



County Offices
Newland
Lincoln
LN1 1YL

8 July 2020

In accordance with the powers granted by the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 this will be a virtual meeting.

LGPS Local Pension Board

A meeting of the LGPS Local Pension Board will be held on **Thursday, 16 July 2020 at 2.00 pm as a Virtual - Online Meeting via Microsoft Teams** for the transaction of the business set out on the attached Agenda.

Access to the meeting is as follows:

Members of the LGPS Local Pension Board and officers of the County Council supporting the meeting will access the meeting via Microsoft Teams.

Members of the public and the press may access the meeting via the following link: <https://lincolnshire.moderngov.co.uk/ieListMeetings.aspx?CId=552&Year=0> where a live feed will be made available on the day of the meeting.

MEMBERS OF THE BOARD

Independent Chair (non-voting): Roger Buttery

Employer Representatives (voting): Councillor M A Whittington and Gerry Tawton

Scheme Member Representatives (voting): Kim Cammack and David Vickers

AGENDA

Item	Title	Pages	Estimated Time
1	Apologies for Absence		
2	Declarations of Interest		
3	Minutes of the previous meeting held on 9 January 2020	5 - 14	
4	Pension Fund Update Report <i>(To receive a report by Jo Ray (Head of Pensions), which provides an update on Fund matters over the quarter ending 31 March 2020 and any current issues)</i>	15 - 30	2.10 pm
5	Pension Administration Report <i>(To receive a report by Yunus Gajra (Business Development Manager (WYPF)), which updates on current administrative issues)</i>	31 - 54	2.25 pm
6	Data Scores <i>(To receive a report by Yunus Gajra (Business Development Manager (WYPF)), which updates on the Data Scores for Lincolnshire Pension Fund reported to The Pensions Regulator (TPR), as required under this year's TPR returns)</i>	55 - 68	2.40 pm
7	Temporary Bank Accounts <i>(To receive a report by Yunus Gajra (Business Development Manager (WYPF)), which updates on the number of temporary bank accounts created by WYPF to hold monies due to beneficiaries of the scheme)</i>	69 - 74	2.50 pm
8	Employer Monthly Submissions Update <i>(To receive a report by Claire Machej (Accounting, Investment and Governance Manager), which provides up-to-date information on Employer Monthly Submissions for the final quarter of the financial year 2019/20 (January to March))</i>	75 - 78	2.55 pm
9	Lincolnshire Pension Fund Risk Register <i>(To receive a report by Jo Ray (Head of Pensions), which presents the Pension Fund Risk Register, Risk Policy and Coronavirus Risk Register)</i>	79 - 92	3.00 pm
10	Pension Fund Draft Annual Report and Accounts <i>(To receive a report by Claire Machej (Accounting, Investment and Governance Manager), which presents the draft Annual Report and Accounts for the Pension Fund)</i>	93 - 290	3.10 pm

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| 11 | Pension Board Effectiveness Review
<i>(To receive a report by Jo Ray (Head of Pensions), which acts as a discussion document to review the effectiveness of the Board)</i> | 291 - 292 | 3.20 pm |
| 12 | Training Needs
<i>(To receive a report by Claire Machej (Accounting, Investment and Governance Manager), which invites the Board to discuss any training attended since the last meeting and to highlight any training needs)</i> | 293 - 300 | 3.35 pm |
| 13 | Work Programme
<i>(To receive a report by Claire Machej (Accounting, Investment and Governance Manager), which provides the Board with an opportunity to consider its work programme for the coming meetings)</i> | 301 - 450 | 3.45 pm |

Published on Wednesday, 8 July 2020

Should you have any queries on the arrangements for this meeting, please contact Cheryl Evans via telephone 07387 133755 or alternatively via email at cheryl.evans@lincolnshire.gov.uk

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LGPS LOCAL PENSION BOARD 9 JANUARY 2020

PRESENT:

Independent Chair: Roger Buttery

Employer Representatives: Councillor M A Whittington and Gerry Tawton

Scheme Member Representatives: Kim Cammack and David Vickers

Officers in attendance:-

Stuart Duncombe (Team Manager - Business Relations (West Yorkshire Pension Fund)), Cheryl Evans (Democratic Services Officer), Claire Machej (Accounting, Investment and Governance Manager) and Jo Ray (Head of Pensions)

30 APOLOGIES FOR ABSENCE

The Chairman wished the Board a Happy New Year.

There were no apologies for absence.

It was noted that Stuart Duncombe (Team Manager - Business Relations, West Yorkshire Pension Board) was attending the meeting on behalf of Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund).

The Chairman welcomed Stuart Duncombe (Team Manager - Business Relations, West Yorkshire Pension Board) to his first meeting of the Board.

31 DECLARATIONS OF INTEREST

Councillor M A Whittington declared that his wife was in receipt of a pension from the Fund.

Gerry Tawton declared that his wife was a deferred member of the Pension Fund.

32 MINUTES OF THE PREVIOUS MEETING HELD ON 3 OCTOBER 2019

RESOLVED

That the minutes of the meeting held on 3 October 2019 be approved as a correct record and signed by the Chairman.

33 PENSION FUND UPDATE REPORT

Consideration was given to a report by the Head of Pensions, which provided an update on Fund matters over the quarter ending 30 September 2019.

The Board was provided with updates on the following:

- Local Authority Pension Fund Forum Membership;
- The Pension Regulator (TPR) Checklist Dashboard;
- Breaches Register Update;
- Risk Register Update;
- Asset Pooling Update; and
- Good Governance Review.

The Board was advised that all members of the Pensions Committee, except the newly appointed member, had completed TPR Toolkit. It was advised that the new member would complete the Toolkit within the six month deadline.

The Fund had made its first investment with Border to Coast in October 2019, into the Global Equity Alpha Fund. The transition had been managed by Blackrock, and overseen by Inalytics. It was confirmed that generally the transition had gone very well, and Inalytics had provided an interim report stating it was satisfied with the transition work undertaken by Blackrock.

It was highlighted that the transition had incurred a higher than estimated implementation shortfall (a standard measure for transitions), as the target portfolio had significantly out-performed the legacy portfolio during the transition. To assist in the oversight of the governance in respect of the transition of assets to Border to Coast, the final transition report from Inalytics would be shared with the Board once it was available.

In response to a question, it was advised that Blackrock had been appointed by Border to Coast.

The next transition of assets Border to Coast was scheduled for early 2020 into the Investment Grade Credit Sub-Fund, and followed by Multi Asset Credit in the second half of 2020. An overview of both of the funds had been included in the Border to Coast presentation to the Pension Committee in December 2019.

It was highlighted that following on from Phase I of the Good Governance Review detailed at the July 2019 meeting of the Board, phase II had now been completed and the report had been published in November 2019, which was attached at Appendix C to the report. The Scheme Advisory Board had agreed to constitute two working groups (focusing on the Standards and Outcomes workstream; and the Compliance and Improvement workstream) to take forward the proposals included in the original report. Hymans Robertson had been appointed to assist the working groups in the next phase of the good governance project.

The phase II report had included detailed implementation proposals from the workstreams, which included a list of the changes required to guidance to implement the framework. A table summarising the proposed changes was detailed on pages 17-19 of the agenda pack. Specific reference was made to the size and make-up of pension committees and the training requirements.

In light of the two new members on the Board, it was suggested that a *training evaluation submission* be emailed to all members of the Board for completion, which would help identify any training needs, the results of which could then be discussed under the item *Training Needs* at the next scheduled meeting of the Board.

In response to a question it was confirmed that F5 on TPR's and Scheme Advisory Board Compliance Checklist was shaded in grey, as F5 was not relevant as there would be no decisions taken by the Board outside of its meetings.

RESOLVED

- (1) That the report be noted.
- (2) That a *training evaluation submission* be emailed to all members of the Board for completion to identify any training needs, the results of which would then be discussed under the item *Training Needs* at the next scheduled meeting of the Board.

34 PENSIONS ADMINISTRATION REPORT

Consideration was given to a report from the Team Manager - Business Relations, West Yorkshire Pension Fund, which provided an update on current administration issues within the Fund.

Members received an update on the following issues:

- Performance and Benchmarking;
- Scheme Information;
- Member and Employer Contact;
- Internal Disputes and Resolution Procedures;
- An Administration Update;
- Current Technical Issues; and
- Shared Service Budget.

It was advised that there was a typing error in section 3.0 of the report, and it should state: *Over the quarter July to September we received 2 online customer responses.*

The Board was invited to ask questions, to which the following responses were given:

- Annual Benefit Statements and Deferred Benefit Statements for 2018/19 had included new information on pension estimates for each member. This had

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led to a reduction in pension estimates enquiries and an increase in deferred pensions being put into payment.

- All Key performance indicators (KPIs) had been achieved in this quarter.
- It was requested that the table detailing membership numbers in the Lincolnshire Fund, page 45 refers, be updated to also include the number of new members; and how many of the total number of members were in the 50/50 part of the scheme.
- Reference was made to the section of the report concerning *Stages 1, 2 and ombudsman appeals against scheme employers* and it was agreed that the Board would be emailed an up-to-date position on each of the appeals, as the information contained within the report was for quarter 2, July to September 2019.
- Work had commenced on giving members the option to commute their 'trivial' pension to a one-off lump sum payment. Members who had a pension of under £500 per annum had been targeted in the first instance. 230 members fell into this category and an example of the letter sent to members was tabled at the meeting.
- Reference was made to the McCloud judgement and it was advised that the Local Government Associated had advised that the service history for each member would need to be in place. It was advised that Lincolnshire was in a good position, as service history was already in place for both part-time and full-time employees. However, it was noted that work would have to be undertaken on the service histories of casual workers.
- The cost per member had increased from £15.01 in 2018/19 to an estimated £16.11 for period 6 in 2019/20; however this was to be expected, with West Yorkshire investing in IT during 2019/20 and using the actuary to undertake a review of members' processes in the shared service. The Board recognised that this was good value for money, compared with other local government pension schemes.

RESOLVED

- (1) That the report be noted.
- (2) That future reports to the Board be revised to include: the table detailing membership numbers in the Lincolnshire Fund be updated to also include the number of new members; and how many of the total number of members were in the 50/50 part of the scheme.
- (3) That updated information on the *Stages 1, 2 and ombudsman appeals against scheme employers* be emailed to the Board.

35 DATA SCORES

Consideration was given to a report from the Team Manager - Business Relations, West Yorkshire Pension Fund (WYPF), which provided an update on the data scores for Lincolnshire Pension Fund reported to The Pension Regulator (TPR), as required under this year's TPR returns.

The Board was advised that in July 2019, a revised draft conditional data report was issued to Funds by the Scheme Advisory Board and TPR. The changes had standardised the checks required of all Funds for conditional data and therefore would impact on future data scores.

However, it was brought to the Board's attention that, either owing to technical or recording issues, the report did not include all of the new data required. The Board was assured that work was being undertaken to address this issue and to ascertain why the information was not included within the report. It was advised that once the revised report was available, it would be resent to TPR.

In response to a question, it was advised that a definition of *missing earnings* would be emailed to the Board.

RESOLVED

- (1) That the report be noted.
- (2) That a revised report be provided at the next meeting of the Board.
- (3) That a definition of *missing earnings* be emailed to the Board.

36 TEMPORARY BANK ACCOUNTS

Consideration was given to a report from the Team Manager - Business Relations, West Yorkshire Pension Fund (WYPF), on the number of temporary bank accounts created by the WYPF to hold monies due to beneficiaries of the scheme.

It was advised that the number of temporary deposit accounts held for lost contact pensioners/deferred members had decreased from 64, which had been reported at the last meeting of the Board, to 42. A full breakdown of the number of accounts opened and closed was detailed at Appendix 1 to the report.

The number of temporary deposit accounts for Post 2014 Preserved Refunds had increased from 38 to 64. However, this was expected as more members reached their five year deadline. It was noted that the National Technical Group (NTG) had contacted the Scheme Advisory Board to request a change in the Local Government Pension Scheme Regulations 2013 to remove the requirement for a refund to be paid within five years. The NTG was awaiting a response.

The Board was assured that payments into temporary bank accounts were only made when all tracing options had been exhausted. A list of those tracing companies used would be emailed to the Board, for information. The accounts were regularly monitored and were closed when members were located.

It was requested that, for inclusion in future reports, detail be provided on those accounts which remained open, including the duration of the account; its value; and a matrix of the membership category.

RESOLVED

- (1) That the report be noted.
- (2) That a further update be presented to the next meeting of the Board, including detail on those accounts which remained open, including the duration of the account; its value; and a matrix of the membership category.

37 EMPLOYER MONTHLY SUBMISSIONS UPDATE

Consideration was given to a report by the Accounting, Investment and Governance Manager, which provided up to date information on Employer Monthly Submissions for the second quarter (July to September) of the financial year 2019/20.

A summary of all late contributions or data submissions since April 2019 was set out in table one on page 84 of the Agenda Pack. A summary of employers receiving a fine for late submissions was set out in table two and details of the individual employers for quarter two could be found at Appendix A to the report.

Concerns had previously been raised by both the Pensions Committee and the Pension Board at their meetings in October 2019 regarding the continuing number of employers submitting late or incorrect data and contributions. Officers had agreed to review the Fund's arrangements for monitoring contributions and report back to the Committee and the Board. In reviewing arrangements, the following actions had been taken:

- The Fund had enquired with other funds as to the processes they had in place to monitor contributions. The Fund had remained content that processes were robust and as comprehensive as other funds.
- The Independent Chair of the Pension Board had written to all employers and payroll providers, in November 2019, reminding them of their statutory responsibilities for providing information to the Pension Fund. It was hoped this would yield positive results.
- The Fund had also revisited internal processes to ensure that they remained focussed and robust.
- The Fund had also revisited its escalation processes to ensure that any issues were addressed at the earliest opportunity.

The Board was advised that changes in payroll providers, as well as staffing changes, were two of the main reasons for late or incorrect submissions.

Members were invited to ask questions, in which the following points were noted:

- Members raised concerns and questioned what actions were being taken against employers who were repeatedly submitting late or incorrect data.
- The Accounting, Investment and Governance Officer personally contacted some employers and engaged in discussion.

- The complexity of the data that needed to be provided and the reasons why submissions may be difficult for new payroll providers were acknowledged. It was suggested that, to simplify the process, a standard template for the submission of data could assist payroll providers, as they might deal with a variety of Funds, who required differing information.

RESOLVED

That the report be noted.

38 BORDER TO COAST PENSION BOARD CHAIRS' MEETING

Consideration was given to a report which set out the minutes from the Border to Coast Pension Board Chairs' meeting held on 10 October 2019.

The Chair presented the draft notes of the meeting, which were detailed within the report.

Reference was made to section three of the notes - *Holding Border to Coast to Account*, page 90 of the agenda pack refers. There had been some discussion at the meeting concerning the potential conflicts of interest in relation to shareholder nominated Non-Executive Directors. It was confirmed that Lincolnshire County Council shared this concern.

RESOLVED

That the notes of the Border to Coast Pension Board Chairs' Meeting be noted.

39 THE PENSIONS REGULATOR - GOVERNANCE AND ADMINISTRATION
"DEEP DIVE" ENGAGEMENT REPORT

Consideration was given to a report from the Head of Pensions which introduced The Pensions Regulator's (TPR) Governance and Administration Risks in Public Service Pension Schemes Engagement Report, a 'deep dive' into the administration and government of ten local government pension scheme funds.

The full engagement report was attached at Appendix A to the report, and the key recommendations taken from the Hymans Robertson 60 Second Summary were presented to the Board by the Head of Pensions, page 94 of the Agenda Pack refers.

It was advised that Lincolnshire was already to a greater extent delivering the key recommendations.

A discussion ensued regarding the key recommendations on cyber security and it was confirmed that this already featured on the risk register. It was requested that the Board received an item on cyber security at a future meeting, particularly on accountability and whether there had been any data breaches.

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RESOLVED

- (1) That the report be noted.
- (2) That the Board receive an item on cyber security at a future meeting, particularly on accountability and whether there had been any data breaches.

40 TRAINING NEEDS

Consideration was given to a report which provided an opportunity to discuss any training attended since the last meeting of the Board.

Attached to the report at Appendices A and B were the following conference highlights:

- LGPS Pension Managers' Conference in Torquay – 19-20 November 2019; and
- Local Authority Pension Fund Forum – Conference 2019 in Bournemouth – 4-6 December 2019.

The Board was reminded that the Pension monthly newsletter contained information on relevant external training courses. Should any of the members wish to book onto one of these events, they should contact a member of the Pensions Team.

It was highlighted that Gerry Tawton and Kim Cammack had recently attended the LGPS Fundamentals training.

It was also highlighted that the Chair had attended the Border to Coast Pension Conference. It was also noted that the Chair had attended two private pension scheme events: Professional Pensions Scheme Funding Summit; and the Mercer Chair of Trustees Forum. Notes from the two private pension scheme events would be emailed to the Board, for information.

A training session for the Pensions Committee and the LGPS Pension Board had been arranged for 13 February 2020, which would include a presentation from Border to Coast on its UK internal equity sub funds. It was hoped that another fund manager could attend to present information on investing in UK property.

RESOLVED

That the report be noted.

41 WORK PLAN

The Accounting, Investment and Governance Manager set out the proposed work plan for the next meeting of the Board.

It was agreed that further updates on the Temporary Bank Accounts; The Pensions Regulator Data Score; Cyber Security; the effectiveness of the Board be presented to future meetings of the Board.

The meeting closed at 4.20 pm.

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**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pension Board
Date:	16 July 2020
Subject:	Pension Fund Update Report

Summary:

This report updates the Board on Fund matters over the quarter ending 31 March 2020 and any current issues.

The report covers:

1. Local Authority Pension Fund Forum Membership
2. TPR Checklist Dashboard
3. Breaches Register Update
4. Risk Register Update
5. Asset Pooling Update
6. Investment Consultancy Services Appointment
7. Actuarial Services Appointment
8. FSS Updates

Recommendation(s):

That the Board note the report.

Background

1 Local Authority Pension Fund Forum Membership

1.1 The Fund participates in the Local Authority Pension Fund Forum that has a work plan addressing the following matters:

- **Corporate Governance** – to develop and monitor, in consultation with Fund Managers, effective company reporting and engagement on governance issues.
- **Overseas employment standards and workforce management** - to develop an engagement programme in respect of large companies with operations and supply chains in China.

- **Climate Change** - to review the latest developments in Climate Change policy and engage with companies concerning the likely impacts of climate change.
- **Mergers and Acquisitions** - develop guidance on strategic and other issues to be considered by pension fund trustees when assessing M&A situations.
- **Consultations** – to respond to any relevant consultations.

1.2 The latest LAPFF engagement report can be found on their website at www.lapfforum.org. Some of the highlights during the quarter included:

- During this quarter LAPFF undertook 55 engagements with 36 companies, on issues ranging from human rights and employment standards to climate change reporting and environmental risk.
- Over the last few months, the number of banks being targeted for their lending policies on climate has increased. LAPFF stepped up its engagement with banks over their lending policies to ensure that they are aligned with Paris Agreement objectives and are undertaking lobbying in a manner consistent with these objectives. To this end, LAPFF met both with ANZ Bank and with Barclays during the quarter to encourage them along these lines.
- As part of the community engagement element of the investor tailings dam initiative, LAPFF has been liaising with community representatives over a list of high risk tailings dams in Brazil. Vale has by far the largest number of dams on the list, but Anglo American and Arcelor Mittal are also represented. Therefore, LAPFF has approached all three companies to try to gain assurances that they have taken adequate steps to prevent further tailings dam collapses. All three companies have responded positively to these requests.
- LAPFF members co-filed two resolutions with Amazon and Alphabet. Both of these resolutions were aimed at social issues. The Amazon resolution sought to involve employee representatives at board level, while the Alphabet resolution requested board level oversight of human rights risks. Both resolutions were blocked by the SEC. This outcome was disappointing but not unexpected in light of the SEC's recent consultation on shareholder resolutions. This consultation seemed to be aimed at reducing the number of resolutions that US companies receive by making it harder to file and co-file. It remains to be seen what the outcome of the consultation will be, but it is likely that the shareholder resolution route in the US will be significantly curtailed, if not abandoned altogether, in light of these developments.
- LAPFF has been partnering with Sarasin and other institutional investors in engagements with the Big Four auditing firms and Shell, BP and Total about incorporating climate appropriately in the audit process. While the

engagements with the audit firms were less than encouraging, both the audit firms and the companies themselves are showing signs of movement on this issue.

- 1.4 Members of the Board should contact the author of this report if they would like further information on the Forum's activities.

2 TPR Checklist Dashboard

- 2.1 To assist in the governance of the Lincolnshire Fund, it assesses itself against the requirements of the Pension Regulator's (TPR's) code of practice 14 for public service pension schemes, as set out in a check list attached at Appendix B. This is presented to the Committee and Board at each quarterly meeting, and any non-compliant or incomplete areas are addressed. This is seen as best practice in open and transparent governance.
- 2.2 No areas have changed since the last quarter's report.
- 2.3 The Areas that are not fully completed and/or compliant are listed below.

F1 – Maintaining Accurate Member Data - Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?

Amber - Scheme member records are maintained by WYPF. Therefore much of the information here and in later questions relates to the records they hold on LCC's behalf. However, as the scheme manager, LCC is required to be satisfied the regulations are being adhered to. Data accuracy is checked as part of the valuation process and the annual benefits statement process. Monthly data submissions and employer training are improving data accuracy, however there are a number of historical data issues that are in the process of being identified and rectified.

F5 - Maintaining Accurate Member Data - Are records kept of decisions made by the Pension Board, outside of meetings as required by the Record Keeping Regulations?

Grey – not relevant as we do not expect there to be decisions outside of the PB. This will be monitored.

H7 - Maintaining Contributions - Is basic scheme information provided to all new and prospective members within the required timescales?

*Amber - New starter information is issued by WYPF, **when they have been notified by employers**. This is done by issuing a notification of joining with a nomination form, transfer form and a link to the website. However, because the SLA relates to when notified, it does not necessarily mean the legal timescale has been met which is within 2 months of joining the scheme. The monthly data returns and employer training are improving this process.*

K7 – Scheme Advisory Board Guidance - Members of a Local Pension Board should undertake a personal training needs analysis and put in place a personalised training plan.

Remaining Amber - Annual Training Plan of Committee shared with PB and all PB members invited to attend.

3 Breaches Reporting - update

3.1 The Fund, and those charged with its governance, has a requirement to log and, where necessary, report breaches to the Pensions Regular. The Breaches Register attached at appendix B shows those breaches logged since recording began. Since the last Pension Board quarterly meeting, one breach has been added, detailed below:

- **Late payment of contributions** – a separate paper is presented to the Board at paper 8, updating the Board on all monthly employer contribution breaches over quarter (January to March).

4 Risk Register Update

4.1 The risk register is brought to this Committee at agenda item 10, therefore an update is not provided in this report.

5 Asset Pooling Update

Sub Funds

5.1 Following the transition to the Investment Grade Credit Fund in February/March, the post transition report from Inalytics has been issued, and a post transition workshop has been held with Border to Coast, Blackrock, Inalytics and the Partner Funds. There was one key issue of concern relating to currency hedging, which has highlighted additional controls to be put in place for future transitions, as part of the "lessons learned" process. It was also the subject of much discussion at the Joint Committee (papers of which were shared with the Committee).

5.2 The next investment is into the Multi Asset Credit (MAC) Fund, in the second half of 2020/first half of 2021. Following a delay due to the disruption in markets caused by the pandemic in March, officers are now progressing the initial investment into the appointed core MAC manager's fund ahead of the move to Border to Coast.

5.3 The transition from the UK Passive equity mandate managed by LGIM to the Border to Coast internally managed UK equity fund has also progressed. Transition costs were minimised as another partner fund was looking to exit the internal fund, and therefore holdings were able to be crossed. Officers

worked closely with Border to Coast and LGIM to ensure that the transition was enacted as efficiently as possible.

- 5.4 Border to Coast have held a number of workshops with officers and advisors on the property offering, which will be one of the more complex transitions and will take a number of years. Further information on this will be brought to the Committee later this year.
- 5.5 Officers and advisors across the Partner Funds have continued to work closely with Border to Coast, through attendance at virtual meetings and workshops, on the development of the sub-fund products.

Joint Committee Meetings

- 5.6 The papers of the 16 June JC were circulated to all Pensions Committee members. The minutes will be circulated once approved, and below are the agenda items for that meeting:
- Elections for the Roles of Chairman and Vice Chairman of the Joint Committee and nominations for the Border to Coast Board
 - Joint Committee Budget
 - Border to Coast Market Review
 - Listed Equity Fund Performance Report
 - Sterling Investment Grade Transition
 - Pooling Property Assets
 - Chief Executive Officer (CEO) Report

5.7 The elections for the roles of Chairman and Vice Chairman were held, with Cllr Tim Evans (Surrey) being appointed as Chairman for the coming year, and Cllr David Coupe (Teesside) being appointed as Vice Chairman. Cllr Anne Walsh (Tyne & Wear) was nominated as the shareholder NED, to be put forward to the Board and shareholders for approval.

5.8 The next JC meeting will be held on 1 October 2020 and papers will be circulated to Committee members. Any questions or comments on the papers should be directed to Cllr Strenghiel, who can raise them at the meeting.

Shareholder Matters

- 5.9 As the Committee are aware, there are two distinct roles that Lincolnshire County Council has with Border to Coast: the shareholder and the investor (or client). The Committee's role is that of investor, and is represented at the Joint Committee by the Chairman of the Pensions Committee. The shareholder role is undertaken by the Executive Director of Resources, and fulfils the role as set out in the Shareholder Agreement, which was approved by Full Council in February 2017.
- 5.10 Ahead of any shareholder approvals, officers, including S151 officers, work closely with Border to Coast to ensure full understanding of the resolution,

the impact of it not being approved and discuss this with the JC ahead of any resolution being sent for approval. An informal shareholder meeting is also held on the date of each Joint Committee meeting.

- 5.11 There was only one shareholder resolution since the last report. This was related to the merger of the Northumberland Pension Fund with the Tyne and Wear Pension Fund, which reduced the number of shareholders in Border to Coast to eleven from twelve. The resolution enabled the redistribution of the share capital so that all eleven partner funds held equal shares following the merger. This was approved.

6 Investment Consultancy Services Appointment

- 6.1 As the Board are aware, there is currently a project underway by the Scheme Advisory Board (SAB) looking at governance across the LGPS, called the Good Governance Review, which will provide a framework for all Funds to follow. This is expected to be in place for April 2021.
- 6.2 The contract for Investment Consultancy services was awarded to Hymans Robertson in January 2014, with an expiry date of 31 December 2020. Given the upcoming guidance for governance arrangements and the potential changes that may be required, officers believe it would be useful to extend the current contract with Hymans Robertson for an additional twelve months. This would allow for a full governance review of the Lincolnshire Fund against the new requirements to be undertaken ahead of appointing a consultant.
- 6.3 In addition, the creation of the asset pools and the long term transition of all assets to Border to Coast means that the roles of the investment consultant and the independent advisor will change, therefore this extension also allows for this to be considered in the governance review.
- 6.4 Officers therefore requested that the Pensions Committee approved a twelve month extension to the Investment Consultancy services contract to 31 December 2021, at their meeting today.

7 Actuarial Services Appointment

- 7.1 At the March meeting of the Pensions Committee, it was agreed that the tender process for Actuarial Services for the Fund would be carried out by a working group of officers and volunteers from the Committee. An email was sent to all members in June requesting volunteers, and the both Cllr Strenziel and Cllr Adams responded positively to the request, in addition to the Committee's Independent Advisor, Peter Jones, offering his services.
- 7.2 The working group will be working over the summer months to provide a recommendation to the Pensions Committee at the October meeting.

8 Funding Strategy Update

- 8.1 The latest Funding Strategy Statement (FSS) was presented to the Board at the March 2020 meeting. Following further discussion with the Fund Actuary since the Valuation, there are some recommended changes to the FSS. These include one major change and two minor ones. The amended FSS with the proposed changes has been sent out to employers for consultation, and no responses have been received at the time of writing this report. The amendments are explained in the paragraphs below.

Major change - new transferee admission agreements

- 8.2 As reported previously to the Board, the LGPS (Amendment) Regulations 2018 created the new ability for admitted body employers to receive any surplus on cessation in the Fund (“an exit credit”). Prior to this any surplus was retained within the Fund, whilst the employer was required to pay any deficit due. The regulations allowing the repayment of surplus to LGPS employers came into effect on 14 May 2018.
- 8.3 Previously the nature of an employer’s participation in the Fund has not been a concern for the Fund, due to the requirement for guarantees and other forms of risk mitigation. However, the implementation of the new regulations changes the profile of risk to the Fund, as employers may not always be able to repay a deficit but the Fund will always be able to repay a surplus. Surpluses often arise as a matter of chance, based on changes in financial conditions between the date of joining and leaving the fund.
- 8.4 New transferee admitted bodies are created as a result of the award of a contract by a scheme employer. These new employers typically have a short participation period in the Fund and therefore cessation events occur frequently. Officers have worked with the Fund Actuary to consider and construct a funding model for new contractor admissions that will manage the change in the risk profile following implementation of the new regulations in a way that is “fair” to both the employer and the Fund.
- 8.5 The proposed new approach is to formalise a “pass-through” arrangement for all new contractors going forward. Under this approach the contractor pays an appropriate fixed employer contribution rate, agreed by the awarding authority and the Fund Actuary, during their participation in the Fund. At the end of the contract any funding surplus or deficit falls back to the awarding authority (who will ultimately have funded the pension contributions via the cost of the contract), and no cessation deficit/surplus is payable by/to the contractor. This arrangement is set out within the contract terms between the two parties, in a risk sharing arrangement.
- 8.6 This approach mirrors many of the arrangements that our awarding employers are currently entering into with contractors outside of admission agreements, as contractors’ demand to be protected from pension funding risk.

- 8.7 Any cessation deficit or surplus reverting to the awarding authority will be absorbed into the existing assets and liabilities of that authority and be considered as part of the funding evaluation at the next triennial valuation.
- 8.8 Under the proposed approach an individual funding position is still allocated to the admitted body, as in addition to the pass-through rate they still retain responsibility for admitted body controlled risks e.g. excessive salary growth, early payment of benefit on unreduced terms, augmentation of benefit etc. Again, this needs to be clearly set out in any contract arrangements.
- 8.9 As mentioned in paragraph 8.1 employers have been consulted about this potential change to the funding approach, and communications will continue to ensure that pensions are considered at the beginning of any potential outsourcings or contract renewals.
- 8.10 It is not proposed to apply the changes retrospectively to existing admission agreements, but to make this the default option for any new contractor admission from September.

Minor amendments – Small Scheduled Bodies Pool and McCloud Treatment for Cessations

- 8.11 The Small Scheduled Bodies pool is made up of Town and Parish Councils, who normally have very few members (often only one or two) and are pooled to spread the risk and to reduce the volatility of their contributions. Clarification has been added to the cessation calculation process of the employers in this pool, in respect of how deficits are calculated.
- 8.12 As the Board are aware, there is no agreed remedy for the McCloud court case and how it might impact the benefit structure for members, and therefore the costs to employers. The Fund has considered how it will reflect the current uncertainty regarding the outcome of this judgement in its approach to cessation valuations. The change made is to clarify that for cessation valuations that are carried out before any changes to the LGPS benefit structure (from 1 April 2014) are confirmed, the Fund's policy will be that the Actuary will add a 1% loading to calculated liabilities for "gilts exit" cessations (where there is no guarantor). On the grounds of consistency, simplicity and pragmatism, there would be no adjustment to a cessation value where the obligations are being passed on elsewhere.
- 8.13 At the meeting earlier today, the Pensions Committee were asked to agree the proposed changes detailed above, namely:
- the funding strategy for new transferee admission agreements - specifically the move to a "pass-through" arrangement for new employers, with an agreed fixed contribution rate, no surplus or deficit crystallisation on cessation, and additional payments only required for employer controlled risks;
 - the clarification on cessations for the Small Scheduled Body Pool; and
 - the clarification on the approach to the McCloud impact on cessations.

8.14 Once approved by the Committee, the amended Funding Strategy Statement will be published to reflect the change in funding approach.

Conclusion

9 The Fund Update report is a quarterly report to the Pension Board, to update the Board on Pension Fund matters and any current issues.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	TPR Checklist Dashboard
Appendix B	Breaches Register

Background Reports

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk.

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The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Summary Results Dashboard

No	Completed	Compliant
Reporting Duties		
A1	G	G
A2	G	G
A3	G	G
A4	G	G
Knowledge & Understanding		
B1	G	G
B2	G	G
B3	G	G
B4	G	G
B5	G	G
B6	G	G
B7	G	G
B8	G	G
B9	G	G
B10	G	G
B11	G	G
B12	G	G
Conflicts of Interest		
C1	G	G
C2	G	G
C3	G	G

No	Completed	Compliant
C4	G	G
C5	G	G
C6	G	G
C7	G	G
C8	G	G
C9	G	G
C10	G	G
C11	G	G
Publishing Scheme Information		
D1	G	G
D2	G	G
D3	G	G
D4	G	G
Risk and Internal Controls		
E1	G	G
E2	G	G
E3	G	G
E4	G	G
E5	G	G
E6	G	G
E7	G	G
E8	G	G

No	Completed	Compliant
Maintaining Accurate Member Data		
F1	A	A
F2	G	G
F3	G	G
F4	G	G
F5		
F6	G	G
F7	G	G
F8	G	G
F9	G	G
F10	G	G
F11	G	G
Maintaining Contributions		
G1	G	G
G2	G	G
G3	G	G
G4	G	G
G5	G	G
G6	G	G
G7	G	G
G8	G	G
G9	G	G

No	Completed	Compliant
Providing Information to Members and Others		
H1	G	G
H2	G	G
H3	G	G
H4	G	G
H5	G	G
H6	G	G
H7	G	A
H8	G	G
H9	G	G
H10	G	G
H11	G	G
H12	G	G
H13	G	G
Internal Dispute Resolution		
I1	G	G
I2	G	G
I3	G	G
I4	G	G
I5	G	G
I6	G	G
I7	G	G

No	Completed	Compliant
I8	G	G
I9	G	G
Reporting Breaches		
J1	G	G
J2	G	G
J3	G	G
Scheme Advisory Board Requirements		
K1	G	G
K2	G	G
K3	G	G
K4	G	G
K5	G	G
K6	G	G
K7	A	A
K8	G	G
K9	G	G
K10	G	G
K11	G	G
K12	G	G
K13	G	G
K14	G	G
K15	G	G

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Lincolnshire Pension Board Record of Breaches

Date	Category (e.g. administration, contributions, funding, investment, criminal activity)	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported / Not reported (with justification if not reported and dates)	Outcome of report and/or investigations	Outstanding actions
31/7/15	Contributions	Late payment by LCC for June contributions, following late payment for April and May.	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Aware of breach, extenuating circumstances, trying to fix issues.	Reported through portal 31/7/15		
31/8/16	ABS's	100% required output of ABS's not met	Late receipt of ABS info to members	Not material and improvement on previous year – first full year of monthly returns	Not reported – total 92.6% of active and deferred produced overall – not material to report		
31/3/17	Contributions (see report)	Late payments over the year	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		

May 2017	Administration	Data security breach – a small number of ABS's went out unsealed	Potential for individuals data to be seen by unauthorised individuals	WYPF contacted printing company for explanation. Breach reported to information security officers at both WYPF and LPF	Not reported to tPR. Small number impacted, human error the cause.		
Sept 17	Contributions	Late payments May to August	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Issue raised at LEAF meeting
Sept 17	LCC - Leavers information	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	LCC given opportunity to provide improvement plan and timescales	Not reported, but under review.		
Dec 17	LCC - Leavers information – updated	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	Improvement plan provided, presentation to Board to discuss in January	Not reported, but under review.		
Dec 17	Contributions - updated	Late payments Sept to November	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Issue to be raised at March employers meeting

Mar 18	LCC Leavers information – updated	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	Update on improvement plan presented to Board to discuss in March	Not reported, but under review.		
March 18	Contributions - updated	Late payments December to February	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Issue to be raised at March employers meeting
April 18	LCC Leavers information – updated	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	LCC self-reported to TPR	Reported	Jan 19 - Improvement plan completed and reported back to TPR	Regular updates to be provided to TPR and Board
July 18	Contributions – updates	Late payments	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Continuing training and communications with employers
July 18	LCC Leavers information – updated	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	LCC self-reported to TPR	TPR updated		Regular updates to be provided to TPR and Board
September 18	Contributions – updates	Late payments	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Continuing training and communications with employers

September 18	LCC Leavers information – updated	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	LCC self-reported to TPR	TPR updated		Regular updates to be provided to TPR and Board
December 18	Contributions – updates	Late payments	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Continuing training and communications with employers
February 19	Contributions – updates	Late payments	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Continuing training and communications with employers Fines increased
June 19	Contributions – updates	Late payments	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Continuing training and communications with employers
Sept 19	Contributions – updates	Late payments	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Continuing training and communications with employers
December 19	Contributions – updates	Late payments	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Continuing training and communications with employers Review of process

**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pensions Board
Date:	16 July 2020
Subject:	Pensions Administration Report

Summary:

This is the quarterly report by the Fund's pension administrator, West Yorkshire Pension Fund.

Yunus Gajra, the Business Development Manager from WYPF, will update the Board on current administration issues.

Recommendation(s):

That the Board note the report.

Background

1.0 Performance and Benchmarking

1.1 WYPF uses workflow processes developed internally to organise their daily work with target dates and performance measures built into the system. The performance measures ensure tasks are prioritised on a daily basis, however Team Managers have the flexibility to re-schedule work should time pressure demand.

1.2 The table below shows the performance against key areas of work for the period 1 January 2020 to 31 December 2020.

KPI's for the period 1.1.20 to 31.03.20						
WORKTYPE	TOTAL CASES	TARGET DAYS FOR EACH CASE	TARGET MET CASES	MINIUM TARGET PERCENT	TARGET MET PERCENT	AVERAGE TIME TAKEN
AVC In-house (General)	67	10	66	85	98.51	1.88
Age 55 Increase to Pension	3	Next Payroll	3	85	100	20
Change of Address	246	5	237	85	96.34	1.83

Change of Bank Details	84	5	70	85	83.33	4.79
DWP request for Information	1	10	1	85	100	3
Death Grant Nomination Form Received	509	20	509	85	100	2.44
Death Grant to Set Up	22	5	22	85	100	0.73
Death In Retirement	144	5	138	85	95.83	2.33
Death In Service	8	5	7	85	87.5	2.5
Death on Deferred	5	5	5	85	100	1.6
Deferred Benefits Into Payment Actual	303	5	283	90	93.4	1.47
Deferred Benefits Into Payment Quote	344	35	330	85	95.93	8.75
Deferred Benefits Set Up on Leaving	768	10	722	85	94.01	8.53
Divorce Quote	52	20	50	85	96.15	4.17
Estimates for Deferred Benefits into Payment	10	10	10	90	100	2
General Payroll Changes	81	5	79	85	97.53	1.57
Initial Letter Death in Service	8	5	8	85	100	1.75
Initial letter Death in Retirement	144	5	142	85	98.61	1.71
Initial letter Death on Deferred	5	5	4	85	80	2.8
Monthly Posting	761	10	751	95	98.69	1.66
NI adjustment to Pension at State Pension Age	12	20	12	85	100	12.42
Payment of Spouses Child Benefits	59	10	55	100	93.22	3.36
Pension Estimate	168	10	163	75	97.02	2.36
Pension Saving Statement	1	20	1	100	100	1
Refund Actual	227	10	222	95	97.8	1.19
Refund Quote	228	35	226	85	99.12	2.6
Retirement Actual	121	3	117	90	96.69	1.59
Set Up New Spouse Pension	59	5	49	85	83.05	3.36
Spouse Potential	2	20	2	85	100	2.5
Transfer In Actual	39	35	37	85	94.87	6.87
Transfer In Quote	59	35	58	85	98.31	3.71
Transfer Out Payment	25	35	23	85	92	9.84
Transfer Out Quote	64	20	58	85	90.63	8.84
Update Member Details	1568	20	1564	100	99.74	1.28

2.0 Scheme Information

2.1 Membership numbers in the Lincolnshire Fund are as follows:

Numbers	Active	Deferred	Undecided	Pensioner	Frozen
LGPS	22,973	27,043	580	23,524	2,536
Percentage of Membership	29.97	35.28	0.76	30.69	3.30
Change from Last Quarter	-157	-371	-119	+200	-81

2.2 The number of new joiners in the Fund were during the period 1 January 20 to 31 March 20 were 1083 made up as:

Lincolnshire County Council	349
Other Employers	734

2.3 The number of members who are in the 50:50 scheme are 183 made up as:

Lincolnshire County Council	86
Other Employers	97

2.4 Age Profile of the Scheme

Status	Age Groups												TOTAL
	U20	20-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61-65	66-70	70+	
Active	320	1,481	1,554	1,986	2,493	2,730	3,672	3,720	3,043	1,630	261	83	22,973

2.3 Employer Activity - During Jan 20 to March 20

New Academies and Education Trusts	5
New Town and Parish Council	0
New Admission Bodies	0
Total of New Employer	5
Employers Exited	6
Total Numbers of employers	276

3.0 Member and Employer Contact

3.1 Over the quarter January to March we received **0** online customer responses.

Over the same period **193** Lincolnshire member's sample survey letters were sent out and **25 (13%)** returned:

Overall Customer Satisfaction Score:

January to March 2019	April to June 2019	July to September 2019	October to December 2019	January to March 2020*
81.3%	83.5%	87.9%	84.5%	78.7%

* There were no identifiable reasons indicated in the survey responses as to why the scores were lower in the last period.

Appendix A – Customer survey results.

3.2 Employer Training

Over the quarter October 2019 to 31 December 2019 one Employer training session on 'Your Monthly Return' was held.

LPF Customer satisfaction score was 90.87%.

Appendix B – Employer feedback summary.

4.0 Internal Disputes Resolution Procedures

4.1 All occupational pension schemes are required to operate an IDRP. The LGPS has a 2-stage procedure. Stage 1 appeals, which relate to employer decisions or actions, are considered by a person specified by each employer to review decisions (the 'Adjudicator'). Stage 1 appeals relating to appeals against administering authority decisions or actions are considered the Pension Fund Manager. Stage 2 appeals are considered by WYPF.

Stage 1 appeals against the fund

No appeals in this period.

Stage 1 appeals against scheme employers

No appeals in this period.

Stage 2 appeals

Two decision made in this period.

Date application received	Reason for appeal	Current position/Outcome	Date decision letter sent
21/1/2020	Appeal re details of pay/contributions used in calculation of benefits.	Turned down. Pay information provided by LCC (Serco) checked across the member's post and we were happy with the information provided.	27/3/2020
31/10/19	Refusal to pay CETV when member was within a year of normal retirement age.	Information requested from employer. Holding letter sent to extend deadline to 10/1/2020. Appeal now concluded and turned down.	10/1/2020

Ombudsman

4.2 One case outstanding

Date application received	Details of complaint	Current position/outcome	Date complete
5/7/2019	The member's appeal was in regard to a dispute over the periods of service used in her pension calculation. The member had worked changing hours in a number of different employments over the years. The scheme employer did not hold complete historical information of her working hours.	Being dealt with by LCC Legal. Information provided to them. Further information provided to LCC Legal in September. Payment of £500 compensation agreed in October. Chasing up with LCC Legal to see if final decision has been made.	

5.0 Administration Update

5.1 On 23 March the prime Minister asked that everyone stay at home except for a few restricted activities one of which was:

'Travelling to and from work, but only where work absolutely cannot be done from home'.

Urgent negotiations commenced with Bradford Council's IT to procure remote working equipment for the bulk of the staff that could not work from home, and within a matter of a couple of weeks all staff were enabled to work remotely.

Staff now only attend the office on a needs basis, i.e. to print, to scan post etc. Alternative arrangements for these tasks are now also in place.

After a short period of downtime for some individual members of staff who may have been self-isolating or had childcare issues when schools closed, it is now almost business as usual.

5.2 The Pension Regulator's advice applicable to DB schemes for administrators recommends that the focus of service delivery at this time should be on the following areas:

- Payment of benefits
- Employer contributions
- Minimising the risk of scams
- Supporting good decision making.

5.3 TPR also provided some comfort to administrators by recognising that some administrative breaches may occur at this time but they will maintain a 'proportionate and fair approach' to any action to take.

5.4 Payroll

We have tested and proved that our payroll can be run by members of staff working from home if necessary. However, we have made one change which is that our daily payroll will now be run weekly each Thursday.

5.5 Transfer Values

The processing of transfers is a second level priority. Club transfers and transfers from schemes with a guarantee date will be processed although it might be more slowly.

5.6 Transfers in

Transfers in from personal pensions i.e. money purchase or defined contribution (DC) schemes are more of a concern as investment values are likely to have dropped in the period between receiving the member's election forms and requesting the money.

We are currently investigating with some of the bigger personal pension providers what their view is on proceeding in these circumstances and what the members' options might be. When we have more information on this we will write to affected members in line with the TPRs direction to support good decision making.

5.7 Transfers Out

We are aware that unscrupulous financial advisers may still try to target firefighters to release benefits. We have therefore added the tPR's latest guidance on scams to our website and briefed both the Contact Centre and Fire Team staff on these issues.

5.8 Children's Pensions

Because schools, colleges and universities have closed, we will continue to pay children's pensions where we know students are only part-way through a course. For students who we know are in their last year of school, we would ask them as normal if they intend to go on to further study. If they say they are intending to continue their studies we will continue to pay their pension as normal (this is usual

practice). For college or university students who we know are in their final year of study, we will suspend the pension as normal in June.

5.9 Deferred Benefit Statements (DBS)

The number of Deferred Benefit Statements produced for all LPF members currently stands at 21,728 which represents 82.1% of members eligible to receive one. The number of statements produced each day was initially reduced from 2,000 to 500 each day. Now that working arrangements are more settled the limit has been increased to 1,000 per day.

5.10 Annual Benefit Statements (ABS)

The number of Annual Benefit Statements produced for LPF members currently stands at 74.1% of members eligible to receive one. Similar to DBS's, the number of statements produced each day was initially reduced from 2,000 to 500 each day. Now that working arrangements are more settled the limit has been increased to 1,000 per day.

5.11 Remote Working

The arrangements for staff working remotely are operating well, with staff being able to do their normal work without any major issues. In line with Government advice, the arrangements are set to continue for the foreseeable future.

5.12 Security Breaches

During this period one security breach was logged which were reported to the Council's Data Protection Officer. This was deemed to be an isolated incident due to human error and was not reported to the ICO.

5.13 Bradford Council Internal Audits

The following Internal Audits have been undertaken by the Council's Internal Auditors:

- Accuracy of contributions recorded on member records

Seven recommendations have been made which are welcomed. Most of them focus on exceptional cases. The issues arise for deferred and pensioner members (active members are fine). Phase three of the monthly contribution project has started which will address some of these recommendations. As part of this engagement Finance will work with Employers and Payroll providers to address some issues identified.

- Annual benefits statements

It is audit's opinion that the standard of control of identified risks in the system is **excellent**.

The audit review has determined that the identified risks are being effectively managed. The control environment is as expected and supports the achievement of key business objectives.

A key improvement in the production of annual benefits statements and deferred benefits statements has been the information made available to members on the value of their benefits at a number of stages from age 55 to their normal retirement age.

In addition to providing useful information to the members in receipt of the statements, the improvement has also had the added benefit of reducing the number of members making contact with the Pension Fund, who would otherwise be requesting this information.

5.14 ISO9001 Quality Audits

The following internal quality audits were completed by WYPF staff:

- Diary Control System to verify entitlement to Children's Pensions;
- Divorce;
- General Payroll Maintenance; and
- Suggestions for improvements to working practices are being analysed by the relevant managers.

6.0 Current Technical Issues

See Appendix C.

7.0 Shared service Budget

7.1 Cost per member

LPF PENSION ADMIN	2018/19 OUTTURN £000	2019/20 BUDGET £000	2019/20 FORECAST PD09 £000	2019/20 OUTTURN PD13 £000	2019/20 VAR BGT - PD13 FAV (ADV) £000	2020/21 BUDGET £000
LPF member number	77,042	Number reduced as a result of linking members records		76,734		76,734
Cost per member	£13.45			£15.69		£16.60
	£1,036,211			£1,204,057		£1,273,563

7.2 Shared Service Budget

WYPF PENSION ADMIN	2018/19 OUTTURN £000	2019/20 BUDGET £000	2019/20 FORECAST PD09 £000	2019/20 OUTTURN PD13 £000	2019/20 VAR BGT - PD13 FAV (ADV) £000	2020/21 BUDGET £000
Accommodation	£158	£142	£182	£282	£130	£182
Actuary	£0	£0	£165	£165	£165	£0
Computer	£15	£240	£265	£297	£37	£265
Contingency	£0	£866	£0	£0	£866	£0
Employees	£3,165	£3,454	£3,419	£3,532	£78	£3,547
Internal Recharge	£1,920	£2,235	£1,954	£1,722	£513	£2,244
Other Running Costs	£107	£70	£148	£142	£72	£148
Transaction Costs	£0	£0	£0	£0	£0	£0
Printing & stationery	£259	£366	£593	£512	£146	£650
TOTAL EXPENDITURE	£5,624	£7,373	£6,726	£6,652	£721	£7,036
Total member number	418,143			423,929		423,929
Cost per member	£13.45			£15.69		£16.60
Charge to WYPF Account	£3,636	£5,304	£4,677	£4,687	£617	£4,900
Other Income	£163	£126	£36	£40	£86	£36
Shared Service Income	£1,825	£1,943	£2,013	£1,925	£18	£2,100
TOTAL INCOME	£5,624	£7,373	£6,726	£6,652	£721	£7,036

8.0 Awards

WYPF were winners of the DB Scheme of the Year at the Pensions Age Awards held in London in February 2020.

Conclusion

WYPF and LPF continue to work closely as shared service partners to provide an efficient and effective service to all stakeholders within the Lincolnshire Pension Fund.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Customer survey results
Appendix B	Employer Feedback summary
Appendix C	Current Technical Issues

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the Pensions Manager.

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Yunus Gajra, who can be contacted on 01274 432343 or Yunus.gajra@wypf.org.uk.

Customer Survey Results - Lincolnshire Members

(1st January to 31st March 2020)

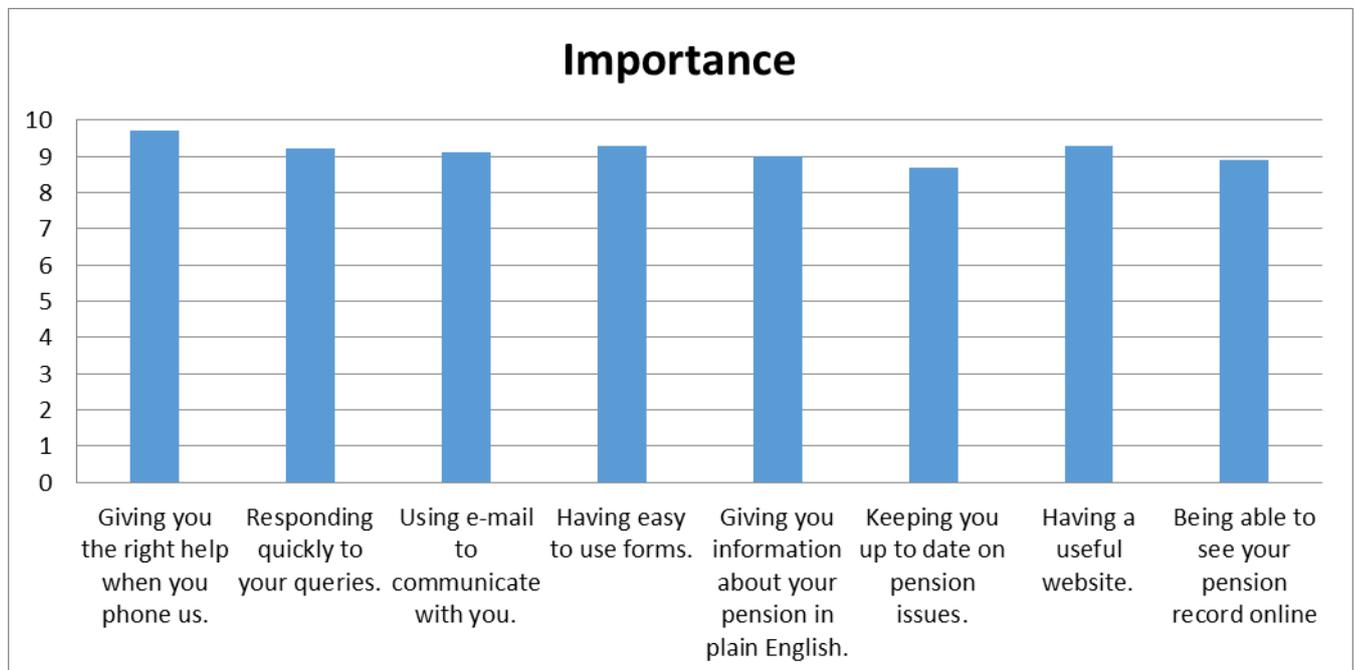
Over the quarter January to March we received **0** online customer responses.

Over the quarter January to March **193** Lincolnshire member's sample survey letters were sent out and **25 (13%)** returned:

Overall Customer Satisfaction Score;

January to March 2019	April to June 2019	July to September 2019	October to December 2019	January to March 2020
81.3%	83.5%	87.9%	84.5%	78.7%

The charts below give a picture of the customers overall views about our services;



Sample of positive comments:

Member Number	Comments
8127827	Very good always helpful when I contacted a pension advisor. I transferred a number of pensions into my LGPS pension, the process was straight forward and all the information I received was easy and clear to understand.
8124760	Marian has been very helpful at giving me facts to help me decide transfer in. Everyone on the phone has been very helpful. Soon I will be contacting you for my retirement and hope to receive continued good service.
8018573	Efficient with correct accurate information provided. WYPF responded to my enquires satisfactory which helped me to make my retirement decision. Accurate information is vital when making important decisions regarding a pension.
8017263	You have been very supportive and informative and did what you promised.
8132634	Never had any issue when calling, excellent service.

Complaints/Suggestions:

Member Number	Comments	Summary of Acknowledgement Letter Sent to Member
8129285	Not at all satisfactory. I was not kept informed during the pension transfer process. I requested an up to date figures once the pension had been transferred and was told I could not have it until the end of March as they are not available apart from then. The online service is impossible to access. I have given up on trying to use it.	Member was not happy about the length of time her transfer in took (approx 3mths) or that we could not supply a statement of benefits that included the transfer credits. Letter to member to explain transfer in process and that timescale was not unreasonable and that annual statements are produced at the year end, once employer provides information and will include the transfer credits bought.
8125840	Very poor confused service. Yes, I wish to complain about the poor service and delay overall.	Apology letter sent.

Employer Feedback (All funds)

Quarter 1 January – March 2020

Your Monthly Return – January 2020

Feedback score:

WYPF 96.42%
LPF 90.87%
Hounslow No score available*

Comment	Action taken
I hoped it would help me do my daily job but the content covered today is what our payroll department does.	The course description clearly explains what it is about and who it is suitable for.
Include basic training of employer portal, submitting leaver forms etc.	The portal itself is covered to some degree and more so in the complete guide workshop.

A summary of the compliments

- Very useful & helps my understanding of the process of completing on line forms/returns
- Workshop has helped me with a few queries, thank you

*The feedback forms for this session are missing from the electronic register. Once back in the Bradford office I will check the secure store cupboard.

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Current Issues

1) **Good Governance project**

SAB approved resources for Phase three of the Good Governance project. This phase will determine:

- the outcome measures it will use
- the format of this work, and
- a timetable for implementation.

2) **The LGPS (Amendment) Regulations 2020 – exit credits**

On 27 February 2020, MHCLG published a partial response to the consultation covering changes to the local valuation cycle and the management of employer risk. The response covers the proposals on exit credits only. MHCLG will submit a further response to the other proposals covered by this consultation in due course.

The response confirms that most respondents supported the proposal to allow administering authorities to take account of an employer's exposure to risk when calculating an exit credit. MHCLG confirms in the response that they will amend the LGPS regulations so that:

- administering authorities may determine the amount of any exit credit payment due, having regard to any relevant considerations
- the period within which an exit credit must be paid is increased from three months to six months
- administering authorities will not be obliged to enquire into the precise risk sharing arrangement adopted
- any exit credits that have not been paid shall only be due if the administering authority exercises its discretion to pay them
- any exit credits that have already been paid shall be treated as if the administering authority exercised its discretion to pay that amount – an administering authority may not seek to change the amount paid
- the Pensions Ombudsman has jurisdiction to hear complaints if any dispute is not resolved using the internal dispute resolution process
- administering authorities should set out their exit credit policy in their Funding Strategy Statement.

3) **2020/21 Draft employee contribution bands**

Below are the draft employee contribution bands, which will be effective from 1 April 2020. They are calculated by increasing the 2019/20 employee contribution bands by the September 2019 CPI figure of 1.7% and then rounding down the result to the nearest £100.

Table 1: Contribution table England and Wales 2020/21

<u>Band</u>	<u>Actual pensionable pay for an employment</u>	<u>Main section contribution rate for that employment</u>	<u>50/50 section contribution rate for that employment</u>
<u>1</u>	<u>Up to £14,600</u>	<u>5.50%</u>	<u>2.75%</u>
<u>2</u>	<u>£14,601 to £22,800</u>	<u>5.80%</u>	<u>2.90%</u>
<u>3</u>	<u>£22,801 to £37,100</u>	<u>6.50%</u>	<u>3.25%</u>
<u>4</u>	<u>£37,101 to £46,900</u>	<u>6.80%</u>	<u>3.40%</u>
<u>5</u>	<u>£46,901 to £65,600</u>	<u>8.50%</u>	<u>4.25%</u>
<u>6</u>	<u>£65,601 to £93,000</u>	<u>9.90%</u>	<u>4.95%</u>
<u>7</u>	<u>£93,001 to £109,500</u>	<u>10.50%</u>	<u>5.25%</u>
<u>8</u>	<u>£109,501 to £164,200</u>	<u>11.40%</u>	<u>5.70%</u>
<u>9</u>	<u>£164,201 or more</u>	<u>12.50%</u>	<u>6.25%</u>

4) Automatic Enrolment (AE) earnings trigger 2020/2021

The AE earnings trigger for 2020/21 will be £10,000. This is the same as 2019/20. The Government confirmed this in a [written statement on automatic enrolment](#) to Parliament on 13 February 2020. It will lay legislation following the February recess to that effect.

5) The Pensions Regulator (TPR) seeks to extend supervision to select administrators

TPR is seeking a voluntary extension to its supervision regime. This has already been introduced for the largest schemes in the UK. It will attempt to build relationships with pensions administrators of critical importance. These are the top 75 outsourcing companies and in-house teams in the country.

Key areas of focus for interaction will include:

- trustee relationship management
- handling of client transitions
- data quality controls
- due diligence on scams
- member communications
- resourcing and training
- business continuity and cyber resilience.

TPR is hopeful that a final list could be ready by the end of 2020.

6) 2020 Public Service Pension Scheme (PSPS) Indexation and Revaluation

On 25 February 2020, the Government made a written statement on indexation and revaluation. The statement confirms that the following LGPS benefits will both increase by 1.7% In April 2020:

- pensions in payment, and
- active member career average benefits.

The statement also confirms the increases that will apply to career average benefits in other Public Service Pension Schemes:

- Police Pension Scheme: 2.95%
- Firefighters' Pension Scheme: 4%
- Civil Service Pension Scheme: 1.7%
- NHS Pension Scheme: 3.2%
- Teachers' Pension Scheme: 3.3%
- Armed Forces Pension Scheme: 4%
- Judicial Pension Scheme: 1.7%.

7) LGPS National Knowledge Assessment (NKA)

Hymans Robertson have launched their NKA. This follows their first ever LGPS National Confidence Assessment (NCA). The assessment will look at the knowledge levels of key decision makers. Key decision makers are Pension Committee (PC) and Pension Board (PB) members. By participating in the assessment, each administering authority will receive:

- their own results report
- Hymans Robertson analysis and suggested next steps
- their benchmarked position against other LGPS administering authorities
- a recommended training plan tailored for their PC and PB.

Following the assessment, Hymans Robertson will publish a National Report. This will contain commentary and analysis on the current LGPS PC and PB landscape. Hymans Robertson will send an invitation to all administering authorities in March 2020. Completion of the survey will take 15 to 20 minutes for each PC or PB member. Hymans have announced an extension to the NKA, which will now continue into May 2020. For further information, please contact marketing@hymans.co.uk.

8) Employment tribunal makes interim declaration in favour of firefighters

The Fire Brigades Union won a landmark victory which allowed members of the 1992 and 2006 firefighters pension schemes in England and Wales to be treated as if they had remained members of their original pension scheme. The decision was an interim declaration covering immediate cases such as members who have taken ill-health retirement, the final declaration is expected in July 2020 but it may be some time before this part of the remedy can be put into effect for all claimants.

Some members of the Firefighters' Pension Scheme may have been better off in the new CARE scheme and would suffer a detriment if they simply moved back to the old schemes, so the government's intention is to ensure that such persons can keep the benefits they have accrued.

A consultation will be issued in the Spring on the exact remedy for the unfunded public sector schemes.

The ruling could result in other public sector staff being returned to their original pension schemes. One possible remedy for the LGPS is that the underpin is extended so affected member gets the best of either the CARE or Final Salary benefits. Funds should be preparing a strategy to contact employers and ideally giving them sufficient warning that requests for McCloud/Sargeant.

Whilst there is uncertainty over what the eventual remedy will look like for the LGPS, what is more certain is the fact that the major pain is going to be felt in an administrative sense. It's almost certain that Funds will need to collect data for virtually all members who joined the scheme prior to 2014 and left after 2014, input that information into the administration system and then deal with any recalculations that are required.

9) Obtaining IRMP opinions during the pandemic

LGA have queried the position about obtaining opinions from Independent Registered Medical Practitioners (IRMPs) during the current crisis with the Association of Local Authority Medical Advisers (ALAMA), who confirmed that ill health applications should continue to progress during the pandemic. The following statement has been published on the ALAMA website:

“During the current COVID-19 crisis, it is important to continue to progress ill health retirement applications. It is also particularly important that assessments remain fair and reasonable, and that should include requesting GP and specialist reports as required. There has never been a requirement for these assessments to be face to face, therefore paperwork reviews, with telephone clarification if needed, is the most appropriate way to progress these.

If it is not possible to get reports, an assessment should be based on whether reports are likely to influence your decision further, and whether you have enough objective evidence to make an opinion. Opinions should always be ‘on balance of probability’. There will be times when you simply don’t have sufficient objective evidence to support ill health retirement, and you have been unable to get clinical reports. You should suggest that the applicant requests copies of clinical reports direct from their GP.”

Employers and administering authorities may experience delays in obtaining an IRMP’s opinion in relation to an ill health retirement application or a Tier 3 ill health review. Any such delay could affect the date from which an ill health pension is payable, or the date that a Tier 3 pension is upgraded to Tier 2. To help them make their decisions, employers and administering authorities may wish to ask IRMPs to include in their report information about any delays due to COVID-19 that have affected the member’s application.

10) Death in service guarantees for frontline COVID-19 staff

The Department of Health and Social Care issued a press release on 27 April 2020 about a new guaranteed life assurance scheme for frontline health and care workers in England. Families of eligible workers in England who die from coronavirus will receive a £60,000 payment, funded by the Government. Full details of the scheme are not yet available. We understand that any payment would be in addition to death in service benefits payable in respect of care workers who are also LGPS members.

11) Cash flow survey

The cash flow survey conducted by the LGA show that a small minority of funds anticipate issues due to loss of dividend income or delayed employer contributions. Any new issues identified in the survey responses that are not covered in existing regulations have been referred to the new SABEW practitioner advisory group and/or Government to consider. You can read a summary of the cash flow survey responses on the SABEW website.

12) Job retention scheme

Employers can now claim for wages through the Coronavirus Job Retention Scheme on the Government website. On 15 April 2020, the Chancellor made a Treasury Direction under the Coronavirus Act which sets out the legal framework for the Scheme. The Schedule to the Direction confirms that HMRC is responsible for making payments and managing the amounts of payments under the Scheme.

On 17 April 2020, HMRC published guidance on working out how much to claim through the Job Retention Scheme.

On 24 April 2020, the Government announced that furloughed workers will receive full parental leave entitlement. On the same date, The Maternity Allowance, Statutory Maternity Pay, Statutory Paternity Pay, Statutory Adoption Pay, Statutory Shared Parental Pay and Statutory Parental Bereavement Pay (Normal Weekly Earnings etc.) (Coronavirus) (Amendment) Regulations 2020 [SI2020/450] were laid. The purpose of these new Regulations is to make sure workers who take family-related leave are not worse off because they have been furloughed

13) Supreme Court Judgment on LGPS boycotts

On 29 April 2020, the Supreme Court handed down its judgment in the case of R (on the application of Palestine Solidarity Campaign Ltd and another) (Appellants) v Secretary of State for Housing, Communities and Local Government (Respondents). The case was originally heard on 20 November 2019. The Supreme Court found in favour of the appellants and would appear to take the position that the Government has the power to direct authorities on the approach they take to investment decisions, but not on the investments they make.

[A summary of the judgment \(PDF 180kb\)](#) published by the practice at 11KBW is available. Please note that this summary represents the views of 11KBW and not the SAB.

14) **McCloud subgroup meetings**

The SAB has set up two working groups to work with MHCLG in developing and implementing the LGPS McCloud remedy. Due to the current restrictions, Lorraine Bennett, the chair of the implementation group, has formed three subgroups that will meet virtually. The subgroups are made up of representatives from employers, administering authorities, pension administration software suppliers, unions, actuarial firms, NILGOSC and the LGA.

Data collection: the data collection subgroup held their first virtual meeting on 22 April 2020. In order to implement the McCloud remedy, most administering authorities will need to gather service information from 1 April 2014 (2015 in Scotland) for members in scope of protection from employers. The group will produce a data collection template for employers and payroll providers to use to supply that information. To ensure the message to employers remains consistent, the group will draft key bullet points for administering authorities to include within their employer communications.

Communications: the communications subgroup met on 24 April 2020. The group will produce templates for administering authorities to use to request service data from employers. The group agreed that their priority is to produce communications for members that explain the scheme changes and make it clear that they do not need to make a legal claim, they will get the protection they are entitled to automatically.

Software: the software subgroup will consider what system changes are needed to implement the remedy.

15) **Regulations extend accounting deadlines**

The Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 [SI2020/404] come into force on 30 April 2020. The Regulations extend the publication date for local authority audited accounts to 30 November 2020. The public inspection period will start on 1 September 2020. The Government has published an Explanatory Note to accompany the regulations.

There are no plans for an automatic extension to the publication date for LGPS fund reports and accounts. MHCLG will keep this matter under consideration. Please email query.lgps@local.gov.uk to inform us of any issues arising from these regulations.

16) **Temporary changes to pensions tax for returning workers**

Members of certain public service pension schemes retain the right to retire (in normal health) before age 55. Under normal circumstances, rules covering reemployment must be followed if the pension and lump sum payments are to be considered authorised. Protected pension ages and re-employment are covered in Part 3 of Schedule 36 to the Finance Act 2004.

John Glen, the Economic Secretary to the Treasury issued a [written statement on temporary changes to pensions tax](#) on 22 April 2020. The statement confirms that the Government intends to 'temporarily suspend tax rules that would otherwise apply significant tax charges to pension income received by recently retired

individuals aged between 50 and 55'. The measure will only apply to those people returning to work as a result of COVID-19. HMRC have provided more information about this change in [Pension schemes newsletter 119](#).

Although we expect that these provisions will mainly affect employees returning to the NHS, it is possible that employees who recently retired from a 'uniformed' role who return to employment, including in a civilian role, in the fire or police service could be affected.

17) TPO

TPO COVID-19 update

The Pensions Ombudsman (TPO) was providing a restricted service due to the pandemic. TPO have announced that from 22 April 2020 they will accept new applications by email, and that their phone lines are open from 9am to 5pm Monday to Friday. TPO will not have access to correspondence sent by post during the lockdown period. Please be aware that TPO response times may be longer than usual.

18) TPR

COVID-19: member communications and transfer warning

The Pensions Regulator (TPR) published guidance on [communicating to members during COVID-19](#) on 29 April 2020. The guidance covers information we have included on our website, emails and standard correspondence about changes to our service delivery and response times.

The guidance emphasises the importance of supporting members to make an informed decision when they are considering a pension transfer.

TPR recognises that members are at risk of making decisions that reduce the value of their pensions, or of losing them entirely to pension scams during the current crisis. On 29 April 2020, the Pensions Regulator (TPR) announced that [Pension schemes are to issue a COVID-19 transfer warning](#) to members considering transferring from a defined benefit to a defined contribution pension during the crisis.

TPR, working with the FCA and the Pensions Advisory Service, has produced a [letter template \(PDF, 171kb\)](#) to issue to members requesting a CETV quote. The letter as currently drafted includes references to the Pension Protection Fund (PPF) and its role in paying pensions when employers become insolvent. This does not apply to the LGPS and could confuse members. We have requested that TPR supply a version of the letter for public sector schemes that does not include any references to the PPF. We will publish this public sector version as soon as it is available. In the meantime, administering authorities may choose not to send the template letter, or to send it with an explanation that the references to the PPF do not apply.

TPR has also requested that:

“You should actively monitor the number of requests for CETV quotes you receive and which advisers are supporting members' requests. If you identify unusual or concerning patterns, such as spikes in CETV requests or the

same adviser across a multitude of requests, please contact the FCA at DBTransferSchemeInformation@fca.org.uk.”

19) Other COVID-19 guidance

TPR has published useful guidance for pensions administrators and employers covering issues affected by COVID-19. Visit [COVID-19: What you need to consider](#) to find out more about the TPR guidance.

On 9 April 2020 TPR published the following guidance:

- [Automatic enrolment and DC pension contributions](#). Although not aimed at defined benefit pension schemes such as the LGPS, the guidance confirms that there is no change in employers’ responsibilities under automatic enrolment rules. The guidance also includes a reminder that employers must not encourage staff to opt out of the scheme or pay reduced contributions.
- [An update on reporting duties and enforcement activity](#). The update provides more detail about the flexible approach that TPR will adopt in response to certain breaches during the COVID-19 pandemic. The easements will remain in place until 30 June 2020, but this may be extended

20) MaPS provide a pensions dashboard update

On 8 April 2020, the Money and Pensions Service (MaPS) published Pensions Dashboard Programme – Progress Update Report. The MaPS intends to release a progress report every six months. The first report sets out:

- the pensions dashboards goals and some of the challenges associated with delivery
- that Primary legislation will provide certainty about the requirements placed on schemes and the timescales for compliance
- the importance of secure and accurate identity verification
- the challenge of specifying a consistent set of data standards so that information from different schemes can be displayed consistently
- the need to identify when in the staged onboarding process the dashboards should be made available to the public¹¹
- the focus of the Pensions Dashboards Programme over the coming months.

The MaPs published two further papers in April 2020. Pensions Dashboards Data Definitions – Working Paper lists the set of data items that could be included in the dashboards data standards. This covers both data items that are needed to find a member’s pensions and those that would be useful for users to see on a dashboard. The list will be developed further in response to user and sector research. Options for achieving early breadth of coverage are considered in Pensions Dashboards Data Scope: Working Paper. This paper confirms that initial dashboards will only include information that is already available on annual statements. This should enable the maximum number of pension schemes to onboard at an early stage. More information is likely to be included in pensions dashboards in the future.

The MaPS will be asking for formal feedback at a later stage and welcomes informal feedback from stakeholders now.

21) New procurement framework for pensions administration software

The National LGPS Frameworks launched the Pensions Administration Software Framework on 27 April 2020.

The following providers have been appointed to the National LGPS Framework for Pensions Administration Software:

- Aquila Heywood Ltd
- Civica UK Ltd
- Equiniti.

You can access further information about the framework on the National LGPS Frameworks website. If you need more details about the framework or would like to see copies of the supporting documentation, please contact NationalLGPSframeworks@norfolk.gov.uk.

22) Unions file court proceedings over cost control mechanism 'pause'

Four unions including the FBU and the GMB have filed court proceedings against the Government. They claim that the pause in the cost control mechanism is unlawful. The 2016 valuation found that the cost of providing public service pension schemes was below target. The unions are arguing for an improvement in member benefits as a result of the valuation results.

In January 2019, the Government announced a pause in the cost control mechanism process due to the McCloud decision. The Government plans a new valuation once the remedies to remove the age discrimination have been finalised and the true cost of providing public service pension schemes can be assessed.

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**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pensions Board
Date:	16 July 2020
Subject:	Data Scores

Summary:

This report updates the Board on the Data Scores for Lincolnshire Pension Fund reported to The Pensions Regulator as required under this year's TPR returns.

Yunus Gajra, the Business Development Manager from WYPF, will update the Board.

Recommendation(s):

That the Board note the report and the Data Improvement Plan.

1.0 Background

1.1 Pension schemes are required by the TPR to report their common and scheme specific data scores in the annual scheme returns.

1.2 The current Data Scores for LPF are:

Common	95.90%
Scheme Specific	76.76%

1.3 This is a slight improvement on the scores measured in March which were:

Common	95.87%
Scheme Specific	63.08%

2.0 Data Issues

2.1 Missing Addresses

There are 2,987 address's missing for deferred members. This is a reduction of 144.

WYPF have a programme of tracing lost contact members on a rolling programme.

2.2 Missing Earnings

There are 791 records with missing earnings. This is a reduction of 343. The majority of cases are awaiting leaver/pensioner benefits to be calculated.

2.3 Missing CARE Benefits

There are 325 records with missing Career Average Revalued Earnings (CARE). This is a reduction of 189. These are cases where leaver forms are outstanding from the Employers or where they have been received by WYPF but benefits not yet calculated.

2.4 Missing CARE Rates

There are 15 cases where the revaluation rate is missing from the member's record. This is an increase of 8. These are cases where leaver forms are outstanding from the Employers or where they have been received by WYPF but benefits not yet calculated.

2.5 Start Date Inconsistency

There are 5151 records where the start date on the record

2.7 No National Insurance Contributions or GMP

There are 12673 records with missing National Insurance contributions or GMP. It appears that the report does not correctly pick up the GMP amount held on the record where there is no national Insurance contribution history. WYPF will refine the report.

2.8 Missing Crystallisation Details

There are 510 records with missing benefit crystallisation details. This is legacy data that was not supplied by the previous administrator. WYPF will obtain this information from the files to complete the records.

2.9 Missing Annual Allowance Calculation

There are 1070 records with missing annual allowance calculation. This is a reduction of 1845 and is connected to legacy data that was not supplied by the previous administrator. WYPF will review this requirement as only 3 years records are required for carry forward of unused allowance.

2.10 No Total Exit GMP (Deferred)

There are 4885 records with missing National Insurance contributions or GMP. It appears that the report does not correctly pick up the GMP amount held on the

record where there is no national Insurance contribution history. WYPF will refine the report.

2.11 No Post 88 GMP on record

There are 4047 records with missing National Insurance contributions or GMP. Similar to above, it appears that the report does not correctly pick up the GMP amount held on the record where there is no national Insurance contribution history. WYPF will refine the report.

3.0 Data Improvement Plan

- 3.1 As a result of the data scores WYPF has devised a Data Improvement Plan (Appendix A) which identifies the issues with the data and the resolutions required to resolve those issues.
- 3.2 The reports to measure the data scores will be run at least on a quarterly basis to measure the improvements in data scores and identify any new issues.
- 3.3 It should be noted that TPR do not expect scores to be 100%, as long as there is a Data Improvement Plan to address the data issues. For example, as we trace members, others are identified as lost contact through returned mail. WYPF also takes every opportunity to remind members to tell us when they move house.

4.0 Conclusion

- 4.1 Data quality is important to the Fund as, as well as being a requirement of the Pensions Regulator. It may affect the employer contributions at the next valuation and can impact on the reputation of the Fund.
- 4.2 The Fund continually reviews the quality of data held throughout the year and strives to keep this as complete, accurate and up to date as possible. The Pensions Regulator requires Funds to undertake a review of data quality at least annually and this report consolidates the work undertaken in compliance with this requirement.
- 4.3 This report concludes that, whilst data quality is considered to be good within the Fund, there are improvements that can be made and as a result a data improvement plan has been developed.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Data Improvement Plan

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the Pensions Manager.

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Yunus Gajra, who can be contacted on 01274 432343 or Yunus.gajra@wypf.org.uk.

Lincolnshire Pension Fund

Data Improvement Plan 2019/20

1. Introduction

- 1.1 This document defines the data improvement plan for Lincolnshire Pension Fund which is administered by West Yorkshire Pension Fund (WYPF) under a shared service arrangement.
- 1.2 WYPF collects and holds large amounts of digital and paper based data and is heavily reliant on the timely receipt of quality data from employers, in order to effectively administer the Local Government Pension Scheme (LGPS).
- 1.3 Fundamentally, the purpose of the LGPS is to pay the correct pension benefits to its members when they become due. It is therefore imperative that the highest possible data quality standards are maintained, to comply with this core function and to ensure the cost effective use of resources.
- 1.4 The LGPS continues to face ongoing legislative change with oversight of administration and governance now falling under the remit of the Pension Regulator, with a heightened responsibility on scheme managers and local pension boards to ensure data is readily available and fit for purpose at all times.
- 1.5 The legal requirements relating to scheme record keeping are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014.
- 1.6 The Pension Regulators (tPR) guidance requires that schemes should:
- Continually review their data and carry out a data review exercise at least annually
 - Where a review of the scheme's data identifies poor or missing data a data improvement plan should be put in place to address these issues

2. The Pension Regulator Annual Scheme Return

- 2.1 Annually the Pensions Regulator (tPR) issues a scheme return which should be completed and returned. From 2018 each Pension Fund is required to include in the return a Data Quality Score which has two types of data:
- **Common data** – used to identify scheme members and includes name, address, national insurance number and date of birth.
 - **Scheme-specific data** – essential to calculate benefit entitlement such as pensionable pay and service history. It also encompasses data relating to events that occur during an individual's membership, for example transfers etc.
- 2.2 TPR has issued a quick guide on measuring scheme data which states that one piece of missing data, such as a current address on a deferred member's record should be reported to them as a failed record.

3. Key Objectives

The key objectives of this plan are to:

- Ensure member, pensioner, deferred and beneficiary records are maintained as accurately as possible to ensure benefits are paid correctly on time, members receive a high standard of service and the fund is able to meet legal obligations.
- Ensure Investment and Administration costs are reliable/correct.
- Ensure data supplied to the Fund's actuary for the valuation is as accurate as possible so the correct liabilities can be calculated.
- Ensure the Fund complies with tPR's Code of Practice.

4. Outcomes

Outcomes of an improvement in the data held by the administrator are:

- Improvement of tPR data score for Common and Scheme Specific (also known as conditional) data.
- Increase in the number of Annual Benefit Statements (ABS) issued by 31 August each year./members aware of the value of their benefits.
- Reduction in the number of Internal Dispute Resolutions (IDRPs) received for incorrect calculation of benefits or delays in paying benefits.
- Reduction in the number of queries from the Fund's Actuary at valuation time.
- Reduction in the number of queries received when ABS are sent out.
- Reduction in administration costs due to increased efficiency.
- Reduces the likelihood of the Government Actuary Department rejecting data for the scheme valuation.
- Improves accuracy for IAS19 valuations.
- Reduction in delays for calculating and paying retirement benefits, death benefits, transfers out.
- Reduction in the queries between WYPF and Employers
- Reduction of breaches recorded on the Breaches Register (e.g. due to ABS being issued late).

5. Additional general responsibilities relating to Data Improvement as follows:

5.1 WYPF Officers

- WYPF officers continually review and ensure data collected is fit-for-purpose and processes are in place to monitor accuracy and timeliness. All processes have working instructions in place to assist with staff training, understanding and compliance.
- Team Managers are responsible for ensuring that staff have the appropriate level of UPM access to fulfil their duties and access is withdrawn upon the member of staff leaving WYPF. This minimises the risk of accidental loss, errors and unauthorised activity.

5.2 Scheme Employers

- WYPF is reliant upon the accuracy, completeness and timeliness of data submitted by scheme employers and any third party agencies that they may utilise e.g. outsourced payroll providers.
- WYPF will work with scheme employers throughout the year to support the provision of data to the required standard.
- Details of the information employers are required to provide and the financial penalties should they fail to do so are detailed in the Fund's Pensions Administration Strategy.

6 Ongoing Data Cleansing

6.1 Monthly Returns data quality checks

WYPF embraced monthly contribution postings several years ago with the aim of simplification, systems integration, increased data accuracy and complete up to date member records. The benefits include ensuring that employee's contributions, member's personal details, and financial records are up to date, accurate and complete.

6.2 LGPS National Insurance Database

Administered by South Yorkshire Pension Fund Authority on behalf of the Local Government Association (LGA), the secure National Insurance Database was developed for Local Government Pension Scheme (LGPS) administering authorities to share data to prevent duplicate payment of death grants. This follows changes to Scheme Regulations in 2014 where payment of a death grant in respect of a member with entitlement across multiple membership categories is restricted to an aggregate payment value in relation to any active or pensioner/deferred membership. When processing the death of a scheme member, officers will check the LGPS National Insurance Database for the existence of membership at other LGPS Funds. (Please note not all LGPS administrators are part of this database).

6.3 'Tell Us Once' Service

The secure LGPS National Insurance Database also facilitates the integration of the Fund's membership profile into the Department of Work and Pensions (DWP) 'Tell Us Once' service (TUO). The service allows a person registering a death to request that the DWP pass on the deceased's information to other government services and council services. If the deceased is a member of the Fund, as determined by the LGPS National Insurance Database, an email notification is received informing the designated officers that a copy of the death certificate is accessible on the secure government gateway.

6.4 National Fraud Initiative

The National Fraud Initiative (NFI) matches electronic data within and between public and private sector bodies to prevent and detect fraud. These bodies include police authorities, local probation boards, fire and rescue authorities as well as local councils and a number of private sector bodies. WYPF submit data to National Fraud Initiative on a regular basis to identify deceased members and members who are no longer entitled to receive a pension.

6.5 Mortality screening and tracing service

WYPF engage with a Tracing Bureau for both monthly mortality screening and for members we don't have a current address for. For deferred members, where a current address for a lost contact cannot be found by the Tracing Bureau, a more detailed check is carried out 3 months before payment of pension is due.

6.6 Annual Benefits Statement (ABS) checks

Before producing an ABS each year certain checks are applied to active records to ensure accurate data is used in the production of the ABS. These checks include:

- Ensuring contributions are received for every month during the year,
- Checks to make sure there are no spikes in care pensionable pay,
- Checks to ensure the final pay has not increased by 20% or decreased by 10%,
- Checks to ensure there aren't any outstanding processes,
- Address check to compare the address held on the record and that supplied on the monthly return,
- Identifying casual workers.

If these checks identify further information is required from an employer the ABS production for this case will be blocked and a query will be referred back to the employer. Upon receipt of the appropriate information the record will be updated and the ABS will be released for production.

6.7 Deferred pensions increase

As part of the annual deferred pensions increase process certain data errors are identified and pensions increase is blocked until they are resolved. These errors include:

- Incorrect elements present,
- Spouse elements that don't match member elements,
- Incorrect dates for the first entry after the member is deferred,
- Data errors are corrected to allow deferred pensions increase to run on to individual deferred folders.

6.8 Annual deferred benefit statements

Before producing the annual deferred benefit statements data errors that would result in potentially incorrect statements being produced are identified. These include:

- Deferred pensions increase not updated
- Multiple 'normal payment' dates being held on the deferred folder
- Multiple entries for the same date shown on the pension history screen
- Initial entries on the pension history missing
- Service start date mismatches

Once these errors are resolved and the records is updated the deferred ABS will be released for production.

7 Data errors

When tackling data errors the following considerations will be used when making the decision on the priority of errors to be resolved:

- Priority identified on the error report
- Data improvement plans objectives

8. Frequency

Data Quality reports will be run on a quarterly basis to measure the data quality scores and identify any further action that may be required.

9 Appendices

- Appendix 1 details the Data Quality scores and errors
- Appendix 2 details to work planned to deal with the data errors identified.

Appendix 1 - Lincolnshire Pension Fund results at November 2019

	Nov-19	Mar-20	May-20	Aug-20
TPR Score - Common	95.72	95.87	95.90	
TPR Score - Conditional	47.93	63.08	76.76	

Breakdown of activities for improvement

	Nov-19	Mar-20	May-20	Aug-20
Count of Missing, Bad or Temp NI Number	81	81	75	
Count of Bad Date of Birth	1	1	1	
Count of Address Missing	3,041	3,007	2,987	
Count of Postcode Missing	27	27	27	
Count of No Date Joined Scheme	14	13	0	
Count of No Folder Status History	10	10	0	
Count of Folder Status/ Status History Mismatch	50	50	51	
Count of Multi Folder Status History Entries on Same Day	61	48	49	
Count of Missing or Bad Expected Retirement Date	5	4	4	
Count of No Folder Scheme History	68	66	62	
Count of no NI contributions or GMP	12,801	12,715	12,673	
Count of no Date of Leaving	1	2	2	
Count of missing benefit crystallisation record	39	39	39	
Count of missing benefit crystallisation details	480	501	510	
Count of Missing Date Joined Employer	2	2	0	
Count of Missing Earnings	1,159	909	791	
Count of Invalid Transfer In Present	160	157	156	
Count of Invalid AVC Data for member	65	64	47	
Count of Invalid Part Time Service Present	64	64	63	
Count of Missing CARE Benefit	517	407	325	
Count of Missing CARE Revaluation Rate	5	5	15	
Count of Invalid Contracted Out Date	20	20	20	
Count of Missing Initial Pension (Def)	62	58	55	
Count of Missing Initial Care Pension (Def)	212	177	154	
Count of Missing current Pension	7,218	1,932	1,895	
Count of Missing CARE Initial Pension	27	30	30	
Count of missing annual allowance calculation	2,871	11,031	1,070	
Count of start date inconsistency	5,278	5,188	5,151	
Count of deferred – No total exit GMP	4,911	4,858	4,885	
Count of No post 88 exit GMP	4,076	4,046	4,047	

Data Category	Category	Priority	Resolution required	Responsibility	Progress	Deadline
Missing Ni Number	Common	Low	Ni number to be identified where possible	Service Centre /Comms	Ongoing	Ongoing
Date of Birth	Common	Medium	Interrogate record	Service Centre		Nov 21
Address and postcode	Common	Medium	Actives – Contact employer	Comms		Nov 21
			Deferreds and preserved refunds use tracing agency	Service Centre	Rolling programme	Rolling program
No date joined scheme	Common	Medium	interrogate records and/or obtain information from employer	Service Centre	Completed	Nov 21
No folder Status history	Common	Low	Interrogate record	Service Centre	Completed	Nov 22
Folder Status/ Status History mismatch	Common	Medium	Review cases as it appears they might be changes to folder status from monthly postings?	Finance		Nov 21
Multi folder Status history entries on Same day	Common	Low	Need to look at each case as it appears they might have moved onto 2 status on the same day	Service Centre		Nov 22
Missing or bad expected retirement date	Common	Low	Bulk Update	IT		Nov 22
No folder scheme history	Common	Medium	Interrogate records	Service Centre		Nov 21
Missing Date joined employer	Scheme Specific	Low	Interrogate records possible intrafunds	Service Centre	Completed	Nov 22
Missing earnings	Scheme specific	High	Majority Awaiting leaver/pensioner benefits to be calculated in Service Centre	Service Centre	Ongoing	Deal with in accordance with KPI targets
Invalid part time service present	Scheme specific	Low	Interrogate record	Service Centre		Nov 22

Data Category	Category	Priority	Resolution required	Responsibility	Progress	Deadline
Missing CARE benefit	Scheme specific	High	Majority Awaiting leaver/pensioner benefits to be calculated in Service Centre	Service Centre	Ongoing	Deal with in accordance with KPI targets
Missing CARE revaluation rates	Scheme specific	High	Majority Awaiting leaver/pensioner benefits to be calculated in Service Centre	Service Centre	Ongoing	Deal with in accordance with KPI targets
Invalid contracted Out date	Scheme specific	Low	Interrogate record	Service Centre		Nov 22
Missing initial pension (DEF)	Scheme specific	Low	Possible bare EPB cases. To interrogate and sample records	IT		Nov 21
Missing Initial CARE Pension(DEF)	Scheme specific	Low	Interrogate record Spot check a number of cases as it might be where member joined right at the end of the year and no care benefits	Service Centre	Ongoing	Nov 21
Missing CARE initial Pension	Scheme specific	Low	Interrogate record	Service Centre		Nov 22
Missing NI contributions or GMP	Scheme specific	Medium	IT to refine the report	IT		Nov 20
Missing Date of Leaving	Scheme specific	Low	Interrogate record	Service Centre		Nov 22
Missing benefit crystallisation record	Scheme specific	Low	Interrogate records	Service Centre		Nov 21
Missing benefit crystallisation details	Scheme specific	Medium	It to consider bulk update	IT		Nov 20
Invalid AVC Data for member	Scheme specific	Low	Interrogate records	Service Centre		Nov 22
Invalid Part Time service present	Scheme specific	Low	Interrogate record	Service Centre		Nov 22

Data Category	Category	Priority	Resolution required	Responsibility	Progress	Deadline
Missing current pension	Scheme specific	Medium	ITt to refine the report	IT		Nov 20
Missing annual allowance	Scheme specific	Low	IT to consider if a bulk update can be done	IT		Nov 22
Start date inconsistency	Scheme specific	Low	IT to consider if a bulk update can be done	IT		Nov 22
Deferred – No Total exit GMP	Scheme specific	Low	IT to review the report	IT		Nov 20
No post 88 exit GMP	Scheme specific	Low	IT to review the report	IT		Nov 20

This improvement plan primarily aims to address the key issues identified from the Funds Data Quality review and data quality score and details the plans in place to improve the data we hold.

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**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pensions Board
Date:	16 July 2020
Subject:	Temporary Bank Accounts

Summary:

This report updates the Board on the number of temporary bank accounts created by WYPF to hold monies due to beneficiaries of the scheme.

Yunus Gajra, the Business Development Manager from WYPF, will update the Board.

Recommendation(s):

That the Board:

1. Note the report; and
2. Consider moving the frequency of reporting on Temporary Bank Accounts to bi-annually.

1.0 Background

- 1.1 For a number of years, WYPF have set up a number of temporary bank accounts with HSBC for deferred or pensioner beneficiaries who appear to be entitled to a pension scheme benefit but for whom we have lost contact with.
- 1.2 Under the current scheme rules members who are entitled to a refund are required to claim the refund within 5 years of leaving. WYPF has a number of members who have not claimed the refund within the 5 year period. As a result temporary deposit accounts have been set up for these members. Late claims will then be released from the account and paid to the claimant.
- 1.3 The payment into a temporary bank account means that the Fund has discharged its liability and the member is not faced with an unauthorised tax charge if they were to claim their benefits late.
- 1.3 The Pensions Board have asked for the number of temporary accounts held and the amount of money held in these accounts.

2.0 Lost Contact Pensioners/Deferreds

2.1 The number of temporary deposit accounts held for this category of members is has increased to 53 from the previous figure of 50.

Total number: 53

Current amount held in accounts: £29,498.47 a reduction from £51,743.84 previously held.

3.0 Post 2014 Preserved Refunds

3.1 The number of temporary deposit accounts held for this category of members has increased to 136 from 87:

Total number: 136

Current amount held in accounts: £11,648.37, an increase from £6,080.08 previously held.

3.2 This is an increase of 49 reported at the last Pensions Board, and is expected as more and more members come up to their five year deadline. However, the National Technical Group has contacted the Scheme Advisory Board to request a change in the LGPS Regulations 2013 to remove the requirement for a refund to be paid within five years. A response is still awaited.

3.3 A full breakdown of the number of accounts opened and closed is shown at Appendix 1.

4.0 Tracing

At least on an annual basis WYPF review the bank accounts and carry out further traces to see if the member can be located. This can be through the national Fraud Initiative, using a tracing agency or other means such as death notifications, member contacting us etc.

5.0 Conclusion

5.1 Payments into a temporary bank account are made when all tracing options are exhausted and means that the Fund has discharged its liability and the member is not faced with an unauthorised tax charge if they were to claim their benefits late.

5.2 The accounts are regularly monitored and closed where members are located or confirmation received that they have died.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Deposit Account Summary

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the Pensions Manager.

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Yunus Gajra, who can be contacted on 01274 432343 or Yunus.gajra@wypf.org.uk.

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Lincolnshire LGPS Deposit Accounts - Summary

Up to 29 June 2020

STG1 - Pensioner/Beneficiary

Currently Open

No. of Deposit with Credit Balances	53
Total Credits	29,498.47

Currently Open

No. of Deposit with Credit Balances	136
Total Credits	11,648.37

Opened Accounts

2020/21	7
2019/20	26
2018/19	34
2017/18	66
2016/17	11
2015/16	4

Opened Accounts

2020/21	29
2019/20	130

Closed Accounts

2020/21	2
2019/20	39
2018/19	22
2017/18	27
2016/17	4
2015/16	0

Closed Accounts

2020/21	13
2019/20	10

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**Open Report on behalf of Andrew Crookham,
Executive Director – Resources**

Report to:	Lincolnshire Pensions Board
Date:	16 July 2020
Subject:	Employer Monthly Submissions Update

Summary:

This paper provides the Board with up-to-date information on Employer Monthly Submissions for the final quarter of the financial year 2019/20 (January to March).

Recommendation(s):

The Board note the report and consider if there are any further actions they wish to take against employers submitting late or inaccurate payments or data.

Background

- 1 There are just over 270 employers within the Lincolnshire Pension Fund. All employers have a statutory responsibility, as set out within the Pensions Act 1995, to ensure that they pay over contributions due to the Fund on a timely basis. The date these are due is set out in the Fund's Administration Strategy, which all employers sign up to, and has been set as the 19th of the month following their payroll. The Fund considers an employer a 'late payer' if either the cash and/or the data is received after this date.
- 2 The Fund has in place robust processes for monitoring the receipt of payments and data from employers. Within the Pensions Team, the Finance Technician is responsible for monitoring employer contributions monthly. Additional checks on the detailed data submissions and employer rates are undertaken by the West Yorkshire Finance Team. The pensions system itself also identifies errors, queries, or where further information is required from the employer (e.g. additional leavers' information).
- 3 After any late payment (including data submission) an email is sent to the employer reminding them of their responsibilities. In addition to emailing employers, both the Lincolnshire and West Yorkshire Pension Fund teams are in regular contact with employers and their payroll providers to prompt payments/data submissions and clarify any queries. Much work has been put into building a good relationship with the employers and payroll providers, to assist in understanding the process and the data required.

- 4 A summary of all late contributions or data submissions since April 2019 is set out in table one below.

Table One: Late contributions and data submissions to March 2020

Month	Payment of Contributions		Submission of Data	
<i>April</i>	6	2.3%	14	5.3%
<i>May</i>	3	1.1%	10	3.8%
<i>June</i>	3	1.1%	23	8.7%
<i>July</i>	9	3.4%	15	5.7%
<i>August</i>	6	2.3%	12	4.5%
<i>September</i>	3	1.1%	11	4.2%
<i>October</i>	2	0.7%	6	2.2%
<i>November</i>	3	1.1%	15	5.6%
<i>December</i>	3	1.1%	11	4.1%
January	1	0.4%	8	2.9%
February	4	1.5%	9	3.3%
March	1	0.4%	9	3.3%
Total for 2019/20	44		143	

- 5 The analysis shows the number of employers making late contributions is a relatively small percentage of the overall number of employers. A higher number of employers submitted their data returns late, or have made an incorrect submission by the deadline date (i.e. their data contains errors, or does not agree to the contributions paid across). The last quarter of the year has seen a reduction in the number of late submissions, even in light of the Covid-19 pandemic affecting February and March submissions. It appears that most employers have been able to successfully submit data and make payment to the Fund despite the challenges the pandemic has caused to working arrangements.
- 6 None of these breaches individually have been material and therefore have not been reported to the Pensions Regulator; however, they have been included en masse in the breaches register.
- 7 If any employer makes contribution payments or submits data late in three out of six months on a rolling basis, they will receive a fine, unless they are able to offer extenuating circumstances. Fines are currently set at a minimum of £136. Table two below sets out the number of fines issued since April 2019. There have been no fines issued in the quarter January to March 2020.

Table Two: Late contributions fines to March 2020

<i>April</i>	<i>May</i>	<i>June</i>	<i>July</i>	<i>August</i>	<i>September</i>
2	2	5	4	3	3
<i>October</i>	<i>November</i>	<i>December</i>	January	February	March
0	0	0	0	0	0

Conclusion

- 8 This report provides quarterly monitoring information on the timeliness and accuracy of employer submissions to help the Pensions Board understand if there are any issues arising from late payments or data and any further actions which are required to address employers not meeting their statutory responsibilities.
- 9 Employer submissions have increased in prominence as the number of employers within the scheme has increased. The Fund has responded to this by having a dedicated resource to monitor employer submissions and working closely with West Yorkshire and employers to reduce the numbers of late payers.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Background Papers

This report was written by Claire Machej, who can be contacted on 01522 553641 or claire.machej@lincolnshire.gov.uk.

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**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pension Board
Date:	16 July 2020
Subject:	Lincolnshire Pension Fund Risk Register

Summary:

This report presents the Pension Fund Risk Register and Risk Policy to the Board for annual review. In addition, it presents the Coronavirus Risk Register for consideration.

Recommendation(s):

That the Board:

- 1) review the risk management policy;
- 2) review the risk register; and
- 3) review the Coronavirus risk register.

Background

1. Board members will understand the importance of looking at risk. Given the size and importance of the Pension Fund, it is best practice to have a separate risk register considering the key risks that can impact the Fund and how they can be mitigated, if at all possible. The risk register is reviewed annually at the Pensions Committee and Pension Board, and any additional changes or updates are reported in the quarterly Fund Update reports.
2. The risk management policy, which is a formal record of the Fund's appetite for risk, its risk management structures and its approach to risk management, is attached at appendix A.
3. Appendix B is the Pension Fund risk register. 28 risks have been identified, along with the controls in place to mitigate them. The presentation has been changed to group together risks by type, and risks have been reworded, split or expanded to provide greater clarity.
4. Given the recent unprecedented events resulting from the impact of the pandemic, an additional risk register, relating specifically to risks due to the Coronavirus situation was developed in March. Whilst these are all captured at a high level within the normal risk register, it was felt that it would be useful to expand the risks that were associated with the current

situation. This has been shared with the Board on a monthly basis with updated comments added as appropriate, to provide assurance on the position of the Fund and its management in these uncertain times. The Coronavirus Risk Register is attached at Appendix C.

5. The Fund risk register follows the standard format of the Council’s risk registers. To assist in understanding the risk register, the first risk on the register and the associated columns are described below:

- ID – an identifying number
- Linked to objective – the Fund’s objectives are detailed at the top of the register
- Source – what the risk is
- Consequences – the potential outcomes
- Risk owner – person responsible overall
- Existing controls – what is already in place to reduce either the impact or the likelihood
- Status – the effect that the controls in place have, either good, fair or poor
- Owner – who is responsible for the controls
- Current Risk score – L – Likelihood and I – Impact (explained in the table below)
- Overall Current Risk Score

6. The risk scores are calculated using the risk matrix below:

LIKELIHOOD	4				
	3				
	2				
	1				
		1	2	3	4
IMPACT					

For the **likelihood**, there are four possible scores:

1 HARDLY EVER	2 POSSIBLE	3 PROBABLE	4 ALMOST CERTAIN
Has never happened. No more than once in ten years. Extremely unlikely to ever happen.	Has happened a couple of times in last 10 years. Has happened in last 3 years. Could happen again in next year.	Has happened numerous times in last 10 years. Has happened in last year. Is likely to happen again in next year.	Has happened often in last 10 years. Has happened more than once in last year. Is expected to happen again in next year.

For the **impact**, there are four possible scores, but considered across four areas:

	SERVICE DELIVERY Core business, Objectives, Targets	FINANCE Funding streams, Financial loss, Cost	REPUTATION Statutory duty, Publicity, Embarrassment	PEOPLE Loss of life, Physical injury, Emotional distress
4 CRITICAL Disastrous impact, Catastrophic failure	Prolonged interruption to core service. Failure of key strategic project.	Severe costs incurred. Budgetary impact on whole Council Impact on other services. Statutory intervention triggered.	National media interest seriously affecting public opinion.	Loss of life. Multiple casualties.
3 MAJOR Significant impact, Disruption to core services	Key targets missed. Some services compromised.	Significant costs incurred. Re-jig of budgets required. Service level budgets exceeded.	Local media interest. Comment from external inspection agencies. Noticeable impact on public opinion.	Serious injuries. Traumatic / stressful experience. Exposure to dangerous conditions.
2 MINOR Minor impact, Some degradation of non-core services	Management action required to overcome short-term difficulties.	Some costs incurred. Minor impact on budgets. Handled within management responsibilities.	Limited local publicity. Mainly within local government community. Causes staff concern.	Minor injuries or discomfort. Feelings of unease.
1 NEGLIGIBLE No noticeable impact	Handled within normal day-to-day routines.	Little loss anticipated.	Little or no publicity. Little staff comment.	

- Once the likelihood and the impact are assessed, this produces the overall risk score e.g. likelihood = 3, impact = 2 then the risk score is 6. This means that it would fall into the blue area of the matrix, and is a higher concern than if it were in the green area. The Committee would need to be satisfied that they were comfortable with this level of risk, and that no further controls were required. There will always be some risks that cannot be fully mitigated.

Conclusion

8. It is considered best practice to have identified the high level risks associated with managing a Pension Fund and to have put appropriate controls in place, and to set out a Risk Management Policy and Risk Register. An additional risk register has also been created, specifically to reflect the risks associated with the current pandemic. The latest versions of these are brought to the Pension Board for review.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Risk Management Policy
Appendix B	Pension Fund Risk Register July 2020
Appendix C	Coronavirus Risk Register

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk.

Risk Management Policy

RISK MANAGEMENT POLICY

Lincolnshire County Council, as the Administering Authority of the Lincolnshire Pension Fund (the Fund), is aware that some risks will always exist and will never be eliminated.

Against this background, and within the overall risk strategy of the County Council, the Fund recognises it has a moral and statutory duty to manage risk with a view to protecting its assets and the benefits due to the scheme members, and supporting its employers.

The Fund will meet this duty by adopting best practice risk management (RM) which will support a structured and focused approach to managing risks, and ensuring risk management is an integral part in the governance of the Fund at a strategic and operational level.

The overall aim is to embed risk management into the processes and culture of the Fund to help it achieve its objectives and enhance the value of services the Fund provides to scheme members and employers.

THE FUND'S RM OBJECTIVES

The Fund's RM objectives are to:

- integrate risk management into the culture and day-to-day activities of the Fund;
- raise awareness of the need for risk management by all those connected with the delivery of services (including partners, delivery agents and those involved in any form of collaborative delivery of services);
- enable the Fund to anticipate and respond positively to change;
- minimise loss and inconvenience to employers and scheme members arising from, or connected with, the delivery of Pension Fund services;
- establish and maintain a robust process for identification, analysis, assessment and management of risk, and the reporting and recording of events, based on best practice; and
- ensure consistent application of the Fund's RM methodology.

KEY MECHANISMS FOR DELIVERY

To demonstrate the Fund's clear commitment to achieving the objectives of the risk management strategy, the Fund has identified the key mechanisms through which they will be delivered. These objectives will be achieved by:

- maintaining clear roles, responsibilities and reporting lines within the Fund for risk management;
- maintaining adequate representation at departmental and corporate level, and also across the LGPS, so that risks may be freely communicated, experience pooled and information, guidance or procedures that may have a significant impact on the Fund's risk may be considered;
- promoting excellence in risk management;
- ensuring that risk management is explicitly considered in all policy decisions, partnerships, projects and key planning processes;
- maintaining a risk register for risks arising across all aspects of managing the Fund, and ensuring that the process assesses risks for likelihood and impact, identifies owners and mitigating controls and ensures that they are reviewed at least annually – ensuring that these are adequately documented and regularly reviewed in the light of changing circumstances;
- providing opportunities for shared learning on risk management across the LGPS, and with partners and stakeholders where appropriate;
- reinforcing the importance of effective risk management as part of the everyday work of employees, and that employees, officers and members are adequately informed and receive training about the risks within their own working environment; and
- regularly monitoring, reporting and independently reviewing the Fund's arrangements.

The Fund recognises the breadth and complexity of the service that it delivers, and also of the mechanisms by which they are delivered. Further support, advice and guidance can also be obtained from the Head of Pensions.

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**Pension Fund
RISK REGISTER**

Areas covered

Governance
Investments and Funding
Operational
People

Service Objectives

- 1 Ensure there are enough assets to cover liabilities in the long term
- 2 To prepare the statutory accounts for the Pension Fund to the agreed timetable and with an unqualified audit.
- 3 To monitor all investments to ensure they are fit for purpose and within the targeted risk and return levels
- 4 To monitor the external investment managers and service providers to ensure they are acting within their IMA and/or SLA
- 5 To ensure that there is sufficient liquidity available to pay drawdowns on the Funds commitments and pensions due
- 6 To work in partnership with WYPF to ensure an effective and efficient Pensions Administration Service is provided
- 7 To work in partnership with WYPF to support the employers and scheme members

Fully Refreshed July 2020

ID	Linked to Objective	Description of Risk		Risk Owner	Existing Controls	Status	Owner	1:Low...4:High		Overall Current Risk Score
		Source (Lack of....Failure to)	Consequences (Results inLeads to)					L	I	
Governance										
G1	1,2,3,4,5,6,7	Governance requirements not met	Financial loss Damaged reputation Legal issues	Head of Pensions	Governance compliance statement Pension Committee reporting Monthly member letter Investment Strategy Statement Funding Strategy Statement Trained Committee members and officers Pension Board	Good	Head of Pensions	1	2	2
G2	1,3,4	Failure to ensure that the Committee's knowledge and understanding of pensions related activities is robust and meets all statutory requirements.	Improper scrutiny and challenge, non-compliance, loss of professional investor status with inability to implement investment strategy, reputational damage, secretary of state intervention	Head of Pensions	induction training, training policy and annual training plan, additional committees for training session, self assessment	Good	Head of Pensions	1	2	2
G3	1,3,4	Failure to ensure that the Pension Board's is effective in carrying out its role.	Ineffective scrutiny and challenge, non-compliance, reputational damage, Pensions Regulator intervention	Head of Pensions	induction training, ongoing training and work plan, additional meetings for training session, self assessment	Good	Head of Pensions	1	2	2
G4	1,3,4,5	Governance of asset pooling - management of relationship with BCPP	Inability to implement asset allocation decisions Increased costs Reduced returns	Head of Pensions	Joint Committee Officer operation group Senior officer group	Fair	Head of Pensions	2	3	6
Investment and Funding										
I1	1	Required returns not met due to poor strategic allocation	Damaged reputation Increase in employer contribution	Head of Pensions	Professional advice Triennial review Performance monitoring Monthly Members letter Reporting to Pensions Committee	Good	Head of Pensions	2	3	6
I2	4	Custodian bank goes bust	Inability to settle trades No reconciliation, accounting or performance service Loss of access to cash accounts	Head of Pensions	Service level agreement with termination clause Regular Meetings Regular control reports Other Custodian options - review markets	Good	Head of Pensions	1	3	3

I3	1,3,4	Poor investment performance from managers	Lower funding level Increase in employer contributions	Head of Pensions	Performance measurement Managers report monthly Reporting to pensions committee Diversification across managers Manager meetings	Good	Head of Pensions	2	3	6
I4	1	Assets not enough to meet liabilities	Lower funding level Increase in employer contributions	Head of Pensions	Valuation Asset Liability Study Quarterly reporting of funding level Professional advice	Good	Head of Pensions	2	3	6
I5	4	Non compliance of external managers	Damaged reputation Financial loss	Head of Pensions	FSA regulated Manager due diligence Investment Management Agreements Manager monitoring Report quarterly to team Review every 3 years Qualified officers Additional managers meetings Termination clause	Good	Head of Pensions	1	2	2
I6	1,3,4,5	Asset pooling - transition of assets	Inability to implement asset allocation Impact on performance of costs	Head of Pensions	Officer operations group Workstreams within Border to Coast Communicate to Committee regularly S151 meetings	Fair	Head of Pensions	2	3	6
I7	1,3	Failure to meet requirements as a responsible investor - across all ESG risks (including, climate change and a move to a low carbon economy)	Reputational risk, loss of Fund value	Head of Pensions	Stewardship code compliance Managers reporting requirements LAPFF membership Voting	Good	Head of Pensions	1	2	2
I8	1,5	Economic uncertainty due to UK leaving the EU	Volatility of market Lower gilt yields leading to higher liabilities Inflation increasing liabilities Uncertainty of political direction re pooling	Head of Pensions	Increased monitoring of managers Review investment strategy Regular communications with Committee and Board	Poor	Head of Pensions	4	3	12
I9	1,5	Maturing Fund	Cashflow issues to pay pensions or commitments Increasing employer rates	Head of Pensions	Investment strategy Cashflow monitoring Discourage opt outs 50/50 scheme option Communication	Fair	Head of Pensions	3	2	6
Operational										
O1	6,7	Contributions and payments of pensions ● Non-collection ● Miscoding ● Non-payment	If it doesn't get discovered it effects employers accounting report and Valuation, final accounts and cashflow in pension fund	Head of Pensions	Employer contribution monitoring Additional monitoring at specific times Reconciliations Improved employer contribution data Monthly returns checks UPM employer module Ongoing employer training	Good	Head of Pensions	1	3	3
O2	6,7	Inability to deliver the administration service in accordance with the agreement	Members of the pension scheme not serviced Statutory deadlines not met	Head of Pensions	Performance Indicators General management indicators Bi-monthly meetings with WYPF Horizon Scanning Internal Audit Service Level Agreement Response to Audit Reports in the form of action plans Benchmarking & performance data Process management Error reporting Complaint reporting Customer Surveys	Good	Head of Pensions	2	3	6

O3	6	Calculating and paying pensions correctly (inc. completion of the Guaranteed Minimum Pension Reconciliation and communication with Pensioners)	Damaged reputation Financial loss	Head of Pensions	Internal control through audit process Constant monitoring / checking Quality standard at WYPF Process management NFI and Tracing services Data Cleansing	Fair	Head of Pensions	3	2	6
O4	4,6,7	Non-compliant in Information Governance - incl. GDPR compliance	Risk of fines Reputational risk Personal/sensitive data in the wrong hands	Head of Pensions	WYPF policies Reporting to Committee LCC policies	Fair	Head of Pensions	2	3	6
O5	4,6	Cyber security breach	Systems hacked Loss of Admin system leading to being unable to calculate and pay pensions Loss of data from third party service providers and managers	Head of Pensions	WYPF and Bradford Council policies LCC policies External provider control reports	Good	Head of Pensions	2	3	6
O6	6,7	Employer breaches	Reporting to TPR Fines to employers Reputational risk to LCC and WYPF	Head of Pensions	Make employers aware of responsibilities through Admin Strategy and training Reporting breaches procedure Contribution monitoring	Good	Head of Pensions	1	2	2
O7	1,6	Pension Freedom and Choice rules	Impact on cashflow Process not followed	Head of Pensions	Value of transfers monitored	Good	Head of Pensions	1	2	2
O8	2,6,7	Increasing employer numbers and/or reducing covenant strengths	Increased workload Incorrect rates paid	Head of Pensions	Admission agreements Bonds Employer covenant monitoring Contribution monitoring Employer communication and PFR roles	Good	Head of Pensions	3	2	6
O9	2	Financial Statements of Pension Fund incorrect or late	Damaged reputation Qualified accounts	Head of Pensions	Agreed timetable Externally audited Qualified and trained staff Closedown procedures	Good	Head of Pensions	1	2	2
O10	1,3,4,6	Fraud risk not managed	Financial loss Damaged reputation	Head of Pensions	Separation of duties Internal & external audit Monthly reporting Reconciliation procedures	Good	Head of Pensions	1	3	3
O11	1,3,4	Financial regulations (e.g. LCC / CIPFA) and statutory requirements not adhered to / legal guidelines not followed	LCC may incur penalties Damaged reputation Intervention from Secretary of State Intervention from the Pensions Regulator	Head of Pensions	Underlying regulation of Fund Managers FM control reports Contracts in place setting out parameters LCC staff appropriately qualified and aware of policies and procedures Pension Fund managed in line with statutory regulations Membership of CIPFA Pensions Network, PLSA etc. Pension Board	Good	Head of Pensions	1	2	2
O12	1,3,4,6	Financial or administration decisions challenged	Ombudsman report Reported to TPR	Head of Pensions	Performance monitoring and reporting Monthly and quarterly reporting Admin processes and procedures	Good	Head of Pensions	1	1	1

O13	3,4	Personal gain (internal or external) through: <ul style="list-style-type: none"> • Fraud or misappropriation of funds • Manipulating share price 	Financial loss Damaged reputation	Head of Pensions	Declaration of interests Investment Management Agreements with Fund Managers Vetting of new Fund Managers through tender process Access restricted regarding transfer of funds - authorised signatories required Regulation of Fund Managers Insurance arrangements Code of Conduct Separation of duties	Good	Head of Pensions	1	1	1
O14	6,7									
People										
P1	2,3,4,6	Loss of key staff and loss of knowledge & skills	Inability to deliver service Statutory requirements not met Damaged reputation Pensioners not paid Inability to make investment/administratio n decisions Loss of professional investor status under MIFIDII	Head of Pensions	Diversified staff / team Look at other authorities with best practices to ensure LCC positions still desirable Attendance at pensions user groups, both WYPF and LCC Procedural notes which includes new systems as and when (LCC & WYPF) Section meetings / appraisals (LCC & WYPF) Regular team building (LCC & WYPF) B2C and partner funds relationship Head of Pensions obj. to support/train new Director Agreed training plan/skills gap analysis with Executive Director of Resources	Fair	Head of Pensions	3	2	6

**Pension Fund
CORONAVIRUS RISK REGISTER**

Areas covered

**Governance
Investments and Funding
Operational
People**

ID	Description of Risk	Risk Owner	Mitigating Actions (Treat/Tolerate)	Status	1:Low...4:High		Overall Current Risk
	Risk Description				L	I	
Governance							
CG1	Committee and Local Board meetings disrupted	Head of Pensions	TREAT: 1) Use video / conference calls where possible. 2) Flexibility about meeting dates. 3) Ensure that delegated responsibilities are clearly understood. 4) Review decision making, delegations and meeting powers. 5) Hold Committee and Local Board meetings electronically - when possible. 6) Investigate whether quoracy can be relaxed. 7) Anticipate potential problems and agree actions to address them in advance. 8) Consider delegating responsibility to an emergency response. group.	Good	1	2	2
CG2	Governance with Border to Coast disrupted	Head of Pensions	TREAT: 1) Use video / conference calls. 2) Flexibility about meeting dates. 3) Consider delay of 2020/21 governance plan. 4) Scenario plan impact of the Strategic Plan.	Good	1	2	2
Investment and Funding							
CI1	Contribution rates for employers are unaffordable due to business interruption	Head of Pensions	TREAT/TOLERATE: 1) Consider covenant mitigation factors. 2) Conduct funding and risk discussions with employers. 3) Review contribution plans. 4) Consider alternative sources of funding/security. 5) Discuss individual rate reviews, covenant checks or possible terminations. 6) Temporarily adjust contributions where possible, with approval from the Actuary.	Fair	2	2	4
CI2	Business continuity failures mean employers are unable to meet contribution payment deadlines.	Head of Pensions	TREAT: 1) The Fund has sufficient cash reserves to mitigate negative cash-flow from total contribution failures for a number of months.	Fair	2	2	4
CI3	Investment downside risk has changed.	Head of Pensions	TREAT: 1) Consult with investment consultant, independent advisor and fund actuary. 2) Consider changes to investment strategy, if appropriate.	Fair	3	1	3
CI4	Planned strategic changes no longer appropriate.	Head of Pensions	TREAT: 1) Consult with investment consultant, independent advisor and fund actuary. 2) Reconsider planned asset allocation changes in light of market conditions.	Fair	3	2	6
CI5	Assets no longer aligned with benchmark/risk position	Head of Pensions	TREAT: 1) Review asset allocation. 2) Rebalance to take advantage of market opportunities, subject to a risk assessment - but avoid rebalancing if the risk/volatility is too great. 4) Assess investment opportunities in concert with our investment advisors. 5) Review performance targets.	Fair	3	2	6
CI6	Market distortions	Head of Pensions	TREAT: 1) Monitor market conditions. 2) Try to adhere to agreed strategies / asset classes unless there are very good reasons for deviating, following advice from the Investment Consultant.	Poor	4	2	8

CI7	Fire sale of assets	Head of Pensions	TREAT: 1) Review cash flow requirements and re-assess cash flow buffer. 2) Carefully consider asset transitions - particularly if they are distressed. 3) Consider maintaining a larger than usual cash surplus until the volatility abates.	Fair	3	2	6
Operational							
CO1	Pension administration disruption	Head of Pensions	TREAT: 1) Engage with WYPF to ensure contingency planning is tested and in place.	Fair	1	4	4
CO2	Failure to delivery objectives of the Pension Fund Business Plan within agreed timescales	Head of Pensions	TREAT/TOLERATE: 1) Re-prioritise business tasks. 2) Engage with Pension Committee and Local Board to understand decision making priorities.	Fair	3	1	3
CO3	KPIs deteriorate and volume of work in certain areas increases	Head of Pensions	TREAT/TOLERATE: 1) Accept reasonable disruption, relax the generic KPIs and refocus on key deliverables (deaths, retirements, divorces and urgent transfers).	Fair	3	1	3
CO4	Investment operations delay	Head of Pensions	TREAT: 1) Engage with BCPP, investment managers and custodians for assurance of their contingency plans. 2) Acknowledge that there will be agile working and we need to deal with alternative contacts.	Fair	2	2	4
CO6	Pension members concerned about market volatility	Head of Pensions	TREAT: 1) Agree basic communications plan with WYPF (e.g. pension benefits are not affected - use newsletter, blogs etc.).	Good	2	1	2
CO7	Pension Fund Committee and Local Pension Board concerned about market volatility and business continuity	Head of Pensions	TREAT: 1) Communicate regular updates via email. 2) Share Pension Fund Coronavirus Risk Register.	Fair	3	2	6
People							
CP4	Pension Fund Team functionality diminished	Head of Pensions	TREAT: 1) Review business continuity plan. 2) Review responsibilities and signatory lists so day-to-day activities can continue. 3) Cross train staff, if possible. 4) Amend procedures / documents as necessary. 5) Anticipate potential problems and agree potential solutions to address them in advance.	Fair	2	2	4

**Open Report on behalf of Andrew Crookham,
Executive Director – Resources**

Report to:	Lincolnshire Pensions Board
Date:	16 July 2020
Subject:	Pension Fund Draft Annual Report and Accounts

Summary:

This report brings the draft Annual Report and Accounts for the Pension Fund to the Pensions Board.

Recommendation(s):

That the Board note the draft Pension Fund Annual Report and Accounts.

Background

1. The Pension Fund Annual Report and Accounts for the year ended 31 March 2020 (included at **Appendix A**) has been completed and is being independently audited by the Council's external auditors, Mazars. These accounts also form part of the Lincolnshire County Council Statement of Accounts.
2. The Annual Report and Accounts have been produced taking into account the guidance produced by Chartered Institute of Public Finance Accountants (CIPFA) and relevant accounting standards. There have been no changes to the guidance for preparing the annual report or accounts for 2019/20.

Covid-19 Impact

3. The coronavirus pandemic has had an impact on the preparation of the Pension Fund's Statement of Accounts. This includes:
 - Accounts and Audit Regulations 2015. On 30 April 2020 the Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 came into force. This moved the deadline for publication of audited Statement of Accounts from 31 July 2020 to 30 November 2020. Approval and publication of draft accounts deadline also moved from 31 May to 31 August.

This change only applies to the 2019/20 accounts.

- Valuation of Illiquid Assets. The impact of the Covid-19 pandemic has created uncertainty surrounding illiquid asset values. As such some of the Pension Fund's holdings as at 31 March 2020 are difficult to value according to preferred accounting policy.

a. Pooled property unit trusts. Covid-19 has caused huge disruption and exceptional circumstances within property markets, as a result of this, the valuations provided by independent valuers for these property funds are subject to a 'material valuation uncertainty' qualification as set out in VPGA 10 of the RICS Valuation – Global Standards. Consequently, less certainty and a higher degree of caution should be attached to these valuations than would normally be the case.

This uncertainty has been disclosed within the Pension Fund Accounts.

b. Unquoted assets (including alternatives and private equity holdings). The fair value of these investments is unavoidably subjective in normal circumstances and Covid-19 disruptions may increase this. The valuations are based on forward-looking estimates and judgements involving many factors. Unquoted private equity assets are valued by the investment managers in accordance with industry standards.

The Fund accounts are currently prepared using valuation information available at 31 March 2020 provided by investment managers and validated by the Fund's Custodian. These valuations are mainly based on audited accounts from earlier periods (e.g. 31 December 2019) rolled forward for cashflows, as is allowable by the Code. Normally these valuations would see small incremental movements in value, however, due to the coronavirus pandemic the 31 March actual valuations may be materially different to the rolled forward valuations currently reported in the accounts.

The Fund expects to start receiving the 31 March valuations in July 2020. When these valuations are received Fund Officers will consider their materiality both individually and collectively and revise the accounts to reflect these valuations if necessary.

Next Steps

4. Valuation information from Fund Managers relating to unquoted assets will be considered by Fund Officers for materiality both individually and collectively when received. Following this consideration the accounts may be subject to amendment to take into account any valuation movements identified (including any potential impact on the fair value hierarchy disclosures). If required these changes will affect notes: 12, 14, 15 and 16, in addition to the Net Asset Statement. Any changes to the accounts will be shared with the external auditor before completion of this element of their audit work.

5. The draft Pension Fund Accounts, as part of the County Council draft Statement of Accounts, will be approved by the Audit Committee at its meeting on Monday 13 July.
6. Subject to the completion of audit work the final Pension Fund Accounts will be presented to the Audit Committee at their meeting in September. The final Pension Fund Annual Report and Accounts will then be reported to the Board in October along with comments from the External Auditors report to 'Those Charged with Governance'.

Conclusion

7. The Lincolnshire Pension Fund Report and Accounts has been produced for the year ended 31 March 2020 and presented to the Board. The Accounts element of the report is subject to change in light of outstanding valuation information relating to unquoted asset valuations as at 31 March 2020.
8. Subject to completion of External Audit work the final Annual Report and Accounts will be presented to the Pensions Board in October.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Lincolnshire Draft Pension Fund Annual Report and Accounts 2020

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Claire Machej, who can be contacted on 01522 553641 or claire.machej@lincolnshire.gov.uk.

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Lincolnshire Pension Fund
Annual Report & Accounts

2020

Lincolnshire
Pension Fund



Local Government Pension Scheme

Annual Report for the Year Ended 31 March 2020

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Management Arrangements

Administering Authority

Lincolnshire County Council

Pensions Committee Members as at 31 March 2020

County Councillors

B Adams

R D Butroid

P E Coupland (Vice Chairman)

P Key

C Perraton-Williams

S Rawlins

E W Strengiel (Chairman)

Dr M E Thompson

District Council Representative

R Waller

Representative of Other Employers

S Larter

Employee Representative

A Antcliff (Unison)

Professional Advisors

County Council Officers

Executive Director of Resources

A Crookham BSc CPFA

Head of Pensions

J Ray

Independent Advisor

P Jones

Fund Actuary

Hymans Robertson

Fund Consultant

Hymans Robertson

Asset Pool and Operator

Border to Coast Pensions Partnership

Investment Managers of the Fund as at 31 March 2020

Equities:

Border to Coast

Invesco

Legal and General

Bonds:

Blackrock

Border to Coast

Alternatives:

Morgan Stanley

Private Equity:

Aberdeen Standard

Capital Dynamics

Pantheon

Infrastructure: Infracapital
 Innisfree
 Pantheon

Property: Aberdeen Standard
 Aviva
 Blackrock
 Franklin Templeton
 Igloo
 Royal London
 Rreef

Auditors Mazars
Investment Custodian Northern Trust
AVC Provider Prudential
Fund Banker Barclays
Benefits Administration West Yorkshire Pension Fund



Report of the Pensions Committee

Introduction

The Pensions Committee of Lincolnshire County Council is responsible for the management of the Pension Fund, covering administration, investments and governance. It approves the investment policy of the Fund and monitors its implementation during the year. The Committee generally meets eight times a year, including two manager presentation meetings and two training meetings. Special meetings are convened if considered necessary.

Members of the Committee as at 31 March 2020 are listed on page 4.

All members of the Committee can exercise voting rights.

Corporate Governance and Responsible Investing

The Fund expects its appointed investment managers to act as responsible investors and that they fully integrate environmental, social and governance (ESG) issues into their investment process. It has produced a Responsible Investment Policy and Responsible Investment Beliefs that can be found on the Pension Fund's shared website, at www.wypf.org.uk. The Fund is a member of the Local Authority Pension Fund Forum (LAPFF), an organisation that monitors the governance of companies. The LAPFF seeks to protect and enhance shareholder returns by engaging with companies on a wide range of ESG issues. The Fund has produced a Tier 1 Stewardship Code Statement, in accordance with the Financial Reporting Council's Stewardship Code, to explain how it acts as a responsible shareholder. This can also be found on the Fund's shared website.

Investment Performance

The Fund has an investment objective to meet its liabilities over the long term and to produce a return of 0.75% p.a. over the return produced by the strategic asset allocation benchmark.

The twelve month period ended 31 March 2020 saw the value of the Fund fall by £134.2m to £2,227.0m. The overall investment return of -5.8% was behind the Fund's specific benchmark return of -3.9%. Over the last ten years, the Fund's annualised investment performance of 6.5% is slightly behind the benchmark return of 6.7%.

Detail on the global markets over the year can be found in the Investment Background, on page 38.

Manager Arrangements

In October 2019, the Fund transitioned assets from three active global equity managers (Columbia Threadneedle, Schroders and Morgan Stanley) into the Border to Coast Global Equity Alpha sub-fund. Further assets were transitioned across to Border to Coast in February 2020, moving fixed income assets managed by Blackrock into the Investment Grade Credit sub-fund.



Pensions Administration

The shared service arrangement with West Yorkshire Pension Fund (WYPF) to provide Pensions Administration services for the Lincolnshire Fund is now five years old. A satellite office for WYPF is based in Lincoln, co-located with the LCC Pension Fund team. This arrangement was made to improve efficiency and reduce costs in the provision of the Pensions Administration service, and this is now being seen. The move from an annual data return to a monthly process has considerably improved the quality of data held in the administration system, enabling a better service to be provided to scheme members. WYPF continues to work with the Lincolnshire Fund and its employers to improve all aspects of administering the scheme.

The initial period for the shared service was five years, from April 2015, with two additional two year extensions available. At its March 2019 meeting, the Pensions Committee approved the first two year extension to the shared service, taking the agreement to 31 March 2022. The final extension will be considered in March 2021, to allow time for any retender of the service, if required.

Local Pension Board

It is now five years since the introduction of the requirement for a Local Pension Board for the Lincolnshire Pension Fund, as prescribed in the Public Service Pensions Act 2013 and the Local Government Regulations 2013. Its oversight role to ensure that the Fund is meeting all the requirements for administration and governance, as set out in the various regulations and by the Pensions Regulator, has been a welcome addition to the governance structure of the Pension Fund. The annual report of the Board can be found on page 31.

Asset Pooling

The requirement to pool the Fund's assets with other LGPS Funds came into statute in November 2016. Lincolnshire chose to become part of the Border to Coast Pensions Partnership (Border to Coast), alongside eleven other partner LGPS funds. Progress has continued to ensure that Border to Coast is able to implement the investment strategy of the twelve partner funds, over the long term. The total asset value of the twelve partner funds is in excess of £45bn. The oversight of the asset pool is carried out by a Local Government Joint Committee and by the Administering Authority as shareholders. The objective of Border to Coast is to reduce investment costs, improve performance and increase resilience across the Funds, over the long term. Border to Coast went live in July 2018, with assets from three of the partner funds with internally managed assets. Work continues with Border to Coast in creating the sub-fund range that will be available to the Fund. As mentioned above, Lincolnshire transitioned its first assets across to Border to Coast in autumn 2019.



Coronavirus Pandemic

The effects of the Coronavirus pandemic on the valuation of some of the investments in the Pension Fund are explained in the notes to the accounts on pX. The business continuity plans of the Lincolnshire Pensions Team and WYPF, as the administrators, were put into place in March and all aspects of managing the Fund continued to be fulfilled.

Fund Governance and Communication Statements and the Investment Strategy Statement

The Fund's investments are managed in accordance with the Investment Strategy Statement (ISS).

The Fund's ISS, Governance Compliance Statement, Communications Policy, Funding Strategy Statement and Administration Strategy are all attached at the end of this report. These documents, and other related publications, can also be downloaded from the Pension Fund's shared website, at www.wypf.org.uk.

Hard copies of any of these statements may be obtained from:

Jo Ray, Head of Pensions

Lincolnshire County Council, County Offices, Newland, Lincoln, LN1 1YL

Tel: 01522 553656 | email: jo.ray@lincolnshire.gov.uk

Councillor Eddie Strenziel
Chairman
Pensions Committee

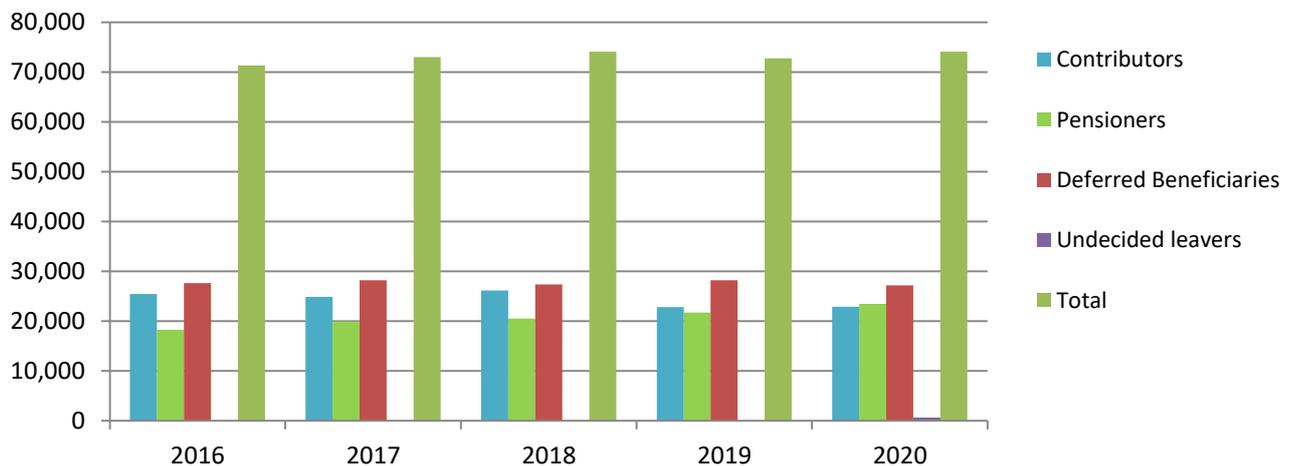


Management Report of the Administering Authority

The Local Government Pension Scheme (LGPS) is a national scheme administered on a local basis by Lincolnshire County Council, providing current and future benefits for over 74,000 scheme members.

Local Government Pension Scheme Membership

As can be seen from the chart below, the active membership has dropped, much of which is due to data cleansing activity undertaken with employers. The Fund has matured over the last five years, with pensioner and deferred members (those that are no longer in the Scheme but will be entitled to a pension at some point in the future) making up 68.3% of the overall membership.



Year ended 31March	2016	2017	2018	2019	2020
Contributors	25,451	24,893	26,153	22,820	22,890
Pensioners	18,281	19,916	20,543	21,715	23,438
Deferred Beneficiaries	27,618	28,182	27,356	28,221	27,201
Undecided Leavers*	-	-	-	-	529
Total	71,350	72,991	74,052	72,756	74,058

*undecided leavers only recorded at year end from 31 March 2020

(Note: The numbers disclosed in the table above reflect individual pension records within the County Council's database at a point in time. Current and past members of the LGPS may have more than one pension record as a result, for example, of having more than one part time contract of employment with a Scheme employer.)

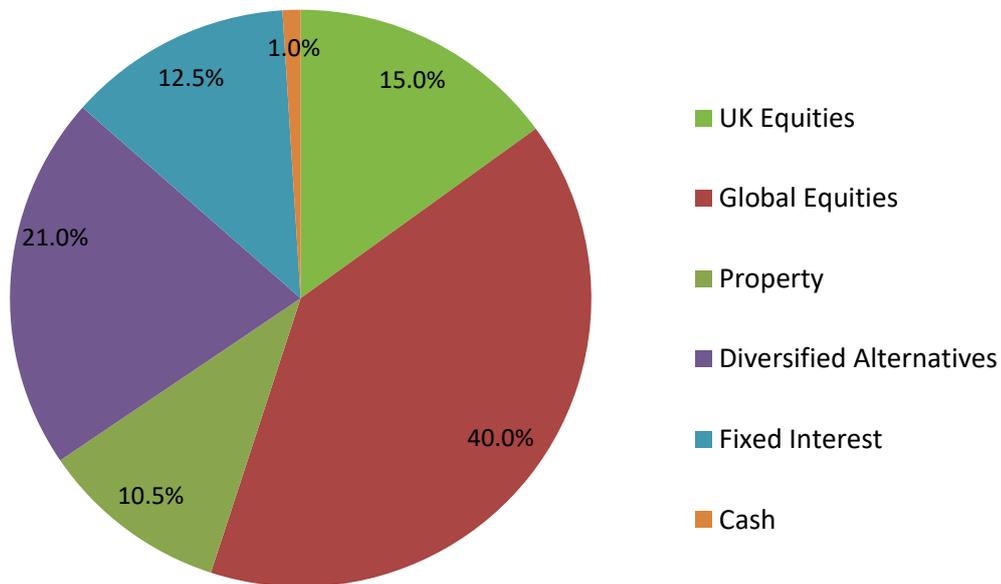
Investment Policy

The Fund is managed with regard to a strategic asset allocation benchmark. This is reviewed at least every three years, alongside the Fund's triennial valuation. The strategic asset allocation is set to provide the required return, over the long term, to ensure that all pension payments can be met. The actual asset allocation may differ from the strategic benchmark within tolerances that are

agreed by the Pensions Committee. The distribution of investments is reported to the Pensions Committee monthly and quarterly.

Strategic Asset Allocation Benchmark

The asset allocation below reflects the long term assets allocation agreed by the Pensions Committee, however this will be implemented over time as the Fund transitions assets to Border to Coast. In the interim, the actual asset allocation may be quite different to the final strategic allocation. For performance measurement purposes the strategic allocation is amended as assets are moved.



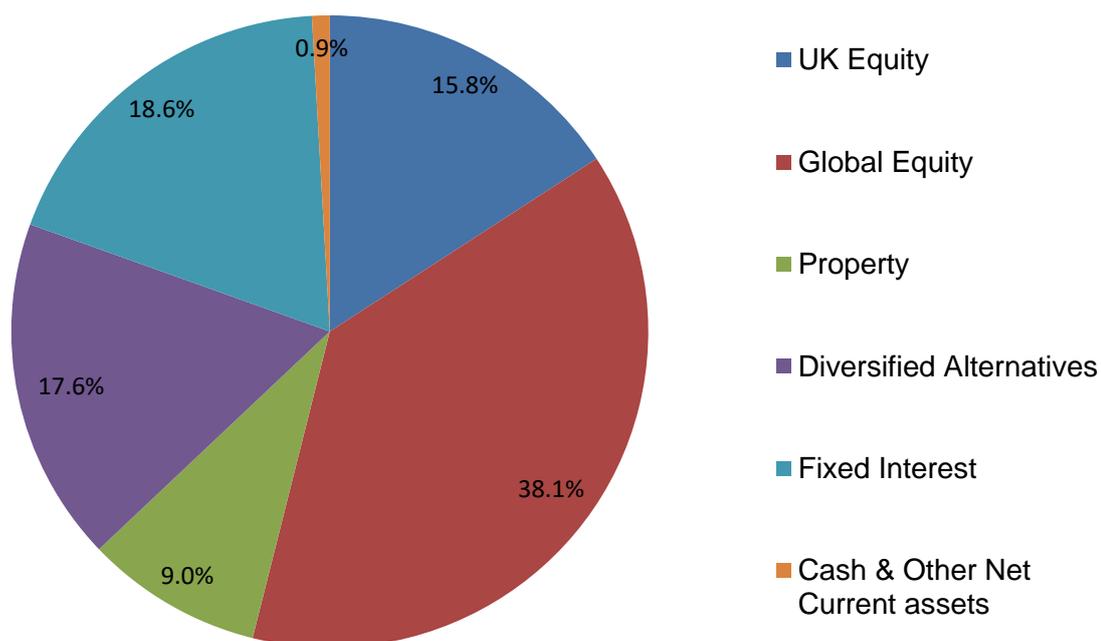
Asset class	Strategic Benchmark 31 March 2020 %	Strategic Benchmark 31 March 2019 %
UK Equities	15.0	20.0
Global Equities	40.0	40.0
Total Equities	55.0	60.0
Property	10.5	9.0
Infrastructure	-	2.5
Diversified Alternatives (incl. Private Equity, Infrastructure, Multi Asset Credit)	21.0	15.0
Fixed Interest	12.5	13.5
Cash	1.0	0.0
Total	100.0	100.0

Total Actual Asset Distribution

The distribution of the assets is shown in the table and pie chart below.

Asset Class	Market Value £'m	31/3/20 %	31/3/19 %
UK Equity	350.1	15.8	18.2
Global Equity	848.0	38.1	44.3
Total Equities	1198.1	53.9	62.5
Property	200.0	9.0	8.6
Diversified Alternatives (incl. Private Equity, Infrastructure, Multi Asset Credit)	392.4	17.6	15.9
Fixed Interest	414.9	18.6	12.0
Cash & Other Net Current Assets	20.7	0.9	1.0
	2,226.1	100.0	100.0

*excludes Border to Coast share holding valued at £833,334



Fund Investment Performance

The twelve month period ended 31 March 2020 saw the value of the Fund fall by £134.2m to £2,227.0m. The overall investment return of -5.8% was behind the Fund's specific benchmark return of -3.9%. Over the last ten years, the Fund's annualised investment performance of 6.5% is slightly behind the benchmark return of 6.7%. The biggest impact was the underperformance of the Invesco Global Equities mandate.

Annual investment performance over the previous ten years is set out in the table below. The Fund's ten year annualised return of 6.5% compares to a rise in retail prices of 2.9% and an increase in public sector earnings of 1.7%.

Investment Performance of the Fund 1 April 2010 to 31 March 2020

	Lincolnshire Fund Return	Comparative Benchmark Return	Retail Price Inflation	Public Sector Increase in earnings
	%	%	%	%
2010/11	7.9	7.8	5.3	2.2
2011/12	1.5	2.4	3.6	1.8
2012/13	12.6	11.3	3.3	1.1
2013/14	6.3	6.2	2.5	1.1
2014/15	12.3	12.4	0.9	(0.9)
2015/16	1.0	1.8	1.6	1.9
2016/17	19.8	19.3	3.1	1.3
2017/18	3.3	3.0	3.3	2.6
2018/19	8.2	8.1	2.4	2.7
2019/20	(5.8)	(3.9)	2.6	3.0
10 years annualised	6.5	6.7	2.9	1.7

Manager/Asset Class Performance of the Fund

Asset Class	1 Year		3 Years**		5 Years**	
	FM	BM	FM	BM	FM	BM
Equities						
LGIM	(25.1)	(25.1)	(18.3)	(18.5)	(4.1)	(4.2)
Invesco	(7.9)	(5.0)	0.8	2.6	6.8	7.5
Border to Coast Global Equity*	n/a	n/a	n/a	n/a	n/a	n/a
Fixed Interest						
Blackrock	3.7	3.5	3.1	2.8	5.1	5.0
Blackrock (interim)	0.3	0.2	0.9	0.9	n/a	n/a
Border to Coast Investment Grade Credit*	n/a	n/a	n/a	n/a	n/a	n/a
Property/Infrastructure						
Property Unit Trusts	(0.3)	0.0	3.3	4.9	3.9	5.8
Property Other and Infrastructure**	(4.8)	7.0	3.3	7.0	7.0	7.0
Diversified Alternatives						
Morgan Stanley	3.6	5.0	5.1	4.7	3.6	4.6
Legacy Private Equity	8.6	5.0	10.4	4.7	11.4	4.6
Infrastructure**	5.0	6	n/a	n/a	n/a	n/a
Total	(5.8)	(3.9)	1.7	2.3	4.7	5.3

* Border to Coast Global Equities and Border to Coast Investment Grade Credit were both invested during 2019/20

**Infrastructure was comingled with property returns until 1/4/2019

Top Holdings

Listed below are the top twenty holdings in the Pension Fund, including both pooled investments and direct holdings in the segregated account, as at 31 March 2020. These account for £1,715.2m and make up 77% of the Fund's investments.

	Market Value £m's	Proportion of Fund %
Legal & General UK Equity Index Fund	350.1	15.7
Border to Coast Global Equity Alpha Fund	345.0	15.5
Morgan Stanley Alternative Investments	323.4	14.5
Border to Coast Investment Grade Credit Fund	180.3	8.1
Blackrock Aquila Life <5 Year Corporate Bond Fund	85.6	3.8
Blackrock Aquila Corporate Bond Fund	75.4	3.4
Aberdeen Standard Property Fund	63.0	2.8
Aviva Property Fund	48.2	2.2
Blackrock Aquila Life >5 Year ILG Fund	44.1	2.0
Blackrock Property Fund	40.1	1.8
Blackrock Aquila Gilts Fund	29.6	1.3
Royal London Asset Management Property Fund	24.2	1.1
Microsoft	19.2	0.9
Apple	18.7	0.8
Innisfree Secondary Fund	16.8	0.8
Standard Life European Property Growth Fund	13.2	0.6
Amazon	11.7	0.5
Infracapital Greenfield Partners	9.6	0.4
Innisfree Secondary Fund 2	8.7	0.4
Innisfree Continuation Fund	8.3	0.4
Total	1,715.2	77.0

Investment Management Arrangements

The arrangements for segregated management of the Fund's assets are set out below. Portfolio values include cash and other investment balances at 31 March.

Segregated Investment Management Mandates

Asset Class	Manager	Market value £m's	% of the Fund
Global Equities - (Ex UK)	Invesco	503.0	22.6
Total Segregated Equities			

The Fund also invests in a number of asset classes by means of collective investment vehicles, also known as pooled funds. Pooled fund values exclude cash where this is held at an asset class level with the custodian.

Pooled Funds

Asset Class	Manager	Market value £m's	% of the Fund
Property	Franklin Templeton	1.4	0.1
	Igloo	0.3	0.0
	Aviva	48.2	2.2
	Royal London	24.2	1.1
	Rreef	0.5	0.0
	Blackrock	40.1	1.8
	Aberdeen Standard	76.2	3.4
	Total Property		190.9
Infrastructure	Innisfree	33.7	1.5
	Infracapital	9.6	0.4
	Pantheon	4.5	0.2
	Total Infrastructure	47.8	2.1
Private Equity	Capital Dynamics	4.0	0.2
	Pantheon	10.0	0.5
	Aberdeen Standard	4.0	0.2
	Total Private Equity	18.0	0.9
Fixed Interest	Blackrock	234.6	10.5
	Border to Coast	180.3	8.1
	Total Fixed Interest	414.9	18.6
Alternatives	Morgan Stanley	323.4	14.5
UK Equities	Legal and General	350.1	15.7
Global Equities	Border to Coast	345.0	15.5
Total Pooled Vehicles		1690.1	75.9

Investment Administration and Custody

The Fund's segregated managers are responsible for the administration of the assets held within their mandates, and the Council's officers are responsible for the administration of the pooled fund investments.

The Fund's custodian at 31 March 2020 was Northern Trust, with responsibility for safeguarding the segregated assets, in addition to providing investment accounting and performance measurement services.

Funding

The Lincolnshire Pension Fund's latest triennial valuation was as at 31 March 2019. The results from this are published on the Fund's shared website.

The table below summarises the latest triennial valuation's financial position in respect of benefits earned by members up to this date, compared with the previous valuation.

	31 March 2016	31 March 2019
Past Service Liabilities	£2,288m	£2,536m
Market Value of Assets	£1,759m	£2,353m
Surplus/(Deficit)	(£529m)	(£183m)
Funding Level	77%	93%

The funding level of the Fund is monitored each quarter on a roll forward basis, and this is reported to the Pensions Committee.

Stewardship Responsibilities

As a responsible shareholder, the Lincolnshire Pension Fund has produced a Tier 1 Stewardship Code statement, in compliance with the Financial Reporting Council's Stewardship Code. It encourages its external managers and service providers to produce their own codes, and to report their engagement and stewardship activity to the Fund.

The Pensions Committee agree that the adoption of good practice in Corporate Governance will improve the management of companies and thereby increase long term shareholder value. The Fund's Responsible Investment (RI) policy and Corporate Governance and Voting policy can be found on the shared website at www.wypf.org.uk. These policies are aligned with those of our asset pool, Border to Coast, who is responsible for implementing them across the assets that they manage for the Fund. In addition to this, the Committee agreed a set of Responsible Investment Beliefs, which can also be found on the shared website. Any investment decisions that the Committee make are made with consideration of these beliefs.

The Fund requests that its segregated managers vote on all direct company holdings, wherever possible. The votes cast by these managers are reported to the Pensions Committee on a quarterly

basis, and this information is available on the Lincolnshire County Council website in the relevant Committee documents.

The Fund works closely with Border to Coast and the other partner funds within the asset pool to ensure that they integrate RI into all of their investment activity. Examples of activity undertaken by Border to Coast are shown below, alongside the areas of principle that have been agreed across the partner funds. Further information on the RI work that Border to Coast does can be found on their website at www.bordertocoast.org.uk.

Principle	Activity
Integrating ESG	<ul style="list-style-type: none"> Training sessions for portfolio managers ESG and carbon screens fed into quarterly meetings Managers challenged on stocks held RI reviews and questions in manager searches RI reviews on potential alternative investments
Active Ownership	<ul style="list-style-type: none"> Actively voting in line with the agreed policies Discussions and challenge to companies held
Disclosure	TCFD (Taskforce on Climate-related Financial disclosure) report
Promoting PRI	<ul style="list-style-type: none"> Reporting against the PRI (Principles of Responsible Investment) framework ESG included in research procurement
Collaboration	<ul style="list-style-type: none"> Working with Robeco Collaborative engagement on Tailings Dam Safety Initiative Joined Cyber and Data Security collaboration
Reporting	<ul style="list-style-type: none"> Improving quarterly stewardship reporting Producing Annual RI and Stewardship report

The Fund is also a member of the Local Authority Pension Fund Forum (LAPFF), which is a voluntary organisation of 80 public sector Pension Funds based in the UK. LAPFF exists to promote the investment interests of Local Authority Pension Funds, and to maximise their influence as shareholders in promoting corporate social responsibility and high standards of corporate governance in the companies in which they invest. Further information on the work of the LAPFF can be found at www.lapfforum.org. LAPFF engages with companies across a wide range of issues that can broadly be grouped into five engagement themes:

- Environmental and carbon risk;
- Social risk;
- Governance risk;
- Reliable accounts; and
- LGPS and Stewardship.

Risk Management

Risk management is an integral element of managing the Pension Fund. The Pension Fund has a risk register which identifies the major risks associated with managing the Fund. This is reviewed by the Pensions Committee annually, and new or changed risks are reported at each quarterly meeting.

The table below highlights the key risks and how they are managed.

Key risk identified:	A range of controls are in place including:
Assets do not cover liabilities	Triennial valuation, diversification of investments, regular monitoring and reporting, professional advisors.
The inability to deliver the Pensions Administration Service, due to failure in the shared service agreement	Performance and management indicators, regular meetings, internal and external audits, service level agreement and benchmarking.
Paying pensions correctly	Process controls, audits, reconciliations, task management.
Collecting contributions correctly	Employer contribution monitoring, monthly contribution data returns, audits, employer training, reconciliations.
Not meeting statutory requirements	Pension Board oversight, checklist against the Pensions Regulator requirements, regular reporting to Committee and Board.
Loss of key staff, knowledge and skills	Diversified staff/team, pensions user groups, procedural notes, appraisals.
Asset Pooling – the management of the relationship with Border to Coast Pensions Partnership and the investment performance, as a client and a shareholder	Joint Committee, officer operations group, senior officers group, regular meetings with Border to Coast.

Information regarding the risks relating to financial instruments is included within the notes to the accounts, later in this report.

Lincolnshire County Council's (LCC) internal audit team regularly undertake audits across different aspects of the Fund's management and administration. The output from these audits is reported to the Council's Audit Committee, and brought to the Pension Board and Committee as appropriate. Internal audits undertaken in 2019/20 covered assurance of the administration service provided by West Yorkshire Pension Fund (WYPF). The Council's audit team reviewed outcomes of the pensions administration audits undertaken by the Bradford Metropolitan District Council, who are responsible for the internal audit function of WYPF. Areas covered and outcomes are shown below:

- New Pensions and Lump Sums – Normal and early retirements = Good
- Transfer in = Good
- Accuracy of contributions recorded on members records = Partially effective



- Information Governance = Good
- Transfer of data = Partially effective

Following their conversations with the WYPF audit provider, LCC can continue to place assurance on the robust nature of the audits completed by Bradford MDC. They were pleased to see that the audits continue to have positive assurance levels to date and that actions are implemented promptly. They note that the audit around the Accuracy of contributions recorded on member records has a lower level of assurance and that this will reflect similar issues with LGPS members. They will liaise with the Bradford MDC team to confirm that management actions are fully implemented within agreed timescales. In addition, time has been allocated in the 2020/21 audit plan to revisit this activity towards the end of that financial year.

They are happy to place reliance on this assurance over Pension Administration and plan to maintain their relationship with Bradford MDC.

Assurance from the service suppliers and fund managers appointed by Lincolnshire Pension Fund is obtained thorough the receipt and monitoring of control reports – e.g. ISAE 3402 (AAF 01/06) or SSAE16/70. For 2019/20 reasonable assurance was obtained from all third party operations.

Employer Contribution Rates

Analysis of Active and Ceased Employers in the Fund:

	Active	Ceased	Total
Scheduled Body	222	12	234
Admitted Body	29	15	44
Total	251	27	278

The employers' contribution rates (including deficit cash or percentage of payroll amounts where applicable) applying in the year ended 31 March 2020, for all employers are set out below, alongside actual cash contributions received from both the employer and the employees for each body.

Scheduled & Admitted Bodies Contributing to the Fund as at 31 March 2020:

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
SCHEDULED BODIES				
County and District Councils				
Lincolnshire County Council	16.4	£6,510	16,978.1	6,582.8
LCC Schools	16.4	7.5%	10,220.6	2,773.8
Boston Borough Council	16.6	£570k	956.0	373.1
East Lindsey District Council	16.6	£789k	1,336.4	514.6
City of Lincoln Council	16.0	£1,743	2,370.2	962.3
North Kesteven District Council	16.3	£779k	1,512.9	607.2
South Holland District Council	16.7	£638k	1,018.8	397.4
South Kesteven District Council	16.5	£1,128k	2,207.9	876.0
West Lindsey District Council	16.2*	£863k	963.7	440.2
Internal Drainage Boards				
Black Sluice	16.8*	£98k	120.2	55.3
Lindsey Marsh	17.5*	£26k	252.4	112.8
North East Lindsey	17.9	£17k	7.6	2.9
South Holland	18.3	£100k & 10.4%	108.8	24.7
Upper Witham	18.4	£58k	68.3	25.2
Welland and Deeping	17.7	£125k	142.3	55.6
Witham First	19.3	£5k & 7.5%	70.3	19.5

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
Witham Fourth	18.0	£92k	176.2	66.4
Witham Third	17.3	£39k & 6.7%	152.8	46.3
Parish and Town Councils				
Billinghay PC	19.3	2.3%	4.0	1.2
Bourne TC	19.3*	2.3%	10.2	3.2
Bracebridge Heath PC	19.3	2.3%	9.1	2.4
Cherry Willingham PC	19.3	2.3%	2.1	0.5
Crowland PC	19.3	2.3%	7.5	2.0
Deeping St James PC	19.3	2.3%	7.1	2.0
Gainsborough TC	19.3	2.3%	31.9	9.0
Gedney PC	19.3	2.3%	3.4	0.9
Greetwell PC	19.3	2.3%	0.8	0.2
Heighington PC	19.3	2.3%	1.5	0.4
Horncastle TC	19.3	2.3%	14.6	3.9
Ingoldmells PC	19.3	2.3%	5.2	1.4
Louth TC	19.3	2.3%	13.4	3.8
Mablethorpe & Sutton TC	19.3	2.3%	19.9	6.8
Market Deeping TC	19.3	2.3%	12.6	3.4
Metheringham PC	19.3	2.3%	1.2	0.3
Nettleham PC	19.3	2.3%	6.5	2.0
North Hykeham TC	19.3	2.3%	29.0	7.8
Pinchbeck PC	19.3	2.3%	7.6	2.3
Skegness TC	19.3	2.3%	46.0	13.0
Skellingthorpe PC	19.3	2.3%	9.1	2.4
Sleaford TC	19.3	2.3%	48.4	12.8
Stamford TC	19.3	2.3%	28.3	7.8
Sudbrooke PC	19.3	2.3%	1.5	0.4
Sutton Bridge PC	19.3	2.3%	6.1	1.8
Thorpe on the Hill PC	19.3	2.3%	8.3	2.0
Washingborough PC	19.3	2.3%	10.0	2.8
Welton-by-Lincoln PC	19.3	2.3%	7.3	2.2
Woodhall Spa PC	19.3	2.3%	3.3	0.9
FE Establishments				
Bishop Grosseteste University	20.9*	£84k	857.3	288.9
Boston College	21.5	£78k	752.4	208.0
Grantham College	21.0	£88k	582.4	168.9

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
Lincoln College	22.3	£457k	883.3	246.2
Stamford College	20.6	£65	555.9	166.5
Other Scheduled Bodies				
Acorn Free School	16.5		18.3	6.6
BG Lincoln	20.7	£2k	30.8	8.6
Public Sector Partnership Services	21.8		1,018.8	290.6
Police Chief Constable and Police & Crime Commissioner (pooled rates also with G4S)	16.3	£1,265k	146.8	68.4
Academies and Multi Academy Trusts				
Aegir Community Academy	19.0	£35k	127.5	40.9
Alford Queen Elizabeth	19.5*		74.1	24.8
Bassingham Primary Academy	20.8	£8k	34.7	9.5
Beacon Primary	15.9		30.8	11.0
Boston Grammar	18.4	£7k	96.0	31.1
Boston High School	18.6*	£21k	88.9	31.5
Boston John Fielding	17.9	£28k	111.0	36.5
Boston St Mary's RC Primary	18.6	£2k	47.0	14.1
Boston West Academy	19.2		52.9	15.6
Boston Witham Federation	17.7	£57k & 0.5%	708.9	231.5
Bourne Abbey Academies Trust	19.0	£3k	218.6	66.6
Bourne Academy	19.4	£23k	208.4	64.9
Bourne Grammar	19.0	£31k	144.9	47.4
Bourne Keystone Academy Trust	19.5*	£9k	121.5	38.8
Bracebridge Infant and Nursery	18.4		32.8	10.5
Branston CofE Infant School	20.5	£3k	20.9	5.7
Branston Community Academy	19.1		181.5	54.7
Branston Junior Academy	19.2	£12k	21.3	6.2
Browns CofE Academy	21.7	£5k	17.9	4.6
Caistor Grammar Academy	18.7*	£1k	66.5	22.8
Caistor Yarborough	17.9	£9k	76.6	25.1
Carlton Academy	17.6		91.6	31.3
Caythorpe Primary Academy	19.7	£5k	25.2	7.2
Chapel St Leonards Academy	20.2	£6k	56.7	16.6
Cherry Willingham Primary	19.7	£5k	24.3	7.6
David Ross Educational Trust	18.0	£152k	444.6	142.8
Eastfield Infant and Nursery School	19.5	£12k	84.0	24.9

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
Edenham CofE Academy	21.3	£8k	14.6	3.8
Ellison Boulters Academy	20.0	£4k	51.0	14.5
Ermine Primary	18.5	£9k	132.0	40.7
Fosse Way Academy	19.0	£10k	106.7	31.0
Frithville Primary	19.1*	£2k	13.0	3.8
Gainsborough Benjamin Adlard	18.6		50.9	15.4
Gainsborough Parish Church	18.5	£13k	66.7	20.5
Giles Academy	17.4	£6k	118.7	38.7
Gipsey Bridge Academy	19.9	£4k	18.4	5.4
Gosberton House Academy	18.6	£23k	103.5	32.5
Grantham Ambergate	18.0	£27k	189.3	66.2
Grantham Greenfields Academy	18.9	£11k	44.2	14.8
Grantham Isaac Newton Primary	19.3	£13k	86.4	25.5
Grantham Kings School	19.9*	£13k	122.9	40.7
Grantham Sandon	18.5	£31k	103.7	32.4
Grantham St Mary's Catholic	20.1	£4k	35.7	9.8
Grantham Walton Girls	19.8	£11k	97.4	28.7
Harrowby CofE Infants	18.6*	£5k	21.8	7.4
Hartsholme Academy	16.1	£5k	79.2	31.7
Heighington Millfield Academy	18.9	£3k	57.8	17.6
Hillcrest EY Academy	16.9	£8k & 0.2%	54.1	17.8
Holbeach Bank Academy	19.8	£1k	19.7	5.6
Holbeach Primary	17.2	£10k	48.9	16.0
Holy Trinity CofE Primary	20.1	£6k	21.6	5.9
Horncastle Banovallum	18.4*	£38k	120.0	40.3
Horncastle Education Trust	17.15*/ 18.4*		23.1	9.5
Horncastle QE Grammar	18.9*	£23k	99.7	33.8
Huntingtower Community Primary	17.9	3.0%	107.1	28.9
Huttoft Primary Academy	18.7		51.1	14.8
Ingoldmells Academy	18.7	£5k	30.8	9.2
John Spendluffe Academy	18.8	£26k	161.1	49.9
Keelby Primary Academy	19.7	£11k	35.7	10.1
Kesteven & Grantham Academy	19.1	£37k	177.4	54.6
Kesteven & Sleaford High	19.0*	£18k	95.7	32.3
Kidgate Primary Academy	17.4	£10k	67.9	22.6

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
Kirkby La Thorpe	19.4	£2k	33.0	9.5
Lacey Gardens Junior School	18.5	£11k	87.3	26.6
Lincoln Anglican Academies	16.4		58.3	25.2
Lincoln Castle Academy	19.4	£18k	128.8	41.0
Lincoln Christs Hospital School	19.5	£30k	210.5	63.1
Lincoln Our Lady of Lincoln	18.8*	£2k	43.9	12.9
Lincoln St Hugh's Catholic	19.0*	£8k	61.3	18.2
Lincoln St Peter & St Paul's	19.1*	£16k	90.7	27.5
Lincoln UTC	17.6		46.9	15.9
Lincoln Westgate Primary	18.4	£6k	61.2	19.1
Ling Moor Academy	19.1	£7k	63.9	18.6
Little Gonerby CofE	19.6	£5k	43.2	12.7
Long Bennington CofE	19.7*	£6k	39.3	12.9
Long Sutton Primary School	24.8*	£13k	37.3	9.2
Louth Academy	19.4	£46k	106.7	31.5
Louth King Edward VI Grammar	19.0	£44k	106.7	34.6
Mablethorpe Academy	19.2	£13k	81.6	24.9
Manor Farm Academy	17.4		26.7	8.5
Manor Leas Infant Academy	19.3	£2k	35.4	10.2
Manor Leas Junior Academy	18.9	£6k	32.8	9.8
Market Rasen De Aston	18.8	£3k	174.2	54.8
Morton CofE Academy	20.8	£16k	43.5	11.6
Mount Street Academy	17.6	£11k	97.6	32.1
National CofE Junior	19.2*	£14k	71.5	23.9
Nettleham Infants Academy	19.1*	£7k	31.3	10.2
New York Primary	18.5*	£1k	16.7	5.3
North Kesteven School	18.7*	£65k	150.8	54.6
North Thoresby Primary	18.6		17.4	5.2
Poplar Farm School	17.2		21.2	7.0
Priory Federation of Academies	18.2		1,023.6	329.9
Rauceby CofE	19.6	£6k	29.6	8.6
Redwood Primary	20.5	£4k	39.9	11.3
Ruskington Chestnut Street	19.5	£22k	50.6	14.5
Seathorne Primary, Skegness	24.6	£16k	64.2	15.0
Sir Robert Pattinson Academy	18.8	£22k	190.9	59.9
Sir William Robertson	18.7	£25k	131.3	42.4

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
Skegness Academy	18.4	£26k	199.8	65.1
Skegness Infant Academy	18.1	£11k	62.2	19.4
Skegness Junior Academy	18.7	£7k	73.4	21.6
Sleaford Carres Grammar	19.3*	£30k	165.4	60.1
Sleaford Our Lady of Good Counsel	17.9*		26.2	8.1
Sleaford St Georges	19.1		393.4	123.8
Sleaford William Alvey	18.9	£4k	85.2	25.3
Somercotes Academy	18.5	£28k	40.7	12.3
South Witham Community	20.6*	£7k	20.6	6.1
Spalding Academy	19.4	£59k	164.3	50.1
Spalding Grammar	19.6	£27k	131.0	40.8
Spalding Parish Church CofE	24.6	£3.7k	47.3	11.2
Spilsby Primary Academy	18.5	£10k	52.6	16.3
Springwell Lincoln City Academy	18.5	£10k	280.6	90.7
St Bernards Academy Louth	19.0	£59k	154.6	47.7
St Giles Academy	18.2	£29k	97.1	30.4
St John's Primary Academy	18.8	£16k	76.8	23.7
St Lawrence Academy	17.2	£30k	119.2	40.5
St Michaels CofE Primary	19.7	£9k	69.1	19.5
St Nicholas CofE Boston	25.5	£6k	39.1	8.6
St Norberts Catholic Primary	19.1	£1k	35.3	10.2
St Paul Community Primary	16.4	7.5%	10.0	3.3
S Thomas CofE Boston	19.2	£12.6k	83.8	25.6
Stamford Malcolm Sargent	18.5		148.8	46.1
Stamford St Augustines	18.8*	£3k	32.9	9.8
Stamford St Gilberts	18.6	£8k	44.7	13.5
Stamford Welland Academy	20.6		72.5	20.4
Tall Oaks Academy Trust	18.5	£9k	152.8	47.0
The Deepings Academy	19.7		237.4	71.8
The Gainsborough Academy	18.8		135.9	42.1
The Garth School	18.2	£24k	90.7	29.2
The Marton Academy	20.5	£5k	17.9	4.9
The Priory School	18.4	£19k	80.1	25.0
The Priory Pembroke	20.1	£15k	81.9	23.1
Theddlethorpe Primary Academy	21.5	£6k	21.6	5.7
Thomas Cowley Academy	19.0	£28k	141.4	46.2

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
Thurlby Community Primary	23.8	£1k	6.2	1.5
Tower Road Academy	19.5	£17k	110.0	32.2
University Academy Holbeach	19.1	£40k	234.0	74.9
University Academy Long Sutton	23.3	£24k	106.8	27.8
Utterby Primary Academy	19.5	£1k	15.1	4.3
Waddington All Saints Primary	19.8	£7k	59.1	17.1
Wainfleet Magdalene Primary	18.5	£16k	59.5	17.8
Warren Wood Specialist	19.5	£34k	90.2	26.3
Washingborough Academy	19.3		59.4	17.6
Welton William Farr CE	19.2	£49k	235.2	70.1
Welton St Mary's CofE	18.8	£1k	45.2	14.4
West Grantham Federation	18.6	£11k	221.4	70.6
Weston St Mary	16.3	£1k	5.6	1.9
Whaplode CofE Academy	19.9	£4k	44.0	12.5
William Lovell Academy	19.9	£29k	62.6	17.8
Willoughby School Bourne	18.2		86.7	27.6
Witham St Hughs Academy	17.6	£4k	54.0	17.8
Woodhall Spa St Andrews	17.8	£5k & 0.5%	50.1	15.4
Woodlands Academy Spilsby	19.9	£34k	48.0	14.1
Wyberton Primary School	19.5	£12k	46.4	13.3
ADMITTED BODIES				
Active Lincolnshire	21.9	£3k	21.3	7.1
Active Nation	26.9	£6k	12.3	2.8
Adults Supporting Adults	29.1*		12.6	2.5
Aspens Services	31.7		6.8	1.3
Caterlink	32.2		13.0	2.2
Compass Contract Services (UK) Ltd	30.2		21.9	4.1
Consultant Services Ltd	28.4		0.3	0.1
Danfo	31.1		12.1	2.3
Easy Clean Contractors (Baston)	37.3		2.5	0.4
Easy Clean Contractors (Linchfield)	30.4		1.5	0.3
Edwards & Blake	25.9	£5k	8.9	2.1
Future Cleaning Services	29.1		5.2	1.0
G4S (for rate see Police pool)			651.6	255.0
Greenwich Leisure Limited	29.0		377.9	95.9
Kier	26.3		194.5	50.1

Employer	Primary Rate	Secondary Rate	Contributions received £k	
	%	(% or £k)	Employer	Employee
Lincoln Arts Trust	25.6*		15.6	4.1
Lincoln BIG	22.3*		8.8	2.5
Lincolnshire Home Independence Agency	23.8	£9k	10.5	3.3
Lincolnshire Housing Partnership	26.2	£115k	92.8	29.8
Magna Vitae Leisure Trust	14.9		247.0	104.5
Making Space	22.0		11.5	3.1
Mellors Catering Services	29.2		18.4	3.9
Nightingale Cleaning Ltd	30.4		1.3	0.2
Outspoken Training	31.5		1.4	0.4
Person Shaped Support	23.9		1.4	0.3
Platform Housing Group	26.0*	£659k	290.4	81.9
Serco	16.4	7.5%	625.6	168.8
Taylor Shaw (Branston)	31.3		11.6	2.1
Vinci	28.8		9.9	2.2

* indicates employer has ill health insurance with Legal and General therefore the actual rate paid is reduced by 1.75% for the insurance premium

Contribution payments are paid by the employers directly into the Lincolnshire Pension Fund bank account, and monthly data submissions are sent to the Fund's administrator, WYPF, through a secure portal.

The timely receipt of contribution payments and data submissions is monitored closely. Late payers (either in paying cash or in submitting data after the Funds deadline of the 19 of the month following payroll, or where the two elements do not agree) are reported quarterly to both the Pensions Committee and the Pension Board.

A policy is in place to fine employers where they are late in three of any six months over a rolling period, to cover additional administrative costs. However the Fund and its administrator work closely with employers to ensure that employers understand their responsibilities and the processes required to meet them. Over the year to 31 March 2020 there were 18 fines raised to employers.



Asset Pooling

Introduction

In the LGPS (Management and Investment of Funds) Regulations 2016, enacted in November 2016, the Government required all Local Government pension funds to combine their assets into a small number of asset pools, in line with guidance issued by the Secretary of State and meeting the four criteria set out below:

- a. Benefits of scale - a minimum asset size of £25bn;
- b. Strong governance and decision making;
- c. Reduced costs and value for money; and
- d. Improved capacity to invest in infrastructure.

These regulatory changes do not affect the sovereignty of the Lincolnshire Pension Fund, and the pooling of LGPS assets will have no impact on the employee contribution rates or pension entitlement of members of the fund (pensioners, current employees and previous employees who are yet to draw their pension).

Lincolnshire Pension Fund's Solution

Having assessed the various options available, it was decided that the Fund would pool its assets with eleven other like-minded funds, and create a new entity to implement the investment strategy and manage the investments. Some core principles were agreed at the very beginning, these included:

- One Fund one vote – regardless of size all Funds will be treated equally;
- Equitable sharing of costs;
- A fully regulated company; and
- To drive efficiencies and work effectively, partner funds must have a complimentary investment ethos, risk appetite and strategy.

The new entity was created by the partner funds, with experts appointed to ensure the structure would meet the needs of the Funds, the requirements of the Financial Conduct Authority (FCA) and the criteria set by Government.



Border to Coast Pensions Partnership

Border to Coast Pensions Partnership Ltd (Border to Coast) went live in July 2018 as a fully regulated asset management company, jointly owned by the twelve partner funds' administering authorities, with each Fund having an equal share in the company. Its role is to implement the investment strategies of the partner funds, through a range of investment sub-funds offering internally and externally managed solutions. Border to Coast is based in Leeds and has over 70 employees. This includes a large team to directly manage assets, alongside a team to select external managers. As an FCA regulated company, Border to Coast has to comply with all the requirements that any other asset manager has to, and is subject to company legislation.

Oversight and Governance

Border to Coast has twelve LGPS partner funds – Bedfordshire, Cumbria, Durham, East Riding, Lincolnshire, Northumberland, North Yorkshire, South Yorkshire, Surrey, Teesside, Tyne & Wear and Warwickshire, with assets in excess of £45bn as at March 2020. The Chairs of the Pensions Committees of these funds sit on a Joint Committee, to exercise oversight of the investment performance of the company and report back to, and take feedback from, the various Pensions Committees. In addition there is a scheme member representative that has a non-voting seat on the Joint Committee, who is nominated by the twelve Partner Funds' Local Pension Boards. The Joint Committee represents the Funds as investors in Border to Coast. As Border to Coast is jointly owned by the administering authorities of the Pension Funds, there is also a shareholder role that the authorities provide, and the responsibilities are all set out in a shareholder agreement. Pension Fund Officers provide day-to-day oversight and work closely with Border to Coast to ensure that the company provides the investment vehicles the funds need to implement their investment strategies.

Asset Transitions

As at 31 March 2020, the Lincolnshire Fund had transitioned assets into two sub-funds. The first transition took place in October 2019, when approximately £420m was transferred from three global equity managers (Columbia Threadneedle, Morgan Stanley and Schroders) to the Border to Coast Global Equity Alpha sub-fund. In February 2020 the second wave of assets was transitioned, with approximately £190m transferring from a passive bond portfolio managed by Blackrock to the Border to Coast Investment Grade Credit sub-fund. Further transitions are expected in 2020/21 into the UK Equity sub-fund and the Multi Asset Credit sub-fund.

Border to Coast set-up and running costs

The table below shows set-up costs incurred by the Fund this year and since inception:

	Direct £000's	Indirect £000's	2019/20 Total £000's	Since Inception Cumulative £000's
Recruitment				17.1
Legal				26.6
Procurement				36.2
Other support (e.g. IT)				2.0
Share purchase				833.3
Other working capital				
Staff costs				61.9
Other costs				41.3
Total Set-up Costs				1018.4
Governance		193.7	193.7	364.7
Implementation				239.4
Development		24.2	24.2	24.5
AUM		61.9	61.9	74.1
Total Running Costs		279.8	279.8	702.7
Total Costs to Date				1,721.1

*where assets have not yet been transitioned, AUM is a notional figure based on asset allocation

The costs identified above have been incurred as a result of creating Border to Coast in order to meet the Governments requirements, in a way suited to the core principles that the Fund and the partner funds agreed at the beginning of the pooling process. As stated above, there have been two transitions into Border to Coast Funds so far, but neither funds have been in place for one year yet (just five months and 1 month). As such, no material savings have been made. It is expected to be able to report on savings once these funds have been running for one year. However it is expected that, over the medium to longer term, investing with Border to Coast will create fee savings through reduced manager turnover and improve net of fee performance.

Border to Coast contact details:

Border to Coast Pensions Partnership
5th Floor, Toronto Square, Leeds, LS1 2HJ

More information can be found at their website at www.bordertocoast.org.uk



Annual Report of the LGPS Local Pension Board 2019/2020

Introduction

I am pleased to present the report of the Local Pension Board of Lincolnshire County Council (LCC) for the year 2019/2020.

Pension Boards were introduced in to the Local Government Pension Scheme (LGPS) from April 2015 under the Public Sector Pensions Act 2013 with the responsibility to assist administering authorities, in particular pension managers, and to secure compliance with the LGPS regulations.

The Lincolnshire Local Pension Board was established by the Administering Authority in June 2015 and operates independently of the Pensions Committee.

Purpose

The Board's role is to work closely in partnership and assist the Administering Authority in its role as Scheme Manager in relation to the following matters:

- Securing compliance with the Scheme Regulations and any other legislation relating to the governance and administration of the Scheme;
- Securing compliance with the requirements imposed by the Pension Regulator (tPR) in relation to the Scheme;
- Ensuring any breach of duty is considered and followed under the Scheme's procedure for reporting to tPR and to the Scheme Manager;
- Assisting the Scheme Manager to ensure the effective and efficient governance and administration of the Scheme; and
- Such other matters as the Scheme Regulations may specify.

Further detailed information on the Board's functions is set out in the Terms of Reference.

Constitution and Membership

The membership of the Board during the period was as follows:

- **Independent Chair** (non-voting)
Roger Buttery
- **2 Employer Representatives** (both voting)
Councillor Mark Whittington (Lincolnshire County Council)



Kirsty McGauley (Grantham College) – until July 2019
Gerry Tawton (Boston College) – from July 2019

- **2 Member Representatives** (both voting)

David Vickers

Ian Crowther – until July 2019

Kim Cammack – from July 2019

After serving four years on the Board, Kirsty McGauley and Ian Crowther were replaced with Gerry Tawton and Kim Cammack, respectively.

Three meetings were held within the period – 18 July and 3 October 2019, and 9 January 2020. Unfortunately, the meeting scheduled for the 19 March was cancelled as a result of the coronavirus restrictions. As a result of the short notice, there was insufficient time to make alternative arrangements for a virtual meeting. If the lockdown continues, the Board will look to make alternative arrangements to ensure that quarterly meetings can continue to be held.

All the Board Members have completed the Pension Regulator’s Public Service toolkit. All the Board Members have also attended a variety of externally organised conferences and seminars throughout the year as well as two internal training sessions on “Investment Beliefs and Update on Investment Strategy” and “Border to Coast UK Internal Equity Sub-Funds, Property & Residential Estate”.

The Work Programme

At each of the three meetings, the Board considered several standard reports. Lincolnshire’s compliance to the Code of Practice produced by tPR is regarded as a very important report.

The eleven elements of the Code are:

- a) Reporting duties;
- b) Knowledge and understanding;
- c) Conflicts of interest;
- d) Publishing information about schemes;
- e) Managing risk and internal controls;
- f) Maintaining accurate member data;
- g) Maintaining contributions;
- h) Providing information to members and others;
- i) Internal dispute resolution;
- j) Reporting breaches of the law; and
- k) Scheme advisory board.

A checklist of 99 items covering the above was produced in a traffic lights format. It is pleasing to report that Lincolnshire was largely compliant throughout the year. As at March 2020, there were

95 green and 1 not relevant. There were 3 partially compliant because certain aspects are outside direct control. The Board considered that the compliance to tPR's Code was very good.

Each quarter, the Board considered a report from the Business Development Manager (BDM) from the West Yorkshire Pension Fund (WYPF) on current administration issues within the Lincolnshire Pension Fund. The Key Performance Indicators (KPIs) are an important consideration. Throughout the year, the Board has been comfortable with the performance of WYPF and most of the KPIs have been in the 90%+ range.

At each meeting during the year, the BDM was questioned on the data scores as reported to tPR. At the January meeting, the scores were Common data 96.12% and Scheme Specific data 85.69%. The target is 100%, particularly for Common data. The Board continues to monitor WYPF's progress against an agreed data improvement plan including engaging the services of a tracing company in an attempt to track lost members.

The Board also noted that 99.6% of the Annual Benefit Statements had been issued to members by the statutory deadline. This was considered to be an excellent achievement. Although there is a concern over meeting the tPR's targets on data quality, overall, the Board's conclusion was that the administration continues to be sound.

At each meeting, the Board considered a report from the Head of Pensions on any current issues within the fund including investment matters and the employers' monthly submissions and contribution monitoring. As regards the latter, the Pensions Team remain content that the processes in place to monitor contributions are robust and at least as comprehensive as other LGPS Administering Authorities. I wrote to all employers and payroll providers in November 2019 reminding them of their statutory responsibilities for providing information to the Pension Fund as well as paying the contributions by the due date. The Pensions Team revisited its escalation processes to ensure that any issues are addressed at the earliest opportunity. For the vast majority of employers, the payment of contributions and the data submissions are made on a timely basis but there are a few outliers. During the year, there were 44 cases of the late payment of contributions and 143 cases of the late submission of the monthly returns. This is both disappointing and unacceptable but there is a recognition that it is important to work with the employers to attempt to resolve issues before taking further action. Efforts will therefore continue to remind employers/payroll providers of their duties and responsibilities through individual contact either in person, by email or telephone. The Board will keep this issue under close review.

The Board also took a keen interest in progress with the 2019 triennial actuarial valuation, including the assumptions to be used in the process. The Scheme Actuary gave a presentation at the October meeting on progress of the valuation, the initial results for the whole fund, the funding strategy and the next steps.

At the July meeting, consideration was given to the Pension Fund's draft Annual Report & Accounts for 2018/2019 which had been approved by the Pensions Committee on 18 July, 2019. The Board subsequently received a report from Mazars giving their opinion on the Pension Fund Accounts and Annual Report. The External Auditors had not identified any risks with regard to the management override of controls; valuation of unquoted investments for which a market price was not readily available; and key areas of managed judgements. The Board noted that Mazars had identified one unadjusted mis-statement, which was linked to the valuation of private equity and infrastructure

assets at the year end. It transpired that this unadjusted mis-statement occurred every year because of a time-delay in obtaining the data. The Fund’s accounting policy has been updated to address this issue. An unqualified audit opinion was issued on the Pension Fund Statement of Accounts. The Board concluded that the Report and Accounts was an excellent document.

Consideration was given to the Regulator’s “Governance and Administration Risks in Public Service Pension Schemes Engagement Report” which was a deep dive into the administration and governance of ten local government pension scheme funds. The good news is that the Lincolnshire Pension Fund was already delivering the key recommendations to a large extent.

Following her national and European successes last year, it is a pleasure to report that the Head of Pensions received the Outstanding Contribution of the Year Award at the LAPF Investment Awards. This is another excellent achievement for both Jo Ray and the Lincolnshire Pension Fund.

Conclusion

This is the fifth report of the Board. The Board considers the governance and administration of the Scheme to be sound. Lincolnshire’s compliance to the vast majority of tPR’s Code of Practice is particularly impressive. The Report and Accounts for 2018/2019 was an excellent document and there was an unqualified audit report. The Board will continue to monitor the national initiatives and LGPS pooling arrangements as the proposals unfold.

The Board would like to express its thanks to Jo Ray, Head of Pensions, her Team and the staff of the WYPF for the huge amount of work undertaken during the year. I should also like to record my thanks to both Kirsty McGauley and Ian Crowther for the hard work and support during their four-year term on the Board. Finally, I should like to thank the four Board Members for their considerable input and support during the year.

Roger BATTERY
Pension Board Chair
April 2020

Any questions regarding the Pensions Board or its work can be addressed through the Head of Pensions.

Jo Ray, Head of Pensions

Lincolnshire County Council, County Offices, Newland, Lincoln, LN1 1YL
Tel: 01522 553656 | email: jo.ray@lincolnshire.gov.uk

Information on Board membership and meetings can be found on the Council's website:
<http://lincolnshire.moderngov.co.uk/>



Lincolnshire County Council Pension Fund

Actuarial Statement for 2019/20

This statement has been prepared in accordance with Regulation 57(1)(d) of the Local Government Pension Scheme Regulations 2013. It has been prepared at the request of the Administering Authority of the Fund for the purpose of complying with the aforementioned regulation.

Description of Funding Policy

The funding policy is set out in the Administering Authority's Funding Strategy Statement (FSS), effective from 19 March 2020. In summary, the key funding principles are as follows:

- to ensure the long-term solvency of the Fund, using a prudent long term view. This will ensure that sufficient funds are available to meet all members'/dependents' benefits as they fall due for payment;
- to ensure that employer contribution rates are reasonably stable where appropriate;
- to minimise the long-term cash contributions which employers need to pay the Fund, by recognising the link between assets and liabilities and adopting an investment strategy which balances risk and return (this will also minimise costs to be borne by Council Tax payers);
- to reflect the different characteristics of different employers in determining contribution rates. This involves the Fund having a clear and transparent funding strategy to demonstrate how each employer can best meet its own liabilities over future years; and
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on pension obligations.

The FSS sets out how the Administering Authority seeks to balance the conflicting aims of securing the solvency of the Fund and keeping employer contributions stable. For employers whose covenant was considered by the Administering Authority to be sufficiently strong, contributions have been stabilised to have a sufficiently high likelihood of achieving the funding target over 20 years. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is at least a 71% likelihood that the Fund will achieve the funding target over 20 years.

Funding Position as at the last formal funding valuation

The most recent actuarial valuation carried out under Regulation 62 of the Local Government Pension Scheme Regulations 2013 was as at 31 March 2019. This valuation revealed that the Fund's assets, which at 31 March 2019 were valued at £2,353 million, were sufficient to meet 93% of the

liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. The resulting deficit at the 2019 valuation was £183 million.

Individual employers' contributions for the period 1 April 2020 to 31 March 2023 were set in accordance with the Fund's funding policy as set out in its FSS. Contributions have the aim of achieving full funding within an appropriate time horizon and with an appropriate likelihood of success.

Principal Actuarial Assumptions and Method used to value the liabilities

Full details of the methods and assumptions used are described in the 2019 valuation report.

Method

The liabilities were assessed using an accrued benefits method which takes into account pensionable membership up to the valuation date; and makes an allowance for expected future salary growth to retirement or expected earlier date of leaving pensionable membership.

Assumptions

A market-related approach was taken to valuing the liabilities, for consistency with the valuation of the Fund assets at their market value.

The key financial assumptions adopted for the 2019 valuation were as follows:

Financial assumptions	31 March 2019
Discount rate	4.0%
Salary increase assumption	2.6%
Benefit increase assumption (CPI)	2.3%

The key demographic assumption was the allowance made for longevity. The life expectancy assumptions are based on the Fund's VitaCurves with improvements in line with the CMI 2018 model, an allowance for smoothing of recent mortality experience and a long term rate of 1.25% p.a. Based on these assumptions, the average future life expectancies at age 65 are as follows:

	Males	Females
Current Pensioners	21.4 years	23.7 years
Future Pensioners*	22.4 years	25.2 years

* aged 45 at the 2019 valuation

Copies of the 2019 valuation report and Funding Strategy Statement are available on request from the Administering Authority to the Fund.

Experience over the period since 31 March 2019

Markets were disrupted by COVID 19 which resulted in volatile market conditions towards the end of the financial year. As a result, the funding level of the Fund as at 31 March 2020 has reduced versus that reported in the previous formal valuation.

The next actuarial valuation will be carried out as at 31 March 2022. The Funding Strategy Statement will also be reviewed at that time.

Prepared by **Gemma Sefton FFA**
For and on behalf of Hymans Robertson LLP
19 May 2020

Hymans Robertson LLP, 20 Waterloo Street, Glasgow, G2 6DB

Investment Background

Returns for Major Markets

The twelve months to 31 March 2020 produced a split of returns asset classes, with equities suffering particularly badly in the last quarter of the year due to the coronavirus pandemic.

Equity market returns were all negative, ranging from -18.5% in the UK to -2.2% in the US.

Bond asset returns were positive, with UK Gilts and Index Linked Gilts returning 9.9% and 2.2% respectively, and UK Corporate Bonds remaining flat.

UK Commercial Property returns were flat over the year.

Investment Returns to sterling based investors 1 April 2019 to 31 March 2020

Asset Class	Index	Index return to sterling investors %
Equities		
United Kingdom	FTSE All Share	(18.5)
Global Equities	FTSE World	(6.2)
United States	S&P 500	(2.2)
Europe ex UK	FTSE Developed Europe	(7.8)
Japan	TOPIX	(2.5)
Emerging Markets	FTSE Emerging	(13.0)
Fixed Interest		
UK Gilts	FTSE UK Gilts	9.9
UK Index Linked Gilts	FTSE Index-Linked	2.2
UK Corporate Bonds	IBoxx Sterling Non-Gilts All Stocks	0.0
UK Commercial Property	IPD Index	0.0
Cash	LIBID Seven Day Rate (compounded)	0.5

World Equity Markets

Global equity markets reported losses over the twelve months to March 2020 (in GBP terms), with US equities outperforming their European counterparts.

A brief summary of the highlights of each quarter of the financial year is shown below:



Quarter 2 2019

In the second quarter of 2019, global stock markets ended in positive territory. While markets performed well in April and June, the month of May recorded a negative performance. Continued fears of a trade war between the US and China weighed on markets mid-quarter as the US threatened increased tariffs and accused China of backpedaling. In June, international markets rose steadily, soothed by an improving outlook for global economic growth, the prospect of resolving US-Sino trade relations and a more accommodative monetary policy.

Quarter 3 2019

Continuing its bull run, equity markets started slightly positive into the second half of 2019. While markets posted gains in July they tumbled significantly in August. September saw a recovery that was able to offset the losses. Fears of trade war were still in place, however, stocks benefitted from an accommodative central bank policy which saw the restart of the quantitative easing (QE) in Europe and further rates cuts by the US Federal Reserve.

Quarter 4 2019

Finally, equity markets finished off the calendar year in positive territory amid receding fears of a global recession. The optimistic environment helped ease concerns that global economic growth was losing momentum. This trend continued, as policies from central banks remained supportive and investors expected that low interest rates would be in place for longer. Finally, with an agreement of the phase one trade deal and an emphatic victory for the UK's Conservative Party, global equity markets saw a positive December and ended the year of 2019 with substantial gains.

Quarter 1 2020

After the long bull run, equity markets experienced a sell-off at the start of 2020 where global stocks ended in slightly negative territory during the first month of the year. Even though the new year began with strong market performance, due to positive macro-economic data, this positive news was dampened by the outbreak of a deadly virus in China, the coronavirus. China imposed lockdowns on different cities and regions around the source of the disease with possible effects on the global supply chain. In the UK, Brexit finally happened but still many questions around the future relationship between the UK and Europe remained open. The transition phase in order to get a proper deal between the two parties would last a minimum of one full year. Stocks worldwide kept falling in the following months due to the fact that the spread of the coronavirus was now also accelerating outside of China. Therefore all equity market sectors saw a decline with the worst hit being the most cyclical parts of the market. Sentiment got increasingly worse and market participants flocked towards perceived 'safe haven' assets. Core government bonds and commodities such as gold were the main beneficiaries against this backdrop, with government bond yields across several countries reaching new lows and gold surging to near all-time highs. Central banks reacted to the outbreak and said that they would consider policy measurements to respond to a possible economic slowdown.

These developments finally peaked in March where global equity markets marked one of the worst months in history, as the human and economic cost of the Covid-19 pandemic mounted. In addition to the market uncertainty, oil prices sunk to historical low levels as the OPEC and Russia could not agree on the amount of supply.



Central banks around the world delivered on their statements and took aggressive action to support local markets, as well as the global economy as a whole, as world-wide recessionary fears grew. The US Federal Reserve (Fed) slashed interest rates close to zero while the Senate passed a US\$2 trillion coronavirus aid bill. Separately, in an emergency meeting, the European Central Bank (ECB) announced €750bn in asset purchases under a new emergency program.

Fixed Interest

A brief summary of each quarter of the financial year is shown below.

Q2 2019

Amid continuing trade tensions and economic growth worries, government bonds benefited from supportive comments from global central banks. US Treasuries rallied strongly as markets priced-in up to three Fed interest rate cuts over the next year. The ECB was increasingly expected to cut interest rates too. It had indicated it would also initiate a new asset-buying programme. This helped regional government bonds. German bunds performed well over the period. The 10-year yield plummeted to a new negative record-low (prices climbed). Meanwhile, UK government bonds rose, partly on the back of increased fears of a 'no-deal' Brexit.

Global corporate bonds continued to rally in the second quarter. While credit spreads tightened modestly, the more important driver was a sharp reduction in Treasury yields. In particular, the 10-year US Treasury yield fell by more than 0.4% to 2%, in line with priced in US interest rates cuts in the next 12 months. On the trade front, President Trump's unexpected decision to increase China import tariffs again in early May hurt sentiment. However, in the final few days of June, the US and China announced a new 'truce' in the trade war at the G20 summit.

Q3 2019

Global government bond indices posted gains over the quarter. In August, prices in the 'core' markets of the US, Germany and the UK moved sharply higher. This was in reaction to a variety of concerns. Chief among them was the threat of global recession and anxiety over the escalation of the US-China trade dispute. Politics also played a part, including turmoil in Italy and the on-going Brexit saga in the UK. During September, US Treasuries reversed direction, delivering their worst monthly performance in a year. The catalyst was a reassessment by the Fed of its outlook for interest rates. While there was a 0.25 percentage point cut mid-month, in the accompanying statement the Fed said it anticipated no further rate cuts in 2019.

Global corporate bonds continued to rally in the third quarter, driven by a sharp reduction in US Treasury yields (prices rose). In particular, the 10-year yield fell by a further 0.33% to 1.67%. This was a substantial 1.4% lower than a year earlier and reflected growing economic concerns. As a result, corporate bonds were seen as a more attractive investment than Treasuries. It was a similar story in Europe, where increasingly negative German bund yields were the main positive driver of European corporate bond returns.



Q4 2019

Global government bond yields rose, and prices fell. In October, an increase in UK gilt yields reflected heightened expectations that the country would avoid a no-deal Brexit. During November, the main influence on markets was the prospect of a thaw in the trade war between the US and China. Government bond prices continued to fall in December. As investors became more optimistic about the world's economic prospects, they moved into riskier assets that were expected to deliver better returns. As a result, they shunned defensive assets such as government bonds.

Global corporate bonds were up for the quarter, thanks to a number of factors. US and Eurozone manufacturing business surveys picked up a little over the period, albeit remaining weak. Additionally, overall US employment held up well, with 200,000 jobs added in November. On the political front, a 'phase one' US-China trade deal was positive for sentiment, as was the Conservative Party's emphatic UK election victory. These were all good for risk assets such as corporate bonds.

Q1 2020

Global government bond yields fell sharply, and prices rose. This was caused primarily by the coronavirus outbreak, and fears over the resultant potential damage to global economic growth. As a consequence, investors sold equities and other risk assets, instead electing to channel their money into the perceived safety of global government bonds. Central banks across the world cut interest rates and initiated stimulus programmes to mitigate the economic effects of Covid-19, and yields moved to historic lows in major government bond markets.

Like most other risk assets, global corporate bonds had a torrid time in the first quarter. While returns were still positive for most of the first two months, performance became markedly more negative from late-February onwards. This reflected the growing realisation of the hugely damaging economic consequences of the escalating coronavirus pandemic. By the end of March, analysts expected most leading global economies would experience very sharp recessions in 2020. With default risks on global bonds jumping, March saw a huge widening in corporate bond spreads. This led to one of the worst monthly performances on record, which severely impacted quarterly returns.

UK Commercial Property

A brief summary of each quarter of the financial year is shown below.

Q2 2019

It was a fairly subdued quarter for UK commercial real estate. While total returns remained positive, the market has slowed as real estate transactions have been relatively weaker. Heightened macroeconomic uncertainty and no clear Brexit solution created a state of inertia in the market. Given these challenges, investors had been trying to de-risk their commercial real estate allocations. Industrials remained the best-performing sector, although returns slowed here too. As at the end of May, returns from industrials in the South East had more than halved from a year ago.



Q3 2019

Total returns at an 'all property' level remained positive, but UK commercial real estate weakened further this quarter. While a summer lull was not abnormal, transaction volumes were particularly low. The weaker deal flow continued into September. Prolonged macroeconomic and political uncertainty was stifling market activity and affecting investor sentiment. A wide spread of returns at the sector level persisted, with retail in negative territory and industrials significantly outperforming – especially in the South East.

Q4 2019

The UK commercial real estate market remained on a similar trajectory for most of the year. The annual All Property total return for 2019 was significantly lower than that recorded in 2018. Investors were reducing risk in their real estate portfolios in response to weaker economic growth forecasts and lower future returns. There was still a strong appetite for long lease agreements secured against strong covenants and prime assets, as investors sought stable income streams. However, there was more caution over secondary assets with vacancy, capital expenditure requirements, development risk, tenant turnover or other looming risk events.

Q1 2020

It was a slow start to the year for UK property, with transaction volumes quickly losing steam following the outcome of the December 2019 general election. According to the MSCI Monthly Index, total returns in January and February were 0.3%. That said, the performance figures were yet to reflect the significant impact of the Covid-19 pandemic and the economic disruption from containment measures put in place by the government. Lending against real estate assets was slowing dramatically and the issuance of new debt was grinding to a halt.

Administration of Benefits

The shared service arrangement with West Yorkshire Pension Fund (WYPF) to provide Pensions Administration services for the Lincolnshire Pension Fund is now five years old. This arrangement was made to improve efficiency and reduce costs in the provision of the Pensions Administration service, and this is being seen.

A satellite office for the WYPF administration team is based in Lincoln, co-located with the LCC Pension Fund team, to enable scheme members to have a point of contact in Lincolnshire. Members are always able to visit County Offices and speak to someone regarding their pension arrangements.

The monthly data return from employers is a considerable benefit to the administration process, and has improved the quality of data held in the administration system, enabling a better service to be provided to scheme members. However some employers and their payroll providers still need to improve their own processes for submitting accurate data. WYPF continues to work with the Lincolnshire Fund and its employers to improve all aspects of administering the scheme.

The Pensions Committee and Pension Board take a keen interest in the administration of the Fund, and receive regular reports and presentations (see the Board's annual report on [p29](#)) on all aspects of the administration service.

The Head of Pensions is part of the overall shared service management team, and attends the bi-monthly management review meetings held in Bradford. In addition, as part of the overall governance of the service, the Head of Pensions and Executive Director of Resources sit on the Collaboration Board of the shared service, alongside the senior management of WYPF, to ensure that the original aims of the partnership with WYPF are met.

The service is monitored through a number of performance indicators. These are detailed in the table below, showing the performance achieved over the last year against the expected performance, and highlighted with a red, amber or green to show where expectations have not been met. Performance is reported quarterly to the Pensions Committee and Pension Board, and regular meetings are held between LCC and WYPF to understand and manage any performance issues. The critical business areas impacting on pensioners and their family take priority, these being members requiring immediate payment for retirements, redundancies, dependents pensions and death grants.

Key Service Performance Indicators and Direction of Travel

Event	No. Cases	Target Days to Complete	Cases Target Met	Minimum Target %	Target Met %	Average Days Taken	Travel
AVC in-house	375	10	367	85	97.9	1.3	↑
Age 55 Increase	9	20	7	85	77.8	18.6	↔
Change of address	1,279	5	1,244	85	97.3	0.7	↑
Change of bank details	361	5	313	85	86.7	2.8	↓
Death grant nomination received	3,869	20	3,829	85	99.0	3.8	↑
DWP request for information	65	10	61	85	93.4	4.1	↓
Death grant set up	109	5	106	85	97.3	1.1	↑
Death in retirement	575	5	539	85	93.8	2.3	↑
Death in service	20	5	17	85	85	2.3	↓
Death in deferment	42	5	39	85	92.9	5.3	↑
Deferred benefits into payment – actual	1,781	5	1,486	90	83.4	3.2	↓
Deferred benefits into payment – quote	2,095	35	2,029	85	96.9	6.7	↑
Deferred benefits set up on leaving	4,243	10	3,918	85	92.3	8.8	↓
Divorce quote	206	20	202	85	98.1	4.2	↑
Divorce settlement – pension sharing order implemented	5	80	5	100	10	0.4	↔
Estimates for deferred benefits into payment	48	10	41	90	85.4	6.4	↑
General Payroll Changes	525	5	509	85	97.0	1.6	↑
Initial letter death in service	20	5	20	85	100	1	↔
Initial letter death in retirement	575	5	570	85	99.1	1.3	↑
Initial letter death in deferred	42	5	40	85	95.2	2.4	↑
Life certificate received	2	10	1	85	50	10	↓
Monthly posting	3,469	10	3,344	95	96.4	1.8	↑
NI adjustment at state pension age	33	20	32	85	97.0	13.8	↓
Pension estimate	618	10	520	75	84.1	6.5	↓
Refund payment	1,002	10	985	95	98.3	1.0	↑
Refund quote	1,282	35	1,237	85	96.5	5.1	↑

Event	No. Cases	Target Days to Complete	Cases Target Met	Minimum Target %	Target Met %	Average Days Taken	Travel
Retirement actual	663	3	613	90	92.5	1.0	↓
Spouse – set up new pension	287	5	262	85	91.3	4.4	↑
Spouse potential	38	20	37	85	97.4	6.1	↑
Transfer in payment received	190	35	182	85	95.8	11.5	↑
Transfer in quote	236	35	234	85	99.2	2.9	↓
Transfer out payment	99	35	92	85	92.9	11.4	↑
Transfer out quote	487	20	431	85	88.5	10.7	↑

As can be seen from the table above, overall performance has generally met or exceeded targets (green direction of travel arrow). Those areas that have a red direction of travel arrow are where the performance target has not been met, however in two of those cases the performance has improved or remained the same (Estimates for deferred benefits into payment and Age 55 Increase).

The only two areas where performance has worsened from last year and targets have not been met are shown below, and neither has provided the Fund with any cause for concern:

- Estimates for deferred benefits into payment – This has improved from last year's performance of only 64% and now stands at 85%. Whilst it is still slightly behind the target of 90% the improvement over the year is considerable.
- Life certificate received – there were only two received in the year and one was over the target, causing the performance to drop to 50% from 88% last year when a larger number were received.

Industry standard performance indicators

The service is also monitored against industry standards and national averages. These are not directly comparable to the figures above as they are measured at different points, but do provide a useful indicator of the overall level of service in comparison to others.

Industry Standard Performance Indicators	Target days	Achieved %	National average %
Letter detailing transfer in quote	10	99.7	83.8
Letter detailing transfer out quote	10	77.6	84.4
Process and pay refund	5	97.8	94.1
Letter notifying estimate of retirement benefit	10	84.0	79.3
Letter notifying actual retirement benefit	5	92.8	87.0

Industry Standard Performance Indicators	Target days	Achieved %	National average %
Process and pay lump sum retirement grant	5	98.9	89.0
Letter acknowledging death of a member	5	95.7	87.8
Letter notifying amount of dependants benefit	5	96.9	84.8
Calculate and notify deferred benefit	10	90.2	75.3

New Pensions Paid

New pensions paid over the financial year are shown below, both from an active member status and a deferred member status. This is split across the various types of events that can cause a retirement:

- Normal – retirement at normal retirement age (NRA)
- Early – retirement before NRA – generally with reduced benefits
- Late – retirement after NRA – generally with increased benefits
- Ill health – release of pension through certified ill health
- Redundancy – release of pension from age 55 when made redundant

New pensions paid	2019/20 Member numbers
Active Status	
Normal	239
Early	380
Late	85
Ill health	28
Redundancy	28
Total active	760
Deferred status	
Normal	513
Early	1,136
Late	15
Ill health	10
Total deferred	1,674

Pension Overpayments

Occasionally, pensions are paid in error. When this happens, processes are in place to recover the overpayments. The table below shows a summary of the value of the overpayments involved. Every effort is made to recover these, whilst managing the financial impact on the overpaid pensioners.

Overpayments	2019/20 £'000
Annual payroll	80,400
Overpayments value	48
Overpayments written off	2
Overpayments recovered	40

The table below shows a summary of transactions processed during the year:

Analysis of overpayments	2019/20 Number of payments
Pensions paid during period	297,587
Cases overpaid	43
Cases written off	8
Cases recovered	33

Fraud Prevention – National Fraud Initiative

Lincolnshire Pension Fund, West Yorkshire Pension Fund and Hounslow Pension Fund, with a number of Fire authorities, are in shared service arrangement hosted by West Yorkshire Pension Fund. The Funds participate twice a year in the National Fraud Initiative (NFI). The data that is submitted includes pensioners, beneficiaries and deferred member information for Local Government Pension Scheme and Fire Services Pension members managed by the Fund.

A summary of the latest NFI results for the whole shared service is shown below:

Pensioners, beneficiaries and deferred members	No. of records sent	No. and percentage of mismatches	Over payments identified	Possible frauds	Mismatches carried forward at 31 March
2019/20	277,293	3,845 1.4%	17	2	10
2018/19	260,387	3,339 1.3%	3	2	2
2017/18	229,994	518 0.2%	35	2	10
2016/17	224,122	1,425 0.6%	5	4	5
2015/16	219,313	868 0.4%	61	3	10

Value for money - Cost per member

The latest published data (2018/19) for all LGPS funds administration costs shows that LPF pensions administration cost per member is £14.12, the 4th lowest cost amongst 88 LGPS funds and well below the national average of £20.28

In 2018/19 LPF had a below average total cost per members (administration, investment and oversight & governance) at £137.91, the national average for LGPS in 2018/19 is £222.27.

Cost per member 2018/19	Position	Lincolnshire Pension Fund	LGPS Lowest	LGPS Highest	LGPS Average
Administration	4 th	£14.12	£1.61	£60.98	£22.28
Investment	19 th	£118.02	£16.53	£566.69	£189.59
Oversight and governance	20 th	£5.77	£0.00	£42.19	£10.39
Total Cost per member	13th	£137.91	£34.46	£634.93	£222.27

The 2019/20 annual cost of administering the Lincolnshire Pension Fund per member is £16.88, investment management cost per member is £137.78, oversight and governance cost per member £7.83 and the total management cost per member is £162.49. These figures compare favourably with the average cost for authorities in the MHCLG – SF3 results for 2018/19 as shown in the table above.

Staffing

The table below identifies the numbers of staff across the areas of the shared service providing the administration service.

Shared service staff full time equivalent (FTE)	2016/17	2017/18	2018/19	2019/20
Service Centre	54.7	58.1	59.5	54.8
Payroll	16.6	19.0	17.6	16.1
ICT	12.6	13.7	14.4	15.4
Finance	14.0	16.0	14.5	12.0
Business support	26.0	27.4	28.8	28.4
Technical	4.5	3.9	4.9	4.9
Total	128.4	138.1	139.7	131.6



Key activities undertaken during the year

Employer workshops

The free one-day and half-day workshop sessions for employers are a regular part of the training and support offered. Four different types of workshops were provided for employers over the year:

- Complete guide to administration (half day)
- Secure administration (half day)
- Employer Responsibilities (half day)
- Ill Health Retirement
- Pensionable Pay

The workshops were delivered by the shared service WYPF staff and were designed to give employers a good understanding of the pension scheme. Feedback from participants on these events has been very positive again.

Workshop on 'Planning for a positive retirement'

The workshops run by Affinity connect, to support and guide members who are considering what retirement might mean to them, continue to be well attended.

The workshops raise awareness of key issues to consider and the decisions that members need to make as they approach this new stage in their life. It is especially useful for members thinking of retiring in the next couple of years, but valuable even if they're not yet sure when they want to retire.

Pension Increase

Each year, LPF pensioners receive an annual increase in accordance with pension increase legislation. The increase is linked to movements in the Consumer Price Index (CPI). Deferred members benefits are also increased by CPI. For the 2019/20 year an increase of 2.4% was applied on 8 April 2019.

Pension administration and cost

As in previous years, the workload for pension administrators continued to increase and member numbers continue to rise across the shared service with WYPF.

The shared service delivery continues to be underpinned by its accreditation to the International Organisation for Standardisation - ISO 9001:2000. The quality management systems ensure that the shared service is committed to providing the best possible service to customers, and will continue to ensure that it delivers best value to all stakeholders. The latest published data for all LGPS funds

administration costs shows that LPF pensions administration cost per member is £14.12, this is the 4th lowest cost amongst 88 LGPS funds and well below national average of £22.28

Accreditation

The shared service partnership achieved accreditation for ISO27001 Information Security Management System Certification (ISMS). This accreditation is particularly important to the shared service and highlights the continued commitment to information security and provides assurance to all partners that their data and reputation is protected.

Communications

The contact centre hosted in Lincoln and in Bradford continues to be a popular way for members to communicate with the Fund about their pensions.

All annual pension benefit statements for active and deferred members were produced on time giving members information on their benefits accrued to date and what their potential benefits will be at retirement age, as well as other useful information. Positive feedback was received from members with the new inclusion of information on pensions payable at ages 55, 60, 65 and state pension age, which included any reduction for early payment.

Regular newsletters continue to be issued to members to keep them informed of important pensions news.

The shared service has Facebook and Twitter accounts to encourage members of all ages to engage more with the Fund through social media.

MyPension

With the shared services 'MyPension' service (accessible on the shared website) members can view their pension record and statements, update personal details, tell us they've moved house and more. Members are being encouraged to sign up as the service moves to more online communications.

Data quality

This year LGPS Funds were required to report on their data quality to the Pensions Regulator as part of the annual scheme returns. The Pensions Regulator has set a target of 100% accuracy for new common data received after June 2010.

Current data quality figures for LPF are shown below:

Common data field	Data score %
Forename	100
Surname	100

Membership status	99.9
Date of birth	100
NI number	99.9
Address	96.1
Postcode	99.9

Much work is being undertaken to improve address data and this work will continue over the next twelve months and beyond.

Disaster recovery and risk management monitoring

The shared service partnership systems are hosted by WYPF which is administered by Bradford Council. Bradford Council uses a pair of geographically separated data centres, which are 3.2km apart. Both purpose-built data centres are protected by redundant power, UPS, a backup generator and cooling. The data centres are connected by point-to-point council-owned fibre runs. Datacentres have secure access systems and are monitored 24/7 by Bradford’s CCTV Unit. Both sites are permanently live and accessible to the internal end users who are networked to the sites via diverse fibre cable routes. Where possible, servers are virtualised, using Microsoft Hyper-V. The servers and data are replicated between the Hyper-V hosts at both sites to ensure a short recovery time.

Data is backed up to disk medium in a 24-hour cycle and written to tape archive on robotic tape libraries at both sites. An encrypted archive copy is sent to a dedicated offsite storage facility every week. WYPF’s server, disk and core network infrastructure is monitored for errors and warnings, and these generate a ticket on the WYPF IT ITIL system for investigation and resolution. Critical data stores are also replicated at disk level between sites. In the event of serious system failures WYPF would re-provision testing hardware and infrastructure environment for live running.

In the event of WYPF office accommodation becoming unavailable, staff will be relocated to other council offices or work remotely, including the remote office is in Lincoln. WYPF is covered by Bradford Council’s comprehensive disaster recovery plan for all services they deliver for the shared service.

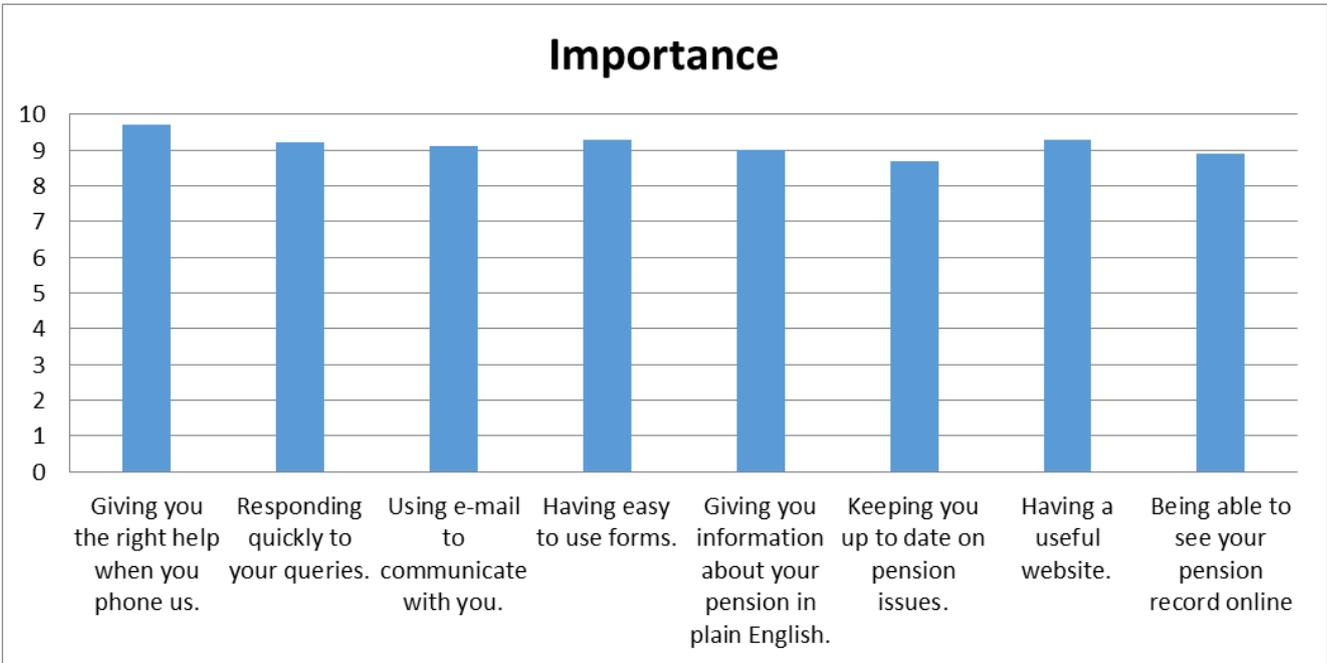
Customer satisfaction

Customer surveys are regularly sent to a sample of scheme members that have contacted the service centre or been involved in an event (e.g. retirement). In addition, the website has an online form for completion to obtain feedback.

The quarterly scores are presented to the Pensions Committee and Pension Board, in order to monitor satisfaction with the shared service by the end users. The table below shows the scores for the year.

April – June 2019	July - Sept 2019	Oct - Dec 2019	Jan - March 2020
83.5%	87.9%	84.5%	78.7%

The charts below show how members rate the importance of and satisfaction with the various services described below:





Summary of LGPS Contributions and Benefits

The LGPS is a defined benefit scheme, however there are three different benefit tranches, based on when scheme changes were brought in with new regulations. The three tranches are Pre 2008, April 2008 to March 2014 and Post April 2014. The benefits scheme members will be entitled to will depend upon when they joined and left the LGPS – and scheme members may have benefits across all three tranches.

Membership from 1 April 2014

Membership of the LGPS is available to all contracted employees of participating employers whether whole time or part time. Casual employees may also be members providing their contract of employment is for a minimum of three months. Whilst membership of the Scheme is not compulsory, employees of Scheme employers who are eligible are deemed to have joined unless they specifically opt out, whilst employees of transferred Admission Bodies are eligible only if they are employed in connection with the service transferred.

National legislation and regulation cover the LGPS including the benefit entitlements of Scheme participants and their families. Such benefits are not linked to the investment performance of the Fund. Key features of the contributions payable and the benefits available are outlined below.

Contributions

Employee's contribution rates from 1 April 2014 are based on actual pensionable pay using the pay band table below. The bands are increased each April in line with inflation by the Ministry of Housing, Communities and Local Government. The bands, as they stood at 31 March 2019, are shown below.

Full Time Equivalent Pay	Contribution Rate
Up to £14,100	5.5%
More than £14,100 and up to £22,000	5.8%
More than £22,000 and up to £35,700	6.5%
More than £35,700 and up to £45,200	6.8%
More than £45,200 and up to £63,100	8.5%
More than £63,100 and up to £89,400	9.9%
More than £89,400 and up to £105,200	10.5%
More than £105,200 and up to £157,800	11.4%
Over £157,800	12.5%



Benefits

The retirement age for scheme members is their Normal Pension Age which is the same as their State Pension Age (but with a minimum of age 65). However, employees may retire and draw their pension at any time between age 55 and 75. If an employee chooses to retire before their Normal Pension Age it will normally be reduced, as it is being paid earlier, and if taken later than Normal Pension Age then it will be increased, as it is being paid later. Retirement before age 55, other than on ill-health grounds, is not possible.

Annual Pensions

Pensions are calculated at a rate of 1/49 of the employee's pensionable pay in each scheme year. Inflation increases will be added to ensure that pension accounts keep up with the cost of living.

Lump Sum Payments

A member receives a tax free lump of three times their pension on service accrued prior to 1 April 2008. On service from 1 April 2008 there is no automatic lump sum, but members have the option to commute pension at the rate of £12 cash lump sum for every £1 pension given up, subject to maximum tax free lump sum of 25% of the capital value of accrued benefits at retirement.

Ill Health Retirement

There are three tiers of benefits. The benefits are calculated as for normal retirement with additional service under tiers one and two. The three tiers are explained below:

Tier 1 – The member is unlikely to be capable of gainful employment before Normal Pension Age. Benefits are based on the pension already built up at the date of leaving the scheme, plus the pension that would have built up, calculated on assumed pensionable pay, had they been in the main section of the scheme until reaching Normal Pension Age.

Tier 2 – The member is unlikely to be capable of gainful employment within three years of leaving, but is likely to be capable of undertaking such employment before Normal Pension Age. Benefits are based on the pension already built up at the date of leaving the scheme, plus 25% of the pension that would have built up calculated on assumed pensionable pay, had they been in the main section of the scheme until reaching Normal Pension Age.

Tier 3 – The member is likely to be capable of gainful employment within three years of leaving, or before Normal Pension Age if earlier. Benefits are based on the pension already built up at leaving. Payment of these benefits will be stopped after three years, or earlier if the member is in gainful employment or becomes capable of such employment, provided Normal Pension Age has not been reached by then.

Death-benefits

Death in service attracts a tax free lump sum of three times final pensionable pay. An annual pension is payable to a spouse/civil partner/co-habiting partner (when meeting certain criteria) and eligible children, however civil partners and co-habiting partners pensions are based on post 5 April 1988 membership only. If a member dies within ten years of their retirement (or up to age 75), a



single lump sum payment is made of ten times the member's annual pension, less any pension paid since retirement. For a member who retired prior to 1 April 2008 and dies within five years of their retirement, a single lump sum payment is made of five times the member's annual pension less any pension paid since retirement. The surviving spouse is entitled to an annual pension based on 1/160 accrual of the member's membership.

Supplementary Pensions

Scheme members may purchase additional pension of up to a maximum of £6,822 per annum, in blocks of £250, through Additional Pension Contributions (APCs.). As an alternative, Scheme members may increase their benefits by paying Additional Voluntary Contributions (AVCs). The AVC provider, appointed by the County Council as the administering authority, is Prudential.

Membership from 1 April 2008 to 31 March 2014

Membership of the LGPS was available to all contracted employees of participating employers whether whole time or part time. Casual employees may also have been members, providing their contract of employment was for a minimum of three months. Whilst membership of the Scheme was not compulsory, employees of Scheme employers who were eligible were deemed to have joined unless they specifically opted out, whilst employees of transferred Admission Bodies were eligible only if they were employed in connection with the service transferred.

National legislation and regulation covered the LGPS, including the benefit entitlements of Scheme participants and their families. Such benefits were not linked to the investment performance of the Fund. Key features of the contributions payable and the benefits under this tranche are outlined below:

Contributions

Employees contributed between 5.5% and 7.5% of their pensionable pay towards their pension.

Benefits

The retirement age for scheme members was 65. However, employees could retire between 60 and 65 but would suffer a reduction to their benefits (unless protected under the 85 year rule). Retirement before age 60*, other than on ill-health grounds, was not possible without the permission of the employer (*superseded by LGPS (Amendment) Regulations 2018, with effect from 14 May 2018, to enable deferred members to take their pension from age 55 (with reductions) without employer consent).

Annual Pensions

Pensions were calculated at a rate of 1/60 of the employee's average 'final' pay in their last twelve months of employment for each year of pensionable service. Pensions for persons aged 55 and over (no age restriction for ill-health) were increased each April in line with inflation.



Lump Sum Payments

On service from 1 April 2008 there was no automatic lump sum, but members had the option to commute pension at the rate of £12 cash lump sum for every £1 pension given up, subject to maximum tax free lump sum of 25% of capital value of accrued benefits at retirement.

Ill Health Retirement

There are three tiers of benefits. The benefits are calculated as for normal retirement with additional service under tiers one and two. The three tiers are explained below:

Tier 1 – The member is unlikely to be capable of gainful employment before Normal Pension Age. Benefits are based on the pension already built up at the date of leaving the scheme, plus the pension that would have built up, calculated on assumed pensionable pay, had they been in the main section of the scheme until reaching Normal Pension Age.

Tier 2 – The member is unlikely to be capable of gainful employment within three years of leaving, but is likely to be capable of undertaking such employment before Normal Pension Age. Benefits are based on the pension already built up at the date of leaving the scheme, plus 25% of the pension that would have built up calculated on assumed pensionable pay, had they been in the main section of the scheme until reaching Normal Pension Age.

Tier 3 – The member is likely to be capable of gainful employment within three years of leaving, or before Normal Pension Age if earlier. Benefits are based on the pension already built up at leaving. Payment of these benefits will be stopped after three years, or earlier if the member is in gainful employment or becomes capable of such employment, provided Normal Pension Age has not been reached by then.

Death-benefits

Death in service attracted a tax free lump sum of three times final pensionable pay. An annual pension was payable to a spouse/civil partner/co-habiting partner (when meeting certain criteria) and eligible children, however civil partners and 'nominated' dependent partners pensions are based on post 5 April 1988 membership only (now superseded to allow payment without a nomination form). If a member died within ten years of their retirement (or up to age 75), a single lump sum payment was made of ten times the member's annual pension, less any pension paid since retirement. The surviving spouse was entitled to an annual pension based on 1/160 accrual of the member's membership.

Supplementary Pensions

Scheme members could purchase additional pension of up to a maximum of £6,755 per annum, in blocks of £250, through Additional Pension Contributions (APCs). As an alternative, Scheme members could increase their benefits by paying Additional Voluntary Contributions (AVCs). The AVC provider, appointed by the County Council as the administering authority, was Prudential.



Membership up to 31 March 2008

Membership of the LGPS was available to all contracted employees of participating employers whether whole time, part time or casual.

National legislation and regulation covered the LGPS including the benefit entitlements of Scheme participants and their families. Such benefits were not linked to the investment performance of the Fund. Key features of the contributions payable and the benefits of this tranche are outlined below:

Contributions

Employees contributed 6% of their pensionable pay towards their pension, the exception being manual workers who were Fund members before 1 April 1998 who paid 5%.

Benefits

The normal retirement age for Scheme members was 65 but employees in the Scheme prior to 1 April 1998 could retire at 60* provided they had 25 years' service. Retirement before these ages, other than on ill-health grounds, was not possible without the permission of the employer (*superseded by LGPS (Amendment) Regulations 2018, with effect from 14 May 2018, to enable deferred members to take their pension from age 55 (with reductions) without employer consent).

Annual Pensions

Pensions were calculated at a rate of 1/80 of the employee's average 'final' pay in their last twelve months of employment for each year of pensionable service. Pensions for persons aged 55 and over were linked to the movement in inflation.

Lump Sum Payments

A member received a tax free lump sum payment in retirement of three times their pension, with an option to take a bigger lump sum by exchanging part of their pension. Up to 25% of the capital value of a member's pension could be taken as tax free cash.

Ill Health Retirement

Benefits were as for normal retirement but with additional years added dependent on the length of pensionable membership.

Death-benefits

Death in service attracted a lump sum grant equivalent to up to twice final pensionable pay. An annual pension was payable to the surviving spouse and any eligible children. For death after retirement a single payment was made of five times the member's annual pension (less any pension paid since retirement). The surviving spouse was entitled to an annual pension of up to 50% of the member's pension for the rest of their life.

Supplementary Pensions

Scheme members could purchase additional membership within the Scheme up to a maximum of 6 2/3rd years. As an alternative, Scheme members could increase their benefits by paying Additional Voluntary Contributions, up to limits prescribed in scheme rules, to an AVC provider appointed by the County Council as the administering authority. The Lincolnshire AVC provider was Prudential plc.

The principal points of contact in respect of questions about the LGPS are:

Pensions Administration	West Yorkshire Pension Fund WYPF, PO Box 67, Bradford, BD1 1UP Tel: 01274 434999 Email: pensions@wypf.org.uk
Pension Fund and Investments	Jo Ray, Head of Pensions Lincolnshire County Council, County Offices, Newland, Lincoln, LN1 1YL Tel: 01522 553656 Email : jo.ray@lincolnshire.gov.uk



Pension Fund Knowledge and Skills Policy and Report

As an administering authority of the Local Government Pension Scheme, Lincolnshire County Council recognises the importance of ensuring all staff and individuals charged with the financial management and decision making with regard to the Pension Fund, are fully equipped with the knowledge and skills to discharge the duties and responsibilities allocated to them. Within the management of the Pension Fund, LCC seeks to appoint individuals who are both capable and experienced, and will provide and arrange training for staff and individuals involved to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills.

An annual training plan is agreed by the Pensions Committee each year, setting out what training will be covered over the coming year and linking it back to the CIPFA Knowledge and Skills Framework. Knowledge and skills are acquired and maintained through the regular Pensions Committees, as well as through additional training sessions targeting specific areas, and attendance at seminars and conferences. In addition, all members are offered the opportunity to attend the three-day fundamentals training arranged by the Local Government Association (or an equivalent course) and all new members are offered a one-to-one training session with the Head of Pensions.

The Executive Director - Resources is the delegated officer responsible for ensuring that policies and strategies are implemented.

Activity in 2019/20

A full training plan was taken to Pensions Committee in July 2019 to identify training requirements over the coming year. The training plan was linked to specific areas within the CIPFA Knowledge and Skills Framework.

The 6 areas within the Knowledge and Skills Framework are:

1. Pensions Legislative and Governance Context
2. Pensions Auditing and Accounting Standards
3. Financial Services Procurement and Relationship Management
4. Investment Performance and Risk Management
5. Financial Markets and Products Knowledge
6. Actuarial Methods, Standards and Practices

The table below details the various areas covered in training and Committee presentations during the year, and the areas within the Knowledge and Skills Framework that they relate to.

Date	Subject matter	KSF area(s)
13 June 2019		
Reports	External Manager Presentations	4,5
18 July 2019		
Reports	Independent Advisor Market Update	4,5
	Pension Board Report	1
	Fund Update	1,3,4
	Pensions Administration Report	1
	Employer Monthly Submissions Report	1
	Investment Management Report	4,5
	Annual Property and Infrastructure Report	1,4
	Risk Register Annual Review	1
	Internal Audit Report	2
	Annual Training Plan and Policy	1,4,5
	Draft Annual Report and Accounts	1,2
	2019 Valuation Assumptions	1,6
3 September 2019		
Training	Investment and Responsible Investment Beliefs	1,4,5
3 October 2019		
Reports	Independent Advisor Market Update	4,5
	Pension Board Report	1
	Fund Update	1,3,4
	Pensions Administration Report	1
	Employer Monthly Submissions Report	1
	Investment Management Report	4,5
	Performance Measurement Annual Report	4
	Pension Fund External Audit Report	2
	Investment Beliefs Report	1,4,5
	2019 Valuation Update	1,6
	Draft Funding Strategy Statement	1,6
10/11 October 2019		
Training	Border to Coast Annual Conference	1,3,4,5
12 December 2019		
Reports	External Manager Presentation	4,5

Date	Subject matter	KSF area(s)
9 January 2020		
Reports	Independent Advisor Market Update	4,5
	Pension Board Report	1
	Fund Update	1,3,4
	Pensions Administration Report	1
	Employer Monthly Submissions Report	1
	Investment Management Report	4,5
	Border to Coast RI and Corporate Governance Voting Policies	1,4
	Manager Presentation	4,5
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Training	Investments – UK Equity and Property	4,5
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Reports	Independent Advisor Market Update	4,5
	Pension Board Report	1
	Fund Update	1,3,4
	Pensions Administration Report	1
	Employer Monthly Submissions Report	1
	Investment Management Report	4,5
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As the officer responsible for ensuring that the training policies and strategies are implemented, the Executive Director - Resources can confirm that the officers and individuals charged with the financial management of and the decision making for the Pension Fund collectively possess the requisite knowledge and skills necessary to discharge those duties and decisions required during the reporting period.

Committee Meeting Attendance 2019/20

The table below shows attendance of each of the eleven members at each Committee meeting and training meeting held over the year:

	June 19	July 19	Sep 19	Oct 19	Dec 19	Jan 20	Feb 20	Mar 20*
Cllr E W Strenziel (Chairman)	✓	✓	✓	✓	✓	✓	✓	
Cllr P E Coupland (Vice Chairman)		✓	✓	✓	✓	✓	✓	
Cllr B Adams	✓	✓	✓	✓	✓	✓	✓	
Cllr R D Butroid	✓	✓			✓	✓		✓
Cllr P Key	✓	✓	✓		✓			
Cllr C Perraton-Williams	✓	✓		✓	✓	✓		✓
Cllr S Rawlins	✓				✓			✓
Cllr Dr M E Thompson	✓	✓		✓	✓	✓	✓	
Cllr J Summers (to Oct '19)		✓	✓		n/a	n/a	n/a	n/a
Cllr R Waller (from Oct '19)	n/a	n/a	n/a	n/a	✓	✓	✓	
J Grant (to Jul '19)				n/a	n/a	n/a	n/a	n/a
S Larter (from Oct '19)	n/a	n/a	n/a	✓	✓		✓	✓
A Antcliff	✓	✓	✓	✓	✓	✓	✓	
Total Attendance	8	9	6	7	11	8	7	4

*March 2020 Committee was held with limited attendance due to the corona virus pandemic.

All members of the Pensions Committee have full voting rights.

Lincolnshire Pension Fund 2019/20

Pension Fund Account – For the Year Ended 31 March 2020

	See note	2018/19 £000	2019/20 £000
Contributions and Benefits			
Contributions Receivable	6	(98,278)	(104,258)
Transfers In from other Pension Funds	7	(7,312)	(10,629)
		(105,590)	(114,887)
Benefits Payable	8	92,904	99,326
Payments To and On Account of Leavers	9	7,803	9,920
		100,707	109,246
Net (additions)/withdrawals from dealings with Fund Members		(4,883)	(5,641)
Management Expenses	10	11,018	12,033
Net (additions)/withdrawals including Management Expenses		6,135	6,392
Returns on Investments			
Investment Income	11	(20,403)	(23,692)
Change in Value of Investments	12a	(178,619)	133,375
(Profit)/Loss on Forward Foreign Exchange	13	21,050	18,145
Net Returns on Investments		(177,972)	127,828
Net (Increase)/Decrease in the Net Assets Available for Benefits During the Year		(171,837)	134,220
Opening Net Assets of the Fund		(2,189,357)	(2,361,194)
Closing Net Assets of the Fund		(2,361,194)	(2,226,974)

Net Asset Statement as at 31 March 2020

	See note	2018/19 £000	2019/20 £000
Long Term Investments	12	833	833
Total Long Term Investments		833	833
Investment Assets	12	2,344,965	2,209,739
Investment Liabilities	12	(1,277)	(145)
Total Net Current Investments		2,343,688	2,209,593
Total Net Investments		2,344,521	2,210,426
Current Assets	20	19,802	20,418
Current Liabilities	21	(3,129)	(3,870)
Net Assets of the Fund Available to Fund Benefits at the end of the Reporting Period		2,361,194	2,226,974

Note: The Fund's financial statements do not take account of liabilities to pay pensions and other benefits after the period end. The actuarial present value of promised retirement benefits is disclosed at Note 18.



Notes to the Pension Fund Account

Note 1. Description of the Pension Fund

The Lincolnshire Pension Fund (the Fund) is part of the Local Government Pension Scheme and Lincolnshire County Council is the Administering Authority. Benefits are administered by West Yorkshire Pension Fund (WYPF) in a shared service arrangement.

General

The scheme is governed by the Public Service Pensions Act 2013. The Fund is administered in accordance with the following secondary legislation:

- the LGPS Regulations 2013 (as amended)
- the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended)
- the LGPS (Management and Investment of Funds) Regulations 2016

It is a contributory defined benefit pension scheme to provide pensions and other benefits for pensionable employees of Lincolnshire County Council, the district councils in Lincolnshire and a range of other scheduled and admitted bodies within the county. Teachers, police officers and firefighters are not included as they come within other national pension schemes.

The Fund is overseen by the Lincolnshire County Council Pensions Committee and Local Pension Board.

Membership

Membership of the LGPS is automatic for eligible employees, but they are free to choose whether to remain in the scheme or make their own personal arrangements outside of the scheme.

Organisations participating in the Fund include:

- Scheduled bodies, which are local authorities and similar bodies whose staff are automatically entitled to be members of the Fund; and
- Admitted bodies, which are other organisations that participate in the Fund under an admission agreement between the Fund and the relevant employer. Admitted bodies include charitable organisations and similar not-for-profit bodies or private contractors undertaking a local authority function following outsourcing to the private sector.

There are 251 contributing employer organisations in the Fund including the County Council and just over 73,500 members, as detailed below (information reported based on March processed data):

	31 March 2019	31 March 2020
Number of Employers with Active Members	234	251
Number of Employees in the Fund		
Lincolnshire County Council	9,879	9,175
Other Employers	12,941	13,715
Total Active Members	22,820	22,890
Number of Pensioners		
Lincolnshire County Council	14,398	15,444
Other Employers	7,317	7,994
Total Pensioner Members	21,715	23,438
Number of Deferred Pensioners		
Lincolnshire County Council	19,753	18,668
Other Employers	8,468	8,533
Total Deferred Pensioners	28,221	27,201

Funding

Benefits are funded by contributions and investment earnings. Contributions are made by active members of the Fund in accordance with LGPS Regulations 2013 and range from 5.5% to 12.5% of pensionable pay. Employer contributions are set based on triennial actuarial funding valuations. Rates paid by employers during 2019/20 were determined at the 2016 Valuation, or when a new employer joins the scheme. Rates paid during 2019/20 ranged from 14.9% to 33.0% of pensionable pay. In addition, the majority of employers are paying secondary deficit contributions as cash payments.

Benefits

From 1 April 2014, the scheme became a career average scheme, whereby members accrue benefits based on their pensionable pay in that year at an accrual rate of 1/49th. Accrued pension is up-rated annually in line with the Consumer Price Index.

Prior to 1 April 2014, pension benefits under the LGPS were based on final pensionable pay and length of pensionable service, summarised below:

	Service pre April 2008	Service post April 2008
Pension	Each year is worth 1/80 x final pensionable salary	Each year is worth 1/60 x final pensionable salary
Lump Sum	Automatic lump sum of 3/80 x salary In addition, part of the annual pension can be exchanged for a one-off tax free cash payment. A lump sum of £12 is paid for each £1 of pension given up.	No automatic lump sum. Part of the annual pension can be exchanged for a one-off tax free cash payment. A lump sum of £12 is paid for each £1 of pension given up.



There are a range of other benefits provided under the scheme including early retirement, ill-health pensions and death benefits. For more details, please refer to the shared pensions website at www.wypf.org.uk.

Note 2. Basis of Preparation

The Statement of Accounts summarises the Fund's transactions for the 2019/20 financial year and its position at year end as at 31 March 2020.

The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2019/20, which is based on International Financial Reporting Standards (IFRS), as amended for the UK public sector.

The accounts summarise the transactions of the Fund and report on the net assets available to pay pension benefits due. The accounts do not take into account liabilities to pay pensions and other benefits after the end of the financial year, nor do they take into account the actuarial present value of promised retirement benefits. These liabilities are dealt with through the periodic actuarial valuations of the Fund and are reflected in the levels of employers' contributions determined by these valuations. The Pension Fund has opted to disclose this information in note 18.

The accounts have been prepared on a going concern basis.

The accounting policies set out below (at Note 3) have been applied consistently to all periods presented within these financial statements.

Accounting standards that have been issued but have not yet been adopted

On an annual basis the Code of Practice requires the Pension Fund to consider the impact of accounting standards that have been issued but have not yet been adopted and disclose information relating to the impact of these standards. For 2020/21 there are a number of new accounting standards:

- Amendments to IAS 28 Investments in Associates and Joint Ventures: Long-term Interests in Associates and Joint Ventures;
- Annual Improvements to IFRS Standards 2015-2017 Cycle; and
- Amendments to IAS 19 Employee Benefits: Plan Amendments, Curtailment or Settlement

It is not thought that any of these standards will have a significant impact on the Pension Fund Accounts for 2020/21



Note 3. Significant Accounting Policies

Fund account - revenue recognition

a) Contributions income

Normal contributions are accounted for on an accruals basis as follows:

- Employee contribution rates are set in accordance with LGPS regulations using common percentage rates for all Funds which rise according to pensionable pay; and
- Employer contributions are set at the percentage rate recommended by the fund actuary for the period to which they relate.

Employer deficit funding contributions are accounted for on the day on which they are payable under the schedule of contributions set by the Fund actuary or on receipt if earlier than due date.

Additional employers' contributions, for example in respect of early retirements, are accounted for in the year the event arose.

Any amount due in year but unpaid will be classed as a current financial asset.

b) Transfers to and from other schemes

Transfer values represent the amounts received and paid during the year for members who have either joined or left the Fund and are calculated in accordance with the LGPS Regulations 2013. Transfers in/out are accounted for when received/paid, which is normally when the member liability is accepted or discharged.

c) Investment Income

i) Interest income

Interest income is recognised in the Fund account as it accrues, using the effective interest rate of the financial instrument as at the date of acquisition or origination.

ii) Dividend income

Dividend income is recognised on the date the shares are quoted ex-dividend. Any amount not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset.

iii) Distributions from pooled funds

Distributions from pooled funds are recognised at the date of issue. Any amount not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset.

iv) Movement in the net market value of investments

Changes in the net market value of investments (including investment properties) are recognised as income and comprise all realised and unrealised profits/losses during the year.



Fund account - expense items

d) Benefits payable

Pensions and lump sum benefits payable are included in the accounts at the time of payment.

e) Taxation

The Fund is a registered public service scheme under section 1(1) of Schedule 36 of the Finance Act 2004 and as such is exempt from UK income tax on interest received and from capital gains tax on the proceeds of investments sold. Income from overseas investments suffers withholding tax in the country of origin, unless exemption is permitted. Irrecoverable tax is accounted for as a Fund expense as it arises.

f) Management expenses

The fund discloses its pension fund management expenses in accordance with the CIPFA guidance: Accounting for Local Government Pension Scheme Management Expenses (2016), using the headings shown below. All items of expenditure are charged to the fund on an accruals basis.

i) Administrative expenses

All staff costs of the pensions administration team are charged to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund.

ii) Oversight and Governance

All staff costs associated with the governance and oversight are charged directly to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund.

iii) Investment management expenses

Investment management expenses are charged directly to the fund as part of management expenses and are not included in, or netted off from, the reported return on investments.

Fees for the external investment managers and custodian are agreed in the respective mandates governing their appointments. Broadly, these are based on the market value of the investments under their management and therefore increase and decrease as the value of the investments change.

In addition, the Fund has negotiated with Invesco Asset Management (for Global Equities – ex UK) and Morgan Stanley Investment Management Ltd. (for Alternative Investments) that an element of their fee will be performance related.

Where an investment manager's fee invoice has not been received by the financial year end, an estimate based upon the market value of their mandate is used for inclusion in the Fund accounts.

Fees on investments where the cost is deducted at source have been included within investment expenses and an adjustment made to the change in market value of investments.

Net assets statement

g) Financial assets

All investment assets are included in the net assets statement on a fair value basis as at the reporting date. A financial asset is recognised in the net asset statement on the date the Fund becomes party to the contractual acquisition of the asset. From this date, any gains or losses arising from changes in the fair value of the asset are recognised by the Fund and are classified as FVPL.

The values of investments as shown in the net assets statement have been determined at fair value in accordance with the requirements of the Code and IFRS13 (see Note 14). For the purposes of disclosing levels of fair value hierarchy, the Fund has adopted the classification guidelines recommended in *Practical Guidance on Investment Disclosures* (PRAG/Investment Association, 2016).

Private equity, property and infrastructure valuations are based on valuations provided by managers at the year-end date. If valuations at the yearend are not produced by the manager, the latest available valuation is adjusted for cash flows in the intervening period.

The investment in the LGPS asset pool, Border to Coast Pensions Partnership, is also carried at fair value. This has been classified as FVOCI rather than FVPL as the investment is a strategic investment and not held for trading.

h) Foreign currency transactions

Dividend, interest, purchases and sales of investments in foreign currencies have been accounted for at the spot rates at the date of the transaction. End of year spot market exchange rates are used to value cash balances held in foreign currency bank accounts, market values of overseas investments and purchases and sales outstanding at the end of the reporting period. The exchange rates used at 31 March 2020 are shown in Note 28.

i) Derivatives

The Fund uses derivative financial instruments to manage its exposure to certain risks arising from its investment activities. The Fund does not hold derivatives for speculative purposes.

j) Cash and cash equivalents

Cash comprises of cash in hand, deposits and includes amounts held by external managers. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and are subject to minimum risk of changes in value.



k) Financial liabilities

A financial liability is recognised in the net assets statement on the date the fund becomes party to the liability. The fund recognises financial liabilities relating to investment trading at fair value as at the reporting date, and any gains or losses arising from changes in the fair value of the liability between contract date, the year-end date and the eventual settlement date are recognised in the fund account as part of the Change in Value of Investments.

Other financial liabilities classed as amortised cost are carried at amortised cost i.e. the amount carried in the net asset statement is the outstanding principal repayable plus accrued interest.

l) Actuarial present value of promised retirement benefits

The actuarial present value of promised retirement benefits is assessed on a triennial basis by the scheme actuary in accordance with the requirements of IAS 19 and relevant actuarial standards.

As permitted under the Code, the Fund has opted to disclose the actuarial present value of promised retirement benefits by way of a note to the net assets statement (Note 18).

m) Additional voluntary contributions

The Fund provides an additional voluntary contribution (AVC) scheme for its members, the assets of which are invested separately from those of the Pension Fund. The Fund has appointed Prudential as its AVC provider. AVCs are paid to the AVC provider by employers and are specifically for providing additional benefits for individual contributors. Each AVC contributor receives an annual statement showing the amount held in their account and the movements in the year.

AVCs are not included in the accounts in accordance with Regulation 4(1)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 but are disclosed as a note only (Note 22).

n) Contingent assets and contingent liabilities

A contingent asset arises where an event has taken place giving rise to a possible asset whose existence will only be confirmed or otherwise by the occurrence of future events.

A contingent liability arises where an event has taken place prior to the year-end giving rise to a possible financial obligation whose existence will only be confirmed or otherwise by the occurrence of future events. Contingent liabilities can also arise in circumstances where a provision would be made, except that it is not possible at the balance sheet date to measure the value of the financial obligation reliably.

Contingent assets and liabilities are not recognised in the net assets statement but are disclosed by way of narrative in the notes (see Note 25 and 26).



Note 4. Critical Judgements in Applying Accounting Policies

Pension Fund liability

The net Pension Fund liability is recalculated every three years by the appointed actuary, with annual updates in the intervening years. The methodology used is in line with accepted guidelines.

This estimate is subject to significant variances based on changes to the underlying assumptions which are agreed with the actuary and have been summarised in Note 17.

These actuarial revaluations are used to set future contribution rates and underpin the Fund's most significant investment management policies, for example in terms of the balance struck between longer term investment growth and short-term yield/return.

Investment in Border to Coast Pension Partnership

The valuation of the Fund's investment in Border to Coast Pensions Partnership has been assessed using the criteria set out in IFRS9 Financial Instruments. The key factors considered include:

- There is currently no market for these investments and no identical or similar market to compare them to. Therefore it is not possible to use a 'quoted price'.
- Border to Coast Pensions Partnership Ltd is intending to trade at a break even position (no/minimal profit or loss) with any values off-set against Partner Fund future costs. The company have now published a set of full year audited accounts and these show the company equity as equal to the 'Called up Share Capital' i.e. Class B Regulated Capital of £10m (shared equally between the twelve partner fund).

There is insufficient evidence to estimate the fair value at any measure other than cost, therefore fair value is cost.

Covid-19 Impact

The impact of the Covid-19 pandemic has created uncertainty surrounding illiquid asset values. As such some of the Pension Fund's holdings as at 31 March 2020 are difficult to value according to preferred accounting policy.

- Pooled property unit trusts. Covid-19 has caused huge disruption and exceptional circumstances within property markets, as a result of this, the valuations provided by independent valuers for these property funds are subject to a 'material valuation uncertainty' qualification as set out in VPGA 10 of the RICS Valuation – Global Standards. Consequently, less certainty and a higher degree of caution should be attached to these valuations than would normally be the case.
- Unquoted assets (including alternatives and private equity holdings). The fair value of these investments is unavoidably subjective in normal circumstances and Covid-19 disruptions may increase this. The valuations are based on forward-looking estimates and judgements involving

many factors. Unquoted private equity assets are valued by the investment managers in accordance with industry standards.

The Fund accounts are currently prepared using valuation information available at 31 March 2020 provided by investment managers and validated by the Fund's Custodian. These valuations are mainly based on audited accounts from earlier periods (e.g. 31 December 2019) rolled forward for cashflows, as is allowable by the Code. Due to the coronavirus pandemic the 31 March actual valuations may be materially different to the rolled forward valuations currently reported in the accounts. When these valuations are received the Fund will consider their materiality both individually and collectively and revise the accounts to reflect these valuations if necessary.

Note 5. Assumptions Made About the Future and Major Sources of Estimation Uncertainty

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities at the balance sheet date and the amounts reported for the revenues and expenses during the year. Estimates and assumptions are made taking into account historical experience, current trends and other relevant factors. However, the nature of estimation means that the actual outcomes could differ from the assumptions and estimates.

The items in the accounts for the year ended 31 March 2020 for which there is a significant risk of material adjustment in the forthcoming financial year are as follows:

Item	Uncertainties	Effect if actual results differ from assumptions
Actual present value of promised retirement benefits (Note 18)	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on investments. A firm of consulting actuaries are engaged to provide expert advice about the assumptions to be applied.	The effects of changes in the individual assumptions can be measured. For example: <ol style="list-style-type: none"> 1) a 0.5% increase in the discount rate assumption would result in a decrease of the pension liability of £359m. 2) a 0.25% increase in assumed earnings inflation would increase the value of liabilities by approximately £28m. 3) a 0.5% increase in the pension increase rate would increase the value of liabilities by approximately £320m. 4) a one-year increase in assumed life expectancy would increase the liability by approximately £151m.

Item	Uncertainties	Effect if actual results differ from assumptions
Unquoted Assets (including Alternatives and Private Equity) (Note 14)	<p>Private Equity investments are valued at fair value in accordance with British Venture Capital Association guidelines (2012). These investments are not publicly listed and as such there is a degree of estimation involved in the valuation.</p> <p>Private Equity valuations within the Pension Fund accounts are all based on the reported information held by the Council on 31 March each year.</p>	The total private equity investments in the Fund are £23m. There is a risk that these may be over or understated in the accounts by £5.5m.
Pooled Property Unit Trusts	<p>Covid-19 has caused huge disruption and exceptional circumstances within property markets, as a result of this, the valuations provided by independent valuers for these property funds are subject to a 'material valuation uncertainty' qualification as set out in VPGA 10 of the RICS Valuation – Global Standards.</p> <p>Consequently, less certainty and a higher degree of caution should be attached to these valuations than would normally be the case.</p>	The total pooled property unit trusts invested in by the Fund are valued at £175.602m. If these assets were over or under-stated in the accounts by 1% this would affect the value by £1.6m.

Note 6. Contributions Receivable

Contributions receivable are analysed below:

	2018-19 £000	2019-20 £000
Employers		
Normal	58,966	60,186
Deficit Recovery Funding	17,138	21,412
Additional – Augmentation	1,632	892
Members		
Normal	20,466	21,684
Additional Years	76	84
Total Contributions Receivable	98,278	104,258

These contributions are analysed by type of Member Body as follows:

	2018-19 £000	2019-20 £000
Lincolnshire County Council	40,061	43,539
Scheduled Bodies	53,239	56,339
Admission Bodies	4,978	4,380
Total Contributions Receivable	98,278	104,258

Note 7. Transfers In From Other Pension Funds

	2018-19 £000	2019-20 £000
Individual Transfers from Other Schemes	7,312	10,629
Group Transfers from Other Schemes	-	-
Total Transfers In from Other Pension Funds	7,312	10,629

There were no material outstanding transfers due to the Pension Fund as at 31 March 2020.

Note 8. Benefits Payable

	2018-19 £000	2019-20 £000
Pensions	73,016	78,073
Commutations and Lump Sum Retirement Benefits	17,791	18,870
Lump Sum Death Benefits	2,097	2,383
Total Benefits Payable	92,904	99,326

These benefits are analysed by type of Member Body as follows:

	2018-19 £000	2019-20 £000
Lincolnshire County Council	49,350	52,290
Scheduled Bodies	39,423	42,340
Admission Bodies	4,131	4,696
Total Benefits Payable	92,904	99,326

Note 9. Payments To and On Account of Leavers

	2018-19 £000	2019-20 £000
Individual Transfers to Other Schemes	6,990	9,580
Group Transfers from Other Schemes	419	-
Refunds to Members Leaving Service	394	340
Total Payments To and On Account of Leavers	7,803	9,920

There were no material outstanding transfers due from the Pension Fund as at 31 March 2020.

Note 10. Management Expenses

	2018-19 £000	2019-20 £000
Administrative Costs	1,128	1,250
Investment Management Expenses	9,429	10,203
Oversight and Governance Costs	461	580
Total Management Expenses	11,018	12,033

The External Audit fee for the year was £0.019m (£0.019m in 2018/19).

A further breakdown of the investment management expenses is shown below:

	2018-19 £000	2019-20 £000
Transaction Costs	738	1,583
Management Fees	7,999	6,804
Performance Related Fees	609	1,641
Custody Fees	83	175
Total Investment Management Expenses	9,429	10,203

Note 11. Investment Income

	2018-19 £000	2019-20 £000
Equities	18,192	19,323
Pooled Investments		
Property	1,629	2,563
Infrastructure	18	-
Alternatives	3	1,535
Cash Deposits	97	192
Stock Lending	464	79
Total Investment Income	20,403	23,692

Note 12. Investments

	2018-19 £000	2019-20 £000
Long Term Investments		
Unquoted Equity Holding in Border to Coast Pensions Partnership	833	833
Total Long Term Investment	833	833
	2018-19 £000	2019-20 £000
Investment Assets		
Equities	818,260	495,761
Pooled Investments		
Property	194,973	190,977
Infrastructure	44,437	47,736
Private Equity	22,962	18,026
Bonds	283,158	414,941
Equities	649,490	695,082
Alternatives	290,056	311,218
Cash Deposits	36,413	23,939
Investment Income Due	5,216	3,723
Amounts Receivable from Sales	-	-
Open Forward Foreign Exchange (FX)	-	8,335
Total Investment Assets	2,344,965	2,209,738
Investment Liabilities		
Open Forward Foreign Exchange (FX)	(1,276)	-
Investment Income Payable	(1)	(18)
Amounts Payable for Purchases	-	(127)
Total Investment Liabilities	(1,277)	(145)
Total Net Investment Assets	2,343,688	2,209,593

Note 12A. Reconciliation of Movements in Investments

2019/20	Market Value 31 March 2019	Purchases and derivative payments	Sales and derivative receipts	Change in market value during the year	Market Value 31 March 2020
	£000	£000	£000	£000	£000
Equities	818,260	380,719	(784,022)	80,804	495,761
Pooled Investments					
Property	194,973	1,124	(3,441)	(1,679)	190,977
Infrastructure	44,437	2,848	(3,346)	3,797	47,736
Private Equity	22,962	356	(7,469)	2,177	18,026
Bonds	283,158	331,502	(197,591)	(2,128)	414,941
Equities	649,490	429,663	(138,595)	(245,476)	695,082
Alternatives	290,056	103,443	(111,411)	29,130	311,218
	2,303,336	1,249,655	(1,245,875)	(133,375)	2,173,741
Cash Deposits	36,413				23,939
Other Investment Balances:					
Open Forward FX	(1,276)				8,335
Amounts Receivable for Sales	-				-
Investment Income Due	5,215				3,705
Amounts Payable for Purchases	-				(127)
Net investment assets	2,343,688				2,209,593

2018/19	Market Value 31 March 2018	Purchases and derivative payments	Sales and derivative receipts	Change in market value during the year	Market Value 31 March 2019
	£000	£000	£000	£000	£000
Equities	751,286	350,985	(335,249)	51,238	818,260
Pooled Investments					
Property	194,461	42	(4,989)	5,459	194,973
Infrastructure	35,420	6,835	(3,294)	5,476	44,437
Private Equity	29,345	423	(13,271)	6,465	22,962
Bonds	264,097	12,317	(2,317)	9,061	283,158
Equities	582,508	-	(1,832)	68,814	649,490
Alternatives	268,167	78,966	(89,183)	32,106	290,056
	2,125,284	449,568	(450,135)	178,619	2,303,336
Cash Deposits	38,746				36,413
Other Investment Balances:					
Open Forward FX	50				(1,276)
Amounts Receivable for Sales	1,409				-
Investment Income Due	4,410				5,215
Amounts Payable for Purchases	(2,016)				-
Net investment assets	2,167,883				2,343,688

Note 12B. Analysis of Investments

2019/20	UK £000	Overseas £000	Total £000
Quoted			
Equities	0	495,761	495,761
<u>Pooled Investments</u>			
Property – UK Commercial Unit Trust	175,602	-	175,602
Bonds	414,941	-	414,941
Equities	695,082	-	695,082
Quoted as at 31 March 2020	1,285,362	495,761	1,781,386
Unquoted			
<u>Pooled Investments</u>			
Property	796	14,579	15,375
Infrastructure	43,283	4,453	47,736
Private Equity	-	18,026	18,026
Alternatives	311,218	-	311,218
Unquoted as at 31 March 2020	355,297	37,058	392,355
Cash and Equivalents			23,939
Other Investment Balances - Assets			12,058
Other Investment Balances - Liabilities			(145)
Total as at 31 March 2020			2,209,593

2018/19	UK £000	Overseas £000	Total £000
Quoted			
Equities	15,462	802,798	818,260
<u>Pooled Investments</u>			
Property – UK Commercial Unit Trust	178,634	-	178,634
Bonds	283,158	-	283,158
Equities	649,490	-	649,490
Quoted as at 31 March 2019	1,126,744	802,798	1,929,542
Unquoted			
<u>Pooled Investments</u>			
Property	1,547	14,792	16,339
Infrastructure	40,458	3,979	44,437
Private Equity	-	22,962	22,962
Alternatives	290,056	-	290,056
Unquoted as at 31 March 2019	332,061	41,733	373,794
Cash and Equivalents			36,413
Other Investment Balances - Assets			5,216
Other Investment Balances - Liabilities			(1,277)
Total as at 31 March 2019			2,343,688

Note 12C. Investments Analysed by Fund Manager

Fund Manager	31 March 2019		31 March 2020	
	£'000	%	£'000	%
Externally Managed				
Border to Coast (Global Equity Alpha)	-	-	344,976	15.5
Border to Coast (Investment Grade Credit)	-	-	180,327	8.2
Invesco	545,516	23.2	503,027	22.8
Schroders	136,451	5.8	-	-
Columbia Threadneedle	149,422	6.4	-	-
Morgan Stanley (Global Brands)	219,728	9.4	-	-
Morgan Stanley (Alternatives)	303,948	13.0	323,374	14.6
Morgan Stanley (Private Equity)	24,679	1.1	19,223	0.9
Blackrock	283,157	12.1	234,613	10.6
Legal & General	429,762	18.3	350,106	15.8
Internally Managed				
Property	202,956	8.7	199,975	9.1
Infrastructure	44,686	1.9	49,776	2.3
UK Equity	344	-	1	-
Unallocated Cash	3,039	0.1	4,195	0.2
Total	2,343,688	100.0	2,209,593	100.0

It is required to disclose where there is a concentration of investment (other than in UK Government Securities) which exceeds 5% of the total value of the net assets of the scheme. The investments that fall into this category are as follows:

Investment	31 March 2019		31 March 2020	
	£000	%	£000	%
Legal & General UK Equity Fund	429,762	18.2	350,106	15.7
Border to Coast (Global Equity Alpha)	-	-	344,976	15.5
Morgan Stanley Alternative Investments	290,056	12.3	311,218	14.0
Morgan Stanley Global Brands	219,728	9.3	-	-
Border to Coast (Investment Grade Credit)	-	-	180,327	8.1
Blackrock 1-5yr Corporate Bond Fund	139,253	5.9	149,016	6.7

Note 12D. Stock Lending

The Fund lends stock to third parties under a stock lending agreement with the Fund's custodian, Northern Trust. The total amount of stock on loan at the year-end was £18.934m (£0.001m at 31 March 2019) and this value is included in the net assets statement to reflect the Fund's continuing economic interest in the securities on loan. As security for the stocks on loan, the Fund was in receipt of collateral at the year-end valued at £20.722m (£0.001m at 31 March 2019), which represented 109.4% of the value of securities on loan.

Stock-lending commissions are remitted to the Fund via the custodian. During the period the stock is on loan, the voting rights of the loaned stock pass to the borrower. Income received from stock lending activities, before costs, was £0.079m for the year ending 31 March 2020 (£0.464m at 31

March 2019) and is included within the 'Investment Income' figure detailed on the Pension Fund Account. There are no liabilities associated with the loaned assets.

Note 13. Analysis of Derivatives

The holding in derivatives is used to hedge exposures to reduce risk in the fund. The use of any derivatives is managed in line with the investment management agreements in place between the Fund and the various investment managers.

The only direct derivative exposure that the Fund has is in forward foreign currency contracts. In order to maintain appropriate diversification and to take advantage of overseas investment returns, a significant proportion of the Fund's quoted equity portfolio is in overseas stock markets.

Open forward Currency Contracts

Settlement	Currency Bought	Local Value 000	Currency Sold	Local Value 000	Asset Value £000	Liability Value £000	
Up to one month	None						
Over one month	GBP	291,727	USD	351,292	8,798	-	
	GBP	7,828	CAD	13,365	260	-	
	GBP	955	AUD	1,925	6	-	
	GBP	17,026	EUR	18,605	536	-	
	EUR	5,230	GBP	4,831	-	(196)	
	USD	18,941	GBP	16,323	-	(1,068)	
Total					9,600	(1,264)	
Net Forward Currency Contracts at 31 March 2019						8,336	
Prior Year Comparative							
						6	(1,282)
Net Forward Currency Contracts at 31 March 2018						(1,276)	

Profit (Loss) of Forward Currency Deals and Currency Exchange

The profit or loss from any forward deals and from currency exchange is a result of normal trading of the Fund's managers who manage multi-currency portfolios. For 2019/20 this was a loss of £18.145m (£21.050m loss in 2018/19).

Note 14. Fair Value – Basis of Valuation

All investment assets are held at fair value in accordance with the requirements of the Code and IFRS13. The basis of the valuation of each class of investment asset is set out below. There has been no change in the valuation techniques used during the year. All assets have been valued using fair value techniques based on the characteristics of each instrument, with the overall objective of maximising the use of market-based information.

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Market quoted investments	Level 1	Published bid market price ruling on the final day of the accounting period	Not required	Not required
Exchange traded pooled investments	Level 1	Closing bid value on published exchanges	Not required	Not required
Forward foreign exchange derivatives	Level 2	Market forward exchange rates at the year-end	Exchange rate risk	Not required
Pooled investments	Level 2	Closing bid price where bid and offer prices are published Closing single price where single price published	NAV-based pricing set on a forward pricing basis	Not required
Unquoted Equities and Alternatives	Level 3	Comparable valuation of similar companies in accordance with <i>International Private Equity and Venture Capital Valuation Guidelines (2012)</i>	EBITDA multiple Revenue multiple Discount for lack of marketability Control premium	Valuations could be affected by post balance sheet events, changes to expected cashflows, or by any differences between audited and unaudited accounts

Sensitivity of assets valued at level 3

Having analysed historical data and current market trends, and consulted with independent investment advisors and investment managers, the Fund has determined that the valuation methods described above are likely to be accurate to within the following ranges, and has set out below the consequent potential impact on the closing value of investments held at 31 March 2020.

	Assessed valuation range (+/-)	Value at 31 March 2020 £000	Value on increase £000	Value on decrease £000
Private Equity	24%	18,026	22,352	13,700
Alternatives	10%	311,218	342,340	280,096

All movements in the assessed valuation range derive from changes in the underlying profitability of component companies, the range in the potential movement of +/-24% for Private Equity and +/-10% for Alternatives is caused by how this profitability is measured since different methods (listed in the first table of Note 14 above) produce different price results.

Note 14A. Fair Value Hierarchy

Asset and liability valuations have been classified into three levels, according to the quality and reliability of information used to determine fair values. Transfers between levels are recognised in the year in which they occur.

Level 1

Assets and liabilities at level 1 are those where the fair values are derived from unadjusted quoted prices in active markets for identical assets or liabilities. Products classified as level 1 comprise quoted equities, quoted fixed securities, quoted index linked securities and unit trusts.

Level 2

Assets and liabilities at level 2 are those where quoted market prices are not available; for example, where an instrument is traded in a market that is not considered to be active, or where valuation techniques are used to determine fair value.

Level 3

Assets and liabilities at level 3 are those where at least one input that could have a significant effect on the instrument's valuation is not based on observable market data.

The following table provides an analysis of the financial assets and liabilities of the Pension Fund grouped into levels 1 to 3, based on the level at which the fair value is observable.

	Quoted market price	Using observable inputs	With significant unobservable inputs	
Values at 31 March 2020	Level 1	Level 2	Level 3	Total
Observable Fair Value	£000	£000	£000	£000
Financial assets at fair value through profit and loss	1,609,168	239,042	337,589	2,185,799
Financial liabilities at fair value through profit and loss	-	(130)	(15)	(145)
Financial assets at fair value through other comprehensive income and expenditure	-	-	833	833
Net Investment Assets	1,609,168	238,912	338,407	2,186,487

	Quoted market price	Using observable inputs	With significant unobservable inputs Level 3	Total
Values at 31 March 2019	Level 1	Level 2		
Observable Fair Value	£000	£000	£000	£000
Financial assets at fair value through profit and loss	1,755,869	239,658	313,024	2,308,551
Financial liabilities at fair value through profit and loss	-	-	(1,276)	(1,276)
Net Investment Assets	1,755,869	239,658	311,748	2,307,275

The holding in Border to Coast Pensions Partnership of £0.833m was carried at cost at 31 March 2019.

14B Reconciliation of Fair Value Measurements within Level 3

Period 2019/20								
	Market value at 31 March 2019	Transfers into Level 3	Transfers out of Level 3	Purchases during the year and derivative payments	Sales during the year and derivative receipts	Unrealised gains/(losses)	Realised gains/(losses)	Market value at 31 March 2020
	£000	£000	£000	£000	£000	£000	£000	£000
Private Equity	22,962	-	-	356	(7,469)	(3,909)	6,086	18,026
Alternatives	288,786	-	-	103,443	(111,411)	37,115	1,615	319,548
Investment in Border to Coast Pensions Partnership	833	-	-	-	-	-	-	833
Total	311,748	-	-	103,799	(118,880)	33,206	7,701	337,574

Period 2018/19								
	Market value at 31 March 2018	Transfers into Level 3	Transfers out of Level 3	Purchases during the year and derivative payments	Sales during the year and derivative receipts	Unrealised gains/(losses)	Realised gains/(losses)	Market value at 31 March 2019
	£000	£000	£000	£000	£000	£000	£000	£000
Private Equity	29,345	-	-	423	(13,271)	(5,350)	11,815	22,962
Alternatives	268,167	-	-	78,966	(89,183)	52,093	(21,257)	288,786
Total	311,748	-	-	103,799	(118,880)	33,206	7,701	337,574

Unrealised and realised gains and losses are recognised in the profit and losses on disposal and change in market values line of the Fund account.

Note 15. Financial Instruments

Note 15A. Classification of Financial Instruments

The following table analyses the carrying amounts of financial instruments by category and net assets statement heading. No financial assets were reclassified during the accounting period.

31 March 2020				
	Fair value through profit and loss	Assets at amortised cost	Liabilities at amortised cost	Fair value through comprehensive income
	£000	£000	£000	£000
Financial Assets				
Unquoted Equity Holding in Border to Coast Pensions Partnership	-	-	-	833
Equities	495,761		-	-
Pooled Investments				-
Property	190,977		-	-
Infrastructure	47,736		-	-
Private Equity	18,026		-	-
Bonds	414,941		-	-
Equities	695,082		-	-
Alternatives	311,218		-	-
Cash		37,010	-	-
Other Investment Balances	12,058		-	-
Debtors		7,347	-	-
	2,185,799	44,357	-	833
Financial Liabilities				
Other Investment Balances	(145)	-	-	-
Creditors	-	-	(3,870)	-
	(145)	-	-	-
Grand Total	2,185,654	44,357	-	833

31 March 2019				
	Fair value through profit and loss	Assets at amortised cost	Liabilities at amortised cost	Fair value through comprehensive income
	£000	£000	£000	£000
Financial Assets				
Unquoted Equity Holding in Border to Coast Pensions Partnership				833
Equities	818,260			
Pooled investments				
Property	194,973			
Infrastructure	44,437			
Private Equity	22,962			
Bonds	283,158			
Equities	649,490			
Alternatives	290,056			
Cash		47,123		
Other Investment Balances	5,215			
Debtors		9,092		
	2,308,551	56,215	-	833
Financial Liabilities				
Other Investment Balances	(1,276)			
Creditors			(3,129)	
	(1,276)	-	(3,129)	-
Grand Total	2,307,275	56,215	(3,129)	833

15B Net Gains and Losses on Financial Instruments

	2018/19 £000	2019/20 £000
Financial Assets		
Fair Value through Profit and Loss	178,619	(133,375)
Total	178,619	(133,375)

The authority has not entered into any financial guarantees that are required to be accounted for as financial instruments.



Note 16. Nature and Extent of Risks Arising from Financial Instruments

Risk and Risk Management

The Fund's primary long-term risk is that its assets will fall short of its liabilities (i.e. the promised benefits payable to members). Therefore, the aim of investment risk management is to minimise the risk of an overall reduction in the value of the Fund and to maximise the opportunity for gains across the Fund. This is achieved through asset diversification to reduce exposure to market risk (price risk, currency risk and interest rate risk) and credit risk to an acceptable level. In addition, the Fund manages its liquidity risk to ensure there is sufficient liquidity to meet the Fund's forecast cash flows. The Council manages these investment risks as part of its overall Pension Fund risk management programme.

a) Market Risk

Market risk is the loss from fluctuations in equity and commodity prices, interest and foreign exchange rates and credit spreads. The Fund is exposed to market risk from its investment activities, particularly through its equity holdings. The level of risk exposure depends on market conditions, expectations of future prices and yield movements and the asset mix.

To mitigate market risk, the Pension Fund invests in a diversified pool of assets to ensure a reasonable balance between different categories, having taken advice from the Fund's Investment Consultant. The management of the assets is split between a number of managers with different performance targets and investment strategies. Risks associated with the strategy and investment returns are included as part of the quarterly reporting to the Pensions Committee where they are monitored and reviewed.

Other Price Risk

Price risk represents the risk that the value of a financial instrument will fluctuate as a result of changes in market prices (other than those arising from interest rate risk or foreign exchange risk), whether those changes are caused by factors specific to the individual instrument or its issuer or factors affecting all such instruments in the market.

The Fund is exposed to share and derivative price risk. This arises from investments held by the Fund for which the future price is uncertain. All securities investments present a risk of loss of capital. The maximum risk resulting from financial instruments is determined by the fair value of the financial instrument.

The Fund's investment managers mitigate this price risk through diversification, and the selection of securities and other financial instruments is monitored by the Council to ensure it is within limits specified in the Fund investment strategy.

Other Price Risk - Sensitivity Analysis

Following analysis of historical data and expected investment return during the financial year, the Fund, in consultation with a fund manager, has determined that the following movements in market price are reasonably possible for 2019/20; assuming that all other variables, in particular foreign exchange rates and interest rates remain the same:

Asset Type	Potential Market Movements (+/-)
UK Equities	30.0%
Overseas Equities	33.0%
UK Bonds	16.0%
Property	19.0%
Infrastructure	17.0%
Private Equity	24.0%
Alternatives	10.0%

Had the market price of the Fund's investments increased/decreased in line with the above, the change in net assets available to pay benefits would have been as follows (the prior year comparative is shown below):

Asset Type	Value at 31 March 2020 £000	Percentage Change %	Value on Increase £000	Value on Decrease £000
UK Equities	695,082	30.0%	903,607	486,557
Overseas Equities	495,761	33.0%	659,362	332,160
UK Bonds	414,941	16.0%	481,332	348,550
Property	190,977	19.0%	227,263	154,691
Infrastructure	47,736	17.0%	55,851	39,621
Private Equity	18,026	24.0%	22,352	13,700
Alternatives	311,218	10.0%	342,340	280,096
Total	2,173,741		2,692,107	1,655,375

Asset Type	Value at 31 March 2019 £000	Percentage Change %	Value on Increase £000	Value on Decrease £000
UK Equities	664,952	13%	751,396	578,508
Overseas Equities	802,798	13%	907,162	698,434
UK Bonds	283,158	5%	297,316	269,000
Property	194,973	15%	224,219	165,727
Infrastructure	44,437	17%	51,991	36,883
Private Equity	22,962	24%	28,473	17,451
Alternatives	290,056	10%	319,062	261,050
Total	2,303,336		2,579,619	2,027,053

Interest rate risk

The Fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments are subject to interest rate risk, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes to market interest rates.

The Fund's direct exposure to interest rate movements as at 31 March 2020 and 31 March 2019 is set out below. These disclosures present interest rate risk based on the underlying financial assets at fair values.

Interest rate risk - sensitivity analysis

The Fund recognises that interest rates can vary and can affect both income to the Fund and carrying value of Fund assets, both of which affect the value of the net assets available to pay benefits. The analysis that follows assumes that all other variables, in particular exchange rates, remain constant, and shows the effect in the year on the net assets available to pay benefits of a +/- 1% change in interest rates.

Assets Exposed to Interest Rate Risk	Value at 31 March 2020	Percentage Movement on 1% change in interest Rates	Value on Increase	Value on Decrease
	£000		£000	£000
Cash and cash equivalents	23,939	-	23,939	23,939
Cash balances	13,071	-	13,071	13,071
Bonds	414,941	4,149	419,090	410,792
Total	451,951	4,149	456,100	447,802

Assets Exposed to Interest Rate Risk	Value at 31 March 2019	Percentage Movement on 1% change in interest Rates	Value on Increase	Value on Decrease
	£000		£000	£000
Cash and cash equivalents	36,413	-	36,413	36,413
Cash balances	10,710	-	10,710	10,710
Bonds	283,158	2,832	285,990	280,326
Total	330,281	2,832	333,113	327,449

Income Exposed to Interest Rate Risk	Value at 31 March 2020	Percentage Movement on 1% change in interest Rates	Value on Increase	Value on Decrease
	£000	%	£000	£000
Cash deposits, cash and cash equivalents	192	2	194	190
Bonds	-	-	-	-
Total	192	2	194	190

Income Exposed to Interest Rate Risk	Value at 31 March 2019	Percentage Movement on 1% change in Interest Rates	Value on Increase	Value on Decrease
	£000	%	£000	£000
Cash deposits, cash and cash equivalents	97	1	98	96
Bonds	-	-	-	-
Total	97	-	98	96

This analysis demonstrates that a 1% increase in interest rates will not affect the interest received on fixed interest assets but will reduce their fair value, and vice versa. Changes in interest rates do not impact on the value of cash and cash equivalent balances but they will affect the interest income received on those balances.

Currency risk

Currency risk represents the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The Fund is exposed to currency risk on financial instruments that are denominated in any currency other than sterling. The Fund holds both monetary and non-monetary assets denominated in currencies other than UK sterling.

Following analysis of historical data and in consultation with an investment manager, the Fund considers the likely volatility associated with foreign exchange rate movements to be not more than 10%, as measured by one standard deviation (8% in 2018/19). An 10% strengthening/weakening of the pound against various currencies in which the Fund holds investments would increase/decrease the net asset available to pay benefits as follows:

Assets Exposed to Currency Risk	Value at 31 March 2020	Percentage Market Movement	Value on Increase	Value on Decrease
	£000	£000	£000	£000
Overseas Equities	495,761	49,576	545,337	446,185
Pooled Investments:				
Overseas Property	14,579	1,458	16,037	13,121
Overseas Infrastructure	4,453	445	4,898	4,008
Overseas Private Equity	18,026	1,803	19,829	16,223
Total	532,819	53,282	586,101	479,537

Assets Exposed to Currency Risk	Value at 31 March 2019	Percentage Market Movement	Value on Increase	Value on Decrease
	£000	£000	£000	£000
Overseas Equities	802,798	64,224	867,022	738,574
Pooled Investments:				
Overseas Property	14,792	1,183	15,975	13,609
Overseas Infrastructure	3,979	318	4,297	3,661
Overseas Private Equity	22,962	1,837	24,799	21,125
Total	844,531	67,562	912,093	776,969



b) Credit Risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the fund's financial assets and liabilities.

The Fund is additionally exposed to credit risk through securities lending and its daily treasury activities.

The securities lending programme is run by the Fund's custodian, Northern Trust, who manage and monitor the counterparty risk, collateral risk and the overall lending programme. The minimum level of collateral for securities on loan is 102%, however more collateral may be required depending upon type of transaction. This level is assessed daily to ensure it takes account of market movements. To further mitigate risk, Northern Trust provide an indemnity to cover borrower default, overnight market risks, fails on return of loaned securities and entitlements to securities on loan. Securities lending is capped by investment regulations and statutory limits are in place to ensure that no more than 25% of eligible assets can be on loan at any one time.

The Pension Fund's bank account is held at Barclays, which holds an 'A' long term credit rating (Fitch Credit Rating Agency) and it maintains its status as a well-capitalised and strong financial organisation. The management of the cash held in this account is carried out by the Council's Treasury Manager, in accordance with an agreement signed by the Pensions Committee and the Council. The agreement stipulates that the cash is pooled with the Council's cash and managed in line with the policies and practices followed by the Council, as outlined in the CIPFA Code of Practice for Treasury Management in the Public Services and detailed in its Treasury Management Practices.

c) Liquidity risk

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Council takes steps to ensure that the Fund has adequate cash resources to meet its commitments.

The Fund holds a working cash balance in its own bank account to cover the payment of benefits and other lump sum payments. At an investment level, the Fund holds a large proportion of assets in listed equities - instruments that can be liquidated at short notice, normally three working days. As at 31 March 2020, these assets totalled £1,605.784m (£1,750.908m as at 31 March 2019), with a further £37.010m held in cash (£47.123m as at 31 March 2019). Currently, the Fund is cash flow positive each month (i.e. the contributions received exceed the pensions paid). This position is monitored regularly and reviewed at least every three years alongside the Triennial Valuation.

Note 17. Funding Arrangements

In line with the Local Government Pension Scheme Regulations 2013, the Fund’s actuary undertakes a funding valuation every three years for the purpose of setting employer contribution rates for the forthcoming triennial period. The valuation which applies to the 2019/20 accounts took place as at 31st March 2016. The details set out in the note below relate to the valuation. The next valuation took place on 31st March 2019 and relates to accounting period from 01 April 2020.

The key elements of the funding policy are:

- 1) to ensure the long-term solvency of the fund, i.e. that sufficient funds are available to meet all pension liabilities as they fall due for payment;
- 2) to ensure that employer contribution rates are as stable as possible;
- 3) to minimise the long-term cost of the scheme by recognising the link between assets and adopting an investment strategy that balances risk and return;
- 4) to reflect the different characteristics of employing bodies in determining contribution rates where reasonable to do so; and
- 5) to use reasonable measures to reduce the risk to other employers and ultimately to the council tax payer from an employer defaulting on its pension obligations.

The aim is to achieve 100% solvency over a period of 20 years and to provide stability in employer contribution rates, where possible. Solvency is achieved when the funds held, plus future expected investment returns and future contributions, are sufficient to meet expected future pension benefits payable. When an employer’s funding level is less than the 100% funding target, then a deficit recovery plan will be put in place requiring additional employer contributions.

At the 2016 actuarial valuation, the Fund was assessed as 76.9% funded (71.5% at the March 2013 valuation). This corresponded to a deficit of £529m (2013 valuation: £597m) at that time.

The table below summarises the whole Fund Primary and Secondary Contribution rates at this triennial valuation. The Primary rate is the payroll weighted average of the underlying individual employer primary rates and the Secondary rate is the total of the underlying individual employer secondary rates (before any pre-payment or capitalisation of future contributions), calculated in accordance with the Regulations and CIPFA guidance.

Primary Rate (% of pay)	Secondary Rate (£000)		
	2017/18	2018/19	2019/20
1 April 2017-31 March 2020 17.4%	18,004	20,539	23,222

At the previous formal valuation at 31 March 2013, a different regulatory regime was in force. Therefore a contribution rate that is directly comparative to the rates above is not provided.

Individual employers' rates will vary from the common contribution rate depending on the demographic and actuarial factors particular to each employer. Full details of the contribution rates payable can be found in the 2016 Actuarial Valuation report on the Fund's website.

The market value of the Fund's assets as at the valuation date are compared against the value placed on the Fund's liabilities in today's terms (calculated using a market-based approach). By maintaining a link to the market in both cases, this helps ensure that the assets and liabilities are valued in a consistent manner. The calculation of the Fund's liabilities also explicitly allows for expected future pay and pension increases.

The principal assumptions were as follows:

Financial Assumptions

Future Assumed Returns at 2016	%
UK Equities	5.9
Overseas Equities	5.5
Fixed Interest GILTS	2.2
Index Linked GILTS	2.2
Corporate Bonds	3.4
Property & Infrastructure	3.8
Cash	2.5

Other Financial Assumptions	31 March 2013 % p.a.	31 March 2016 % p.a.
Discount rate	4.6	4.0
Price inflation (RPI)	3.3	3.2
Pay increases*	3.8	2.6
Pension increases	2.5	2.1
Revaluation of deferred pension	2.5	2.1
Revaluation of accrued CARE pension	2.5	2.1
Expenses	0.4	0.5

*An allowance is also made for promotional pay increases

Demographic Assumptions

The baseline longevity assumptions are a bespoke set specifically tailored to fit the membership profile of the Fund. These base tables are then projected using the CMI 2013 Model, allowing for a long-term rate of improvement of 1.25% per year. The assumed life expectancy from age 65 is as follows:

	31 March 2013	31 March 2016
Male		
Current Pensioners	22.2 years	22.1 years
Future Pensioners	24.5 years	24.1 years

Female			
	Current Pensioners	24.4 years	24.4 years
	Future Pensioners	26.8 years	26.6 years

Commutation assumption

It is assumed that future retirees will take 50% of the maximum additional tax-free lump sum up to HMRC limits for pre-April 2008 service and 75% of the maximum for post-April 2008 service.

50:50 option

It is assumed that 2% of active members (evenly distributed across age, service length and salary range) will take up the 50:50 option in the LGPS 2014 scheme.

Note 18. Actuarial Present Value of Promised Retirement Benefit

Below is the note provided by the Fund's Actuary, Hymans Robertson; to provide the Actuarial present value of the promised retirement benefits as required under the Code. The report titled 'Actuarial Valuation as at 31 March 2020 for IAS 19 purposes' referred to in the note can be obtained from the Pensions section at the County Council.

Pension Fund Accounts Reporting Requirement

Introduction

CIPFA's Code of Practice on Local Authority Accounting 2019/20 requires Administering Authorities of LGPS funds that prepare pension fund accounts to disclose what IAS26 refers to as the actuarial present value of promised retirement benefits. I have been instructed by the Administering Authority to provide the necessary information for the Lincolnshire Pension Fund ("the Fund").

The actuarial present value of promised retirement benefits is to be calculated similarly to the Defined Benefit Obligation under IAS19. There are three options for its disclosure in the pension fund accounts:

- showing the figure in the Net Assets Statement, in which case it requires the statement to disclose the resulting surplus or deficit;
- as a note to the accounts; or
- by reference to this information in an accompanying actuarial report.

If an actuarial valuation has not been prepared at the date of the financial statements, IAS26 requires the most recent valuation to be used as a base and the date of the valuation disclosed. The valuation should be carried out using assumptions in line with IAS19 and not the Fund's funding assumptions.

Present value of promised retirement benefits

Year ended	31 March 2020	31 March 2019
Active members (£m)	1,368	1,793
Deferred members (£m)	704	843
Pensioners (£m)	1,268	1,131
Total (£m)	3,340	3,780

The promised retirement benefits at 31 March 2020 have been projected using a roll forward approximation from the latest formal funding valuation as at 31 March 2019. The approximation involved in the roll forward model means that the split of benefits between the three classes of member may not be reliable. However, I am satisfied that the total figure is a reasonable estimate of the actuarial present value of benefit promises.

Note that the above figures at 31 March 2020 include an allowance for the “McCloud ruling”, i.e. an estimate of the potential increase in past service benefits arising from this case affecting public service pension schemes.

The figures include both vested and non-vested benefits, although the latter is assumed to have a negligible value. Further, I have not made any allowance for unfunded benefits.

It should be noted the above figures are appropriate for the Administering Authority only for preparation of the pension fund accounts. They should not be used for any other purpose (i.e. comparing against liability measures on a funding basis or a cessation basis).

Assumptions

The assumptions used are those adopted for the Administering Authority’s IAS19 report and are different as at 31 March 2020 and 31 March 2019. I estimate that the impact of the change in financial assumptions to 31 March 2020 is to decrease the actuarial present value by £339m. I estimate that the impact of the change in demographic and longevity assumptions is to decrease the actuarial present value by £118m.

Financial assumptions

Year ended (% p.a.)	31 March 2020	31 March 2019
Pension Increase Rate	1.9%	2.5%
Salary Increase Rate	2.2%	2.9%
Discount Rate	2.3%	2.4%

Longevity assumptions

Life expectancy is based on the Fund's VitaCurves with improvements in line with the CMI 2018 model, an allowance for smoothing of recent mortality experience and a long term rate of 1.25% p.a.. Based on these assumptions, the average future life expectancies at age 65 are summarised below:

	Males	Females
Current pensioners	22.1 years	24.4 years
Future pensioners (assumed to be aged 45 at the latest formal valuation)	24.1 years	26.6 years

Please note that the longevity assumptions have not changed since the previous IAS26 disclosure for the Fund.

Commutation assumptions

An allowance is included for future retirements to elect to take 50% of the maximum additional tax-free cash up to HMRC limits for pre-April 2008 service and 75% of the maximum tax-free cash for post-April 2008 service.

Sensitivity Analysis

CIPFA guidance requires the disclosure of the sensitivity of the results to the methods and assumptions used. The sensitivities regarding the principal assumptions used to measure the liabilities are set out below:

Sensitivity to the assumptions for the year ended 31 March 2020	Approximate % increase to liabilities	Approximate monetary amount (£m)
0.5% p.a. increase in the Pension Increase Rate	9%	299
0.5% p.a. increase in the Salary Increase Rate	1%	31
0.5% p.a. decrease in the Real Discount Rate	10%	332

The principal demographic assumption is the longevity assumption. For sensitivity purposes, I estimate that a 1 year increase in life expectancy would approximately increase the liabilities by around 3-5%.

Professional notes

This paper accompanies my covering report titled 'Actuarial Valuation as at 31 March 2020 for accounting purposes'. The covering report identifies the appropriate reliances and limitations for the use of the figures in this paper, together with further details regarding the professional requirements and assumptions.

Prepared on 18 May 2020 by:

Anne Cranston AFA

For and on behalf of Hymans Robertson LLP

Note 19. Current Assets

	31 March 2019 £000	31 March 20 £000
Short Term Debtors		
Contributions due - Employers	5,238	4,782
Contributions due - Employees	1,375	1,431
Sundry Debtors	2,479	1,078
Total Short Term Debtors	9,092	7,291
Cash Balances	10,710	13,071
Cash Balances	10,710	13,071
Total Current Assets	19,802	20,362

Note 20. Current Liabilities

	31 March 2019 £000	31 March 20 £000
Creditors		
Contributions – paid in advance	(34)	(122)
Sundry Debtors	(3,095)	(3,748)
Total	(3,129)	(3,870)

Note 21. Additional Voluntary Contributions

Scheme members may make additional contributions to enhance their pension benefits. All Additional Voluntary Contributions (AVC) are invested in a range of investment funds managed by the Prudential plc. At the year end, the value of AVC investments (excluding any final bonus) amounted to £8.077m (£8.683m in 2018/19). Member contributions of £0.909m (£0.998m in 2018/19) were received by the Prudential in the year to 31 March and £1.782m (£1.700m in 2018/19) was paid out to members.



The value of AVC funds and contributions received in the year are not included in the Fund Account and Net Assets Statement.

Note 22. Related Party Transactions

The Lincolnshire Pension Fund is administered by Lincolnshire County Council. During the reporting period, the Council incurred costs of £0.231m in relation to the administration of the Fund and was subsequently reimbursed by the Fund for these expenses. The Council is also the single largest employer of members of the Pension Fund and contributed £34.135m to the Fund in 2019/20. All monies owing to and due from the Fund were paid in year.

The Treasury Management section of the County Council acts on behalf of the Pension Fund to manage the cash position held in the Pension Fund bank account. This is amalgamated with the County Council's cash and lent out in accordance with the Council's Treasury Management policies. During the year, the average balance in the Pension Fund bank account was £13.016m and interest of £0.127m was earned over the year.

Each member of the Pension Fund Committee is required to declare their interests at each meeting and also is asked to sign an annual declaration disclosing any related party transactions. Three Committee members: Cllr P Key, A Antcliff (Employee Representative) and S Larter (Small Scheduled Bodies Representative) were contributing members of the Pension Fund during 2019/20. Cllr R Waller's daughter (District Council Representative) was also a contributing member of the scheme during 2019//20. S Larter (Small Scheduled Bodies Representative) is also a deferred member of the scheme.

Note 23. Key Management Personnel

Paragraph 3.9.4.4 of the Code exempts local authorities from the key management personnel disclosure requirements of IAS24, on the basis that the disclosure requirements for officer remuneration and members' allowances detailed in section 3.4 of the Code (which are derived from the requirements of Schedule 1 of the Accounts and Audit (England) Regulations 2015) satisfy the key management and personnel disclosure requirements of paragraph 16 of IAS24. This applies in equal measure to the accounts of Lincolnshire Pension Fund.

The Fund does not employ any staff directly. Lincolnshire County Council employs the staff involved in providing the duties as Administering Authority for the Fund (the pensions administration service is provided by West Yorkshire Pension Fund in partnership with the Lincolnshire Pension Fund). Disclosure of the remuneration awarded to key management personnel is included in the officers' remuneration disclosure in the notes to the Lincolnshire County Council Statement of Accounts for 2019/20 (at note 34), which is available on the Council's website at www.lincolnshire.gov.uk/finances.



Note 24. Contingent Liabilities and Contractual Commitments

At 31 March 2020 the fund had outstanding capital commitments (investments) to nineteen investment vehicles, amounting to £35.035m. These commitments relate to outstanding call payments due on unquoted limited partnerships making investments in private equity, property or infrastructure funds. The amounts 'called' by these funds are irregular in both size and timing over the lifetime of the funds.

Note 25. Contingent Assets

Seven admitted body employers in the Fund hold insurance bonds or equivalent cover to guard against the possibility of being unable to meet their pension obligations. These arrangements are drawn in favour of the Pension Fund and payment will only be triggered in the event of employer default.

No such defaults have occurred in 2019/20 (or 2018/19)

Note 26. Impairment Losses

The Fund has no recognised impairment losses.

Note 27. Exchange Rates Applied

The exchange rates used at 31 March 2020 per £1 sterling were:

Australian Dollar	2.0259
Canadian Dollar	1.7649
Swiss Franc	1.1997
Danish Krone	8.4327
Euro	1.1301
Hong Kong Dollar	9.6107
New Israeli Shekel	4.3863
Japanese Yen	133.8588
Norwegian Krone	13.0207
Swedish Krona	12.2851
Singapore Dollar	1.7655
US Dollar	1.2400

Glossary of Terms

Actuary – An independent consultant who advises the Fund and every three years formally reviews the assets and liabilities of the Fund and produces a report on the Fund’s financial position, known as the Actuarial Valuation.

Admitted Body – Private contractors that are admitted to the LGPS to protect member pension rights following a TUPE transfer, or a body which provides a public service which operates otherwise than for the purposes of gain.

Alternatives – Investment products other than traditional investments of stocks, bonds, cash or property. The term is used for tangible assets such as infrastructure and property, and financial assets such as private equity and derivatives.

Asset Allocation – Distribution of investments across asset categories, such as cash, equities and bonds. Asset allocation affects both risk and return, and is a central concept in financial planning and investment management.

Asset Pooling – In the context of the LGPS, this is the collaboration of several LGPS Funds to pool their investment assets in order to generate savings from economies of scale, as requested by MHCLG: ‘significantly reducing costs whilst maintaining investment performance’.

Auto Enrolment – UK employers have to automatically enrol their staff into a workplace pension if they meet certain criteria, and repeat this process every three years to re-enrol any employees that have opted out of the pension scheme.

Bonds – Certificate of debt issued by a government or company, promising regular payments on a specified date or range of dates, usually with final capital payment at redemption.

Career Average Revalued Earnings (CARE) Scheme – The pension at retirement will relate to your average salary over your career (while paying into the pension scheme). More precisely for the LGPS, it is based on pensionable earnings, increased in line with inflation as measured by the Consumer Price Index (CPI).

CIPFA – Chartered Institute of Public Finance & Accountancy.

Consumer Price Index (CPI) – The rate of increase in prices for goods and services. CPI is the official measure of inflation of consumer prices of the United Kingdom.

Counterparty – The other party that participates in a financial transaction. Every transaction must have a counterparty in order for the transaction to complete. More specifically, every buyer of an asset must be paired up with a seller that is willing to sell and vice versa.

Custodian – Organisation which is responsible for the safekeeping of assets, income collection and settlement of trades for a portfolio, independent from the asset management function.

Defined Benefit – An employer-sponsored retirement plan where employee benefits are assessed based on a formula using factors such as salary history and duration of employment. Public sector pension schemes are defined benefit schemes.

Derivative – Financial instrument whose value is dependent on the value of an underlying index, currency, commodity or other asset.

Diversification – Risk management technique which involves spreading investments across a range of different investment opportunities, thus helping to reduce overall risk. Risk reduction arises from the different investments not being perfectly correlated. Diversification can apply at various levels, such as diversification between countries, asset classes, sectors and individual securities.

Equities – Ordinary shares in UK and overseas companies traded on a stock exchange. Shareholders have an interest in the profits of the company and are entitled to vote at shareholders' meetings.

Fiduciary Duty – A legal obligation of one party to act in the best interest of another. The obligated party is typically a fiduciary, that is, someone entrusted with the care of money or property.

Final Salary – One type of defined benefit pension scheme where employee benefits are based on the person's final salary when they retire. The LGPS Scheme has moved from this to a CARE (career average revalued earnings) scheme in 2014.

Funding Level – The ratio of a pension fund's assets to its liabilities. Normally relates to defined benefit pension funds and used as a measure of the fund's ability to meet its future liabilities.

IFRS – International Financial Reporting Standards. Aim to standardise the reporting and information disclosed in the financial accounts of companies and other organisations globally.

Infrastructure – The public facilities and services needed to support residential development, including highways, bridges, schools, and sewer and water systems. A term usually associated with investment in transport, power and utilities projects.

Investment Strategy – The investor's long-term distribution of assets across various asset classes taking into consideration their objectives, their attitude to risk and timescale.

Liabilities – Financial liabilities are debts owed to creditors for outstanding payments due to be paid. Pension liabilities are the pensions benefits and payments that are due to be paid when someone retires.

Market Value – The price at which an investment can be bought or sold at a given date.

Pooled Investment Fund – A fund managed by an external Fund Manager in which a number of investors buy units. The total fund is then invested in a particular market or region. The underlying assets the funds hold on behalf of clients are quoted assets such as fixed interest bonds and equity shares. They are used as an efficient low-risk method of investing in the asset classes.

Portfolio – Block of assets generally managed under a single mandate.

Private Equity – Shares in unquoted companies. Usually high risk, high return in nature.

Return – Increase in value of an investment over a period of time, expressed as a percentage of the value of the investment at the start of the period.

Risk – Likelihood of a return different from that expected and the possible extent of the difference. Also used to indicate the volatility of different assets.

Scheduled Body – Public sector employers or designating bodies that have an automatic right and requirement to be an employer within the LGPS.

Settlement – Payment or collection of proceeds after trading a security. Settlement usually takes place sometime after the deal and price are agreed.

Stock Lending – Lending of stock from one investor to another that entitles the lender to continue to receive income generated by the stock plus an additional payment by the borrower.

Target – Managers are set a target for investment performance, such as 1% above benchmark per year over three year rolling periods.

Triennial Actuarial Valuation – Every three years the actuary formally reviews the assets and liabilities of the Lincolnshire Fund and produces a report on the Fund's financial position.

Audit Opinion

To follow



Additional Information Available

Additional information regarding the Pension Fund and the scheme is available by going to the shared service website www.wypf.org.uk

The following documents are included in this report, and can also be found by selecting Policy Statements on the home page, and then Lincolnshire Policies, on the WYPF shared website.

Funding Strategy Statement

This document is prepared in collaboration with the Fund's actuary, Hymans Robertson, and sets out the Fund's approach to funding its liabilities. It is reviewed in detail every three years.

Investment Strategy Statement

This document describes the key issues that govern the investment of the Pension Fund, including the approach to risk, the approach to pooling and the approach to environmental, social and governance (ESG) factors.

Communications Policy

This document details the methods of communication that the Pension Fund uses to comply with relevant legislation and to ensure that individuals and employers receive accurate and timely information about their pension arrangements.

Governance Compliance Statement

This document details how the Pension Fund is governed, and sets out where it complies with best practice guidance as published by the Ministry of Housing, Communities and Local Government.

Pensions Administration Strategy

This document details how the Pension Fund is administered within the shared service. It outlines the processes and procedures to allow the Funds and employers to work together in a cost-effective way to administer the LGPS, whilst maintaining an excellent level of service to members.

Lincolnshire Pension Fund

Funding Strategy Statement

March 2020

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Introduction

What is this document?

This is the Funding Strategy Statement (FSS) of the Lincolnshire Pension Fund (“the Fund”), which is administered by Lincolnshire County Council, (“the Administering Authority”).

It has been prepared by the Administering Authority in collaboration with the Fund’s actuary, Hymans Robertson LLP, and after consultation with the Fund’s employers, investment adviser and approval by the Pensions Committee. It is effective from March 2020, and for the setting of employer contribution rates calculated following the March 2019 Valuation.

What is the Lincolnshire Pension Fund?

The Fund is part of the national Local Government Pension Scheme (LGPS). The LGPS was set up by the UK Government to provide retirement and death benefits for local government employees, and those employed in similar or related bodies, across the whole of the UK. The Administering Authority runs the Lincolnshire Pension Fund, in effect the LGPS for the Lincolnshire area, to make sure it:

- receives the proper amount of contributions from employees and employers, and any transfer payments;
- invests the contributions appropriately, with the aim that the Fund’s assets grow over time with investment income and capital growth; and
- uses the assets to pay Fund benefits to the members (as and when they retire, for the rest of their lives), and to their dependants (as and when members die), as defined in the LGPS Regulations. Assets are also used to pay transfer values and administration costs.

The roles and responsibilities of the key parties involved in the management of the Fund are summarised in [Appendix B](#).

Why does the Fund need a Funding Strategy Statement?

Employees’ benefits are guaranteed by the LGPS Regulations, and do not change with market values or employer contributions. Investment returns will help pay for some of the benefits, but probably not all, and certainly with no guarantee. Employees’ contributions are fixed in those Regulations also, at a level which covers only part of the cost of the benefits.

Therefore, employers need to pay the balance of the cost of delivering the benefits to members and their dependants.

The FSS focuses on how employer liabilities are measured, the pace at which these liabilities are funded, and how employers or pools of employers pay for their own liabilities. This statement sets out how the Administering Authority has balanced the conflicting aims of:

- affordability of employer contributions,
- transparency of processes,
- stability of employers’ contributions, and
- prudence in the funding basis.

There are also regulatory requirements for an FSS, as given in [Appendix A](#).

The FSS is a summary of the Fund's approach to funding its liabilities, and this includes reference to the Fund's other policies; it is not an exhaustive statement of policy on all issues. The FSS forms part of a framework which includes:

- the LGPS Regulations;
- the Rates and Adjustments Certificate (confirming employer contribution rates currently for the next three years) which can be found in an appendix to the formal valuation report;
- the Fund's discretionary policies on admissions, cessations and bulk transfers;
- actuarial factors for valuing individual transfers, early retirement costs and the costs of buying added service; and
- the Fund's Investment Strategy Statement (see [Section 4](#))

How does the Fund and this FSS affect me?

This depends on who you are:

- a member of the Fund, i.e. a current or former employee, or a dependant: the Fund needs to be sure it is collecting and holding enough money so that your benefits are always paid in full;
- an employer in the Fund (or which is considering joining the Fund): you will want to know how your contributions are calculated from time to time, that these are fair by comparison to other employers in the Fund, in what circumstances you might need to pay more and what happens if you cease to be an employer in the Fund. Note that the FSS applies to all employers participating in the Fund;
- an Elected Member whose council participates in the Fund: you will want to be sure that the council balances the need to hold prudent reserves for members' retirement and death benefits, with the other competing demands for council money;
- a Council Tax payer: your council seeks to strike the balance above, and also to minimise cross-subsidies between different generations of taxpayers.

What does the FSS aim to do?

The FSS sets out the objectives of the Fund's funding strategy, such as:

- to ensure the long-term solvency of the Fund, using a prudent long term view. This will ensure that sufficient funds are available to meet all members'/dependants' benefits as they fall due for payment;
- to ensure that employer contribution rates are reasonably stable where appropriate;
- to minimise the long-term cash contributions which employers need to pay to the Fund, by recognising the link between assets and liabilities and adopting an investment strategy which balances risk and return (**NB** this will also minimise the costs to be borne by Council Tax payers);
- to reflect the different characteristics of different employers in determining contribution rates. This involves the Fund having a clear and transparent funding strategy to demonstrate how each employer can best meet its own liabilities over future years; and
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations.

How do I find my way around this document?

In [Section 2](#) there is a brief introduction to some of the main principles behind funding, i.e. deciding how much an employer should contribute to the Fund from time to time.

In [Section 3](#) we outline how the Fund calculates the contributions payable by different employers in different situations.

In [Section 4](#) we show how the funding strategy is linked with the Fund's investment strategy.

In [Section 5](#) we outline Section 13 reporting requirements.

In the [Appendices](#) we cover various issues in more detail if you are interested:

- A. the regulatory background, including how and when the FSS is reviewed,
- B. who is responsible for what,
- C. what issues the Fund needs to monitor, and how it manages its risks,
- D. some more details about the actuarial calculations required,
- E. the assumptions which the Fund actuary currently makes about the future,
- F. a [glossary](#) explaining the technical terms occasionally used here.

If you have any other queries please contact Jo Ray, Head of Pensions, in the first instance at e-mail address jo.ray@lincolnshire.gov.uk or on telephone number 01522 553656.

Basic Funding issues

(More detailed and extensive descriptions are given in [Appendix D](#)).

How does the actuary calculate the required contribution rate?

In essence this is a three-step process:

- Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See [Appendix E](#) for more details of what assumptions we make to determine that funding target;
- Determine the time horizon over which the employer should aim to achieve that funding target. See the table in [3.3](#) and [Note \(c\)](#) for more details;
- Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See [2.3](#) below, and the table in [3.3 Note \(e\)](#) for more details.

What is each employer's contribution rate?

This is described in more detail in [Appendix D](#). Employer contributions are normally made up of two elements:

- a) the estimated cost of benefits being built up each year, after deducting the members' own contributions and including an allowance for administration expenses. This is referred to as the "*Primary rate*", and is expressed as a percentage of members' pensionable pay; plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "*Secondary rate*". In broad terms, payment of the Secondary rate is in respect of benefits already accrued at the valuation date. The Secondary rate may be expressed as a percentage of pay or a monetary amount in each year.

The rates for all employers are shown in the Fund's Rates and Adjustments Certificate, which forms part of the formal Actuarial Valuation Report. Employers' contributions are expressed as minima, with employers able to pay contributions at a higher rate. Account of any higher rate will be taken by the Fund actuary at subsequent valuations, i.e. will be reflected as a credit when next calculating the employer's contributions.

What different types of employer participate in the Fund?

Historically the LGPS was intended for local authority employees only. However over the years, with the diversification and changes to delivery of local services, many more types and numbers of employers now participate. There are currently more employers in the Fund than ever before, a significant part of this being due to new academies.

In essence, participation in the LGPS is open to public sector employers providing some form of service to the local community. Whilst the majority of members will be local authority employees (and ex-employees), the majority of participating employers are those providing services in place of (or alongside) local authority services: academy schools, contractors, housing associations, charities, etc.

The LGPS Regulations define various types of employer as follows:

Scheduled bodies - councils, and other specified employers such as academies and further education establishments. These must provide access to the LGPS in respect of their employees who are not eligible to join another public sector scheme (such as the Teachers Scheme). These employers are so-called because they are specified in a schedule to the LGPS Regulations.

It is now possible for Local Education Authority schools to convert to academy status, and for other forms of school (such as Free Schools) to be established under the academies legislation. All such **academies (or Multi Academy Trusts)**, as employers of non-teaching staff, become separate new employers in the Fund. As academies are defined in the LGPS Regulations as “Scheduled Bodies”, the Administering Authority has no discretion over whether to admit them to the Fund, and the academy has no discretion whether to continue to allow its non-teaching staff to join the Fund. There has also been guidance issued by the MHCLG regarding the terms of academies’ membership in LGPS Funds.

Designating employers - employers such as town and parish councils are able to participate in the LGPS via resolution (and the Fund cannot refuse them entry where the resolution is passed). These employers can designate which of their employees are eligible to join the scheme.

Other employers are able to participate in the Fund via an admission agreement, and are referred to as ‘admission bodies’. These employers are generally those with a “community of interest” with another scheme employer – **community admission bodies** (“CAB”) or those providing a service on behalf of a scheme employer – **transferee admission bodies** (“TAB”). CABs will include housing associations and charities, TABs will generally be contractors. The Fund is able to set its criteria for participation by these employers and can refuse entry if the requirements as set out in the Fund’s admissions policy are not met. (NB The terminology CAB and TAB has been dropped from recent LGPS Regulations, which instead combine both under the single term ‘admission bodies’; however, we have retained the old terminology here as we consider it to be helpful in setting funding strategies for these different employers).

How does the calculated contribution rate vary for different employers?

All three steps above are considered when setting contributions (more details are given in [Section 3](#) and [Appendix D](#)).

1. The **funding target** is based on a set of assumptions about the future, (e.g. investment returns, inflation, pensioners’ life expectancies). If an employer is approaching the end of its participation in the Fund then its funding target may be set on a more prudent basis, so that its liabilities are less likely to be spread among other employers after its cessation;
2. The **time horizon** required is, the period over which the funding target is achieved. Employers may be given a lower time horizon if they have a less permanent anticipated membership, or do not have tax-raising powers to increase contributions if investment returns under-perform; and
3. The **likelihood of achieving** the funding target over that time horizon will be dependent on the Fund’s view of the strength of employer covenant and its funding profile. Where an employer is considered to be weaker, then the required likelihood will be set higher, which in turn will increase the required contributions (and vice versa).

For some employers it may be agreed to pool contributions, see [3.4](#).

Any costs of non ill-health early retirements must be paid by the employer, see [3.6](#).

Costs of ill-health early retirements are covered in [3.7](#) and [3.8](#).

How is a funding level calculated?

An employer’s “funding level” is defined as the ratio of:

- the market value of the employer’s share of assets (see [Appendix D](#), section [D5](#), for further details of how this is calculated), to

- the value placed by the actuary on the benefits built up to date for the employer's employees and ex-employees (the "liabilities"). The Fund actuary agrees with the Administering Authority the assumptions to be used in calculating this value.

If this is less than 100% then it means the employer has a shortfall, which is the employer's "deficit"; if it is more than 100% then the employer is said to be in "surplus". The amount of deficit or shortfall is the difference between the asset value and the liabilities value.

It is important to note that the funding level and deficit/surplus are only measurements at a particular point in time, on a particular set of assumptions about the future. Whilst we recognise that various parties will take an interest in these measures, for most employers the key issue is how likely it is that their contributions will be sufficient to pay for their members' benefits (when added to their existing asset share and anticipated investment returns).

In short, funding levels and deficits are short term, high level risk measures, whereas contribution-setting is a longer term issue.

How does the Fund recognise that contribution levels can affect council and employer service provision, and council tax?

The Administering Authority and the Fund actuary are acutely aware that, all other things being equal, a higher contribution required to be paid to the Fund will mean less cash available for the employer to spend on the provision of services. For instance:

- Higher Pension Fund contributions may result in reduced council spending, which in turn could affect the resources available for council services, and/or greater pressure on council tax levels;
- Contributions which Academies pay to the Fund will therefore not be available to pay for providing education; and
- Other employers will provide various services to the local community, perhaps through housing associations, charitable work, or contracting council services. If they are required to pay more in pension contributions to the LGPS then this may affect their ability to provide the local services at a reasonable cost.

Whilst all this is true, it should also be borne in mind that:

- The Fund provides invaluable financial security to local families, whether to those who formerly worked in the service of the local community who have now retired, or to their families after their death;
- The Fund must have the assets available to meet these retirement and death benefits, which in turn means that the various employers must each pay their own way. Lower contributions today will mean higher contributions tomorrow: deferring payments does not alter the employer's ultimate obligation to the Fund in respect of its current and former employees;
- Each employer will generally only pay for its own employees and ex-employees (and their dependants), not for those of other employers in the Fund;
- The Fund strives to maintain reasonably stable employer contribution rates where appropriate and possible. However, a recent shift in regulatory focus means that solvency within each generation is considered by the Government to be a higher priority than stability of contribution rates;
- The Fund wishes to avoid the situation where an employer falls so far behind in managing its funding shortfall that its deficit becomes unmanageable in practice: such a situation may lead to employer

insolvency and the resulting deficit falling on the other Fund employers. In that situation, those employers' services would in turn suffer as a result;

- Council contributions to the Fund should be at a suitable level, to protect the interests of different generations of council tax payers. For instance, underpayment of contributions for some years will need to be balanced by overpayment in other years; the council will wish to minimise the extent to which council tax payers in one period are in effect benefitting at the expense of those paying in a different period.

Overall, therefore, there is clearly a balance to be struck between the Fund's need for maintaining prudent funding levels, and the employers' need to allocate their resources appropriately. The Fund achieves this through various techniques which affect contribution increases to various degrees (see [3.1](#)). In deciding which of these techniques to apply to any given employer, the Administering Authority takes a view on the financial standing of the employer, i.e. its ability to meet its funding commitments and the relevant time horizon.

The Administering Authority will consider a risk assessment of that employer using a knowledge base which is regularly monitored and kept up-to-date. This will include such information as the type of employer, its membership profile and funding position, any guarantors or security provision, material changes anticipated, etc.

For instance, where the Administering Authority has reasonable confidence that an employer will be able to meet its funding commitments, then the Fund will permit options such as stabilisation ([see 3.3 Note \(b\)](#)), a longer time horizon relative to other employers, and/or a lower likelihood of achieving their funding target. Such options will temporarily produce lower contribution levels than would otherwise have applied. This is permitted in the expectation that the employer will still be able to meet its obligations for many years to come.

On the other hand, where there is doubt that an employer will be able to meet its funding commitments or withstand a significant change in its commitments, then a higher funding target, and/or a shorter time horizon relative to other employers, and/or a higher likelihood of achieving the target may be required.

The Fund actively seeks employer input, including to its funding arrangements, through various means: see [Appendix A](#).

What approach has the Fund taken to dealing with uncertainty arising from McCloud court case and its potential impact on the LGPS Benefit structure?

The LGPS benefit structure from 1 April 2014 is currently under review following the Government's loss of the right to appeal the McCloud and other similar court cases. The courts have ruled that the 'transitional protections' awarded to some members of public service pension schemes when the schemes were reformed (on 1 April 2014 in the case of the LGPS) were unlawful on the grounds of age discrimination. At the time of writing, the Ministry of Housing, Communities and Local Government (MHCLG) has not provided any details of changes as a result of the case. However, it is expected that benefits changes will be required and they will likely increase the value of liabilities. At present, the scale and nature of any increase in liabilities are unknown, which limits the ability of the Fund to make an accurate allowance.

[The LGPS Scheme Advisory Board \(SAB\) issued advice to LGPS funds in May 2019](#). As there was no finalised outcome of the McCloud case by 31 August 2019, the Fund Actuary has acted in line with SAB's advice and valued all member benefits in line with the current LGPS Regulations.

The Fund, in line with the advice in the SAB's note, has considered how to allow for this risk in the setting of employer contribution rates.

Uncertainty over the McCloud remedy impact makes it impossible to calculate an 'exact' loading so the Fund's preferred approach is to increase the likelihood of achieving the funding target over a particular time horizon by

5%. This will allow for an additional element of prudence and should mitigate the impact of any changes to benefits following the conclusion to the McCloud case. However, once the outcome of the McCloud case is known, the Fund may revisit the contribution rates set to ensure they remain appropriate.

The Fund has also considered the McCloud judgement in its approach to cessation valuations. Please see note (j) to table [3.3](#) for further information.

When will the next actuarial valuation be?

On 8 May 2019 MHCLG issued a consultation seeking views on (among other things) proposals to amend the LGPS valuation cycle in England and Wales from a three year (triennial) valuation cycle to a four year (quadrennial) valuation cycle.

On 7 October 2019 MHCLG confirmed the next LGPS valuation cycle in England and Wales will be 31 March 2022, regardless of the ongoing consultation. The Fund therefore instructed the Fund Actuary to certify contribution rates for employers for the period 1 April 2020 to 31 March 2023 as part of the 2019 valuation of the Fund.

Calculating contributions for individual Employers

General comments

A key challenge for the Administering Authority is to balance the need for stable, affordable employer contributions with the requirement to take a prudent, longer-term view of funding and ensure the solvency of the Fund. With this in mind, the Fund's three-step process identifies the key issues:

1. What is a suitably (but not overly) prudent funding target?
2. How long should the employer be permitted to reach that target? This should be realistic but not so long that the funding target is in danger of never actually being achieved.
3. What likelihood is required to reach that funding target? This will always be less than 100% as we cannot be certain of the future. Higher likelihood "bars" can be used for employers where the Fund wishes to reduce the risk that the employer ceases leaving a deficit to be picked up by other employers.

These and associated issues are covered in this Section.

The Administering Authority recognises that there may occasionally be particular circumstances affecting individual employers that are not easily managed within the rules and policies set out in the Funding Strategy Statement. Therefore the Administering Authority, reserves the right to direct the actuary to adopt alternative funding approaches on a case by case basis for specific employers.

The effect of paying lower contributions

In limited circumstances the Administering Authority may permit employers to pay contributions at a lower level than is assessed for the employer using the three step process above. At their absolute discretion the Administering Authority may:

- extend the time horizon for targeting full funding;
- adjust the required likelihood of meeting the funding target;
- permit an employer to participate in the Fund's stabilisation mechanisms;
- permit extended phasing in of contribution rises or reductions;
- pool contributions amongst employers with similar characteristics; and/or
- accept some form of security or guarantee in lieu of a higher contribution rate than would otherwise be the case.

Employers which are permitted to use one or more of the above methods will often be paying, for a time, contributions less than required to meet their funding target, over the appropriate time horizon with the required likelihood of success. Such employers should appreciate that:

- their true long term liability (i.e. the actual eventual cost of benefits payable to their employees and ex-employees) is not affected by the pace of paying contributions;
- lower contributions in the short term will result in a lower level of future investment returns on the employer's asset share. Thus, deferring a certain amount of contribution may lead to higher contributions in the long-term; and
- it may take longer to reach their funding target, all other things being equal.

Overleaf [\(3.3\)](#) is a summary of how the main funding policies differ for different types of employer, followed by more detailed notes where necessary.

[Section 3.4](#) onwards deals with various other funding issues which apply to all employers.

The different approaches used for different employers

Type of employer	Scheduled Bodies				Community Admission Bodies and Designating Employers		Transferee Admission Bodies*	Designating Bodies
Sub-type	Local Authorities, Police and Crime Commissioner	Other Scheduled Bodies	Colleges	Academies	Open to new entrants	Closed to new entrants	(all)	Internal Drainage Boards, Parish and Town Councils
Funding Target Basis used	Ongoing participation basis, assumes long-term Fund participation (see Appendix E)				Ongoing participation basis, but may move to “gilts exit basis” - see Note (a)		Contractor exit basis, assumes fixed contract term in the Fund (see Appendix E)	Ongoing, assumes long – term Fund participation (see Appendix E)
Primary rate approach	(see Appendix D – D.2)							
Stabilised contribution rate?	Yes - see Note (b)	No	No	No	No	No	No	No
Maximum time horizon – Note (c)	20 years	20 years	15 years	20 years	Outstanding term, subject to a maximum of 15 years	Outstanding term, subject to a maximum of 15 years	Outstanding contract term, subject to a maximum of 15 years	20 years
Secondary rate – Note (d)	Monetary amount (other than maintained schools where % of payroll)	% of payroll	Monetary amount	Monetary amount	Monetary amount	Monetary amount	Monetary amount	Monetary amount or % of payroll where pooled
Treatment of	Covered by	Preferred approach: contributions kept at Primary rate. However, reductions					Preferred approach:	Preferred

Type of employer	Scheduled Bodies				Community Admission Bodies and Designating Employers		Transferee Admission Bodies*	Designating Bodies
surplus	stabilisation arrangement	may be permitted by the Administering Authority					contributions kept at Primary rate. However, reductions may be permitted by the Administering Authority to reduce the surplus over the remaining contract term	approach: contributions kept at Primary rate. However, reductions may be permitted by the Administering Authority
Likelihood of achieving target – Note (e)	70%	80%	80%	80%	80%	80%	To be set on an employer by employer basis depending upon strength of covenant	75%
Phasing of contribution changes	Covered by stabilisation arrangement	None	None	None	None	None	None	None
Review of rates – Note (f)	Administering Authority reserves the right to review contribution rates and amounts, and the level of security provided, at regular intervals between valuations					Particularly reviewed in last 3 years of contract	Administering Authority reserves the right to review contribution rates and amounts, and the level of security provided, at regular intervals between valuations	
New	n/a	n/a	n/a	Note (g)	Note (h)	Notes (h) & (i)	n/a	

Type of employer	Scheduled Bodies				Community Admission Bodies and Designating Employers	Transferee Admission Bodies*	Designating Bodies
employer							
Cessation of participation: exit debt/credit payable	Cessation is assumed not to be generally possible, as Scheduled Bodies are legally obliged to participate in the LGPS. In the rare event of cessation occurring (machinery of Government changes for example), the cessation debt principles applied would be as per Note (j) .				Can be ceased subject to terms of admission agreement. Exit debt/credit will be calculated on a basis appropriate to the circumstances of cessation – see Note (j) .	Participation is assumed to expire at the end of the contract. Cessation debt/credit calculated on the contractor exit basis, unless the admission agreement is terminated early by the contractor in which case the low risk exit basis would apply. Letting employer will be liable for future deficits and contributions arising. See Note (j) for further details.	Can be ceased subject to passing of resolution. Cessation debt will be calculated on a basis appropriate to the circumstances of cessation - see Note (j) and 3.4 for small scheduled bodies pool.

* Where the Administering Authority recognises a fixed contribution rate agreement between a letting authority and a contractor, the certified employer contribution rate will be derived in line with the methodology specified in the risk sharing agreement. Additionally, in these cases, upon cessation the contractor’s assets and liabilities will transfer back to the letting employer with no crystallisation of any deficit or surplus. Further detail on fixed contribution rate agreements is set out in [note \(i\)](#).

Note (a) (Gilts exit basis for CABs and Designating Employers closed to new entrants)

In the circumstances where:

- the employer is a Designating Employer, or an Admission Body but not a Transferee Admission Body, and
- the employer has no guarantor, and
- the admission agreement is likely to terminate, or the employer is likely to lose its last active member, within a timeframe considered appropriate by the Administering Authority to prompt a change in funding,

the Administering Authority may set a higher funding target (e.g. based on the return from long-term gilt yields) by the time the agreement terminates or the last active member leaves, in order to protect other employers in the Fund. This policy will increase regular contributions and reduce, but not entirely eliminate, the possibility of a final deficit payment being required from the employer when a cessation valuation is carried out.

The Administering Authority also reserves the right to adopt the above approach in respect of those Designating Employers and Admission Bodies with no guarantor, where the strength of covenant is considered to be weak but there is no immediate expectation that the admission agreement will cease or the Designating Employer alters its designation.

Note (b) (Stabilisation)

Stabilisation is a mechanism where employer contribution rate variations from year to year are kept within a pre-determined range, thus allowing those employers' rates to be relatively stable. In the interests of stability and affordability of employer contributions, the Administering Authority, on the advice of the Fund Actuary, believes that stabilising contributions can still be viewed as a prudent longer-term approach. However, employers whose contribution rates have been "stabilised" (and may therefore be paying less than their theoretical contribution rate) should be aware of the risks of this approach and should consider making additional payments to the Fund if possible.

This stabilisation mechanism allows short term investment market volatility to be managed so as not to cause volatility in employer contribution rates, on the basis that a long term view can be taken on net cash inflow, investment returns and strength of employer covenant.

The current stabilisation mechanism applies if:

- the employer satisfies the eligibility criteria set by the Administering Authority (see below) and;
- there are no material events which cause the employer to become ineligible, e.g. significant reductions in active membership (due to outsourcing or redundancies), or changes in the nature of the employer (perhaps due to Government restructuring), or changes in the security of the employer.

On the basis of extensive modelling carried out for the 2019 valuation exercise (see [Section 4](#)), the standard stabilisation arrangements that will apply for employers are as follows. Other stabilisation arrangements may, on occasion, be allowed if the actuary considers them to be prudent.

Type of employer	Local Authority Council	Police and Crime Commissioner Pool
Stabilisation Mechanism	Fixed % of pay plus increasing monetary amount	Fixed % of pay plus increasing monetary amount
Maximum contribution increase per year	+1% of pay	+1% of pay
Maximum contribution decrease per year	-1% of pay	-1% of pay

The stabilisation criteria and limits will be reviewed at the next formal valuation. However the Administering Authority reserves the right to review the stabilisation criteria and limits at any time before then, on the basis of membership and/or employer changes as described above.

Note (c) (Maximum time horizon)

The maximum time horizon starts at the commencement of the revised contribution rate (1 April 2020 for the 2019 valuation). The Administering Authority would normally expect the same period to be used at successive triennial valuations, but would reserve the right to propose alternative time horizons, for example where there were no new entrants.

Note (d) (Secondary rate)

For employers where stabilisation is not being applied, the Secondary contribution rate for each employer, covering the period until the next formal valuation, will normally be set as a monetary amount. However, the Administering Authority reserves the right to amend these rates between formal valuations.

Note (e) (Likelihood of achieving funding target)

Each employer has its funding target calculated, and a relevant time horizon over which to reach that target. Contributions are set such that, combined with the employer’s current asset share and anticipated market movements over the time horizon, the funding target is achieved with a given minimum likelihood. A higher required likelihood bar will give rise to higher required contributions, and vice versa.

The way in which contributions are set using these three steps, and relevant economic projections, is described in further detail in [Appendix D](#).

Different likelihoods are set for different employers depending on their nature and circumstances: in broad terms, a higher likelihood will apply due to one or more of the following:

- the Fund believes the employer poses a greater funding risk than other employers,
- the employer does not have tax-raising powers;
- the employer does not have a guarantor or other sufficient security backing its funding position; and/or
- the employer is likely to cease participation in the Fund in the short or medium term.

Note (f) (Regular Reviews)

Such reviews may be triggered by significant events including but not limited to: significant reductions in payroll, altered employer circumstances, Government restructuring affecting the employer's business, or failure to pay contributions or arrange appropriate security as required by the Administering Authority.

The result of a review may be to require increased contributions (by strengthening the actuarial assumptions adopted and/or moving to monetary levels of deficit recovery contributions), and/or an increased level of security or guarantee.

Note (g) (New Academy conversions)

At the time of writing, the Fund's policies on academies' funding issues are as follows:

- i. The new academy will be regarded as a separate employer in its own right and will not be pooled with other employers in the Fund. The only exception is where the academy is part of a Multi Academy Trust (MAT) in which case the academy's figures will be calculated as below but can be combined with, for the purpose of setting contribution rates, those of the other academies in the MAT;
- ii. The new academy's past service liabilities on conversion will be calculated based on its active Fund members on the day before conversion. For the avoidance of doubt, these liabilities will include all past service of those members, but will exclude the liabilities relating to any ex-employees of the school who have deferred or pensioner status;
- iii. The new academy will be allocated an initial asset share from the ceding council's assets in the Fund. This asset share will be calculated using the estimated funding position of the ceding council at the date of academy conversion. The share will be based on the active members' funding level, having first allocated assets in the council's share to fully fund deferred and pensioner members. The assets allocated to the academy will be limited if necessary so that its initial funding level is subject to a maximum of 100%. The asset allocation will be based on market conditions and the academy's active Fund membership on the day prior to conversion;
- iv. The new academy's calculated contribution rate will be based on the time horizon and likelihood of achieving funding target outlined for Academies in the table in Section [3.3](#) above;
- v. It is possible for an academy to leave one MAT and join another. If this occurs, all active, deferred and pensioner members of the academy transfer to the new MAT. If two MAT's merge during the inter-valuation period, the merged MAT will pay the higher certified rates for the individual MAT's.

The Fund's policies on academies are subject to change in the light of any amendments to MHCLG and/or DfE guidance or removal of the formal guarantee currently provided to academies by the DfE. Any changes will be notified to academies, and will be reflected in a subsequent version of this FSS.

Note (h) (New Admission Bodies)

With effect from 1 October 2012, the LGPS 2012 Miscellaneous Regulations introduced mandatory new requirements for all Admission Bodies brought into the Fund from that date. Under these Regulations, all new Admission Bodies will be required to provide some form of security, such as a guarantee from the letting employer, an indemnity or a bond. The security is required to cover some or all of the following:

- the strain cost of any redundancy early retirements resulting from the premature termination of the contract;
- allowance for the risk of asset underperformance;
- allowance for the risk of a greater than expected rise in liabilities;

- allowance for the possible non-payment of employer and member contributions to the Fund; and/or
- the current deficit.

Transferee Admission Bodies: For all TABs, the security must be to the satisfaction of the Administering Authority as well as the letting employer, and will be reassessed on an annual basis, or other basis agreed with the ceding employer. See also [Note \(i\)](#) below.

Community Admission Bodies: The Administering Authority will only consider requests from CABs (or other similar bodies, such as section 75 NHS partnerships) to join the Fund if they are sponsored by a Scheduled Body with tax raising powers, guaranteeing their liabilities and also providing a form of security as above.

The above approaches reduce the risk to other employers in the Fund of potentially having to pick up any shortfall in respect of Admission Bodies ceasing with an unpaid deficit.

Note (i) (New Transferee Admission Bodies)

A new TAB usually joins the Fund as a result of the letting/outsourcing of some services from an existing employer (normally a Scheduled Body such as a council or academy) to another organisation (a “contractor”). This involves the TUPE transfer of some staff from the letting employer to the contractor. Consequently, for the duration of the contract, the contractor is a new participating employer in the Fund so that the transferring employees maintain their eligibility for LGPS membership. At the end of the contract the employees revert to the letting employer or to a replacement contractor.

Ordinarily, the TAB would be set up in the Fund as a new employer with responsibility for all the accrued benefits of the transferring employees; in this case, the contractor would usually be assigned an initial asset allocation equal to the past service liability value of the employees’ Fund benefits. The quid pro quo is that the contractor is then expected to ensure that its share of the Fund is also fully funded at the end of the contract: see [Note \(j\)](#).

Employers which “outsource” have flexibility in the way that they can deal with the pension risk potentially taken on by the contractor. In particular there are three different routes that such employers may wish to adopt. Clearly as the risk ultimately resides with the employer letting the contract, it is for them to agree the appropriate route with the contractor:

i) Pooling

Under this option the contractor is pooled with the letting employer. In this case, the contractor may pay the same rate as the letting employer, which may be under a stabilisation approach.

ii) Letting employer retains pre-contract risks

Under this option the letting employer would retain responsibility for assets and liabilities in respect of service accrued prior to the contract commencement date. The contractor would be responsible for the future liabilities that accrue in respect of transferred staff. The contractor’s contribution rate could vary from one valuation to the next. It would be liable for any deficit (or entitled to any surplus) at the end of the contract term in respect of assets and liabilities attributable to service accrued during the contract term. Please note, the level of surplus would be determined by the Administering Authority in accordance with the Regulations.

iii) Fixed contribution rate agreed

Under this option the contractor pays a fixed contribution rate throughout its participation in the Fund and on cessation does not pay any deficit or receive an exit credit. In other words, the pension risks “pass through” to the letting employer. The Administering Authority is willing to administer any of the above options as long as the approach is documented in the Admission Agreement as well as the transfer agreement. Any risk sharing agreement should ensure that some element of risk transfers to the contractor where it relates to their decisions and it is unfair to burden the letting employer with that risk. For example the contractor should typically be responsible for pension costs that arise from:

- above average pay increases, including the effect in respect of service prior to contract commencement even if the letting employer takes on responsibility for the latter under (ii) above; and
- redundancy and early retirement decisions.

Note (j) (Admission Bodies Ceasing)

Notwithstanding the provisions of the Admission Agreement, the Administering Authority may consider any of the following as triggers for the cessation of an admission agreement with any type of body:

- Last active member ceasing participation in the Fund (NB recent LGPS Regulation changes mean that the Administering Authority has the discretion to defer taking action for up to three years, so that if the employer acquires one or more active Fund members during that period then cessation is not triggered. The current Fund policy is that this is left as a discretion and may or may not be applied in any given case);
- The insolvency, winding up or liquidation of the Admission Body;
- Any breach by the Admission Body of any of its obligations under the Agreement that they have failed to remedy to the satisfaction of the Fund;
- A failure by the Admission Body to pay any sums due to the Fund within the period required by the Fund; or
- The failure by the Admission Body to renew or adjust the level of the bond or indemnity, or to confirm an appropriate alternative guarantor, as required by the Fund.

On cessation, the Administering Authority will instruct the Fund actuary to carry out a cessation valuation to determine whether there is any deficit or surplus. Where there is a deficit, payment of this amount in full would normally be sought from the Admission Body; where there is a surplus, the Administering Authority will determine the amount of exit credit to be paid in accordance with the Regulations. In making this determination, the Administering Authority will consider the extent of any surplus, the proportion of surplus arising as a result of the Admission Body’s employer contributions, any representations (such as risk sharing agreements or guarantees) and any other relevant factors.

As discussed in Section 2.7, the LGPS benefit structure from 1 April 2014 is currently under review following the Government’s loss of the right to appeal the McCloud and other similar court cases. The Fund has considered how it will reflect the current uncertainty regarding the outcome of this judgement in its approach to cessation valuations. For cessation valuations that are carried out before any changes to the LGPS benefit structure (from 1 April 2014) are confirmed, the Fund’s policy is that the actuary will make adjustments to the liability valuation, at individual member level, of the post 2014 benefit accrual, as an estimate of the possible impact of resulting benefit changes.

The Fund Actuary charges a fee for carrying out an employer's cessation valuation, and there will be other Fund administration expenses associated with the cessation which the Fund will recharge to the employer. For the purposes of the cessation valuation, this fee will be treated as an expense incurred by the employer and will be deducted from the employer's cessation surplus or added to the employer's cessation deficit, as appropriate. This process improves administrative efficiency as it reduces the number of transactions required to be made between the employer and the Fund following an employer's cessation. For non-Transferee Admission Bodies whose participation is voluntarily ended either by themselves or the Fund, or where a cessation event has been triggered, the Administering Authority must look to protect the interests of other ongoing employers. The actuary will therefore adopt an approach which, to the extent reasonably practicable, protects the other employers from the likelihood of any material loss emerging in future:

- (a) Where a guarantor does not exist then, in order to protect other employers in the Fund, the cessation liabilities and final surplus/deficit will normally be calculated using a "gilts exit basis", which is more prudent than the ongoing participation basis. This has no allowance for potential future investment outperformance above gilt yields, and has added allowance for future improvements in life expectancy. This could give rise to significant cessation debts being required.
- (b) Where there is a guarantor for future deficits and contributions, the details of the guarantee will be considered prior to the cessation valuation being carried out. In some cases the guarantor is simply guarantor of last resort and therefore the cessation valuation will be carried out consistently with the approach taken had there been no guarantor in place. Alternatively, where the guarantor is not simply guarantor of last resort, the cessation may be calculated using the ongoing participation basis or contractor exit basis as described in [Appendix E](#);
- (c) Again, depending on the nature of the guarantee, it may be possible to simply transfer the former Admission Body's liabilities and assets to the guarantor, without needing to crystallise any deficit or surplus. This approach may be adopted where the employer cannot pay the contributions due, and this is within the terms of the guarantee.

Under (a) and (b), any shortfall would usually be levied on the departing Admission Body as a single lump sum payment. If this is not possible then the Fund may spread the payment subject to there being some security in place for the employer such as a bond indemnity or guarantee.

In the event that the Fund is not able to recover the required payment in full, then the unpaid amounts fall to be shared amongst all of the other employers in the Fund. This may require an immediate revision to the Rates and Adjustments Certificate affecting other employers in the Fund, or instead be reflected in the contribution rates set at the next formal valuation following the cessation date.

As an alternative, where the ceasing Admission Body is continuing in business, the Fund at its absolute discretion reserves the right to enter into an agreement with the ceasing Admission Body. Under this agreement the Fund would accept an appropriate alternative security to be held against any deficit on the gilts exit basis, and would carry out the cessation valuation on the ongoing participation basis. Secondary contributions would be derived from this cessation debt. This approach would be monitored as part of each formal valuation and Secondary contributions would be reassessed as required. The Admission Body may terminate the agreement only via payment of the outstanding debt assessed on the gilts exit basis. Furthermore, the Fund reserves the right to revert to the "gilts exit basis" and seek immediate payment of any funding shortfall identified. The Administering Authority may need to seek legal advice in such cases, as the Admission Body would have no contributing members.

Pooled contributions

From time to time, with the advice of the Actuary, the Administering Authority may set up pools for employers with similar or complementary characteristics. This will always be in line with its broader funding strategy. Currently the pools in place within the Fund are as follows:

- Schools generally are also pooled with their funding Council. However there may be exceptions for specialist or independent schools.
- Smaller Transferee Admission Bodies may be pooled with the letting employer, provided all parties (particularly the letting employer) agree.
- Academies will be regarded as separate employers in their own right and will not be pooled with other employers in the Fund, the only exception being when the Academy is part of a Multi Academy Trust (MAT) and they have chosen to pool.

The intention of the pool is to minimise contribution rate volatility which would otherwise occur when members join, leave, take early retirement, receive pay rises markedly different from expectations, etc. Such events can cause large changes in contribution rates for very small employers in particular, unless these are smoothed out for instance by pooling across a number of employers.

On the other hand it should be noted that the employers in the pool will still have their own individual funding positions tracked by the Actuary, so that some employers will be much better funded, and others much more poorly funded, than the pool average. This therefore means that if any given employer was funding on a stand-alone basis, as opposed to being in the pool, then its contribution rate could be much higher or lower than the pool contribution rate.

It should also be noted that, if an employer is considering ceasing from the Fund, its required contributions would be based on its own funding position (rather than the pool average), and the cessation terms would also apply: this would mean potentially very different (and in particular possibly much higher) contributions would be required from the employer in that situation.

Employers who are permitted to enter (or remain in) a pool at the 2019 valuation will not normally be advised of their individual contribution rate unless agreed by the Administering Authority.

Community Admission Bodies that are deemed by the Administering Authority to have closed to new entrants are not usually permitted to participate in a pool.

Those employers which have been pooled are identified in the Rates and Adjustments Certificate. As at the 2019 valuation, separate pools were operated for:-

- Lincolnshire County Council;
- Police and Crime Commissioner for Lincolnshire;
- Lindsey Marsh Internal Drainage Board;
- Parish and Town Councils;
- The following Multi Academy Trusts:-
 - David Ross Education Trust
 - Boston Witham Academies Trust
 - Priory Federation of Academies
 - Tall Oaks Academy Trust
 - West Grantham Federation.
 - CIT Academies

- Horncastle Education Trust

Where an academy or school joins an existing MAT with a pooled rate, it will be given the primary rate of the MAT, subject to breaching any materiality level in membership increase. If the membership increase is considered to be material, the Fund has the discretion to require an interim valuation of the expanded MAT to be calculated. Any secondary rate attributable to the academy or school will be required to be paid in addition to any existing secondary rate of the MAT. The Fund has the discretion to negate the need for an increase to the secondary rate if the MAT is considered to be sufficiently in surplus at the last valuation.

Small Scheduled Bodies Pool

In addition to the pools mentioned above, there is a small scheduled body pool made up of the Town and Parish Council's within the Fund. Given that these generally have very few members, this is a way of sharing experience and smoothing out the effects of costly but relatively rare events such as ill-health retirements or deaths in service.

All employers within this pool will have the same contribution rate and individual employer assets and liabilities will not be tracked. The member experience across the pool will be shared.

It should also be noted that, if an employer, who is in the Small Scheduled Body Pool, is considering ceasing from the Fund, the leaving employer's required exit credit/debit to the Fund will be calculated on the ongoing funding position of the pool at the date of the leaving employer's cessation date.

Additional flexibility in return for added security

The Administering Authority may permit greater flexibility to the employer's contributions if the employer provides added security to the satisfaction of the Administering Authority.

Such flexibility includes a reduced rate of contribution, an extended time horizon, or permission to join a pool with another body (e.g. the Local Authority).

Such security may include, but is not limited to, a suitable bond, a legally-binding guarantee from an appropriate third party, or security over an employer asset of sufficient value.

The degree of flexibility given may take into account factors such as:

- the extent of the employer's deficit;
- the amount and quality of the security offered;
- the employer's financial security and business plan; and
- whether the admission agreement is likely to be open or closed to new entrants.

Non ill health early retirement costs

It is assumed that members' benefits are payable from the earliest age that the employee could retire without incurring a reduction to their benefit (and without requiring their employer's consent to retire). (**NB** the relevant age may be different for different periods of service, following the benefit changes from April 2008 and April 2014). Employers are required to pay additional contributions ('strain') wherever an employee retires before attaining this age. The actuary's funding basis makes no allowance for premature retirement except on grounds of ill-health.

It is generally expected that such strain costs are paid immediately, however, in exceptional circumstances and with the agreement of the Administering Authority, the payment may be spread.

Ill health early retirement costs

In the event of a member's early retirement on the grounds of ill-health, a funding strain will usually arise, which can be very large. Such strains are currently met by each employer, although individual employers may elect to take external insurance (see [3.8](#) below).

External Ill health insurance

If an employer provides satisfactory evidence to the Administering Authority of a current external insurance policy covering ill health early retirement strains, then:

- the employer's contribution to the Fund each year is reduced by the amount of that year's insurance premium, so that employer's total outlay (pension contribution plus insurance premium) is unchanged, and
- there is no need for monitoring of allowances.

When an active member retires on ill health early retirement the claim amount will be paid directly from the insurer to the insured employer. This amount should then be paid to the Fund to allow the employer's asset share to be credited.

The employer must keep the Administering Authority notified of any changes in the insurance policy's coverage or premium terms, or if the policy is ceased.

Employers with no remaining active members

In general, an employer ceasing in the Fund due to the departure of the last active member will pay a cessation debt or receive an exit credit on an appropriate basis (see [3.3](#), [Note \(j\)](#)) and consequently have no further obligation to the Fund. Thereafter it is expected that one of two situations will eventually arise:

- a) The employer's asset share runs out before all its ex-employees' benefits have been paid. In this situation the other Fund employers will be required to contribute to pay all remaining benefits: this will be done by the Fund actuary apportioning the remaining liabilities on a pro-rata basis at successive formal valuations;
- b) The last ex-employee or dependant dies before the employer's asset share has been fully utilised. In this situation the remaining assets would be apportioned pro-rata by the Fund's actuary to the other Fund employers.
- c) In exceptional circumstances the Fund may permit an employer with no remaining active members and a cessation deficit to continue contributing to the Fund. This would require the provision of a suitable security or guarantee, as well as a written ongoing commitment to fund the remainder of the employer's obligations over an appropriate period. The Fund would reserve the right to invoke the cessation requirements in the future, however. The Administering Authority may need to seek legal advice in such cases, as the employer would have no contributing members.

Policies on bulk transfers

Each case will be treated on its own merits, but in general:

- The Fund will not pay bulk transfers greater than the lesser of (a) the asset share of the transferring employer in the Fund, and (b) the value of the past service liabilities of the transferring members;
- The Fund will not grant added benefits to members bringing in entitlements from another Fund unless the asset transfer is sufficient to meet the added liabilities; and

- The Fund may permit shortfalls to arise on bulk transfers if the Fund employer has suitable strength of covenant and commits to meeting that shortfall in an appropriate period. This may require the employer's Fund contributions to increase between valuations.

Funding strategy and links to investment strategy

What is the Fund's investment strategy?

The Fund has built up assets over the years, and continues to receive contribution and other income. All of this must be invested in a suitable manner, which is the investment strategy.

Investment strategy is set by the Administering Authority, after consultation with the employers and after taking investment advice. The precise mix, manager make up and target returns are set out in the Investment Strategy Statement which is available to members and employers.

The investment strategy is set for the long-term, but is reviewed from time to time. Normally a full review is carried out as part of each actuarial valuation, and is kept under review annually between actuarial valuations to ensure that it remains appropriate to the Fund's liability profile.

The same investment strategy is currently followed for all employers.

What is the link between funding strategy and investment strategy?

The Fund must be able to meet all benefit payments as and when they fall due. These payments will be met by contributions (resulting from the funding strategy) or asset returns and income (resulting from the investment strategy). To the extent that investment returns or income fall short, then higher cash contributions are required from employers, and vice versa.

Therefore, the funding and investment strategies are inextricably linked.

How does the funding strategy reflect the Fund's investment strategy?

In the opinion of the Fund actuary, the current funding policy is consistent with the current investment strategy of the Fund. The actuary's assumptions for future investment returns (described in Appendix E) are based on the current benchmark investment strategy of the Fund. The future investment return assumptions underlying each of the fund's three funding bases include a margin for prudence, and are therefore also considered to be consistent with the requirement to take a "prudent longer-term view" of the funding of liabilities as required by the UK Government (see Appendix [A1](#)).

In the short term – such as the three yearly assessments at formal valuations – there is the scope for considerable volatility in asset values. However, the actuary takes a long term view when assessing employer contribution rates and the contribution rate setting methodology takes into account this potential variability. The Fund does not hold a contingency reserve to protect it against the volatility of equity investments.

Does the Fund monitor its overall funding position?

The Administering Authority monitors the relative funding position, i.e. changes in the relationship between asset values and the liabilities value, quarterly. It reports this to the quarterly Pensions Committee meetings, and these papers are public documents that can be viewed on the Administering Authorities website.

Statutory reporting and comparison to other LGPS Funds

Purpose

Under Section 13(4)(c) of the Public Service Pensions Act 2013 (“Section 13”), the Government Actuary’s Department must, following each triennial actuarial valuation, report to the Ministry of Housing, Communities & Local Government (MHCLG) on each of the LGPS Funds in England & Wales. This report will cover whether, for each Fund, the rate of employer contributions are set at an appropriate level to ensure both the solvency and the long term cost efficiency of the Fund.

This additional MHCLG oversight may have an impact on the strategy for setting contribution rates at future valuations.

Solvency

For the purposes of Section 13, the rate of employer contributions shall be deemed to have been set at an appropriate level to ensure solvency if:

- (a) the rate of employer contributions is set to target a funding level for the Fund of 100%, over an appropriate time period and using appropriate actuarial assumptions (where appropriateness is considered in both absolute and relative terms in comparison with other funds); and either
- (b) employers collectively have the financial capacity to increase employer contributions, and/or the Fund is able to realise contingent assets should future circumstances require, in order to continue to target a funding level of 100%; or
- (c) there is an appropriate plan in place should there be, or if there is expected in future to be, a material reduction in the capacity of fund employers to increase contributions as might be needed.

Long Term Cost Efficiency

The rate of employer contributions shall be deemed to have been set at an appropriate level to ensure long term cost efficiency if:

- i. the rate of employer contributions is sufficient to make provision for the cost of current benefit accrual,
- ii. with an appropriate adjustment to that rate for any surplus or deficit in the Fund.

In assessing whether the above condition is met, MHCLG may have regard to various absolute and relative considerations. A relative consideration is primarily concerned with comparing LGPS pension funds with other LGPS pension funds. An absolute consideration is primarily concerned with comparing Funds with a given objective benchmark.

Relative considerations include:

1. the implied deficit recovery period; and
2. the investment return required to achieve full funding after 20 years.

Absolute considerations include:

1. the extent to which the contributions payable are sufficient to cover the cost of current benefit accrual and the interest cost on any deficit;
2. how the required investment return under “relative considerations” above compares to the estimated future return being targeted by the Fund’s current investment strategy;
3. the extent to which contributions actually paid have been in line with the expected contributions based on the extant rates and adjustment certificate; and
4. the extent to which any new deficit recovery plan can be directly reconciled with, and can be demonstrated to be a continuation of, any previous deficit recovery plan, after allowing for actual Fund experience.

MHCLG may assess and compare these metrics on a suitable standardised market-related basis, for example where the local funds’ actuarial bases do not make comparisons straightforward.

Appendix A – Regulatory framework

A1 Why does the Fund need an FSS?

The Ministry of Housing, Communities and Local Government (MHCLG) has stated that the purpose of the FSS is:

*“to establish a **clear and transparent fund-specific strategy** which will identify how employers’ pension liabilities are best met going forward;*

*to support the regulatory framework to maintain **as nearly constant employer contribution rates as possible**; and*

*to take a **prudent longer-term view** of funding those liabilities.”*

These objectives are desirable individually, but may be mutually conflicting.

The requirement to maintain and publish a FSS is contained in LGPS Regulations which are updated from time to time. In publishing the FSS the Administering Authority has to have regard to any guidance published by Chartered Institute of Public Finance and Accountancy (CIPFA) (most recently in 2016) and to its Investment Strategy Statement.

This is the framework within which the Fund’s actuary carries out triennial valuations to set employers’ contributions and provides recommendations to the Administering Authority when other funding decisions are required, such as when employers join or leave the Fund. The FSS applies to all employers participating in the Fund.

A2 Does the Administering Authority consult anyone on the FSS?

Yes. This is required by LGPS Regulations. It is covered in more detail by the most recent CIPFA guidance, which states that the FSS must first be subject to “consultation with such persons as the authority considers appropriate”, and should include “a meaningful dialogue at officer and elected member level with council tax raising authorities and with corresponding representatives of other participating employers”.

In practice, for the Fund, the consultation process for this FSS was as follows:

- a) A draft version of the FSS was issued to all participating employers in November 2019 for comment;
- b) Comments were requested by 20 December, and answers provided;
- c) There was an Employers Forum on 4 March 2020 at which questions regarding the FSS could be raised and answered;
- d) Following the end of the consultation period the FSS was updated where required and approved at the Pensions Committee meeting on 19 March 2020, then published before the month end.

A3 How is the FSS published?

The FSS is made available through the following routes:

Published on the shared website, at www.wypf.org.uk;

A copy sent by e-mail to each participating employer in the Fund;

A copy sent to the Pension Board;

A full copy included in the annual report and accounts of the Fund;
Copies made available on request.

A4 How often is the FSS reviewed?

The FSS is reviewed in detail at least every three years as part of the triennial valuation (which may move to every four years in future – see Section 2.8). This version is expected to remain unaltered until it is consulted upon as part of the formal process for the next valuation.

It is possible that (usually slight) amendments may be needed within the three year period. These would be needed to reflect any regulatory changes, or alterations to the way the Fund operates (e.g. to accommodate a new class of employer). Any such amendments would be consulted upon as appropriate:

- trivial amendments would be simply notified at the next round of employer communications,
- amendments affecting only one class of employer would be consulted with those employers,
- other more significant amendments would be subject to full consultation.

In any event, changes to the FSS would need agreement by the Pensions Committee and would be included in the relevant Committee Meeting minutes.

A5 How does the FSS fit into other Fund documents?

The FSS is a summary of the Fund's approach to funding liabilities. It is not an exhaustive statement of policy on all issues, for example there are a number of separate statements published by the Fund including the Investment Strategy Statement, Governance Strategy and Communications Strategy. In addition, the Fund publishes an Annual Report and Accounts with up to date information on the Fund.

These documents can be found on the shared website at www.wypf.org.uk.

Appendix B – Responsibilities of key parties

The efficient and effective operation of the Fund needs various parties to each play their part.

B1 The Administering Authority should:-

- operate the Fund as per the LGPS Regulations;
- effectively manage any potential conflicts of interest arising from its dual role as Administering Authority and a Fund employer;
- collect employer and employee contributions, and investment income and other amounts due to the Fund;
- ensure that cash is available to meet benefit payments as and when they fall due;
- pay from the Fund the relevant benefits and entitlements that are due;
- invest surplus monies (i.e. contributions and other income which are not immediately needed to pay benefits) in accordance with the Fund's Investment Strategy Statement (ISS) and LGPS Regulations;
- communicate appropriately with employers so that they fully understand their obligations to the Fund;
- take appropriate measures to safeguard the Fund against the consequences of employer default;
- manage the valuation process in consultation with the Fund's actuary;
- provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see [Section 5](#));
- prepare and maintain a FSS and an ISS, after consultation;
- notify the Fund's actuary of material changes which could affect funding (this is covered in a separate agreement with the actuary); and
- monitor all aspects of the fund's performance and funding and amend the FSS and ISS as necessary and appropriate.

B2 The Individual Employer should:-

- deduct contributions from employees' pay correctly;
- pay all contributions, including their own as determined by the actuary, and submit accurate data submissions promptly by the due date;
- have a policy and exercise discretions within the regulatory framework;
- make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits, early retirement strain; and
- notify the Administering Authority promptly of all changes to its circumstances, prospects or membership, which could affect future funding.

B3 The Fund Actuary should:-

- prepare valuations, including the setting of employers' contribution rates. This will involve agreeing assumptions with the Administering Authority, having regard to the FSS and LGPS Regulations, and targeting each employer's solvency appropriately;

- provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see [Section 5](#));
- provide advice relating to new employers in the Fund, including the level and type of bonds or other forms of security (and the monitoring of these);
- prepare advice and calculations in connection with bulk transfers and individual benefit-related matters;
- assist the Administering Authority in considering possible changes to employer contributions between formal valuations, where circumstances suggest this may be necessary;
- advise on the termination of employers' participation in the Fund; and
- fully reflect actuarial professional guidance and requirements in the advice given to the Administering Authority.

B4 Other parties:-

- investment advisers (either internal or external) should ensure the Fund's ISS remains appropriate, and consistent with this FSS;
- investment managers, custodians and bankers should all play their part in the effective investment (and dis-investment) of Fund assets, in line with the ISS;
- auditors should comply with their auditing standards, ensure Fund compliance with all requirements, monitor and advise on fraud detection, and sign off annual reports and financial statements as required;
- governance advisers may be appointed to advise the Administering Authority on efficient processes and working methods in managing the Fund;
- legal advisers (either internal or external) should ensure the Fund's operation and management remains fully compliant with all regulations and broader local government requirements, including the Administering Authority's own procedures;
- MHCLG (assisted by the Government Actuary's Department) and the Scheme Advisory Board, should work with LGPS Funds to meet Section 13 requirements.

Appendix C – Key risks and controls

C1 Types of risk

The Administering Authority has an active risk management programme in place. The measures that it has in place to control key risks are summarised below under the following headings:

- financial;
- demographic;
- regulatory; and
- governance.

C2 Financial risks

Risk	Summary of Control Mechanisms
Fund assets fail to deliver returns in line with the anticipated returns underpinning the valuation of liabilities and contribution rates over the long-term.	<p>Only anticipate long-term returns on a relatively prudent basis to reduce risk of under-performing.</p> <p>Assets invested on the basis of specialist advice, in a suitably diversified manner across asset classes, geographies, managers, etc.</p> <p>Analyse progress at three yearly valuations for all employers.</p> <p>Inter-valuation roll-forward of liabilities between valuations at whole Fund level.</p>
Inappropriate long-term investment strategy.	<p>Overall investment strategy options considered as an integral part of the funding strategy. Used asset liability modelling to measure 4 key outcomes.</p> <p>Chosen option considered to provide the best balance.</p>
Active investment manager under-performance relative to benchmark.	<p>Quarterly investment monitoring analyses market performance and active managers relative to their index benchmark.</p>
Pay and price inflation significantly more than anticipated.	<p>The focus of the actuarial valuation process is on real returns on assets, net of price and pay increases.</p> <p>Inter-valuation monitoring, as above, gives early warning.</p> <p>Some investment in bonds also helps to mitigate this risk.</p> <p>Employers pay for their own salary awards and should be mindful of the geared effect on pension liabilities of any bias in pensionable pay rises towards longer-</p>

Risk	Summary of Control Mechanisms
	serving employees.
Effect of possible increase in employer’s contribution rate on service delivery and admission/scheduled bodies	An explicit stabilisation mechanism has been agreed as part of the funding strategy. Other measures are also in place to limit sudden increases in contributions.
Orphaned employers give rise to added costs for the Fund	<p>The Fund seeks a cessation debt (or security/guarantor) to minimise the risk of this happening in the future.</p> <p>If it occurs, the Actuary calculates the added cost spread pro-rata among all employers – (see 3.9).</p>
Effect of possible asset underperformance as a result of climate change	The Fund has a responsible investment policy and works with external managers to minimise the investment risk through stock selection and engagement.

C3 Demographic risks

Risk	Summary of Control Mechanisms
Pensioners living longer, thus increasing cost to Fund.	<p>Set mortality assumptions with some allowance for future increases in life expectancy.</p> <p>The Fund Actuary has direct access to the experience of over 50 LGPS funds which allows early identification of changes in life expectancy that might in turn affect the assumptions underpinning the valuation.</p>
Maturing Fund – i.e. proportion of actively contributing employees declines relative to retired employees.	Continue to monitor at each valuation, monetary amounts to be continued to be paid rather than % of pay and consider alternative investment strategies.
Deteriorating patterns of early retirements	<p>Employers are charged the extra cost of non ill-health retirements following each individual decision.</p> <p>Employer ill health retirement experience is monitored, and insurance is an option.</p>
Reductions in payroll causing insufficient deficit recovery payments	<p>In many cases this may not be sufficient cause for concern, and will in effect be caught at the next formal valuation. However, there are protections where there is concern, as follows:</p> <p>Employers in the stabilisation mechanism may be brought out of that mechanism to permit appropriate</p>

Risk	Summary of Control Mechanisms
	<p>contribution increases (see Note (b) to 3.3).</p> <p>For other employers, review of contributions is permitted in general between valuations (see Note (f) to 3.3) and may require a move in deficit contributions from a percentage of payroll to fixed monetary amounts.</p>

C4 Regulatory risks

Risk	Summary of Control Mechanisms
<p>Changes to national pension requirements and/or HMRC rules e.g. changes arising from public sector pensions reform.</p>	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>The Administering Authority is monitoring the progress on the McCloud court case and will consider an interim valuation or other appropriate action once more information is known.</p> <p>The government's long term preferred solution to GMP indexation and equalisation - conversion of GMPs to scheme benefits - was built into the 2019 valuation.</p>
<p>Time, cost and/or reputational risks associated with any MHCLG intervention triggered by the Section 13 analysis (see Section 5).</p>	<p>Take advice from Fund Actuary on position of Fund as at prior valuation, and consideration of proposed valuation approach relative to anticipated Section 13 analysis.</p>
<p>Changes by Government to particular employer participation in LGPS Funds, leading to impacts on funding and/or investment strategies.</p>	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>Take advice from Fund Actuary on impact of changes on the Fund and amend strategy as appropriate.</p>

C5 Governance risks

Risk	Summary of Control Mechanisms
<p>Administering Authority unaware of structural changes in an employer’s membership (e.g. large fall in employee members, large number of retirements) or not advised of an employer closing to new entrants.</p>	<p>The Administering Authority has a close relationship with employing bodies and communicates required standards e.g. for submission of data.</p> <p>The Actuary may revise the rates and Adjustments certificate to increase an employer’s contributions between triennial valuations</p> <p>Deficit contributions may be expressed as monetary amounts.</p>
<p>Actuarial or investment advice is not sought, or is not heeded, or proves to be insufficient in some way</p>	<p>The Administering Authority maintains close contact with its specialist advisers.</p> <p>Advice is delivered via formal meetings involving Elected Members, and recorded appropriately.</p> <p>Actuarial advice is subject to professional requirements such as peer review.</p>
<p>Administering Authority failing to commission the Fund Actuary to carry out a termination valuation for a departing Admission Body.</p>	<p>The Administering Authority requires employers with Best Value contractors to inform it of forthcoming changes.</p> <p>Community Admission Bodies’ memberships are monitored and, if active membership decreases, steps will be taken.</p>
<p>An employer ceasing to exist with insufficient funding or adequacy of a bond.</p>	<p>The Administering Authority believes that it would normally be too late to address the position if it was left to the time of departure.</p> <p>The risk is mitigated by:</p> <p>Seeking a funding guarantee from another scheme employer, or external body, where-ever possible (see Notes (h) and (i) to 3.3).</p> <p>Alerting the prospective employer to its obligations and encouraging it to take independent actuarial advice.</p> <p>Vetting prospective employers before admission.</p> <p>Where permitted under the regulations requiring a bond to protect the Fund from various risks.</p> <p>Requiring new Community Admission Bodies to have a</p>

Risk	Summary of Control Mechanisms
	<p>guarantor.</p> <p>Reviewing bond or guarantor arrangements at regular intervals (see Note (f) to 3.3).</p> <p>Reviewing contributions well ahead of cessation if thought appropriate (see Note (a) to 3.3).</p>
<p>An employer ceasing to exist resulting in an exit credit being payable</p>	<p>The Administering Authority regularly monitors admission bodies coming up to cessation</p> <p>The Administering Authority invests in liquid assets to ensure that exit credits can be paid when required.</p>

Appendix D – The calculation of Employer contributions

In [Section 2](#) there was a broad description of the way in which contribution rates are calculated. This Appendix considers these calculations in much more detail.

As discussed in [Section 2](#), the actuary calculates the required contribution rate for each employer using a three-step process:

- Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See [Appendix E](#) for more details of what assumptions we make to determine that funding target;
- Determine the time horizon over which the employer should aim to achieve that funding target. See the table in [3.3](#) and [Note \(c\)](#) for more details;
- Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See the table in [3.3 Note \(e\)](#) for more details.

The calculations involve actuarial assumptions about future experience, and these are described in detail in [Appendix E](#).

D1 What is the difference between calculations across the whole Fund and calculations for an individual employer?

Employer contributions are normally made up of two elements:

- a) the estimated cost of ongoing benefits being accrued, referred to as the "Primary contribution rate" (see [D2](#) below); plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "Secondary contribution rate" (see [D3](#) below).

The contribution rate for each employer is measured as above, appropriate for each employer's assets, liabilities and membership. The whole Fund position, including that used in reporting to MHCLG (see section 5), is calculated in effect as the sum of all the individual employer rates. MHCLG currently only regulates at whole Fund level, without monitoring individual employer positions.

D2 How is the Primary contribution rate calculated?

The Primary element of the employer contribution rate is calculated with the aim that these contributions will meet benefit payments in respect of members' **future** service in the Fund. This is based upon the cost (in excess of members' contributions) of the benefits which employee members earn from their service each year.

The Primary rate is calculated separately for all the employers, although employers within a pool will pay the contribution rate applicable to the pool as a whole. The Primary rate is calculated such that it is projected to:

1. meet the required funding target for all future years' accrual of benefits*, excluding any accrued assets,
2. within the determined time horizon (see [note 3.3 Note \(c\)](#) for further details),

3. with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see [3.3 Note \(e\)](#) for further details).

* The projection is for the current active membership where the employer no longer admits new entrants, or additionally allows for new entrants where this is appropriate.

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund's actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in [Appendix E](#). The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

The approach includes expenses of administration to the extent that they are borne by the Fund, and includes allowances for benefits payable on death in service and on ill health retirement.

D3 How is the Secondary contribution rate calculated?

The Fund aims for the employer to have assets sufficient to meet 100% of its accrued liabilities at the end of its funding time horizon based on the employer's funding target assumptions (see [Appendix E](#)).

The Secondary rate is calculated as the balance over and above the Primary rate, such that the total contribution rate is projected to:

- meet the required funding target relating to combined past and future service benefit accrual, including accrued asset share (see [D5](#) below)
- at the end of the determined time horizon (see [3.3 Note \(c\)](#) for further details)
- with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see [3.3 Note \(e\)](#) for further details).

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund Actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in [Appendix E](#). The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

D4 What affects a given employer's valuation results?

The results of these calculations for a given individual employer will be affected by:

1. past contributions relative to the cost of accruals of benefits;
2. different liability profiles of employers (e.g. mix of members by age, gender, service vs. salary);
3. the effect of any differences in the funding target, i.e. the valuation basis used to value the employer's liabilities at the end of the time horizon;
4. any different time horizons;
5. the difference between actual and assumed rises in pensionable pay;
6. the difference between actual and assumed increases to pensions in payment and deferred pensions;
7. the difference between actual and assumed retirements on grounds of ill-health from active status;

8. the difference between actual and assumed amounts of pension ceasing on death;
9. the additional costs of any non ill-health retirements relative to any extra payments made; and/or
10. differences in the required likelihood of achieving the funding target.

D5 How is each employer's asset share calculated?

The Administering Authority does not operate bank accounts or investment mandates for each employer. Therefore it cannot account for each employer's assets separately. Instead, the Fund actuary must apportion the assets of the whole Fund between the individual employers. There are broadly two ways to do this;

- 1) A technique known as "analysis of surplus" in which the Fund actuary estimates the surplus/deficit of an employer at the current valuation date by analysing movements in the surplus/deficit from the previous actuarial valuation date. The estimated surplus/deficit is compared to the employer's liability value to calculate the employer's asset value. The actuary will quantify the impact of investment, membership and other experience to analyse the movement in the surplus/deficit. This technique makes a number of simplifying assumptions due to the unavailability of certain items of information. This leads to a balancing, or miscellaneous, item in the analysis of surplus, which is split between employers in proportion to their asset shares.
- 2) A 'cashflow approach' in which an employer's assets are tracked over time allowing for cashflows paid in (contributions, transfers in etc.), cashflows paid out (benefit payments, transfers out etc.) and investment returns on the employer's assets.

Until 31 March 2016 the Administering Authority used the 'analysis of surplus' approach to apportion the Fund's assets between individual employers.

Since then, the Fund has adopted a cashflow approach for tracking individual employer assets.

The Fund Actuary uses the Hymans Robertson's proprietary "HEAT" system to track employer assets on a monthly basis. Starting with each employer's assets from the previous month end, cashflows paid in/out and investment returns achieved on the Fund's assets over the course of the month are added to calculate an asset value at the month end.

The Fund is satisfied that this new approach provides the most accurate asset allocations between employers that is reasonably possible at present.

D6 How does the Fund adjust employer asset shares when an individual member moves from one employer in the Fund to another?

Under the cashflow approach for tracking employer asset shares, the Fund has allowed for any individual members transferring from one employer in the Fund to another, via the transfer of a sum from the ceding employer's asset share to the receiving employer's asset share. This sum is equal to the member's Cash Equivalent Transfer Value (CETV) as advised by the Fund's administrators.

Appendix E – Actuarial assumptions

E1 What are the actuarial assumptions used to calculate employer contribution rates?

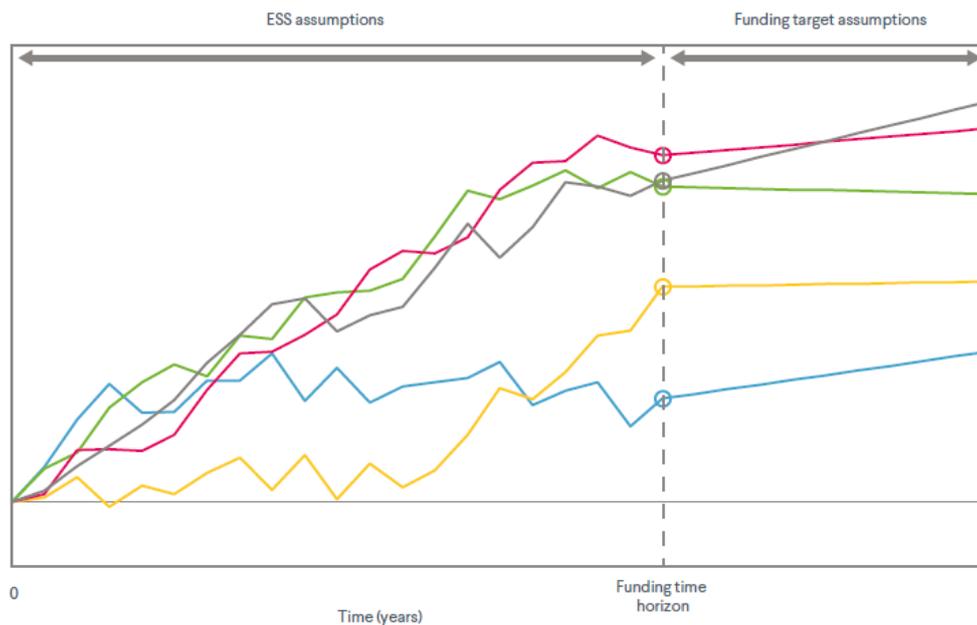
These are expectations of future experience used to place a value on future benefit payments (“the liabilities”) and future asset values. Assumptions are made about the amount of benefit payable to members (the financial assumptions) and the likelihood or timing of payments (the demographic assumptions). For example, financial assumptions include investment returns, salary growth and pension increases; demographic assumptions include life expectancy, probabilities of ill-health early retirement, and proportions of member deaths giving rise to dependants’ benefits.

Changes in assumptions will affect the funding target and required contribution rate. However, different assumptions will not of course affect the actual benefits payable by the Fund in future.

The actuary’s approach to calculating employer contribution rates involves the projection of each employer’s future benefit payments, contributions and investment returns into the future under 5,000 possible economic scenarios. Future inflation (and therefore benefit payments) and investment returns for each asset class (and therefore employer asset values) are variables in the projections. By projecting the evolution of an employer’s assets and benefit payments 5,000 times, a contribution rate can be set that results in a sufficient number of these future projections (determined by the employer’s required likelihood) being successful at the end of the employer’s time horizon. In this context, a successful contribution rate is one which results in the employer having met its funding target at the end of the time horizon.

Setting employer contribution rates therefore requires two types of assumptions to be made about the future:

1. Assumptions to project the employer’s assets, benefits and cashflows to the end of the funding time horizon. For this purpose the actuary uses Hymans Robertson’s proprietary stochastic economic model - the Economic Scenario Service (“ESS”).
2. Assumptions to assess whether, for a given projection, the funding target is satisfied at the end of the time horizon. For this purpose, the Fund has three different funding bases.



Details on the ESS assumptions and funding target assumptions are included below (in E2 and E3 respectively).

E2 What assumptions are used in the ESS?

The actuary uses Hymans Robertson’s ESS model to project a range of possible outcomes for the future behaviour of asset returns and economic variables. With this type of modelling, there is no single figure for an assumption about future inflation or investment returns. Instead, there is a range of what future inflation or returns will be which leads to likelihoods of the assumption being higher or lower than a certain value.

The ESS is a complex model to reflect the interactions and correlations between different asset classes and wider economic variables. The table below shows the calibration of the model as at 31 March 2019. All returns are shown net of fees and are the annualised total returns over 5, 10 and 20 years, except for the yields which refer to the simulated yields at that time horizon.

	Annualised total returns							RPI inflation expectation	17 year real govt bond yield	17 year govt bond yield	
	Cash	Index Linked Gilts (medium)	Fixed Interest Gilts (medium)	UK Equity	Overseas Equity	Property	A rated corporate bonds (medium)				
5 years	16th %ile	-0.4%	-2.3%	-2.9%	-4.1%	-4.1%	-3.5%	-2.7%	1.9%	-2.5%	0.8%
	50th %ile	0.7%	0.5%	0.3%	4.0%	4.1%	2.4%	0.8%	3.3%	-1.7%	2.1%
	84th %ile	2.0%	3.3%	3.4%	12.7%	12.5%	8.8%	4.0%	4.9%	-0.8%	3.6%
10 years	16th %ile	-0.2%	-1.8%	-1.3%	-1.5%	-1.4%	-1.5%	-0.9%	1.9%	-2.0%	1.2%
	50th %ile	1.3%	0.0%	0.2%	4.6%	4.7%	3.1%	0.8%	3.3%	-0.8%	2.8%
	84th %ile	2.9%	1.9%	1.7%	10.9%	10.8%	7.8%	2.5%	4.9%	0.4%	4.8%
20 years	16th %ile	0.7%	-1.1%	0.1%	1.2%	1.3%	0.6%	0.7%	2.0%	-0.7%	2.2%
	50th %ile	2.4%	0.3%	1.0%	5.7%	5.8%	4.3%	1.9%	3.2%	0.8%	4.0%
	84th %ile	4.5%	2.0%	2.0%	10.3%	10.4%	8.1%	3.0%	4.7%	2.2%	6.3%
	Volatility (Disp) (1 yr)	1%	7%	10%	17%	17%	14%	11%	1%		

E3 What assumptions are used in the funding target?

At the end of an employer’s funding time horizon, an assessment will be made – for each of the 5,000 projections – of how the assets held compare to the value of assets required to meet the future benefit payments (the funding target). Valuing the cost of future benefits requires the actuary to make assumptions about the following financial factors:

- Benefit increases and CARE revaluation
- Salary growth
- Investment returns (the “discount rate”)

Each of the 5,000 projections represents a different prevailing economic environment at the end of the funding time horizon and so a single, fixed value for each assumption is unlikely to be appropriate for every projection. For example, a high assumed future investment return (discount rate) would not be prudent in projections with a weak outlook for economic growth. Therefore, instead of using a fixed value for each assumption, the actuary references economic indicators to ensure the assumptions remain appropriate for the prevailing economic environment in each projection. The economic indicators the actuary uses are: future inflation expectations and the prevailing risk free rate of return (the yield on long term UK government bonds is used as a proxy for this rate).

The Fund has three funding bases which will apply to different employers depending on their type. Each funding basis has a different assumption for future investment returns when determining the employer’s funding target.

Funding basis	Ongoing participation basis	Contractor exit basis	Low risk exit basis
Employer type	All employers except Transferee Admission Bodies and closed Community Admission Bodies	Transferee Admission Bodies	Community Admission Bodies that are closed to new entrants
Investment return assumption underlying the employer’s funding target (at the end of its time horizon)	Long term government bond yields plus an asset outperformance assumption (AOA) of 2.0% p.a.	Long term government bond yields plus an AOA equal to the AOA used to allocate assets to the employer on joining the Fund	Long term government bond yields with no allowance for outperformance on the Fund’s assets

E4 What other assumptions apply?

The following assumptions are those of the most significance used in both the projection of the assets, benefits and cashflows and in the funding target.

a) Salary growth

After discussion with Fund officers, the salary increase assumption at the 2019 valuation has been set to be a blended rate combined of:

1. 2% p.a. until 31 March 2024, followed by
2. retail prices index (RPI) less 0.5% p.a. thereafter.

This gives a single “blended” assumption of RPI less 0.7% p.a. This is a minor change from the previous valuation, which assumed a blended assumption of RPI less 0.6% per annum. The change has led to a very small increase in the funding target (all other things being equal).

b) Pension increases

Since 2011 the consumer prices index (CPI), rather than RPI, has been the basis for increases to public sector pensions in deferment and in payment. Note that the basis of such increases is set by the Government, and is not under the control of the Fund or any employers.

At this valuation, we have continued to assume that CPI is 1.0% per annum lower than RPI. (Note that the reduction is applied in a geometric, not arithmetic, basis).

c) Life expectancy

The demographic assumptions are intended to be best estimates of future experience in the Fund based on past experience of LGPS funds which participate in Club Vita, the longevity analytics service used by the Fund, and endorsed by the actuary.

The longevity assumptions that have been adopted at this valuation are a bespoke set of “VitaCurves”, produced by the Club Vita’s detailed analysis, which are specifically tailored to fit the membership profile of the Fund. These curves are based on the data provided by the Fund for the purposes of this valuation.

Allowance has been made in the ongoing valuation basis for future improvements in line with the 2018 version of the Continuous Mortality Investigation model published by the Actuarial Profession and a 1.25% per annum minimum underpin to future reductions in mortality rates. This updated allowance for future improvements will generally result in lower life expectancy assumptions and hence a reduced funding target (all other things being equal).

The approach taken is considered reasonable in light of the long term nature of the Fund and the assumed level of security underpinning members' benefits.

d) General

The same financial assumptions are adopted for most employers (on the ongoing participation basis identified above), in deriving the funding target underpinning the Primary and Secondary rates: as described in [\(3.3\)](#), these calculated figures are translated in different ways into employer contributions, depending on the employer's circumstances.

The demographic assumptions, in particular the life expectancy assumption, in effect vary by type of member and so reflect the different membership profiles of employers.

Appendix F – Glossary

Funding basis	The combined set of assumptions made by the actuary, regarding the future, to calculate the value of the funding target at the end of the employer’s time horizon. The main assumptions will relate to the level of future investment returns, salary growth, pension increases and longevity. More prudent assumptions will give a higher funding target, whereas more optimistic assumptions will give a lower funding target.
Administering Authority	The council with statutory responsibility for running the Fund, in effect the Fund’s “trustees”.
Admission Bodies	Employers where there is an Admission Agreement setting out the employer’s obligations. These can be Community Admission Bodies or Transferee Admission Bodies. For more details (see 2.3).
Covenant	The assessed financial strength of the employer. A strong covenant indicates a greater ability (and willingness) to pay for pension obligations in the long run. A weaker covenant means that it appears that the employer may have difficulties meeting its pension obligations in full over the longer term.
Designating Employer	Employers such as town and parish councils that are able to participate in the LGPS via resolution. These employers can designate which of their employees are eligible to join the Fund.
Employer	An individual participating body in the Fund, which employs (or used to employ) members of the Fund. Normally the assets and funding target values for each employer are individually tracked, together with its Primary rate at each valuation .
Gilt	A UK Government bond, ie a promise by the Government to pay interest and capital as per the terms of that particular gilt, in return for an initial payment of capital by the purchaser. Gilts can be “fixed interest”, where the interest payments are level throughout the gilt’s term, or “index-linked” where the interest payments vary each year in line with a specified index (usually RPI). Gilts can be bought as assets by the Fund, but in funding as an objective measure of a risk-free rate of return.
Guarantee / guarantor	A formal promise by a third party (the guarantor) that it will meet any pension obligations not met by a specified employer. The presence of a guarantor will mean, for instance, that the Fund can consider the employer’s covenant to be as strong as its guarantor’s.
Letting employer	An employer which outsources or transfers a part of its services and workforce to another employer (usually a contractor). The contractor will pay towards the LGPS benefits accrued by the transferring members, but ultimately the obligation to pay for these benefits will revert to the letting employer. A letting employer will usually be a local authority, but can sometimes be another type of employer such as an Academy.

LGPS	The Local Government Pension Scheme, a public sector pension arrangement put in place via Government Regulations, for workers in local government. These Regulations also dictate eligibility (particularly for Scheduled Bodies), members' contribution rates, benefit calculations and certain governance requirements. The LGPS is divided into 100 Funds which map the UK. Each LGPS Fund is autonomous to the extent not dictated by Regulations, e.g. regarding investment strategy, employer contributions and choice of advisers.
Maturity	A general term to describe a Fund (or an employer's position within a Fund) where the members are closer to retirement (or more of them already retired) and the investment time horizon is shorter. This has implications for investment strategy and, consequently, funding strategy.
Members	The individuals who have built up (and may still be building up) entitlement in the Fund. They are divided into actives (current employee members), deferreds (ex-employees who have not yet retired) and pensioners (ex-employees who have now retired, and dependants of deceased ex-employees).
Primary contribution rate	The employer contribution rate required to pay for ongoing accrual of active members' benefits (including an allowance for administrative expenses). See Appendix D for further details.
Profile	The profile of an employer's membership or liability reflects various measurements of that employer's members , ie current and former employees. This includes: the proportions which are active, deferred or pensioner; the average ages of each category; the varying salary or pension levels; the lengths of service of active members vs their salary levels, etc. A membership (or liability) profile might be measured for its maturity also.
Rates and Adjustments Certificate	A formal document required by the LGPS Regulations, which must be updated at the conclusion of the formal valuation . This is completed by the actuary and confirms the contributions to be paid by each employer (or pool of employers) in the Fund for the period until the next valuation is completed.
Scheduled Bodies	Types of employer explicitly defined in the LGPS Regulations, whose employees must be offered membership of their local LGPS Fund. These include Councils, colleges, universities, academies, police and fire authorities etc, other than employees who have entitlement to a different public sector pension scheme (e.g. teachers, police and fire officers, university lecturers).
Secondary contribution rate	The difference between the employer's actual and Primary contribution rates . See Appendix D for further details.
Stabilisation	Any method used to smooth out changes in employer contributions from one year to the next. This is very broadly required by the LGPS Regulations, but in practice is particularly employed for large stable employers in the Fund.

Valuation

A risk management exercise to review the **Primary and Secondary contribution rates**, and other statutory information for a Fund, and usually individual employers too.

Investment Strategy Statement

INVESTMENT STRATEGY STATEMENT

INTRODUCTION

The Lincolnshire Pension Fund (“the Fund”), which is administered by Lincolnshire County Council (“the Administering Authority”), is required to maintain an Investment Strategy Statement (“ISS”) in accordance with Regulation 7 of the Local Government Pension Fund (Management and Investment of Funds) Regulations 2016.

The Administering Authority has delegated all its functions as administering authority to the Pensions Committee (“the Committee”). The ISS has been agreed by the Committee having taken advice from the Investment Consultant and Pension Fund Manager.

The ISS, which was last approved by the Committee on 21 March 2019, is subject to periodic review at least every three years and without delay after any significant change in investment policy. The Committee has consulted on the contents of the Fund’s investment strategy with such persons it considers appropriate.

The Fund is also required to maintain a Funding Strategy Statements (“FSS”) in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013 (as amended). The FSS, which was last approved by the Pensions Committee on 19th July 2018, complies with these Regulations.

INVESTMENT STRATEGY

The primary objective of the Lincolnshire Pension Fund is to provide pension benefits for members on their retirement and/or benefits on death, whether before or after retirement, and for their dependents.

The Committee aims to fund the benefits in such a manner that, in normal market conditions, all accrued benefits are fully covered by the value of the Fund's assets and that an appropriate level of contributions is agreed by the employers to meet the cost of future benefits accruing. For employee members, benefits will be based on service completed and final salary (pre 1 April 2014) and/or the accumulation of individual years built up through the career average pension scheme (post 1 April 2014) and will take account of future inflation increases. This funding position will be reviewed at each triennial actuarial valuation, or more frequently as required.

Investment Beliefs

These beliefs form the foundation of discussions, and assist decisions, regarding the structure of the Fund and the strategic asset allocation. In addition, they are used to ensure that new members on the Pensions Committee understand previous investment decisions taken.

Belief 1:

The Fund should take no more investment risk than is necessary to have a reasonable chance of achieving its objectives, and only where the Committee believes it will be rewarded over the longer term.

It is recognised that investment risk is needed in the Fund to generate the required returns, however this needs to be considered on an on-going basis to ensure it is appropriate (i.e. not too high or too low) given the Fund's objectives

Belief 2:

Funding and investment strategy are linked; as the funding position improves, the level of investment risk should be reduced.

As the Fund moves closer to full funding (i.e. 100% assets to meet liabilities on an appropriately prudent assumption of investment return) then it is expected that the level of risk will be adjusted accordingly.

Belief 3:

Investing in illiquid assets provides opportunities for enhancing returns, and investing in alternative asset classes helps to diversify the Fund structure.

The Committee accepts that by "locking away" funds for longer periods of time, the Fund should expect to be compensated for the lack of liquidity in the form of higher expected returns. However it is understood that this is not suitable for all the assets in the Fund. The Fund's investments should be diversified by combining assets with different risk, return and liquidity characteristics, whilst maintaining realistic expectations about the potential for sources of return to become correlated under market stress. The Committee believes an appropriate portion of the Fund should be invested in non-core asset classes, i.e. alternative assets, to provide diversification and reduce overall volatility of returns.

Belief 4:

Passive and active management both have roles to play in the Fund's structure; passive to deliver low cost asset class exposure and active to add potential value, understanding that active managers' success should be measured over a reasonable timeframe.

The Committee believes that active managers can add a return premium over investment markets, over the longer term, but accept that this has a cost. Therefore this is balanced with allocations to passive management to produce market returns at a very low cost.

Belief 5:

Environmental, social and governance (ESG) issues are important to the long term success of the Fund.

The Committee believes that it should act as a responsible owner across all of its investments and that ESG issues and considerations have a financial impact on the long term performance of the Fund. The Fund works with managers and other organisations to understand the potential impact of the risks and opportunities relating to ESG matters.

Belief 6:

Although fees and costs matter, it is the expected return net of all fees and costs that should be the Committee's focus, however transparency and understanding of costs is important.

The cost of accessing different asset classes and different management styles must be understood to ensure that the Fund is obtaining value for money, however the expected net return is the most important consideration when assessing investment opportunities and monitoring investment performance. The Fund expects its managers to have signed up to the Cost Transparency Code, and it also participates in fee benchmarking to assess the fees being paid relative to other pension schemes.

Investment of money in a wide variety of investments

It is the Pensions Committee’s policy to invest the assets of the Lincolnshire Pension Fund to spread the risk by ensuring a reasonable balance between different categories of investments. The Pensions Committee takes a long term approach to investment and invests in asset classes and individual investments that are expected to generate an attractive risk-adjusted return for the Pension Fund.

The Fund may invest in a wide range of investments including quoted and unquoted assets in Equities, Fixed Income, Property and Alternatives, either directly or through pooled investments. The Fund may also make use of derivatives, either directly or in pooled investments, for the purpose of efficient portfolio management or to hedge specific risks.

The Fund’s strategic asset allocation is set out below. The table also includes the ranges within which the asset allocation may vary without reference to the Pensions Committee, and the maximum percentage of total Fund value that can be invested in these asset classes. The asset allocation is consistent with the Committee’s views on the appropriate balance between generating a satisfactory long-term return on investments, whilst taking account of market risk and the nature of the Fund’s liabilities.

Asset class	Strategic allocation	Range	Maximum
Equity Assets	60%	+/- 6%	66%
UK equities	20%	+/- 2%	22%
Global equities	40%	+/- 5.5%	45.5%
Diversifying Growth Assets	26.5%	+/- 4.5%	31%
Alternatives	15%	+/- 1.5%	16.5%



Property	9%	+/- 1.5%	10.5%
Infrastructure	2.5%	+/- 1.5%	4%
Protection Assets	13.5%	+/- 2%	15.5%
Fixed Income	13.5%	+/- 1.5%	15%
Cash	0%	+/- 0.5%	0.5%

The asset allocation below reflects the changes approved by the Committee however these will be implemented as the Fund transitions its assets to Border to Coast.

Asset class	Strategic allocation	Range	Maximum
Equity Assets	55%*	+/- 7%	62%
UK equities	15%*	+/- 2%	17%
Global equities	40%	+/- 5%	45%
Diversifying Growth Assets	31.5%*	+/- 4.5%	36%
Diversified Alternatives (incl. infrastructure and multi asset credit)	21%*	+/- 3%	24%
Property	10.5%	+/- 1.5%	12%
Protection Assets	13.5%	+/- 2%	15.5%
Fixed Income	12.5%	+/- 1.5%	14%
Cash	1%	+/- 0.5%	1.5%

The Regulations do not permit more than 5% of the Fund's value to be invested in entities which are connected with that authority within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007(e). The investment policy of the Fund does not permit any employer-related investment, other than is necessary to meet the regulatory requirements with regards to pooling.

The Pensions Committee believes that the Fund's portfolio is adequately diversified, and has taken professional advice to this effect from their investment consultant and independent advisor.

The strategic asset allocation includes ranges for each asset class within which the asset allocation can vary. In the event that any asset class range is breached, the Pensions Committee will be informed and the Fund's officers will endeavour to bring the asset allocation back within the range within an appropriate period of time.

The Pensions Committee reviews the suitability of the asset allocation of the Fund on a quarterly basis, following advice from the officers, investment consultant and independent advisor.

It is intended that the Fund’s investment strategy will be reviewed at least every three years, following the latest actuarial valuation of the Fund. The investment strategy takes due account of the maturity profile of the Fund and the current funding position.

The Pensions Committee has set the following benchmark against which performance of the Fund will be measured:

Asset class	Benchmark
Equities	
UK Equities	FTSE All Share
Global Equities (ex UK)	MSCI World ex UK Index
Global Equities	MSCI All Countries World Index
Bonds	
UK Gilts Over 5 Years	FTSE UK Gilts Index-Linked Over 5 Years Index
Corporate Bonds	iBoxx £ Non-Gilts Index
All Stocks UK Gilt Index Fund	FTSE UK Gilts Index-Linked All Stocks Index
Corporate Bonds up to 5 Years	iBoxx Sterling Non-Gilts 1-5 Year Index
Property	
Property Venture	7% Per Annum
Property Unit Trusts	UK IPD Monthly Index
Infrastructure	6% Per Annum
Alternatives	LIBOR 3 Months + 4%

The suitability of particular investments and types of investments

The actuarial valuation, at 31 March 2019, was prepared on the basis of an expected investment return of 4% p.a., based on a 71% likelihood of that return being achieved over the next 20 years, and assuming inflation (CPI) to be 2.3%. The Pensions Committee has set the investment objective of producing a long term return of 0.75% p.a. above the strategic benchmark.

In order to monitor the investment objective, the Pensions Committee requires the provision of detailed performance measurement of the Fund's investments. This is provided by the Fund’s custodian on a quarterly basis. In addition, the Pensions Committee conducts a formal annual performance review of overall fund performance.

The approach to risk

The Committee is aware that the Fund has a need to take risk to help it achieve its funding objectives. It has an active risk management programme in place that aims to help it identify the risks being taken and put in place processes to manage, measure, monitor and (where possible) mitigate the risks being taken. One of the Committee's overarching beliefs is to only take as much investment risk as is necessary.

The principal risks affecting the Fund are set out below:

Risk	Description	Mitigants
Market	Value of an investment decreases as a result of changing market conditions.	Strategic asset allocation, with suitable diversification and appropriate ranges, determined on a triennial basis. The Committee has put in place rebalancing arrangements to ensure the Funds actual allocation does not deviate substantially from its target.
Performance	The Fund's investment managers fail to deliver returns in line with the underlying asset classes.	Analysis of market performance and investment managers' performance relative to their index benchmark on a quarterly basis. Investment Mangers present to the Committee on an annual basis.
Valuation	Valuations disclosed in the financial statements, particularly for unquoted investments, are not reflective of the value that could be achieved on disposal.	The valuation of investments is derived using a conservative valuation methodology and, where applicable, market observable data.
Liquidity	The Fund is not able to meet its financial obligations as they fall due or can do so only at an excessive cost.	The Fund maintains sufficient liquid funds at all times to ensure that it can meet its financial obligations.
Interest rate	A change in interest rates will result in a change in the valuation of the Fund's assets and liabilities.	The Fund regularly monitors its exposure to interest rates, and may consider hedging where appropriate.
Foreign exchange	An adverse movement in foreign exchange rates will impact on the value of the Fund's investments.	The Fund regularly monitors its foreign exchange exposure.
Demographic	Changes, such as increased longevity or ill-health retirement, will increase the	Demographic assumptions are conservative, regularly monitored, and reviewed on a

	value of the Fund’s liabilities.	triennial basis.
Regulatory	Changes to regulations and guidance may increase the cost of administering the Fund or increase the value of the Fund’s liabilities.	The Fund ensures that it is aware of any actual or potential changes to regulations and guidance and will participate in consultations where appropriate.
Governance	The administering authority is unaware of changes to the Fund’s membership which increases the value of its liabilities.	The Fund regularly monitors membership information and communicates with employers.

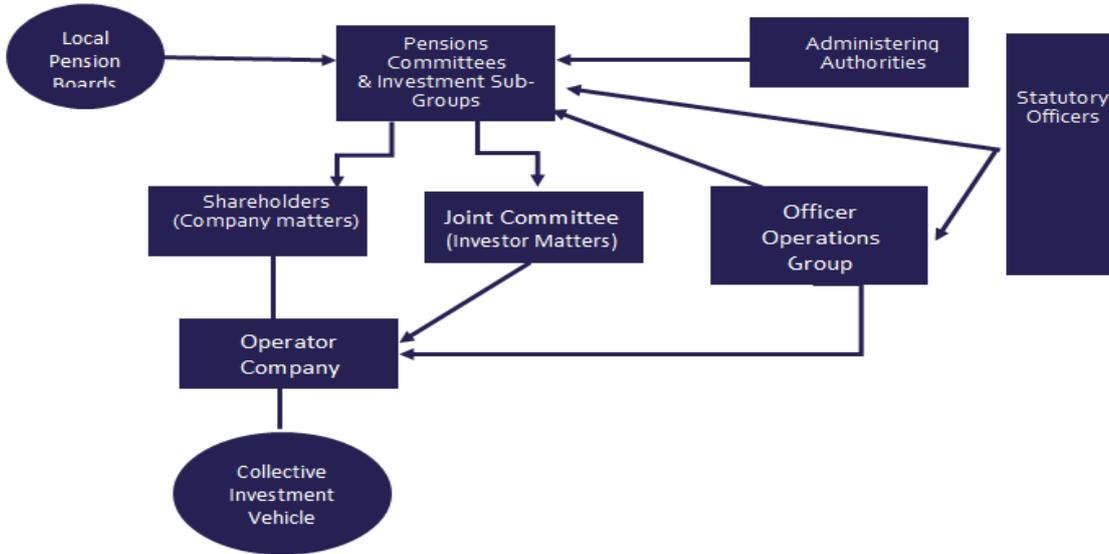
Approach to pooling investments

In order to satisfy the requirements of the “Local Government Pension Scheme: Investment Reform and Guidance” issued by the Department for Communities and Local Government (“DCLG”) in November 2015, the Pension Fund has elected to become a shareholder in Border to Coast Pensions Partnership Limited (Border to Coast). Border to Coast is a FCA-regulated Operator and Alternative Investment Fund Manager (“AIFM”).

Border to Coast is a partnership of the administering authorities of the following LGPS Funds:

- Bedfordshire Pension Fund
- Cumbria Pension Fund
- Durham Pension Fund
- East Riding Pension Fund
- Lincolnshire Pension Fund
- North Yorkshire Pension Fund
- Northumberland Pension Fund
- South Yorkshire Pension Fund
- Surrey Pension Fund
- Teesside Pension Fund
- Tyne and Wear Pension Fund
- Warwickshire Pension Fund

The governance structure of Border to Coast is as follows:



The Fund will hold Border to Coast to account through the following mechanisms:

- A representative on the Shareholder Board, with equal voting rights, who will provide oversight and control of the corporate operations of Border to Coast.
- A representative on the Joint Committee who will monitor and oversee the investment operations of Border to Coast.
- Officer support to the above representatives from the Officer Operations Group and the Statutory Officer Group.

The Pension Fund will retain the decision making powers regarding asset allocation and will delegate the investment management function to Border to Coast.

A significant proportion of the Fund’s investments will be made through Border to Coast. Where it is not practical or cost effective for assets to be transferred into the pool, they will continue to be managed at the Fund level. This is expected to predominantly include legacy unquoted investments such as limited partnerships. Whilst these assets may not to be transferred, once these investments mature the proceeds will be reinvested into Border to Coast sub-funds. At the current time it is estimated that c. 70% of the Fund’s assets will be invested in Border to Coast subject to it having suitable management arrangements in place.

The Fund will perform an annual review of assets that are determined to be held outside to ensure that it continues to demonstrate value for money. Following this review it will submit a report on the progress of asset transfers to the Scheme Advisory Board, in line with the guidance.

Approach to environmental, social and corporate governance (ESG) factors

The Fund considers itself to be a responsible investor and take ESG matters very seriously and monitors investment managers' approach to ESG.

Responsible Investment Beliefs

These beliefs form the foundation of discussions, and assist decisions, regarding the structure of the Fund and the strategic asset allocation. In addition, they are used to ensure that new members on the Pensions Committee understand previous investment decisions taken.

Belief 1:

Companies with a responsible ESG policy are expected to outperform companies without an ESG policy, over the longer term.

The Committee believes that companies that have well developed ESG policies will generally provide better long term performance than those companies that have not considered ESG factors in their business.

Belief 2:

The Committee considers that company engagement, rather than disinvestment, would be the better approach to fulfilling their responsible investment objectives. However, should a company not respond to engagement, disinvestment would be a consideration. Disinvestment on a whole sector basis is not within the Committee's beliefs.

Disinvestment is a blunt tool that is not believed to provide the best outcomes over the medium to long term. The Fund will, through its managers and other organisations, engage with companies to bring change, but will consider company disinvestment if engagement fails.

Belief 3:

Climate change and the expected transition to a low carbon economy is a long term financial risk to Fund outcomes.

The Committee believes that climate change risk and the transition to a low carbon economy should be factored into asset allocation decisions and also investment decisions by managers to reduce the long term financial risk, but also to take advantage of the opportunities that may be available.

Belief 4:

The Committee should focus on meeting its financial obligations to pay benefits to members. Financial considerations should therefore carry more weight than non-financial considerations.

The main objective of the Pension Fund is to ensure that it is able to pay benefits to its members as and when they fall due. Therefore financial considerations will be at the forefront of any investment or asset allocation decisions.

Belief 5:

The Fund's active investment managers should embed the consideration of ESG factors into their investment process and decision making.

The Committee believes that the consideration of ESG factors when making investment decisions should not be an add-on but should be embedded into the whole investment selection process. Any active managers appointed by the Fund will be expected to evidence this.

Belief 6:

The Fund should collaborate with other investors if it could have a positive impact, and also engage with them and investment managers to better understand ESG risks.

The Committee believes that the Fund has a stronger voice when working with others, be it Border to Coast Pensions Partnership, Local Authority Pension Fund Forum (LAPFF) or any other organisations. The Fund will work with them and the investment managers to ensure that it understands the ESG risks and how best to address them.

It is considered that the Pensions Committee represents the views of the Fund membership and, in addition, the views of the Local Pension Board are taken into account as part of their review of this document.

The exercise of rights attaching to investments (including voting rights)

The Fund has published its Responsible Investment Policy and Voting Guidelines on the shared website at www.wypf.org.uk.

Lincolnshire Pension Fund is fully committed to responsible investment (RI) to improve the long term value for shareholders. The Fund believes that well governed companies produce better and more sustainable returns than poorly governed companies. The Fund also believe that asset owners, either directly (where resources allow) or through their external managers and membership of collaborative shareholder engagement groups (such as LAPFF), could influence the Board/Directors of underperforming companies to improve the management and financial performance of those companies.

As global investors, the Fund expects the principles of good stewardship to apply globally, whilst recognising the need for local market considerations in its application. Reflecting on this the Fund has summarised its compliance with the UK Stewardship code (and principles relating to good stewardship below.

Principle 1 – Institutional investors should publicly disclose their policy on how they will discharge their stewardship responsibilities.

The Lincolnshire Pension Fund takes its responsibilities as a shareholder seriously, and has a Responsible Investment Policy that is aligned with our asset pool, Border to Coast. This can be found on the Pension Fund's shared website at http://www.wypf.org.uk/Member/Publications/PolicyStatements/Lincolnshire/PolicyStatements_Lincoln_Index.aspx. It seeks to adhere to the Stewardship Code where possible, and expects its appointed asset managers to do so too. Resources do not currently allow for a dedicated role to oversee LPF's RI responsibilities at a Fund level, however the asset pooling arrangements currently being implemented will enable a more active role in the future.

In practice the Fund applies the Code in two ways; through arrangements with its asset managers and through membership of the Local Authority Pension Fund Forum, a collaborative shareholder engagement group for Local Authority Pension Funds. Through these channels, LPF seeks to improve long term share performance through investment in better governed companies, therefore improving the funding level of the LPF and reducing the cost to stakeholders in the Local Government Pension Scheme.

As part of the manager appointment process, the Fund selects managers who show how their stewardship responsibilities are built in as an integral part of their investment process. Managers are asked to include information on stewardship and engagement activity in their quarterly reports to LPF, so that activity can be monitored. The Fund has regular meetings with its external managers where their stewardship activities are on the agenda. This assists the Fund in understanding the impact of any such activities undertaken and ensures that they are aligned with the engagement work done by LAPFF.

The Fund reports quarterly to the Pensions Committee on the engagement work undertaken by LAPFF and an officer regularly attends the LAPFF meetings. The Fund also attends the LAPFF Annual Conference to ensure a full understanding and input into the work programme of LAPFF.

Voting is carried out at by the external fund managers, who are expected to vote in line with best practice. Managers report detail of voting undertaken quarterly to officers, and the Fund reports quarterly to the Pensions Committee in summary on all voting activity undertaken.

Principle 2 - Institutional investors should have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed.

The Fund expects the asset managers it employs to have effective policies addressing potential conflicts of interest, and that these are all publically available on their respective websites. These are discussed prior to the appointment of a manager, and reviewed as part of the standard manager monitoring process.

In respect of conflicts of interest within the Fund, Pensions Committee and the Pension Board review the Pension Fund Code of Conduct and Conflicts of Interest Policy annually and all members are required to sign an annual declaration form in line with the published policy. The policy can be found on the shared LPF website at www.wypf.org.uk. In addition, Committee members are required to make declarations of interest prior to committee meetings which are documented in the minutes of each meeting and available on the Council's website at www.lincolnshire.gov.uk.

Principle 3 - Institutional investors should monitor their investee companies.

As investors we own a portion of the companies we invest in. With working through our external managers and LAPFF we can use our rights as owners to encourage companies to act more responsibly and improve their practices. All our managers are required to consider how environmental, social and governance factors might impact companies sustainability, and therefore their long term share performance.

Day-to-day responsibility for managing our externally managed equity holdings is delegated to our appointed asset managers, and the Fund expects them to monitor their investee companies and engage where necessary. Managers are asked to include information on stewardship and engagement activity in their quarterly reports to LPF, so that activity and impact can be monitored. The Fund has regular meetings with its external managers where their stewardship activities are on the agenda. This assists the Fund in understanding the impact and effectiveness of any such activities undertaken and ensures that they are aligned with the engagement work done by LAPFF. Reports on the Funds voting and engagement activity through LAPFF are received by the Pensions Committee on a quarterly basis.

Resources do not currently allow for a dedicated role to monitor investee companies at a Fund level, however the asset pooling arrangements currently being implemented will enable a more active role in the future.

Principle 4 - Institutional investors should establish clear guidelines on when and how they will escalate their activities.

As highlighted above, responsibility for day-to-day interaction with companies is delegated to the Fund's asset managers, including the escalation of engagement when necessary. Their guidelines for such activities are expected to be disclosed in their own statement of adherence to the Stewardship Code. We review each manager's policy on engagement and escalation prior to appointment and we review their engagement activity during regular review meetings with them, and support it when required. Escalation routes across our managers involve meetings with company management, meetings with Non-Executive Directors, collaborating with other institutional shareholders, submitting resolutions at general meetings and in the most extreme instances divestment of shares. The outcome of any engagement is reported to the Fund through the normal reporting routine.

On occasion, the Fund may itself choose to escalate activity through its participation in the Local Authority Pension Fund Forum. The areas where escalation might occur would be aligned with the LAPFF work programme. Fund involvement would be by either co-signing a shareholder resolution or publically supporting a shareholder resolution. This would happen following a request from LAPFF explaining the engagement activity taken so far and the reasons why a shareholder resolution is required. The Fund had an agreed process for this internally which requires a paper taken to our Pensions Committee (time allowing) or through delegation to the Council's Executive Director of Finance and Public Protection in consultation with the Chair and Vice Chair of the Pensions Committee to agree. Examples of escalation activity from LAPFF that the Fund has supported are shown below:

- Supporting the Human Rights Capital shareholder resolution at Sports Direct
- Part of the 'Aiming for A' investor coalition – successfully co-filing at BP, Shell, Anglo American, Rio Tinto and Glencore on strategic resilience resolutions
- Supported shareholder resolutions at National Express on workplace rights

The Fund monitors and participates in shareholder litigation through its contracts with IPS (Institutional Protection Services) and US law firm Labaton Sucharow. In addition, supplementary monitoring is provided by BLBG.

Principle 5 - Institutional investors should be willing to act collectively with other investors where appropriate.

The Fund seeks to work collaboratively with other institutional shareholders in order to maximise the influence that it can have on individual companies. The Fund achieves this through membership of the Local Authority Pension Fund Forum, which engages with companies over environmental, social and governance issues on behalf of its members. The LAPFF agree planned work programmes each year which are discussed and approved at LAPFF meetings. This plan sets out the engagement areas for activity for the coming year. Lincolnshire Pensions Team Accounting, Investment and Governance Manager Claire Machej is the named representative responsible for attending these meetings and actively participates in any discussions and setting of the work programme. She raises any concerns that the Fund may have and feeds back to the Pensions Committee on a quarterly basis.

The asset pooling arrangements with Border to Coast currently being implemented will enable additional collaborative working.

The contact for any potential collective action with the Fund is the Pension Fund Manager, Jo Ray, at jo.ray@lincolnshire.gov.uk.

Principle 6 - Institutional investors should have a clear policy on voting and disclosure of voting activity.

Responsibility for the exercise of voting rights is delegated to the Fund’s appointed asset managers. The Fund has a Corporate Governance Voting Guidelines and Voting Guidelines policy that can be found on the Pension Fund's shared website at http://www.wypf.org.uk/Member/Publications/PolicyStatements/Lincolnshire/PolicyStatements_Lincoln_Index.aspx. This is aligned to the Border to Coast policy.

The quarterly reports presented to the Pensions Committee include high level voting activity and are available on the Council’s website, alongside all committee reports.

The Fund participates in stock lending through its Custodian. Stock is not recalled ahead of company meetings to allow voting on the holdings participating in the stock lending programme, due to the restricted resources within the internal team.

Principle 7 - Institutional investors should report periodically on their stewardship and

voting activities.

The Fund reports quarterly to the Pensions Committee on stewardship activity through a specific section on voting undertaken each quarter, in the Fund Update. This includes details of engagement activity undertaken through the Local Authority Pension Fund Forum. On an annual basis the Fund includes a section on Stewardship Responsibilities in its Annual Report and Accounts, detailing voting activity and highlighting the key engagements over the year through its membership of LAPFF. These are available on the Council's website.

Data to produce these reports is taken from the Fund's external managers, and from reports produced by LAPFF.

Compliance and monitoring

The investment managers are required to adhere to the principles set out in this Investment Strategy Statement. The Pensions Committee will require an annual written statement from the investment managers that they have adhered to the principles set out in this statement.

The Investment Strategy Statement of the Lincolnshire Pension Fund will be reviewed by the Pensions Committee at least every 3 years and more regularly if considered appropriate or amendments are required.

Communication Policy Statement

COMMUNICATION POLICY STATEMENT

Lincolnshire County Council, as administering authority for the Local Government Pension Scheme, is required by statute to publish a communications policy statement. The Fund communicates with over 240 employers and over 75,000 scheme members, in addition to a large number of other interested parties.

The Regulations governing the Local Government Pension Scheme are laid before parliament by the Ministry of Housing, Communities and Local Government. One of the key requirements they make on all Administering Authorities is to prepare, maintain and publish a written statement setting out the information below:-

- a) The Fund must now prepare, maintain and publish a written statement setting out its policy concerning communications with:
 - members;
 - representatives of members;
 - prospective members; and
 - employing authorities.

- b) In particular, the statement must set out the Fund's policy on:
 - i. the provision of information and publicity about the Scheme to members, representatives of members and employing authorities (including non-Scheme Employers);
 - ii. the format, frequency and method of distributing such information or publicity; and
 - iii. the promotion of the Scheme to prospective members and their employing authorities.

The day-to-day administration of the Local Government Pension Scheme is carried out on behalf of the County Council by West Yorkshire Pension Fund (WYPF), in a shared service arrangement. Communication material is produced by WYPF in collaboration with the Pensions Team in Lincolnshire. All arrangements for forums, workshops and meetings covered within this statement are made in partnership with WYPF.

The Fund communicates with all stakeholders, as defined in specific legislation, and listed above.

Communication is increasingly distributed via electronic means, with all documents available on a dedicated Pensions website (www.wypf.org.uk).

WYPF provide a dedicated enquiry phone numbers and emails for both scheme members and employers for pension related enquiries. For scheme members it is 01274 434999 and pensions@wypf.org.uk, and for employers it is 01274 434900 and wypf.pfr@wypf.org.uk.

The appropriately qualified staff from the County Council, WYPF or external advisers will deliver presentations to groups of stakeholders and conduct individual meetings.

The Fund’s objective in respect of communication is to comply with relevant legislation and ensure relevant individuals and employers receive accurate and timely information about their pension arrangements. Methods of communication are set out in the table below.

Communications events - Scheme Members

Communication	Format	Frequency	Method of Distribution
LGPS active members (including representatives of retired members)	Newsletter	2 per year	Mail
	www.wypf.org.uk	Constant	Web
	Contact centre - Bradford	8.45 to 4.30 Monday to Friday	Telephone E-mail Face to face
	County Offices, Lincoln	8.00 to 5.00 Monday to Friday	Face to face
	Social media	Constant	Web
	Annual benefit statement	1 per year	Mail
	Roadshows	Quarterly	Face to face
	Mid-Life course	Monthly under trial	Face to face
	Pre-retirement course	Monthly	Face to face
LGPS deferred members (including representatives of deferred members)	www.wypf.org.uk	Constant	Web
	Contact Centre - Bradford	8.45 to 4.30 Monday to Friday	Telephone E-mail Face to face
	County Offices, Lincoln	8.00 to 5.00 Monday to Friday	Face to face
	Social media	Constant	Web
	Newsletter	1 per year	Mail
LGPS pensioner members (including representatives of retired members)	www.wypf.org.uk	Constant	Web
	Contact centre - Bradford	8.45 to 4.30 Monday to Friday	Face to face Telephone E-mail
	County Offices,	8.00 to 5.00	Face to face



Lincoln	Monday to Friday	
Pension advice slips	As and when net pension varies by 25p or more	Mail
P60	1 per year	Mail
Social media	Constant	Web
Newsletter	1 per year	Mail

Communications events - Employers

Communication	Format	Frequency	Method of Distribution
Employers	Pension Fund Representatives	8.30 to 4.30 Monday to Friday	Face to face Telephone E-mail
	Website	Constant	Web
	Fact card	1 per year	Mail
	Fact sheets	Constant	Web
	Employer guide	Constant	Web/electronic document
	Ad hoc training	As and when required	Face to face
	Update sessions	2 per year	Meeting
	Annual meeting	1 per year	Meeting
	Manuals/toolkits	Constant	Web/electronic document
	Social media	Constant	Web
	Workshops	5 per year	Face to face
	Introduction to Pensions	Bi-monthly	Face to face
	Training webinars	Constant	Web
Online training video	Constant	Web	

Governance Policy and Compliance Statement

Lincolnshire County Council, as administering authority (and Scheme Manager) for the Local Government Pension Scheme, is required by statute to publish a governance compliance statement. The Council has elected to do this by publishing a concise Governance Policy Statement and then to outline, as required by legislation, the extent to which that statement and the underlying practices demonstrate compliance with best practice guidance as published by the Department for Communities and Local Government. This latter aspect constitutes the Governance Compliance Statement.

The Governance Policy and Compliance Statements are set out in turn below.

GOVERNANCE POLICY STATEMENT

The County Council has delegated its pension fund administering authority functions to a Pensions Committee and the Executive Director of Finance and Public Protection. The Public Service Pensions Act (2013) required all administering authorities to introduce a local Pension Board to assist the Scheme Manager.

Pensions Committee

The Pensions Committee has 11 members in total, 8 of which are County Councillors and 3 co-opted members. All the members have full voting rights.

The 8 County Councillors represent the political balance of the Council.

The 3 co-opted members comprise:

- 1 representative from the other local authorities within the County,
- 1 representative for non Local Authority employers, and
- 1 Trade Union representative, reflecting the interests of scheme members.

Under the County Council's Constitution, the Pensions Committee exercises the following functions, to;

- Drawing upon appropriate professional advice, to set investment policies for the Fund, including the establishment and maintenance of a strategic benchmark for asset allocation, and approval of the Investment Strategy Statement.
- To review the performance of Border to Coast Pensions Partnership Limited and its sub-funds, legacy fund managers and associated professional service providers.

- To approve the annual Report and Statement of accounts of the fund.
- To consider any other matters relevant to the operation and management of the fund.
- As necessary and appropriate issue instructions to the Council's representative as shareholder of Border to Coast Pensions Partnership Limited on matters affecting the exercise of the Council's rights as shareholder in the company.
- To respond to any relevant consultations impacting upon the benefit provisions of the Local Government Pension Scheme.

In fulfilling its functions the Committee shall have regard to the advice of the Lincolnshire Local Pension Board established in accordance with the Local Government Pension Scheme (Amendment) (Governance) Regulations 2015 and shall receive and consider recommendations from the Border to Coast Pensions Partnership Joint Committee.

The Pensions Committee has four regular meetings, two manager monitoring meetings and two training meetings each year. In addition, one or more special meetings may be held to appoint new investment managers or other professional advisers.

The Pensions Committee's regular quarterly meetings are open to the public and agendas, reports and minutes are made available through the County Council's website. An annual report on the management of the fund is provided to all scheme employers with an abbreviated version distributed to scheme members.

Executive Director - Resources

The Executive Director - Resources is responsible for the day-to-day administration of the benefits and assets of the pension scheme, specifically to:

- authorise payment of statutory pensions and allowances,
- undertake or arrange for all necessary transactions associated with the management of the assets of the Pension Fund, and
- agree appropriate means of securing external representation on the Pensions Committee, in consultation with relevant external bodies.

Lincolnshire Pension Board



The Lincolnshire Pension Board will ensure the Scheme Manager effectively and efficiently complies with the Code of Practice on the governance and administration of public service pension schemes issued by the Pensions Regulator. The Board will also ensure that it complies with the knowledge and understanding requirements in the Pensions Regulator's Code of Practice.

In addition to the local structure, the Lincolnshire Pension Board is accountable to the Pensions Regulator and the National Scheme Advisory Board.

The Pensions Regulator will also be a point of escalation for whistle blowing or similar issues (supplementary to the whistle blowing policy and anti-fraud and corruption policy operated by the administering authority, which operate to include all of the functions of the Council and its advisers).

The role of the Lincolnshire Pension Board is set out below:

- Assist Lincolnshire County Council as Scheme Manager;
- To secure compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that is connected with it;
- To secure compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator; and
- In such other matters as the scheme regulations may specify.

The terms of reference for the Board are available on the Funds shared website with WYPF at www.wypf.org.uk.

The Lincolnshire Pension Board consists of five members:

- two employer representatives (to represent all employers within the Scheme)
- two scheme members representatives (to represent all members of the Scheme (active, deferred and pensioner))
- an independent member (to act as Chairman)

The employer and scheme member representatives can vote. The Independent Chairman cannot vote.

The Lincolnshire Pension Board has a minimum of four meetings each year. In addition, Board members must attend regular training events.

The Lincolnshire Pension Board meetings are open to the public and agendas, reports and minutes are made available through the Fund's shared website with WYPF at www.wypf.org.uk. An annual report on the work of the Board is included in the Fund's annual report, which is published on the Council's website and provided

to all scheme employers with an abbreviated version distributed to scheme members.

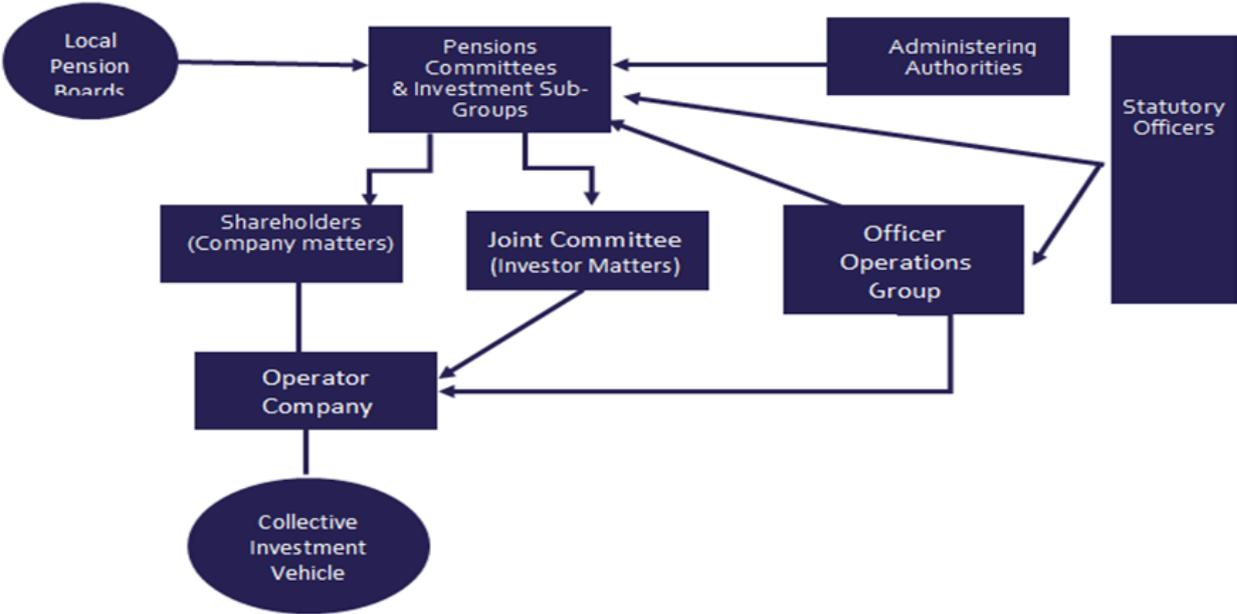
Any complaint or allegation of breach of due process brought to the attention of the Lincolnshire Pension Board shall be dealt with in accordance with the Code of Practice as published by the Pensions Regulator.

Any questions about the governance of the Lincolnshire Local Government Pension Fund should be addressed to Jo Ray, Head of Pensions (email: jo.ray@lincolnshire.gov.uk or telephone 01522 553656).

Asset Pooling Governance

In response to the change in regulations, LGPS Funds have to pool the investment of their assets. Lincolnshire Pension Fund is a Partner Fund in the Border to Coast Pensions Partnership Limited (Border to Coast), one of the eight asset pools created.

The diagram below shows the governance structure for Border to Coast.



The Fund will hold Border to Coast to account through the following mechanisms:

- A representative on the Shareholder Board, with equal voting rights, who will provide oversight and control of the corporate operations of Border to Coast (LCC S151 Officer).
- A representative on the Joint Committee who will monitor and oversee the investment operations of Border to Coast (Pensions Committee Chairman).
- Officer support to the above representatives from the Officer Operations Group and the Statutory Officer Group (Head of Pensions).

The Pension Fund will retain the decision making powers regarding asset allocation and will delegate the investment management function to Border to Coast.

GOVERNANCE COMPLIANCE STATEMENT

Principle		Full Compliance	Comments
A - Structure	a. The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Yes	See terms of reference for the Pensions Committee in the Policy Statement above.
	b. That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Partial	The Council has not, to date, seen the need to establish a secondary committee/panel. It will, however, keep this aspect under review and does establish working groups from the Committee to deal with specific issues. Pensioner and deferred beneficiaries are not presently represented directly on the Committee – see B a. below.
	c. That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	Not Relevant	As discussed above, no such forum has been established as yet.
	d. That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.	Not Relevant	As discussed above, no such forum has been established as yet.

<p>B - Representation</p>	<p>a. That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include :-</p> <ul style="list-style-type: none"> • Employing authorities (including non-scheme employers, e.g. admitted bodies); • Scheme members (including deferred and pensioner scheme members), • Where appropriate, Independent professional observers, and • Expert advisors (on an ad hoc basis) 	<p>Partial</p>	<p>The Committee has 11 members, all with voting rights, of which 8 are County Council Councillors. Other members include one representing other local authorities (district councils) and one representing small scheduled bodies, currently from an Internal Drainage Board. Member related issues are dealt with by having a trade union representative on the Committee. Given the statutory guarantee that exists in respect of member benefits, this is felt to be sufficient representation. The Council will review this aspect periodically. The Committee have appointed an independent investment advisor who attends all Committees.</p>
	<p>b. That where lay members sit on the main or secondary committee, they are treated equally in terms of access to papers, meetings and training and are given full opportunity to contribute to the decision making process, with or without voting rights.</p>	<p>Yes</p>	<p>All members of the Committee have full voting rights and equal access to information, training, etc.</p>
<p>C – Selection and Role of Lay Members</p>	<p>a. That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.</p>	<p>Yes</p>	<p>Nationally customised training is available to all members and this is supplemented by locally provided induction sessions for new members of the Committee. In addition, the Committee agrees an annual training plan with specific topics covered</p>

			on set dates.
	b. That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.	Yes	The declaration of member's interests is a standard item on the agenda of the Pensions Committee.
D - Voting	a. That the policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Yes	Full voting rights are given to all members of the Committee.
E - Training/Facility Time/Expenses	a. That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.	Yes	See C a. above. All expenses incurred by members of the Pensions Committee are either met by the body they represent or directly by the Fund itself.
	b. That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.	Yes	All members are treated equally in every respect.

	c. That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.	Yes	The Committee agrees an annual training plan with specific topics covered on set dates. All training undertaken by members of the Pensions Committee is recorded and additional training opportunities are regularly brought to the attention of the Committee, either in monthly update letters or in reports taken to Committee.
F – Meetings - Frequency	a. That an administering authority’s main committee meet at least quarterly.	Yes	See Compliance Policy Statement above.
	b. That an administering authority’s secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.	Not Relevant	As discussed above, no such forum has been established as yet.
	c. That an administering authority who does not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	Not Relevant	Three added members exist and have equal rights with all mainstream members in all respects.
G – Access	a. That, subject to any rules in the council’s constitution, all members of main and secondary committees or panels have equal access to	Yes	All members are treated equally in every respect.

	committee papers, documents and advice that falls to be considered at meetings of the main committee.		
H – Scope	a. That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Partial	The terms of reference of the Pensions Committee were changed a few years ago to include benefit related matters which up until that time had been dealt with elsewhere within the governance arrangements of the Council. A report on the administration of the scheme is taken to each quarterly committee meeting. At present the Council does not believe there is a strong argument in favour of appointing an independent professional observer on administration/governance issues in addition to the independent advisor already in place in respect of investment matters.
I - Publicity	a. That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.	Yes	The County Council publishes the many governance documents and communicates regularly with employers and scheme members.

Pensions Administration Strategy

Contents

1. Regulatory framework and purpose
2. Review of the strategy
3. Liaison and communication
4. Employer duties and responsibilities
5. Payments and charges
6. Administering authority duties and responsibilities
7. Unsatisfactory performance
8. Appendices
 - a. Authorised contacts form
 - b. Schedule of charges
 - c. Charging levels

1. Regulatory framework and purpose

The Regulations

This strategy is made under Regulation 59 of The Local Government Pension Scheme Regulations (LGPS) 2013.

In line with these regulations Lincolnshire Pension Fund (LPF), West Yorkshire Pension Fund (WYPF) and Hounslow Pension Fund (HPF) employers have been consulted on the strategy, and a copy has been sent to the secretary of state.

Purpose

This strategy covers all three Funds within the shared service, being Lincolnshire Pension Fund West Yorkshire Pension Fund and Hounslow Pension Fund, administered under a collaboration agreement. Within this document the shared service administration (based in Bradford with a satellite office in Lincoln), will be referred to as ‘the administrator’.

This strategy outlines the processes and procedures to allow LPF, WYPF, HPF and employers to work together in a cost- effective way to administer the LGPS whilst maintaining an excellent level of service to members. It recognises that working co-operatively and collaboratively will be key to achieving these aims.

2. Review of the strategy

This strategy will be reviewed as soon as reasonably possible following any changes to the regulations, processes or procedures that affect the strategy or on a triennial basis if this occurs sooner.

Changes to this strategy will be made following consultation with employers and a copy of the updated strategy will be sent to the secretary of state.

The administrator will constantly seek to improve communications between itself and the employers.

Employers are welcome to discuss any aspect of this strategy with the administrator at any time and may make suggestions for improvement to the strategy.

3. Liaison and communication

Authorised contacts for employers

Each employer will nominate a contact to administer the three main areas of the LGPS:

- a strategic contact for valuation, scheme consultation, discretionary statements and IDRPs;
- an administration contact for the day-to-day administration of the scheme, completing forms and responding to queries; and

- a finance contact for completion and submission of monthly postings and co-ordination of exception reports.

If they wish, employers may also nominate additional contacts by completing an authorised user list. If a third-party organisation provides service for the employer they too can be added as an authorised contact.

All contacts will receive a login name and password that allows them to access the Civica employer portal for online administration and the combined remittance and monthly return.

When registering, each contact should complete a **Main contact registration** form and **Authorised user list** form, and sign the administrator’s user agreement for the secure administration facility.

The three main contacts are responsible for ensuring that contacts are maintained by notifying the administrator when one leaves and registering new contacts where necessary.

Liaison and communication with employers

The administrator will provide the following contact information for employers and their members:

- a named Pension Fund Representative for regulatory or administration queries, training, advice and guidance;
- a named Finance Business Partner to assist with the monthly returns process; and
- a dedicated contact centre for member queries.

In addition to this, the administrator takes a multi-channel approach to communication with its employers.

Format of communication	Frequency	Method of distribution
Pension Fund Representatives	8.30am to 4.30pm Monday to Friday	Face-to-face/telephone/e-mail
Website	Constant	Web
Fact card	1 per year	Mail
Fact sheets	Constant	Web
Employer guide	Constant	Web/electronic document
<i>Ad hoc</i> training	As and when required	Face-to-face
Update sessions	2 per year	Meeting
Annual meeting	1 per year	Meeting
Manuals/toolkits	Constant	Web/electronic document
<i>Pension Matters</i> and <i>round-up</i>	12 per year and as and when required	Wordpress blog and e-mail
Social media	Constant	Web
<i>Ad hoc</i> meetings	As and when required	Face-to-face
Workshops	10 per year	Face-to-face
Bite size workshops	2 per month on a trial basis	Cloud hosted live webinar

4. Employer duties and responsibilities

When carrying out their functions, employers must have regard to the current version of this strategy.

Events for notification

Event	Preferred method of notification	Other methods	Target	Acceptable performance
Monthly postings (submitted via secure portal)	Approved spreadsheet	None	19 th day of the month following the month in which contributions were deducted.	100% compliance of returns received in target
New starters	Monthly return	None	Notified via the monthly return, the administrator will process the data within 2 weeks following monthly return submission.	90% compliance or better
Change of hours, name, payroll number or job title	Monthly return (exception report)	Web form	Notified via monthly returns, the administrator will process the data within 2 weeks following monthly return submission. For exception report output from the monthly return, change data response must be provided to the administrator within 2 weeks of receipt of the exception report. If the employer is not using monthly return, then information is due within 6 weeks of change event.	90% compliance or better
50/50 & main scheme elections	Monthly return	None	Notified by the employer via monthly return, the administrator will process the data within 2 weeks following monthly data submission.	90% compliance or better
Service breaks/absence	Web form	None	Within 6 weeks of the date of the absence commencing.	90% compliance or better

Under 3 months opt-outs	Monthly return	None	Notified by the employer via monthly return, the administrator will process the data within 2 weeks following monthly data submission.	90% compliance or better
Leavers	Monthly return Web form Exception reports	None	Notified by the employer via monthly return, the administrator will process the data within 2 weeks following monthly data submission, else within 6 weeks of leaving. For exception reports leaver forms must be provided within 2 months of receipt of the exception report.	90% compliance or better
Retirement notifications	Web form	None	10 days before the member is due to retire unless the reason for retirement is ill health or redundancy.	90% compliance or better
Death in service notification	Web form	None	Within 3 days of the date of notification.	100% compliance

Responsibilities

Employers are responsible for ensuring that member and employer contributions are deducted at the correct rate, including any additional contributions. Organisations with third-party providers **cannot** delegate responsibility for this even if day- to-day tasks are carried out by that provider.

The administrator is not responsible for verifying the accuracy of any information provided by the employer for the purpose of calculating benefits under the provisions of the Local Government Pension Scheme. That responsibility rests with the employer.

Any over-payment as a result of inaccurate information being supplied by the employer shall be recovered from that employer.

In the event of the administrator being fined by The Pensions Regulator, this fine will be passed on to the relevant employer where that employer’s actions or inaction caused the fine.

Discretionary powers

The employer is responsible for exercising the discretionary powers given to employers by the regulations. The employer is also responsible for compiling, reviewing and publishing its policy to employees in respect of the key discretions as required by the regulations.

Member contribution bands

Employers are responsible for assessing and reassessing the contribution band that is allocated to a member. The employer must also inform the member of the band that they have been allocated on joining the scheme and when they have been reallocated to a different band.

Internal dispute resolution procedure (IDRP)

Employers must nominate an adjudicator to deal with appeals at stage one of the IDRP where the dispute is against a decision the employer has made or is responsible for making. Employers are responsible for providing details of the IDRP and the adjudicator in writing to members when informing them of decisions they have made.

5. Payments and charges

Payments by employing authorities

Employing authorities will make all payments required under the LGPS regulations, and any related legislations, promptly to LPF and /or its Additional voluntary contribution (AVC) provider (Prudential) as appropriate. If any fees, such as actuarial or legal fees, are incurred by LPF in relation to employer-specific work, they will be recharged to the employer requiring/requesting this work.

Paying contributions

Member and employer contributions can be paid over at any time and should be accompanied by a monthly postings submission. The latest date contributions can be paid is the 19th day of the month following the month in which the deductions were made. The monthly posting submission should be uploaded to the administrator by the same deadline and the data should reconcile to the payment made.

Where the 19th falls on a weekend or bank holiday, the due date becomes the last working day prior to the 19th.

AVC deductions

Employers will pay AVCs to the relevant provider within one week of them being deducted.

Late payment

The employer may be reported to The Pensions Regulator where contributions are received late, in accordance with the regulator’s code of practice. If a matching monthly posting

submission is not provided with a contribution payment by the deadline this will also be recorded as a late payment, because the fund will not be able to correctly allocate the payment received.

Payment method

Contributions (but not AVC's) should be paid to the administrator by BACS payment direct to the LPF bank account.

Early retirement and augmentation costs

Employers should pay the full early retirement cost (pension strain) and any augmentation costs in one instalment

Interest on late payment

In accordance with the LGPS regulations, interest will be charged on any amount overdue from an employing authority by more than one month.

Employer contributions

Employers' contributions rates are not fixed and employers are required to pay whatever is necessary to ensure that the portion of the fund relating to their organisation is sufficient to meet its liabilities.

Actuarial valuation

An actuarial valuation of the fund is undertaken every three years by the fund actuary. The actuary balances the fund's assets and liabilities in respect of each employer and assesses the appropriate contribution rate and secondary payment, if appropriate, for each employer for the subsequent three years.

Administration charges

The cost of running the administrator is charged directly to the fund; the actuary takes these costs into account in assessing employers' contribution rates.

Administering authority duties and responsibilities

When carrying out their functions the administrator will have regard to the current version of the strategy.

6. Scheme administration

The administrator will ensure that workshops and annual meetings are held on a regular basis and actively seek to promote the Local Government Pension Scheme via the following events:

- Employer annual meeting;
- Pre-retirement courses;

- New starters induction courses;
- Complete guide to administration workshops;
- Your responsibilities workshops;
- Monthly contributions workshops;
- Ill Health retirement workshops;
- Pensionable pay workshop; and
- Bite size training webinars.

Responsibilities

The administrator will ensure the following functions are carried out:

- Provide a helpdesk facility for enquiries, available during normal office hours, providing a single point of access for information relating to the scheme;
- Create a member record for all new starters admitted to the scheme;
- Collect and reconcile employer and employee contributions;
- Maintain and update members' records for any changes received by the administrator;
- At each actuarial valuation, the administrator will forward the required data in respect of each member and provide statistical information over the valuation period to the fund actuary so that they can determine the assets and liabilities for each employer;
- Support LPF to communicate the results of the actuarial valuation of the fund to each employer;
- Provide every active, deferred and pension credit member with a benefit statement each year;
- Provide estimate of retirement benefits on request by the employer;
- Calculate and pay retirement benefits, deferred benefits and death in service benefits in accordance with LGPS rules, members' options and statutory limits; and
- Comply with HMRC legislation.

Decisions

The administrator will ensure that members are notified of any decisions made under the scheme regulations in relation to their benefits within 10 working days of the decision being made and will ensure the member is informed of their right of appeal.

Discretionary powers

The administrator will ensure the appropriate policies are formulated, reviewed and publicised in accordance with the scheme regulations.

Internal dispute resolution procedure (IDRP)

The administrator will deal with employer appeals at stage two of the IDRP.

The administrator will nominate an adjudicator to deal with appeals at stage one and stage two of the IDRP where the appeal is against a decision the administrator has made or is responsible for making.

Fund performance levels

The minimum performance targets are shown below.

Service	Days	Minimum target
1. New member records created	10	85%
2. Update personal records	10	85%
3. Posting monthly contributions to member records	10	95%
4. Calculate and action incoming transfer values	35	85%
5. Deferred benefits – payment of lump sums	3	90%
6. Provide details of deferred benefit entitlement	10	85%
7. Refund of contributions – notification of entitlement	5	85%
8. Refund of contributions – payment	5	90%
9. Pay transfers out on receipt of acceptance	35	85%
10. Provide estimate of retirement benefits	10	75%
11. Retirement benefits – payment of lump sum	3	90%
12. Retirement benefits – recalculations of pension/lump sum	10	85%
13. Calculation and payment of death benefits on receipt of all necessary information	5	90%
14. Make death grant payment to the member's nomination (provided all relevant information is received)	1 month	100%
15. Percentage of telephone calls answered within 20 seconds		90%
16. Annual benefit statements issued to deferred members by		31 May
17. Annual benefit statements issued to active members by		31 August
18. Make payment of pensions on the due date		100%
19. Issue P60's to pensioners within statutory deadlines		100%
20. Provide information on request in respect of pension share on divorce within legislative timescales		100%
21. Implement Pension Share Orders within legislative timescales		100%
22. Undertake annual reviews to establish continuing entitlements to pensions for children over the age of 17		100%
23. Implement changes in pensioner circumstances for the next available pensioner payroll		100%

7. Unsatisfactory performance

Measuring performance

Both employer and administrator targets will be measured on a quarterly basis using the Civica document management system. Employers will be notified of their performance level each quarter.

Administrator performance levels will be published on a monthly basis to the shared service pension funds and fire authorities.. Overall employer and administrator performance will be published by LPF in the Report and Accounts.

Unsatisfactory performance

Where an employer materially fails to operate in accordance with the standards described in this strategy, and this leads to extra costs being incurred by the administering authority, the administering authority may issue a written notice to the employer requiring that these extra costs be met by the employer. A schedule of charges is detailed in Appendix B.

Appendix A – Main contact registration and authorised user list



Main contact registration form

Employer name and location code
Employer address

Important: please read the guidance note on **Managing your WYPF contacts** before you complete this form.

Strategic contact

Name	Address if different from above
Job title	
Phone	Specimen signature
Email	

Administration contact

Name	Address if different from above
Job title	
Phone	Specimen signature
Email	

Finance contact

Name	Address if different from above
Job title	
Phone	Specimen signature
Email	

Contact at third-party payroll provider (if applicable and not listed above)

Name	Company name and address
Job title	
Phone	Specimen signature
Email	

Date signatures valid from	Signed (by current authorised signatory)
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Appendix B – Schedule of charges

Performance areas	Reason for charge	Basis of charge
Any overpayment made to a member due to inaccurate information provided by an employer will be recovered from employer, if the total overpaid is more than £50.	If the overpaid amount is the result of the employer's error, and the amount is over £50, then as such it will be recharged to the employer, plus costs of resolving and recovering the overpayment. If the overpayment is recovered from the member, then the amount recovered will be passed back to the employer, less any cost of overpayment recovery actions.	Actual amount overpaid + admin charge (admin charge will be based on managerial input at level III), minimum half day charge of £110 + VAT + cost of recovery actions (court and legal fees). Any part or all of this charge may be waived at head of service discretion.
Contributions to be paid anytime but latest date by 19th of month (weekends and bank holidays on the last working day before 19th).	Due by 19th month – late receipt of funds, plus cost of additional time spent chasing payment.	Number of days late interest charged at base rate plus 1%. Failure to provide appropriate information, resulting in significant work will result in admin charge (at Senior Pensions Officers level II) at £136 a day. This may be waived at head of service discretion.
Monthly return due anytime but latest by 19th month, errors on return, i.e. employer/employee rate deducted incorrectly, exception reporting errors to be resolved within two months.	Due by 19th month, any additional work caused by late receipt of information incorrect information, incorrect contributions.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at Senior Pensions Officers level II) at £136 a day. This may be waived at head of service discretion.
Change in member detail	If submitted via monthly data, the administrator will process data within 2 weeks following monthly data submission. For exception reports output from monthly returns, change data response must be provided to the administrator within 2 weeks of receipt of the exception report.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at Pensions Officer level I) at £96 + VAT a day. This may be waived at head of service discretion.
Early leavers information	If submitted via monthly data, the administrator will process data within 2 weeks following monthly data submission, else within 6 weeks of date of	Failure to provide appropriate information, resulting in significant work will result in admin charge (at Pensions Officer level I) at £96 + VAT a

	leaving. For exception reports leaver forms provided to the administrator within two months of receipt of the exception report.	day. This may be waived at head of service discretion.
Retirement notifications	Due 10 working days before last day of employment unless the reason for retirement is ill health or redundancy – additional work caused by late receipt of information.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at senior pension officers level II) at £136 + VAT a day. This may be waived at head of service discretion.
Death in membership	Due within 3 working days of the notification – additional work caused by late receipt of information.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at pension manager level III) at £220 + VAT a day. This may be waived at head of service discretion.
AVC deducted from pay to be paid anytime but latest date by 19th month. (weekends and bank holidays on the last working day before 19th).	Additional investigative work caused through lack of compliance by employer.	Failure to comply by employer, causing additional work for WYPF will result in admin charge (at pension officers level I) at £96 + VAT a day. This may be waived at head of service discretion.
Re-issue of invoices	Charge based on number of request.	Additional work caused by reproducing invoices will result in admin charge (at pension officer level I) at £96 + VAT a day. This may be waived at head of service discretion.
Authorised officers list not updated – Pension Liaison Officers, monthly contributions responsible officers.	Costs of additional work resulting from employer's failure to notify the administrator of change in authorised officers list.	Failure to comply by employer, causing additional work for the administrator will result in admin charge (at Pensions Officer level I) at £96 + VAT a day. This may be waived at head of service discretion.
Security breach on system re	Recharge employers any fines	Actual amount fine imposed +

data protection.	imposed on us in this event.	admin charge (admin charge will be based on managerial input at level III) at £220 + VAT a day. This charge may be waived at head of service discretion.
Member requests estimate	The first estimate provided in each financial year is free, then subsequent estimates are chargeable.	1st request in each financial year is free. Additional request is charged at a notional charge of £50 + VAT is made. This charge is for each member's record folder reference.
Pension sharing order	For pension sharing order work, each party will be charged according to the instruction in the court order.	The charge is £250 + VAT for this work.
Miscellaneous items: • Benefit recalculation • Member file search and record prints • Supplementary information requests	Where information is requested by members that is in addition to routine information.	A notional charge of £50 + VAT will be levied. Where the member has more than one known record, the charge is for each record.

Appendix C – Charging Levels

Charges will be made on half a day basis, but for less than a quarter day no charge will be made and for more than half a day a full-day charge will be made.

Charge levels	I	II	III
Daily charge	£96	£136	£220
Half day charge	£48	£68	£110

Level I – work at Pensions Officer level

Level II – work at Senior Pensions Officer level

Level III – work at Pensions Manager level



**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pension Board
Date:	16 July 2020
Subject:	Pension Board Effectiveness Review

Summary:

This report acts as a discussion document to review the effectiveness of the Pension Board.

Recommendation(s):

That the Board note the report and agree any actions required to improve its effectiveness.

Background

- 1 The Lincolnshire Pension Board was established in April 2015 under the provisions of Section 5 of the Public Service Pensions Act 2013 and regulation 106 of the LGPS Regulations 2013 (as amended).
- 2 Regulation 106 specifies that each Administering Authority should establish its own Local Pension Board with responsibility for assisting the Administering Authority as set out below:
 - to secure compliance with:
 - the Regulations;
 - other legislation relating to the governance and administration of the LGPS; and
 - the requirements imposed by the Regulator in relation to the LGPS.
 - to ensure the effective and efficient governance and administration of the LGPS.
- 3 In addition to the creation of Local Pension Boards, the regulatory powers of the Pensions Regulator (tPR) were extended under section 17 and Schedule 4 of the 2013 Act to cover some aspects of public service pension schemes, including the LGPS.
- 4 TPR expects Boards to regular monitor and assess their effectiveness in performing their role. The Lincolnshire Pension Board last reviewed its effectiveness in March 2018.

- 5 The most helpful reviews evaluate both inputs and outcomes. Traditionally, effectiveness reviews have focused on inputs, perhaps because these are the easiest aspects to measure. However, the Board's key role is to ensure the effective and efficient governance and administration of the LGPS. Therefore, it is the outcomes and progress towards these outcomes that ultimately determine the performance of the Board.
- 6 Inputs are the factors that contribute to the quality of Board meetings. Examples of key factors might be:
 - Board composition and the existence of the appropriate range of skills and experience.
 - Identification of training needs, the training itself and the application of knowledge and skills.
 - Support to the Board.
 - Meeting papers, structure of meeting agendas and use of meeting time.
 - The level and quality of participation in discussion and decision-making, where required.
- 7 Outcomes can be measured by reviewing Board performance and progress against its purpose. This is more difficult to measure, but one example might be improvements in compliance with tPR checklist.
- 8 A review of effectiveness allows strengths and weaknesses to be identified and should ultimately lead to a highly engaged and energised Board.

Conclusion

- 9 It is best practice and an expectation of tPR, that Boards review their effectiveness regularly. This paper allows for discussion and assessment as to how effective the Board considers itself.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk.

**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pension Board
Date:	16 July 2020
Subject:	Training Needs

Summary:

This item provides Board Members the opportunity to discuss any training attended since the last Board meeting and provide feedback to other Board Members on its content.

This report also brings to the Board any conference or training highlight notes from the previous three month period.

The Board should consider the results of the training needs self-assessment and if there is any further training they wish to receive or attend in future months.

Recommendation(s):

That the Board are:

1. requested to share information on relevant events attended since the last Board meeting;
2. note any conference and training feedback from the previous three months; and
3. consider the results of the training needs questionnaire and if there is any further training required in future months.

Background

- 1 The Fund's Training Policy requires members of the Pensions Committee, following attendance at any conference, seminar or external training events to share their thoughts on the event, including whether they would recommend it for others to attend. It was agreed that this would be a useful addition to Pension Board meetings too.
2. Therefore the Board are requested to share information on relevant events attended since the last Board meeting.

3. Due to the Covid-19 pandemic there are no conference highlights to share with the Board this quarter.

Training Needs Questionnaire

4. As part of the on-going governance of the Fund and to ensure the Fund is compliant with the guidance issued by the Regulator in the Code of Practice No. 14 – Governance and Administration of Public Service Pension Schemes, a self-assessment questionnaire has been issued to all members of the Pension Board. The questionnaire is based on the CIPFA knowledge and skills framework for Local Pension Boards, where there are eight areas of knowledge and skills that have been identified as the core technical requirements:

- Pensions legislative
- Pensions governance
- Pensions administration
- Pensions accounting and auditing standards
- Pensions services procurement and relationship management
- Investment performance and risk management
- Financial markets and products knowledge
- Actuarial methods, standards and practices

5. Members of the Board were asked to score their current level of understanding using the following scale:

1 = I have no knowledge and understanding of this area

2 = I have a basic knowledge and understanding of this area

3 = I have appropriate knowledge and understanding of this area

4 = I have a good knowledge and understanding of this area

5 = I have an excellent understanding and am confident in this area

6. Three responses were received. These have been collated and are attached at **Appendix A**. There is an opportunity now for the Board to discuss the results of the survey and consider if there is any collective training required, and how individual training needs can be addressed in the coming year.

Conclusion

7. The Board consider past training events attended and any future training needs.

Consultation

- a) **Have Risks and Impact Analysis been carried out?**

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Training Needs Questionnaire Responses

Background Papers

This report was written by Claire Machej, who can be contacted on 01522 553641 or claire.machej@lincolnshire.gov.uk.

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Results of the Training Needs Self-Assessment

1. Pensions legislative and governance context	Score (1-5)			
A general awareness of the pensions legislative framework in the UK.	3	4	5	5
An overall understanding of the legislation specific to the scheme and the main features relating to benefits, administration and investment.	3	4	4	5
An appreciation of LGPS discretions and how the formulation of the discretionary policies impacts on the pension fund, employers and local taxpayers.	2	4	3	5
A regularly updated appreciation of the latest changes to the scheme rules.	2	3	3	5

2. Pensions Governance	Score (1-5)			
Knowledge of the role of the administering authority in relation to the LGPS.	3	4	4	5
An understanding of how the roles and powers of the MHCLG, the Pensions Regulator, the Pensions Advisory Service and the Pensions Ombudsman relate to the workings of the scheme.	3	4	4	5
Knowledge of the role of the Scheme Advisory Board and how it interacts with other bodies in the governance structure.	2	4	4	5
Broad understanding of the role of pensions fund committees in relation to the fund, administering authority, employing authorities, scheme members and taxpayers.	3	4	5	5
An awareness of the role and statutory responsibilities of the treasurer and monitoring officer.	2	4	5	5
Knowledge of the <i>Principles for Investment Decision Making and Disclosure</i> and associated CIPFA and SOLACE guidance.	2	3	3	3
A detailed knowledge of the duties and responsibilities of pension board members.	3	4	4	5
Knowledge of the stakeholders of the pension fund and the nature of their interests.	2	3	4	5
Knowledge of consultation, communication and involvement options relevant to the stakeholders.	2	3	4	5
Knowledge of how pension fund management risk is monitored and managed.	3	3	4	5

An understanding of how conflicts of interest are identified and managed.	3	3	4	5
An understanding of how breaches of the law are reported.	2	3	4	5
An understanding of how pooling will impact on governance of the LGPS.	3	3	4	3/4

3. Pensions Administration	Score (1-5)			
An understanding of best practice in pensions administration e.g. performance and cost measures.	3	4	4	5
An understanding of the required and adopted scheme policies and procedures relating to: <ul style="list-style-type: none"> • Member data maintenance and record-keeping processes • Internal dispute resolution • Contributions collection • Scheme communication and materials 	3	3	4	5
Knowledge of how discretionary powers operate.	2	4	3	5
Knowledge of the pensions administration strategy and delivery (including, where applicable, the use of third party suppliers, their selection, performance management and assurance processes).	3	3	5	5
An understanding of how the pension fund interacts with the taxation system in the UK and overseas in relation to benefits administration.	2	3	4	5
An understanding of what AVC arrangements exist and the principles relating to the operation of those arrangements, the choice of investments to be offered to members, the provider's investment and fund performance report and the payment schedule for such arrangements.	2	3	4	5

4. Pensions accounting and auditing standards	Score (1-5)			
An understanding of the Accounts and Audit Regulations and legislative requirements relating to internal controls and proper accounting practice.	3	4	4	5
An understanding of the role of both internal and external audit in the governance and assurance process.	3	4	5	5
An understanding of the role played by third party assurance providers.	2	4	4	5

5. Pensions services procurement and relationship management	Score (1-5)			
An understanding of the background to current public procurement policy and procedures, and of the values and scope of public procurement and the roles of key decision makers and organisations.	2	4	3	4
A general understanding of the main public procurement requirements of UK and EU legislation.	2	4	3	4
An understanding of the nature and scope of risks for the pension fund and of the importance of considering risk factors when selecting third parties.	3	4	3	5
An understanding of how the pension fund monitors and manages the performance of their outsourced providers.	3	4	4	5

6. Investment performance and risk management	Score (1-5)			
An understanding of the importance of monitoring asset returns relative to the liabilities and a broad understanding of ways of assessing long-term risks.	3	3	5	5
An awareness of the <i>Principles for Investment Decision Making and Disclosure</i> on performance management and the approach adopted by the administering authority.	2	3	4	4
An awareness of the range of support services, who supplies them and the nature of the performance monitoring regime.	2	-	4	2

7. Financial markets and products knowledge	Score (1-5)			
AN understanding of the risk and return characteristics of the main asset classes (equities, bonds, property etc.).	4	4	4	5
Understanding of the role of these assets classes in long-term pension fund investing.	4	4	4	5
Understanding of the primary importance of the fund's statement of investment principles and the investment strategy decision.	4	4	4	5
A broad understanding of the workings of the financial markets and of the investment vehicles available to the pension fund and the nature of the associated risks.	4	4	4	5
An understanding of the limits placed by regulation on the investment activities of local government pension funds.	2	4	3	5
An understanding of how the pension fund interacts with the taxation system in the UK and overseas in relation to investments.	2	4	4	5

8. Actuarial methods, standards and practices	Score (1-5)			
A general understanding of the role of the fund actuary.	3	4	4	5
Knowledge of the valuation process, including developing the funding strategy in conjunction with the fund actuary, and the inter-valuation monitoring.	3	4	4	5
An awareness of the importance of monitoring early and ill health retirement strain costs.	2	4	5	5
A broad understanding of the implications of including new employers into the fund and of the cessation of existing employers.	2	4	4	5
A general understanding of the relevant considerations in relation to outsourcings and bulk transfers.	2	4	4	5
A general understanding of the importance of the employer covenant and the relative strengths of the covenant across the fund employers.	2	4	5	5

Specific topics for individual training
<p>Would welcome a more detailed briefing/update, on how the Fund assesses and reviews the employer contribution rates for Admitted Bodies and Academies including the ongoing requirement for Employer Bonds.</p> <p>Cannot recall having sight of AVC's investment and performance reports. For completeness they may need to be shared with the Board.</p> <p>Not personally content (yet) that I have a good enough understanding (or hold the confidence) of what the future impact of pooling is going to have on the LGPS and the Lincolnshire Pension Fund.</p>

**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pension Board
Date:	16 July 2020
Subject:	Work Programme

Summary:

This report provides the Board with any opportunity to consider its work programme for the coming meetings.

Recommendation(s):

To review the Board's future work programme, highlighting any activity for possible inclusion in the work programme.

Background

1. The work programme, which is attached at **Appendix A** to this report, outlines the items for consideration at future meetings of the Board. Members of the Board are invited to review, consider and comment on the future work programme.
2. The Board meeting arranged for 19 March 2020 was cancelled due to the Covid-19 pandemic and nationwide lockdown. The Board's quarterly agenda is made up of two types of items, regular quarterly reports and ad hoc items which are either selected by the Board for consideration or form part of the ongoing work of the pension fund. The items from the March meeting will be dealt with as follows:
 - The regular quarterly/cyclical items have been updated for the end of March 2020 position and have been included on today's agenda;
 - The Review of the Effectiveness of the Board has been included as part of the July agenda;
 - The following ad hoc items have been included with this item for the Board to consider if there are any fundamental issues or concerns to be flagged. These items include:
 - Item 8 Lincolnshire Pension Fund Funding Strategy Statement and Valuation Report 2019 (**Appendix B**);

- Item 9 Lincolnshire Pension Fund Policies Review (**Appendix C**); and
- Item 11 Lincolnshire Pension Fund Business Plan 2020/21 (**Appendix D**).

Conclusion

Members of the Board are invited to review, consider and comment on the work programme. There is also the chance to comment on the items from the cancelled March meeting.

Consultation

a) Have Risks and Impact Analysis been carried out?

No

b) Risks and Impact Analysis

N/A

Appendices

These are listed below and attached at the back of the report	
Appendix A	Work Programme
Appendix B	Item 8 Lincolnshire Pension Fund Funding Strategy Statement and Valuation Report 2019
Appendix C	Item 9 Lincolnshire Pension Fund Policies Review
Appendix D	Item 11 Lincolnshire Pension Fund Business Plan 2020/21

Background Papers

No Background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Claire Machej, who can be contacted on 01522 553641 or claire.machej@lincolnshire.gov.uk.

LGPS PENSION BOARD – WORK PLAN

16 July 2020	
Meeting to be held virtually and broadcast to the public	
<i>Item</i>	<i>Lead Officer</i>
Pension Fund Update Report (<i>Report</i>)	Jo Ray (Head of Pensions)
Pensions Administration Update Report (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
The Pension Regulator Data Scores (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Temporary Bank Accounts (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Employer Monthly Submissions Update (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Annual Review of Pension Fund Risk Register (<i>Report</i>)	Jo Ray (Head of Pensions)
Annual Report and Accounts 2019/20 – Approval of Draft Report and Accounts (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Review of the Effectiveness of the Pensions Board	Jo Ray (Head of Pensions)
Training Needs (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Work Programme (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)

15 October 2020

Meeting to be held virtually and broadcast to the public

<i>Item</i>	<i>Lead Officer</i>
Pension Fund Update Report (<i>Report</i>)	Jo Ray (Head of Pensions)
Pensions Administration Update Report (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
The Pension Regulator Data Scores (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Temporary Bank Accounts (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Employer Monthly Submissions Update (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Actuarial Appointment (<i>Report</i>)	Jo Ray (Head of Pensions)
Annual Report and Accounts 2019/20 – External Audit Outcomes (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Cyber Security (<i>Presentation</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Training Needs (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Workplan (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)

7 January 2021

Meeting Location: TBC

<i>Item</i>	<i>Lead Officer</i>
Pension Fund Update Report (<i>Report</i>)	Jo Ray (Head of Pensions)
Pensions Administration Update Report (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
The Pension Regulator Data Scores (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Temporary Bank Accounts (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Employer Monthly Submissions Update (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Training Needs (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Workplan (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)

18 March 2021

Meeting Location: TBC

<i>Item</i>	<i>Lead Officer</i>
Pension Fund Update Report (<i>Report</i>)	Jo Ray (Head of Pensions)
Pensions Administration Update Report (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
The Pension Regulator Data Scores (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Temporary Bank Accounts (<i>Report</i>)	Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund)
Employer Monthly Submissions Update (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Annual Review of Policies	Jo Ray (Head of Pensions)
Annual Report and Accounts 2020/21 – Review and Approval of Accounting Policies (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Training Needs (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)
Workplan (<i>Report</i>)	Claire Machej (Accounting, Investment and Governance Manager)

**Open Report on behalf of Andrew Crookham,
Executive Director - Resources**

Report to:	Lincolnshire Pension Board
Date:	19 March 2020
Subject:	Lincolnshire Pension Fund - Funding Strategy Statement and 2019 Valuation Report

Summary:

This paper brings the Funding Strategy Statement and the draft 2019 Valuation report to the Board for consideration. This statement sets out how the Pension Fund aims to become fully funded over the long term, whilst considering affordability, transparency, stability and prudence, and the Valuation shows the funding position as at 31 March 2019 and the employer contribution rates payable for the three years to March 2023.

Recommendation(s):

That the Board note the Funding Strategy Statement and the 2019 Valuation report.

Background

1. The Funding Strategy Statement (FSS) (draft attached as appendix A) is a summary of the Pension Fund's approach to funding its liabilities. It is required to be reviewed at least every three years, alongside the triennial valuation. The initial Valuation outcome was presented to the Board in October 2019, and the final report detailing the funding position and the employer contribution rates payable to for the three years to March 2023 is attached at Appendix B.
2. As employees contributions are set by the Government, employers must pay the balance of any cost in delivering the benefits to members. The FSS focuses on the pace at which these liabilities are funded, and, insofar as is practical, the measures to ensure that employers or pools of employers pay for their own liabilities. The final agreed contribution rates for employers are shown in appendix B.
3. The purpose of the FSS, as defined by the Ministry of Housing, Communities and Local Government (MHCLG), is:

- to establish a **clear and transparent fund-specific strategy** which will identify how employers' pension liabilities are best met going forward;
 - to support the regulatory framework to maintain as **nearly constant employer contribution rates as possible**; and
 - to take a **prudent longer-term view** of funding those liabilities.
4. The aim of this funding policy is:
- to ensure the long-term solvency of the Fund, using a prudent long term view. This will ensure that sufficient funds are available to meet all members'/dependants' benefits as they fall due for payment;
 - to ensure that employer contribution rates are reasonably stable where appropriate;
 - to minimise the long-term cash contributions which employers need to pay to the Fund, by recognising the link between assets and liabilities and adopting an investment strategy which balances risk and return (NB this will also minimise the costs to be borne by Council Tax payers);
 - to reflect the different characteristics of different employers in determining contribution rates. This involves the Fund having a clear and transparent funding strategy to demonstrate how each employer can best meet its own liabilities over future years; and
 - to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations.
5. A key challenge for the Administering Authority is to balance the need for stable, affordable employer contributions with the requirement to take a prudent, longer-term view of funding and ensure the solvency of the Fund. With this in mind, the Fund's three-step process identifies the key issues:
1. What is a suitably (but not overly) prudent funding target?
 2. How long should the employer be permitted to reach that target? This should be realistic but not so long that the funding target is in danger of never actually being achieved.
 3. What probability is required to reach that funding target? This will always be less than 100% as we cannot be certain of future market movements. Higher probability "bars" can be used for employers where the Fund wishes to reduce the risk that the employer ceases leaving a deficit to be picked up by other employers.
6. The FSS also includes mechanisms for dealing with employers ceasing, ill-health retirements and early retirement costs. In addition to these normal

events, the FSS also explains the approach the Fund has taken for dealing with the uncertainty arising from the McCloud court case and its potential impact on the LGPS benefit structure.

7. The key risks, around financial, demographic and governance issues, and the controls in place are detailed in appendix C of the FSS.
8. The FSS should to be read alongside the Triennial Valuation Report, the Investment Strategy Statement and the Governance Compliance Statement to provide a full overview of the Fund's governance structure.
9. The FSS was sent to all employers in the Fund for consultation in mid-November 2019, alongside their individual schedules of results detailing their contribution rates for the three years to March 2023. Four employer sessions with the Fund Actuary were held in late November, giving employers the opportunity to comment or question the FSS or their contribution rates. No feedback from employers on the consultation has been received.
10. The draft Valuation report (appendix B) summarises the approach that has been undertaken, the results at a Fund level, and a sensitivity analysis showing how the funding level would move should certain assumptions change, e.g. CPI or life expectancy. The individual employer rates are included at Appendix 3.
11. All employers returned signed declarations confirming the contribution rates and any secondary payments that they would pay for the three years to March 2023.
12. There are three areas in the draft that are awaiting further information – a comment on the March 2020 position (p11), the date of the final Valuation report (p20) and appendix 4 (p28) which is the GAD Section 13 dashboard , and will be available shortly. These will be completed before the report is published ahead of 31 March 2020 deadline.

Conclusion

13. The Funding Strategy Statement has been reviewed following the 2019 Triennial Valuation and has been updated to take account of the process used to finalise employer contribution rates, included within the draft Valuation report.

Consultation

a) Have Risks and Impact Analysis been carried out??

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Lincolnshire Pension Fund - Draft Funding Strategy Statement
Appendix B	Draft 2019 Valuation Report and Employer Contribution Rates

Background Papers

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk.

Lincolnshire Pension Fund

Funding Strategy Statement

March 2020

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Funding Strategy Statement

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1 Introduction

1.1 What is this document?

This is the Funding Strategy Statement (FSS) of the Lincolnshire Pension Fund (“the Fund”), which is administered by Lincolnshire County Council, (“the Administering Authority”).

It has been prepared by the Administering Authority in collaboration with the Fund’s actuary, Hymans Robertson LLP, and after consultation with the Fund’s employers, investment adviser and approval by the Pensions Committee. It is effective from March 2020, and for the setting of employer contribution rates calculated following the March 2019 Valuation.

1.2 What is the Lincolnshire Pension Fund?

The Fund is part of the national Local Government Pension Scheme (LGPS). The LGPS was set up by the UK Government to provide retirement and death benefits for local government employees, and those employed in similar or related bodies, across the whole of the UK. The Administering Authority runs the Lincolnshire Pension Fund, in effect the LGPS for the Lincolnshire area, to make sure it:

- receives the proper amount of contributions from employees and employers, and any transfer payments;
- invests the contributions appropriately, with the aim that the Fund’s assets grow over time with investment income and capital growth; and
- uses the assets to pay Fund benefits to the members (as and when they retire, for the rest of their lives), and to their dependants (as and when members die), as defined in the LGPS Regulations. Assets are also used to pay transfer values and administration costs.

The roles and responsibilities of the key parties involved in the management of the Fund are summarised in [Appendix B](#).

1.3 Why does the Fund need a Funding Strategy Statement?

Employees’ benefits are guaranteed by the LGPS Regulations, and do not change with market values or employer contributions. Investment returns will help pay for some of the benefits, but probably not all, and certainly with no guarantee. Employees’ contributions are fixed in those Regulations also, at a level which covers only part of the cost of the benefits.

Therefore, employers need to pay the balance of the cost of delivering the benefits to members and their dependants.

The FSS focuses on how employer liabilities are measured, the pace at which these liabilities are funded, and how employers or pools of employers pay for their own liabilities. This statement sets out how the Administering Authority has balanced the conflicting aims of:

- affordability of employer contributions,
- transparency of processes,
- stability of employers’ contributions, and
- prudence in the funding basis.

There are also regulatory requirements for an FSS, as given in [Appendix A](#).

The FSS is a summary of the Fund's approach to funding its liabilities, and this includes reference to the Fund's other policies; it is not an exhaustive statement of policy on all issues. The FSS forms part of a framework which includes:

- the LGPS Regulations;
- the Rates and Adjustments Certificate (confirming employer contribution rates currently for the next three years) which can be found in an appendix to the formal valuation report;
- the Fund's discretionary policies on admissions, cessations and bulk transfers;
- actuarial factors for valuing individual transfers, early retirement costs and the costs of buying added service; and
- the Fund's Investment Strategy Statement (see [Section 4](#))

1.4 How does the Fund and this FSS affect me?

This depends on who you are:

- a member of the Fund, i.e. a current or former employee, or a dependant: the Fund needs to be sure it is collecting and holding enough money so that your benefits are always paid in full;
- an employer in the Fund (or which is considering joining the Fund): you will want to know how your contributions are calculated from time to time, that these are fair by comparison to other employers in the Fund, in what circumstances you might need to pay more and what happens if you cease to be an employer in the Fund. Note that the FSS applies to all employers participating in the Fund;
- an Elected Member whose council participates in the Fund: you will want to be sure that the council balances the need to hold prudent reserves for members' retirement and death benefits, with the other competing demands for council money;
- a Council Tax payer: your council seeks to strike the balance above, and also to minimise cross-subsidies between different generations of taxpayers.

1.5 What does the FSS aim to do?

The FSS sets out the objectives of the Fund's funding strategy, such as:

- to ensure the long-term solvency of the Fund, using a prudent long term view. This will ensure that sufficient funds are available to meet all members'/dependants' benefits as they fall due for payment;
- to ensure that employer contribution rates are reasonably stable where appropriate;
- to minimise the long-term cash contributions which employers need to pay to the Fund, by recognising the link between assets and liabilities and adopting an investment strategy which balances risk and return (**NB** this will also minimise the costs to be borne by Council Tax payers);
- to reflect the different characteristics of different employers in determining contribution rates. This involves the Fund having a clear and transparent funding strategy to demonstrate how each employer can best meet its own liabilities over future years; and
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations.

1.6 How do I find my way around this document?

In [Section 2](#) there is a brief introduction to some of the main principles behind funding, i.e. deciding how much an employer should contribute to the Fund from time to time.

In [Section 3](#) we outline how the Fund calculates the contributions payable by different employers in different situations.

In [Section 4](#) we show how the funding strategy is linked with the Fund's investment strategy.

In [Section 5](#) we outline Section 13 reporting requirements.

In the [Appendices](#) we cover various issues in more detail if you are interested:

- A. the regulatory background, including how and when the FSS is reviewed,
- B. who is responsible for what,
- C. what issues the Fund needs to monitor, and how it manages its risks,
- D. some more details about the actuarial calculations required,
- E. the assumptions which the Fund actuary currently makes about the future,
- F. a [glossary](#) explaining the technical terms occasionally used here.

If you have any other queries please contact Jo Ray, Head of Pensions, in the first instance at e-mail address jo.ray@lincolnshire.gov.uk or on telephone number 01522 553656.

2 Basic Funding issues

(More detailed and extensive descriptions are given in [Appendix D](#)).

2.1 How does the actuary calculate the required contribution rate?

In essence this is a three-step process:

- Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See [Appendix E](#) for more details of what assumptions we make to determine that funding target;
- Determine the time horizon over which the employer should aim to achieve that funding target. See the table in [3.3](#) and [Note \(c\)](#) for more details;
- Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See [2.3](#) below, and the table in [3.3 Note \(e\)](#) for more details.

2.2 What is each employer's contribution rate?

This is described in more detail in [Appendix D](#). Employer contributions are normally made up of two elements:

- a) the estimated cost of benefits being built up each year, after deducting the members' own contributions and including an allowance for administration expenses. This is referred to as the "*Primary rate*", and is expressed as a percentage of members' pensionable pay; plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "*Secondary rate*". In broad terms, payment of the Secondary rate is in respect of benefits already accrued at the valuation date. The Secondary rate may be expressed as a percentage of pay or a monetary amount in each year.

The rates for all employers are shown in the Fund's Rates and Adjustments Certificate, which forms part of the formal Actuarial Valuation Report. Employers' contributions are expressed as minima, with employers able to pay contributions at a higher rate. Account of any higher rate will be taken by the Fund actuary at subsequent valuations, i.e. will be reflected as a credit when next calculating the employer's contributions.

2.3 What different types of employer participate in the Fund?

Historically the LGPS was intended for local authority employees only. However over the years, with the diversification and changes to delivery of local services, many more types and numbers of employers now participate. There are currently more employers in the Fund than ever before, a significant part of this being due to new academies.

In essence, participation in the LGPS is open to public sector employers providing some form of service to the local community. Whilst the majority of members will be local authority employees (and ex-employees), the majority of participating employers are those providing services in place of (or alongside) local authority services: academy schools, contractors, housing associations, charities, etc.

The LGPS Regulations define various types of employer as follows:

Scheduled bodies - councils, and other specified employers such as academies and further education establishments. These must provide access to the LGPS in respect of their employees who are not eligible to join another public sector scheme (such as the Teachers Scheme). These employers are so-called because they are specified in a schedule to the LGPS Regulations.

It is now possible for Local Education Authority schools to convert to academy status, and for other forms of school (such as Free Schools) to be established under the academies legislation. All such **academies (or Multi Academy Trusts)**, as employers of non-teaching staff, become separate new employers in the Fund. As academies are defined in the LGPS Regulations as “Scheduled Bodies”, the Administering Authority has no discretion over whether to admit them to the Fund, and the academy has no discretion whether to continue to allow its non-teaching staff to join the Fund. There has also been guidance issued by the MHCLG regarding the terms of academies’ membership in LGPS Funds.

Designating employers - employers such as town and parish councils are able to participate in the LGPS via resolution (and the Fund cannot refuse them entry where the resolution is passed). These employers can designate which of their employees are eligible to join the scheme.

Other employers are able to participate in the Fund via an admission agreement, and are referred to as ‘admission bodies’. These employers are generally those with a “community of interest” with another scheme employer – **community admission bodies** (“CAB”) or those providing a service on behalf of a scheme employer – **transfree admission bodies** (“TAB”). CABs will include housing associations and charities, TABs will generally be contractors. The Fund is able to set its criteria for participation by these employers and can refuse entry if the requirements as set out in the Fund’s admissions policy are not met. (NB The terminology CAB and TAB has been dropped from recent LGPS Regulations, which instead combine both under the single term ‘admission bodies’; however, we have retained the old terminology here as we consider it to be helpful in setting funding strategies for these different employers).

2.4 How does the calculated contribution rate vary for different employers?

All three steps above are considered when setting contributions (more details are given in [Section 3](#) and [Appendix D](#)).

1. The **funding target** is based on a set of assumptions about the future, (e.g. investment returns, inflation, pensioners’ life expectancies). If an employer is approaching the end of its participation in the Fund then its funding target may be set on a more prudent basis, so that its liabilities are less likely to be spread among other employers after its cessation;
2. The **time horizon** required is, the period over which the funding target is achieved. Employers may be given a lower time horizon if they have a less permanent anticipated membership, or do not have tax-raising powers to increase contributions if investment returns under-perform; and
3. The **likelihood of achieving** the funding target over that time horizon will be dependent on the Fund’s view of the strength of employer covenant and its funding profile. Where an employer is considered to be weaker, then the required likelihood will be set higher, which in turn will increase the required contributions (and vice versa).

For some employers it may be agreed to pool contributions, see [3.4](#).

Any costs of non ill-health early retirements must be paid by the employer, see [3.6](#).

Costs of ill-health early retirements are covered in [3.7](#) and [3.8](#).

2.5 How is a funding level calculated?

An employer's "funding level" is defined as the ratio of:

- the market value of the employer's share of assets (see [Appendix D](#), section [D5](#), for further details of how this is calculated), to
- the value placed by the actuary on the benefits built up to date for the employer's employees and ex-employees (the "liabilities"). The Fund actuary agrees with the Administering Authority the assumptions to be used in calculating this value.

If this is less than 100% then it means the employer has a shortfall, which is the employer's "deficit"; if it is more than 100% then the employer is said to be in "surplus". The amount of deficit or shortfall is the difference between the asset value and the liabilities value.

It is important to note that the funding level and deficit/surplus are only measurements at a particular point in time, on a particular set of assumptions about the future. Whilst we recognise that various parties will take an interest in these measures, for most employers the key issue is how likely it is that their contributions will be sufficient to pay for their members' benefits (when added to their existing asset share and anticipated investment returns).

In short, funding levels and deficits are short term, high level risk measures, whereas contribution-setting is a longer term issue.

2.6 How does the Fund recognise that contribution levels can affect council and employer service provision, and council tax?

The Administering Authority and the Fund actuary are acutely aware that, all other things being equal, a higher contribution required to be paid to the Fund will mean less cash available for the employer to spend on the provision of services. For instance:

- Higher Pension Fund contributions may result in reduced council spending, which in turn could affect the resources available for council services, and/or greater pressure on council tax levels;
- Contributions which Academies pay to the Fund will therefore not be available to pay for providing education; and
- Other employers will provide various services to the local community, perhaps through housing associations, charitable work, or contracting council services. If they are required to pay more in pension contributions to the LGPS then this may affect their ability to provide the local services at a reasonable cost.

Whilst all this is true, it should also be borne in mind that:

- The Fund provides invaluable financial security to local families, whether to those who formerly worked in the service of the local community who have now retired, or to their families after their death;
- The Fund must have the assets available to meet these retirement and death benefits, which in turn means that the various employers must each pay their own way. Lower contributions today will mean higher contributions tomorrow: deferring payments does not alter the employer's ultimate obligation to the Fund in respect of its current and former employees;
- Each employer will generally only pay for its own employees and ex-employees (and their dependants), not for those of other employers in the Fund;
- The Fund strives to maintain reasonably stable employer contribution rates where appropriate and possible. However, a recent shift in regulatory focus means that solvency within each generation is considered by the Government to be a higher priority than stability of contribution rates;
- The Fund wishes to avoid the situation where an employer falls so far behind in managing its funding shortfall that its deficit becomes unmanageable in practice: such a situation may lead to employer insolvency and the resulting deficit falling on the other Fund employers. In that situation, those employers' services would in turn suffer as a result;
- Council contributions to the Fund should be at a suitable level, to protect the interests of different generations of council tax payers. For instance, underpayment of contributions for some years will need to be balanced by overpayment in other years; the council will wish to minimise the extent to which council tax payers in one period are in effect benefitting at the expense of those paying in a different period.

Overall, therefore, there is clearly a balance to be struck between the Fund's need for maintaining prudent funding levels, and the employers' need to allocate their resources appropriately. The Fund achieves this through various techniques which affect contribution increases to various degrees (see [3.1](#)). In deciding which of these techniques to apply to any given employer, the Administering Authority takes a view on the financial standing of the employer, i.e. its ability to meet its funding commitments and the relevant time horizon.

The Administering Authority will consider a risk assessment of that employer using a knowledge base which is regularly monitored and kept up-to-date. This will include such information as the type of employer, its membership profile and funding position, any guarantors or security provision, material changes anticipated, etc.

For instance, where the Administering Authority has reasonable confidence that an employer will be able to meet its funding commitments, then the Fund will permit options such as stabilisation ([see 3.3 Note \(b\)](#)), a longer time horizon relative to other employers, and/or a lower likelihood of achieving their funding target. Such options will temporarily produce lower contribution levels than would otherwise have applied. This is permitted in the expectation that the employer will still be able to meet its obligations for many years to come.

On the other hand, where there is doubt that an employer will be able to meet its funding commitments or withstand a significant change in its commitments, then a higher funding target, and/or a shorter time horizon relative to other employers, and/or a higher likelihood of achieving the target may be required.

The Fund actively seeks employer input, including to its funding arrangements, through various means: see [Appendix A](#).

2.7 What approach has the Fund taken to dealing with uncertainty arising from McCloud court case and its potential impact on the LGPS Benefit structure?

The LGPS benefit structure from 1 April 2014 is currently under review following the Government's loss of the right to appeal the McCloud and other similar court cases. The courts have ruled that the 'transitional protections' awarded to some members of public service pension schemes when the schemes were reformed (on 1 April 2014 in the case of the LGPS) were unlawful on the grounds of age discrimination. At the time of writing, the Ministry of Housing, Communities and Local Government (MHCLG) has not provided any details of changes as a result of the case. However, it is expected that benefits changes will be required and they will likely increase the value of liabilities. At present, the scale and nature of any increase in liabilities are unknown, which limits the ability of the Fund to make an accurate allowance.

[The LGPS Scheme Advisory Board \(SAB\) issued advice to LGPS funds in May 2019.](#) As there was no finalised outcome of the McCloud case by 31 August 2019, the Fund Actuary has acted in line with SAB's advice and valued all member benefits in line with the current LGPS Regulations.

The Fund, in line with the advice in the SAB's note, has considered how to allow for this risk in the setting of employer contribution rates.

Uncertainty over the McCloud remedy impact makes it impossible to calculate an 'exact' loading so the Fund's preferred approach is to increase the likelihood of achieving the funding target over a particular time horizon by 5%. This will allow for an additional element of prudence and should mitigate the impact of any changes to benefits following the conclusion to the McCloud case. However, once the outcome of the McCloud case is known, the Fund may revisit the contribution rates set to ensure they remain appropriate.

The Fund has also considered the McCloud judgement in its approach to cessation valuations. Please see note (j) to table [3.3](#) for further information.

2.8 When will the next actuarial valuation be?

On 8 May 2019 MHCLG issued a consultation seeking views on (among other things) proposals to amend the LGPS valuation cycle in England and Wales from a three year (triennial) valuation cycle to a four year (quadrennial) valuation cycle.

On 7 October 2019 MHCLG confirmed the next LGPS valuation cycle in England and Wales will be 31 March 2022, regardless of the ongoing consultation. The Fund therefore instructed the Fund Actuary to certify contribution rates for employers for the period 1 April 2020 to 31 March 2023 as part of the 2019 valuation of the Fund.

3 Calculating contributions for individual Employers

3.1 General comments

A key challenge for the Administering Authority is to balance the need for stable, affordable employer contributions with the requirement to take a prudent, longer-term view of funding and ensure the solvency of the Fund. With this in mind, the Fund's three-step process identifies the key issues:

1. What is a suitably (but not overly) prudent funding target?
2. How long should the employer be permitted to reach that target? This should be realistic but not so long that the funding target is in danger of never actually being achieved.
3. What likelihood is required to reach that funding target? This will always be less than 100% as we cannot be certain of the future. Higher likelihood "bars" can be used for employers where the Fund wishes to reduce the risk that the employer ceases leaving a deficit to be picked up by other employers.

These and associated issues are covered in this Section.

The Administering Authority recognises that there may occasionally be particular circumstances affecting individual employers that are not easily managed within the rules and policies set out in the Funding Strategy Statement. Therefore the Administering Authority, reserves the right to direct the actuary to adopt alternative funding approaches on a case by case basis for specific employers.

3.2 The effect of paying lower contributions

In limited circumstances the Administering Authority may permit employers to pay contributions at a lower level than is assessed for the employer using the three step process above. At their absolute discretion the Administering Authority may:

- extend the time horizon for targeting full funding;
- adjust the required likelihood of meeting the funding target;
- permit an employer to participate in the Fund's stabilisation mechanisms;
- permit extended phasing in of contribution rises or reductions;
- pool contributions amongst employers with similar characteristics; and/or
- accept some form of security or guarantee in lieu of a higher contribution rate than would otherwise be the case.

Employers which are permitted to use one or more of the above methods will often be paying, for a time, contributions less than required to meet their funding target, over the appropriate time horizon with the required likelihood of success. Such employers should appreciate that:

- their true long term liability (i.e. the actual eventual cost of benefits payable to their employees and ex-employees) is not affected by the pace of paying contributions;
- lower contributions in the short term will result in a lower level of future investment returns on the employer's asset share. Thus, deferring a certain amount of contribution may lead to higher contributions in the long-term; and
- it may take longer to reach their funding target, all other things being equal.

Overleaf [\(3.3\)](#) is a summary of how the main funding policies differ for different types of employer, followed by more detailed notes where necessary.

[Section 3.4](#) onwards deals with various other funding issues which apply to all employers.

3.3 The different approaches used for different employers

Type of employer	Scheduled Bodies				Community Admission Bodies and Designating Employers		Transferee Admission Bodies*	Designating Bodies	
Sub-type	Local Authorities, Police and Crime Commissioner	Other Scheduled Bodies	Colleges	Academies	Open to new entrants	Closed to new entrants	(all)	Internal Drainage Boards, Parish and Town Councils	
Funding Target Basis used	Ongoing participation basis, assumes long-term Fund participation (see Appendix E)				Ongoing participation basis, but may move to “gilts exit basis” - see Note (a)		Contractor exit basis, assumes fixed contract term in the Fund (see Appendix E)	Ongoing, assumes long – term Fund participation (see Appendix E)	
Primary rate approach	(see Appendix D – D.2)								
Stabilised contribution rate?	Yes - see Note (b)	No	No	No	No	No	No	No	
Maximum time horizon – Note (c)	20 years	20 years	15 years	20 years	Outstanding term, subject to a maximum of 15 years	Outstanding term, subject to a maximum of 15 years	Outstanding contract term, subject to a maximum of 15 years	20 years	
Secondary rate – Note (d)	Monetary amount (other than maintained schools where % of payroll)	% of payroll	Monetary amount	Monetary amount	Monetary amount	Monetary amount	Monetary amount	Monetary amount or % of payroll where pooled	
Treatment of surplus	Covered by stabilisation	Preferred approach: contributions kept at Primary rate. However, reductions may be permitted by the Administering Authority					Preferred approach: contributions kept at		Preferred approach:

Type of employer	Scheduled Bodies				Community Admission Bodies and Designating Employers		Transferee Admission Bodies*	Designating Bodies	
	arrangement							Primary rate. However, reductions may be permitted by the Administering Authority to reduce the surplus over the remaining contract term	contributions kept at Primary rate. However, reductions may be permitted by the Administering Authority
Likelihood of achieving target – Note (e)	70%	80%	80%	80%	80%	80%	To be set on an employer by employer basis depending upon strength of covenant	75%	
Phasing of contribution changes	Covered by stabilisation arrangement	None	None	None	None	None	None	None	
Review of rates – Note (f)	Administering Authority reserves the right to review contribution rates and amounts, and the level of security provided, at regular intervals between valuations						Particularly reviewed in last 3 years of contract	Administering Authority reserves the right to review contribution rates and amounts, and the level of security provided, at regular intervals between valuations	
New employer	n/a	n/a	n/a	Note (g)	Note (h)		Notes (h) & (i)	n/a	

Type of employer	Scheduled Bodies				Community Admission Bodies and Designating Employers	Transferee Admission Bodies*	Designating Bodies
Cessation of participation: exit debt/credit payable	Cessation is assumed not to be generally possible, as Scheduled Bodies are legally obliged to participate in the LGPS. In the rare event of cessation occurring (machinery of Government changes for example), the cessation debt principles applied would be as per Note (j) .				Can be ceased subject to terms of admission agreement. Exit debt/credit will be calculated on a basis appropriate to the circumstances of cessation – see Note (j) .	Participation is assumed to expire at the end of the contract. Cessation debt/credit calculated on the contractor exit basis, unless the admission agreement is terminated early by the contractor in which case the low risk exit basis would apply. Letting employer will be liable for future deficits and contributions arising. See Note (j) for further details.	Can be ceased subject to passing of resolution. Cessation debt will be calculated on a basis appropriate to the circumstances of cessation - see Note (j) and 3.4 for small scheduled bodies pool.

* Where the Administering Authority recognises a fixed contribution rate agreement between a letting authority and a contractor, the certified employer contribution rate will be derived in line with the methodology specified in the risk sharing agreement. Additionally, in these cases, upon cessation the contractor’s assets and liabilities will transfer back to the letting employer with no crystallisation of any deficit or surplus. Further detail on fixed contribution rate agreements is set out in [note \(i\)](#).

Note (a) (Gilts exit basis for CABs and Designating Employers closed to new entrants)

In the circumstances where:

- the employer is a Designating Employer, or an Admission Body but not a Transferee Admission Body, and
- the employer has no guarantor, and
- the admission agreement is likely to terminate, or the employer is likely to lose its last active member, within a timeframe considered appropriate by the Administering Authority to prompt a change in funding,

the Administering Authority may set a higher funding target (e.g. based on the return from long-term gilt yields) by the time the agreement terminates or the last active member leaves, in order to protect other employers in the Fund. This policy will increase regular contributions and reduce, but not entirely eliminate, the possibility of a final deficit payment being required from the employer when a cessation valuation is carried out.

The Administering Authority also reserves the right to adopt the above approach in respect of those Designating Employers and Admission Bodies with no guarantor, where the strength of covenant is considered to be weak but there is no immediate expectation that the admission agreement will cease or the Designating Employer alters its designation.

Note (b) (Stabilisation)

Stabilisation is a mechanism where employer contribution rate variations from year to year are kept within a pre-determined range, thus allowing those employers' rates to be relatively stable. In the interests of stability and affordability of employer contributions, the Administering Authority, on the advice of the Fund Actuary, believes that stabilising contributions can still be viewed as a prudent longer-term approach. However, employers whose contribution rates have been "stabilised" (and may therefore be paying less than their theoretical contribution rate) should be aware of the risks of this approach and should consider making additional payments to the Fund if possible.

This stabilisation mechanism allows short term investment market volatility to be managed so as not to cause volatility in employer contribution rates, on the basis that a long term view can be taken on net cash inflow, investment returns and strength of employer covenant.

The current stabilisation mechanism applies if:

- the employer satisfies the eligibility criteria set by the Administering Authority (see below) and;
- there are no material events which cause the employer to become ineligible, e.g. significant reductions in active membership (due to outsourcing or redundancies), or changes in the nature of the employer (perhaps due to Government restructuring), or changes in the security of the employer.

On the basis of extensive modelling carried out for the 2019 valuation exercise (see [Section 4](#)), the standard stabilisation arrangements that will apply for employers are as follows. Other stabilisation arrangements may, on occasion, be allowed if the actuary considers them to be prudent.

Type of employer	Local Authority Council	Police and Crime Commissioner Pool
Stabilisation Mechanism	Fixed % of pay plus increasing monetary amount	Fixed % of pay plus increasing monetary amount
Maximum contribution increase per year	+1% of pay	+1% of pay
Maximum contribution decrease per year	-1% of pay	-1% of pay

The stabilisation criteria and limits will be reviewed at the next formal valuation. However the Administering Authority reserves the right to review the stabilisation criteria and limits at any time before then, on the basis of membership and/or employer changes as described above.

Note (c) (Maximum time horizon)

The maximum time horizon starts at the commencement of the revised contribution rate (1 April 2020 for the 2019 valuation). The Administering Authority would normally expect the same period to be used at successive triennial valuations, but would reserve the right to propose alternative time horizons, for example where there were no new entrants.

Note (d) (Secondary rate)

For employers where stabilisation is not being applied, the Secondary contribution rate for each employer, covering the period until the next formal valuation, will normally be set as a monetary amount. However, the Administering Authority reserves the right to amend these rates between formal valuations.

Note (e) (Likelihood of achieving funding target)

Each employer has its funding target calculated, and a relevant time horizon over which to reach that target. Contributions are set such that, combined with the employer's current asset share and anticipated market movements over the time horizon, the funding target is achieved with a given minimum likelihood. A higher required likelihood bar will give rise to higher required contributions, and vice versa.

The way in which contributions are set using these three steps, and relevant economic projections, is described in further detail in [Appendix D](#).

Different likelihoods are set for different employers depending on their nature and circumstances: in broad terms, a higher likelihood will apply due to one or more of the following:

- the Fund believes the employer poses a greater funding risk than other employers,
- the employer does not have tax-raising powers;
- the employer does not have a guarantor or other sufficient security backing its funding position; and/or
- the employer is likely to cease participation in the Fund in the short or medium term.

Note (f) (Regular Reviews)

Such reviews may be triggered by significant events including but not limited to: significant reductions in payroll, altered employer circumstances, Government restructuring affecting the employer's business, or failure to pay contributions or arrange appropriate security as required by the Administering Authority.

The result of a review may be to require increased contributions (by strengthening the actuarial assumptions adopted and/or moving to monetary levels of deficit recovery contributions), and/or an increased level of security or guarantee.

Note (g) (New Academy conversions)

At the time of writing, the Fund's policies on academies' funding issues are as follows:

- i. The new academy will be regarded as a separate employer in its own right and will not be pooled with other employers in the Fund. The only exception is where the academy is part of a Multi Academy Trust (MAT) in which case the academy's figures will be calculated as below but can be combined with, for the purpose of setting contribution rates, those of the other academies in the MAT;
- ii. The new academy's past service liabilities on conversion will be calculated based on its active Fund members on the day before conversion. For the avoidance of doubt, these liabilities will include all past service of those members, but will exclude the liabilities relating to any ex-employees of the school who have deferred or pensioner status;
- iii. The new academy will be allocated an initial asset share from the ceding council's assets in the Fund. This asset share will be calculated using the estimated funding position of the ceding council at the date of academy conversion. The share will be based on the active members' funding level, having first allocated assets in the council's share to fully fund deferred and pensioner members. The assets allocated to the academy will be limited if necessary so that its initial funding level is subject to a maximum of 100%. The asset allocation will be based on market conditions and the academy's active Fund membership on the day prior to conversion;
- iv. The new academy's calculated contribution rate will be based on the time horizon and likelihood of achieving funding target outlined for Academies in the table in Section [3.3](#) above;
- v. It is possible for an academy to leave one MAT and join another. If this occurs, all active, deferred and pensioner members of the academy transfer to the new MAT. If two MAT's merge during the inter-valuation period, the merged MAT will pay the higher certified rates for the individual MAT's.

The Fund's policies on academies are subject to change in the light of any amendments to MHCLG and/or DfE guidance or removal of the formal guarantee currently provided to academies by the DfE. Any changes will be notified to academies, and will be reflected in a subsequent version of this FSS.

Note (h) (New Admission Bodies)

With effect from 1 October 2012, the LGPS 2012 Miscellaneous Regulations introduced mandatory new requirements for all Admission Bodies brought into the Fund from that date. Under these Regulations, all new Admission Bodies will be required to provide some form of security, such as a guarantee from the letting employer, an indemnity or a bond. The security is required to cover some or all of the following:

- the strain cost of any redundancy early retirements resulting from the premature termination of the contract;
- allowance for the risk of asset underperformance;

- allowance for the risk of a greater than expected rise in liabilities;
- allowance for the possible non-payment of employer and member contributions to the Fund; and/or
- the current deficit.

Transferee Admission Bodies: For all TABs, the security must be to the satisfaction of the Administering Authority as well as the letting employer, and will be reassessed on an annual basis, or other basis agreed with the ceding employer. See also [Note \(i\)](#) below.

Community Admission Bodies: The Administering Authority will only consider requests from CABs (or other similar bodies, such as section 75 NHS partnerships) to join the Fund if they are sponsored by a Scheduled Body with tax raising powers, guaranteeing their liabilities and also providing a form of security as above.

The above approaches reduce the risk to other employers in the Fund of potentially having to pick up any shortfall in respect of Admission Bodies ceasing with an unpaid deficit.

Note (i) (New Transferee Admission Bodies)

A new TAB usually joins the Fund as a result of the letting/outsourcing of some services from an existing employer (normally a Scheduled Body such as a council or academy) to another organisation (a “contractor”). This involves the TUPE transfer of some staff from the letting employer to the contractor. Consequently, for the duration of the contract, the contractor is a new participating employer in the Fund so that the transferring employees maintain their eligibility for LGPS membership. At the end of the contract the employees revert to the letting employer or to a replacement contractor.

Ordinarily, the TAB would be set up in the Fund as a new employer with responsibility for all the accrued benefits of the transferring employees; in this case, the contractor would usually be assigned an initial asset allocation equal to the past service liability value of the employees’ Fund benefits. The quid pro quo is that the contractor is then expected to ensure that its share of the Fund is also fully funded at the end of the contract: see [Note \(j\)](#).

Employers which “outsource” have flexibility in the way that they can deal with the pension risk potentially taken on by the contractor. In particular there are three different routes that such employers may wish to adopt. Clearly as the risk ultimately resides with the employer letting the contract, it is for them to agree the appropriate route with the contractor:

i) Pooling

Under this option the contractor is pooled with the letting employer. In this case, the contractor may pay the same rate as the letting employer, which may be under a stabilisation approach.

ii) Letting employer retains pre-contract risks

Under this option the letting employer would retain responsibility for assets and liabilities in respect of service accrued prior to the contract commencement date. The contractor would be responsible for the future liabilities that accrue in respect of transferred staff. The contractor’s contribution rate could vary from one valuation to the next. It would be liable for any deficit (or entitled to any surplus) at the end of the contract term in respect of assets and liabilities attributable to service accrued during the contract term.

iii) Fixed contribution rate agreed

Under this option the contractor pays a fixed contribution rate throughout its participation in the Fund and on cessation does not pay any deficit or receive an exit credit. In other words, the pension risks “pass through” to the letting employer. The Administering Authority is willing to administer any of the above options as long as the approach is documented in the Admission Agreement as well as the transfer agreement. Any risk sharing agreement should ensure that some element of risk transfers to the contractor where it relates to their decisions and it is unfair to burden the letting employer with that risk. For example the contractor should typically be responsible for pension costs that arise from:

- above average pay increases, including the effect in respect of service prior to contract commencement even if the letting employer takes on responsibility for the latter under (ii) above; and
- redundancy and early retirement decisions.

Note (j) (Admission Bodies Ceasing)

Notwithstanding the provisions of the Admission Agreement, the Administering Authority may consider any of the following as triggers for the cessation of an admission agreement with any type of body:

- Last active member ceasing participation in the Fund (NB recent LGPS Regulation changes mean that the Administering Authority has the discretion to defer taking action for up to three years, so that if the employer acquires one or more active Fund members during that period then cessation is not triggered. The current Fund policy is that this is left as a discretion and may or may not be applied in any given case);
- The insolvency, winding up or liquidation of the Admission Body;
- Any breach by the Admission Body of any of its obligations under the Agreement that they have failed to remedy to the satisfaction of the Fund;
- A failure by the Admission Body to pay any sums due to the Fund within the period required by the Fund; or
- The failure by the Admission Body to renew or adjust the level of the bond or indemnity, or to confirm an appropriate alternative guarantor, as required by the Fund.

On cessation, the Administering Authority will instruct the Fund actuary to carry out a cessation valuation to determine whether there is any deficit or surplus. Where there is a deficit, payment of this amount in full would normally be sought from the Admission Body; where there is a surplus, following the LGPS (Amendment) Regulations 2018 which came into effect on 14th May 2018, this will normally result in an exit credit payment to the Admission Body. If a risk-sharing agreement has been put in place (please see [note \(i\)](#) above) no cessation debt or exit credit may be payable, depending on the terms of the agreement.

As discussed in Section 2.7, the LGPS benefit structure from 1 April 2014 is currently under review following the Government’s loss of the right to appeal the McCloud and other similar court cases. The Fund has considered how it will reflect the current uncertainty regarding the outcome of this judgement in its approach to cessation valuations. For cessation valuations that are carried out before any changes to the LGPS benefit structure (from 1 April 2014) are confirmed, the Fund’s policy is that the actuary will make adjustments to the liability valuation, at individual member level, of the post 2014 benefit accrual, as an estimate of the possible impact of resulting benefit changes.

The Fund Actuary charges a fee for carrying out an employer’s cessation valuation, and there will be other Fund administration expenses associated with the cessation which the Fund will recharge to the employer. For the purposes of the cessation valuation, this fee will be treated as an expense incurred by the employer and will be deducted from the employer’s cessation surplus or added to the employer’s cessation deficit, as appropriate.

This process improves administrative efficiency as it reduces the number of transactions required to be made between the employer and the Fund following an employer's cessation. For non-Transferee Admission Bodies whose participation is voluntarily ended either by themselves or the Fund, or where a cessation event has been triggered, the Administering Authority must look to protect the interests of other ongoing employers. The actuary will therefore adopt an approach which, to the extent reasonably practicable, protects the other employers from the likelihood of any material loss emerging in future:

- (a) Where a guarantor does not exist then, in order to protect other employers in the Fund, the cessation liabilities and final surplus/deficit will normally be calculated using a "gilts exit basis", which is more prudent than the ongoing participation basis. This has no allowance for potential future investment outperformance above gilt yields, and has added allowance for future improvements in life expectancy. This could give rise to significant cessation debts being required.
- (b) Where there is a guarantor for future deficits and contributions, the details of the guarantee will be considered prior to the cessation valuation being carried out. In some cases the guarantor is simply guarantor of last resort and therefore the cessation valuation will be carried out consistently with the approach taken had there been no guarantor in place. Alternatively, where the guarantor is not simply guarantor of last resort, the cessation may be calculated using the ongoing participation basis or contractor exit basis as described in [Appendix E](#);
- (c) Again, depending on the nature of the guarantee, it may be possible to simply transfer the former Admission Body's liabilities and assets to the guarantor, without needing to crystallise any deficit or surplus. This approach may be adopted where the employer cannot pay the contributions due, and this is within the terms of the guarantee.

Under (a) and (b), any shortfall would usually be levied on the departing Admission Body as a single lump sum payment. If this is not possible then the Fund may spread the payment subject to there being some security in place for the employer such as a bond indemnity or guarantee.

In the event that the Fund is not able to recover the required payment in full, then the unpaid amounts fall to be shared amongst all of the other employers in the Fund. This may require an immediate revision to the Rates and Adjustments Certificate affecting other employers in the Fund, or instead be reflected in the contribution rates set at the next formal valuation following the cessation date.

As an alternative, where the ceasing Admission Body is continuing in business, the Fund at its absolute discretion reserves the right to enter into an agreement with the ceasing Admission Body. Under this agreement the Fund would accept an appropriate alternative security to be held against any deficit on the gilts exit basis, and would carry out the cessation valuation on the ongoing participation basis. Secondary contributions would be derived from this cessation debt. This approach would be monitored as part of each formal valuation and Secondary contributions would be reassessed as required. The Admission Body may terminate the agreement only via payment of the outstanding debt assessed on the gilts exit basis. Furthermore, the Fund reserves the right to revert to the "gilts exit basis" and seek immediate payment of any funding shortfall identified. The Administering Authority may need to seek legal advice in such cases, as the Admission Body would have no contributing members.

3.4 Pooled contributions

From time to time, with the advice of the Actuary, the Administering Authority may set up pools for employers with similar or complementary characteristics. This will always be in line with its broader funding strategy. Currently the pools in place within the Fund are as follows:

- Schools generally are also pooled with their funding Council. However there may be exceptions for specialist or independent schools.
- Smaller Transferee Admission Bodies may be pooled with the letting employer, provided all parties (particularly the letting employer) agree.
- Academies will be regarded as separate employers in their own right and will not be pooled with other employers in the Fund, the only exception being when the Academy is part of a Multi Academy Trust (MAT) and they have chosen to pool.

The intention of the pool is to minimise contribution rate volatility which would otherwise occur when members join, leave, take early retirement, receive pay rises markedly different from expectations, etc. Such events can cause large changes in contribution rates for very small employers in particular, unless these are smoothed out for instance by pooling across a number of employers.

On the other hand it should be noted that the employers in the pool will still have their own individual funding positions tracked by the Actuary, so that some employers will be much better funded, and others much more poorly funded, than the pool average. This therefore means that if any given employer was funding on a stand-alone basis, as opposed to being in the pool, then its contribution rate could be much higher or lower than the pool contribution rate.

It should also be noted that, if an employer is considering ceasing from the Fund, its required contributions would be based on its own funding position (rather than the pool average), and the cessation terms would also apply: this would mean potentially very different (and in particular possibly much higher) contributions would be required from the employer in that situation.

Employers who are permitted to enter (or remain in) a pool at the 2019 valuation will not normally be advised of their individual contribution rate unless agreed by the Administering Authority.

Community Admission Bodies that are deemed by the Administering Authority to have closed to new entrants are not usually permitted to participate in a pool.

Those employers which have been pooled are identified in the Rates and Adjustments Certificate. As at the 2019 valuation, separate pools were operated for:-

- Lincolnshire County Council;
- Police and Crime Commissioner for Lincolnshire;
- Lindsey Marsh Internal Drainage Board;
- Parish and Town Councils;
- The following Multi Academy Trusts:-
 - David Ross Education Trust
 - Boston Witham Academies Trust
 - Priory Federation of Academies
 - Tall Oaks Academy Trust
 - West Grantham Federation.

- CIT Academies
- Horncastle Education Trust

Where an academy or school joins an existing MAT with a pooled rate, it will be given the primary rate of the MAT, subject to breaching any materiality level in membership increase. If the membership increase is considered to be material, the Fund has the discretion to require an interim valuation of the expanded MAT to be calculated. Any secondary rate attributable to the academy or school will be required to be paid in addition to any existing secondary rate of the MAT. The Fund has the discretion to negate the need for an increase to the secondary rate if the MAT is considered to be sufficiently in surplus at the last valuation.

Small Scheduled Bodies Pool

In addition to the pools mentioned above, there is a small scheduled body pool made up of the Town and Parish Council's within the Fund. Given that these generally have very few members, this is a way of sharing experience and smoothing out the effects of costly but relatively rare events such as ill-health retirements or deaths in service.

All employers within this pool will have the same contribution rate and individual employer assets and liabilities will not be tracked. The member experience across the pool will be shared.

It should also be noted that, if an employer, who is in the Small Scheduled Body Pool, is considering ceasing from the Fund, the leaving employer's required exit credit/debit to the Fund will be calculated on the ongoing funding position of the pool at the date of the leaving employer's cessation date.

3.5 Additional flexibility in return for added security

The Administering Authority may permit greater flexibility to the employer's contributions if the employer provides added security to the satisfaction of the Administering Authority.

Such flexibility includes a reduced rate of contribution, an extended time horizon, or permission to join a pool with another body (e.g. the Local Authority).

Such security may include, but is not limited to, a suitable bond, a legally-binding guarantee from an appropriate third party, or security over an employer asset of sufficient value.

The degree of flexibility given may take into account factors such as:

- the extent of the employer's deficit;
- the amount and quality of the security offered;
- the employer's financial security and business plan; and
- whether the admission agreement is likely to be open or closed to new entrants.

3.6 Non ill health early retirement costs

It is assumed that members' benefits are payable from the earliest age that the employee could retire without incurring a reduction to their benefit (and without requiring their employer's consent to retire). (NB the relevant age may be different for different periods of service, following the benefit changes from April 2008 and April 2014). Employers are required to pay additional contributions ('strain') wherever an employee retires before attaining this age. The actuary's funding basis makes no allowance for premature retirement except on grounds of ill-health.

It is generally expected that such strain costs are paid immediately, however, in exceptional circumstances and with the agreement of the Administering Authority, the payment may be spread.

3.7 Ill health early retirement costs

In the event of a member's early retirement on the grounds of ill-health, a funding strain will usually arise, which can be very large. Such strains are currently met by each employer, although individual employers may elect to take external insurance (see [3.8](#) below).

3.8 External Ill health insurance

If an employer provides satisfactory evidence to the Administering Authority of a current external insurance policy covering ill health early retirement strains, then:

- the employer's contribution to the Fund each year is reduced by the amount of that year's insurance premium, so that employer's total outlay (pension contribution plus insurance premium) is unchanged, and
- there is no need for monitoring of allowances.

When an active member retires on ill health early retirement the claim amount will be paid directly from the insurer to the insured employer. This amount should then be paid to the Fund to allow the employer's asset share to be credited.

The employer must keep the Administering Authority notified of any changes in the insurance policy's coverage or premium terms, or if the policy is ceased.

3.9 Employers with no remaining active members

In general, an employer ceasing in the Fund due to the departure of the last active member will pay a cessation debt or receive an exit credit on an appropriate basis (see [3.3](#), [Note \(j\)](#)) and consequently have no further obligation to the Fund. Thereafter it is expected that one of two situations will eventually arise:

- a) The employer's asset share runs out before all its ex-employees' benefits have been paid. In this situation the other Fund employers will be required to contribute to pay all remaining benefits: this will be done by the Fund actuary apportioning the remaining liabilities on a pro-rata basis at successive formal valuations;
- b) The last ex-employee or dependant dies before the employer's asset share has been fully utilised. In this situation the remaining assets would be apportioned pro-rata by the Fund's actuary to the other Fund employers.
- c) In exceptional circumstances the Fund may permit an employer with no remaining active members and a cessation deficit to continue contributing to the Fund. This would require the provision of a suitable security or guarantee, as well as a written ongoing commitment to fund the remainder of the employer's obligations over an appropriate period. The Fund would reserve the right to invoke the cessation requirements in the future, however. The Administering Authority may need to seek legal advice in such cases, as the employer would have no contributing members.

3.10 Policies on bulk transfers

Each case will be treated on its own merits, but in general:

- The Fund will not pay bulk transfers greater than the lesser of (a) the asset share of the transferring employer in the Fund, and (b) the value of the past service liabilities of the transferring members;
- The Fund will not grant added benefits to members bringing in entitlements from another Fund unless the asset transfer is sufficient to meet the added liabilities; and
- The Fund may permit shortfalls to arise on bulk transfers if the Fund employer has suitable strength of covenant and commits to meeting that shortfall in an appropriate period. This may require the employer's Fund contributions to increase between valuations.

4 Funding strategy and links to investment strategy

4.1 What is the Fund's investment strategy?

The Fund has built up assets over the years, and continues to receive contribution and other income. All of this must be invested in a suitable manner, which is the investment strategy.

Investment strategy is set by the Administering Authority, after consultation with the employers and after taking investment advice. The precise mix, manager make up and target returns are set out in the Investment Strategy Statement which is available to members and employers.

The investment strategy is set for the long-term, but is reviewed from time to time. Normally a full review is carried out as part of each actuarial valuation, and is kept under review annually between actuarial valuations to ensure that it remains appropriate to the Fund's liability profile.

The same investment strategy is currently followed for all employers.

4.2 What is the link between funding strategy and investment strategy?

The Fund must be able to meet all benefit payments as and when they fall due. These payments will be met by contributions (resulting from the funding strategy) or asset returns and income (resulting from the investment strategy). To the extent that investment returns or income fall short, then higher cash contributions are required from employers, and vice versa.

Therefore, the funding and investment strategies are inextricably linked.

4.3 How does the funding strategy reflect the Fund's investment strategy?

In the opinion of the Fund actuary, the current funding policy is consistent with the current investment strategy of the Fund. The actuary's assumptions for future investment returns (described in Appendix E) are based on the current benchmark investment strategy of the Fund. The future investment return assumptions underlying each of the fund's three funding bases include a margin for prudence, and are therefore also considered to be consistent with the requirement to take a "prudent longer-term view" of the funding of liabilities as required by the UK Government (see Appendix [A1](#)).

In the short term – such as the three yearly assessments at formal valuations – there is the scope for considerable volatility in asset values. However, the actuary takes a long term view when assessing employer contribution rates and the contribution rate setting methodology takes into account this potential variability. The Fund does not hold a contingency reserve to protect it against the volatility of equity investments.

4.4 Does the Fund monitor its overall funding position?

The Administering Authority monitors the relative funding position, i.e. changes in the relationship between asset values and the liabilities value, quarterly. It reports this to the quarterly Pensions Committee meetings, and these papers are public documents that can be viewed on the Administering Authorities website.

5 Statutory reporting and comparison to other LGPS Funds

5.1 Purpose

Under Section 13(4)(c) of the Public Service Pensions Act 2013 (“Section 13”), the Government Actuary’s Department must, following each triennial actuarial valuation, report to the Ministry of Housing, Communities & Local Government (MHCLG) on each of the LGPS Funds in England & Wales. This report will cover whether, for each Fund, the rate of employer contributions are set at an appropriate level to ensure both the solvency and the long term cost efficiency of the Fund.

This additional MHCLG oversight may have an impact on the strategy for setting contribution rates at future valuations.

5.2 Solvency

For the purposes of Section 13, the rate of employer contributions shall be deemed to have been set at an appropriate level to ensure solvency if:

- (a) the rate of employer contributions is set to target a funding level for the Fund of 100%, over an appropriate time period and using appropriate actuarial assumptions (where appropriateness is considered in both absolute and relative terms in comparison with other funds); and either
- (b) employers collectively have the financial capacity to increase employer contributions, and/or the Fund is able to realise contingent assets should future circumstances require, in order to continue to target a funding level of 100%; or
- (c) there is an appropriate plan in place should there be, or if there is expected in future to be, a material reduction in the capacity of fund employers to increase contributions as might be needed.

5.3 Long Term Cost Efficiency

The rate of employer contributions shall be deemed to have been set at an appropriate level to ensure long term cost efficiency if:

- i. the rate of employer contributions is sufficient to make provision for the cost of current benefit accrual,
- ii. with an appropriate adjustment to that rate for any surplus or deficit in the Fund.

In assessing whether the above condition is met, MHCLG may have regard to various absolute and relative considerations. A relative consideration is primarily concerned with comparing LGPS pension funds with other LGPS pension funds. An absolute consideration is primarily concerned with comparing Funds with a given objective benchmark.

Relative considerations include:

1. the implied deficit recovery period; and
2. the investment return required to achieve full funding after 20 years.

Absolute considerations include:

1. the extent to which the contributions payable are sufficient to cover the cost of current benefit accrual and the interest cost on any deficit;
2. how the required investment return under “relative considerations” above compares to the estimated future return being targeted by the Fund’s current investment strategy;
3. the extent to which contributions actually paid have been in line with the expected contributions based on the extant rates and adjustment certificate; and
4. the extent to which any new deficit recovery plan can be directly reconciled with, and can be demonstrated to be a continuation of, any previous deficit recovery plan, after allowing for actual Fund experience.

MHCLG may assess and compare these metrics on a suitable standardised market-related basis, for example where the local funds’ actuarial bases do not make comparisons straightforward.

Appendix A – Regulatory framework

A1 Why does the Fund need an FSS?

The Ministry of Housing, Communities and Local Government (MHCLG) has stated that the purpose of the FSS is:

*“to establish a **clear and transparent fund-specific strategy** which will identify how employers’ pension liabilities are best met going forward;*

*to support the regulatory framework to maintain **as nearly constant employer contribution rates as possible**;*
and

*to take a **prudent longer-term view** of funding those liabilities.”*

These objectives are desirable individually, but may be mutually conflicting.

The requirement to maintain and publish a FSS is contained in LGPS Regulations which are updated from time to time. In publishing the FSS the Administering Authority has to have regard to any guidance published by Chartered Institute of Public Finance and Accountancy (CIPFA) (most recently in 2016) and to its Investment Strategy Statement.

This is the framework within which the Fund’s actuary carries out triennial valuations to set employers’ contributions and provides recommendations to the Administering Authority when other funding decisions are required, such as when employers join or leave the Fund. The FSS applies to all employers participating in the Fund.

A2 Does the Administering Authority consult anyone on the FSS?

Yes. This is required by LGPS Regulations. It is covered in more detail by the most recent CIPFA guidance, which states that the FSS must first be subject to “consultation with such persons as the authority considers appropriate”, and should include “a meaningful dialogue at officer and elected member level with council tax raising authorities and with corresponding representatives of other participating employers”.

In practice, for the Fund, the consultation process for this FSS was as follows:

- a) A draft version of the FSS was issued to all participating employers in November 2019 for comment;
- b) Comments were requested by 20 December, and answers provided;
- c) There was an Employers Forum on 4 March 2020 at which questions regarding the FSS could be raised and answered;
- d) Following the end of the consultation period the FSS was updated where required and approved at the Pensions Committee meeting on 19 March 2020, then published before the month end.

A3 How is the FSS published?

The FSS is made available through the following routes:

Published on the shared website, at www.wypf.org.uk;

A copy sent by e-mail to each participating employer in the Fund;

A copy sent to the Pension Board;

A full copy included in the annual report and accounts of the Fund;

Copies made available on request.

A4 How often is the FSS reviewed?

The FSS is reviewed in detail at least every three years as part of the triennial valuation (which may move to every four years in future – see Section 2.8). This version is expected to remain unaltered until it is consulted upon as part of the formal process for the next valuation.

It is possible that (usually slight) amendments may be needed within the three year period. These would be needed to reflect any regulatory changes, or alterations to the way the Fund operates (e.g. to accommodate a new class of employer). Any such amendments would be consulted upon as appropriate:

- trivial amendments would be simply notified at the next round of employer communications,
- amendments affecting only one class of employer would be consulted with those employers,
- other more significant amendments would be subject to full consultation.

In any event, changes to the FSS would need agreement by the Pensions Committee and would be included in the relevant Committee Meeting minutes.

A5 How does the FSS fit into other Fund documents?

The FSS is a summary of the Fund's approach to funding liabilities. It is not an exhaustive statement of policy on all issues, for example there are a number of separate statements published by the Fund including the Investment Strategy Statement, Governance Strategy and Communications Strategy. In addition, the Fund publishes an Annual Report and Accounts with up to date information on the Fund.

These documents can be found on the shared website at www.wypf.org.uk.

Appendix B – Responsibilities of key parties

The efficient and effective operation of the Fund needs various parties to each play their part.

B1 The Administering Authority should:-

- operate the Fund as per the LGPS Regulations;
- effectively manage any potential conflicts of interest arising from its dual role as Administering Authority and a Fund employer;
- collect employer and employee contributions, and investment income and other amounts due to the Fund;
- ensure that cash is available to meet benefit payments as and when they fall due;
- pay from the Fund the relevant benefits and entitlements that are due;
- invest surplus monies (i.e. contributions and other income which are not immediately needed to pay benefits) in accordance with the Fund's Investment Strategy Statement (ISS) and LGPS Regulations;
- communicate appropriately with employers so that they fully understand their obligations to the Fund;
- take appropriate measures to safeguard the Fund against the consequences of employer default;
- manage the valuation process in consultation with the Fund's actuary;
- provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see [Section 5](#));
- prepare and maintain a FSS and an ISS, after consultation;
- notify the Fund's actuary of material changes which could affect funding (this is covered in a separate agreement with the actuary); and
- monitor all aspects of the fund's performance and funding and amend the FSS and ISS as necessary and appropriate.

B2 The Individual Employer should:-

- deduct contributions from employees' pay correctly;
- pay all contributions, including their own as determined by the actuary, and submit accurate data submissions promptly by the due date;
- have a policy and exercise discretions within the regulatory framework;
- make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits, early retirement strain; and
- notify the Administering Authority promptly of all changes to its circumstances, prospects or membership, which could affect future funding.

B3 The Fund Actuary should:-

- prepare valuations, including the setting of employers' contribution rates. This will involve agreeing assumptions with the Administering Authority, having regard to the FSS and LGPS Regulations, and targeting each employer's solvency appropriately;
- provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see [Section 5](#));

- provide advice relating to new employers in the Fund, including the level and type of bonds or other forms of security (and the monitoring of these);
- prepare advice and calculations in connection with bulk transfers and individual benefit-related matters;
- assist the Administering Authority in considering possible changes to employer contributions between formal valuations, where circumstances suggest this may be necessary;
- advise on the termination of employers' participation in the Fund; and
- fully reflect actuarial professional guidance and requirements in the advice given to the Administering Authority.

B4 Other parties:-

- investment advisers (either internal or external) should ensure the Fund's ISS remains appropriate, and consistent with this FSS;
- investment managers, custodians and bankers should all play their part in the effective investment (and dis-investment) of Fund assets, in line with the ISS;
- auditors should comply with their auditing standards, ensure Fund compliance with all requirements, monitor and advise on fraud detection, and sign off annual reports and financial statements as required;
- governance advisers may be appointed to advise the Administering Authority on efficient processes and working methods in managing the Fund;
- legal advisers (either internal or external) should ensure the Fund's operation and management remains fully compliant with all regulations and broader local government requirements, including the Administering Authority's own procedures;
- MHCLG (assisted by the Government Actuary's Department) and the Scheme Advisory Board, should work with LGPS Funds to meet Section 13 requirements.

Appendix C – Key risks and controls

C1 Types of risk

The Administering Authority has an active risk management programme in place. The measures that it has in place to control key risks are summarised below under the following headings:

- financial;
- demographic;
- regulatory; and
- governance.

C2 Financial risks

Risk	Summary of Control Mechanisms
Fund assets fail to deliver returns in line with the anticipated returns underpinning the valuation of liabilities and contribution rates over the long-term.	<p>Only anticipate long-term returns on a relatively prudent basis to reduce risk of under-performing.</p> <p>Assets invested on the basis of specialist advice, in a suitably diversified manner across asset classes, geographies, managers, etc.</p> <p>Analyse progress at three yearly valuations for all employers.</p> <p>Inter-valuation roll-forward of liabilities between valuations at whole Fund level.</p>
Inappropriate long-term investment strategy.	<p>Overall investment strategy options considered as an integral part of the funding strategy. Used asset liability modelling to measure 4 key outcomes.</p> <p>Chosen option considered to provide the best balance.</p>
Active investment manager under-performance relative to benchmark.	<p>Quarterly investment monitoring analyses market performance and active managers relative to their index benchmark.</p>
Pay and price inflation significantly more than anticipated.	<p>The focus of the actuarial valuation process is on real returns on assets, net of price and pay increases.</p> <p>Inter-valuation monitoring, as above, gives early warning.</p> <p>Some investment in bonds also helps to mitigate this risk.</p> <p>Employers pay for their own salary awards and should be mindful of the geared effect on pension liabilities of any bias in pensionable pay rises towards longer-serving employees.</p>

Risk	Summary of Control Mechanisms
Effect of possible increase in employer's contribution rate on service delivery and admission/scheduled bodies	An explicit stabilisation mechanism has been agreed as part of the funding strategy. Other measures are also in place to limit sudden increases in contributions.
Orphaned employers give rise to added costs for the Fund	<p>The Fund seeks a cessation debt (or security/guarantor) to minimise the risk of this happening in the future.</p> <p>If it occurs, the Actuary calculates the added cost spread pro-rata among all employers – (see 3.9).</p>
Effect of possible asset underperformance as a result of climate change	The Fund has a responsible investment policy and works with external managers to minimise the investment risk through stock selection and engagement.

C3 Demographic risks

Risk	Summary of Control Mechanisms
Pensioners living longer, thus increasing cost to Fund.	<p>Set mortality assumptions with some allowance for future increases in life expectancy.</p> <p>The Fund Actuary has direct access to the experience of over 50 LGPS funds which allows early identification of changes in life expectancy that might in turn affect the assumptions underpinning the valuation.</p>
Maturing Fund – i.e. proportion of actively contributing employees declines relative to retired employees.	Continue to monitor at each valuation, monetary amounts to be continued to be paid rather than % of pay and consider alternative investment strategies.
Deteriorating patterns of early retirements	<p>Employers are charged the extra cost of non ill-health retirements following each individual decision.</p> <p>Employer ill health retirement experience is monitored, and insurance is an option.</p>
Reductions in payroll causing insufficient deficit recovery payments	<p>In many cases this may not be sufficient cause for concern, and will in effect be caught at the next formal valuation. However, there are protections where there is concern, as follows:</p> <p>Employers in the stabilisation mechanism may be brought out of that mechanism to permit appropriate contribution increases (see Note (b) to 3.3).</p> <p>For other employers, review of contributions is permitted in general between valuations (see Note (f)</p>

Risk	Summary of Control Mechanisms
	to 3.3) and may require a move in deficit contributions from a percentage of payroll to fixed monetary amounts.

C4 Regulatory risks

Risk	Summary of Control Mechanisms
Changes to national pension requirements and/or HMRC rules e.g. changes arising from public sector pensions reform.	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>The Administering Authority is monitoring the progress on the McCloud court case and will consider an interim valuation or other appropriate action once more information is known.</p> <p>The government's long term preferred solution to GMP indexation and equalisation - conversion of GMPs to scheme benefits - was built into the 2019 valuation.</p>
Time, cost and/or reputational risks associated with any MHCLG intervention triggered by the Section 13 analysis (see Section 5).	Take advice from Fund Actuary on position of Fund as at prior valuation, and consideration of proposed valuation approach relative to anticipated Section 13 analysis.
Changes by Government to particular employer participation in LGPS Funds, leading to impacts on funding and/or investment strategies.	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>Take advice from Fund Actuary on impact of changes on the Fund and amend strategy as appropriate.</p>

C5 Governance risks

Risk	Summary of Control Mechanisms
<p>Administering Authority unaware of structural changes in an employer's membership (e.g. large fall in employee members, large number of retirements) or not advised of an employer closing to new entrants.</p>	<p>The Administering Authority has a close relationship with employing bodies and communicates required standards e.g. for submission of data.</p> <p>The Actuary may revise the rates and Adjustments certificate to increase an employer's contributions between triennial valuations</p> <p>Deficit contributions may be expressed as monetary amounts.</p>
<p>Actuarial or investment advice is not sought, or is not heeded, or proves to be insufficient in some way</p>	<p>The Administering Authority maintains close contact with its specialist advisers.</p> <p>Advice is delivered via formal meetings involving Elected Members, and recorded appropriately.</p> <p>Actuarial advice is subject to professional requirements such as peer review.</p>
<p>Administering Authority failing to commission the Fund Actuary to carry out a termination valuation for a departing Admission Body.</p>	<p>The Administering Authority requires employers with Best Value contractors to inform it of forthcoming changes.</p> <p>Community Admission Bodies' memberships are monitored and, if active membership decreases, steps will be taken.</p>
<p>An employer ceasing to exist with insufficient funding or adequacy of a bond.</p>	<p>The Administering Authority believes that it would normally be too late to address the position if it was left to the time of departure.</p> <p>The risk is mitigated by:</p> <p>Seeking a funding guarantee from another scheme employer, or external body, where-ever possible (see Notes (h) and (j) to 3.3).</p> <p>Alerting the prospective employer to its obligations and encouraging it to take independent actuarial advice.</p> <p>Vetting prospective employers before admission.</p> <p>Where permitted under the regulations requiring a bond to protect the Fund from various risks.</p> <p>Requiring new Community Admission Bodies to have a guarantor.</p> <p>Reviewing bond or guarantor arrangements at regular</p>

Risk	Summary of Control Mechanisms
	intervals (see Note (f) to 3.3). Reviewing contributions well ahead of cessation if thought appropriate (see Note (a) to 3.3).
An employer ceasing to exist resulting in an exit credit being payable	The Administering Authority regularly monitors admission bodies coming up to cessation The Administering Authority invests in liquid assets to ensure that exit credits can be paid when required.

Appendix D – The calculation of Employer contributions

In [Section 2](#) there was a broad description of the way in which contribution rates are calculated. This Appendix considers these calculations in much more detail.

As discussed in [Section 2](#), the actuary calculates the required contribution rate for each employer using a three-step process:

- Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See [Appendix E](#) for more details of what assumptions we make to determine that funding target;
- Determine the time horizon over which the employer should aim to achieve that funding target. See the table in [3.3](#) and [Note \(c\)](#) for more details;
- Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See the table in [3.3 Note \(e\)](#) for more details.

The calculations involve actuarial assumptions about future experience, and these are described in detail in [Appendix E](#).

D1 What is the difference between calculations across the whole Fund and calculations for an individual employer?

Employer contributions are normally made up of two elements:

- a) the estimated cost of ongoing benefits being accrued, referred to as the "Primary contribution rate" (see [D2](#) below); plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "Secondary contribution rate" (see [D3](#) below).

The contribution rate for each employer is measured as above, appropriate for each employer's assets, liabilities and membership. The whole Fund position, including that used in reporting to MHCLG (see section 5), is calculated in effect as the sum of all the individual employer rates. MHCLG currently only regulates at whole Fund level, without monitoring individual employer positions.

D2 How is the Primary contribution rate calculated?

The Primary element of the employer contribution rate is calculated with the aim that these contributions will meet benefit payments in respect of members' **future** service in the Fund. This is based upon the cost (in excess of members' contributions) of the benefits which employee members earn from their service each year.

The Primary rate is calculated separately for all the employers, although employers within a pool will pay the contribution rate applicable to the pool as a whole. The Primary rate is calculated such that it is projected to:

1. meet the required funding target for all future years' accrual of benefits*, excluding any accrued assets,
2. within the determined time horizon (see [note 3.3 Note \(c\)](#) for further details),

3. with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see [3.3 Note \(e\)](#) for further details).

* The projection is for the current active membership where the employer no longer admits new entrants, or additionally allows for new entrants where this is appropriate.

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund's actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in [Appendix E](#). The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

The approach includes expenses of administration to the extent that they are borne by the Fund, and includes allowances for benefits payable on death in service and on ill health retirement.

D3 How is the Secondary contribution rate calculated?

The Fund aims for the employer to have assets sufficient to meet 100% of its accrued liabilities at the end of its funding time horizon based on the employer's funding target assumptions (see [Appendix E](#)).

The Secondary rate is calculated as the balance over and above the Primary rate, such that the total contribution rate is projected to:

- meet the required funding target relating to combined past and future service benefit accrual, including accrued asset share (see [D5](#) below)
- at the end of the determined time horizon (see [3.3 Note \(c\)](#) for further details)
- with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see [3.3 Note \(e\)](#) for further details).

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund Actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in [Appendix E](#). The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

D4 What affects a given employer's valuation results?

The results of these calculations for a given individual employer will be affected by:

1. past contributions relative to the cost of accruals of benefits;
2. different liability profiles of employers (e.g. mix of members by age, gender, service vs. salary);
3. the effect of any differences in the funding target, i.e. the valuation basis used to value the employer's liabilities at the end of the time horizon;
4. any different time horizons;
5. the difference between actual and assumed rises in pensionable pay;
6. the difference between actual and assumed increases to pensions in payment and deferred pensions;
7. the difference between actual and assumed retirements on grounds of ill-health from active status;
8. the difference between actual and assumed amounts of pension ceasing on death;

9. the additional costs of any non ill-health retirements relative to any extra payments made; and/or
10. differences in the required likelihood of achieving the funding target.

D5 How is each employer's asset share calculated?

The Administering Authority does not operate bank accounts or investment mandates for each employer. Therefore it cannot account for each employer's assets separately. Instead, the Fund actuary must apportion the assets of the whole Fund between the individual employers. There are broadly two ways to do this;

- 1) A technique known as "analysis of surplus" in which the Fund actuary estimates the surplus/deficit of an employer at the current valuation date by analysing movements in the surplus/deficit from the previous actuarial valuation date. The estimated surplus/deficit is compared to the employer's liability value to calculate the employer's asset value. The actuary will quantify the impact of investment, membership and other experience to analyse the movement in the surplus/deficit. This technique makes a number of simplifying assumptions due to the unavailability of certain items of information. This leads to a balancing, or miscellaneous, item in the analysis of surplus, which is split between employers in proportion to their asset shares.
- 2) A 'cashflow approach' in which an employer's assets are tracked over time allowing for cashflows paid in (contributions, transfers in etc.), cashflows paid out (benefit payments, transfers out etc.) and investment returns on the employer's assets.

Until 31 March 2016 the Administering Authority used the 'analysis of surplus' approach to apportion the Fund's assets between individual employers.

Since then, the Fund has adopted a cashflow approach for tracking individual employer assets.

The Fund Actuary uses the Hymans Robertson's proprietary "HEAT" system to track employer assets on a monthly basis. Starting with each employer's assets from the previous month end, cashflows paid in/out and investment returns achieved on the Fund's assets over the course of the month are added to calculate an asset value at the month end.

The Fund is satisfied that this new approach provides the most accurate asset allocations between employers that is reasonably possible at present.

D6 How does the Fund adjust employer asset shares when an individual member moves from one employer in the Fund to another?

Under the cashflow approach for tracking employer asset shares, the Fund has allowed for any individual members transferring from one employer in the Fund to another, via the transfer of a sum from the ceding employer's asset share to the receiving employer's asset share. This sum is equal to the member's Cash Equivalent Transfer Value (CETV) as advised by the Fund's administrators.

Appendix E – Actuarial assumptions

E1 What are the actuarial assumptions used to calculate employer contribution rates?

These are expectations of future experience used to place a value on future benefit payments (“the liabilities”) and future asset values. Assumptions are made about the amount of benefit payable to members (the financial assumptions) and the likelihood or timing of payments (the demographic assumptions). For example, financial assumptions include investment returns, salary growth and pension increases; demographic assumptions include life expectancy, probabilities of ill-health early retirement, and proportions of member deaths giving rise to dependants’ benefits.

Changes in assumptions will affect the funding target and required contribution rate. However, different assumptions will not of course affect the actual benefits payable by the Fund in future.

The actuary’s approach to calculating employer contribution rates involves the projection of each employer’s future benefit payments, contributions and investment returns into the future under 5,000 possible economic scenarios. Future inflation (and therefore benefit payments) and investment returns for each asset class (and therefore employer asset values) are variables in the projections. By projecting the evolution of an employer’s assets and benefit payments 5,000 times, a contribution rate can be set that results in a sufficient number of these future projections (determined by the employer’s required likelihood) being successful at the end of the employer’s time horizon. In this context, a successful contribution rate is one which results in the employer having met its funding target at the end of the time horizon.

Setting employer contribution rates therefore requires two types of assumptions to be made about the future:

1. Assumptions to project the employer’s assets, benefits and cashflows to the end of the funding time horizon. For this purpose the actuary uses Hymans Robertson’s proprietary stochastic economic model - the Economic Scenario Service (“ESS”).
2. Assumptions to assess whether, for a given projection, the funding target is satisfied at the end of the time horizon. For this purpose, the Fund has three different funding bases.



Details on the ESS assumptions and funding target assumptions are included below (in E2 and E3 respectively).

E2 What assumptions are used in the ESS?

The actuary uses Hymans Robertson's ESS model to project a range of possible outcomes for the future behaviour of asset returns and economic variables. With this type of modelling, there is no single figure for an assumption about future inflation or investment returns. Instead, there is a range of what future inflation or returns will be which leads to likelihoods of the assumption being higher or lower than a certain value.

The ESS is a complex model to reflect the interactions and correlations between different asset classes and wider economic variables. The table below shows the calibration of the model as at 31 March 2019. All returns are shown net of fees and are the annualised total returns over 5, 10 and 20 years, except for the yields which refer to the simulated yields at that time horizon.

		Annualised total returns							RPI inflation expectation	17 year real gov't bond yield	17 year gov't bond yield
		Cash	Index Linked Gilts (medium)	Fixed Interest Gilts (medium)	UK Equity	Overseas Equity	Property	A rated corporate bonds (medium)			
5 years	16th %ile	-0.4%	-2.3%	-2.9%	-4.1%	-4.1%	-3.5%	-2.7%	1.9%	-2.5%	0.8%
	50th %ile	0.7%	0.5%	0.3%	4.0%	4.1%	2.4%	0.8%	3.3%	-1.7%	2.1%
	84th %ile	2.0%	3.3%	3.4%	12.7%	12.5%	8.8%	4.0%	4.9%	-0.8%	3.6%
10 years	16th %ile	-0.2%	-1.8%	-1.3%	-1.5%	-1.4%	-1.5%	-0.9%	1.9%	-2.0%	1.2%
	50th %ile	1.3%	0.0%	0.2%	4.6%	4.7%	3.1%	0.8%	3.3%	-0.8%	2.8%
	84th %ile	2.9%	1.9%	1.7%	10.9%	10.8%	7.8%	2.5%	4.9%	0.4%	4.8%
20 years	16th %ile	0.7%	-1.1%	0.1%	1.2%	1.3%	0.6%	0.7%	2.0%	-0.7%	2.2%
	50th %ile	2.4%	0.3%	1.0%	5.7%	5.8%	4.3%	1.9%	3.2%	0.8%	4.0%
	84th %ile	4.5%	2.0%	2.0%	10.3%	10.4%	8.1%	3.0%	4.7%	2.2%	6.3%
	Volatility (Disp) (1 yr)	1%	7%	10%	17%	17%	14%	11%	1%		

E3 What assumptions are used in the funding target?

At the end of an employer's funding time horizon, an assessment will be made – for each of the 5,000 projections – of how the assets held compare to the value of assets required to meet the future benefit payments (the funding target). Valuing the cost of future benefits requires the actuary to make assumptions about the following financial factors:

- Benefit increases and CARE revaluation
- Salary growth
- Investment returns (the "discount rate")

Each of the 5,000 projections represents a different prevailing economic environment at the end of the funding time horizon and so a single, fixed value for each assumption is unlikely to be appropriate for every projection. For example, a high assumed future investment return (discount rate) would not be prudent in projections with a weak outlook for economic growth. Therefore, instead of using a fixed value for each assumption, the actuary references economic indicators to ensure the assumptions remain appropriate for the prevailing economic environment in each projection. The economic indicators the actuary uses are: future inflation expectations and the prevailing risk free rate of return (the yield on long term UK government bonds is used as a proxy for this rate).

The Fund has three funding bases which will apply to different employers depending on their type. Each funding basis has a different assumption for future investment returns when determining the employer's funding target.

Funding basis	Ongoing participation	Contractor exit basis	Low risk exit basis
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	basis		
Employer type	All employers except Transferee Admission Bodies and closed Community Admission Bodies	Transferee Admission Bodies	Community Admission Bodies that are closed to new entrants
Investment return assumption underlying the employer's funding target (at the end of its time horizon)	Long term government bond yields plus an asset outperformance assumption (AOA) of 2.0% p.a.	Long term government bond yields plus an AOA equal to the AOA used to allocate assets to the employer on joining the Fund	Long term government bond yields with no allowance for outperformance on the Fund's assets

E4 What other assumptions apply?

The following assumptions are those of the most significance used in both the projection of the assets, benefits and cashflows and in the funding target.

a) Salary growth

After discussion with Fund officers, the salary increase assumption at the 2019 valuation has been set to be a blended rate combined of:

1. 2% p.a. until 31 March 2024, followed by
2. retail prices index (RPI) less 0.5% p.a. thereafter.

This gives a single "blended" assumption of RPI less 0.7% p.a. This is a minor change from the previous valuation, which assumed a blended assumption of RPI less 0.6% per annum. The change has led to a very small increase in the funding target (all other things being equal).

b) Pension increases

Since 2011 the consumer prices index (CPI), rather than RPI, has been the basis for increases to public sector pensions in deferment and in payment. Note that the basis of such increases is set by the Government, and is not under the control of the Fund or any employers.

At this valuation, we have continued to assume that CPI is 1.0% per annum lower than RPI. (Note that the reduction is applied in a geometric, not arithmetic, basis).

c) Life expectancy

The demographic assumptions are intended to be best estimates of future experience in the Fund based on past experience of LGPS funds which participate in Club Vita, the longevity analytics service used by the Fund, and endorsed by the actuary.

The longevity assumptions that have been adopted at this valuation are a bespoke set of "VitaCurves", produced by the Club Vita's detailed analysis, which are specifically tailored to fit the membership profile of the Fund. These curves are based on the data provided by the Fund for the purposes of this valuation.

Allowance has been made in the ongoing valuation basis for future improvements in line with the 2018 version of the Continuous Mortality Investigation model published by the Actuarial Profession and a 1.25% per annum

minimum underpin to future reductions in mortality rates. This updated allowance for future improvements will generally result in lower life expectancy assumptions and hence a reduced funding target (all other things being equal).

The approach taken is considered reasonable in light of the long term nature of the Fund and the assumed level of security underpinning members' benefits.

d) General

The same financial assumptions are adopted for most employers (on the ongoing participation basis identified above), in deriving the funding target underpinning the Primary and Secondary rates: as described in [\(3.3\)](#), these calculated figures are translated in different ways into employer contributions, depending on the employer's circumstances.

The demographic assumptions, in particular the life expectancy assumption, in effect vary by type of member and so reflect the different membership profiles of employers.

Appendix F – Glossary

Funding basis	The combined set of assumptions made by the actuary, regarding the future, to calculate the value of the funding target at the end of the employer’s time horizon. The main assumptions will relate to the level of future investment returns, salary growth, pension increases and longevity. More prudent assumptions will give a higher funding target, whereas more optimistic assumptions will give a lower funding target.
Administering Authority	The council with statutory responsibility for running the Fund, in effect the Fund’s “trustees”.
Admission Bodies	Employers where there is an Admission Agreement setting out the employer’s obligations. These can be Community Admission Bodies or Transferee Admission Bodies. For more details (see 2.3).
Covenant	The assessed financial strength of the employer. A strong covenant indicates a greater ability (and willingness) to pay for pension obligations in the long run. A weaker covenant means that it appears that the employer may have difficulties meeting its pension obligations in full over the longer term.
Designating Employer	Employers such as town and parish councils that are able to participate in the LGPS via resolution. These employers can designate which of their employees are eligible to join the Fund.
Employer	An individual participating body in the Fund, which employs (or used to employ) members of the Fund. Normally the assets and funding target values for each employer are individually tracked, together with its Primary rate at each valuation .
Gilt	A UK Government bond, ie a promise by the Government to pay interest and capital as per the terms of that particular gilt, in return for an initial payment of capital by the purchaser. Gilts can be “fixed interest”, where the interest payments are level throughout the gilt’s term, or “index-linked” where the interest payments vary each year in line with a specified index (usually RPI). Gilts can be bought as assets by the Fund, but in funding as an objective measure of a risk-free rate of return.
Guarantee / guarantor	A formal promise by a third party (the guarantor) that it will meet any pension obligations not met by a specified employer. The presence of a guarantor will mean, for instance, that the Fund can consider the employer’s covenant to be as strong as its guarantor’s.
Letting employer	An employer which outsources or transfers a part of its services and workforce to another employer (usually a contractor). The contractor will pay towards the LGPS benefits accrued by the transferring members, but ultimately the obligation to pay for these benefits will revert to the letting employer. A letting employer will usually be a local authority, but can sometimes be another type of employer such as an Academy.
LGPS	The Local Government Pension Scheme, a public sector pension arrangement put in place via Government Regulations, for workers in local government. These

Regulations also dictate eligibility (particularly for Scheduled Bodies), members' contribution rates, benefit calculations and certain governance requirements. The LGPS is divided into 100 Funds which map the UK. Each LGPS Fund is autonomous to the extent not dictated by Regulations, e.g. regarding investment strategy, employer contributions and choice of advisers.

Maturity	A general term to describe a Fund (or an employer's position within a Fund) where the members are closer to retirement (or more of them already retired) and the investment time horizon is shorter. This has implications for investment strategy and, consequently, funding strategy.
Members	The individuals who have built up (and may still be building up) entitlement in the Fund. They are divided into actives (current employee members), deferreds (ex-employees who have not yet retired) and pensioners (ex-employees who have now retired, and dependants of deceased ex-employees).
Primary contribution rate	The employer contribution rate required to pay for ongoing accrual of active members' benefits (including an allowance for administrative expenses). See Appendix D for further details.
Profile	The profile of an employer's membership or liability reflects various measurements of that employer's members , ie current and former employees. This includes: the proportions which are active, deferred or pensioner; the average ages of each category; the varying salary or pension levels; the lengths of service of active members vs their salary levels, etc. A membership (or liability) profile might be measured for its maturity also.
Rates and Adjustments Certificate	A formal document required by the LGPS Regulations, which must be updated at the conclusion of the formal valuation . This is completed by the actuary and confirms the contributions to be paid by each employer (or pool of employers) in the Fund for the period until the next valuation is completed.
Scheduled Bodies	Types of employer explicitly defined in the LGPS Regulations, whose employees must be offered membership of their local LGPS Fund. These include Councils, colleges, universities, academies, police and fire authorities etc, other than employees who have entitlement to a different public sector pension scheme (e.g. teachers, police and fire officers, university lecturers).
Secondary contribution rate	The difference between the employer's actual and Primary contribution rates . See Appendix D for further details.
Stabilisation	Any method used to smooth out changes in employer contributions from one year to the next. This is very broadly required by the LGPS Regulations, but in practice is particularly employed for large stable employers in the Fund.
Valuation	A risk management exercise to review the Primary and Secondary contribution rates , and other statutory information for a Fund, and usually individual employers too.

HYMANS  ROBERTSON

Lincolnshire Pension Fund

DRAFT Actuarial valuation as at 31 March 2019

Valuation report

March 2020



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1 Introduction

Background to the actuarial valuation

We have been commissioned by Lincolnshire County Council (“the Administering Authority”) to carry out an actuarial valuation of the Lincolnshire Pension Fund (“the Fund”) as at 31 March 2019 as required under Regulation 62 of the Local Government Pension Scheme Regulations 2013 (“the Regulations”).

The actuarial valuation is a risk management exercise with the purpose of reviewing the current funding plans and setting contribution rates for the Fund’s participating employers for the period from 1 April 2020 to 31 March 2023. This report summarises the outcomes of the valuation and the underlying advice provided to the Administering Authority throughout the valuation process.

This summary report is the culmination of other communications in relation to the valuation, in particular:

- Our [2019 valuation toolkit](#) which sets out the methodology used when reviewing funding plans;
- Our paper to the Fund’s Pension Committee dated 27 June 2019 which discusses the valuation assumptions;
- Our Initial Results Report issued 11 October 2019 which outlines the whole Fund results and inter-valuation experience;
- The Funding Strategy Statement which details the approach taken to adequately fund the current and future benefits due to members.

Reliances and Limitations

This report has been prepared for the sole use of Lincolnshire County Council in its role as Administering Authority of the Fund to provide an actuarial valuation of the Fund as required under the Regulations. It has not been prepared for any other third party or for any other purpose. We make no representation or warranties to any third party as to the accuracy or completeness of this report, no reliance should be placed on this report by any third party and we accept no responsibility or liability to any third party in respect of it.

Hymans Robertson LLP is the owner of all intellectual property rights in this report. All such rights are reserved.

The totality of our advice complies with the Regulations as they relate to actuarial valuations.

The following Technical Actuarial Standards¹ are applicable in relation to this report and have been complied with where material:

- TAS 100 – Principles for technical actuarial work;
- TAS 300 – Pensions.

¹ Technical Actuarial Standards (TASs) are issued by the Financial Reporting Council (FRC) and set standards for certain items of actuarial work.

Use of this report by other parties

This report is addressed to the Administering Authority of the Fund only. We appreciate that other parties may also seek information about the 2019 valuation process and methodology. We would encourage such parties to refer to the following publicly available documents for further information:

- The Fund's Funding Strategy Statement;
- The Fund's Investment Strategy Statement;
- Published meeting papers and minutes for the quarterly meetings of the Fund's Pensions Committee.

Considering these papers alongside this valuation report will provide a more complete view of the Fund's funding strategy and decision-making process surrounding this. These documents are available on the Fund's website or on request.

2 Valuation approach

Employer contribution rates

The purpose of the valuation is to review the current funding strategy and ensure the Fund has a contribution plan and investment strategy in place that will enable it to pay members' benefits as they fall due.

Valuations for open defined benefit multi-employer pension funds such as the Lincolnshire Pension Fund are complex. Firstly, the time horizons are very long; benefits earned in the LGPS today will be paid out over a period of the next 80 years or more, and new members will continue to join in the future. Secondly, as they depend on unknowns such as future inflation and life expectancy, the actual value of future benefit payments is uncertain. Finally, to keep contributions affordable, the Fund invests in return seeking assets which have higher levels of future volatility.

Given the above and that the future cannot be predicted with certainty, employer contribution rates can only ever be an estimate. However, the valuation approach adopted uses an understanding of the Fund, and the uncertainties and risks discussed above, to quantify the likelihood of the contribution plan and investment strategy for each employer being sufficient to fund future benefits.

This is achieved in practice by following the process outlined below.

Step 1: The Fund sets a funding target (or funding basis) for each employer which defines the estimated amount of assets to be held to meet the future benefit payments.

Step 2: The Fund sets the funding time horizon over which the funding target is to be achieved.

Step 3: The Fund sets contributions that give a sufficiently high likelihood of meeting the funding target over the set time horizon.

These three steps are central to the "risk-based" approach to funding which is described in Guide 5 of our [2019 valuation toolkit²](#).

The risk-based approach uses an Asset Liability Model (described in Guide 6 of the [2019 valuation toolkit](#)) to project each employer's future benefit payments, contributions and investment returns into the future under 5,000 possible economic scenarios. Future inflation (and therefore benefit payments) and investment returns for each asset class (and therefore asset values) are variables in the projections. Further details of these variables are provided in Appendix 2. The investment strategy underlying the projection of employer asset values is provided in Appendix 1.

By projecting the evolution of an employer's assets and benefit payments 5,000 times, a contribution rate can be set that results in a sufficient number of the future projections being successful i.e. meeting the funding target by the funding time horizon.

The risk-based approach to setting employer contributions allows the Fund and its employers to understand and quantify the level of risk inherent in funding plans, something that is not possible using a single set of assumptions alone.

² https://www.hymans.co.uk/media/uploads/LGPS_2019_Valuation_Toolkit_Guides.pdf

Further detail on the approach to calculating contributions for individual employers, including the parameters used in the three steps for each type of employer, is set out in the Funding Strategy Statement effective from 19 March 2020.

Funding position as at 31 March 2019

The valuation also offers an opportunity to measure the Fund's funding position as at 31 March 2019. Whilst this measurement has limited insight into understanding the long term ability to be able to pay members' benefits, it is a useful summary statistic.

For the purposes of this valuation we have adopted a "mark to market" approach, meaning that the Fund's assets have been taken into account at their market value and the liabilities have been valued by reference to a single set of assumptions based on market indicators at the valuation date. These assumptions are detailed in Appendix 2. As we have taken a market-related approach to the valuation of both the assets and the liabilities, we believe that they have been valued on a consistent basis.

Significant events

The figures in this report are based on our understanding of the benefit structure of the LGPS in England and Wales as at 31 March 2019. Details can be found at <http://www.lgpsregs.org/>.

McCloud ruling

The LGPS benefit structure is currently under review following the Government's loss of the right to appeal the McCloud and other similar court cases. At the time of writing, the format and scope of any benefit changes in light of the McCloud ruling is still unknown. In line with the [advice issued by the Scheme Advisory Board in May 2019](#), the following allowance has been made at the valuation for the McCloud ruling:

- Employer contribution rates: additional prudence in funding plans via an increase in the likelihood of success (step 3) when setting contribution rates;
- Measurement of funding position at 31 March 2019: no allowance.

Further details of the approach taken are set out in Section 2.7 of the Funding Strategy Statement.

Indexation and equalisation of Guaranteed Minimum Pensions (GMP)

As a result of the Government's introduction of a single-tier state pension (STP) there is currently uncertainty around who funds certain elements of increases on GMPs for members reaching State Pension Age after 6 April 2016.

As part of the introduction of STP, the Government confirmed that public service pension schemes, including the LGPS, will be responsible for funding all increases on GMP as an 'interim solution'. In their [January 2018 consultation response](#), HM Treasury confirmed that the 'interim solution' will continue to remain in place up to 5 April 2021. Thereafter the Government's preferred approach is to convert GMP to scheme pension.

For the 2019 valuation, given the Government's preference for conversion to scheme benefits, we have assumed that all increases on GMPs for members reaching State Pension Age after 6 April 2016 will be paid for by LGPS employers. This has served to increase the value placed on the liabilities.

The Government have also stated that their preferred long term indexation solution of converting GMP to scheme pension will also meet the requirements of equalisation.

3 Valuation results

Employer contribution rates

The key objective of the Fund is to set employer contributions that are likely to be sufficient to meet both the cost of new benefits accruing and to address any funding surplus or deficit relative to the funding target over the agreed time horizon. A secondary objective is to maintain relatively stable employer contribution rates.

In order to meet the above objectives, the methodology set out in Section 2 has been used to set employer contributions from 1 April 2020.

Employer contributions are made up of two elements:

- a) the estimated cost of future benefits being built up each year, after deducting members' own contributions and including an allowance for the Fund's administration expenses. This is referred to as the "Primary rate", and is expressed as a percentage of members' pensionable pay; plus
- b) an adjustment for the difference between the Primary rate above, and the total contribution the employer needs to pay, referred to as the "Secondary rate". In broad terms, the Secondary rate is in respect of benefits already accrued at the valuation date. The Secondary rate may be expressed as a percentage of pay and/or a monetary amount in each year.

The Primary rate and Secondary rate for every contributing employer in the Fund is set out in the Rates and Adjustments Certificate in Appendix 3.

Each employer has been certified Primary and Secondary contributions that are appropriate for that employer's circumstances and which reflects that employer's experience. However, broadly speaking:

- Primary contribution rates have been subject to some upwards pressure as a result of a weaker outlook for future investment returns and the additional prudence built into funding plans to allow for the McCloud ruling;
- Secondary contributions have also increased since 31 March 2016, reflecting the Fund's funding strategy plan.

The table below summarises the whole Fund Primary and Secondary Contribution rates at this valuation. The Primary rate is the payroll weighted average of the underlying individual employer Primary rates and the Secondary rate is the total of the underlying individual employer Secondary rates, calculated in accordance with the Regulations and CIPFA guidance. The whole Fund Primary and Secondary contributions calculated at the 2016 valuation of the Fund are shown for comparison.

	Last Valuation 31 March 2016		This Valuation 31 March 2019	
Primary Rate (% of pay)	17.4%		18.6%	
Secondary Rate (£)	2017/18	18,004,000	2020/21	22,875,000
	2018/19	20,539,000	2021/22	25,727,000
	2019/20	23,222,000	2022/23	28,687,000

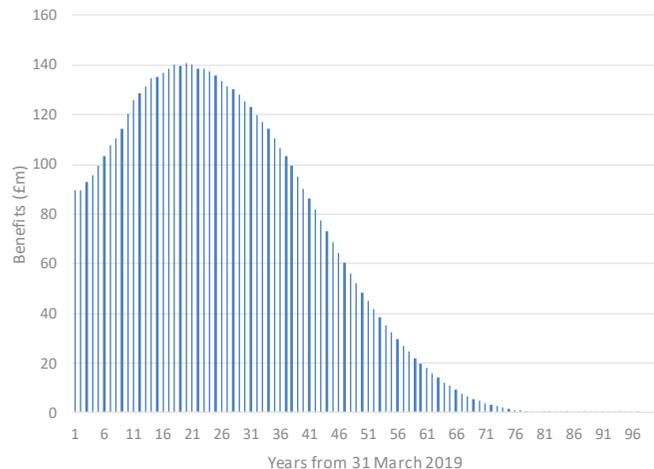
The Primary rate includes an allowance of 0.5% of pensionable pay for the Fund's expenses (0.5% at the 2016 valuation).

The average employee contribution rate is 6.1% of pensionable pay (6.1% at the 2016 valuation).

Funding position as at 31 March 2019

The funding position is a summary statistic often quoted to give an indication of the health of the Fund. It is limited as it provides only a snapshot in time and is based on a single set of assumptions about the future. To measure the funding position at 31 March 2019, we compare the value of the Fund’s assets on that date against the expected cost (including an allowance for future investment returns) of all the future benefit payments accrued up to the valuation date (the liabilities).

The chart below details the projected future benefit payments based on the membership data summarised in Appendix 1 and the demographic, salary and benefit increases assumptions summarised in Appendix 2.



Using an assumption about the future investment return generated from the Fund’s assets allows a value to be placed on these payments in today’s money; the liabilities. The higher the assumed investment return, the lower the liability value and therefore the higher the funding level.

The value placed on the liabilities is extremely sensitive to the investment return assumption. Based on the Fund’s current benchmark investment strategy (detailed in Appendix 1) and the same model used in the contribution rate calculations, it is estimated that:

- There is a 50% likelihood of the Fund’s investments achieving at least an annual return of 5.5% p.a. over the next 20 years;
- There is a 71% likelihood of the Fund’s investments achieving at least an annual return of 4.0% p.a. over the next 20 years; and
- There is an 80% likelihood of the Fund’s investments achieving at least an annual return of 3.2% p.a. over the next 20 years.

The following chart shows how the funding level varies with the future investment return assumption (blue line). For comparison, the funding level associated with the same choice of investment return assumption at the 2016 valuation is also shown (grey line).

Likelihood of achieving the assumed future investment return over 20 years (from the 2019 valuation date)



From this chart, we can see that:

- Regardless of the investment return assumption used, there has been a genuine improvement in the funding position at 31 March 2019 compared to the last valuation, reflecting an increase in the assets held today per pound of benefit to be paid out in future;
- The funding position would be 100% if future investment returns were around 4.4% p.a. (at 2016, the investment return would have needed to be 5.5% p.a.). The likelihood of the Fund’s assets yielding at least this return is approximately 66%;
- If future investment returns were 5.5% p.a. then the Fund currently holds sufficient assets to meet 121% of the accrued liabilities. The likelihood of the Fund’s assets yielding at least this return is 50%. 121% can therefore be considered the “best estimate” funding position.

Reported funding position

The valuation outputs are more meaningful when stakeholders can understand the likelihood, and hence the level of prudence, attached to them. The above chart does this for the measurement of the funding position.

However, there is still a requirement to report a single funding position at 31 March 2019. This reported position must include a margin of prudence.

For the purpose of reporting a funding level and an associated funding surplus/deficit for the 2019 valuation, an investment return of 4.0% p.a. has been used. It is estimated that the Fund’s assets have a 71% likelihood of achieving this return.

The resulting funding position is as follows:

Valuation Date	31 March 2016	31 March 2019
Past Service Liabilities	(£m)	(£m)
Employees	769	869
Deferred Pensioners	488	500
Pensioners	1,031	1,167
Total Liabilities	2,288	2,536
Assets	1,759	2,353
Surplus / (Deficit)	(529)	(183)
Funding Level	77%	93%

There has been an improvement in the reported funding level since 31 March 2016 from 77% to 93% and a reduction in the funding deficit from £529m to £183m.

A breakdown of the key factors that have influenced the reported funding position from 31 March 2016 to 31 March 2019 are detailed overleaf.

Change in the surplus/deficit position	Assets (£m)	Liabilities (£m)	Surplus / (Deficit) (£m)
Last valuation at 31 March 2016	1,759	2,288	(529)
Cashflows			
Employer contributions paid in	222		222
Employee contributions paid in	59		59
Benefits paid out	(261)	(261)	0
Net transfers into / out of the Fund*	5		5
Other cashflows (e.g. Fund expenses)	(5)		(5)
Expected changes in membership			
Interest on benefits already accrued		288	(288)
Accrual of new benefits		273	(273)
Membership experience vs expectations			
Salary increases less than expected		(6)	6
Benefit increases less than expected		(0)	0
Early retirement strain (and contributions)	4	5	(1)
Ill health retirement gain		(6)	6
Early leavers greater than expected		(1)	1
Pensions ceasing greater than expected		(5)	5
Commutation less than expected		3	(3)
Impact of GMP equalisation		3	(3)
Other membership experience		(25)	25
Changes in market conditions			
Investment returns on the Fund's assets	569		569
Changes in future inflation expectations		73	(73)
Changes in actuarial assumptions			
Change in demographic assumptions (excl. longevity)		(5)	5
Change in longevity assumptions		(85)	85
Change in salary increase assumption		(4)	4
Change in assumed rate of investment returns		0	(0)
This valuation at 31 March 2019	2,353	2,536	(183)

* We have insufficient data to value the impact on the liabilities as a result of transfers in/out

Since the previous valuation, various events have taken place which affect the value placed on the liabilities, including:

- There is an interest cost of £288m. This is broadly three years of compound interest at 4.0% p.a. applied to the previous valuation liability value of £2,288m. The benefits that have been accrued to the valuation date are three years closer to payment at 31 March 2019 than they were at 31 March 2016, meaning there is less opportunity for future investment returns to help meet this cost. This serves to increase the value placed on the liabilities;
- The areas of membership experience that have had the greatest impact on the surplus/deficit position of the Fund are set out below, together with their impact on the liabilities:

	Expected	Actual	Difference	Impact on Liabilities
Pre-retirement experience				
Early leavers (no of lives)	6,103	7,298	1,195	Positive
Ill health retirements (no of lives)	176	121	(55)	Positive
Salary increases (p.a.)	3.2%	2.9%	(0.3%)	Positive
Post-retirement experience				
Benefit increases (p.a.)	2.1%	2.1%	(0.0%)	Broadly neutral
Pensions ceasing (£m)	5,534	6,122	588	Positive

- The changes to the longevity assumptions used for the valuation have resulted in a modest reduction in life expectancies. This has served to reduce the liabilities by £85m;
- The assumed rate of future CPI inflation has increased from 2.1% p.a. at 31 March 2016 to 2.3% p.a. at 31 March 2019. This has increased the value of the liabilities by £73m.

There has been a large increase in the value of the Fund's assets since the previous valuation because:

- The investment return on the Fund's assets for the period 31 March 2016 to 31 March 2019 was 36.2%. This has increased the value of the assets by £569m.

Projection of the funding position

The progression of the funding position will depend on various factors including future asset performance, economic conditions and membership movements. If the financial and demographic assumptions made at this valuation are borne out in practice, and there are no changes to the valuation assumptions, we project that the funding level at the 2022 valuation date will be approximately 94%. This allows for contributions to be paid as described in Appendix 3.

4 Sensitivity analysis

The results set out in this report are based on assumptions about the future. The actual cost of providing the benefits will depend on the actual experience of the Fund, which could be significantly better or worse than assumed. This section discusses the sensitivity of the results to some of the key assumptions.

Sensitivity of contribution rates to changes in assumptions

The approach to setting employer contribution rates mitigates the limitation of relying on one particular set of assumptions about the future by recognising the uncertainty around future investment returns and inflation. Therefore, there is no need to carry out additional analysis of the sensitivity of contribution rates to changes in financial assumptions.

The contribution rates are sensitive to changes in demographic assumptions. The results in this section in relation to the funding position can be broadly applied to the contribution rates.

Sensitivity of the funding position to changes in assumptions

The reported valuation funding position is based on one set of actuarial assumptions about the future of the Fund. If all of the assumptions made were exactly borne out in practice then the liability value presented in this report would represent the actual cost of providing benefits from the Fund as it stands at 31 March 2019.

Sensitivity of the funding position to future investment returns

The chart in Section 3 details how the funding position varies with the future assumed investment return.

Sensitivity of the funding position to future inflation

Pensions (both in payment and in deferment) in the LGPS increase annually in line with CPI. Furthermore, benefits accrued in the CARE scheme are revalued annually in line with CPI. If future CPI inflation is higher than the assumed rate of 2.3% then the cost of the benefits will be higher than we have set out in Section 3.

The table quantifies the impact on the funding position of varying the benefit increases and CARE revaluation (CPI) assumption below.

CPI Assumption	Surplus/(Deficit)	Funding Level
% pa	(£m)	%
2.1%	(110)	96%
2.3%	(183)	93%
2.5%	(256)	90%

Sensitivity of the funding position to life expectancy

The main area of demographic risk is people living longer than expected. If long term mortality rates fall at a rate of 1.5% p.a. (compared to the assumed 1.25% p.a.) then members will live slightly longer than we have assumed in this valuation. The impact on the funding position is detailed below.

Long term rate of improvement	Surplus/(Deficit)	Funding Level
% pa	(£m)	%
1.25%	(183)	93%
1.50%	(448)	84%

Other demographic risks to consider

There are other risk factors which would have an impact on the funding position. Examples of these include the level of ill health retirements, withdrawals from the scheme and take up of the 50:50 option. These are probably unlikely to change in such a way that would rank them as amongst the highest risks facing the Fund and therefore there has been no further quantification of their risk.

Comment on sensitivity analysis

Note that the tables above show the effect of changes to each assumption in isolation. In reality, it is perfectly possible for the experience of the Fund to deviate from more than one of the assumptions simultaneously and so the precise effect on the funding position is therefore more complex. Furthermore, the range of assumptions shown here is by no means exhaustive and should not be considered as the limits of how extreme experience could actually be.

As of March 2020, the funding position is expected to have improved as a result of positive asset performance since 31 March 2019.

Other risks to consider

Regulatory, Administration and Governance risks

As well as financial and demographic risks, the Fund also faces:

- Regulatory risks – central government legislation could significantly change the cost of the scheme in the future; and
- Administration and governance risk – failures in administration processes could lead to incorrect data and inaccuracies in the actuarial calculations.

These risks are considered and monitored by the Fund as part of its ongoing risk management framework.

Resource and environment risks

The Fund is exposed to risks relating to future resource constraints and environmental changes. These risks may prove to be material.

Climate change is a complex issue for the Fund. Adverse future climate change outcomes will have an impact on future longevity, inflation, government and corporate bond yields and equity returns.

Whilst there has been no explicit increase in certified employer contribution related to climate change, these risks may be considered by the Administering Authority when assessing the output from contribution rate ('comPASS') modelling.

Risk management

Employers participating in the Fund are exposed to a number of risks. These include, but are not limited to:

- Investment risk;
- Market risks;
- Demographic risks;
- Regulatory risks;
- Administration and Governance risks;
- Resource and Environmental risks.

The Funding Strategy Statement has further details about these risks and what actions the Fund takes to monitor, mitigate and manage each one.

5 Final comments

The Fund's valuation operates within a broader framework, and this document should therefore be considered alongside the following:

- the Funding Strategy Statement, which in particular highlights how different types of employer in different circumstances have their contributions calculated;
- the Investment Strategy Statement, which sets out the investment strategy for the Fund;
- the general governance of the Fund, such as meetings of the Pensions Committee and Local Pension Board, decisions delegated to officers, the Fund's business plan, etc;
- the Fund's risk register; and
- the information the Fund holds about the participating employers.

Intervaluation employer events

New employers joining the Fund

Any new employers or admission bodies joining the Fund should be referred to the Fund Actuary to assess the required level of contribution. Depending on the number of transferring members the ceding employer's rate may also need to be reviewed.

Cessations and bulk transfers

Any employer who ceases to participate in the Fund should be referred to us in accordance with Regulation 62 of the Regulations.

Any bulk movement of scheme members:

- involving 10 or more scheme members being transferred from or to another LGPS fund; or
- involving 2 or more scheme members being transferred from or to a non-LGPS pension arrangement;

should be referred to us to consider the impact on the Fund.

Valuation frequency

Under the provisions of the LGPS regulations, the next formal valuation of the Fund is due to be carried out as at 31 March 2022 where contribution rates payable from 1 April 2023 will be set.

Peter Summers FFA

Anne Cranston AFA

For and on behalf of Hymans Robertson LLP

4 March 2020

Appendix



Appendix 1 – Data

Membership data as at 31 March 2019

A summary of the membership data provided by the Administering Authority for the purposes of the valuation at 31 March 2019 is shown below. The corresponding membership data from the previous valuation is also shown for reference.

Whole Fund Membership Data	Last Valuation 31 March 2016	This Valuation 31 March 2019
Employee members		
Number	22,304	22,755
Total Actual Pay (£000)	295,783	335,509
Total Accrued Pension (£000) (CARE)	11,560	26,643
Average Age (liability weighted)	50.9	51.3
Future Working Lifetime (years)	9.5	8.5
Deferred pensioners		
Number	33,587	32,184
Total Accrued Pension (£000)	28,263	29,729
Average Age (liability weighted)	50.6	50.9
Pensioners		
Number	18,241	21,576
Total pensions in payment (£000)	65,120	75,310
Average Age (liability weighted)	68.0	68.5
Average duration of liabilities	16.7	17.7

Benchmark investment strategy

The following investment strategy, extracted from the Fund's Investment Strategy Statement, has been used to assess employer contribution rates and to set the future investment return assumption as at 31 March 2019:

% allocation	Current strategy
UK equities	15%
Overseas equities	40%
Diversified Growth	15%
Infrastructure (equity)	2%
Total growth assets	72%
Index-linked gilts	2%
Fixed interest gilts	5%
UK Corporate Bonds	7%
Total protection assets	14%
Multi asset credit	5%
Property	9%
Total income generating assets	14%
Grand total	100%

Other data used in this valuation

We have also relied upon asset and accounting data from the Fund's published 2016/17, 2017/18 and 2018/19 Annual Report and Accounts. Employer level cashflow data was provided by the Administering Authority and reconciled against the information shown in these documents.

Comment on data quality

The results of the valuation are dependent on the quality of the data provided to us by the Administering Authority for the specific purpose of this valuation. We have carried out validations on the membership data provided to ensure it is fit for the purpose of the valuation. Further details can be found in our report issued to the Administering Authority entitled "Data report for 2019 valuation". We believe the membership data is fit for the purposes of this valuation.

Appendix 2 – Assumptions

Financial assumptions used to set employer contribution rates

Projection of assets and benefit payments

The approach to setting employer contribution rates does not rely on a single set of assumptions but involves the projection of an employer's future benefit payments, contributions and investment returns under 5,000 future economic scenarios. In this modelling, inflation (and therefore benefit payments) and investment returns for each asset class (and employer asset values) are variables and take different values in each projection.

The model underlying these projections is Hymans Robertson's proprietary economic model, the Economic Scenario Service (ESS). The ESS is a complex model to reflect the interactions and correlations between different asset classes and wider economic variables. The table below shows the calibration of the model as at 31 March 2019. All returns are shown net of fees and are the annualised total returns over 5, 10 and 20 years, except for the yields which refer to simulated yields at that time horizon.

Annualised total returns

		Cash	Index Linked Gilts (medium)	Fixed Interest Gilts (medium)	UK Equity	Overseas Equity	Property	Corp Medium A	Inflation	17 year real yield	17 year yield
5 years	16th %ile	-0.4%	-2.3%	-2.9%	-4.1%	-4.1%	-3.5%	-2.7%	1.9%	-2.5%	0.8%
	50th %ile	0.7%	0.5%	0.3%	4.0%	4.1%	2.4%	0.8%	3.3%	-1.7%	2.1%
	84th %ile	2.0%	3.3%	3.4%	12.7%	12.5%	8.8%	4.0%	4.9%	-0.8%	3.6%
10 years	16th %ile	-0.2%	-1.8%	-1.3%	-1.5%	-1.4%	-1.5%	-0.9%	1.9%	-2.0%	1.2%
	50th %ile	1.3%	0.0%	0.2%	4.6%	4.7%	3.1%	0.8%	3.3%	-0.8%	2.8%
	84th %ile	2.9%	1.9%	1.7%	10.9%	10.8%	7.8%	2.5%	4.9%	0.4%	4.8%
20 years	16th %ile	0.7%	-1.1%	0.1%	1.2%	1.3%	0.6%	0.7%	2.0%	-0.7%	2.2%
	50th %ile	2.4%	0.3%	1.0%	5.7%	5.8%	4.3%	1.9%	3.2%	0.8%	4.0%
	84th %ile	4.5%	2.0%	2.0%	10.3%	10.4%	8.1%	3.0%	4.7%	2.2%	6.3%
Volatility (Disp) (1 yr)		1%	7%	10%	17%	17%	14%	11%	1%		

Funding target

At the end of an employer's funding time horizon, an assessment is made – for each of the 5,000 projections – of how the assets held compare to the value of assets required to meet the future benefit payments (the funding target). To value the cost of future benefits assumptions are made about the following financial factors:

- Benefit increases and CARE revaluation;
- Salary growth;
- Investment returns (the “discount rate”).

Each of the 5,000 projections represents a different prevailing economic environment at the end of the funding time horizon and so a single, fixed value for each assumption is not appropriate for every projection. Therefore, instead of using a fixed value, each assumption is set with reference to an economic indicator. The economic indicators used are:

Assumption	Economic Indicator
Benefit increases	Future CPI inflation expectations
CARE revaluation	Future CPI inflation expectations
Salary increases	As above plus 0.3% p.a.
Future investment returns	Prevailing risk free rate of return plus margin

The Fund has three funding bases which will apply to different employers depending on their type. Each funding basis uses a different margin in the future investment return assumption.

Funding Basis	Margin above risk-free rate
Ongoing participation	2.0%
Contractor exit	Same as used to allocate assets on joining the Fund
Gilts exit	0%

Financial assumptions used to assess the funding position

Salary and Benefit Increases

Financial Assumptions (p.a.)	31 March 2016	31 March 2019
Benefit increases and CARE revaluation (CPI)	2.1%	2.3%
Salary increases	2.6%*	2.6%**

*RPI less 0.6%

**CPI plus 0.3%

Investment Return

The reported funding position is based on an assumed future investment return of 4.0% p.a. The derivation of this assumption is set out in Section 3. The equivalent assumption at the 2016 valuation was 4.0% p.a. This was derived in a different way, please see the 2016 valuation report for further details.

Demographic assumptions

The same demographic assumptions are used in setting contribution rates and assessing the current funding position.

Longevity

As the Fund is a member of Club Vita, the baseline longevity assumptions are a bespoke set of Vita Curves that are tailored to fit the membership profile of the Fund. These curves are based on the data the Fund has provided us with for the purposes of this valuation.

We have also allowed for future improvements in mortality based on the CMI 2018 model with an allowance for smoothing of recent mortality experience and a long-term rate of improvement of 1.25% p.a. for both women and men.

Longevity Assumptions	31 March 2016	31 March 2019
Baseline Longevity	Club Vita	Club Vita
Future Improvements	CMI2013, Peaked, 1.25% p.a. long term	CMI2018, Smoothed, 1.25% p.a. long term

Full details are available on request.

The longevity assumptions result in the following typical future life expectancies from age 65 (figures for 2016 shown for comparison):

Assumed Life Expectancy	31 March 2016	31 March 2019	
Male	Pensioners	22.1 years	21.4 years
	Non-pensioners	24.1 years	22.4 years
Female	Pensioners	24.4 years	23.7 years
	Non-pensioners	26.6 years	25.2 years

Non-pensioners are assumed to be aged 45 at the valuation date

Other demographic assumptions

We are in the unique position of having a very large local authority data set from which to derive our other demographic assumptions. We have analysed the trends and patterns that are present in the membership of local authority funds and tailored our demographic assumptions to reflect LGPS experience. The resulting demographic assumptions are as follows:

Demographic Assumptions	
Retirements in normal health	We have adopted the retirement age pattern assumption as used for the purpose of the 2016 LGPS cost cap valuation. Further details are available on request.
Death in Service	See sample rates below
Retirements in ill health	See sample rates below
Withdrawals	See sample rates below
Promotional salary increases	See sample increases below
Family details	A varying proportion of members are assumed to have a dependant at retirement or on earlier death. For example, at age 60 this is assumed to be 90% for males and 85% for females. The dependant of a male member is assumed to be 3 years younger than him and the dependant of a female member is assumed to be 3 years older than her.
Commutation	50% of future retirements elect to exchange pension for additional tax free cash up to HMRC limits for service to 1 April 2008 (equivalent 75% service from 1 April 2008).
50:50 option	1.0% of members (uniformly distributed across the age, service and salary range) will choose the 50:50 option.

Sample rates for demographic assumptions

Males

Age	Salary Scale	Incidence per 1000 active members per annum						
		Death Before Retirement FT & PT	Withdrawals		Ill Health Tier 1		Ill Health Tier 2	
			FT	PT	FT	PT	FT	PT
20	105	0.21	252.69	439.47	0.00	0.00	0.00	0.00
25	117	0.21	166.91	290.28	0.00	0.00	0.00	0.00
30	131	0.26	118.43	205.93	0.00	0.00	0.00	0.00
35	144	0.30	92.53	160.88	0.10	0.07	0.02	0.01
40	150	0.51	74.50	129.48	0.16	0.12	0.03	0.02
45	157	0.85	69.98	121.60	0.35	0.27	0.07	0.05
50	162	1.36	57.68	100.12	0.90	0.68	0.23	0.17
55	162	2.13	45.42	78.88	3.54	2.65	0.51	0.38
60	162	3.83	40.49	70.28	6.23	4.67	0.44	0.33
65	162	6.38	0.00	0.00	11.83	8.87	0.00	0.00

Females

Age	Salary Scale	Incidence per 1000 active members per annum						
		Death Before Retirement FT & PT	Withdrawals		Ill Health Tier 1		Ill Health Tier 2	
			FT	PT	FT	PT	FT	PT
20	105	0.12	227.37	252.63	0.00	0.00	0.00	0.00
25	117	0.12	152.99	169.97	0.10	0.07	0.02	0.01
30	131	0.18	128.25	142.46	0.13	0.10	0.03	0.02
35	144	0.30	110.69	122.91	0.26	0.19	0.05	0.04
40	150	0.48	92.12	102.26	0.39	0.29	0.08	0.06
45	157	0.77	85.97	95.41	0.52	0.39	0.10	0.08
50	162	1.13	72.48	80.35	0.97	0.73	0.24	0.18
55	162	1.49	54.08	60.02	3.59	2.69	0.52	0.39
60	162	1.90	43.58	48.31	5.71	4.28	0.54	0.40
65	162	2.44	0.00	0.00	10.26	7.69	0.00	0.00

Prudence in assumptions

We are required to include a degree of prudence within the valuation. This has been achieved in both the setting of contributions and assessment of funding position.

Contribution rates

- Employer funding plans have been set such that the likelihood the employer's funding target is met by the end of the funding time horizon is more than 50%. The actual likelihood varies by employer. Further detail in is the Funding Strategy Statement.

Funding position

- The Fund's investments have a 71% likelihood of returning at least the assumed return.

All other assumptions represent our "best estimate" of future experience.

The assumptions used in this valuation have been agreed with the Administering Authority and are set out in the Fund's Funding Strategy Statement effective from 19 March 2020.

Appendix 3 – Rates and Adjustments certificate

In accordance with regulation 62(4) of the Regulations we have made an assessment of the contributions that should be paid into the Fund by participating employers for the period 1 April 2020 to 31 March 2023 in order to maintain the solvency of the Fund.

The method and assumptions used to calculate the contributions set out in the Rates and Adjustments certificate are detailed in the Funding Strategy Statement effective from 19 March 2020 and in Appendix 2 of our report on the actuarial valuation dated TBC. These assumptions underpin our estimate of the number of members who will become entitled to a payment of pensions under the provisions of the LGPS and the amount of liabilities arising in respect of such members.

The table below summarises the whole fund Primary and Secondary Contribution rates for the period 1 April 2020 to 31 March 2023. The Primary rate is the payroll weighted average of the underlying individual employer Primary rates and the Secondary rate is the total of the underlying individual employer secondary rates, calculated in accordance with the Regulations and CIPFA guidance.

Whole Fund Contribution Rate		
Primary Rate (% of pay)	18.6%	
Secondary Rate (£)	2020/21	22,875,000
	2021/22	25,727,000
	2022/23	28,687,000

The required minimum contribution rates for each employer in the Fund are set out below.

Employer / Pool code	Agresso code	Employer/Pool name	Contributions in payment (2019/2020)			Primary rate % 1 April 2020 2023	Secondary Rate						Total Contribution Rate								
			Primary %	Secondary rate			2020/2021		2021/2022		2022/2023		2020/2021		2021/2022		2022/2023				
				(%)	(£000)		(%)	(£000)	(%)	(£000)	(%)	(£000)	(%)	(£000)	% of pay	(£000)	% of pay	(£000)	% of pay	(£000)	
Scheduled Bodies																					
Pool		Lincolnshire County Council	16.4%	0.0%	£6,510	17.5%		£8,240		£9,540		£10,890	17.5%	plus	£8,240	17.5%	plus	£9,540	17.5%	plus	£10,890
		- Lincolnshire Schools	16.4%	7.5%	£0	17.5%	7.4%		8.4%		9.4%		24.9%	plus	£0	25.9%	plus	£0	26.9%	plus	£0
		- SERCO	16.4%	7.5%	£0	17.5%	7.4%		8.4%		9.4%		24.9%	plus	£0	25.9%	plus	£0	26.9%	plus	£0
		- GLL	16.4%	7.5%	£0	17.5%	7.4%		8.4%		9.4%		24.9%	plus	£0	25.9%	plus	£0	26.9%	plus	£0
902	P30002	West Lindsey District Council	16.2%	0.0%	£863	17.2%		£940		£1,028		£1,119	17.2%	plus	£940	17.2%	plus	£1,028	17.2%	plus	£1,119
903	P30003	East Lindsey District Council	16.6%	0.0%	£789	17.5%		£872		£968		£1,067	17.5%	plus	£872	17.5%	plus	£968	17.5%	plus	£1,067
904	P30004	City of Lincoln Council	16.0%	0.0%	£1,743	17.3%		£1,777		£1,959		£2,147	17.3%	plus	£1,777	17.3%	plus	£1,959	17.3%	plus	£2,147
905	P30006	Boston Borough Council	16.6%	0.0%	£570	17.7%		£598		£670		£745	17.7%	plus	£598	17.7%	plus	£670	17.7%	plus	£745
906	P30005	North Kesteven District Council	16.3%	0.0%	£779	17.6%		£795		£901		£1,010	17.6%	plus	£795	17.6%	plus	£901	17.6%	plus	£1,010
907	P30007	South Kesteven District Council	16.5%	0.0%	£1,128	17.5%		£1,226		£1,393		£1,566	17.5%	plus	£1,226	17.5%	plus	£1,393	17.5%	plus	£1,566
908	P30008	South Holland District Council	16.7%	0.0%	£638	17.4%		£744		£818		£894	17.4%	plus	£744	17.4%	plus	£818	17.4%	plus	£894
Pool		Police and Crime Commissioner for Lincolnshire & G4S	16.3%	0.0%	£1,265	17.5%	-1.2%	£1,448	-1.2%	£1,657	-1.2%	£1,874	16.3%	plus	£1,448	16.3%	plus	£1,657	16.3%	plus	£1,874
Further Education Bodies																					
910	P30009	Bishop Grosseteste University	20.9%	0.0%	£84	23.5%		£76		£76		£76	23.5%	plus	£76	23.5%	plus	£76	23.5%	plus	£76
974	P30026	New College Stamford	20.6%	0.0%	£65	23.8%		£26		£27		£28	23.8%	plus	£26	23.8%	plus	£27	23.8%	plus	£28
975	P30027	Grantham College	21.0%	0.0%	£88	23.8%		£42		£43		£44	23.8%	plus	£42	23.8%	plus	£43	23.8%	plus	£44
977	P30029	Boston College	21.5%	0.0%	£78	23.8%	0.0%	£0	0.0%	£0	0.0%	£0	23.8%	plus	£0	23.8%	plus	£0	23.8%	plus	£0
978	P30030	Lincoln College	22.3%	0.0%	£457	24.5%		£264		£271		£278	24.5%	plus	£264	24.5%	plus	£271	24.5%	plus	£278
Community Admission Bodies																					
815	P20006	Waterloo Housing Group	26.0%	0.0%	£659	28.2%		£392		£392		£392	28.2%	plus	£392	28.2%	plus	£392	28.2%	plus	£392
818	P20008	Lincolnshire Housing Partnership	26.2%	0.0%	£115	29.7%		£143		£143		£143	29.7%	plus	£143	29.7%	plus	£143	29.7%	plus	£143
832	P20014	Active Lincolnshire	21.9%	0.0%	£3	21.6%	0.0%	£0	0.0%	£0	0.0%	£0	21.6%	plus	£0	21.6%	plus	£0	21.6%	plus	£0
833	P20000	Adults Supporting Adults	29.1%	0.0%	£0	31.1%	-2.0%	£0	-2.0%	£0	-2.0%	£0	29.1%	plus	£0	29.1%	plus	£0	29.1%	plus	£0
862	P20022	Lincoln Arts Trust	25.6%	0.0%	£0	28.3%	-2.7%	£0	-2.7%	£0	-2.7%	£0	25.6%	plus	£0	25.6%	plus	£0	25.6%	plus	£0
Drainage Boards																					
911	P30010	Witham Third Internal Drainage Board	17.3%	6.7%	£39	18.9%		£26		£26		£27	18.9%	plus	£26	18.9%	plus	£26	18.9%	plus	£27
Pool		Lindsey Marsh Internal Drainage Board	17.5%	0.0%	£26	18.5%		£28		£29		£30	18.5%	plus	£28	18.5%	plus	£29	18.5%	plus	£30
921	P30045	Black Sluice Internal Drainage Board	16.8%	0.0%	£98	18.2%		£62		£64		£66	18.2%	plus	£62	18.2%	plus	£64	18.2%	plus	£66
922	P30046	Witham Fourth Internal Drainage Board	18.0%	0.0%	£92	19.4%		£76		£77		£80	19.4%	plus	£76	19.4%	plus	£77	19.4%	plus	£80
923	P30047	Welland and Deeping Internal Drainage Board	17.7%	0.0%	£125	19.2%		£112		£115		£118	19.2%	plus	£112	19.2%	plus	£115	19.2%	plus	£118
924	P30048	South Holland Internal Drainage Board	18.3%	10.4%	£100	19.3%	9.4%	£150	9.4%	£150	9.4%	£150	28.7%	plus	£150	28.7%	plus	£150	28.7%	plus	£150
926	P30050	Witham First Internal Drainage Board	19.3%	7.5%	£5	20.5%	-1.2%	£0	-1.2%	£0	-1.2%	£0	19.3%	plus	£0	19.3%	plus	£0	19.3%	plus	£0
927	P30051	Upper Witham Internal Drainage Board	18.4%	0.0%	£58	19.7%		£51		£53		£54	19.7%	plus	£51	19.7%	plus	£53	19.7%	plus	£54
932	P30054	North East Lindsey Internal Drainage Board	17.9%	0.0%	£17	20.7%		£1		£1		£1	20.7%	plus	£1	20.7%	plus	£1	20.7%	plus	£1

Employer / Pool code	Aggresso code	Employer/Pool name	Contributions in payment (2019/2020)			Primary rate % 1 April 2020 2023	Secondary Rate						Total Contribution Rate								
			Primary %	Secondary rate			2020/2021		2021/2022		2022/2023		2020/2021		2021/2022		2022/2023				
				(%)	(£000)		(%)	(£000)	(%)	(£000)	(%)	(£000)	(%)	(£000)	% of pay	(£000)	% of pay	(£000)	% of pay	(£000)	
Academies																					
500	P40073	Welton St Marys Church of England Primary Academy	18.8%	0.0%	£1	21.3%		£5		£6		£6	21.3%	plus	£5	21.3%	plus	£6	21.3%	plus	£6
501	P40074	Boston High School	18.6%	0.0%	£21	21.2%		£28		£29		£30	21.2%	plus	£28	21.2%	plus	£29	21.2%	plus	£30
502	P40076	Spalding Academy	19.4%	0.0%	£59	21.7%		£63		£65		£66	21.7%	plus	£63	21.7%	plus	£65	21.7%	plus	£66
503	P40075	Bracebridge Infant and Nursery School	18.4%	0.0%	£0	20.7%		£2		£2		£2	20.7%	plus	£2	20.7%	plus	£2	20.7%	plus	£2
505	P40080	Boston Grammar School	18.4%	0.0%	£7	20.1%		£7		£7		£8	20.1%	plus	£7	20.1%	plus	£7	20.1%	plus	£8
508	P40086	Manor Leas Junior	18.9%	0.0%	£6	21.3%		£6		£7		£7	21.3%	plus	£6	21.3%	plus	£7	21.3%	plus	£7
509	P40082	Gipsey Bridge Academy	19.9%	0.0%	£4	20.9%		£4		£4		£4	20.9%	plus	£4	20.9%	plus	£4	20.9%	plus	£4
510	P40081	Spalding Grammar School	19.6%	0.0%	£27	21.1%		£27		£28		£29	21.1%	plus	£27	21.1%	plus	£28	21.1%	plus	£29
515	P40089	St Peter and St Paul Catholic Voluntary Academy	19.1%	0.0%	£16	20.8%		£13		£13		£13	20.8%	plus	£13	20.8%	plus	£13	20.8%	plus	£13
516	P40090	Lincoln Our Lady of Lincoln Catholic Primary School	18.8%	0.0%	£2	20.6%	0.0%	£0	0.0%	£0	0.0%	£0	20.6%	plus	£0	20.6%	plus	£0	20.6%	plus	£0
517	P40091	Sleaford Our Lady of Good Counsel	17.9%	0.0%	£0	19.9%	-2.0%	£0	-2.0%	£0	-2.0%	£0	17.9%	plus	£0	17.9%	plus	£0	17.9%	plus	£0
518	P40092	Lincoln St Hugh's Catholic Primary School	19.0%	0.0%	£8	21.5%		£7		£7		£7	21.5%	plus	£7	21.5%	plus	£7	21.5%	plus	£7
519	P40093	Stamford St Augustines	18.8%	0.0%	£3	20.1%		£2		£2		£2	20.1%	plus	£2	20.1%	plus	£2	20.1%	plus	£2
521	P40094	Utterby Primary School	19.5%	0.0%	£1	21.7%		£2		£2		£2	21.7%	plus	£2	21.7%	plus	£2	21.7%	plus	£2
522	P40095	North Thoresby Primary School	18.6%	0.0%	£0	20.6%	0.0%	£0	0.0%	£0	0.0%	£0	20.6%	plus	£0	20.6%	plus	£0	20.6%	plus	£0
524	P50000	Acorn Free School	16.5%	0.0%	£0	19.5%	-3.0%	£0	-3.0%	£0	-3.0%	£0	16.5%	plus	£0	16.5%	plus	£0	16.5%	plus	£0
526	P40097	Carlton Academy	17.6%	0.0%	£0	19.8%		£4		£4		£4	19.8%	plus	£4	19.8%	plus	£4	19.8%	plus	£4
527	P40096	Kirkby La Thorpe	19.4%	0.0%	£2	20.0%		£2		£2		£2	20.0%	plus	£2	20.0%	plus	£2	20.0%	plus	£2
532	P40099	Wainfleet Magdalene C of E Academy	18.5%	0.0%	£16	20.6%		£14		£14		£14	20.6%	plus	£14	20.6%	plus	£14	20.6%	plus	£14
535	P40100	Beacon Primary Academy	15.9%	0.0%	£0	19.1%	0.0%	£0	0.0%	£0	0.0%	£0	19.1%	plus	£0	19.1%	plus	£0	19.1%	plus	£0
536	P40101	Weston St Marys Primary School	16.3%	0.0%	£1	20.2%		£1		£1		£1	20.2%	plus	£1	20.2%	plus	£1	20.2%	plus	£1
539	P40104	Holbeach Primary Academy	17.2%	0.0%	£10	20.4%		£12		£12		£12	20.4%	plus	£12	20.4%	plus	£12	20.4%	plus	£12
542	P40107	Lincoln UTC	17.6%	0.0%	£0	18.7%		£7		£7		£7	18.7%	plus	£7	18.7%	plus	£7	18.7%	plus	£7
543	P40108	Lincoln St Giles Academy	18.2%	0.0%	£29	19.5%		£29		£30		£30	19.5%	plus	£29	19.5%	plus	£30	19.5%	plus	£30
701	P40039	Witham St Hughs Academy	17.6%	0.0%	£4	20.3%		£2		£2		£2	20.3%	plus	£2	20.3%	plus	£2	20.3%	plus	£2
702	P40041	Gainsborough Benjamin Adlard Community School	18.6%	0.0%	£0	20.4%	-1.8%	£0	-1.8%	£0	-1.8%	£0	18.6%	plus	£0	18.6%	plus	£0	18.6%	plus	£0
703	P40040	Washington Academy	19.3%	0.0%	£0	21.0%		£6		£6		£6	21.0%	plus	£6	21.0%	plus	£6	21.0%	plus	£6
704	P40038	Ruskington Chestnut Street C of E Primary School	19.5%	0.0%	£22	20.6%		£23		£23		£24	20.6%	plus	£23	20.6%	plus	£23	20.6%	plus	£24
705	P40042	Long Bennington Church of England Academy	19.7%	0.0%	£6	21.6%		£9		£10		£10	21.6%	plus	£9	21.6%	plus	£10	21.6%	plus	£10
706	P40049	Boston West Academy	19.2%	0.0%	£0	21.0%	-1.8%	£0	-1.8%	£0	-1.8%	£0	19.2%	plus	£0	19.2%	plus	£0	19.2%	plus	£0
707	P40043	Lincoln Manor Leas Infants School	19.3%	0.0%	£2	21.0%	0.0%	£0	0.0%	£0	0.0%	£0	21.0%	plus	£0	21.0%	plus	£0	21.0%	plus	£0
708	P40045	Gainsborough Hillcrest Early Years Academy	16.9%	0.2%	£8	19.4%		£12		£12		£12	19.4%	plus	£12	19.4%	plus	£12	19.4%	plus	£12
709	P40044	Rauceby Church of England Primary School	19.6%	0.0%	£6	22.2%		£6		£6		£6	22.2%	plus	£6	22.2%	plus	£6	22.2%	plus	£6
710	P40046	Grantham National Church of England Junior School	19.2%	0.0%	£14	20.6%		£17		£17		£18	20.6%	plus	£17	20.6%	plus	£17	20.6%	plus	£18
711	P40050	Harrowby Church of England Infant School	18.6%	0.0%	£5	20.6%		£2		£2		£2	20.6%	plus	£2	20.6%	plus	£2	20.6%	plus	£2
712	P40051	Branston Junior Academy	19.2%	0.0%	£12	21.9%		£14		£14		£14	21.9%	plus	£14	21.9%	plus	£14	21.9%	plus	£14
713	P40052	Woodhall Spa St Andrews Church of England	17.8%	0.5%	£5	20.4%		£1		£1		£1	20.4%	plus	£1	20.4%	plus	£1	20.4%	plus	£1
714	P40079	Stamford St Gilberts Church of England Primary	18.6%	0.0%	£8	21.0%		£10		£10		£11	21.0%	plus	£10	21.0%	plus	£10	21.0%	plus	£11

Employer / Pool code	Aggresso code	Employer/Pool name	Contributions in payment (2019/2020)			Primary rate % 1 April 2020 2023	Secondary Rate						Total Contribution Rate								
			Primary %	Secondary rate			2020/2021		2021/2022		2022/2023		2020/2021		2021/2022		2022/2023				
				(%)	(£000)		(%)	(£000)	(%)	(£000)	(%)	(£000)	(%)	(£000)	% of pay	(£000)	% of pay	(£000)	% of pay	(£000)	
Academies (cont.)																					
717	P40055	Kesteven and Grantham Academy	19.1%	0.0%	£37	21.4%		£33		£34		£35	21.4%	plus	£33	21.4%	plus	£34	21.4%	plus	£35
718	P40056	Donington Thomas Cowley High School	19.0%	0.0%	£28	20.8%		£18		£18		£19	20.8%	plus	£18	20.8%	plus	£18	20.8%	plus	£19
719	P40057	Gainsborough Parish Church Academy	18.5%	0.0%	£13	20.3%		£12		£12		£12	20.3%	plus	£12	20.3%	plus	£12	20.3%	plus	£12
720	P40058	Louth Kidgate Academy	17.4%	0.0%	£10	19.6%		£11		£11		£12	19.6%	plus	£11	19.6%	plus	£12	19.6%	plus	£12
721	P40059	Scothern Ellison Boulters Church of England Academy	20.0%	0.0%	£4	20.3%		£1		£1		£2	20.3%	plus	£1	20.3%	plus	£1	20.3%	plus	£2
722	P40060	William Lovell Church of England Academy	19.9%	0.0%	£29	21.0%		£28		£28		£29	21.0%	plus	£28	21.0%	plus	£28	21.0%	plus	£29
724	P40062	The Skegness Junior Academy	18.7%	0.0%	£7	20.9%		£6		£6		£7	20.9%	plus	£6	20.9%	plus	£6	20.9%	plus	£7
725	P40063	The Ingoldmells Academy	18.7%	0.0%	£5	20.1%		£1		£2		£2	20.1%	plus	£1	20.1%	plus	£2	20.1%	plus	£2
726	P40064	Nettleham Infants School	19.1%	0.0%	£7	19.9%		£11		£12		£12	19.9%	plus	£11	19.9%	plus	£12	19.9%	plus	£12
730	P40068	Mablethorpe Primary Academy	19.2%	0.0%	£13	20.8%		£13		£14		£14	20.8%	plus	£13	20.8%	plus	£14	20.8%	plus	£14
731	P40069	The Skegness Infant Academy	18.1%	0.0%	£11	20.4%		£11		£11		£12	20.4%	plus	£11	20.4%	plus	£11	20.4%	plus	£12
733	P40071	Welbourn Sir William Robertson Academy	18.7%	0.0%	£25	21.0%		£20		£20		£21	21.0%	plus	£20	21.0%	plus	£20	21.0%	plus	£21
734	P40070	Little Gonerby Church of England Infants School	19.6%	0.0%	£5	21.2%		£2		£2		£3	21.2%	plus	£2	21.2%	plus	£2	21.2%	plus	£3
735	P40072	Huttoft Primary School	18.7%	0.0%	£0	19.7%	0.0%	£0	0.0%	£0	0.0%	£0	19.7%	plus	£0	19.7%	plus	£0	19.7%	plus	£0
851	P40048	Gainsborough Academy	18.8%	0.0%	£0	20.5%	0.0%	£0	0.0%	£0	0.0%	£0	20.5%	plus	£0	20.5%	plus	£0	20.5%	plus	£0
856	P40001	Sleaford St Georges Academy	19.1%	0.0%	£0	20.9%	0.0%	£0	0.0%	£0	0.0%	£0	20.9%	plus	£0	20.9%	plus	£0	20.9%	plus	£0
860	P40002	Skegness Academy	18.4%	0.0%	£26	20.0%		£15		£16		£16	20.0%	plus	£15	20.0%	plus	£16	20.0%	plus	£16
863	P40004	West Grantham Federation	18.6%	0.0%	£11	20.2%		£14		£14		£15	20.2%	plus	£14	20.2%	plus	£14	20.2%	plus	£15
864	P40005	Giles Academy	17.4%	0.0%	£6	19.5%		£7		£7		£7	19.5%	plus	£7	19.5%	plus	£7	19.5%	plus	£7
865	P40006	Alford Queen Elizabeth Selective Academy	19.5%	0.0%	£0	21.2%	0.0%	£0	0.0%	£0	0.0%	£0	21.2%	plus	£0	21.2%	plus	£0	21.2%	plus	£0
866	P40007	Caistor Grammar	18.7%	0.0%	£1	21.0%	0.0%	£0	0.0%	£0	0.0%	£0	21.0%	plus	£0	21.0%	plus	£0	21.0%	plus	£0
867	P40008	Branston Community Academy	19.1%	0.0%	£0	20.9%	0.0%	£0	0.0%	£0	0.0%	£0	20.9%	plus	£0	20.9%	plus	£0	20.9%	plus	£0
868	P40009	Bourne Abbey C of E Academy	19.0%	0.0%	£3	20.9%		£10		£10		£10	20.9%	plus	£10	20.9%	plus	£10	20.9%	plus	£10
869	P40010	Welton William Farr CE Comprehensive School	19.2%	0.0%	£49	21.4%		£35		£35		£36	21.4%	plus	£35	21.4%	plus	£35	21.4%	plus	£36
870	P40012	Grantham Walton Girls	19.8%	0.0%	£11	21.2%		£10		£10		£10	21.2%	plus	£10	21.2%	plus	£10	21.2%	plus	£10
871	P40013	Lincoln Castle Academy	19.4%	0.0%	£18	21.1%		£19		£20		£20	21.1%	plus	£19	21.1%	plus	£20	21.1%	plus	£20
872	P40011	Market Rasen De Aston School (Academy)	18.8%	0.0%	£3	20.7%	0.0%	£0	0.0%	£0	0.0%	£0	20.7%	plus	£0	20.7%	plus	£0	20.7%	plus	£0
873	P40014	Tower Road Academy (Primary)	19.5%	0.0%	£17	20.3%		£5		£5		£5	20.3%	plus	£5	20.3%	plus	£5	20.3%	plus	£5
874	P40015	Fosse Way Academy	19.0%	0.0%	£10	20.7%	0.0%	£0	0.0%	£0	0.0%	£0	20.7%	plus	£0	20.7%	plus	£0	20.7%	plus	£0
875	P40017	North Kesteven School	18.7%	0.0%	£65	21.6%		£58		£60		£62	21.6%	plus	£58	21.6%	plus	£60	21.6%	plus	£62
876	P40019	Sir Robert Pattinson Academy	18.8%	0.0%	£22	20.6%		£25		£25		£26	20.6%	plus	£25	20.6%	plus	£25	20.6%	plus	£26
877	P40022	John Spendluffe Technology College	18.8%	0.0%	£26	20.7%		£20		£20		£21	20.7%	plus	£20	20.7%	plus	£20	20.7%	plus	£21
878	P40018	Sleaford Carres Grammar School (Academy)	19.3%	0.0%	£30	21.2%		£36		£37		£38	21.2%	plus	£36	21.2%	plus	£37	21.2%	plus	£38
879	P40020	Grantham Kings School	19.9%	0.0%	£13	21.6%		£2		£2		£2	21.6%	plus	£2	21.6%	plus	£2	21.6%	plus	£2
881	P40016	Ermine Primary Academy	18.5%	0.0%	£9	20.3%		£10		£10		£10	20.3%	plus	£10	20.3%	plus	£10	20.3%	plus	£10
882	P40023	Caistor Yarborough Academy	17.9%	0.0%	£9	20.0%		£3		£3		£3	20.0%	plus	£3	20.0%	plus	£3	20.0%	plus	£3
883	P40024	Bourne Academy	19.4%	0.0%	£23	21.1%		£13		£14		£14	21.1%	plus	£13	21.1%	plus	£14	21.1%	plus	£14
884	P40025	Lincoln Westgate Academy	18.4%	0.0%	£6	20.5%		£3		£3		£3	20.5%	plus	£3	20.5%	plus	£3	20.5%	plus	£3
885	P40026	Lincoln Christs Hospital School (Academy)	19.5%	0.0%	£30	21.2%		£33		£34		£35	21.2%	plus	£33	21.2%	plus	£34	21.2%	plus	£35

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			Primary %	Secondary rate			2020/2021		2021/2022		2022/2023		2020/2021		2021/2022		2022/2023				
				(%)	(£000)		(%)	(£000)	(%)	(£000)	(%)	(£000)	(%)	(£000)	% of pay	(£000)	% of pay	(£000)	% of pay	(£000)	
Academies (cont.)																					
886	P40027	University Academy Holbeach	19.1%	0.0%	£40	20.9%		£39		£40		£41	20.9%	plus	£39	20.9%	plus	£40	20.9%	plus	£41
887	P40028	Mount Street Academy	17.6%	0.0%	£11	20.2%		£10		£10		£10	20.2%	plus	£10	20.2%	plus	£10	20.2%	plus	£10
888	P40029	Sleaford William Alvey	18.9%	0.0%	£4	20.4%		£2		£2		£2	20.4%	plus	£2	20.4%	plus	£2	20.4%	plus	£2
890	P40036	Hartsholme Academy	16.1%	0.0%	£5	17.8%		£10		£10		£10	17.8%	plus	£10	17.8%	plus	£10	17.8%	plus	£10
891	P40031	Kesteven & Sleaford High School Selective Academy	19.0%	0.0%	£18	21.2%		£18		£18		£18	21.2%	plus	£18	21.2%	plus	£18	21.2%	plus	£18
892	P40032	Keystone Academy	19.5%	0.0%	£9	21.2%		£3		£3		£3	21.2%	plus	£3	21.2%	plus	£3	21.2%	plus	£3
893	P40030	Stamford Welland Academy	20.6%	0.0%	£0	21.7%	-1.1%	£0	-1.1%	£0	-1.1%	£0	20.6%	plus	£0	20.6%	plus	£0	20.6%	plus	£0
894	P40033	Stamford Malcolm Sargent Primary	18.5%	0.0%	£0	20.8%	0.0%	£0	0.0%	£0	0.0%	£0	20.8%	plus	£0	20.8%	plus	£0	20.8%	plus	£0
895	P40034	Bourne Grammar	19.0%	0.0%	£31	21.3%		£29		£30		£31	21.3%	plus	£29	21.3%	plus	£30	21.3%	plus	£31
896	P40035	St. John's Primary Academy	18.8%	0.0%	£16	21.1%		£13		£14		£14	21.1%	plus	£13	21.1%	plus	£14	21.1%	plus	£14
897	P40037	The Deepings School	19.7%	0.0%	£0	21.1%	-1.4%	£0	-1.4%	£0	-1.4%	£0	19.7%	plus	£0	19.7%	plus	£0	19.7%	plus	£0
40112	P40112	Keelby Primary Academy	19.7%	0.0%	£11	21.4%		£14		£14		£14	21.4%	plus	£14	21.4%	plus	£14	21.4%	plus	£14
40114	P40114	Lincoln Anglican Academy Trust	16.4%	0.0%	£0	17.7%	-1.3%	£0	-1.3%	£0	-1.3%	£0	16.4%	plus	£0	16.4%	plus	£0	16.4%	plus	£0
40115	P40115	Somercotes Academy	18.5%	0.0%	£28	18.7%		£28		£29		£29	18.7%	plus	£28	18.7%	plus	£29	18.7%	plus	£29
40116	P40116	King Edward VI Grammar School (Louth)	19.0%	0.0%	£44	21.3%		£55		£57		£58	21.3%	plus	£55	21.3%	plus	£57	21.3%	plus	£58
40117	P40117	St Lawrence School (Horncastle)	17.2%	0.0%	£30	19.3%		£28		£29		£29	19.3%	plus	£28	19.3%	plus	£29	19.3%	plus	£29
40119	P40119	St Bernards School (Louth)	19.0%	0.0%	£59	19.7%		£55		£56		£58	19.7%	plus	£55	19.7%	plus	£56	19.7%	plus	£58
40120	P40120	Aegir Specialist Academy	19.0%	0.0%	£35	21.0%		£37		£38		£39	21.0%	plus	£37	21.0%	plus	£38	21.0%	plus	£39
40121	P40121	Warren Wood Specialist Academy	19.5%	0.0%	£34	20.5%		£24		£25		£26	20.5%	plus	£24	20.5%	plus	£25	20.5%	plus	£26
40126	P40126	Spilsby Primary School	18.5%	0.0%	£10	21.2%		£25		£26		£26	21.2%	plus	£25	21.2%	plus	£26	21.2%	plus	£26
40127	P40127	Gosberton House Academy	18.6%	0.0%	£23	18.9%		£21		£22		£22	18.9%	plus	£21	18.9%	plus	£22	18.9%	plus	£22
40128	P40128	Theddlethorpe Primary School	21.5%	0.0%	£6	21.2%		£3		£3		£3	21.2%	plus	£3	21.2%	plus	£3	21.2%	plus	£3
40129	P40129	South Witham Academy	20.6%	0.0%	£7	21.5%		£8		£8		£8	21.5%	plus	£8	21.5%	plus	£8	21.5%	plus	£8
40131	P40131	Browns Church of England Primary School	21.7%	0.0%	£5	21.9%		£2		£2		£3	21.9%	plus	£2	21.9%	plus	£2	21.9%	plus	£3
40133	P40133	Edenham Church of England School	21.3%	0.0%	£8	21.8%		£6		£6		£6	21.8%	plus	£6	21.8%	plus	£6	21.8%	plus	£6
40134	P40134	Morton Church of England Primary School	20.8%	0.0%	£16	21.0%		£12		£12		£12	21.0%	plus	£12	21.0%	plus	£12	21.0%	plus	£12
40143	P40143	Manor Farm Academy	17.4%	0.0%	£0	18.7%		£0		£0		£0	18.7%	plus	£0	18.7%	plus	£0	18.7%	plus	£0
40148	P40148	Branston C of E Infants School	20.5%	0.0%	£3	20.8%		£2		£2		£2	20.8%	plus	£2	20.8%	plus	£2	20.8%	plus	£2
40149	P40149	Whaplode C of E Primary School	19.9%	0.0%	£4	20.6%		£6		£6		£6	20.6%	plus	£6	20.6%	plus	£6	20.6%	plus	£6
40151	P40151	The Marton Academy	20.5%	0.0%	£5	21.4%		£5		£6		£6	21.4%	plus	£5	21.4%	plus	£6	21.4%	plus	£6
40153	P40153	Holy Trinity Church of England Primary	20.1%	0.0%	£6	21.2%		£6		£6		£6	21.2%	plus	£6	21.2%	plus	£6	21.2%	plus	£6
40154	P40154	Bassingham Primary School	20.8%	0.0%	£8	22.0%		£8		£8		£8	22.0%	plus	£8	22.0%	plus	£8	22.0%	plus	£8
40156	P40156	St Michaels Church of England Primary School	19.7%	0.0%	£9	20.1%		£14		£14		£15	20.1%	plus	£14	20.1%	plus	£14	20.1%	plus	£15
40157	P40157	All Saints Academy Waddington	19.8%	0.0%	£7	21.1%		£9		£9		£9	21.1%	plus	£9	21.1%	plus	£9	21.1%	plus	£9
40160	P40160	Holbeach Bank Academy	19.8%	0.0%	£1	20.7%		£2		£2		£2	20.7%	plus	£2	20.7%	plus	£2	20.7%	plus	£2
40166	P40166	Boston St Mary's RC Primary Academy	18.6%	0.0%	£2	20.3%		£4		£4		£4	20.3%	plus	£4	20.3%	plus	£4	20.3%	plus	£4
40167	P40167	St Mary's Catholic Primary Voluntary Academy	20.1%	0.0%	£4	21.2%		£7		£7		£7	21.2%	plus	£7	21.2%	plus	£7	21.2%	plus	£7
40168	P40168	St Norberts Catholic Primary School (Academy)	19.1%	0.0%	£1	20.5%		£3		£3		£3	20.5%	plus	£3	20.5%	plus	£3	20.5%	plus	£3

Employer / Pool code	Agresso code	Employer/Pool name	Contributions in payment (2019/2020)			Primary rate % 1 April 2020 2023	Secondary Rate						Total Contribution Rate								
			Primary %	Secondary rate			2020/2021		2021/2022		2022/2023		2020/2021		2021/2022		2022/2023				
				(%)	(£000)		(%)	(£000)	(%)	(£000)	(%)	(£000)	(%)	(£000)	% of pay	(£000)	% of pay	(£000)	% of pay	(£000)	
Academies (cont.)																					
Pool		CIT Academies	see below			19.9%		£216		£221		£227	19.9%	plus	£216	19.9%	plus	£221	19.9%	plus	£227
		- Grantham Sandon School	18.5%	0.0%	£31																
		- Grantham Ambergate School	18.0%	0.0%	£27																
		- Grantham Isaac Newton Primary School	19.3%	0.0%	£13																
		- The Phoenix Academy	18.9%	0.0%	£11																
		- The John Fielding Special School, Boston	17.9%	0.0%	£28																
		- The Garth School, Spalding	18.2%	0.0%	£24																
		- The Priory School, Spalding	18.4%	0.0%	£19																
		- Woodlands Academy	19.9%	0.0%	£34																
		- Caythorpe Primary	19.7%	0.0%	£5																
		- Chapel St Leonards Primary School	20.2%	0.0%	£6																
		- Poplar Farm School	17.2%	0.0%	£0																
Pool		Priory Academy Schools	see below			20.3%	0.0%	£0	0.0%	£0	0.0%	£0	20.3%	plus	£0	20.3%	plus	£0	20.3%	plus	£0
		- Grantham Huntingtower Community Primary	17.9%	3.0%	£0																
		- North Hykeham Ling Moor Academy	19.1%	0.0%	£7																
		- Priory Federation of Academies	18.2%	0.0%	£0																
		- Heighington Millfield Primary Academy	18.9%	0.0%	£3																
		- The Priory Pembroke	20.1%	0.0%	£15																
		- Redwood Primary School	20.5%	0.0%	£4																
Pool		Horncastle Education Trust	see below			20.2%		£66		£68		£70	20.2%	plus	£66	20.2%	plus	£68	20.2%	plus	£70
		- Horncastle Queen Elizabeth Grammar School	18.9%	0.0%	£23																
		- Horncastle Bannoallum	18.4%	0.0%	£38																
		- Frithville Primary School	19.1%	0.0%	£2																
		- New York Primary School	18.5%	0.0%	£1																
Pool		David Ross	18.0%	0.0%	£152	20.4%		£112		£115		£118	20.4%	plus	£112	20.4%	plus	£115	20.4%	plus	£118
		- Spilsby Eresby School																			
		- Grantham Charles Read Academy																			
		- Tattershall Barnes Wallis Academy																			
		- Hogsthorpe Community Primary Academy																			
		- Spilsby King Edward IV Academy																			
		- Skegness Grammar Academy																			
		- Ingoldsby Academy																			
		- Thomas Middlecott Academy																			
Pool		Tall Oaks	18.5%	0.0%	£9	20.3%		£11		£11		£11	20.3%	plus	£11	20.3%	plus	£11	20.3%	plus	£11
		- Mercer's Wood Academy																			
		- Whites Wood Academy																			
		- Castle Wood Academy (Gainsborough)																			
Pool		Tollbar MAT (Louth Academy)	see below			20.5%		£43		£44		£45	20.5%	plus	£43	20.5%	plus	£44	20.5%	plus	£45
		- Louth Cordeaux Academy	18.4%	0.0%	£26																
		- Louth Academy	19.4%	0.0%	£46																
Pool		BWAF	see below			19.4%		£28		£29		£29	19.4%	plus	£28	19.4%	plus	£29	19.4%	plus	£29
		- Phoenix Family of Schools	18.2%	0.0%	£0																
		- Boston Witham Academies Federation	17.7%	0.5%	£57																
Pool		Wellspring Academy Trust	see below			19.4%		£37		£38		£39	19.4%	plus	£37	19.4%	plus	£38	19.4%	plus	£39
		- Springwell Lincoln City Academy	18.5%	0.0%	£10																
		- Lacey Gardens Junior School (Academy)	18.5%	0.0%	£11																
		- Eastfield Infant and Nursery School (Academy)	19.5%	0.0%	£12																

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			Primary %	Secondary rate			2020/2021		2021/2022		2022/2023		2020/2021		2021/2022		2022/2023			
				(%)	(£000)		Secondary rate (%)	(£000)	Secondary rate (%)	(£000)	Secondary rate (%)	(£000)	Secondary rate (%)	(£000)	% of pay	(£000)	% of pay	(£000)	% of pay	(£000)
Resolution Bodies																				
523	P30077	BG Lincoln Ltd	20.7%	0.0%	£2	22.8%		£1		£1		£1	22.8%	plus	£1	22.8%	plus	£1		
861	P30072	Public Sector Partnership Services Ltd.	21.8%	0.0%	£0	19.9%		£91		£93		£96	19.9%	plus	£91	19.9%	plus	£93		
Pool																				
		Small Scheduled Bodies Pool	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Billingham Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Bourne Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Bracebridge Heath Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Cherry Willingham Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Crowland Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Deeping St James Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Gainsborough Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Gedney Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Greetwell Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Horncastle Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Ingoldmells Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Louth Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Mablethorpe & Sutton Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Market Deeping Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Nettleham Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		North Hykeham Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Pinchbeck Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Skegness Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Skellingthorpe Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Sleaford Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Stamford Town Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Sudbrooke Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Sutton Bridge Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Washingborough Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Welton-By-Lincoln Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
		Woodhall Spa Parish Council	19.3%	2.3%	£0	21.1%	1.4%		1.4%		1.4%		22.5%	plus	£0	22.5%	plus	£0		
Transferee Admission Bodies																				
547	P20028	Magna Vitae Leisure Trust	14.9%	0.0%	£0	21.1%	-4.6%	£0	-4.6%	£0	-4.6%	£0	16.5%	plus	£0	16.5%	plus	£0		
826	P20019	Active Nation	26.9%	0.0%	£6	33.1%	0.0%	£0	0.0%	£0	0.0%	£0	33.1%	plus	£0	33.1%	plus	£0		
889	P20023	Edwards and Blake Ltd	25.9%	0.0%	£5	32.7%	0.0%	£5	0.0%	£5	0.0%	£5	32.7%	plus	£5	32.7%	plus	£5		
20027	P20027	Making Space	22.0%	0.0%	£0	30.4%	0.0%	£0	0.0%	£0	0.0%	£0	30.4%	plus	£0	30.4%	plus	£0		
20030	P20030	Vinci Construction UK Limited	28.8%	0.0%	£0	35.2%	-35.2%	£0	0.0%	£0	0.0%	£0	0.0%	plus	£0	35.2%	plus	£0		
20036	P20036	Compass Contract Services(UK) Ltd	30.2%	0.0%	£0	31.8%	-31.8%	£0	0.0%	£0	0.0%	£0	0.0%	plus	£0	31.8%	plus	£0		
20037	P20037	Future Cleaning Services	29.1%	0.0%	£0	32.8%	-2.5%	£0	0.0%	£0	0.0%	£0	30.3%	plus	£0	32.8%	plus	£0		
20038	P20038	Taylor Shaw (Branston Academy)	31.3%	0.0%	£0	33.9%	-2.2%	£0	0.0%	£0	0.0%	£0	31.7%	plus	£0	33.9%	plus	£0		
20043	P20043	Easy Clean Contractors (Lincolnfield)	30.4%	0.0%	£0	31.7%	-31.7%	£0	0.0%	£0	0.0%	£0	0.0%	plus	£0	31.7%	plus	£0		
20044	P20044	Cater Link (West Grantham Academy)	32.2%	0.0%	£0	32.1%	-32.1%	£0	0.0%	£0	0.0%	£0	0.0%	plus	£0	32.1%	plus	£0		
20045	P20045	Outspoken Training	31.5%	0.0%	£0	35.5%	-15.6%	£0	0.0%	£0	0.0%	£0	19.9%	plus	£0	35.5%	plus	£0		
20049	P20049	Easy Clean (Baston Primary)	37.3%	0.0%	£0	33.7%	0.0%	£2	0.0%	£2	0.0%	£2	33.7%	plus	£2	33.7%	plus	£2		
20050	P20050	Nightingale Cleaning Limited	30.4%	0.0%	£0	32.3%	0.0%	£0	0.0%	£0	0.0%	£0	32.3%	plus	£0	32.3%	plus	£0		
20055	P20055	Mellors Catering	29.2%	0.0%	£0	25.7%	0.0%	£1	0.0%	£1	0.0%	£1	25.7%	plus	£1	25.7%	plus	£1		

Further comments

- Contributions expressed as a percentage of payroll should be paid into Lincolnshire Pension Fund (“the Fund”) at a frequency in accordance with the requirements of the Regulations;
- Further sums should be paid to the Fund to meet the costs of any early retirements and/or augmentations using methods and factors issued by us from time to time or as otherwise agreed.
- Payments may be required to be made to the Fund by employers to meet the capital costs of any ill-health retirements that exceed those allowed for within our assumptions. If an employer has ill health liability insurance in place with a suitable insurer and provides satisfactory evidence to the Administering Authority, then their certified contribution rate may be reduced by the value of their insurance premium, for the period the insurance is in place.
- The certified contribution rates represent the **minimum** level of contributions to be paid. Employing authorities may pay further amounts at any time and future periodic contributions may be adjusted on a basis approved by the Fund Actuary.

Signature:

SIGNATURE**SIGNATURE**

Name:

Peter Summers

Anne Cranston

Qualification:

Fellow of the Institute and Faculty of Actuaries

Associate of the Institute and Faculty of Actuaries

Firm:

Hymans Robertson LLP
 20 Waterloo Street
 Glasgow
 G2 6DB

Date:

4 March 2020

Appendix 4 – Section 13 dashboard

TBC

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DRAFT



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Open Report on behalf of Andrew Crookham, Executive Director - Resources

Report to:	Lincolnshire Pension Board
Date:	19 March 2020
Subject:	Lincolnshire Pension Fund Policies Review

Summary:

This report brings to the Board the main policies of the Pension Fund for review.

Recommendation(s):

That the Board consider and note the report and the policies attached.

Background

- Under the various Local Government Pension Scheme Regulations, the Pensions Committee, as the Administering Authority of the Lincolnshire Pension Scheme, is required to produce and maintain a number of key policy documents. Policies are brought to the Board annually, and the last comprehensive review was March 2019. This report presents the latest version of these policies for them to be considered by the Board.

Policies for Approval

- The key policies to be reviewed and approved are set out as Annexes to this report. Any significant changes will be brought to the Board's attention and explained during the meeting.

Appendix A – Investment Strategy Statement

- The Investment Strategy Statement (ISS) sets out the Fund's approach to the investment of the Fund's assets, in accordance with the guidance issued by the Secretary of State.
- Updates are:
 - The addition of the Pensions Committee's investment beliefs.
 - The change to the strategic asset allocation that is being implemented as the Fund transitions to Border to Coast – reducing equity assets and increasing diversifying growth assets.
 - The March 2019 valuation assumptions.

- The asset pooling expectations.
- The addition of the Pension Committee's responsible investment beliefs.

Appendix B – Communications Policy

5. The Communications Policy sets out how the Fund intends to communicate with members, prospective members and employers, including the format, frequency and method of distributing any information or publicity. The Lincolnshire Pension Fund works with West Yorkshire Pension Fund to deliver the administration service to the scheme members and employers.
6. Updates are:
 - Amendments to number of employers and scheme members.

Appendix C - Governance Policy and Compliance Statement

7. The Governance Policy sets out the arrangements for the management of the Pension Fund, and the Compliance Statement sets out the extent that this policy complies with best practice, on a comply or explain basis.
8. Within the compliance statement, the areas where the Fund is only partially compliant are detailed below:
 - Principle A – Structure – (b) – the Committee does not include representatives for pensioner or deferred members.
 - Principle B – Representation – (a) - the Committee does not include representatives for pensioner or deferred members.
 - Principle E – Training/Facility Time/Expenses – (c) – the Committee has an annual training plan at Committee level, but not for individual members.
 - Principle H – Scope – (a) – The Committee does not have an independent observer for administration and governance issues.
9. Updates are:
 - The change of titles for officers.

Appendix D – Breaches Reporting Procedure

10. The Pension Regulator's Code of Practice requires all LGPS Funds to have a published procedure as to how breaches of the code will be dealt with and reported. The procedure details how individuals responsible for reporting and whistleblowing can identify, assess and report (or record if not reported) a breach of law relating to the Lincolnshire Pension Fund. It aims to ensure individuals responsible are able to meet their legal obligations, avoiding

placing any reliance on others to report. The procedure will also assist in providing an early warning of possible malpractice and reduce risk.

11. Updates are:

- The change of titles for officers.

Appendix E – Pension Fund Code of Conduct and Conflicts of Interest

12. The Pension Regulator's Code of Practice requires all LGPS Funds to have a published procedure as to how breaches of the code will be dealt with and reported. The procedure details how individuals responsible for reporting and whistleblowing can identify, assess and report (or record if not reported) a breach of law relating to the Lincolnshire Pension Fund. It aims to ensure individuals responsible are able to meet their legal obligations, avoiding placing any reliance on others to report. The procedure will also assist in providing an early warning of possible malpractice and reduce risk.

13. Updates are:

- The change of titles for officers.

Funding Strategy Statement

14. The FSS sets out the Fund's approach to managing its solvency and is generally updated every three years, in line with the Triennial Valuation. It is the framework that guides the Fund Actuary and informs the employers. This has been updated as part of the 2019 Valuation process and is at agenda item 9 of this meeting.

Stewardship Code Statement

15. The Financial Reporting Council (FRC) Stewardship Code has recently undergone a substantial revision to the 2012 Code, which came into effect on 1 January 2020. Organisations wanting to become signatories to the Code will be required to produce an annual Stewardship Report explaining how they have applied the Code in the previous 12 months, aligned to their financial year. The FRC will evaluate Reports against an assessment framework, and those that meet the reporting expectations will be listed as signatories to the Code. Organisations will have 90 days from their year-end to submit their statement for evaluation. Officers will review the new requirements, and update the current Stewardship Code Statement for the financial year to 31 March 2021, to meet the deadline of June 2021.

Conclusion

16. In accordance with the various Local Government Pension Scheme Regulations, the Fund has prepared a number of key policy documents. The ISS, Communications Policy, Governance Policy and Compliance

Statement, Breaches Reporting Procedure and Code of Conduct and Conflict of Interest Policy have been appended to this report for review and consideration by the Pension Board.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	LPF – Investment Strategy Statement
Appendix B	LPF - Communications Policy
Appendix C	LPF – Governance Compliance Statement
Appendix D	LPF – Breaches Reporting Procedure
Appendix E	LPF – Pension Fund Code of Conduct and Conflicts of Interest

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk.

Investment Strategy Statement

INVESTMENT STRATEGY STATEMENT

INTRODUCTION

The Lincolnshire Pension Fund (“the Fund”), which is administered by Lincolnshire County Council (“the Administering Authority”), is required to maintain an Investment Strategy Statement (“ISS”) in accordance with Regulation 7 of the Local Government Pension Fund (Management and Investment of Funds) Regulations 2016.

The Administering Authority has delegated all its functions as administering authority to the Pensions Committee (“the Committee”). The ISS has been agreed by the Committee having taken advice from the Investment Consultant and Pension Fund Manager.

The ISS, which was last approved by the Committee on 21 March 2019, is subject to review on an annual basis and without delay after any significant change in investment policy. The Committee has consulted on the contents of the Fund’s investment strategy with such persons it considers appropriate.

The Fund is also required to maintain a Funding Strategy Statements (“FSS”) in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013 (as amended). The FSS, which was last approved by the Pensions Committee on 19 March 2020, complies with these Regulations.

INVESTMENT STRATEGY

The primary objective of the Lincolnshire Pension Fund is to provide pension benefits for members on their retirement and/or benefits on death, whether before or after retirement, and for their dependents.

The Committee aims to fund the benefits in such a manner that, in normal market conditions, all accrued benefits are fully covered by the value of the Fund’s assets and that an appropriate level of contributions is agreed by the employers to meet the cost of future benefits accruing. For employee members, benefits will be based on service completed and final salary (pre 1 April 2014) and/or the accumulation of individual years built up through the career average pension scheme (post 1 April 2014) and will take account of future inflation increases. This funding position will be reviewed at each triennial actuarial valuation, or more frequently as required.

Investment Beliefs

These beliefs form the foundation of discussions, and assist decisions, regarding the structure of the Fund and the strategic asset allocation. In addition, they are used to ensure that new members on the Pensions Committee understand previous investment decisions taken.

Belief 1:

The Fund should take no more investment risk than is necessary to have a reasonable chance of achieving its objectives, and only where the Committee believes it will be rewarded over the longer term.

It is recognised that investment risk is needed in the Fund to generate the required returns, however this needs to be considered on an on-going basis to ensure it is appropriate (i.e. not too high or too low) given the Fund's objectives

Belief 2:

Funding and investment strategy are linked; as the funding position improves, the level of investment risk should be reduced.

As the Fund moves closer to full funding (i.e. 100% assets to meet liabilities on an appropriately prudent assumption of investment return) then it is expected that the level of risk will be adjusted accordingly.

Belief 3:

Investing in illiquid assets provides opportunities for enhancing returns, and investing in alternative asset classes helps to diversify the Fund structure.

The Committee accepts that by "locking away" funds for longer periods of time, the Fund should expect to be compensated for the lack of liquidity in the form of higher expected returns. However it is understood that this is not suitable for all the assets in the Fund. The Fund's investments should be diversified by combining assets with different risk, return and liquidity characteristics, whilst maintaining realistic expectations about the potential for sources of return to become correlated under market stress. The Committee believes an appropriate portion of the Fund should be invested in non-core asset classes, i.e. alternative assets, to provide diversification and reduce overall volatility of returns.

Belief 4:

Passive and active management both have roles to play in the Fund's structure; passive to deliver low cost asset class exposure and active to add potential value, understanding that active managers' success should be measured over a reasonable timeframe.

The Committee believes that active managers can add a return premium over investment markets, over the longer term, but accept that this has a cost. Therefore this is balanced with allocations to passive management to produce market returns at a very low cost.

Belief 5:

Environmental, social and governance (ESG) issues are important to the long term success of the Fund.

The Committee believes that it should act as a responsible owner across all of its investments and that ESG issues and considerations have a financial impact on the long term performance of the Fund. The Fund works with managers and other organisations to understand the potential impact of the risks and opportunities relating to ESG matters.

Belief 6:

Although fees and costs matter, it is the expected return net of all fees and costs that should be the Committee's focus, however transparency and understanding of costs is important.

The cost of accessing different asset classes and different management styles must be understood to ensure that the Fund is obtaining value for money, however the expected net return is the most important consideration when assessing investment opportunities and monitoring investment performance. The Fund expects its managers to have signed up to the Cost Transparency Code, and it also participates in fee benchmarking to assess the fees being paid relative to other pension schemes.

Investment of money in a wide variety of investments

It is the Pensions Committee's policy to invest the assets of the Lincolnshire Pension Fund to spread the risk by ensuring a reasonable balance between different categories of investments. The Pensions Committee takes a long term approach to investment and invests in asset classes and individual investments that are expected to generate an attractive risk-adjusted return for the Pension Fund.

The Fund may invest in a wide range of investments including quoted and unquoted assets in Equities, Fixed Income, Property and Alternatives, either directly or through pooled investments. The Fund may also make use of derivatives, either directly or in pooled investments, for the purpose of efficient portfolio management or to hedge specific risks.

The Fund's strategic asset allocation is set out below. The table also includes the ranges within which the asset allocation may vary without reference to the Pensions Committee, and the maximum percentage of total Fund value that can be invested in these asset classes. The asset allocation is consistent with the Committee's views on the appropriate balance between generating a satisfactory long-term return on investments, whilst taking account of market risk and the nature of the Fund's liabilities.

Asset class	Strategic allocation	Range	Maximum
Equity Assets	60%	+/- 6%	66%
UK equities	20%	+/- 2%	22%
Global equities	40%	+/- 5.5%	45.5%
Diversifying Growth Assets	26.5%	+/- 4.5%	31%
Alternatives	15%	+/- 1.5%	16.5%
Property	9%	+/- 1.5%	10.5%
Infrastructure	2.5%	+/- 1.5%	4%
Protection Assets	13.5%	+/- 2%	15.5%
Fixed Income	13.5%	+/- 1.5%	15%
Cash	0%	+/- 0.5%	0.5%

The asset allocation below reflects the changes approved by the Committee however these will be implemented as the Fund transitions its assets to Border to Coast.

Asset class	Strategic allocation	Range	Maximum
Equity Assets	55%*	+/- 7%	62%
UK equities	15%*	+/- 2%	17%
Global equities	40%	+/- 5%	45%
Diversifying Growth Assets	31.5%*	+/- 4.5%	36%
Diversified Alternatives (incl. infrastructure and multi asset credit)	21%*	+/- 3%	24%
Property	10.5%	+/- 1.5%	12%
Protection Assets	13.5%	+/- 2%	15.5%
Fixed Income	12.5%	+/- 1.5%	14%
Cash	1%	+/- 0.5%	1.5%

The Regulations do not permit more than 5% of the Fund's value to be invested in entities which are connected with that authority within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007(e). The investment policy of the Fund does not permit any employer-related investment, other than is necessary to meet the regulatory requirements with regards to pooling.

The Pensions Committee believes that the Fund's portfolio is adequately diversified, and has taken professional advice to this effect from their investment consultant and independent advisor.

The strategic asset allocation includes ranges for each asset class within which the asset allocation can vary. In the event that any asset class range is breached, the

Pensions Committee will be informed and the Fund’s officers will endeavour to bring the asset allocation back within the range within an appropriate period of time.

The Pensions Committee reviews the suitability of the asset allocation of the Fund on a quarterly basis, following advice from the officers, investment consultant and independent advisor.

It is intended that the Fund’s investment strategy will be reviewed at least every three years, following the latest actuarial valuation of the Fund. The investment strategy takes due account of the maturity profile of the Fund and the current funding position.

The Pensions Committee has set the following benchmark against which performance of the Fund will be measured:

Asset class	Benchmark
Equities	
UK Equities	FTSE All Share
Global Equities (ex UK)	MSCI World ex UK Index
Global Equities	MSCI All Countries World Index
Bonds	
UK Gilts Over 5 Years	FTSE UK Gilts Index-Linked Over 5 Years Index
Corporate Bonds	iBoxx £ Non-Gilts Index
All Stocks UK Gilt Index Fund	FTSE UK Gilts Index-Linked All Stocks Index
Corporate Bonds up to 5 Years	iBoxx Sterling Non-Gilts 1-5 Year Index
Property	
Property Venture	7% Per Annum
Property Unit Trusts	UK IPD Monthly Index
Infrastructure	6% Per Annum
Alternatives	LIBOR 3 Months + 4%

The suitability of particular investments and types of investments

The actuarial valuation, at 31 March 2019, was prepared on the basis of an expected investment return of 4% p.a., based on a 71% likelihood of that return being achieved over the next 20 years, and assuming inflation (CPI) to be 2.3%. The Pensions Committee has set the investment objective of producing a long term return of 0.75% p.a. above the strategic benchmark.

In order to monitor the investment objective, the Pensions Committee requires the provision of detailed performance measurement of the Fund's investments. This is provided by the Fund’s custodian on a quarterly basis. In addition, the Pensions Committee conducts a formal annual performance review of overall fund performance.

The approach to risk

The Committee is aware that the Fund has a need to take risk to help it achieve its funding objectives. It has an active risk management programme in place that aims to help it identify the risks being taken and put in place processes to manage, measure, monitor and (where possible) mitigate the risks being taken. One of the Committee's overarching beliefs is to only take as much investment risk as is necessary.

The principal risks affecting the Fund are set out below:

Risk	Description	Mitigants
Market	Value of an investment decreases as a result of changing market conditions.	Strategic asset allocation, with suitable diversification and appropriate ranges, determined on a triennial basis. The Committee has put in place rebalancing arrangements to ensure the Funds actual allocation does not deviate substantially from its target.
Performance	The Fund's investment managers fail to deliver returns in line with the underlying asset classes.	Analysis of market performance and investment managers' performance relative to their index benchmark on a quarterly basis. Investment Mangers present to the Committee on an annual basis.
Valuation	Valuations disclosed in the financial statements, particularly for unquoted investments, are not reflective of the value that could be achieved on disposal.	The valuation of investments is derived using a conservative valuation methodology and, where applicable, market observable data.
Liquidity	The Fund is not able to meet its financial obligations as they fall due or can do so only at an excessive cost.	The Fund maintains sufficient liquid funds at all times to ensure that it can meet its financial obligations.
Interest rate	A change in interest rates will result in a change in the valuation of the Fund's assets	The Fund regularly monitors its exposure to interest rates, and may consider hedging

	and liabilities.	where appropriate.
Foreign exchange	An adverse movement in foreign exchange rates will impact on the value of the Fund's investments.	The Fund regularly monitors its foreign exchange exposure.
Demographic	Changes, such as increased longevity or ill-health retirement, will increase the value of the Fund's liabilities.	Demographic assumptions are conservative, regularly monitored, and reviewed on a triennial basis.
Regulatory	Changes to regulations and guidance may increase the cost of administering the Fund or increase the value of the Fund's liabilities.	The Fund ensures that it is aware of any actual or potential changes to regulations and guidance and will participate in consultations where appropriate.
Governance	The administering authority is unaware of changes to the Fund's membership which increases the value of its liabilities.	The Fund regularly monitors membership information and communicates with employers.

Approach to pooling investments

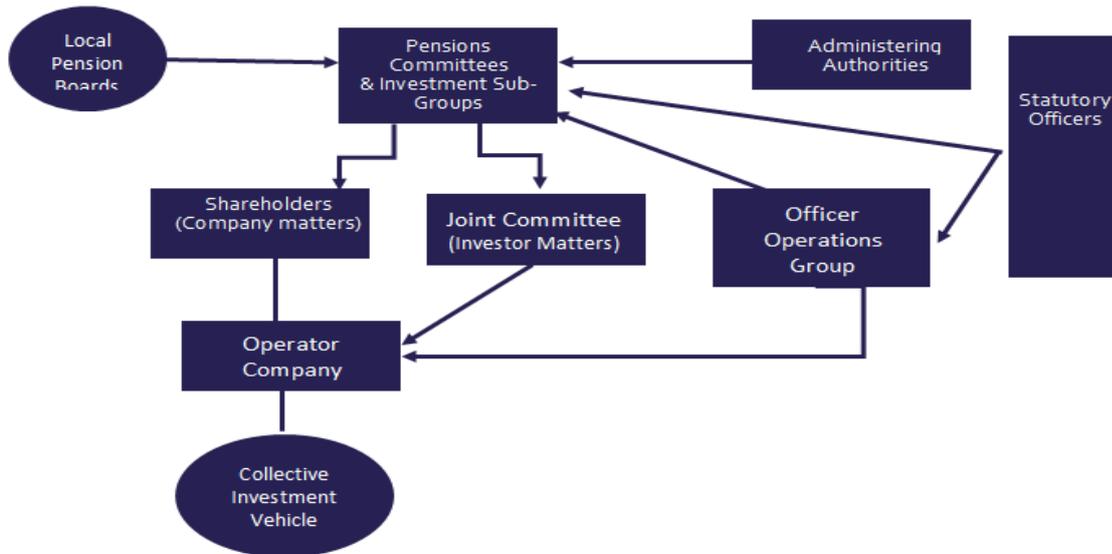
In order to satisfy the requirements of the "Local Government Pension Scheme: Investment Reform and Guidance" issued by the Department for Communities and Local Government ("DCLG") in November 2015, the Pension Fund has elected to become a shareholder in Border to Coast Pensions Partnership Limited (Border to Coast). Border to Coast is a FCA-regulated Operator and Alternative Investment Fund Manager ("AIFM").

Border to Coast is a partnership of the administering authorities of the following LGPS Funds:

- Bedfordshire Pension Fund
- Cumbria Pension Fund
- Durham Pension Fund
- East Riding Pension Fund
- Lincolnshire Pension Fund
- North Yorkshire Pension Fund
- Northumberland Pension Fund
- South Yorkshire Pension Fund

- Surrey Pension Fund
- Teesside Pension Fund
- Tyne and Wear Pension Fund
- Warwickshire Pension Fund

The governance structure of Border to Coast is as follows:



The Fund will hold Border to Coast to account through the following mechanisms:

- A representative on the Shareholder Board, with equal voting rights, who will provide oversight and control of the corporate operations of Border to Coast.
- A representative on the Joint Committee who will monitor and oversee the investment operations of Border to Coast.
- Officer support to the above representatives from the Officer Operations Group and the Statutory Officer Group.

The Pension Fund will retain the decision making powers regarding asset allocation and will delegate the investment management function to Border to Coast.

A significant proportion of the Fund’s investments will be made through Border to Coast. Where it is not practical or cost effective for assets to be transferred into the pool, they will continue to be managed at the Fund level. This is expected to predominantly include legacy unquoted investments such as limited partnerships. Whilst these assets may not be transferred, once these investments mature the proceeds will be reinvested into Border to Coast sub-funds. At the current time it is estimated that c. 70% of the Fund’s assets will be invested in Border to Coast subject to it having suitable management arrangements in place.

The Fund will perform an annual review of assets that are determined to be held outside to ensure that it continues to demonstrate value for money. Following this review it will submit a report on the progress of asset transfers to the Scheme Advisory Board, in line with the guidance.

Approach to environmental, social and corporate governance (ESG) factors

The Fund considers itself to be a responsible investor and take ESG matters very seriously and monitors investment managers' approach to ESG.

Responsible Investment Beliefs

These beliefs form the foundation of discussions, and assist decisions, regarding the structure of the Fund and the strategic asset allocation. In addition, they are used to ensure that new members on the Pensions Committee understand previous investment decisions taken.

Belief 1:

Companies with a responsible ESG policy are expected to outperform companies without an ESG policy, over the longer term.

The Committee believes that companies that have well developed ESG policies will generally provide better long term performance than those companies that have not considered ESG factors in their business.

Belief 2:

The Committee considers that company engagement, rather than disinvestment, would be the better approach to fulfilling their responsible investment objectives. However, should a company not respond to engagement, disinvestment would be a consideration. Disinvestment on a whole sector basis is not within the Committee's beliefs.

Disinvestment is a blunt tool that is not believed to provide the best outcomes over the medium to long term. The Fund will, through its managers and other organisations, engage with companies to bring change, but will consider company disinvestment if engagement fails.

Belief 3:

Climate change and the expected transition to a low carbon economy is a long term financial risk to Fund outcomes.

The Committee believes that climate change risk and the transition to a low carbon economy should be factored into asset allocation decisions and also investment decisions by managers to reduce the long term financial risk, but also to take advantage of the opportunities that may be available.

Belief 4:

The Committee should focus on meeting its financial obligations to pay benefits to members. Financial considerations should therefore carry more weight than non-financial considerations.

The main objective of the Pension Fund is to ensure that it is able to pay benefits to its members as and when they fall due. Therefore financial considerations will be at the forefront of any investment or asset allocation decisions.

Belief 5:

The Fund's active investment managers should embed the consideration of ESG factors into their investment process and decision making.

The Committee believes that the consideration of ESG factors when making investment decisions should not be an add-on but should be embedded into the whole investment selection process. Any active managers appointed by the Fund will be expected to evidence this.

Belief 6:

The Fund should collaborate with other investors if it could have a positive impact, and also engage with them and investment managers to better understand ESG risks.

The Committee believes that the Fund has a stronger voice when working with others, be it Border to Coast Pensions Partnership, Local Authority Pension Fund Forum (LAPFF) or any other organisations. The Fund will work with them and the investment managers to ensure that it understands the ESG risks and how best to address them.

It is considered that the Pensions Committee represents the views of the Fund membership and, in addition, the views of the Local Pension Board are taken into account as part of their review of this document.

The exercise of rights attaching to investments (including voting rights)

The Fund has published its Responsible Investment Policy and Voting Guidelines on the shared website at www.wypf.org.uk.

Lincolnshire Pension Fund is fully committed to responsible investment (RI) to improve the long term value for shareholders. The Fund believes that well governed companies produce better and more sustainable returns than poorly governed companies. The Fund also believe that asset owners, either directly (where resources allow) or through their external managers and membership of collaborative shareholder engagement groups (such as LAPFF), could influence the Board/Directors of underperforming companies to improve the management and financial performance of those companies.

As global investors, the Fund expects the principles of good stewardship to apply globally, whilst recognising the need for local market considerations in its application. Reflecting on this the Fund has summarised its compliance with the UK Stewardship code (2012) and principles relating to good stewardship below. The code has been revised with effect from January 2020, and the Fund will report against this in March 2021.

Principle 1 – Institutional investors should publicly disclose their policy on how they will discharge their stewardship responsibilities.

The Lincolnshire Pension Fund takes its responsibilities as a shareholder seriously, and has a Responsible Investment Policy that is aligned with our asset pool, Border to Coast. This can be found on the Pension Fund's shared website at http://www.wypf.org.uk/Member/Publications/PolicyStatements/Lincolnshire/PolicyStatements_Lincoln_Index.aspx. It seeks to adhere to the Stewardship Code where possible, and expects its appointed asset managers to do so too. Resources do not currently allow for a dedicated role to oversee LPF's RI responsibilities at a Fund level, however the asset pooling arrangements currently being implemented will enable a more active role in the future.

In practice the Fund applies the Code in two ways; through arrangements with its asset managers and through membership of the Local Authority Pension Fund Forum, a collaborative shareholder engagement group for Local Authority Pension Funds. Through these channels, LPF seeks to improve long term share performance through investment in better governed companies, therefore improving the funding level of the LPF and reducing the cost to stakeholders in the Local Government Pension Scheme.

As part of the manager appointment process, the Fund selects managers who show how their stewardship responsibilities are built in as an integral part of their investment process. Managers are asked to include information on stewardship and engagement activity in their quarterly reports to LPF, so that activity can be monitored. The Fund has regular meetings with its external managers where their stewardship activities are on the agenda. This assists the Fund in understanding the impact of any such activities undertaken and ensures that they are aligned with the engagement work done by LAPFF.

The Fund reports quarterly to the Pensions Committee on the engagement work undertaken by LAPFF and an officer regularly attends the LAPFF meetings. The Fund also attends the LAPFF Annual Conference to ensure a full understanding and input into the work programme of LAPFF.

Voting is carried out at by the external fund managers, who are expected to vote in line with best practice. Managers report detail of voting undertaken quarterly to officers, and the Fund reports quarterly to the Pensions Committee in summary on all voting activity undertaken.

Principle 2 - Institutional investors should have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed.

The Fund expects the asset managers it employs to have effective policies addressing potential conflicts of interest, and that these are all publically available on their respective websites. These are discussed prior to the appointment of a manager, and reviewed as part of the standard manager monitoring process.

In respect of conflicts of interest within the Fund, Pensions Committee and the Pension Board review the Pension Fund Code of Conduct and Conflicts of Interest Policy annually and all members are required to sign an annual declaration form in line with the published policy. The policy can be found on the shared LPF website at www.wypf.org.uk. In addition, Committee members are required to make declarations of interest prior to committee meetings which are documented in the minutes of each meeting and available on the Council's website at www.lincolnshire.gov.uk.

Principle 3 - Institutional investors should monitor their investee companies.

As investors we own a portion of the companies we invest in. With working through our external managers and LAPFF we can use our rights as owners to encourage companies to act more responsibly and improve their practices. All our managers are required to consider how environmental, social and governance factors might impact companies sustainability, and therefore their long term share performance.

Day-to-day responsibility for managing our externally managed equity holdings is delegated to our appointed asset managers, and the Fund expects them to monitor their investee companies and engage where necessary. Managers are asked to include information on stewardship and engagement activity in their quarterly reports to LPF, so that activity and impact can be monitored. The Fund has regular meetings with its external managers where their stewardship activities are on the agenda. This assists the Fund in understanding the impact and effectiveness of any such activities undertaken and ensures that they are aligned with the engagement work done by LAPFF. Reports on the Funds voting and engagement activity through LAPFF are received by the Pensions Committee on a quarterly basis.

Resources do not currently allow for a dedicated role to monitor investee companies at a Fund level, however the asset pooling arrangements currently being implemented will enable a more active role in the future.

Principle 4 - Institutional investors should establish clear guidelines on when and how they will escalate their activities.

As highlighted above, responsibility for day-to-day interaction with companies is delegated to the Fund's asset managers, including the escalation of engagement when necessary. Their guidelines for such activities are expected to be disclosed in their own statement of adherence to the Stewardship Code. We review each manager's policy on engagement and escalation prior to appointment and we review their engagement activity during regular review meetings with them, and support it when required. Escalation routes across our managers involve meetings with company management, meetings with Non-Executive Directors, collaborating with other institutional shareholders, submitting resolutions at general meetings and in the

most extreme instances divestment of shares. The outcome of any engagement is reported to the Fund through the normal reporting routine.

On occasion, the Fund may itself choose to escalate activity through its participation in the Local Authority Pension Fund Forum. The areas where escalation might occur would be aligned with the LAPFF work programme. Fund involvement would be by either co-signing a shareholder resolution or publically supporting a shareholder resolution. This would happen following a request from LAPFF explaining the engagement activity taken so far and the reasons why a shareholder resolution is required. The Fund had an agreed process for this internally which requires a paper taken to our Pensions Committee (time allowing) or through delegation to the Council's Executive Director of Finance and Public Protection in consultation with the Chair and Vice Chair of the Pensions Committee to agree. Examples of escalation activity from LAPFF that the Fund has supported are shown below:

- Supporting the Human Rights Capital shareholder resolution at Sports Direct
- Part of the 'Aiming for A' investor coalition – successfully co-filing at BP, Shell, Anglo American, Rio Tinto and Glencore on strategic resilience resolutions
- Supported shareholder resolutions at National Express on workplace rights

The Fund monitors and participates in shareholder litigation through its contracts with IPS (Institutional Protection Services) and US law firm Labaton Sucharow. In addition, supplementary monitoring is provided by BLBG.

Principle 5 - Institutional investors should be willing to act collectively with other investors where appropriate.

The Fund seeks to work collaboratively with other institutional shareholders in order to maximise the influence that it can have on individual companies. The Fund achieves this through membership of the Local Authority Pension Fund Forum, which engages with companies over environmental, social and governance issues on behalf of its members.

The LAPFF agree planned work programmes each year which are discussed and approved at LAPFF meetings. This plan sets out the engagement areas for activity for the coming year. Lincolnshire Pensions Team Accounting, Investment and Governance Manager Claire Machej is the named representative responsible for attending these meetings and actively participates in any discussions and setting of the work programme. She raises any concerns that the Fund may have and feeds back to the Pensions Committee on a quarterly basis.

The asset pooling arrangements with Border to Coast currently being implemented will enable additional collaborative working.

The contact for any potential collective action with the Fund is the Head of Pensions, Jo Ray, at jo.ray@lincolnshire.gov.uk.

Principle 6 - Institutional investors should have a clear policy on voting and disclosure of voting activity.

Responsibility for the exercise of voting rights is delegated to the Fund's appointed

asset managers. The Fund has a Corporate Governance Voting Guidelines and Voting Guidelines policy that can be found on the Pension Fund's shared website at http://www.wypf.org.uk/Member/Publications/PolicyStatements/Lincolnshire/PolicyStatements_Lincoln_Index.aspx. This is aligned to the Border to Coast policy.

The quarterly reports presented to the Pensions Committee include high level voting activity and are available on the Council's website, alongside all committee reports.

The Fund participates in stock lending through its Custodian. Stock is not recalled ahead of company meetings to allow voting on the holdings participating in the stock lending programme, due to the restricted resources within the internal team.

Principle 7 - Institutional investors should report periodically on their stewardship and voting activities.

The Fund reports quarterly to the Pensions Committee on stewardship activity through a specific section on voting undertaken each quarter, in the Fund Update. This includes details of engagement activity undertaken through the Local Authority Pension Fund Forum. On an annual basis the Fund includes a section on Stewardship Responsibilities in its Annual Report and Accounts, detailing voting activity and highlighting the key engagements over the year through its membership of LAPFF. These are available on the Council's website.

Data to produce these reports is taken from the Fund's external managers, and from reports produced by LAPFF.

Compliance and monitoring

The investment managers are required to adhere to the principles set out in this Investment Strategy Statement and officers ensure, through their regular monitoring, that the investment managers have adhered to the principles set out in this statement.

The Investment Strategy Statement of the Lincolnshire Pension Fund is reviewed by the Pensions Committee annually and more regularly if considered appropriate or amendments are required.

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Communication Policy Statement

COMMUNICATION POLICY STATEMENT

Lincolnshire County Council, as administering authority for the Local Government Pension Scheme, is required by statute to publish a communications policy statement. The Fund communicates with over 240 employers and over 75,000 scheme members, in addition to a large number of other interested parties.

The Regulations governing the Local Government Pension Scheme are laid before parliament by the Ministry of Housing, Communities and Local Government. One of the key requirements they make on all Administering Authorities is to prepare, maintain and publish a written statement setting out the information below:-

- a) The Fund must now prepare, maintain and publish a written statement setting out its policy concerning communications with
 - members;
 - representatives of members;
 - prospective members; and
 - employing authorities.

- b) In particular, the statement must set out the Fund's policy on
 - i. the provision of information and publicity about the Scheme to members, representatives of members and employing authorities (including non-Scheme Employers);
 - ii. the format, frequency and method of distributing such information or publicity; and
 - iii. the promotion of the Scheme to prospective members and their employing authorities.

The day-to-day administration of the Local Government Pension Scheme is carried out on behalf of the County Council by West Yorkshire Pension Fund (WYPF), in a shared service arrangement. Communication material is produced by WYPF in collaboration with the Pensions Team in Lincolnshire. All arrangements for forums, workshops and meetings covered within this statement are made in partnership with WYPF.

The Fund communicates with all stakeholders, as defined in specific legislation, and listed above.

Communication is increasingly distributed via electronic means, with all documents available on a dedicated Pensions website (www.wypf.org.uk).

WYPF provide a dedicated enquiry phone numbers and emails for both scheme members and employers for pension related enquiries. For scheme members it is 01274 434999 and pensions@wypf.org.uk, and for employers it is 01274 434900 and wypf.pfr@wypf.org.uk.

The appropriately qualified staff from the County Council, WYPF or external advisers will deliver presentations to groups of stakeholders and conduct individual meetings.

The Fund's objective in respect of communication is to comply with relevant legislation and ensure relevant individuals and employers receive accurate and timely information about their pension arrangements. Methods of communication are set out in the table below.

Communications events - Scheme Members

Communication	Format	Frequency	Method of Distribution
LGPS active members (including representatives of retired members)	Newsletter	2 per year	Mail
	www.wypf.org.uk	Constant	Web
	Contact centre - Bradford	8.45 to 4.30 Monday to Friday	Telephone E-mail Face to face
	County Offices, Lincoln	8.00 to 5.00 Monday to Friday	Face to face
	Social media	Constant	Web
	Annual benefit statement	1 per year	Mail
	Roadshows	Quarterly	Face to face
	Mid-Life course	Currently on trial	Face to face
	Pre-retirement course	Monthly	Face to face
LGPS deferred members (including representatives of deferred members)	www.wypf.org.uk	Constant	Web
	Contact Centre - Bradford	8.45 to 4.30 Monday to Friday	Telephone E-mail Face to face
	County Offices, Lincoln	8.00 to 5.00 Monday to Friday	Face to face
	Social media	Constant	Web
	Newsletter	1 per year	Mail
LGPS pensioner members (including representatives of retired members)	www.wypf.org.uk	Constant	Web
	Contact centre - Bradford	8.45 to 4.30 Monday to Friday	Face to face Telephone E-mail
	County Offices, Lincoln	8.00 to 5.00 Monday to Friday	Face to face

Pension advice slips	As and when net pension varies by 25p or more	Mail
P60	1 per year	Mail
Social media	Constant	Web
Newsletter	1 per year	Mail

Communications events - Employers

Communication	Format	Frequency	Method of Distribution
Employers	Pension Fund Representatives	8.30 to 4.30 Monday to Friday	Face to face Telephone E-mail
	Website	Constant	Web
	Fact card	1 per year	Mail
	Fact sheets	Constant	Web
	Employer guide	Constant	Web/electronic document
	Ad hoc training	As and when required	Face to face
	Update sessions	2 per year	Meeting
	Annual meeting	1 per year	Meeting
	Manuals/toolkits	Constant	Web/electronic document
	Social media	Constant	Web
	Workshops	5 per year	Face to face
	Introduction to Pensions	Bi-monthly	Face to face
	Training webinars	Constant	Web
	Online training video	Constant	Web

Governance Policy and Compliance Statement



Lincolnshire County Council, as administering authority (and Scheme Manager) for the Local Government Pension Scheme, is required by statute to publish a governance compliance statement. The Council has elected to do this by publishing a concise Governance Policy Statement and then to outline, as required by legislation, the extent to which that statement and the underlying practices demonstrate compliance with best practice guidance as published by the Department for Communities and Local Government. This latter aspect constitutes the Governance Compliance Statement.

The Governance Policy and Compliance Statements are set out in turn below.

GOVERNANCE POLICY STATEMENT

The County Council has delegated its pension fund administering authority functions to a Pensions Committee and the Executive Director – Resources. The Public Service Pensions Act (2013) required all administering authorities to introduce a local Pension Board to assist the Scheme Manager.

Pensions Committee

The Pensions Committee has 11 members in total, 8 of which are County Councillors and 3 co-opted members. All the members have full voting rights.

The 8 County Councillors represent the political balance of the Council.

The 3 co-opted members comprise:

- 1 representative from the other local authorities within the County,
- 1 representative for non Local Authority employers, and
- 1 Trade Union representative, reflecting the interests of scheme members.

Under the County Council's Constitution, the Pensions Committee exercises the following functions, to;

- Drawing upon appropriate professional advice, to set investment policies for the Fund, including the establishment and maintenance of a strategic benchmark for asset allocation, and approval of the Investment Strategy Statement.
- To review the performance of Border to Coast Pensions Partnership Limited and its sub-funds, legacy fund managers and associated professional service providers.



- To approve the annual Report and Statement of accounts of the fund.
- To consider any other matters relevant to the operation and management of the fund.
- As necessary and appropriate issue instructions to the Council's representative as shareholder of Border to Coast Pensions Partnership Limited on matters affecting the exercise of the Council's rights as shareholder in the company.
- To respond to any relevant consultations impacting upon the benefit provisions of the Local Government Pension Scheme.

In fulfilling its functions the Committee shall have regard to the advice of the Lincolnshire Local Pension Board established in accordance with the Local Government Pension Scheme (Amendment) (Governance) Regulations 2015 and shall receive and consider recommendations from the Border to Coast Pensions Partnership Joint Committee.

The Pensions Committee has four regular meetings, two manager monitoring meetings and two training meetings each year. In addition, one or more special meetings may be held to appoint new investment managers or other professional advisers.

The Pensions Committee's regular quarterly meetings are open to the public and agendas, reports and minutes are made available through the County Council's website. An annual report on the management of the fund is provided to all scheme employers with an abbreviated version distributed to scheme members.

Executive Director – Resources

The Executive Director – Resources is responsible for the day-to-day administration of the benefits and assets of the pension scheme, specifically to:

- authorise payment of statutory pensions and allowances,
- undertake or arrange for all necessary transactions associated with the management of the assets of the Pension Fund, and
- agree appropriate means of securing external representation on the Pensions Committee, in consultation with relevant external bodies.

Lincolnshire Pension Board

The Lincolnshire Pension Board will ensure the Scheme Manager effectively and efficiently complies with the Code of Practice on the governance and administration

of public service pension schemes issued by the Pensions Regulator. The Board will also ensure that it complies with the knowledge and understanding requirements in the Pensions Regulator's Code of Practice.

In addition to the local structure, the Lincolnshire Pension Board is accountable to the Pensions Regulator and the National Scheme Advisory Board.

The Pensions Regulator will also be a point of escalation for whistle blowing or similar issues (supplementary to the whistle blowing policy and anti-fraud and corruption policy operated by the administering authority, which operate to include all of the functions of the Council and its advisers).

The role of the Lincolnshire Pension Board is set out below:

- Assist Lincolnshire County Council as Scheme Manager;
- To secure compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that is connected with it;
- To secure compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator; and
- In such other matters as the scheme regulations may specify.

The terms of reference for the Board are available on the Funds shared website with WYPF at www.wypf.org.uk.

The Lincolnshire Pension Board consists of five members:

- two employer representatives (to represent all employers within the Scheme)
- two scheme members representatives (to represent all members of the Scheme (active, deferred and pensioner))
- an independent member (to act as Chairman)

The employer and scheme member representatives can vote. The Independent Chairman cannot vote.

The Lincolnshire Pension Board has a minimum of four meetings each year. In addition, Board members must attend regular training events.

The Lincolnshire Pension Board meetings are open to the public and agendas, reports and minutes are made available through the Funds shared website with WYPF at www.wypf.org.uk. An annual report on the work of the Board is included in the Fund's annual report, which is published on the Council's website and provided to all scheme employers with an abbreviated version distributed to scheme members.

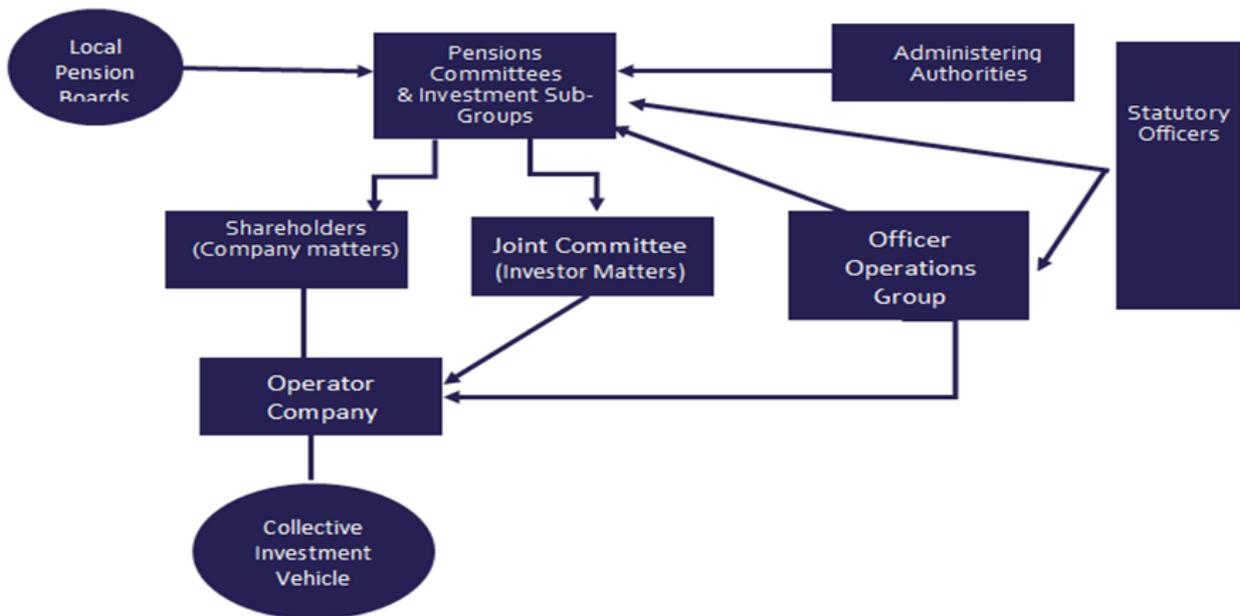
Any complaint or allegation of breach of due process brought to the attention of the Lincolnshire Pension Board shall be dealt with in accordance with the Code of Practice as published by the Pensions Regulator.

Any questions about the governance of the Lincolnshire Local Government Pension Fund should be addressed to Jo Ray, Head of Pensions (email: jo.ray@lincolnshire.gov.uk or telephone 01522 553656).

Asset Pooling Governance

In response to the change in regulations, LGPS Funds have to pool the investment of their assets. Lincolnshire Pension Fund is a Partner Fund in the Border to Coast Pensions Partnership Limited (Border to Coast), one of the eight asset pools created.

The diagram below shows the governance structure for Border to Coast.



The Fund holds Border to Coast to account through the following mechanisms:

- A representative on the Shareholder Board, with equal voting rights, who will provide oversight and control of the corporate operations of Border to Coast (LCC S151 Officer).
- A representative on the Joint Committee who will monitor and oversee the investment operations of Border to Coast (Pensions Committee Chairman).
- Officer support to the above representatives from the Officer Operations Group and the Statutory Officer Group (Head of Pensions).

The Pension Fund will retain the decision making powers regarding asset allocation and will delegate the investment management function to Border to Coast.

GOVERNANCE COMPLIANCE STATEMENT

Principle		Full Compliance	Comments
A - Structure	a. The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Yes	See terms of reference for the Pensions Committee in the Policy Statement above.
	b. That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Partial	The Council has not, to date, seen the need to establish a secondary committee/panel. It will, however, keep this aspect under review and does establish working groups from the Committee to deal with specific issues. Pensioner and deferred beneficiaries are not presently represented directly on the Committee – see B a. below.
	c. That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	Not Relevant	As discussed above, no such forum has been established as yet.
	d. That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.	Not Relevant	As discussed above, no such forum has been established as yet.
B - Representation	a. That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee	Partial	The Committee has 11 members, all with voting rights, of which 8 are County Council Councillors. Other members include one

	<p>structure. These include :-</p> <ul style="list-style-type: none"> • Employing authorities (including non-scheme employers, e.g. admitted bodies); • Scheme members (including deferred and pensioner scheme members), • Where appropriate, Independent professional observers, and • Expert advisors (on an ad hoc basis) 		<p>representing other local authorities (district councils) and one representing small scheduled bodies, currently from an Internal Drainage Board. Member related issues are dealt with by having a trade union representative on the Committee. Given the statutory guarantee that exists in respect of member benefits, this is felt to be sufficient representation. The Council will review this aspect periodically. The Committee have appointed an independent investment advisor who attends all Committees.</p>
	<p>b. That where lay members sit on the main or secondary committee, they are treated equally in terms of access to papers, meetings and training and are given full opportunity to contribute to the decision making process, with or without voting rights.</p>	Yes	<p>All members of the Committee have full voting rights and equal access to information, training, etc.</p>
<p>C – Selection and Role of Lay Members</p>	<p>a. That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.</p>	Yes	<p>Nationally customised training is available to all members and this is supplemented by locally provided induction sessions for new members of the Committee. In addition, the Committee agrees an annual training plan with specific topics covered on set dates.</p>
	<p>b. That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.</p>	Yes	<p>The declaration of member's interests is a standard item on the agenda of the Pensions Committee.</p>

D - Voting	a. That the policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Yes	Full voting rights are given to all members of the Committee.
E – Training/Facility Time/Expenses	a. That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.	Yes	See C a. above. All expenses incurred by members of the Pensions Committee are either met by the body they represent or directly by the Fund itself.
	b. That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.	Yes	All members are treated equally in every respect.
	c. That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.	Yes	The Committee agrees an annual training plan with specific topics covered on set dates. All training undertaken by members of the Pensions Committee is recorded and additional training opportunities are regularly brought to the attention of the Committee, either in monthly update letters or in reports taken to Committee.
F – Meetings - Frequency	a. That an administering authority’s main committee meet at least quarterly.	Yes	See Compliance Policy Statement above.

	b. That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.	Not Relevant	As discussed above, no such forum has been established as yet.
	c. That an administering authority who does not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	Not Relevant	Three added members exist and have equal rights with all mainstream members in all respects.
G – Access	a. That, subject to any rules in the council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee.	Yes	All members are treated equally in every respect.
H – Scope	a. That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Partial	The terms of reference of the Pensions Committee were changed a number of years ago to include benefit related matters which up until that time had been dealt with elsewhere within the governance arrangements of the Council. A report on the administration of the scheme is taken to each quarterly committee meeting. At present the Council does not believe there is a strong argument in favour of appointing an independent professional observer on administration/governance issues in addition to the independent advisor already in place

			in respect of investment matters.
I - Publicity	a. That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.	Yes	The County Council publishes the many governance documents and communicates regularly with employers and scheme members.

Reporting Breaches Procedure

1. Introduction

- 1.1 This document sets out the procedures to be followed by certain persons involved with the Lincolnshire Pension Fund, the Local Government Pension Scheme managed and administered by Lincolnshire County Council, in relation to reporting breaches of the law to the Pensions Regulator.
- 1.2 Breaches can occur in relation to a wide variety of the tasks normally associated with the administrative function of a scheme such as keeping records, internal controls, calculating benefits and making investment or investment-related decisions.
- 1.3 This Procedure document applies, in the main, to:
- all members of the Lincolnshire Pension Board and Pensions Committee;
 - all officers involved in the management of the Pension Fund ;
 - personnel of the shared service pensions administrator providing day to day administration services to the Fund, and any professional advisers including auditors, actuaries, legal advisers and fund managers; and
 - officers of employers participating in the Lincolnshire Pension Fund who are responsible for pension matters.

2. Requirements

2.1 This section clarifies the full extent of the legal requirements and to whom they apply.

2.2 Pensions Act 2004

Section 70 of the Pensions Act 2004 (the Act) imposes a requirement on the following persons:

- a trustee or manager of an occupational or personal pension scheme;
- a member of the pension board of a public service pension scheme;
- a person who is otherwise involved in the administration of such a scheme an occupational or personal pension scheme;
- the employer in relation to an occupational pension scheme;
- a professional adviser in relation to such a scheme; and
- a person who is otherwise involved in advising the trustees or managers of an occupational or personal pension scheme in relation to the scheme, to report a matter to The Pensions Regulator as soon as is reasonably practicable where that person has reasonable cause to believe that:
 - (a) a legal duty relating to the administration of the scheme has not been or is not being complied with, and
 - (b) the failure to comply is likely to be of material significance to The Pensions Regulator.

The Act states that a person can be subject to a civil penalty if he or she fails to comply with this requirement without a reasonable excuse. The duty to report breaches under the Act overrides any other duties the individuals listed above may have. However the duty to report does not override 'legal privilege'. This means that, generally, communications between a professional legal adviser and their client, or a person representing their client, in connection with legal advice being given to the client, do not have to be disclosed.

2.3 The Pension Regulator's Code of Practice

Practical guidance in relation to this legal requirement is included in The Pension Regulator's Code of Practice including in the following areas:

- implementing adequate procedures.
- judging whether a breach must be reported.
- submitting a report to The Pensions Regulator.
- whistleblowing protection and confidentiality.

2.4 Application to the Lincolnshire Pension Fund

This procedure has been developed to reflect the guidance contained in The Pension Regulator's Code of Practice in relation to the Lincolnshire Pension Fund and this document sets out how the Board and Committee will strive to achieve best practice through use of a formal reporting breaches procedure.

3 The Lincolnshire Pension Fund Reporting Breaches Procedure

The following procedure details how individuals responsible for reporting and whistleblowing can identify, assess and report (or record if not reported) a breach of law relating to the Lincolnshire Pension Fund. It aims to ensure individuals responsible are able to meet their legal obligations, avoid placing any reliance on others to report. The procedure will also assist in providing an early warning of possible malpractice and reduce risk.

3.1 Clarification of the law

Individuals may need to refer to regulations and guidance when considering whether or not to report a possible breach. Some of the key provisions are shown below:

- Section 70(1) and 70(2) of the Pensions Act 2004:
www.legislation.gov.uk/ukpga/2004/35/contents
- Employment Rights Act 1996:
www.legislation.gov.uk/ukpga/1996/18/contents
- Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 (Disclosure Regulations):
www.legislation.gov.uk/uksi/2013/2734/contents/made
- Public Service Pension Schemes Act 2013:
www.legislation.gov.uk/ukpga/2013/25/contents
- Local Government Pension Scheme Regulations (various):
<http://www.lgpsregs.org/timelineregs/Default.html> (pre 2014 schemes)
<http://www.lgpsregs.org/index.php/regs-legislation> (2014 scheme)

- The Pensions Regulator’s Code of Practice:
<http://www.thepensionsregulator.gov.uk/codes/code-governance-administration-publicservice-pension-schemes.aspx>
 In particular, individuals should refer to the section on ‘Reporting breaches of the law’, and for information about reporting late payments of employee or employer contributions, the section of the code on ‘Maintaining contributions’.

Further guidance and assistance can be provided by the Executive Director – Resources and the Head of Pensions, provided that requesting this assistance will not result in alerting those responsible for any serious offence (where the breach is in relation to such an offence).

3.2 Clarification when a breach is suspected

Individuals need to have reasonable cause to believe that a breach has occurred, not just a suspicion. Where a breach is suspected the individual should carry out further checks to confirm the breach has occurred. Where the individual does not know the facts or events, it will usually be appropriate to check with the Executive Director – Resources, the Head of Pensions, a member of the Pensions Committee or Pension Board or others who are able to explain what has happened. However there are some instances where it would not be appropriate to make further checks, for example, if the individual has become aware of theft, suspected fraud or another serious offence and they are also aware that by making further checks there is a risk of either alerting those involved or hampering the actions of the police or a regulatory authority. In these cases The Pensions Regulator should be contacted without delay.

3.3 Determining whether the breach is likely to be of material significance

To decide whether a breach is likely to be of material significance an individual should consider the following, both separately and collectively:

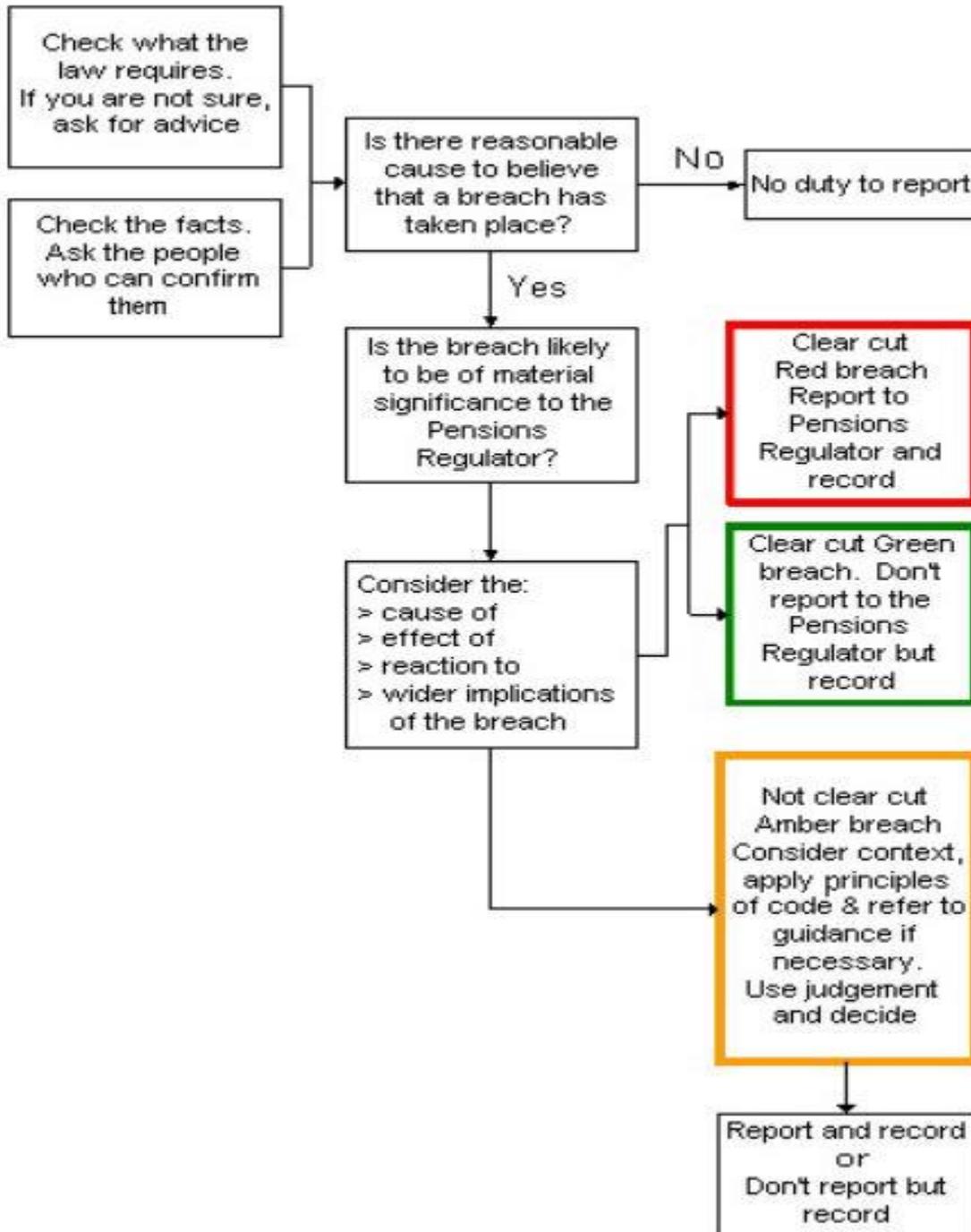
- cause of the breach (what made it happen);
- effect of the breach (the consequence(s) of the breach);
- reaction to the breach; and
- wider implications of the breach.

Further details on the above four considerations are provided in Appendix A to this procedure.

The individual should use the traffic light framework described in Appendix B to help assess the material significance of each breach and to formally support and document their decision.

- 3.4** A decision tree is provided below to show the process for deciding whether or not a breach has taken place and whether it is materially significant and therefore requires to be reported.

Decision-tree: deciding whether to report



3.5 Referral to a level of seniority for a decision to be made on whether to report

Lincolnshire County Council has a designated Monitoring Officer to ensure the County Council acts and operates within the law. They are considered to have appropriate experience to help investigate whether there is reasonable cause to believe a breach has occurred, to check the law and facts of the case, to maintain records of all breaches and to assist in any reporting to The Pensions Regulator, where appropriate. If breaches relate to late or incorrect

payment of contributions or pension benefits, the matter should be highlighted to the Executive Director – Resources or the Head of Pensions at the earliest opportunity to ensure the matter is resolved as a matter of urgency. Individuals must bear in mind, however, that the involvement of the Monitoring Officer is to help clarify the potential reporter's thought process and to ensure this procedure is followed. The reporter remains responsible for the final decision as to whether a matter should be reported to The Pensions Regulator.

The matter should not be referred to any of these officers if doing so will alert any person responsible for a possible serious offence to the investigation (as highlighted in section 2). If that is the case, the individual should report the matter to The Pensions Regulator setting out the reasons for reporting, including any uncertainty – a telephone call to the Regulator before the submission may be appropriate, particularly in more serious breaches.

3.6 Dealing with complex cases

The Executive Director – Resources or the Head of Pensions may be able to provide guidance on particularly complex cases. Information may also be available from national resources such as the Scheme Advisory Board or the LGPC Secretariat (part of the LG Group - <http://www.lgpsregs.org/>). If timescales allow, legal advice or other professional advice can be sought and the case can be discussed at the next Board meeting.

3.7. Timescales for reporting

The Pensions Act and Pension Regulators Code require that if an individual decides to report a breach, the report must be made in writing as soon as reasonably practicable. Individuals should not rely on waiting for others to report and nor is it necessary for a reporter to gather all the evidence which The Pensions Regulator may require before taking action. A delay in reporting may exacerbate or increase the risk of the breach. The time taken to reach the judgements on “reasonable cause to believe” and on “material significance” should be consistent with the speed implied by ‘as soon as reasonably practicable’. In particular, the time taken should reflect the seriousness of the suspected breach.

3.8 Early identification of very serious breaches

In cases of immediate risk to the scheme, for instance, where there is any indication of dishonesty, The Pensions Regulator does not expect reporters to seek an explanation or to assess the effectiveness of proposed remedies. They should only make such immediate checks as are necessary. The more serious the potential breach and its consequences, the more urgently reporters should make these necessary checks. In cases of potential dishonesty the reporter should avoid, where possible, checks which might alert those implicated. In serious cases, reporters should use the quickest means possible to alert The Pensions Regulator to the breach.

3.9 Recording all breaches even if they are not reported

The record of past breaches may be relevant in deciding whether to report a breach (for example it may reveal a systemic issue). Lincolnshire County

Council will maintain a record of all breaches identified by individuals and reporters should therefore provide copies of reports to the Executive Director – Resources or the Head of Pensions. Records of unreported breaches should also be provided as soon as reasonably practicable and certainly no later than within 20 working days of the decision made not to report. These will be recorded alongside all reported breaches. The record of all breaches (reported or otherwise) will be included in the quarterly Monitoring Report at each Pension Committee, and this will also be shared with the Pension Board.

3.10 Reporting a breach

Reports must be submitted in writing via The Pensions Regulator’s online system at www.tpr.gov.uk/exchange, or by post, email or fax, and should be marked urgent if appropriate. If necessary, a written report can be preceded by a telephone call. Reporters should ensure they receive an acknowledgement for any report they send to The Pensions Regulator. The Pensions Regulator will acknowledge receipt of all reports within five working days and may contact reporters to request further information. Reporters will not usually be informed of any actions taken by The Pensions Regulator due to restrictions on the disclosure of information.

As a minimum, individuals reporting should provide:

- full scheme name (Lincolnshire Pension Fund);
- description of breach(es);
- any relevant dates;
- name, position and contact details;
- role in connection to the scheme; and
- employer name or name of scheme manager (the latter is Lincolnshire County Council).

If possible, reporters should also indicate:

- the reason why the breach is thought to be of material significance to The Pensions Regulator;
- scheme address (provided at the end of this procedures document);
- scheme manager contact details (provided at the end of this procedures document);
- pension scheme registry number (PSR – 10051252); and
- whether the breach has been reported before.

The reporter should provide further information or reports of further breaches if this may help The Pensions Regulator in the exercise of its functions. The Pensions Regulator may make contact to request further information.

3.11 Confidentiality

If requested, The Pensions Regulator will do its best to protect a reporter’s identity and will not disclose information except where it is lawfully required to do so. If an individual’s employer decides not to report and the individual

employed by them disagrees with this and decides to report a breach themselves, they may have protection under the Employment Rights Act 1996 if they make an individual report in good faith.

3.12 Reporting to Pensions Committee and Pension Board

Where any breaches have been reported, a report will be presented to the Pensions Committee and the Pension Board on a quarterly basis setting out:

- all breaches, including those reported to The Pensions Regulator and those unreported, with the associated dates;
- in relation to each breach, details of what action was taken and the result of any action (where not confidential);
- any future actions for the prevention of the breach in question being repeated; and
- highlighting new breaches which have arisen in the last year/since the previous meeting.

This information will also be provided upon request by any other individual or organisation (excluding sensitive/confidential cases or ongoing cases where discussion may influence the proceedings). An example of the information to be included in the quarterly reports is provided in Appendix C to this procedure.

3.13 Review

This Reporting Breaches Procedure was originally developed in June 2015. It will be kept under review and updated as considered appropriate by the Executive Director – Resources or the Head of Pensions. It may be changed as a result of legal or regulatory changes, evolving best practice and ongoing review of the effectiveness of the procedure.

Further Information

If you require further information about reporting breaches or this procedure, please contact the designated officer contacts detailed below:

Jo Ray – Head of Pensions

Email: jo.ray@lincolnshire.gov.uk

Telephone: 01522 553656

Lincolnshire Pension Fund, Lincolnshire County Council, Newland, Lincoln, LN1 1YL

Executive Director – Resources – Andrew Crookham

Email: andrew.crookham@lincolnshire.gov.uk

Telephone: 01522 553602

Monitoring Officer – David Coleman

Email: david.coleman@lincolnshire.gov.uk

Telephone: 01522 552134

Appendix A

Determining whether a breach is likely to be of material significance

To decide whether a breach is likely to be of material significance individuals should consider the following elements, both separately and collectively:

- cause of the breach (what made it happen);
- effect of the breach (the consequence(s) of the breach);
- reaction to the breach; and
- wider implications of the breach.

The cause of the breach

Examples of causes which are likely to be of concern to The Pensions Regulator are provided below:

- acting, or failing to act, in deliberate contravention of the law;
- dishonesty;
- incomplete or inaccurate advice;
- poor administration, i.e. failure to implement adequate administration procedures;
- poor governance; or
- slow or inappropriate decision-making practices.

When deciding whether a cause is likely to be of material significance individuals should also consider:

- whether the breach has been caused by an isolated incident such as a power outage, fire, flood or a genuine one-off mistake.
- whether there have been any other breaches (reported to The Pensions Regulator or not) which when taken together may become materially significant.

The effect of the breach

Examples of the possible effects (with possible causes) of breaches which are considered likely to be of material significance to The Pensions Regulator in the context of the LGPS are given below:

- Committee/Board members not having enough knowledge and understanding, resulting in pension boards not fulfilling their roles, the scheme not being properly governed and administered and/or scheme managers breaching other legal requirements.
- Conflicts of interest of Committee or Board members, resulting in them being prejudiced in the way in which they carry out their role and/or the ineffective governance and administration of the scheme and/or scheme managers breaching legal requirements.
- Poor internal controls, leading to schemes not being run in accordance with their scheme regulations and other legal requirements, risks not being

properly identified and managed and/or the right money not being paid to or by the scheme at the right time.

- Inaccurate or incomplete information about benefits and scheme information provided to members, resulting in members not being able to effectively plan or make decisions about their retirement.
- Poor member records held, resulting in member benefits being calculated incorrectly and/or not being paid to the right person at the right time.
- Misappropriation of assets, resulting in scheme assets not being safeguarded.
- Other breaches which result in the scheme being poorly governed, managed or administered.

The reaction to the breach

A breach is likely to be of concern and material significance to The Pensions Regulator where a breach has been identified and those involved:

- do not take prompt and effective action to remedy the breach and identify and tackle its cause in order to minimise risk of recurrence;
- are not pursuing corrective action to a proper conclusion; or
- fail to notify affected scheme members where it would have been appropriate to do so.

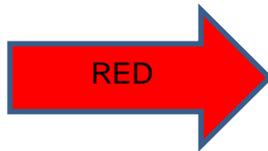
The wider implications of the breach

Reporters should also consider the wider implications when deciding whether a breach must be reported. The breach is likely to be of material significance to The Pensions Regulator where the fact that a breach has occurred makes it more likely that further breaches will occur within the Fund or, if due to maladministration by a third party, further breaches will occur in other pension schemes.

Appendix B

Traffic light framework for deciding whether or not to report

It is recommended that those responsible for reporting use the traffic light framework when deciding whether to report to The Pensions Regulator. This is illustrated below:



Where the cause, effect, reaction and wider implications of a breach, when considered together, are likely to be of material significance.

These must be reported to The Pensions Regulator.

Example: Several members' benefits have been calculated incorrectly. The errors have not been recognised and no action has been taken to identify and tackle the cause or to correct the errors.



Where the cause, effect, reaction and wider implications of a breach, when considered together, may be of material significance. They might consist of several failures of administration that, although not significant in themselves, have a cumulative significance because steps have not been taken to put things right. You will need to exercise your own judgement to determine whether the breach is likely to be of material significance and should be reported.

Example: Several members' benefits have been calculated incorrectly. The errors have been corrected, with no financial detriment to the members. However the breach was caused by a system error which may have wider implications for other public service schemes using the same system.



Where the cause, effect, reaction and wider implications of a breach, when considered together, are not likely to be of material significance. These should be recorded but do not need to be reported.

Example: A member's benefits have been calculated incorrectly. This was an isolated incident, which has been promptly identified and corrected, with no financial detriment to the member. Procedures have been put in place to mitigate against this happening again.

All breaches should be recorded even if the decision is not to report.

When using the traffic light framework individuals should consider the content of the red, amber and green sections for each of the cause, effect, reaction and wider implications of the breach, before you consider the four together. Some useful examples of this is framework is provided by The Pensions Regulator at the following link:

[http:// www.thepensionsregulator.gov.uk/codes/code-related-report-breaches.aspx](http://www.thepensionsregulator.gov.uk/codes/code-related-report-breaches.aspx)

Code of Conduct and Conflict of Interest Policy

1. Code of conduct

1.1 As members of a publicly funded body with a responsibility to discharge public business, members the Lincolnshire Pension Board and Pensions Committee should have the highest standards of conduct.

1.2 Members should have regard to the Seven Principles of Public life:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

1.3 All Lincolnshire Pension Board and Pensions Committee members must undertake to act in accordance with the following:

- You must act solely in the public interest and should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for yourself, your family, a friend or close associate.
- You must not place yourself under a financial or other obligation to outside individuals or organisations that might seek to influence you in the performance of your official duties.
- You must make all choices on merit and must be impartial and seen to be impartial, when carrying out your public duties.
- You must co-operate fully with whatever scrutiny is appropriate to your role.
- You will on occasions be privy to confidential and sensitive information, such as personal information about someone, or commercially sensitive information which, if disclosed, might harm the commercial interests of the Council or another person or organisation. This information must not be revealed without proper authority.
- You must, when using or authorising the use by others of the resources of your authority, ensure that such resources are not used improperly for political purposes (including party political purposes) and you must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.

- You must promote and support high standards of conduct when serving in your public post, in particular as characterised by the above requirements, by leadership and example.
- You will sign adherence to the Conflict of Interest Declaration and declare any further potential conflicts of interest that may arise once appointed as a member.
- You should comply with the Lincolnshire Pension Fund Code in addition to existing compliance with the Member or Officer Code of Conduct.

2. Conflict of interest

- 2.1 The Public Service Pensions Act 2013, Section 5(4) requires that any member of a Pension Board must not have a “conflict of interest”, which is defined in Section 5(5) as a “financial or other interest which is likely to prejudice the person’s exercise of functions as a member of the board, but does not include a financial or other interest arising merely by virtue of membership of the scheme or any connected scheme.”
- 2.2 A conflict of interest exists where there is a divergence between the individual interests of a person and their responsibility towards the Lincolnshire Pension Fund, such that it might be reasonably questioned whether the actions or decisions of that person are influenced by their own interests. A conflict of interest would prejudice an individual’s ability to perform their duties and responsibilities towards the Pension Fund in an objective way. Examples of potential conflicts of interest for all those involved in managing the Pension Fund are listed at appendix A.
- 2.4 All prospective Pension Board members are required to complete the Lincolnshire Pension Board Conflict of interest declaration before they are appointed to the Pension Board, attached at appendix B. All Pensions Committee members are also required to complete a declaration if they have not completed a Pecuniary Interests Disclosure.
- 2.5 All appointments to the Pension Board should be kept under review by the Executive Director – Resources.
- 2.5 It is the duty of any appointed Pension Board or Pensions Committee member to declare any potential conflict of interest. For the Pension Board, this declaration should be made to the Chair of the Lincolnshire Pension Board in the first instance or to the Scheme Manager, and recorded in a register of interests. For Pensions Committee members, this declaration should be

made in the normal way, as set down in the Council's Conflict of Interest Policy.

- 2.7 Any potential conflict of interests shall be identified and monitored in a register of interests (attached at appendix C). The register of interests should be circulated to the Lincolnshire Pension Board, Pensions Committee and Scheme Manager for review and publication.
- 2.8 If any member suspects any conflict of interest it should report its concerns to the Scheme Manager.
- 2.9 When seeking to prevent a potential conflict of interest becoming detrimental to the conduct and decisions of the Pension Board or Pensions Committee, members or officers of the Pension Fund should consider obtaining legal advice when assessing its course of action and response, and may wish to consult the Chief Legal Officer in the first instance.
- 2.10 Education on identifying and dealing with conflicts of interest will be included as part of the training requirement in the Knowledge and Understanding policy.

3. Alleged breaches of the Code of Conduct and conflict of interest policy

- 3.1 A process for dealing with the consideration of any alleged breaches, to include any sanctions to be applied, will be agreed by the Scheme Manager, the Lincolnshire Pension Board and the Pensions Committee.

Open Report on behalf of Andrew Crookham, Executive Director - Resources

Report to:	Lincolnshire Pension Board
Date:	19 March 2020
Subject:	Lincolnshire Pension Fund – Business Plan 2020/21

Summary:

This paper brings the Lincolnshire Pension Fund Business Plan 2020/21 to the Board for consideration.

Recommendation(s):

That the Board note the Lincolnshire Pension Fund Business Plan 2020/21.

Background

1. This paper brings the Lincolnshire Pension Fund Business Plan covering the financial year 2020/2021 period to the Pension Board for consideration. The Business Plan is attached at Appendix A and the areas it covers are set out below.
 - 1.1 Introduction – A brief background to the Pension Fund and its management.
 - 1.2 Objectives – the overarching objectives of the Fund across the headings of governance, investments and funding and administration and communication.
 - 1.3 Pension Fund Statistics – the funding position and cashflow of the Fund.
 - 1.4 Resources and Budget – the organisational structure of the Pensions team and the budget for managing the Fund, covering administration costs, investment management expenses and oversight and governance costs.
 - 1.5 Key Tasks 2020/21 – the key tasks for the Pensions Team in the coming year, linked to the Fund's objectives.
 - 1.6 Key Risks – the key risks that the Fund recognises across the themes of governance, investments and funding, and administration and communication, with the actions in place to mitigate or reduce the risks.

1.7 Forward Plan 2020/21- the Committee and Board meetings and expected papers.

Conclusion

2. The Pension Fund's Business Plan for the year 2020/21 has been produced and is presented to the Board for consideration.

Consultation

a) Have Risks and Impact Analysis been carried out??

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	Lincolnshire Pension Fund – Business Plan 2020/21

Background Papers

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk.

Lincolnshire Pension Fund Business Plan 2020/21



INTRODUCTION

Lincolnshire County Council is the Administering Authority of the Lincolnshire Local Government Pension Scheme (LGPS).

Management of the Pension Fund is delegated to the Pensions Committee acting in the role of 'trustees' of the Pension Fund. The day to day running of the Fund has been delegated to the Executive Director of Resources and the Head of Pensions.

The Pensions Team has responsibility for all aspects of the Fund including governance, investments and accounting, and the oversight of the administration service that is managed in a shared service with West Yorkshire Pension Fund (WYPF).

The Business Plan is an important document which sets out the aims and objectives of the fund over the coming year, its core work and how the objectives will be achieved.

A report on the management of key risks is also included as part of the Business Plan.

OBJECTIVES

The Fund's overarching objectives are:

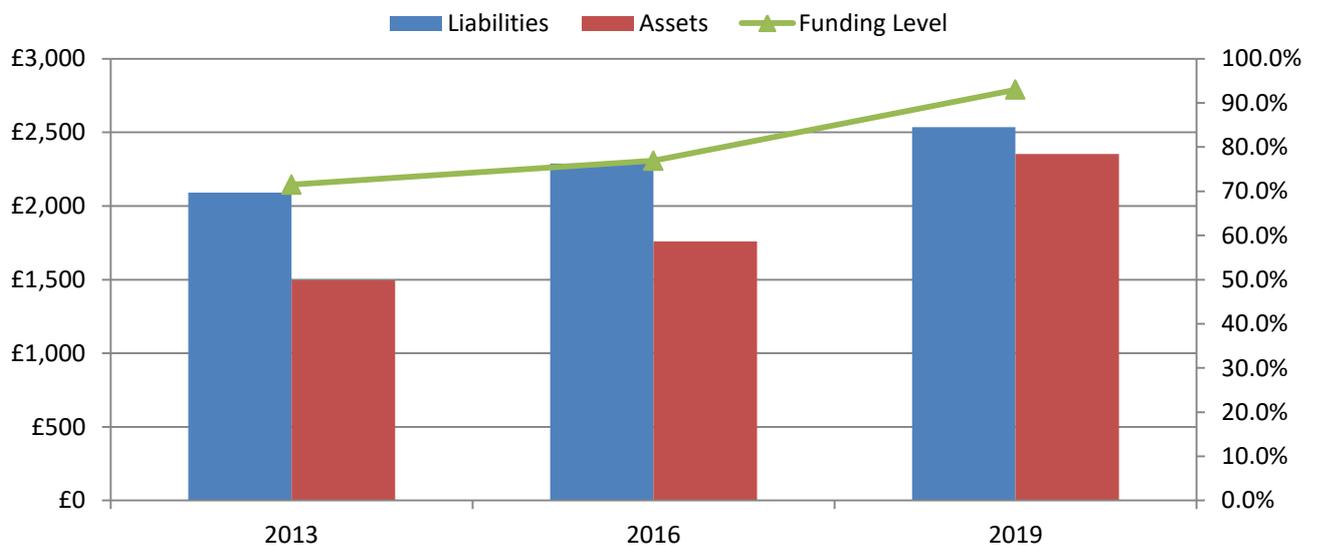
- **Governance:** To act with integrity and be accountable to stakeholders for decisions, ensuring that they are robust, well based and undertaken by people who have the appropriate knowledge and expertise;
- **Investments and Funding:** To maximise returns from investments within reasonable risk parameters and with clear investment decisions based on a prudent long term funding priorities, given the preference to keep employer contribution rates reasonably stable where appropriate; and
- **Administration and Communications:** In partnership with WYPF, to deliver an effective and efficient Pensions Administration service to all stakeholders, to ensure that the Fund receives all income due and payments are made to the right people at the right time, and to provide clear, appropriate and timely communication and support to all stakeholders;

PENSION FUND STATISTICS

The Lincolnshire Pension Fund was valued at £2,542.1 million as at the 31 December 2019.

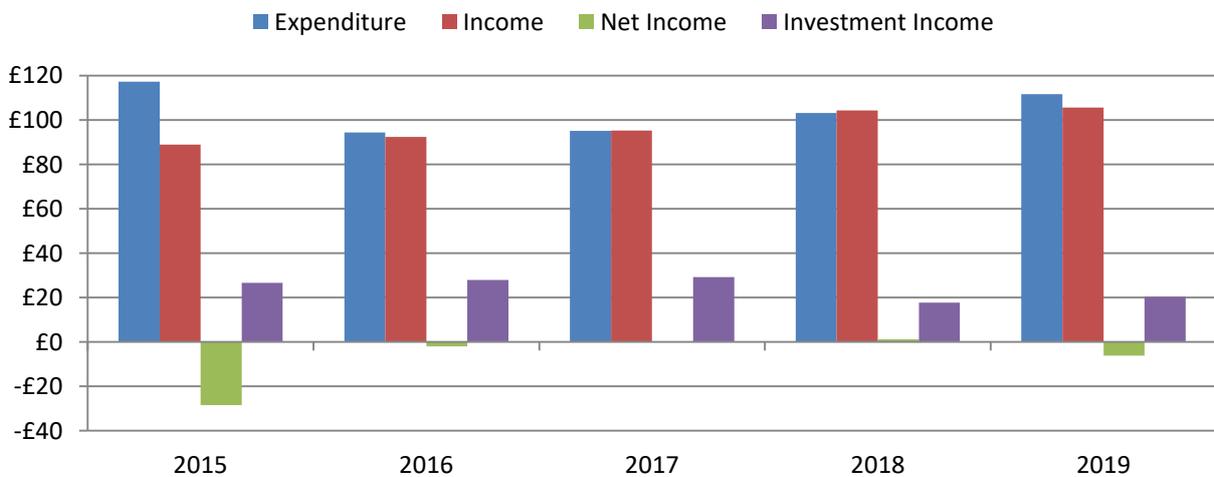
Actuarial valuations are carried out every three years, with the latest being as at 31 March 2019. The valuation provides a value for the liabilities and assets of the Fund and for each employer, to determine the overall funding level and to calculate individual employer contribution rates. The chart below shows the last three valuation cycles.

Progression of funding position:



Axis - Left hand side - £m / Right hand side - Funding Level

Cashflow:

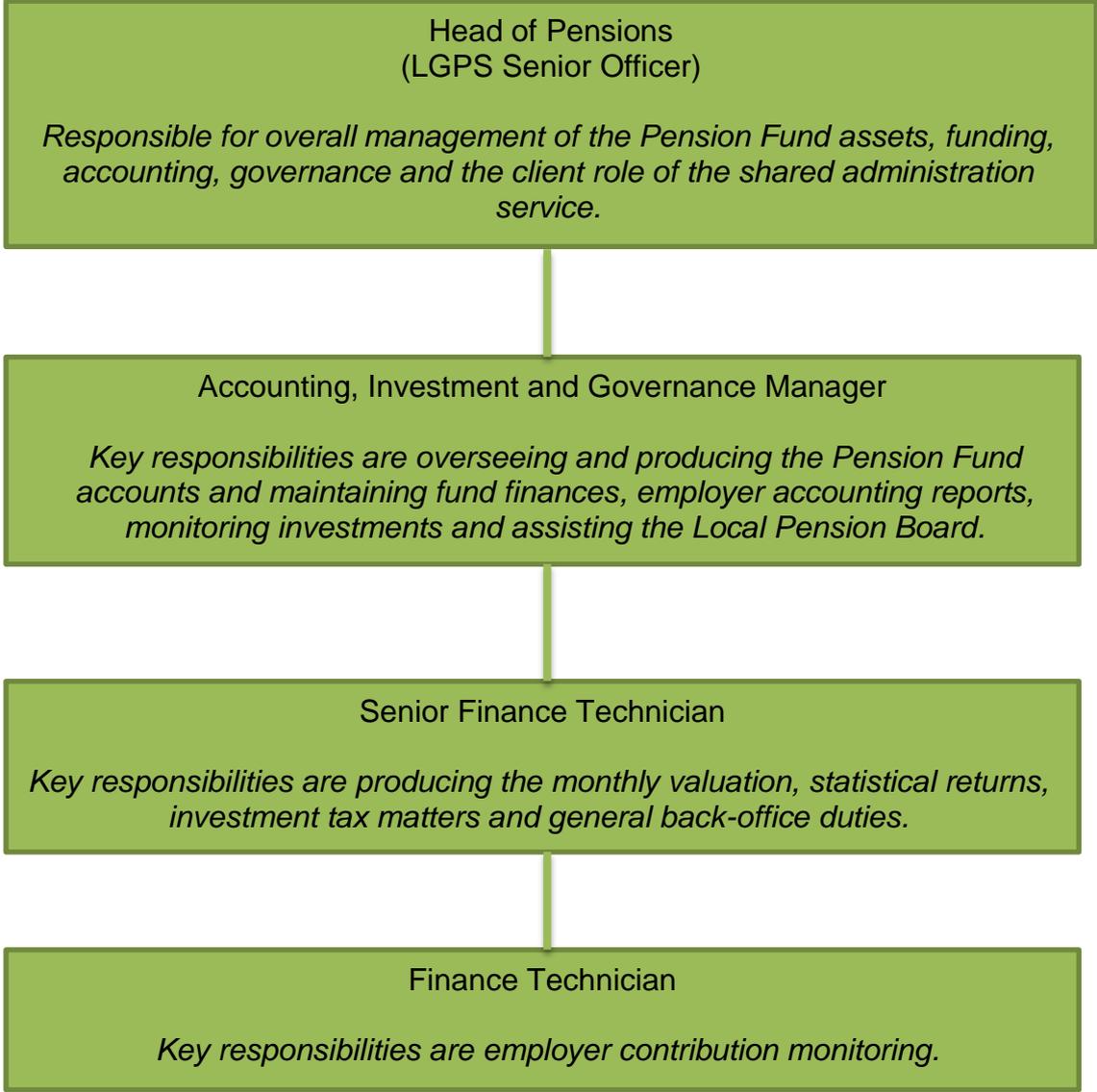


Axis - Left hand side - £m

NB: Expenditure includes all costs of managing the Fund

RESOURCES AND BUDGET

The organisational structure of the Pension Fund team is illustrated below:



The Fund also accesses other services within the Council, such as the expertise of the Treasury Manager who manages the cash the Fund holds and Legal Services who provide advice, in addition to external providers such as the independent investment adviser, the actuary, the investment consultant, the external Investment Managers and any other specialist external advisers as required.

As mentioned previously, the administration function is provided by West Yorkshire Pension Fund in a shared service arrangement, with a number of staff co-located with the Pensions Team in Lincoln.

The estimated costs of operating the Lincolnshire Pension Fund for 2020/21 are shown below. They are split between Administration Costs, Investment Management Expenses and Oversight and Governance Costs.

- **Administration Costs** include the costs of dealing with Fund members and employers in relation to current and future benefits. This service is provided to Lincolnshire Pension Fund via a Share Service with West Yorkshire Pension Fund.
- **Investments Management Expenses** include the cost of Fund Managers, Border to Coast Pension Partnership and the Fund's Custodian.
- **Oversight and Governance Costs** include the cost of the Fund's actuary, external auditor and other advisors, staffing costs for the running of the Fund and the cost of the Local Pensions Board. Actuarial costs incurred by individual employers within the Fund are recharged to that employer.

	Budget 2020/21 £'000
<u>Administration Costs</u>	
- Charge from Shared Services Administrator	1,283
- Other	1
<u>Investment Management Expenses</u>	
- Management Fees	9,172
- Performance Related Fees	0
- Other Fees *	942
<u>Oversight and Governance Costs</u>	
- Contracted Services	361
- Recharge of Actuarial Services	-160
- Recharge from Administering Authority	248
- Other Costs	41
	11,888

* Other Fees includes: Custody Fees and Transaction Costs.

The Pension Fund's Annual Report and Accounts provide more detail on all costs incurred during each year and reported at the July Committee meeting.

KEY TASKS 2020/21

The plan below highlights the key tasks of the Pension Scheme, linked to the objectives of the Fund. Much of the work will cross more than one objective stream.

Subject	Context	2020/21 Action	Objective stream
Pensions Committee and Board meetings	The responsibility for the Pension Fund is delegated to the Pensions Committee, with the Pension Board providing an oversight role on the administration and governance of the Fund.	Ensure all papers are prepared and presented in a clear and concise manner. Ensure that all relevant matters are reported to the Committee and /or Board.	Governance Investments and Funding Administration and Communications
Asset Pooling with Border to Coast	Border to Coast Pensions Partnership has been created to meet the Government's investment reform criteria. In accordance with regulations and statutory guidance, assets should transition to the management of Border to Coast as appropriate vehicles become available.	Continued partnership with Border to Coast to develop appropriate sub-funds for investment and ensuring appropriate oversight and governance of the company.	Governance Investments and Funding
Administration Service (including employer data quality)	A good performing administration service is key to our stakeholders and for ensuring the quality of information held is appropriate for calculating benefits and liabilities.	Continued partnership and oversight of West Yorkshire Pension Fund (WYPF) in the delivery of the administration service and to improve the reporting on data quality and management information.	Governance Administration and Communications
Annual Report and Accounting	The Fund is required to produce an Annual Report and Accounts document and ensure the financial statements are accepted as a true and fair view by auditors.	A detailed project plan has been put in place, built on experience from previous years and updated for new requirements. On-going engagement with the external auditors to ensure all requirements can be met in a timely	Governance

		manner.	
Responsible Investment (RI)	There is continued focus on how LGPS Funds can best address and manage RI issues such as environmental, social and governance matter (ESG).	Continued information and training for the Committee and Board to understand RI. Working closely with external managers and Border to Coast to ensure that it is embedded across all investment decisions.	Governance Investments and Funding
Actuarial Services Tender	The contract with the Fund's Actuary expires in October 2020. The national framework for actuarial services is being refreshed and will be available to call off in the summer.	Participate in the national framework refresh and call off the new framework once completed. Recommend an actuarial appointment to the Committee.	Governance Investments and Funding
Work by the Scheme Advisory Board (SAB)	The SAB have a number of projects underway to improve the management /governance of LGPS Funds.	Participate in projects were possible and respond to any actions required – e.g. Good Governance Review, data quality.	Administration and Communications
Employer Accounting	Employers within the Fund require pensions accounting information at various times of the year, for inclusion in their statutory accounts.	Work with employers, the Actuary and WYPF to ensure employers understand their choices, accurate and timely data is sent to the Actuary and accounting reports are received and understood by employers.	Investments and Funding Administration and Communications

KEY RISKS

The table below highlights the key risks that face the Pension Fund, and the mitigating actions being taken to minimise, where possible, those risks. A more detailed risk register is brought to the Committee in full in July.

Risk Theme	Key Action
Governance	
Statutory governance requirements not met.	Governance and Compliance statement and statutory policies reviewed annually. Monthly reporting to the Committee and Board. On-going training with Committee and Board.
Failure to ensure that the Committee's knowledge and understanding of pensions related activities is robust and meets all statutory requirements.	Annual Training policy and plan approved. Induction and ad-hoc training provided. Semi-annual training for Committee.
The introduction of asset pooling impacts on the Fund's ability to implement its investment strategy successfully or the Administering Authority is considered to not comply with the relevant statutory guidance.	Continued strong involvement in the work of Border to Coast at officer and at Pensions Committee Chairman level.
Failure to ensure that the Pension Board is effective in carrying out its role.	Induction and on-going training and work plan agreed. Semi-annual training for Board members. Regular assessment of Board effectiveness.
Investments and Funding	
Insufficient funds to meet liabilities resulting in increased contributions required from employers or changing to a higher risk investment strategy	Prudent assumptions adopted by the Fund Actuary. Monitor, maintain and review the Investment Strategy Statement and Funding Strategy Statement. Regularly review investment performance and funding levels.
Performance of the Fund's assets and managers not in line with expected returns.	Monitor, maintain and review the Investment Strategy Statement and Funding Strategy Statement. Clear Investment Management Agreements in place. Regularly review investment performance and funding levels. Consideration of Environmental, Social and Governance issues on the

	performance of the portfolio.
Transition of assets to Border to Coast into inappropriate vehicles.	Monitor, maintain and review the Investment Strategy Statement. Regular strategy reviews to monitor and review the transition timetable and expectations. Continued close working with Border to Coast to develop investment vehicles.
Failure to meet requirements as a responsible investor - across all ESG risks (including climate change and a move to a low carbon economy).	Regular discussion and reporting from managers and Border to Coast. Stewardship Code, RI Beliefs and appropriate RI policies in place and approved by Committee. Training and education of RI matters.
Political environment (locally or nationally) impact on investment opportunities, markets and legislative requirements.	Work closely with investment managers, other suppliers and advisers to understand potential impacts and responses. Regular training and communications with the Committee.
Administration and Communication	
Inability to deliver the administration service in accordance with the agreement.	Administration report and performance indicators reported quarterly and presented to Committee. Bi-monthly meetings with WYPF. Regular audits by both LCC and WYPF. Complaint reporting and reviews Customer surveys undertaken.
Poor quality data resulting in error and misstatement.	Develop and implement a Data Improvement Plan. Maintain robust accounting records.
Cyber security breach resulting in personal data being accessed fraudulently.	Strong IT environment for administration system and web-based Portals.
Increase in variety and number of employers participating in the Scheme resulting in risk of non-compliance with obligations or reducing covenant strength.	Clear Admission Agreements in place. Guidance published and reviewed relating to the Scheme requirements. Proactive engagement with employers.
Employer breaches – data, contributions etc.	Administration strategy with Employers. Employer training and assistance offered. Monthly contribution monitoring.
People	
Loss of key staff and loss of knowledge and skills.	Diversified staff / team and succession plans in place. Building on Border to Coast and partner fund relationships.

FORWARD PLAN – 2020/2021 COMMITTEE AND BOARD MEETINGS

Below are the planned reports as known at the time of writing – additional reports may be added.

Date	Topics
June 2020 Committee papers	External Manager Presentations Border to Coast Invesco Asset Management Morgan Stanley Alternatives
Jul 2020 Committee papers	Independent Advisor Market Update Local Board Update Fund Update Pensions Administration Update Employer Contributions Monitoring Investment Management Report Annual Property Report Actuarial Methodology and Approaches Risk Register Annual Review Annual Training Report Annual Report and Accounts
Jul 2020 Board papers	Fund Update Pensions Administration Update TPR Data Scoring Employer Contributions Monitoring Cyber Security Report Risk Register Annual Review Actuarial Methodology and Approaches Annual Report and Accounts Training Needs Workplan
Sep 2020 Training	To be agreed
Oct 2020 Committee papers	Independent Advisor Market Update Local Board Update Fund Update Pensions Administration Update Employer Contributions Monitoring Investment Management Report

	<p>Annual Fund Performance Report Actuarial Appointment Report Audit Governance Report</p>
<p>Oct 2020 Board papers</p>	<p>Fund Update Pensions Administration Update TPR Data Scoring Employer Contributions Monitoring Actuarial Appointment Report Audit Governance Report Meeting of the Border to Coast Pension Board Chairs Training Needs Workplan</p>
<p>Dec 2020 Committee papers</p>	<p>External Manager Presentations Border to Coast</p>
<p>Jan 2021 Committee papers</p>	<p>Independent Advisor Market Update Local Board Update Fund Update Pensions Administration Update Employer Contributions Monitoring Investment Management Report B2C RI policy and voting guidelines update and LPF alignment</p>
<p>Jan 2021 Board papers</p>	<p>Fund Update Pensions Administration Update TPR Data Scoring Employer Contributions Monitoring Meeting of the Border to Coast Pension Board Chairs Training Needs Workplan</p>
<p>Feb 2021 Training</p>	<p>To be agreed</p>
<p>Mar 2021 Committee papers</p>	<p>Independent Advisor Market Update Local Board Update Fund Update Pensions Administration Update Employer Contributions Monitoring Investment Management Report</p>

	<p>Annual Policies Review Review and Approval of Accounting Policies Business Plan and Budget Review</p>
<p>Mar 2021 Board papers</p>	<p>Fund Update Pensions Administration Update TPR Data Scoring Employer Contributions Monitoring Annual Policies Review Review of Accounting Policies Business Plan and Budget Review Training Needs Workplan</p>