committee noted that the Fund was overweight in equities by 3% as a result of stronger performance in this asset class compared to others in which the Fund invested. The investment decisions made by the Investment Subcommittee, as set out elsewhere on the agenda, would help address the imbalance.

RESOLVED:

That the report be noted.

70. Pension Fund Annual Report.

The Committee received a report from the Director of Corporate Resources regarding the Leicestershire Pension Fund's Annual Report and Accounts 2018/19. A copy of the report is filed with these minutes, marked 'Agenda Item 8'.

It was noted that as a result of new regulations allowing members of the scheme to retire and receive early payment of their pension from age 55, there had been an increase in the number of members 'retiring early'.

RESOLVED:

That the Pension Fund Annual Report and Accounts for 2018/19 be approved.

71. Investment Strategy Statement Update.

The Committee received a report from the Director of Corporate Resources on the updated draft Investment Strategy Statement (ISS). A copy of the report marked 'Agenda Item 9' is filed with these minutes.

The Director confirmed that LGPS Central were also a signatory to the environmental, social and governance (ESG) principals set out in the updated ISS which supported the conclusion that effective management of ESG concerns would protect investment returns over the long term.

It was agreed that officers would further consider how employees could be encouraged to engage in the consultation process.

RESOLVED:

- a) That the revised Investment Strategy Statement be approved for consultation;

- b) That a further report be submitted to the Local Pension Committee regarding the outcome of the consultation and to present the final Investment Strategy Statement for approval.

72. Advisor Objectives.

The Committee received a report from the Director of Corporate Resources on the proposed Advisor Objectives for Hymans Robertson. A copy of the report is filed with these minutes, marked 'Agenda Item 10'.

RESOLVED:

That the Advisor Objectives be approved.

73. Actions of the Investment Subcommittee.

The Committee received a report by the Director of Corporate Resources providing an update on the actions taken by the Investment Subcommittee. A copy of the report is filed with these minutes, marked 'Agenda Item 11'.

The Committee noted that as a result of LGPS Central having yet to develop a private equity or private debt fund, it was deemed appropriate to make further investment with the Fund's current investment managers in private equity and debt to help maintain the Fund's strategic allocation.

RESOLVED:

That the report be noted.

74. Risk Management and Internal Controls.

The Committee received a report from the Director of Corporate Resources on the revised risk register. A copy of the report marked 'Agenda Item 12' is filed with these minutes.

Following the Pension Regulators' 'Deep Dive', Pension Fund the Committee noted that officers would add the risk on cyber security to the risk register.

RESOLVED:

That the revised risk register of the Pension Fund be approved.

75. Pension Fund Training Policy.

The Committee received a report from the Director of Corporate Resources seeking the approval for the Leicestershire Pension Fund Training Policy. A copy of the report is filed with these minutes marked 'Agenda Item 13'.

Members noted that training would be organised to follow the Local Pension Committee meetings where possible.

RESOLVED:

That the Pension Fund Training Policy be approved.

76. Date of Next Meeting.

RESOLVED:

To note that the next meeting of the Local Pension Committee would be held at 9.30am on 24 January 2020.

77. Exclusion of the Press and Public.

RESOLVED:

That under Section 100(A) of the Local Government Act 1972 the public be excluded from the meeting for the remaining items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12(A) of the Act.

78. Emerging Markets Equity Active Multi Manage Fund Quarterly Factsheet

The Committee considered a report by LGPS Central, a copy of which marked 'Agenda Item 19' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

79. Leicestershire Pension Fund Emerging Markets Debt Portfolio.

The Committee considered a report by LGPS Central, a copy of which marked 'Agenda Item 20' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

80. Leicestershire Targeted Return Portfolio.

The Committee considered a report by LGPS Central, a copy of which marked 'Agenda Item 21' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

81. Global Equity Active Multi Manager Fund Quarterly Factsheet.

The Committee considered a report by LGPS Central, a copy of which marked 'Agenda Item 22' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

82. Aspect Capital Quarterly Report

The Committee considered a report by Aspect, a copy of which marked 'Agenda Item 23' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

83. Kames Capital Quarterly Report

The Committee considered a report by Kames Capital, a copy of which marked 'Agenda Item 24' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

84. Legal and General Investment Manager Quarterly Report

The Committee considered a report by Legal and General, a copy of which marked 'Agenda Item 25' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

85. Millennium Global Quarterly Report

The Committee considered a report by Millennium Global, A copy of which marked 'Agenda Item 26' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

86. Pictet Quarterly Report

The Committee considered a report by Pictet, A copy of which marked 'Agenda Item 27' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted.

87. Ruffer Quarterly Report

The Committee considered a report by Ruffer, A copy of which marked 'Agenda Item 28' is filed with these minutes. The report was not for publication by virtue of paragraphs 3 and 10 of Part 1 of Schedule 12(A) of the Local Government Act 1972.

RESOLVED:

That the report be noted

CHAIRMAN

08 November 2019



LOCAL PENSION COMMITTEE – 24 JANUARY 2020

REPORT OF THE DIRECTOR OF CORPORATE RESOURCES

DRAFT RESPONSIBLE INVESTMENT PLAN

Purpose of the Report

1. The purpose of this report is to seek the Committee's approval of a Responsible Investment (RI) Plan 2020 (Appendix) to enable the Leicestershire Pension Fund (the Fund) to improve management of responsible investment risks.

Background

2. The relevant regulations and guidance for this paper are noted below:
 - The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016
 - 7(2)(e) the authority's policy on how social, environmental and corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments; and
 - 7(2)(f) the authority's policy on the exercise of the rights (including voting rights) attaching to investments.
 - Relevant statutory guidance: "Local government pension scheme: guidance on preparing and maintaining an investment strategy statement"
 - UK Stewardship Code 2020
3. Leicestershire County Council Officers have developed a 2020 RI plan (Appendix A) with LGPS Central's in-house RI team.
4. In November 2019 the Scheme Advisory Board (SAB) published a consultation on draft Responsible Investment Guidance. The draft explains the existing regulations and statutory guidance to administering authorities in order to make their current duties clear. "Part Two" of the guidance is expected to follow the SAB's meeting on 3rd February 2020. Whether the Ministry of Housing, Communities, and Local Government (MHCLG) intends to review the regulations and statutory guidance is unclear.

Responsible Investment and Stewardship Definition

5. The term 'responsible investment' refers to the integration of financially material environmental, social and corporate governance ("ESG") factors into investment

processes. It has relevance both before and after the investment decision and is a core part of our fiduciary duty. It is distinct from 'ethical investment', which is an approach in which the moral persuasions of an organisation take primacy over its investment considerations.

6. The term stewardship is defined by the Financial Reporting Council's (FRC) Stewardship Code (2020 version): "Stewardship is the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society."

Adherence to the UK Stewardship Code 2020

7. The 2020 Stewardship Code represents a significant increase in level of ambition compared to the 2012 version. Even current signatories will need to review their approach to stewardship, and reporting thereof, in light of the new code. Were the Fund to decide to sign the Stewardship Code, reporting would not be required until 2021. The Fund currently undertakes a minority of the activities required for compliance with the 2020 code. This includes having a published policy and investment beliefs, and company engagement via LGPS Central (Central). Many of the remaining compliance requirements including communication of stewardship activities, integration of ESG and climate change investment factors, monitoring fund managers for ESG form our recommendations below.

Responsible Investment Plan 2020

8. Central's in-house RI team have reviewed our current compliance and state that the fund, 'achieves compliance via its Investment Strategy Statement with the minimum regulatory standard.'
9. This draft plan improves on the approach and beliefs detailed in the Investment Strategy Statement.
10. The draft RI plan for 2020 is shown below.
 - It includes a number of improvements from our current reporting and sets the fund up to review its readiness for becoming a signatory to the UK Stewardship code 2020.
 - The plan includes mention of Climate Risk Report that will be bought to the Fund by LGPS Central's in-house RI Team. This report will analyse our listed equity and corporate bonds to produce a number of reports including carbon footprints and exposure to green revenues.

Timeline	Title	Description
Q4 19/20	Communicate RI Strategy	Publication of the Fund's RI plan.
	Responsible Investment Guidance	SAB expected to issue final guidance in February. Fund draft response, including update of this plan to Local Pension Board before report to Committee.
	RI Training for Local Pension Board	
Q1 20/21	Quarterly stewardship reporting	Inclusion in Committee papers of LGPS Central's Quarterly Stewardship Report
	RI Training for Local Pension Committee	
	Voting report inclusion in Committee papers	Reporting explaining the execution of shareholder voting on the Fund's listed equity investments. To include funds managed by LGPS Central and LGIM initially.
Q2-Q3 20/21	Quarterly manager reporting on ESG	The formal inclusion by external fund managers of ESG information in quarterly reporting in order to facilitate regular monitoring.
	New manager selections: integrate ESG where relevant	Include an ESG assessment in processes for appointing fund managers.
	Receive Climate Risk Report	Report comprising (i) Climate scenario analysis (ii) Carbon risk metrics (iii) Annual Climate Stewardship Plan.
Q3 20/21	Climate Strategy	Publish a climate strategy based on the key findings of the Climate Risk Report. To be done ahead of Hymans Robertson's 2021 strategic asset allocation refresh so the Fund can fully embed their RI strategy in investment decision-making.
	Climate Risk Training	Training of pension fund officers, Pension Committee and Pension Board on the risks and opportunities associated with climate change, and the Fund's Climate Strategy.
	TCFD Report (Taskforce on Climate related Financial Disclosures)	Public-facing report of the Fund's approach to climate risk, set out in alignment with the recommendations of the Taskforce on Climate-related Financial Disclosures
	Mid-year review	Assess preparedness for UK Stewardship Code Review RI Strategy and capture any developments in the regulations, statutory guidance, or RI Guidance from the Scheme Advisory Board.
	Annual Report	Revised report including new RI content, review by Board before approval at Committee.

Recommendation

- a) It is recommended that the Responsible Investment Plan 2020 be approved.
- b) That the Director of Corporate Resources be authorised to make any necessary minor alterations to the Plan, following its consideration by the Local Pension Board.

Equality and Human Rights Implications

11. None.

Appendix

Draft Responsible Investment Plan 2020

Background Papers

None

Officers to Contact

Mr C Tambini, Director of Corporate Resources
Tel: 0116 305 6199 Email: Chris.Tambini@leics.gov.uk

Mr D Keegan, Assistant Director Strategic Finance and Property
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Leicestershire County Council Pension Fund

DRAFT Responsible Investment Plan

January 2020

About this report

The purpose of this report is to recommend a plan of action to enable the Leicestershire County Council Pension Fund (the Fund) to manage responsible investment (RI) risks. This report has been prepared by LGPS Central's Responsible Investment & Engagement Team.

Defining responsible investment and stewardship

The term 'responsible investment' refers to the integration of financially material environmental, social and corporate governance ("ESG") factors into investment processes. It has relevance both before and after the investment decision and is a core part of our fiduciary duty. It is distinct from 'ethical investment', which is an approach in which the moral persuasions of an organisation take primacy over its investment considerations.

The term stewardship is defined by the Financial Reporting Council's (FRC) Stewardship Code (2020 version): "Stewardship is the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society."

Applicable regulations

The regulations and statutory guidance relating to RI are:

- The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016¹
 - 7(2)(e) the authority's policy on how social, environmental and corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments; and
 - 7(2)(f) the authority's policy on the exercise of the rights (including voting rights) attaching to investments.
- Relevant statutory guidance: "Local government pension scheme: guidance on preparing and maintaining an investment strategy statement"²
- UK Stewardship Code (referred to in the statutory guidance)³

In our view the Fund achieves compliance via its Investment Strategy Statement⁴ with the minimum regulatory standard. We note however the statutory guidance states:

- Funds should sign the Stewardship Code

¹ <https://www.lgpsregs.org/schemeregs/invregs2016/timeline.php#r7>, accessed January 2020

² <https://www.gov.uk/government/publications/local-government-pension-scheme-guidance-on-preparing-and-maintaining-an-investment-strategy-statement>, accessed January 2020

³ https://www.frc.org.uk/getattachment/5aae591d-d9d3-4cf4-814a-d14e156a1d87/Stewardship-Code_Dec-19-Final.pdf, accessed January 2020

⁴ Investment Strategy Statement - consultation version November 2019



- Funds should issue an annual voting report

Both of these represent potential extensions to the Fund's current strategy.

In November 2019 the Scheme Advisory Board (SAB) published a consultation on draft Responsible Investment Guidance⁵. The draft explains the existing regulations and statutory guidance to administering authorities in order to make their current duties clear. "Part Two" of the guidance is expected to follow the SAB's meeting on 3rd February 2020. Whether the Ministry of Housing, Communities, and Local Government intends to review the regulations and statutory guidance is unclear. In light of the evolving regulatory picture, we recommend below that the Fund undertakes a mid-year review of its RI Strategy to capture any relevant developments.

Background

There is a considerable evidence base that long-term investors have scope to improve portfolio risk-return characteristics through the integration of financially material environmental, social and corporate governance (ESG) factors. This includes integration in asset selection, asset stewardship, and the management of material climate-related risks. Evidence includes academic papers, empirical evidence of ESG-managed portfolios achieving outperformance, and well-known case studies of companies failing to (or succeeding in) manage the risks (harnessing the opportunities) associated with ESG and climate change. The evidence base is supportive of the Fund's investment belief that:

"Responsible investment can enhance long term investment performance and investment managers will only be appointed if they integrate responsible investment into their decision-making processes."

A theme in the academic literature is that materiality matters. Focussing on what is relevant – rather than applying a tick box approach – is the avenue most likely to lead to benefits for the Fund. The Fund is recommended, in the suggestions that follow, to focus on certain core issues, rather than adopt a "do everything approach". For example, the adoption of focus stewardship themes, perhaps in collaboration with LGPS Central. This in turn circles back to the Fund's investment belief that "responsible investment can enhance long term investment performance".

Current policy framework at LCCPF

We have reviewed relevant (publicly available) Fund policies / disclosures. We comment further on possible extensions to the policy framework below.

Policy/ disclosure	RI content	Possible extensions
Investment Strategy Statement (<i>consultation version, November 2019</i>)	- LCCPF investment beliefs - LGPS Central RI beliefs - LCCPF current RI approach (Regulations 7(2)(e) and 7(2)(f))	- RI Strategy (as a standalone document)
Annual Report (2019)	-	- Voting report (Regulation 7(2)(f)) - RI annual activity summary - Summary climate-risk report aligned with the TCFD framework
Committee papers	- Public: LGPS Central Tactical Asset Allocation - Restricted: Fund manager reports	- LGPS Central Quarterly Stewardship Report (QSR) - Voting reports - Fund manager reports to include

⁵[https://www.lgpsboard.org/images/Consultations/RIGuidance/DRAFT Part 1 Responsible Investment Guidance Final pdf version.pdf](https://www.lgpsboard.org/images/Consultations/RIGuidance/DRAFT_Part_1_Responsible_Investment_Guidance_Final_pdf_version.pdf), accessed January 2020



		ESG information
Risk Register	Risk types which might be assumed to include RI or climate-risk: 10) Fund performance is below reasonable expectations 11) Failure to take account of ALL risks to future investment returns within asset allocation and manager selection	- Consider specific reference to responsible investment and/ or climate-related risks.
Training Policy	-	- Specific reference to responsible investment and/ or climate-related training.

Adherence to the UK Stewardship Code 2020

The 2020 Stewardship Code represents a significant increase in level of ambition compared to the 2012 version. Even current signatories will need to review their approach to stewardship, and reporting thereof, in light of the new code. The Fund is not currently a signatory. Were the Fund to decide to sign the Stewardship Code, reporting would not be required until 2021. The Fund currently undertakes a minority of the activities required for compliance with the 2020 code. This includes having a published policy and investment beliefs, and company engagement via LGPS Central. Many of the remaining compliance requirements (including communication of stewardship activities, integration of ESG and climate change investment factors, monitoring fund managers for ESG) form our recommendations below. A mid-year review of the Fund's compliance status is recommended.

Recommended focus areas:

We recommend a focus on four areas of responsible investment. These areas relate to the Fund's Investment Beliefs and align with the LGPS regulatory context.

1. RI integration into manager selection and monitoring
2. Focussed stewardship activities
3. Observation & management of climate-related risk
4. Working towards Stewardship Code compliance

We comment further on these areas below.



Recommended RI focus areas

In consideration of the applicable regulations, academic evidence, and current practice undertaken by the Fund, the follow action plan is recommended:

	1	2	3	4
<i>Focus area</i>	ESG integrated into manager selection & monitoring	Focused stewardship activities	Observation & management of climate-related risk	Work towards Stewardship Code compliance
<i>Rationale</i>	<ul style="list-style-type: none"> - Academic evidence on ESG and returns - LCCPF investment beliefs - Regulation 7(2)(e) 	<ul style="list-style-type: none"> - Academic evidence on ESG and returns - Stakeholder expectations of the Fund as a responsible investor 	<ul style="list-style-type: none"> - Financial materiality of climate-related risks over the long term - Stakeholder interest in climate-related risks 	<ul style="list-style-type: none"> - LGPS Statutory Guidance - Ideal reporting vehicle for RI and stewardship activities
<i>Actions</i>	<ul style="list-style-type: none"> - RI training for LPC - Include ESG assessment in processes for appointing fund managers - Include ESG in routine fund manager monitoring, reporting, and retention decisions 	<ul style="list-style-type: none"> - Contribute to and adopt LGPS Central's stewardship themes - Monitor the extent of engagement and voting by external fund managers 	<ul style="list-style-type: none"> - Procure Climate Risk Report for internal use - Publish Climate Strategy based on key findings in the Climate Risk Report - Climate risk training for LPF - Issue public-facing climate report aligned with TCFD - Consider case for include climate risk in the Fund's Risk Register 	<ul style="list-style-type: none"> - Align the Fund's RI strategy to the 2020 Stewardship Code's principles - Issue a Stewardship Code Report with a view to achieving signatory status from the FRC - Mid-year review to assess the remaining gap to full compliance
<i>Implementation vehicle</i>	<ul style="list-style-type: none"> - Selection: Fund advisors/ LGPS Central - Monitoring: Fund managers/ Fund advisors/ LGPS Central 	<ul style="list-style-type: none"> - LGPS Central RI Team - Hermes EOS (LGPS Central's stewardship provider) - LAPFF - Fund managers (voting) 	<ul style="list-style-type: none"> - LGPS Central - Climate Risk Report & Taskforce on Climate-related Financial Disclosures (TCFD) Report 	<ul style="list-style-type: none"> - LGPS Central - External fund managers
<i>Reporting</i>	<ul style="list-style-type: none"> - Local Pension Committee quarterly fund manager reports - Annual report (summary) - Stewardship Code Report 	<ul style="list-style-type: none"> - Include LGPS Central's Quarterly Stewardship Reports with Committee papers - Include Hermes EOS reports with Committee papers - Voting reports to Committee 	<ul style="list-style-type: none"> - Internal: Climate Risk Report - External: TCFD-aligned climate report (include in Annual Report and/ or on the website) 	<ul style="list-style-type: none"> - Stewardship Code Report (2021*)

*this timeline is given by the FRC



RI Timeline

In consultation with LCCPF officers we propose the following RI 2020 plan with the following timeline:

Timeline	Title	Description
Q1	Communicate RI Plan	- Publication of the Fund's RI plan via Pensions Committee / board papers.
Q2	Quarterly stewardship reporting	- Inclusion in Committee papers of LGPS Central's Quarterly Stewardship Report
	RI Training for Local Pension Committee	- Training of Pensions Committees, Fund Officers, or other, on responsible investment & the Fund's RI Strategy.
	Voting report inclusion in Committee papers	- Reporting explaining the execution of shareholder voting on the Fund's listed equity investments. To include funds managed by LGPS Central and LGIM initially.
Q2-Q3	Quarterly manager reporting on ESG	- The formal inclusion by external fund managers of ESG information in quarterly reporting in order to facilitate regular monitoring.
	New manager selections: integrate ESG where relevant	- Include an ESG assessment in processes for appointing fund managers.
	Receive Climate Risk Report	- Annual Report for your internal consumption comprising (i) Climate scenario analysis (ii) Carbon risk metrics (iii) Annual Climate Stewardship Plan.
Q3	Climate Strategy	- Publish a climate strategy based on the key findings of the Climate Risk Report. To be done ahead of Hymans Robertson's 2021 strategic asset allocation refresh so the Fund can embed their RI strategy in investment decision-making.
	Climate Risk Training	- Training of pension fund officers, Pensions Committees, or other, on the risks and opportunities associated with climate change, and the Fund's Climate Strategy.
	TCFD Report (Taskforce on Climate related Financial Disclosures)	- Public-facing report of the Fund's approach to climate risk, set out in alignment with the recommendations of the Taskforce on Climate-related Financial Disclosures
	Mid-year review	- Assess preparedness for UK Stewardship Code Review RI Strategy and capture any developments in the regulations, statutory guidance, or RI Guidance from the Scheme Advisory Board.

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LOCAL PENSION COMMITTEE – 24 JANUARY 2020

REPORT OF THE DIRECTOR OF CORPORATE RESOURCES

OVERVIEW OF THE LEICESTERSHIRE PENSION FUND ASSET ALLOCATION STRATEGY

Purpose of the Report

1. The purpose of this report is to provide the Committee with an overview of the Leicestershire Pension Fund's (the Fund) current strategic investment allocation, activity in year (See Appendix A) and a summary of the proposed future allocation developed by Hymans.

Background

2. The nature of the Fund's liabilities is long-term. The strategic investment benchmark is structured to reflect the nature of liabilities by focusing on the need for long-term returns and a degree of inflation-linked returns. Market fluctuations will cause the Fund's actual asset allocation to vary from the agreed strategic asset allocation and investment within asset classes in which funding is 'drawn down' over a period of time will create further variation. The strategic benchmark should, therefore, be considered an 'anchor' around which the actual asset allocation is managed.
3. The Fund is part invested in funds administered by LGPS Central (Central), a private company jointly owned by the Fund and seven other administering authorities. By pooling investment Central aims to reduce costs and improve investment returns to the ultimate benefit of Fund employers. Central's product offer continues to develop and the strategy review has been undertaken with this in mind. Dialogue continues with Central and other partner funds to ensure that Central's offer meets the goals of the Fund. It is likely to be many years before the majority of the Fund is transferred to Central. This is partly due to the Fund's unlisted and illiquid investments as well as the time taken by Central to develop investment options.
4. The Hymans Strategic Asset Allocation recommendations have been reviewed by Central together with Officers from Leicestershire County Council Pension Fund. Central's review at this stage helps to ensure that there is a strong link between the products being developed and the requirements of the Fund's strategy.

Required Investment Return and Current Performance

5. The strategic investment benchmark is designed around the required future investment return and an acceptable level of risk. Without this clarity it would be possible to have a strategy that targets a return that is very high but takes overly

large risks and as a result has too high a possibility of failing to achieve its target – thereby putting unnecessary upward pressure onto employers’ contribution rates. Likewise, a target that is too low may be easily achieved, but has very little probability of producing the returns needed to lessen future employers’ contribution increases.

6. The Fund currently targets an investment return of 5.9% per annum which is in line with Funding Strategy being adopted post the 2019 triennial review. As at 31 March 2019, the date of actuarial valuation the value of the Fund’s assets was £4.3 billion.
7. The triennial review as at 31 March 2019 showed the Fund had an 89% funding level which had improved from 76% as at 31 March 2016.

Current Strategic Allocation

8. The Fund’s current asset strategy and structure was approved by the Local Pension Committee on 25 January 2019.
9. Since the review the Pension Fund has transferred its active listed global and emerging markets equities to LGPS Central’s equivalent products and entered into an agreement with Central to provide advisory services for some asset classes.
10. As of the 30 September 2019 the assets of the Fund which are currently managed/advised by Central, or passively managed by Legal and General Investment Management (LGIM) i.e. deemed to be pooled, are as follows:

Asset Class	Asset Class	% of Fund [1]		
		Central Investment Services	Central Advisory Services	Passive (by LGIM)
Equities	Global Equities (Active)	8%		
Equities	Global Emerging Markets Equities (Active)	4%		
Equities	Global Equities (Passive & Factor Based)			33%
Equity	Private Equity	[Note 2]		
Real Assets	Property		9%	
Alternatives	Targeted Return		12%	
Alternatives	Emerging Market Debt		3%	
TOTAL		12%	24%	33%
TOTAL			69%	

[1] At 30 September 2019, Source: Portfolio Evaluation

[2] £10million committed.

Equities

11. Our equity positions are outlined below:

Manager	Asset Class	% of Fund [1]
LGIM	UK (large cap exposure capped)	4
LGIM	UK market cap passive	3
LGIM	Regional market cap passive (ex UK)	17
LGIM	Factor based - RAFI (N America & Europe)	9
LGPS Central	Active Global Equities	8
LGPS Central	Active Emerging Markets	4
LGPS Central	Private Equity	<1 [Note 2]
Various others	Private Equity	5
Total	Equities	50
Total Pooled	Including LGIM passive	45
	Excluding LGIM passive	12

[1] At 30 September 2019, Source: Portfolio Evaluation.

[2] £10million committed, approximately 5% invested.

12. Except for the Fund's unlisted private equity, all the Fund's equity investments are being managed by Central or are being managed passively.

Real income assets

13. Our real income positions are outlined below:

Manager	Asset Class	% of Fund [1]	
Kames	Index linked gilts	8	8
IFM	Infrastructure	2	5
KKR		1	
JPM		2	
Stafford	Timberland	3	3
Aviva	Property – fund of funds	4	9
Kames	Property – indirect (smaller lots)	2	
Colliers	Property - direct and indirect	3	
TOTAL	Real Income Assets	25	25

[1] At 30 September 2019, Source: Portfolio Evaluation.

14. Appendix A contains details of the holdings and view to mapping to Central offerings. Leicestershire have expressed interest in a Central sub fund for Property and Infrastructure.

15. The product development protocol that highlights the stage of LGPS Central product development is attached to this report as Appendix B.

Alternative investments

16. Our alternative investment positions are outlined below:

Manager	Asset Class	% of Fund [1]	
Ruffer	Targeted Return	4	12
Aspect		3	
Pictet		4	
Millennium	Currency Overlay	-	-
Ashmore	Opportunities – Emerging Market Debt	3	9
JPMorgan	Opportunities - Credit	1	
Partners	Opportunities – Private Credit	5	
M&G	Opportunities – Other	2	3
CRC	Opportunities – Other	1	
InfraCap	Opportunities – Other	<1	
Standard Life	Opportunities – Other	<1	
TOTAL	Alternative Investments	24	24

[1] At 30 September 2019, Source: Portfolio Evaluation.

17. Appendix A contains details of the holdings and view to mapping to Central offerings for emerging market debt, multi asset credit and targeted return where discussions have commenced.

Key Proposed Changes

18. The annual refresh of the strategic asset allocation is outlined in the table below. Details of the changes are included within an exempt paper.

Asset class	Target Allocation Jan 2020 % Lower & Upper limits
Listed Equities	40.00 44.00
Private equity	4.75
Total Equity	44.75 48.75
Index linked bonds	5.00
Infra / Timberland	9.75
Property	10.00
Real assets	24.75
Targeted Return	7.50
Emerging Market Debt	2.50
Investment grade credit	3.00
Liquid multi-asset credit	4.00
Global credit and opportunity	10.50
Alternatives	27.50

Supplementary Information

An exempt paper providing further detail of the proposed changes to the Fund's target allocation, which is of a sensitive nature, is included elsewhere on the agenda.

Recommendation

The Committee is asked to note the report

Equality and Human Rights Implications

19. None.

Background Papers

Report to the Local Pension Committee – 25 January 2019 – Annual Review and the Asset Strategy and Structure

<http://politics.leics.gov.uk/ieListDocuments.aspx?CIId=740&MIId=5803&Ver=4>

Appendices

Appendix A: 2020 January investment mapping to pool

Appendix B: LGPSC Product Dev Protocol v1.1 Dec 2019

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Leicestershire County Council Pension Fund - Local Pensions Committee January 2020

Investment Mapping to LGPS Central Pool

Introduction

Since Committee's last review of strategy in January 2019, the Leicestershire County Council Pension Fund ('the Fund') has:

- Transferred its active listed global and emerging markets equities to LGPS Central ('Central')'s equivalent products, and
- Entered into an agreement with Central to provide advisory services for some asset classes. Central undertakes a quarterly review of these mandates and they are monitored regularly by Central's Chief Investment Officer/Risk team.

The assets of the Fund which are currently managed/ advised by Central, or passively managed i.e. deemed to be 'pooled', are as follows:

Asset Class	Asset Class	% of Fund [1]		
		Central Investment Services	Central Advisory Services	Passive (by LGIM)
Equities	Global Equities (Active)	8%		
Equities	Global Emerging Markets Equities (Active)	4%		
Equities	Global Equities (Passive & Factor Based)			33%
Equity	Private Equity	[Note 2]		
Real Assets	Property		9%	
Alternatives	Targeted Return		12%	
Alternatives	Emerging Market Debt		3%	
TOTAL		12%	24%	33%
TOTAL		69%		

[1] At 30 September 2019, Source: Portfolio Evaluation.

[2] £10million committed.

During the year, LGPS Central have developed a more formal approach to product development which breaks the process into nine steps. The new process was developed to improve accountability and delivery by improving communication, clarifying responsibility between LGPS Central and partner funds, highlighting key decision-making stages and ensuring appropriate consultation. The protocol and status of the products being developed is attached to this document.

Also attached to this document is a table which shows the assets pooled (including those under Central's advice but excluding passive investments) for each of Central's partner funds. The proportion of partner funds which are deemed to be pooled ranges from 84% (West Midlands) to 3% (Nottinghamshire).

This paper outlines the options and timetable for the Fund to potentially transfer further investments to Central. Due diligence on the funds/arrangements offered would need to be undertaken before investments are made, including the risks faced by Central's business.

Equities

Current allocations are outlined below:

Manager	Asset Class	% of Fund [1]
LGIM	UK (large cap exposure capped)	4
LGIM	UK market cap passive	3
LGIM	Regional market cap passive (ex UK)	17
LGIM	Factor based - RAFI (N America & Europe)	9
LGPS Central	Active Global Equities	8
LGPS Central	Active Emerging Markets	4
LGPS Central	Private Equity	<1 [Note 2]
Various others	Private Equity	5
Total	Equities	50
Total Pooled	Including LGIM passive	45
	Excluding LGIM passive	12

[1] At 30 September 2019, Source: Portfolio Evaluation.

[2] £10million committed, approximately 5% invested.

With the exception of the Fund's unlisted private equity, all the Fund's equity investments are now being managed by Central or by LGIM.

Central launched a private equity product in 2018/2019 and the Fund invested £10m. However, the Private Equity Investment Director left LGPS Central and as a result, no product was launched for 2019/2020. Therefore, in October 2019 the Fund's Investment Sub-Committee agreed to commit approximately £30m to the Adams Street 2019 Global private equity fund. Over a period of up to 10-15 years, private equity investments will be returned to the Fund.

Other equity products managed by Central are as follows:

- Market cap passive mandates for partner funds which were previously managed in-house. They do not intend to develop these for wider use.
- A 'dividend growth' themed portfolio for West Midlands Pension Fund.
- A recently launched 'factor based' fund equity investing which includes carbon-related factors. Central manage this fund on a passive basis against an index provided by FTSE. The investment case for this product as an alternative to the RAFI funds managed by LGIM is covered elsewhere on Committee's agenda. Further due diligence is required, particularly clarifying the permissions to change the index against which the fund is managed.

Real Income Assets

Current allocations are outlined below:

Manager	Asset Class	% of Fund [1]	
Kames	Index linked gilts	8	8
IFM	Infrastructure	2	5
KKR		1	
JPM		2	
Stafford	Timberland	3	3
Aviva	Property – fund of funds	4	9
Kames	Property – indirect (smaller lots)	2	
Colliers	Property - direct and indirect	3	
TOTAL	Real Income Assets	25	25

[1] At 30 September 2019, Source: Portfolio Evaluation.

Index linked

- While Central's plans do not include an index-linked gilt bond fund, they do manage listed bonds under bespoke arrangement for other pension funds.
- Kames currently manage this mandate with a low performance target (+0.3%p.a.) and active risk compared the market index.

Infrastructure

- The Fund's existing infrastructure assets is approximately 5%. KKR infrastructure funds are closed-end (i.e. limited life) where capital will be returned over a period of up to 10-15 years. The JPM and IFM infrastructure funds are an open-ended (i.e. unlimited life) fund. Undrawn commitments to these managers are now less than 1% of the Fund.
- Despite extensive discussions between partner funds and Central regarding a potential infrastructure fund, there is limited appetite. Most partner funds appear to be focussing on the potential for Central to provide advisory services on new (and potentially existing infrastructure opportunities) where each partner fund would receive due diligence on potential investments and make their own decisions on whether to invest. Investments would be in the name of individual partner funds. Central hope that the advisory services will build sufficient confidence in their capabilities and appetite for partner funds to commit to an infrastructure fund in the future.
- Under the advisory arrangement, partner funds retain control over specific investments but would need to be sufficiently knowledgeable and resourced for (sometimes quick) decision making and the resulting administration/legal issues. From an investment perspective, the arrangement is sub-optimal primarily due to the uncertainty on investment execution and hence ability to negotiate with investment managers. Central may need additional resource depending on the commonality of partners' requirements.
- Leicestershire has continued to express interest in an infrastructure fund managed by Central and discussions are continuing. The potential commitment from the Fund

is not sufficient in itself, but it is understood that another partner fund may still be interested and the launch may be expected in Q3 2020.

Timberland

- The Fund has a relatively small amount of undrawn commitments to Timberland funds. They are closed-ended funds and hence investments will be returned to the Fund in due course and the allocation will reduce in due course.
- Central has no plans to launch a timberland fund.

Property

- Central currently provide advisory service for the Fund's property mandates. Approximately £100m is invested in direct properties (managed by Colliers) and the remaining in indirect holdings which are managed by three different managers.
- The Aviva mandate is the largest and currently consists of up to 20 property funds. The majority are invested in open-ended funds (i.e. with unlimited life), with the remainder in specialist funds which are typically closed-ended.
- The Fund's direct portfolio of £100m is considered to be sub-optimal in size and the indirect funds are more expensive, given the additional fee charged by Aviva.
- Over recent months Central has been liaising with partner funds to consider options for property management. With the exception of Shropshire and Worcestershire, all partner funds have sizeable direct property portfolios totalling £2.6bn. While there is limited interest in a UK direct property fund from the partners funds who already have direct holdings, there appears be sufficient appetite to make such a fund viable and Leicestershire has expressed interest. Central hope to launch this fund in Q4 2019. Discussions are ongoing regarding indirect property funds, potentially including overseas, niche areas of the UK and/or housing. Potential options to transfer some of the Fund's existing assets to Central funds would need to be considered in due course.

Alternative Investments

The Fund's current investments are outlined below:

Manager	Asset Class	% of Fund [1]	
Ruffer	Targeted Return	4	12
Aspect		3	
Pictet		4	
Millennium	Currency Overlay	-	-
Ashmore	Opportunities – Emerging Market Debt	3	9
JPMorgan	Opportunities - Credit	1	
Partners	Opportunities – Private Credit	5	
M&G	Opportunities – Other	2	3
CRC	Opportunities – Other	1	
InfraCap	Opportunities – Other	<1	
Standard Life	Opportunities – Other	<1	
TOTAL	Alternative Investments	24	24

[1] At 30 September 2019, Source: Portfolio Evaluation.

LGPS Central's plans to launch products are as follows:

- Progress has been made in agreeing the objectives of an actively managed **Emerging Market Debt** fund and a search for 1 to 3 external manager(s) has started. The number of managers will be determined as the search progresses. It is hoped the fund will launch early summer 2020.
- Plans to develop a **Multi Asset Credit** fund are in their early stages. There appears to sufficient interest from partner funds and the launch would be expected to be in Q4 2020.
- Discussions on the possibility of a **Targeted Return** fund are ongoing, focusing on partner funds' required risk and return expectations, whether they are achievable and whether there is consensus from partner funds. Central's analysis has shown that a return of CPI + 3% with risk equivalent to 50% of equities may be achievable. Central are awaiting feedback and agreement from partner funds to decide on whether to progress. Leicestershire could be the largest investor in this fund, alongside only one other partner fund and the viability of this Targeted Return fund is potentially in question. Hence it is important for Committee to give Central a clear steer of its appetite and requirements.
- Central are in the final stages of launching a **Corporate Bond** fund.
- In the absence of any **Private Credit** products from Central, Investment Sub-Committee agreed to commit £100m to the Partners Group Fund V in October 2019.

Other Assets – Currency Hedge

The Fund currently has a currency hedge, implemented by Kames, where Committee decide on the currencies to be hedged and the size of the hedge. Kames overlays active views on those currencies. While Central do not have a currency overlay product, they have the ability to provide an advisory and execution service and they are keen to discuss options with Leicestershire.



Conclusion

Leicestershire's active listed equity holdings were transferred to the equivalent Central products during 2019. Progress on developing other products is taking longer than originally anticipated, partly because they involve more complex asset classes and also because gaining consensus from the partner funds on their requirements has been more difficult.

It is likely to be many years before the majority of the Fund is transferred to LGPS Central. This is partly due to the Fund's unlisted and illiquid investments as well as the time taken by Central to develop investment options.

Potential options for further pooling of Leicestershire's assets in 2020 are currently as follows:

- A recently launched factor-based equity fund managed by Central to replace those currently managed against RAFI indices by LGIM.
- Emerging Markets Debt and Multi-Asset credit products should be available from Central in Q3 and Q4 2020 respectively. These could be potential replacements for the Ashmore and JP Morgan mandates respectively.
- An infrastructure fund could be launched in Q3 2020 for new commitments. An alternative advisory service is being offered by Central, whereby each fund retains decision making rights for each individual investment.
- A UK direct property fund is expected to be available in Q4 2020. The potential to transfer some of the Fund's existing assets would need to be considered in due course.

The Fund's strategic allocation to Targeted Return and risk/return expectations are crucial to Central's plans to develop such a product, potentially launching in Q1 2021. Leicestershire's could be the largest investor in this fund, alongside only one other partner fund.

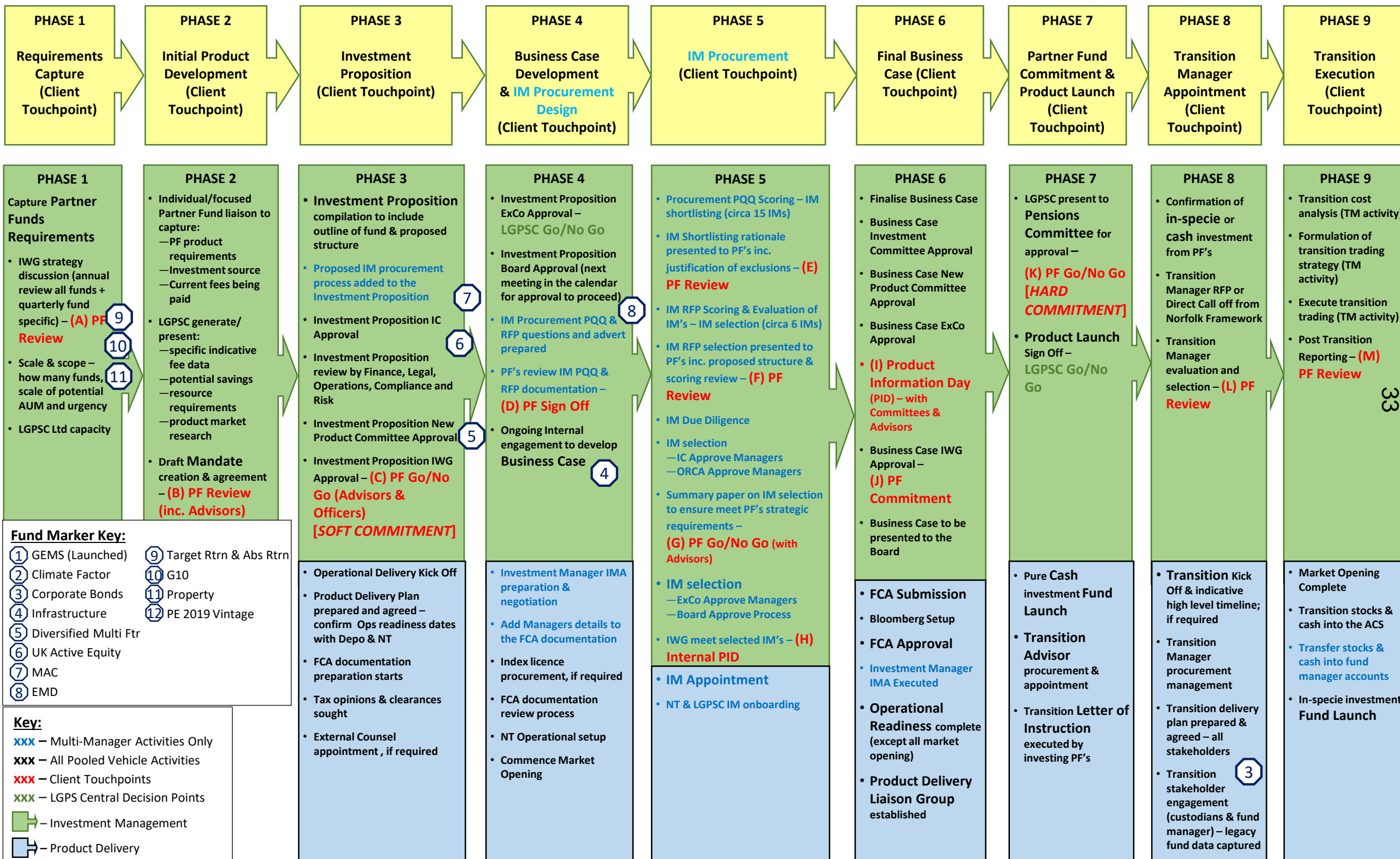
Clare Scott
January 2020

Attachments:

- 1. LGPS Centrals' Product Development Protocol as at December 2019
- 2 Assets pooled (excluding passive investments) by Central's partner funds

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PRODUCT DEVELOPMENT PROTOCOL



Client Touchpoints

Phase	Ref	Client Touchpoint	Purpose
1	A	IWG Strategy – PF Review	IWG Meeting - Officers review and discuss their specific requirements and strategy and how they align to the proposal
2	B	Draft Mandate – PF Review (inc. Advisors)	Officers & Advisors review the draft mandate and confirm agreement to the proposal
3	C	Investment Proposition IWG Approval – PF Go/No Go (Advisors & Officers) [SOFT COMMITMENT]	IWG Meeting – Officers & Advisors with interest and who accept the proposition confirm at IWG, confirm soft commitment to invest in the fund and progress continues through to Phase 4
4	D	External IM PQQ & RFP documentation PF Review – PF Sign Off	Officers review the proposed PQQ & RFP documentation and provide feedback for LGPSC to consider - sign off required
5	E	IM shortlisting rationale – PF Review	Officers are issued the shortlisting rationale for the IM's and justification of exclusions; all feedback reviewed
5	F	IM RFP selection inc. proposed structure & scoring	Officers are issued details of the IM's selected from the RFP including a review of the scoring and the proposed structure
5	G	IM selection meet PF's strategic requirements – PF Go/No Go	Officers & Advisors review summary paper on the IM selection and confirm if they are happy to proceed with investing in the fund and their strategic requirements can be achieved
5	H	IWG meet the selected IM's – Internal PID	IWG Meeting – Officers meet the selected IM's following presentation from each IM
6	I	Product Information Day (PID) – Officers & Advisors	PID – Presentation by LGPSC & IM's
6	J	Business Case IWG Approval – PF Commitment	IWG Meeting – Officers provide confirmation of their recommendation to invest, when they go to Pension Committee
7	K	LGPSC present to Pension Committee – PF Go/No Go [HARD COMMITMENT]	Pension Committee – LGPSC assist in presentation to the Pension Committee to seek approval & commitment to invest in the fund
8	L	Transition Manager evaluation & selection – PF Review	PDLG Meetings – Review of RFP or Call off criteria, later followed by evaluation to enable selection of a Transition Manager
9	M	Post Transition Reporting – PF Review	Post Transition Review Meeting – Review of the finalised report generated by the Transition Manager, following completion of the transition

Phase Outputs

Phase	Outputs
1	Partner Fund Requirements
2	Mandate
3	Investment Proposition – Soft Commitment
4	IM PQQ & RFP Documentation
5	IM Selection & Appointment
6	Product Information Day Business Case FCA Submission & Approval Operational Readiness Product Delivery Liaison Group
7	Pensions Committee Approval – Hard commitment Product Launch Sign Off Cash Investment Fund Launch Transition Advisors Transition Letter of Instruction
8	Transition Manager Selected & Appointed
9	Transition Cost Analysis Market Opening Transition Execution In-specie Investment Fund Launch

By virtue of paragraph(s) 3, 10 of Part 1 of Schedule 12A of the Local Government Act 1972.

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