



HILLINGDON  
LONDON

# London Borough of Hillingdon Pension Fund

## Equality, Diversity and Inclusion Policy 2025

Approved March 2025

## 1. Introduction

The London Borough of Hillingdon Pension Fund (the Fund) is committed to ensuring that the Hillingdon Pension Scheme is governed efficiently and effectively and understands that a core component of this is following best practice in terms of Equality, Diversity and Inclusion (EDI).

The Fund's Board and Committee understand that diversity in its membership and support functions is fundamental to making well-rounded and more effective decisions.

This policy takes into account the guidance outlined by The Pensions Regulator [Governing body guidance | The Pensions Regulator](#).

## 2. Definitions

It is important that EDI is defined and communicated to ensure a shared understanding of its meaning.

### Equality

According to the Equality and Human Rights Commission, "Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents."

### Equity

Equity is the quality of being fair and impartial, acknowledging that people have individual needs.

### Diversity

Diversity in its broadest sense can mean any aspect that differentiates groups and individuals from each other. This includes characteristics such as age, disability, ethnicity, sexual orientation and religious beliefs.

### Inclusion

Inclusion means creating a culture or environment where everyone feels effectively involved, valued and supported.

### 3. Objectives

The aim of this policy is to

- Provide equality, fairness and respect for scheme members, staff, the Pension Board and Pension Committee members.
- To ensure no unlawful discrimination due to protected characteristics (Equality Act 2010) or other socio-economic factors.

### 4. Scope

This policy covers 5 key areas as follows:

- Members
- Board and Committee
- Support Functions
- Scheme Advisors
- Investing

### 5. Members

Reflecting the diverse needs and beliefs of our members is important in delivering a high-quality service and an excellent member experience. Ensuring the Fund's systems and processes do not exclude or discriminate against members including, but not limited to how the Fund communicates with members, the services that are available and how these are provided.

We acknowledge that our approach needs to be agile to respond to the changing needs of our members.

The Fund aims to develop systems and processes that will collect and monitor data about its members to understand the workforce composition across different diversity characteristics, and the effectiveness of this policy.

### 6. Board and Committee

We believe that having a diverse Board and Committee is fundamental to making well-rounded and more effective decisions.

We aim to recruit and develop individuals with diverse skills and backgrounds to contribute to the oversight of the Pension Fund. Where possible we will make reasonable adjustments to ensure those individuals can contribute e.g. the time, format or venue of meetings. We aim to create an inclusive culture, ensuring all are effectively involved, valued and supported and seek to ensure that both the Board

and Committee benefits from its diversity by having a safe environment in which to share and discuss different views.

Board and Committee members will be expected to undertake training on EDI on appointment and from time to time thereafter.

## 7. Support Functions

### Hillingdon Council

Hillingdon Council is responsible for managing the Fund as the statutory Administering Authority. The Fund's Board and Committee are supported by Hillingdon Council staff. Hillingdon Council's EDI policy outlines its commitment to encouraging equality, diversity and inclusion among its workforce, and eliminating unlawful discrimination. This means that all employees, job applicants and others who work for the council will be treated fairly. The council's aim is for their workforce to be representative of all sections of society and Hillingdon residents, and for each employee to feel respected, able to give their best, and be themselves at work.

A copy of the council's EDI Policy can be found here. [Our commitment - Hillingdon Council](#) (Policy available on demand)

### Hampshire County Council

The Fund has entered into a shared services agreement with Hampshire County Council who provide the administration services to the Fund. The majority of pension administration staff are thus employed by Hampshire Council, and subject to Hampshire's EDI policy.

A copy of Hampshire council's EDI Policy can be found here. [Equality | About the Council | Hampshire County Council](#)

## 8. Scheme Advisors

The Fund uses a number of advisors including, but not limited to, Actuaries, investment consultants, auditors. The Fund recognises that the pension advisers provide advice and guidance upon which the Board and Committee make decisions.

It is therefore important that the Board and Committee are made aware of the advisers' commitment and ambitions around equality, diversity and inclusion, both on appointment and regularly thereafter.

## 9. Investing

The Fund will act in the best financial interests of its members. The Fund aims to maximise the total investment return within an acceptable level of risk, and considers all financial risks within its investment strategy, as well as pursuing a Responsible Investment Policy. Responsible Investment considers a number of risks and opportunities including Environmental, Social and Corporate Governance (ESG) factors. Social considerations include, among other factors, diversity, opportunities for women and those with disabilities or from minority communities employee rights, charitable activities, community work, use of agency workers and social infrastructure.

### London CIV, Northern Trust and External Investment Managers

The Fund delegates day to day investment matters to its pool, the London CIV (of which it is a shareholder) and to a number of external investment managers. The Fund uses Northern Trust as its global custodian.

It is therefore important that the Board and Committee are made aware of these organisations commitment and ambitions around equality, diversity and inclusion, both on appointment and regularly thereafter. This requirement applies to both the pool and the investment managers own businesses but also to how they approach the subject of EDI when considering underlying investments.

## 10. Training

A learning session on the principles of EDI and why it is important for the Fund will be delivered to members of the Board and Committee when this policy is implemented and further sessions such as understanding bias and privilege, the principles of the Equality Act 2010 and inclusive recruitment practices will be delivered from time to time.

### 11. Review of this Policy

We will review this policy on a regular basis, and at least every three years, and make changes to reflect best practice.

Next Review date March 2028.

## Appendix A

### Action plan – Systems and Process

The following high-level plan is based around the 5 key areas of the policy.

<b>Members</b>			
<b>Objective</b>	<b>Action</b>	<b>Date</b>	<b>Responsible person</b>
To ensure that the Fund communicates inclusively and equitably with its members.	Develop a communications strategy that takes language, accessibility and engagement into account for all members.	Triennial Review (Due Sept 2027)	Finance Manager, Pensions & Governance
	Review communication methods on an annual basis to ensure they are inclusive and equitable.	Annually	Finance Manager, Pensions & Governance
To improve the financial confidence of the Fund members.	Implement financial education for employees and members to encourage conversations about pensions and their wider finances.	Ongoing	Hampshire Pension Services
To understand the demographics of members and improve pension gaps.	Collect and analyse the equality data of its members including pension gap.	Annually	Finance Manager, Pensions & Governance/Hampshire Pension Services
	Implement actions to address pension gaps.	Ongoing	Finance Manager, Pensions & Governance/Hampshire Pension Services

<b>Objective</b>	<b>Action</b>	<b>Date</b>	<b>Responsible person</b>
<b>Board and Committee</b>			
To ensure the Fund's Board and Committee reflect the diversity of its members.	Review the diversity of the Board and Committee membership and implement positive action in recruitment measures where appropriate.	Annually	Finance Manager, Pensions & Governance/Democratic Services
To ensure that members of the Board and Committee are recruited in a fair and equitable manner.	All members of the Board and Committee receive training to reduce bias in the recruitment process.	Within six months of appointment and annually thereafter.	Finance Manager, Pensions & Governance/Democratic Services
<b>Support Functions</b>			
The ensure that the host authority is meeting its EDI obligations.	<p>Review Hillingdon's EDI Policy</p> <p>An EDI update is requested from the council on an annual basis.</p> <p>Request changes if it is believed Hillingdon are not following best practice.</p>	<p>At least triennially</p> <p>Annually</p> <p>Ad-hoc</p>	Finance Manager, Pensions & Governance
The ensure that the shared service administrator is meeting its EDI obligations.	<p>Review Hampshire's EDI Policy</p> <p>An EDI update is requested from the council on an annual basis.</p>	<p>At least triennially</p> <p>Annually</p>	Finance Manager, Pensions & Governance

	Request changes if it is believed Hampshire are not following best practice.	Ad-hoc	
<b>Scheme Advisors</b>			
To ensure that the scheme advisors (including actuaries, auditors, investment consultants etc.) are meeting their EDI obligations.	Review the Fund advisers' EDI policies and action plans	On appointment and at least triennially thereafter	Finance Manager, Pensions & Governance
<b>Investing</b>			
To ensure that the Fund is investing responsibly and in line with its obligations.  Review the approach taken on EDI by the London CIV or an external manager prior to purchasing an underlying investment.  To ensure that the London CIV and external investment managers are meeting their own businesses EDI obligations.	Review the Fund's Responsible Investment Policy.  Review the LCIV's and external managers Responsible Investment policy/approach in respect of EDI.  Review the Fund advisers' EDI policies and action plans	Triennial Review (Due March 2026)  On appointment and at least triennially thereafter. Request an annual update of changes.  On appointment and at least triennially thereafter	Finance Manager, Pensions & Governance



## Next Steps

1. Perform a Gap Analysis
2. Develop detailed actions and checklists
3. Report progress
4. Develop ongoing monitoring

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