

WIRRAL COUNCIL

PENSION BOARD

DATE 12 NOVEMBER 2019

SUBJECT:	COMPLIANCE MANUAL
REPORT OF:	DIRECTOR OF PENSIONS

1.0 EXECUTIVE SUMMARY

- 1.1 This report provides Board members with details of a revision to Section 5 of the Compliance Manual for which approval was sought at Pensions Committee on 4 November 2019.
- 1.2 The appendix to this report contains exempt information. This is by virtue of paragraph(s) 3 of Part 1 of Schedule 12A of Local Government Act 1972 i.e. information relating to the financial or business affairs of any particular person (including the authority holding that information).

2.0 BACKGROUND AND KEY ISSUES

- 2.1 The Compliance Manual sets out the powers, duties and responsibilities of officers in respect of the financial services legislative and regulatory regimes relevant to MPF. Although the Pension Fund is not regulated by the Financial Conduct Authority (FCA) the manual incorporates, where appropriate, best practice as set out by the FCA and the codes of other professional bodies.
- 2.2 The manual is subject to a review as required, but at least every three years. The existing Compliance Manual was approved at Pensions Committee 22 January 2018.
- 2.3.1 The revised Section 5 of the Compliance Manual is attached as Appendix 1 to this report.
- 2.3.2 The main changes to the manual are the updates required to reflect the new internally managed internal factor portfolio (IFP). Changes to the manual include:

Reference	Change
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5.3	Investment Philosophies moved from Section 5 to appendices.
5.4	New section on general principles
5.5	New section on primary responsibilities
5.6	New section on investment fees and costs
5.7	New section on due diligence
5.8	Dealing section updated to reflect IFP.
5.8.2	New section on capital calls
5.9	Reviewed and updated Investment Committee section to reflect roles and responsibilities.
5.10	Updated section on requirement to obtain bank details.

3.0 RESOURCE IMPLICATIONS: FINANCIAL; IT; STAFFING; AND ASSETS

3.1 There are none arising from this report.

4.0 RECOMMENDATION

4.1 That Board Members note the report.

5.0 REASON/S FOR RECOMMENDATION/S

5.1 There is a requirement for Members of the Pension Board to be kept informed of changes to pension fund policies and procedures as a part of their role in supporting the administering authority.

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SUBJECT HISTORY

Council Meeting	Date
Pensions Committee	22 January 2018
Pensions Committee	21 March 2017

APPENDICES:

Compliance Manual Report.

EXEMPT APPENDIX Revised Section of the Compliance Manual and Investment Philosophies.