Department for Communities
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Northern Ireland Central Investment Fund for Charities

Statement of Investment Policy

October 2017

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1. Introduction

1.1 The purpose of this Investment Policy Statement is to establish best practice guidelines for the management of the Northern Ireland Central Investment Fund's investment portfolio (the "Fund"). The statement includes accountability standards that will be used for monitoring the progress of the Fund’s investment strategy and for evaluating the performance of the investment manager(s) contracted on behalf of the Fund and its stakeholders.

1.2 The Department, with advice from the Advisory Committee will review the Investment Policy Statement at least annually. Changes to the Investment Policy Statement will be communicated to the Investment Manager of the Fund as soon thereafter as is practical.

2. Role of the Department

2.1 The Department for Communities (“the Department”), advised as to investment policy by the Advisory Committee (hereinafter called “the Committee”) appointed under section 25(10) of the Charities (Northern Ireland) Act 1964, acts as Trustee of the Central Investment Fund for Charities.

3. Role of the Advisory Committee

3.1 The Committee is bound by the Charities (Northern Ireland) Act 1964, whereby it must advise the Department on financial policy and investment matters relating to the Fund.

3.2 The Committee’s main objective is to monitor the Investment Manager’s performance against the stated contractual requirements and advise the Department accordingly. Such advice being given at the quarterly meetings (February, May, August & November) or by e-mail or telephone, as and when required

3.3 Additional Duties include**:**

i. Considering and assessing the investment advice provided by the investment manager and stating its views thereon.
ii. Advising on dividend policy.
iii. Advising on the Dividend Equalisation Reserve.
iv. Advising generally on matters affecting the operation and management of the Fund to promote the best interests of the investors.

4. Role of the Investment Manager

4.1 The Department relies on a third party Investment Manager for the day to day management of the Fund's assets in line with this Investment Policy Statement. The Investment Manager is regulated by the Financial Conduct Authority and is responsible for the selection of individual stocks within each type of investment.

5. Investment Objectives

5.1 The primary objective of the Fund is to generate income and thereafter long-term capital growth in real terms. The recommended investment timeframe is 5 years and over. In terms of the income, the Fund aims to achieve an annual income return in excess of the benchmark yield.

6. Asset Allocation

6.1 The Department recognises that the strategic allocation of Fund assets across broadly defined financial asset and sub-asset categories with varying degrees of risk, return, and return correlation will be the most significant determinant of long-term investment returns and fund asset value stability.

6.2 The Department expects that actual returns and return volatility may vary from expectations and return objectives across short periods of time. While the Committee wishes to retain flexibility with respect to making periodic changes to the Fund's asset allocation, it expects to do so only in the event of material changes to the Fund, to the assumptions underlying established spending policies, and/or to the capital markets and asset classes in which the Fund invests.

6.3 Fund assets will be managed as a balanced portfolio composed of two major components: an equity portion and a fixed income portion. The expected role of Fund equity investments will be to maximize the long-term real growth of Fund assets, while the role of fixed income investments will be to generate current income, provide for more stable periodic returns and provide some protection against a prolonged decline in the market value of Fund equity investments.

6.4 Cash investments will, under normal circumstances, only be considered as temporary Fund holdings and will be used for Fund liquidity needs or to facilitate any planned programme of pound-cost averaging into investments in either or both of the equity and fixed income asset classes.

6.5 Outlined below are the long-term strategic asset allocation guidelines determined by the Department, with advice from the Committee, to be the most appropriate given the Fund's long-term objectives and short-term constraints. Fund assets will, under normal circumstances be allocated across broad asset and sub-asset classes in accordance with the following guidelines:

Asset Class	**Range (%)**
Fixed Interest *	15 - 35
UK Equities	35 – 65
Overseas Equities	15 – 35
Other/Cash	0 - 10

*Gilts, Corporate Bonds and Overseas Fixed Interest

7. Benchmark

7.1 The investment managers are responsible for the day-to-day management of the actual portfolio, but the Fund's investment policy is guided by the Charities Advisory Committee. Expected returns on equity investments held by the Fund are to match or exceed price inflation, whilst all asset classes are expected to contribute towards an increasing income. The performance of the Investment Manager is required to outperform the current benchmark (as noted below), measured over rolling three year periods, both in terms of income yield and capital growth. However, the benchmark may be varied from time to time at the discretion of the Department and in line with prevailing market conditions.

Asset Class	**%**	**Benchmark Index Comparator**
Fixed Interest	25*	FTSE Government All-Stocks Index
UK Equities	50	FTSE All Share Index
Overseas Equities	20	FTSE World (ex UK) Index
Other/Cash	5	7 day cash
	100	

*12.5% Gilts/12.5% Corporate Bonds

8. Investment Restrictions

8.1 The Department has specified a number of restrictions, which the Investment Manager must adhere to:

- No more than 5% of the portfolio to be invested in any single issue (excluding Government Gilts and AAA rated Corporate Bonds).
- No direct investment in tobacco related stocks.
- No investment in securities that are not readily realisable.
- No own company products without prior written approval.
- The Investment Manager will be responsible for the day-to-day management of the portfolio, but the Charities Advisory Committee shall provide guidance on investment strategy.
- Transactions shall not be subject to soft commission arrangements.

9. Risk Profile and Risk Mitigation

9.1 Based on the long term strategic asset allocation and its alignment to the current Investment Manager's risk definitions, the Fund adopts a 'medium high' risk approach to the overall portfolio of holdings. It is accepted that this may increase the risk of greater fluctuations (a medium high risk approach is quantified as a potential peak to trough fall of up to 30%) in the value of the investments but this is viewed in the context of the prospects for better long term returns.

9.2 Diversification across and within asset classes is the primary means by which the Department expects the Fund to avoid undue risk of large losses over long time periods. To protect the Fund against unfavourable outcomes within an asset class due to the assumption of large risks, the Investment Manager should take reasonable precautions to avoid excessive investment concentrations including but not limited to the individual stock, sector and geographical region.

9.3 Rebalancing is important in ensuring an appropriate mix of asset classes. It is expected that the Fund's actual asset allocation will vary from its target asset allocation as a result of the varying periodic returns earned on its investments in different asset and sub-asset classes. Furthermore, it is expected that the Investment Manager will rebalance on a regular basis so that the Fund is within its agreed asset allocation ranges. The investment manager shall act within a reasonable period of time to evaluate deviation from these ranges.

10. Distribution / Equalisation Policy

10.1 Paragraph 20(3) of the Charities Central Investment Fund Scheme (Northern Ireland) 1965 makes provision for the retention of such amount of income the Department thinks fit in a Dividend Equalisation Reserve (DER) in order to avoid or reduce fluctuations in the amounts distributed as dividends. The DER is held by the investment manager in an account separate from the main Fund. It is worth noting that the legislation states that contribution to the DER should not exceed 10% of the net income of each six-month period and that at no time should the balance in the DER exceed 2% of the capital value of the Fund. The distribution of Fund assets will be permitted to the extent that such distributions do not exceed a level that would erode the Fund's real assets over time. The Department will review its distribution assumptions annually, for the purposes of deciding whether any changes therein necessitate amending the Distribution Policy, its target asset allocation, or both.

11. Monitoring Portfolio Investments and Performance

11.1 The Committee will monitor the Fund's investment performance against its stated investment objectives, as outlined in Section 3. The Committee will formally assess the Fund and the performance of its underlying investments four times a year, as follows:

11.2 The Fund's composite investment performance (net of fees) will be judged against the following standards:

i. The Portfolio's absolute long-term real return objective.
ii. The composite benchmark outlined in section 7.
iii. The Committee will also consider peer group comparison, from time to time, if available.
iv. The income yield.

11.3 On behalf of the Department, the Committee will evaluate investment manager performance over a suitably long-term investment horizon, generally on a rolling three-year basis.

11.4 Investment reports shall be provided by the investment manager(s) on a (calendar) quarterly basis or more frequently as requested by the Committee. The investment manager(s) is expected to be available to meet with the Investment Committee at least once per year to review portfolio structure and strategy, in addition to the regular investment performance review meetings.

12. Socially Responsible Investing

12.1 The Department's overriding obligation is to fulfil its fiduciary responsibilities and act in the best interests of the Fund investors. In this fiduciary role, the Department believes that environmental, social and corporate governance (ESG) issues can affect the performance of investments. Accordingly, the Department believes that these factors should be taken into account when managing the Fund's assets, subject to the overriding fiduciary duty to maximise the financial return on investments.

12.2 The Fund currently has one long-standing ethical restriction in that there is to be no direct investment in tobacco production (i.e. exclusion of the tobacco sector) and no direct investment in companies that derive more than 10% of turnover from tobacco production

** Direct investment is defined as investing in an equity or bond directly rather than via a pooled fund. The term indirect investment applies to any holdings (equities or bonds) via a pooled fund.

12.3 All ethical restrictions are implemented on a best endeavours basis. If an existing holding is found to be unacceptable under the restrictions detailed, now or in the future, the investment manager will review the holding and if deemed appropriate, highlight the discrepancy to the Department, who may then consult the Committee on a suitable response to the matter.