

## Delegation of Functions to Officers by Pension Fund Committee – August 2022 **February 2023**

**Key:**

PFC – Pension Fund Committee

PAP - Pension Advisory Panel

HCPF – Head of Clwyd Pension Fund

CFM – Corporate Finance Manager

CMHR - Corporate Manager – Human Resources and Organisational Development

PAM – Pensions Administration Manager

DHCPF – Deputy Head of Clwyd Pension Fund

IC – Investment Consultant

FA – Fund Actuary

IA – Independent Advisor

Updates since last version are shown in **highlighted bold and italics**.

Function delegated to PFC	Further Delegation to Officer(s)	Delegated Officer(s)	Communication and Monitoring of Use of Delegation
<p>Investment strategy - approving the Fund's, Investment Strategy Statement including setting the Responsible Investment Policy and investment targets and ensuring these are aligned with the Fund's specific liability profile and risk appetite.</p> <p>Monitoring the implementation of these policies and strategies on an ongoing basis.</p>	<p>Rebalancing and cash management</p> <p>Implementation of strategic allocation including use of both rebalancing and conditional ranges</p> <p>Short term tactical decisions relating to the 'best ideas' portfolio</p> <p>Risk Management Framework - Implementation of the agreed <b>Risk Management</b></p>	<p>HCPF (having regard to ongoing advice of the IC and PAP)</p>	<p>High level monitoring at PFC with more detailed monitoring by PAP</p>

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	<p><b>Framework</b></p> <ul style="list-style-type: none"> <li>- market Flightpath triggers and</li> <li>- <b>Setting of inflation and interest rate triggers and</b> deciding action(s) to be taken when <b>those Flightpath funding</b> triggers are reached within the existing constraints of the Investment Strategy <b>(excluding 110% funding level trigger).</b></li> </ul>		
	Risk Management Framework - Agreeing actions to be taken on 110% funding level trigger	HCPF following the process as outlined in the Appendix	The process as outlined in the Appendix
	Investment into new mandates / emerging opportunities	HCPF and either the CFM or CMHR (having regard to ongoing advice of the IC)	High level monitoring at PFC with more detailed monitoring by PAP
	Completion and submission of request to opt up to professional client status under the terms of MIFID II	HCPF	Ongoing reporting to PFC for noting, with more detailed monitoring by PAP
<p>In relation to Wales Pooling Collaboration arrangements:</p> <ul style="list-style-type: none"> <li>• Nominating Flintshire County Council's officers to the Officer Working Group.</li> </ul>	To be the CPF designated members of the Officer Working Group	HCPF and DHCPF	High level monitoring at PFC with more detailed monitoring by PAP

Function delegated to PFC	Further Delegation to Officer(s)	Delegated Officer(s)	Communication and Monitoring of Use of Delegation
In relation to Wales Pooling Collaboration arrangements: <ul style="list-style-type: none"> <li>Delegating powers to Flintshire County Council's own officers and the Host Council where required.</li> </ul>	All matters included in the Inter Authority Agreement as being responsibilities of officers and the Host Council	Officers – HCPF who may delegate to DHCPF subject to ongoing advice from CFM  Host Council – Carmarthenshire County Council	High level monitoring at PFC with more detailed monitoring by PAP
Selection, appointment and dismissal of the Fund's advisers, including actuary, benefits consultants, investment consultants, global custodian, fund managers, lawyers, pension funds administrator, and independent professional advisers.	Ongoing monitoring of Fund Managers	HCPF and either the CFM or CMHR (having regard to ongoing advice of the IC) and subject to ratification by PFC	High level monitoring at PFC with more detailed monitoring by PAP
	Selection, appointment and dismissal of Fund Managers	HCPF and either the CFM or CMHR (having regard to ongoing advice of the IC) and subject to ratification by PFC	Notified to PFC via ratification process.
	Setting of objectives for investment related consultancy contracts in line with CMA requirements <sup>1</sup> , and monitoring against those objectives.	HCPF and DHCPF	High level information provided to PFC following annual review.

<sup>1</sup> In accordance with Investment Consultancy and Fiduciary Management Market Investigation Order 2019

Function delegated to PFC	Further Delegation to Officer(s)	Delegated Officer(s)	Communication and Monitoring of Use of Delegation
<p>Agreeing the terms and payment of bulk transfers into and out of the Fund.</p>	<p>Agreeing the terms and payment of bulk transfers into and out of the Fund where there is a bulk transfer of staff from the Fund. Exceptions to this would be where there is a dispute over the transfer amount or it relates to significant assets transfers relating to one employer or the Fund as a whole</p>	<p>HCPF and either the CFM or CMHR after taking appropriate advice from the FA.</p>	<p>Ongoing reporting to PFC for noting</p>
<p>Making decisions relating to employers joining and leaving the Fund. This includes which employers are entitled to join the Fund, any requirements relating to their entry, ongoing monitoring and the basis for leaving the Fund.</p>	<p>Making decisions relating to employers joining and leaving the Fund and compliance with the Regulations and policies. This includes which employers are entitled to join the Fund, any requirements relating to their entry, ongoing monitoring and the basis for leaving the Fund including flexibility of exit payments and deferred debt arrangements<sup>2</sup>.</p>	<p>HCPF and either the CFM or CMHR after taking appropriate advice from the FA.</p>	<p>Ongoing reporting to PFC for noting</p>

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<sup>2</sup> Note that any employer appeals to decisions made by officers relating to flexibility of exit payments and deferred debt arrangements are to be decided by the Pension Fund Committee.

Function delegated to PFC	Further Delegation to Officer(s)	Delegated Officer(s)	Communication and Monitoring of Use of Delegation
<p>Funding Strategy – approving the Fund's Funding Strategy Statement including ongoing monitoring and management of the liabilities, ensuring appropriate funding plans are in place for all employers in the Fund, overseeing the triennial valuation and interim valuations, and working with the actuary in determining the appropriate level of employer contributions for each employer.</p>	<p>Working with the actuary in determining the appropriate level of employer contributions for each employer between formal actuarial valuations<sup>3</sup></p>	<p>HCPF and either the CFM or CMHR after taking appropriate advice from the FA.</p>	<p>Ongoing reporting to PFC for noting</p>
<p>Discretions – determining how the various administering authority discretions are operated for the Fund.</p>	<p>Approving administering authority discretions policy (including the Voluntary Scheme Pays Policy and Over/underpayments Policy) other than in relation to:</p> <ul style="list-style-type: none"> <li>• any key strategy/policies and</li> <li>• matters relating to admission bodies and bulk transfers as included in the preceding two rows.</li> </ul>	<p>HCPF and either CFM or CMHR (having regard to the advice of the rest of the PAP)</p>	<p>Copy of policies to be circulated to PFC members once approved.</p>

<sup>3</sup> Note that any employer appeals to decisions made by officers relating to the rate of contributions between valuations are to be decided by the Pension Fund Committee.

<b>Function delegated to PFC</b>	<b>Further Delegation to Officer(s)</b>	<b>Delegated Officer(s)</b>	<b>Communication and Monitoring of Use of Delegation</b>
Agreeing the Administering Authority responses to consultations on LGPS matters and other matters where they may impact on the Fund or its stakeholders.	Agreeing the Administering Authority responses where the consultation timescale does not provide sufficient time for a draft response to be approved by PFC.	HCPF and either the CFM or CMHR , subject to agreement with Chair and Vice Chair (or either, if only one available in timescale)	PFC advised of consultation via e-mail (if not already raised previously at PFC) to provide opportunity for other views to be fed in. Copy of consultation response provided at following PFC for noting.
Agreeing the Fund's Knowledge and Skills Policy for all Pension Fund Committee members and for all officers of the Fund, including determining the Fund's knowledge and skills framework, identifying training requirements, developing training plans and monitoring compliance with the policy.	Implementation of the requirements of the CIPFA Code of Practice <sup>4</sup>	HCPF	Regular reports provided to PFC and included in Annual Report and Accounts.
Determining the Pension Fund's aims and objectives, strategies, statutory compliance statements, policies and procedures for the overall management of the Fund	Making minor changes to existing strategies, statutory compliance statements, policies and procedures. These will still be required to be considered by the PFC in line with the period stated in that document.	HCPF and either the CFM or CMHR	Ongoing reporting to PFC for noting

<sup>4</sup> CIPFA Code of Practice recommends each administering authority delegates responsibility for implementation to a senior officer.

Function delegated to PFC	Further Delegation to Officer(s)	Delegated Officer(s)	Communication and Monitoring of Use of Delegation
	Personal Data Retention Policy -	PAM in consultation with HCPF	Ongoing reporting to PFC for noting  Fundamental changes to this Policy will be highlighted to the Pension Fund Committee prior to its approval to allow the Committee to highlight any concerns.
	Policy for Administration and Communication of Tax Allowances to Scheme Members -	PAM in consultation with HCPF	Ongoing reporting to PFC for noting  Fundamental changes to this Policy will be highlighted to the Pension Fund Committee prior to its approval to allow the Committee to highlight any concerns.
The Committee may delegate a limited range of its functions to one or more officers of the Authority. The Pension Fund Committee will be responsible for outlining expectations in relation to reporting progress of delegated functions back to the Pension Fund Committee.	Other urgent matters as they arise	HCPF and either CFM or CMHR , subject to agreement with Chair and Vice Chair (or either, if only one is available in timescale)	PFC advised of need for delegation via e-mail as soon as the delegation is necessary. Result of delegation to be reported for noting to following PFC.
	Other non-urgent matters as they arise	Decided on a case by case basis	As agreed at PFC and subject to monitoring agreed at that time.

### Process for the actions to be taken following a breach of the 110% funding level trigger<sup>5</sup>

The funding level be monitored daily using projected asset and liability values from the PFareo platform. On breaching the 110% funding level, a notification will be sent to the Funding and Risk Management Group (FRMG) via email on that or the following Business Day;

- Mercer will then independently verify the asset and liability values over the following 10 Business Days (the length of this period reflects the timeframe to receive updated data from the Fund's investment managers) to confirm that the 110% trigger has indeed been breached;
- Mercer will conduct analysis of the funding position assuming that the trigger has been breached, and will circulate an advice note to the FRMG no later than 20 Business Days from the initial trigger notification;
- The FRMG will hold a call within 25 Business Days of the trigger notification to discuss the advice note and any recommendation made by the Fund's advisers to the FRMG.
- The Head of Clwyd Pension Fund will then consider the advice received relating to de-risking, and will report via email their intended decision on this matter to the Pension Fund Committee;
- The Committee will be invited to provide feedback over the following 5 Business Days and:
  - If, after receiving any comments, there are no outstanding issues for discussion (including where no comments have been received from the Committee) regarding the Head of Clwyd Pension Fund's proposed decision, if the decision is to de-risk, the FRMG will liaise with investment managers to agree documentation and instructions in line with the agreed actions within 35 Business Days from the initial trigger notification.
  - However, if there are any issues highlighted by PFC members that require discussion, a special Committee meeting will be called to consider the issues and at that meeting the Committee will be asked whether or not to endorse the Head of Clwyd Pension Fund's intended way forward (noting that this meeting will need to be scheduled as a matter of urgency).

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<sup>5</sup> Agreed at 9 February 2022 Pension Fund Committee

- Following a decision to go ahead with the de-risking actions, the FRMG will work with investment managers to implement the agreed de-risking activity, which will then be reported to Committee at the next regular meeting.